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October 27, 2025

Via Electronic Mail and First Class U.S. Mail

Chair Julie Lee and Council Members
Delta Stewardship Council
715 P Street, 15-300
Sacramento, CA 95814
engage@deltacouncil.ca.gov

Re: Request for Equitable Process for Certification of Consistency for the
Delta Conveyance Project – *Resubmission*

Dear Chair Lee and Council Members:

This request regarding the Delta Stewardship Council's (DSC) process for the California Department of Water Resources' (DWR) Delta Conveyance Project (DCP) Certification of Consistency with the Delta Plan is submitted on behalf of the County of Sacramento, Sacramento County Water Agency, Sacramento Area Sewer District, County of Solano, County of San Joaquin, County of Yolo, and City of Stockton (collectively "Delta Public Agencies"). The Delta Public Agencies request the DSC exercise its discretion to ensure that deadlines for the DCP Consistency Certification process are equitable and result in a fair hearing and sufficient due process. This request was first sent on October 13, 2025. On October 16, 2025, the Delta Public Agencies received a letter from Chair Lee informing that DSC's appellate jurisdiction was not in effect because a Final DCP Certification of Consistency with the Delta Plan (Final DCP Certification of Consistency) had not yet been submitted, and that any procedural requests concerning appeals must be submitted during the appeal process and served on all parties. On October 17, 2025, DWR submitted what it deemed to be its Final DCP Certification of Consistency. The Delta Public Agencies therefore resubmit its prior request (as revised) and serve it on DWR by copy here.

Importantly, Final DCP Consistency Certification documents posted on DSC's website on October 17, 2025, were improperly titled, making it overly burdensome if not impossible to identify and navigate critical documents. Mislabeled documents included attachments to the Consistency Certification listed in its table of contents, which are an important part of the Certification. On October 21, 2025, after grappling with these mistitled documents, counsel for the counties of San Joaquin, Solano, and Yolo notified DSC of this error and the potential omission of material and requested additional time to file appeals. DSC responded that it does not have the power to extend the statutory deadline to file appeals. Later in the day, additional Consistency Certification and record documents were uploaded to

the website, with the number of record documents growing from just 82 to 13,360 over the course of a few hours. Notably, documents are still misidentified. For example, Attachment A to the DCP Consistency Certification (record no. DCP.AA.1.00004) is categorized as “Supporting Record,” when it is in fact a part of the Consistency Certification. If a certification of consistency is submitted and published with significant errors, as has occurred here (seemingly twice), then it should not constitute a final product and instead should be considered a draft. There is nothing in the statute or regulations that prevents DSC from determining that DWR’s October 17 submission and any erroneous subsequent submission are drafts and a corrected submission, with proper document identifiers, is the Final Consistency Certification from which the 30-day clock for appeals runs.¹ The Delta Public Agencies request that DSC make this determination.

The DCP is the largest and most impactful water project in the State of California since the State Water Project was approved, funded, and constructed. The DCP would construct new expansive and intrusive water diversion and maintenance facilities, including massive intakes and a 45-mile long tunnel, partially within and near Delta legacy communities, over the course of 14 years to divert up to 6,000 cubic feet per second of water from the Sacramento River in the north Delta to Bethany Reservoir in the south Delta, bypassing the Delta ecosystem to deliver water to Central and Southern California, parts of the eastern Bay Area and Silicon Valley. The DCP would result in significant and unmitigated impacts to Delta communities and their water supply, agriculture, the environment and the landmark Harvest Water Program, which will deliver drought-resistant recycled water to agricultural lands and existing habitats in southern Sacramento County and which is the first water storage project to be awarded funding under the State’s Water Storage Investment Program. Due to these devastating impacts, the Delta Public Agencies have a direct and substantial interest in the DCP and its relationship to the Delta Plan policies and the Delta Reform Act’s co-equal goals of a reliable statewide water supply and a protected, restored, and enhanced Sacramento-San Joaquin Delta ecosystem, while preserving the Delta as a place for its unique cultural, recreational, natural resource, and agricultural values. There can be no doubt the DCP is the most consequential project that will ever come before the DSC for evaluation of consistency with these goals and policies.

The Final DCP Consistency Certification is comprised of a 241-page primary document and 23 appendices, some of which exceed 180 pages. The record supporting the Final DCP Consistency Certification, presuming DWR ultimately submits the true “full and complete” record that “was before the certifying agency at the time it make[s] its certification,”² is massive. The record currently available on the DSC website comprises many thousands of pages (currently 13,360 documents). Reviewing and evaluating this material requires a substantial effort by Delta Public Agencies staff and their consultants that necessitates adequate time. Record review is made even more difficult, prejudicially so,

¹ See Wat. Code, § 85225.15; Cal. Code Regs., tit. 23, § 5022, subd. (a).

² Cal. Code Regs., tit. 23, § 5022, subd. (e)(1).

because of the way in which the record is organized and functions. The record index currently available to the public does not include hyperlinks to individual record documents. Instead, reviewers must sift through the multiple confusing tabs and pages in the index, locate a record document, then return to the database and attempt to search for that document using specific criteria that is not readily discernible. No instructions are provided, and several recent searches have yielded zero documents. No matter the functionality of the database, a hyperlinked index is necessary here for appellants to “include citations to evidence in the record, to support the grounds for appeal identified in the appeal” and “show that the certification of consistency is not supported by substantial evidence in the record.”³ The Delta Public Agencies request that, at a minimum, DWR or DSC provide a hyperlinked record index that functions properly lest the entire process be prejudiced.

As previously documented, the Delta Public Agencies also object to the so-called “early consultation” on the Delta Tunnel project, which has been occurring since DWR withdrew its consistency certification for the California WaterFix project in 2018. The Delta Public Agencies and others have requested, but been denied, the opportunity to participate in these meetings, which should have been open to the public. As a result of this extensive “early consultation,” DSC staff has had serial meetings with DWR over several years and has had the opportunity to review the entire draft consistency certification and provide iterative comments on it. The Delta Public Agencies and other members of the public have not had such an opportunity and are only now seeing these voluminous materials (which have been withheld from Public Records Act disclosures by DSC) for the first time.

The Delta Public Agencies’ opportunity to consider the Final DCP Consistency Certification, like their opportunity to have considered the draft version⁴, also is stymied by competing deadlines and responsibilities associated with the multiplicity of already pending DCP-related proceedings. These proceedings include: a hearing requested by DWR at the Third Appellate District Court in connection with its appeal on its Delta Program General

³ Cal. Code Regs., tit. 23, § 5029, subds. (c)(1),(d).

⁴ Notably, the time provided to review the Draft DCP Consistency Certification was insufficient. DSC requires DWR to post a draft certification “[a]t least 10 days prior to its submission of a certification to the council ... for public review and comment.” The timing of DWR’s notice of intent to submit its certification, on a Friday, ensuring the 10-day comment period spanned two weekends and a week when three of the five working days were scheduled for all-day hearings in the DCP Water Rights Hearing, and the likely schedule for certification appellate proceedings, strongly suggests an intent to chill participation by DCP stakeholders. A 10-day public review period may be sufficient for smaller and less impactful covered actions under other circumstances, but it was plainly insufficient, and impossible under the specific circumstances described here, to allow a reasonable opportunity to review a certification of this size and significance. Any equitable review period for this type of statewide action and volume of material should be between 30 and 60 days. As a result of this truncated 10-day review period, the Delta Public Agencies were unable to comment on the substance of the Draft DCP Consistency Certification. The lack of substantive comments on the Draft DCP Consistency Certification should in no way be interpreted as a lack of interest or concern, but a reflection of the impossible situation that DWR created. DSC has discretion to set and extend public review periods for draft consistency certifications, and it should have done so here to ensure an equitable process.

Bond Resolution (set for November 19); DWR’s scheduling of mandatory meet and confer meetings in DCP California Environmental Quality Act (CEQA) litigation⁵ the week of November 3; a December 5 deadline (specifically sought by DWR over objection from interested parties) for trial briefs in DWR’s latest litigation seeking to validate bond resolutions for the DCP; and, the State Water Resources Control Board (SWRCB) public hearing on DWR’s pending Petitions for Change of Water Right Permits 16478, 16479, 16481, and 16482 (DCP Water Rights Hearing). Each of these DCP proceedings has pending deadlines and tasks involving the same stakeholders in the DCP Consistency Certification. The DCP Water Rights Hearing in particular has the Delta Public Agencies and other DCP stakeholders occupied with full days of hearing on October 23, 27, 28 and 29 and November 17, including half and full-day Delta site visits on October 14, 16, and November 10, plus the potential for additional hearing days to be scheduled in November, and a December 1 deadline (the Monday after Thanksgiving) for Delta Public Agencies and other DCP stakeholders to respond to November 17 submittals by DWR of its objections to their hearing evidence. The schedule for an appellate process for the Certification of Consistency will run concurrently with these other proceedings and span the Thanksgiving and winter holidays.

It is unclear to the Delta Public Agencies why DWR believes this is the appropriate time to submit its certification of consistency for the DCP, given that it still lacks the necessary water rights to operate the proposed diversions, which will dictate the DCP construction and operating terms, or information about appropriate Delta flow criteria and which depend in part on the outcome of the pending update of the Bay-Delta Water Quality Control Plan (WQCP). The SWRCB is preparing additional CEQA analysis of the WQCP alternative that DWR has relied on for its DCP water supply and impact analysis, and the SWRCB’s additional CEQA analysis *and* a final determination on the WQCP will not be available until late 2026. Moreover, the Administrative Hearing Office (AHO) for the water right change petition hearing determined, in an October 10, 2025 letter to DWR (attached), that it lacks the “administrative record” required “to inform the State Water Board’s decision concerning what Delta flow criteria would be appropriate for the DCP, as required by the Delta Reform Act, and to evaluate requirements that may be necessary to ensure consistency with the proposed updates to the BayDelta Plan” and has required “supplemental modeling and associated results” from DWR. (See Attachment, pp. 3-4, citing Wat. Code, § 85086.) Until DWR provides this supplemental information, and until the WQCP is adopted and its flow objectives are operable, it is impossible to determine consistency with Delta Plan Policy ER P1, particularly since neither DWR nor the DSC have expertise in setting appropriate flow criteria and the entity that does have that expertise, and statutory responsibility, the SWRCB, has determined that there is presently insufficient information to support a finding that the DCP is consistent with the Delta Reform Act and Delta Plan.⁶ The lack of water rights and

⁵ The litigation also includes claims brought under the Delta Reform Act, Delta Protection Act, the Watershed Protection Act, and the Public Trust Doctrine.

⁶ Cal. Code Regs., tit. 23, § 5005, subd. (a).

information related to appropriate Delta flow criteria was, in the DSC's staff draft determination in 2018, a fatal flaw in DWR's attempt to certify consistency with the Delta Plan for its WaterFix project. It should likewise be considered a fatal flaw here.

Given the scope of the DCP and its direct and reasonably foreseeable indirect effects, the amount of material to review during the consistency certification process, and the competing deadlines in other DCP proceedings, DCP stakeholders must be afforded substantial time to review the Final DCP Consistency Certification and its record and to prepare hearing material to ensure an equitable process.

Based on the body of publicly available information about the DCP, including the DCP environmental impact report and the testimony submitted in the pending DCP Water Rights Hearing, the Delta Public Agencies do not believe DWR will be able to demonstrate consistency with the co-equal goals or numerous Delta Plan policies. The Delta Public Agencies are in the process of considering filing appeals of the Final DCP Consistency Certification and presume that several appeals will be filed. The timelines associated with the appeal proceeding are also of grave concern given the scope of the DCP. It appears evident that DWR elected to submit its Draft and Final Certifications at the time it did to stifle public participation and consideration of the most consequentially covered action certification that will come before the DSC.

DSC has discretion when specifying deadlines related to requests for admission of additional documentation and information in the record, written submissions for the appeal hearing, and the appeal hearing.⁷ In accordance with fair hearing⁸ and due process⁹ principles, DSC should set deadlines that afford stakeholders reasonable time to review the record and, if warranted, make requests to include additional documentation and information, prepare written submissions, and prepare for and participate in the hearing itself. DSC should set the date for the written submissions that precede the hearing at least 60 days past the effective date of the Final DCP Consistency Certification, as allowable by express regulation language or by an agreed-upon extension.¹⁰ The hearing date should be set at least 90 days past the effective date of the Final DCP Consistency Certification,¹¹ reasonably providing at least 30 days from the written submissions due date for DCP stakeholders to prepare for the

⁷ Cal. Code Regs., tit. 23, §§ 5027, subd. (a)(1), 5029, subd. (b), 5030, subd. (b).

⁸ Stakeholders here have the right to a fair hearing, including a reasonable opportunity to respond. (See, e.g., *Applebaum v. Board of Directors* (1980) 104 Cal.App.3d 648, 657, citing *Ezekial v. Winkley* (1977) 20 Cal.3d 267; *People v. Ramirez* (1979) 25 Cal.3d 260; see also Code Civ. Proc., § 1094.5, subd. (b).)

⁹ Procedural due process applies to all governmental adjudicatory action. (See Cal. Constitution, art. I, § 7; *Saleeby v. State Bar* (1985) 39 Cal.3d 547, 563-564.)

¹⁰ Cal. Code Regs., tit. 23, § 5029, subds. (a), (b).

¹¹ *Id.*, § 5030, subds. (a), (b).

Delta Stewardship Council

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hearing. Moreover, DSC can and should hold more than one hearing and/or continue the hearing given the resources at stake in this proceeding.¹²

Accordingly, the Delta Public Agencies request that DSC adjust timelines and deadlines as indicated to allow all DCP stakeholders to equitably engage in the DCP consistency certification process and ensure a fair hearing with sufficient due process for this project of incalculable impact and statewide importance.

Sincerely,
Somach Simmons & Dunn



Kelley M. Taber
*Counsel for County of Sacramento, Sacramento
County Water Agency, Sacramento Area Sewer
District, and City of Stockton*

Soluri Meserve, A Law Corporation

/s/ Osha R. Meserve

Osha R. Meserve
*Counsel for County of San Joaquin, County of
Solano, and County of Yolo*

Attachment

cc: Kathryn Marquez, DWR (DCP_Consistency@water.ca.gov)

¹² *Id.*, §§ 5029, subds. (c), (d), 5030, subds. (c), (d).

State Water Resources Control Board

October 10, 2025

Ann Carroll
General Counsel
Department of Water Resources
ann.carroll@water.ca.gov

Re: Request for Additional Information to Supplement the Administrative Record in the Hearing on the Proposed Delta Conveyance Project

Dear Ms. Carroll,

By this letter, the Administrative Hearings Office (AHO) of the State Water Resources Control Board (State Water Board or Board) requests additional information to clarify and supplement information in the administrative record for the ongoing Delta Conveyance Project (DCP) proceeding on the pending petitions to change water right Permits 18478, 16479, 16481, and 16482. The requested modeling results are necessary for the Board to determine appropriate Delta flow criteria for the DCP as required by the Delta Reform Act of 2009 (Delta Reform Act), assess consistency with proposed updates to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan), consider avoidance of any potential unreasonable effects on fish and wildlife or other uses protected by the public trust, and evaluate the potential benefits and impacts of operation of the proposed DCP under possible future climate conditions.

Available Model Runs and Information

DWR prepared and submitted to the AHO, by the deadline for case-in-chief evidence on January 21, 2025, testimony and exhibits based on model runs relied upon in the 2023 Final Environmental Impact Report for the DCP (Final EIR). These model runs incorporated operations in place in 2023 for the State Water Project (SWP), including operations consistent with the 2019 Long Term Operations (LTO) of the SWP and

Central Valley Project and the associated 2019 federal Biological Opinions (BiOps) and 2020 Incidental Take Permit (ITP).

DWR and the U.S. Bureau of Reclamation updated the LTO in 2024 and the State and federal fish and wildlife agencies issued new Biological Opinions and an ITP in November and December 2024, and the California Department of Fish and Wildlife issued the 2025 DCP ITP in February 2025. These permits include different operating constraints from those incorporated into the model runs relied upon in the Final EIR. On February 21, 2025, DWR submitted to the AHO revised expert witness testimony and exhibits based on updated modeling data that incorporated these new regulatory requirements, labeled as the Updated Baseline and ITP DCP scenarios (collectively, ITP Modeling; see Exh. DWR-0104R). The ITP Modeling scenarios also incorporate flows and operations to reflect implementation of the Healthy Rivers and Landscapes proposal (also known as the Voluntary Agreements (VAs)). The ITP Modeling scenarios centered on the year 2020 and did not include climate adjusted model runs centered on the year 2040, as was included in the model runs relied upon in the Final EIR.

On March 7, 2025, DWR submitted to the AHO the underlying technical files for the ITP Modeling. On July 11, 2025, DWR submitted a summary of the model output data for the ITP Modeling in a form and level of detail equivalent to that included in the Final EIR, as directed by the AHO.

Delta Flow Criteria

Under the Delta Reform Act, any approval of the change petitions for the DCP must include “appropriate Delta flow criteria” informed by the flow criteria necessary to protect the Sacramento-San Joaquin Delta (Delta) ecosystem. (Wat. Code, § 85086.) To protect native fish species, the flow criteria developed by the Board in 2010 included a net Delta outflow criterion of 75 percent of the total unimpaired flow into the Delta, between January and June, and an inflow criterion of 75 percent of unimpaired Sacramento River flow at Rio Vista from November through June. (AHO-057, pp. 98-103, 114-117.) In developing the 2010 flow criteria, the Board did not take into consideration and balance competing demands for flows in the Delta to satisfy other beneficial uses, including municipal, industrial, and agricultural uses. (*Id.* at p. 2-3.)

The Board is currently updating the Bay-Delta Plan for the reasonable protection of fish and wildlife beneficial uses in the Bay-Delta watershed. This process includes consideration and balancing of all beneficial uses of water. In July 2025, the Board released draft updates to the Bay-Delta Plan, which would establish a requirement for

water rights that are not subject to approved VAs that “inflows from Sacramento/Delta tributaries shall be maintained at 55 percent of unimpaired flow year-round on a 7-day running average to achieve the narrative inflow objective.” (July 2025 Draft Bay-Delta Plan, p. 46.) The draft plan also would establish an inflow-based Delta outflow objective that would provide for required inflows to be provided as Delta outflows. (*Id.* at pp. 57-58.) The July 2025 Draft Bay-Delta Plan identifies water supply adjustments that would apply to the inflow requirements for existing water rights, but the draft plan does not specify whether those adjustments would apply to new water rights or changes to existing water rights. The draft plan provides that in future water right actions, the Board will determine based on the record in individual adjudicative proceedings what requirements should be imposed “to ensure that the use of water is consistent with and supports the salmon protection, fish viability, inflow, inflow-based Delta outflow, and interior Delta flow objectives.” (*Id.* at pp. 46, 64.)

The AHO has determined that the administrative record developed to date is inadequate to inform the State Water Board’s decision concerning what Delta flow criteria would be appropriate for the DCP, as required by the Delta Reform Act, and to evaluate requirements that may be necessary to ensure consistency with the proposed updates to the Bay-Delta Plan. Modeling of DCP operational scenarios with a range of possible bypass flow requirements will inform the Board’s consideration of the trade-offs between different levels of protection for fish and wildlife in the Delta and the water supply benefits of the DCP, and is relevant to the Board’s findings whether the proposed changes to DWR’s water right permits would unreasonably affect fish and wildlife, appropriately protect public trust resources, be in the public interest, and be consistent with the Bay-Delta Plan applicable at the time the Board acts on the petitions.

Range of Climate Scenarios

DWR states that one objective of the DCP is to “help address anticipated rising sea levels and other reasonably foreseeable consequences of climate change and extreme weather events.” (AHO-1004, p. 2-2 [Final EIR, Section 2.3, Project Purpose and Objectives].) However, the DCP ITP Modeling runs that DWR submitted in this proceeding did not incorporate future climate assumptions. Furthermore, the 2040 Central Tendency (2040 CT) climate scenario relied upon by DWR in the Final EIR predicts hotter and wetter conditions. (AHO-1198, p. 30A-5, Figure 30A-2 [Final EIR, Section 30A.1.1, Climate Change Assumptions].) DWR did not submit model runs for any future climate scenario with lower precipitation or streamflow than existing conditions, representing hotter and drier conditions in the Bay-Delta Watershed, even though DWR’s climate modeling identifies such conditions to be reasonably possible.

(DWR-00214, p. 5-38, Table 5-1 [Risk-Informed Future Climate Scenario Development for the State Water Project Delivery Capability Report].; LAND-60, pp. 7-63 to 7.77 [The State Water Project Delivery Capability Report 2023 (DCR), Section 7, SWP Water Delivery Capability Under Future Climate Change Conditions (DCR-Climate)].; FOR-103, pdf p. 4 [California's Water Supply Strategy; Adapting to a Hotter, Drier Future].)

Additional modeling of DCP operations that incorporate recent regulatory changes and a reasonable range of future climate conditions is necessary to inform the Board's findings and consideration of appropriate conditions on any approval of the proposed DCP. This information is necessary to identify a range of potential benefits and impacts of operation of the project, which is relevant to the Board's findings whether the proposed changes to DWR's water right permits may injure legal users of water or unreasonably affect fish and wildlife, appropriately protect public trust resources, and be in the public interest.

Direction to Submit Supplemental Information

In response to questions by the AHO, DWR stated that it is conducting CalSim 3 and DSM2 model runs for the Updated Baseline and DCP-ITP for 2043 and will submit model results on rebuttal. (2025-09-17 AHO email to DWR; 2025-09-19 DWR email to AHO (modeling response).) DWR indicated that it also intends to conduct CalSim 3, but not DSM2, model runs for the Updated Baseline and DCP-ITP for 2085, and will submit those model results on rebuttal. DWR stated that it has not conducted any model runs incorporating unimpaired flows as bypass flows requirements with the Updated Baseline and DCP-ITP. Because it appears that the information gaps in the record described above may not otherwise be addressed by the parties on rebuttal, I direct DWR to conduct and submit supplemental modeling and associated results, as detailed below.

The AHO directs DWR to submit by the deadline for submission of rebuttal exhibits, CalSim 3 and DSM2 model runs and summaries of model results in a form and level of detail equivalent to the May 23, 2025 Supplemental Information Request for ITP Modeling, with and without DCP, including technical model files, for the following scenarios:

1. Model runs incorporating a percentage of unimpaired Delta outflow (e.g., Net Delta Outflow Index (NDOI) or other appropriate Delta outflow measurement) as bypass flow requirements at the proposed DCP north Delta pumping facilities for net increases in diversions due to the proposed DCP Project, ranging from 35 percent to 65 percent of unimpaired flow in 5 percent

increments. DWR may submit model runs in 10 percent increments if DWR demonstrates that linear interpolation of data between modeled 10 percent increments is appropriate. The bypass flow requirements should be formulated to prohibit net increases in total diversions using the proposed DCP north Delta pumping facilities and the existing south Delta pumping facilities, relative to without DCP conditions, when the specified percentage of unimpaired Delta outflow is not met. The modeling should assume that the percentage of unimpaired flow is a limitation on additional diversions due to DCP but should not assume that changes in reservoir operations or other changes to operations would be made to achieve the specified percentage of unimpaired flow. The modeling can assume that pumping is shifted from the existing south Delta pumping facilities to the proposed DCP pumping facilities when the specified percentage of unimpaired flow is not met provided that there are no net increases in total diversions using the two facilities compared to without DCP conditions on a monthly basis. These model runs shall otherwise have the same assumptions as the ITP modeling. These model runs shall use the 2040 central tendency (CT), or similar condition, as the climate scenario. The modeling results should be accompanied by a summary of the modeling assumptions and a detailed description of the technical approach used.

2. Climate adjusted model runs centered around the year 2040, or similar condition, using the CT and the 75th percentile level-of-concern scenario (75-LOC), as described in the DCR (LAND-60, pp. 7-64 to 7-65 [DCR, Section 7, SWP Delivery Capability Under Future Climate Change Conditions].) and the DCR-Climate. (DWR-00214, pp. 5-31 to 5-39 [DCR-Climate, Section 5.3.3, Combining Future Climate States and System Consequence Response and Selection of Future Climate States for Multiple “Levels-Of-Concern”].) These model runs shall otherwise have the same assumptions as the ITP modeling. DWR may propose an alternative to the 75-LOC scenario, subject to AHO review and approval.

3. Climate adjusted model runs centered around the year 2070, 2085, or similar period, that DWR believes are representative of longer-term future climate conditions. These runs shall use the CT, as described in Exhibits LAND-60 and DWR-214. These runs shall otherwise have the same assumptions as the ITP modeling.

Sincerely,

A handwritten signature in blue ink, reading "Nicole Kuenzi". The signature is written in a cursive, flowing style.

Nicole Kuenzi
Presiding Hearing Officer
Administrative Hearings Office
State Water Resources Control Board

Attachments:

- Attachment 1 – Service List

**ATTACHMENT 1
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