STOCKTON
EAST WATER
DISTRICT
PROVIDING SERVICE SINCE 1948
www.sewd.net

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AMENDED MEETING NOTICE

The Administration Committee
of the Stockton East Water District
Board of Directors will meet at
10:00 a.m., Wednesday, December 17, 2025
at the District Office, 6767 East Main Street, Stockton, CA

Assistance for the Disabled: If you are disabled in any way and need accommodation to participate in the meeting, please call Administrative Staff at (209) 948-0333 for assistance so the necessary arrangements can be made.

AGENDA

		Page No
1.	Roll Call - Chairperson Sanguinetti, Director Nakaue, Director Watkins, Director Panizza (Alternate)	
2.	Public Comment	
3.	Stockton East Water District – Staff Report – Consider Recommending Policy No. 4635 – Public Records Request Policy to the Board of Directors for Consideration and Adoption	01
4.	Adjournment	

Certification of Posting

I hereby certify that on December 16, 2025, I posted a copy of the foregoing agenda in the outside display case at the District Office, 6767 East Main Street, Stockton, California, said time being at least 72 hours in advance of the meeting of the Stockton East Water District Administration Committee Meeting (Government Code Section 54954.2). Executed at Stockton, California on December 16, 2025.

Priya Ram, Director of Finance & Administration
Stockton East Water District

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DATE: **December 17, 2025**

AGENDA ITEM NO. 3

TITLE: **Public Records Request Policy**

SUBJECT: **Consider Recommending Policy No. 4635 – Public Records Request Policy to the Board of Directors for Consideration and Adoption**

Executive Summary

This report presents a proposed Public Records Request Policy (Policy No. 4635) for consideration by the Administration Committee. The proposed policy establishes clear procedures to guide staff in the receipt, review, and response to public records requests under the California Public Records Act.

Staff recommends that the Committee refer the policy to the Board of Directors for formal adoption.

Background

The California Public Records Act (CPRA) ensures that the public has access to information concerning the conduct of the people's business. As a local public agency, Stockton East Water District (District) is required to make public records available for inspection or copying upon request, unless a specific exemption applies. The District must respond within a reasonable timeframe, assist requesters in identifying responsive records, and provide access in accessible formats when feasible, all while safeguarding sensitive or exempt information such as personnel, security, or legal records. The CPRA reinforces transparency, accountability, and public trust in the District's operations.

Summary

The District is committed to transparency and timely access to public records. In response to updates in legal requirements and best practices, staff and legal counsel have developed a comprehensive Public Records Request Policy that provides direction to District personnel and requestors. The policy outlines roles, responsibilities, procedures for handling requests, applicable exemptions, and documentation practices.

The proposed policy clarifies response timelines, conditions for inspection, redaction requirements, cost recovery, and exemption categories in compliance with the California Public Records Act. A sample Public Records Request Form is included as Appendix A to assist the public in submitting requests.

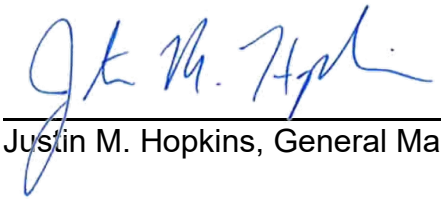
Financial Impact

There is no financial impact related to the proposed policy.

Recommendation

Staff recommends that the Committee refer the policy to the Board of Directors for formal adoption.

Staff Responsible for Report



Justin M. Hopkins, General Manager

Date: 12/17/2025

Attachments

1. Policy No. 4635 – Public Records Request Policy

STOCKTON EAST WATER DISTRICT
POLICY MANUAL

No. 4635 Public Records Request

ADOPTED: Date: TBD

Contents

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A. Policy

It is the policy of the Stockton East Water District to provide open and transparent access to public records in accordance with the California Public Records Act. The District will make public records available for inspection or copying upon request, except where exemptions are authorized by law to protect confidential or sensitive information. All employees responsible for processing public records requests shall comply with this policy and the procedures outlined in this document to ensure timely, consistent, and lawful responses to all requests.

B. Purpose

The purpose of this policy is to establish clear procedures for receiving, reviewing, and responding to public records requests. This policy ensures that the District provides timely access to public information, supports accountability and public trust, and safeguards information that is exempt from disclosure under state or federal law.

C. Scope

This plan applies to all employees of the District involved in the receipt, processing, review, release, or retention of public records. It covers all records prepared, owned, used, or retained by the District, regardless of format or storage location, including physical documents, electronic files, emails, text messages, and other forms of recorded information. Contractors, consultants, and temporary personnel acting on behalf of the District must also comply with this policy when handling District records or responding to public records requests.

D. Definitions

Agency: Refers to any state or local government entity, including departments, commissions, and universities, that are subject to the Public Records Act.

Duty to Create Records: An agency is not required to create a new record, perform research, or compile information that does not already exist.

Exemptions: Specific categories of information that are not subject to public disclosure under the law, such as personnel and medical files, certain investigatory records, and records protected by attorney-client privilege.

Public Record: Any writing containing information related to the conduct of the public's business that is prepared, owned, used, or retained by a state or local agency.

Public Records Coordinator: The Public Records Coordinator shall be the General Manager and/or their designee(s).

Redaction: When a record contains both public and exempt information, the agency must provide the public portion after removing the exempt information.

Request: A formal or informal request to an agency for public records. While the request must be made in writing, it can be made orally and transcribed by the request recipient.

Writing: Includes a wide variety of forms, such as handwriting, typewriting, printing, photostating, photographing, videoing, and transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation. This includes electronic documents, emails, and text messages.

E. Responsibility

Employees

- Promptly forward any public records request received to the Director of Finance and Administration.
- Assist in locating, identifying, and providing access to District records in their possession or control when requested.
- Maintain records in accordance with the District's Records Retention Policy and archiving procedures to ensure accurate and timely retrieval.
- Avoid altering, deleting, concealing, or destroying records that may be responsive to a public records request.
- Protect confidential, privileged, or exempt information and refrain from unauthorized release of such information.

Managers and Supervisors

- Shall ensure their staff comply with the California Public Records Act and this policy.
- Direct and support staff in identifying, locating, and providing requested records in their possession or control.
- Ensure records within their department are maintained in accordance with District records retention and archiving requirements.

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Public Records Coordinator

- Shall administer and oversee the District's public records request process in compliance with the California Public Records Act.
- Shall receive, log, and track all public records requests submitted to the District.
- Coordinate with departments and employees to identify, locate, and collect responsive records.
- Review records to ensure accuracy and completeness prior to release.
- Determine, in consultation with District Legal Counsel when necessary, whether requested records are subject to disclosure or exempt from release.
- Ensure timely responses to requestors, including providing written acknowledgment, requests of extension, determinations, and responses.
- Facilitate inspection of records and provide copies in requested formats when feasible and appropriate.
- Protect confidential, privileged, proprietary, and security-sensitive information from unauthorized disclosure.
- Maintain documentation of requests, responses, and any associated communications.
- Provide guidance to employees and managers regarding public records procedures and requirements.

F. Procedures

Right To Inspect Records

Members of the public have the right to inspect District public records during regular business hours at District headquarters, in accordance with the California Public Records Act. Records may be reviewed onsite or requested electronically. The District will provide reasonable accommodations for inspection, including identifying an appropriate location within District facilities where records may be reviewed without disrupting normal operations.

Inspection shall occur under staff supervision to protect the integrity of District records and prevent the unauthorized removal, alteration, or destruction of documents. The District may establish reasonable rules regarding scheduling, handling, and reviewing records to ensure the security and orderly functioning of District operations.

Submitting A Request

Requests for public records may be submitted in person, by mail, or by email. Requests should reasonably describe identifiable records to enable District staff to locate them without extensive research or speculation.

The District will make reasonable efforts to assist requestors in identifying responsive records, including clarifying or narrowing broad requests when necessary. Staff may request additional information from the requestor to help locate records or determine whether the records are disclosable under applicable law.

Response Timeline
Upon receipt of a public records request, the District will provide an initial response within 10 calendar days, as required by law. The response may include:

- An acknowledgment of the request
- A statement whether records exist and will be provided
- A request for clarification or narrowing of the request if needed
- A notice of any anticipated withholding or exemption review
- In unusual circumstances such as reviewing large volumes of records, consulting other District departments, or determining applicable exemptions the District may extend the response period by up to 14 additional days. Written notice of the extension and the reason for the delay will be provided to the requestor.

Access & Production
The District will provide records in electronic format when feasible and when doing so does not compromise the integrity or security of the records or systems. If records are not readily available in electronic form, the District will allow in-person inspection. The District may provide hard copies at the direction of the requestor and for an appropriate materials fee.

Records may not be removed from District property without authorization. When records are inspected in person, a District staff member will be present to ensure security of the documents. Records may be redacted to protect information exempt from disclosure, with a written explanation of withheld or redacted materials provided as required by law.

Exempt Records
Certain records are exempt from disclosure under state or federal law and will not be released. When exemptions apply, the District will provide written notification identifying the legal basis for withholding records. Examples include, but are not limited to:

- Records subject to attorney-client privilege and attorney work product
- Personnel, medical, or similar files when disclosure would constitute an unwarranted invasion of personal privacy
- Security-sensitive information and critical infrastructure records
- Preliminary drafts not retained in the ordinary course of business and the withholding of such outweighs the public benefit of disclosure.
- Records compiled for litigation and law enforcement purposes

- Confidential water system, customer, and utility information
- Trade secrets and proprietary information

Temporary Delays
The District may temporarily delay access to records when it is necessary to locate the records, retrieve them from storage, review them for responsiveness or exemptions, or ensure staff availability to supervise review and maintain the integrity of District records. Records may also be temporarily unavailable when they are actively needed by District personnel in the performance of their duties.

Any temporary delay will be communicated to the requestor along with an estimated timeframe for availability, consistent with the California Public Records Act requirements for prompt access to public records.

Request Denials
If the District determines that any portion of a public records request is to be denied, the District will provide the requestor with a written response explaining the basis for the denial. The response will identify which records are being withheld, the specific legal authority supporting the denial or exemption, and the name and title of the District staff member responsible for the decision. If only part of a record is exempt from disclosure, the District will provide the non-exempt portions when reasonably segregable and will redact the exempt information, accompanied by an explanation of the legal reasons for the redaction. Written notice of denial will be provided as promptly as possible and in accordance with the timelines established by the California Public Records Act.

Record Request Form
The District will maintain a Public Records Request Form (Appendix A) to assist requestors in providing the information necessary for staff to efficiently identify responsive records. District staff will make the form available on the District website and to any individual who requests access to records and will assist in completing the form when needed.

All requests, including informal requests, will be processed in accordance with this policy and the California Public Records Act.

Cost
Cost The District may charge the requestor for the direct costs of reproduction and mailing for any document photocopied and delivered, but shall not charge for documents reproduced and transmitted solely by electronic means if the recipient is willing to accept the documents via email, or is willing to provide an electronic device upon which to copy the documents. If the District must compile records or extract information from an electronic record or undertake programming to satisfy a request, the requestor must bear the full cost thereof, not merely the direct cost of duplication. In the event the District will charge for the reproduction of the documents, the estimated cost will be communicated to the requestor prior to reproduction to ensure the requestor is willing to pay the required cost.

G. Appendix A – Public Records Request Form

Public Records Request Form

To expedite your request and to eliminate opportunities for error, please fill out this form completely with as much detail as possible and identify specifically the records you are requesting. Requests should reasonably describe identifiable records prepared, owned, used or retained by the District.

Please note that if you are requesting the opportunity to inspect records stored at this office, the District must be given time to locate and review documents that are responsive to your request in order to comply with the provisions of the Public Records Act. You will therefore be requested to make an appointment to return at a later date to view the documents.

REQUESTER INFORMATION	
Name:	Date:
Company:	Mailing Address:
City:	State/Zip Code:
Phone number:	Email address:

REQUESTED RECORDS

Time period covering documents requested: _____

___ I wish to inspect the requested records, where applicable, and do not want copies produced at this time.

___ I would like copies of the requested records.

_____

Signature of Requester