United States Department of the Interior

BUREAU OF RECLAMATION
2800 Cottage Way
Sacramento, CA 95825-1898

IN REPLY REFER TO:

CGB-100
1.3.11

VIA ELECTRONIC MAIL ONLY

State Water Resources Control Board
Division of Water Rights
Attn: Bay-Delta & Hearing Branch
P.O. Box 100
Sacramento, California 95812-0100

Subject: August 2026 Draft Water Quality Control Plan—Reclamation's Concerns as to the Solano Project.

Dear Chair Esquivel:

The Bureau of Reclamation (Reclamation) writes to express its concern with the State Water Resources Control Board (Board) August 2026 Draft Water Quality Control Plan (Draft Plan) for the Bay-Delta as it relates to the Solano Project, a project authorized under the federal Reclamation laws. Reclamation's letter to the Board, dated September 4, 2026, focused on the Draft Plan as it relates to the Central Valley Project (CVP). This letter is to confirm that Reclamation is concerned about all of its facilities, including non-CVP facilities, impacted by the Draft Plan like the Solano Project.

The United States built the Solano Project to provide reliable water supplies to Solano County farms, homes, and federal military installations such as Travis Air Force Base. Solano Project water deliveries have sustained Solano County communities and agriculture for nearly seventy-five (75) years. As drafted, the Draft Plan threatens the water supply of farms and communities throughout Solano County, including the cities of Fairfield, Suisun, Vacaville, Benicia, and Vallejo.

The Draft Plan would directly regulate Lake Berryessa, a United States owned facility and reservoir, by imposing unimpaired-flow and carryover-storage targets. Those requirements would limit use of substantial portions of stored water at Lake Berryessa and undermine reliable water supplies for Solano County farms and cities, including communities that provide housing for thousands of military personnel. The Plan would also subject Lake Berryessa operations to the Board's Executive Director approval of temperature-management strategies and annual operating plans. State law cannot subordinate federal project purposes to the approval, directives, or preferences of the Board or its Executive Director. The Draft Plan is inconsistent with and frustrates federal directives for the Solano Project which include providing a reliable, sustainable water supply for Solano County homes, farms, cities, and military installations.

Reclamation stands ready to support pathways for the reasonable protection of beneficial uses that protect and enhance water supply reliability at all of its facilities impacted by the Draft Plan, but as stated by

Acting Commissioner Bettencourt, we cannot support a plan that disregards federal law, negotiated certainty, and sound judgment. Reclamation continues to urge the Board to restore the foundational elements of the 2022 Memorandum of Agreement and Term Sheet.

Sincerely

ADAM NICKELS

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Date: 2026.09.18 16:34:47 -07'00'

Adam Nickels
Regional Director - Acting