



United States Department of the Interior

BUREAU OF RECLAMATION
Washington, DC 20240



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VIA ELECTRONIC MAIL ONLY

Mr. E. Joaquin Esquivel, Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: December 2025 Draft Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed (Draft WQCP); and Port Chicago Standard/Spring X2 developments

Dear Chair Esquivel,

The Bureau of Reclamation (Reclamation) signed the March 2022 MOU to advance the Healthy Rivers and Landscapes (HRL) program¹ that was executed in the Governor's office by Central Valley Project (CVP) contractors, state agencies, and various other parties from throughout California. Reclamation remains a party to this MOU and involved with the HRL program envisioned in the 2022 MOU. With that said, we recognize that since that time, the State Water Resources Control Board staff has deviated from important provisions in the MOU that need to be rectified this year in the final Bay-Delta Plan update.

The developments surrounding the Port Chicago spring X2 triggers in the Delta over the past two weeks are just the most recent example of how the system we all rely on is changing hydrologically, which increases the potential value of the Water Quality Control Plan in helping us adaptively manage to these more variable conditions. We associate ourselves with the recently expressed concerns of Reclamation's contractors and some in the California Congressional Delegation on the compliance requirements associated with spring X2.

Flow objectives that work flexibly and in tandem with habitat restoration and other ecological function improvements provide the best scientific approach to balancing beneficial uses and managing risk to water users and species alike from year to year. Studies and decades of monitoring have revealed that a flows-only approach has failed to achieve intended outcomes. The reliance on static flow prescriptions rather than adaptive, evidence-based strategies that integrate real-time ecological indicators and non-flow measures is not the best path forward.

We are committed to working with the parties to the 2022 MOU, CVP contractors, and other HRL interests to make the necessary changes to the draft WQCP to ensure that the commitments in the 2022 MOU are upheld and discussed in good faith. We also stand ready, together with our

¹ <https://resources.ca.gov/-/media/CNRA-Website/Files/NewsRoom/Voluntary-Agreement-Package-March-29-2022.pdf>

contractors, to constructively collaborate on preventing or minimizing the immediate implications of spring X2 for the 2026 water year. Unilateral alterations inconsistent with the 2022 MOU, or that impose unnecessary costs on finite water supplies, must be prevented in order to avoid counterproductive and destructive consequences among the HRL parties and the state as a whole.

We look forward to engaging further with the Board and the Board staff and the other parties to the 2022 MOU to advance our shared goals to develop and protect California's water resources for all beneficial uses.

Sincerely,

A handwritten signature in black ink, reading "Scott J. Cameron". The signature is fluid and cursive, with the first name "Scott" and last name "Cameron" clearly legible.

Scott J. Cameron

Principal Deputy Assistant Secretary for Water and Science
exercising the delegated authority of the Commissioner of
Reclamation

cc: Dorene D'Adamo, Vice Chair

Sean Maguire

Laurel Firestone

Nichole Morgan