



**Delta
Stewardship
Council**

A CALIFORNIA STATE AGENCY

February 2, 2026

Chair E. Joaquin Esquivel
State Water Resources Control Board
Division of Water Rights
Attn: Bay-Delta & Hearings Branch
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Delivered via email: SacDeltaComments@waterboards.ca.gov

RE: Comment Letter – Revised Draft Sacramento/Delta Bay-Delta Plan Updates

Dear Chair E. Joaquin Esquivel:

Thank you for the opportunity to review and comment on the State Water Resources Control Board's (Board) December 2025 revised draft of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed (revised draft Plan). We appreciate the Board's efforts to update the Bay-Delta Plan and consideration of our suggestions for strengthening the final Plan.

This letter provides the Delta Stewardship Council's (Council) comments on key elements of the revised draft Plan, with particular emphasis on ensuring that the final Plan:

Comments on the Draft Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed, Chair E. Joaquin Esquivel, January 29, 2026

- Be rooted in best available science.
- Include independent review of science actions and scientific monitoring surveys to inform adaptive management of the Plan.
- Support open, transparent, and collaborative science and information sharing.
- Work in concert with the Council's Delta Plan to advance the state's coequal goals.

As stated in previous letters (in [January 2024](https://rebrand.ly/ax9xs6) (rebrand.ly/ax9xs6) and [January 2025](https://rebrand.ly/uzys58f) (rebrand.ly/uzys58f)), the Council stands ready to contribute to the Board's implementation of the final Plan, particularly as it pertains to providing high-quality, independent, and relevant scientific review of actions and programs. These contributions are directly aligned with the Council's statutory mission and core functions.

About the Council

The Council is an independent state agency established by the Sacramento-San Joaquin Delta Reform Act of 2009, codified in Division 35 of the California Water Code, sections 85000-85350 (Delta Reform Act). The Delta Reform Act charges the Council with furthering California's coequal goals of providing a more reliable water supply for California and protecting, restoring, and protecting, restoring, and enhancing the Sacramento-San Joaquin River Delta (Delta) ecosystem. (Water Code, § 85054.) The Delta Reform Act further states that the coequal goals are to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (*Id.*) The Council is charged with furthering California's coequal goals for the Delta through the adoption and shared implementation of the Delta Plan. (Wat. Code, § 85300.) As part of the Council, the mission of the Delta Science Program is to provide the best possible unbiased scientific information to inform water and environmental management decisions for the Delta. This mission is carried out by funding research, synthesizing and communicating scientific information to policymakers and decision-makers, promoting independent scientific peer review, and coordinating with Delta resource management agencies to promote science-based adaptive management. (Wat. Code, § 85280(b)(4).)

Implementation of the Delta Plan's regulations and recommendations is critical to furthering the coequal goals and for fostering collaborative and relevant science supportive of the Plan.

Best Available Science

The Council's Delta Science Program (DSP) is charged with providing the best possible unbiased scientific information to inform water and environmental decision-making in the Delta. DSP advances this mission in support of the Council and its implementation of the Delta Plan, and in support of the broader community.

The Council recognizes the Board's addition to Appendix A in the revised draft Plan (section A.3.4) that defines best available science and appreciates the consistency with the Delta Plan's definition. The Council expects this important addition to strengthen the monitoring and science carried out in support of the updated Plan.

Science, Monitoring, and Review

There's a long legacy of science and monitoring in the Delta, much of which was prompted by previous SWRCB Water Rights Decisions, including D-1485 and D-1641, and which is supported by long-standing sampling programs underwritten by other state and federal agencies. Continuing that legacy, especially given forecasted climate changes, water supply reliability, and species distribution, is more important than ever. The Council appreciates the Board's recognition of the importance of that legacy and the need to strengthen it through the proposed establishment of the Bay-Delta Monitoring and Evaluation Program (BDMEP). In particular, the Board's proposed approach to regularly review monitoring surveys identified in the BDMEP to facilitate adaptive management of the Plan is consistent with the Delta Science Program's practices when supporting credible and relevant science in the San Francisco Bay-Delta Estuary.

To that end, we appreciate the science role outlined for DSP in the revised draft Plan: to provide scientific advice and support scientific review of monitoring surveys encompassed by BDMEP and other science actions in the Bay-Delta Plan (e.g., unimpaired flow compliance measures, procedures for adaptive methods, and the San Joaquin River Monitoring and Evaluation Program). This role aligns with DSP's statutory mission and functions, and DSP has a proven track record facilitating reviews of complex science and monitoring documents. **Should the Plan be adopted the Council looks forward to supporting the Board in the ways identified in the Plan as resources allow.**

Science Governance

The revised draft Plan stands to reshape the important but complex governance and organization of science and monitoring in the estuary, including through the BDEMP as well as the Healthy Rivers and Landscapes Science Committee. Further, the Plan update is happening amid a larger context of regional and federal changes to science and monitoring investments in the Delta. **The Council urges the Board to incorporate into the final Plan standards for ensuring the transparency of these venues to promote open and public engagement, collaboration and learning.** As a public-facing boundary organization, the Council regularly hosts and convenes public science venues and workshops and believes the collaborative venues in support of the Plan should be explicitly open and accessible.

Closing Comments

To review, we stand ready to support the Board with:

- Incorporating best available science into the final Plan, including through robust independent peer review of Plan actions.
- Promoting open and credible science venues in support of Plan implementation and adaptive management.
- Working together to meet the state's goals for the Delta through our respective Plans and collaborative efforts.

We also wish to express our support for the open and transparent process the Board has used to develop this Revised Draft Sacramento/Delta Bay-Delta Plan Update. The opportunity to provide input will contribute to a successful and forward-looking Bay-Delta Plan update.

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Council staff are available to discuss the comments and resources offered in this letter as the Board prepares the final Plan. Please contact me or have your staff contact Steven Culberson at steve.culberson@deltacouncil.ca.gov with any questions or needs.

Sincerely,

Jessica R. Pearson
Executive Officer