State Water Resources Control Board

February 19, 2026

Via Electronic Mail

Allison Febbo
General Manager
Westlands Water District
286 W. Cromwell Avenue
Fresno, CA 93755
afebbo@wwd.ca.gov
pubaffairs@wwd.ca.gov

Re: Port Chicago Standard

Dear Ms. Febbo:

The State Water Resources Control Board (State Water Board) is in receipt of Westlands Water District's (Westlands) letter dated February 5, 2026, that requests the suspension of the application of the Port Chicago objective under State Water Board Decision 1641 (D-1641) for February 2026. The State Water Board takes this opportunity to clarify that the provisions of D-1641 are vital and remain in effect, including the Port Chicago objective.

The State Water Board is currently in the process of updating the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan) to improve instream flows and other habitat conditions for the reasonable protection of fish and wildlife. As you are aware, there is a critical and scientifically well-documented need to improve ecosystem conditions and address chronic population-level declines of many listed and non-listed native California species. The State Water Board continues to work diligently and constructively with parties, including those participating in the Healthy Rivers and Landscapes (HRL) proposal, to make improvements in estuarine and tributary conditions.

Westlands, along with other public water agencies, the Department of Water Resources (DWR), and the Department of Fish and Wildlife (collectively, HRL Parties) proposed the HRL to the State Water Board in 2022 as an alternative implementation pathway for the Bay-Delta Plan. Importantly, HRL Parties understood and specified that the flows that would be provided under the HRL would be additive to flows required by D-1641.

The Port Chicago objective has been required by and implemented through D-1641 since that decision was adopted in 2001.

The Port Chicago objective is a Bay-Delta Plan Delta outflow requirement to maintain freshwater inflow sufficient to keep the low salinity zone (the isohaline, or point, at which salinity is measured 2 parts per thousand, also commonly referred to as "X2") further downstream in wetter years.[1] Higher Delta outflow levels cause the low salinity zone to be located further downstream into the shallow, nutrient-rich habitats of Suisun Bay, Suisun Marsh, and San Pablo Bay producing a greater extent of high quality habitat for a diverse array of native aquatic species. The Port Chicago objective benefits estuarine species by protecting shallow, nutrient-rich habitats, which boosts productivity, food availability, and habitat for fish and wildlife. The State Water Board developed the Port Chicago objective as part of a comprehensive public water quality control planning process to afford reasonable protection to fish and wildlife beneficial uses while considering all uses, including municipal and domestic supplies and agricultural supplies.

Longstanding scientific information establishes a positive relationship between downstream X2 positions (greater net Delta outflow) in winter-spring and a number of indicators of ecosystem health. The State Water Board's 2010 Delta Flow Criteria Report, 2017 Scientific Basis Report, 2023 Draft Staff Report, 2023 Supplemental Scientific Basis Report (jointly prepared by staff from the Board, DWR, and Department of Fish and Wildlife), and 2025 Limited Recirculation of the Draft Staff Report document numerous current and historic scientific studies showing the ecologically significant relationships between increased winter and spring (January through June) Delta outflows, and associated downstream location of X2, and the survival and abundance of numerous native aquatic species.

Current scientific information has enhanced understanding of potential mechanisms but has not altered the overall conclusion that higher winter-spring freshwater flows enhance the survival and population-level performance of native species. Staff have reviewed additional references, including those suggested by commentors following the release of the 2023 Draft Staff Report, and concluded no change to the overall conclusions of the 2017 Scientific Basis Report, 2023 Draft Staff Report, and the other reports referenced above.

The Board acknowledges that Westlands faces many historic water use and supply challenges. However, current hydrologic and storage conditions did not support the need to waive environmental requirements. As of February 17, 2026, each of the CVP and SWP reservoirs north of the Delta is above historical average and is nearing allowable flood control storage levels. San Luis Reservoir south of the Delta is also

[1] As part of the Bay-Delta Accord, the objective was formulated to be based on the prior month's hydrology to accommodate for reservoir operations. The objective also includes three possible methods of compliance (daily salinity, 14 day running average salinity, or 3-day running average NDOI) to provide flexibility in meeting the objective to reduce water supply impacts.

above historical average storage for this date and is expected to continue to fill due to the recent precipitation and recent increase in exports. The sum of positive Supplemental Project Water (SPW) released from CVP and SWP storage beginning in February is a reasonable estimate of the volume of surface water that has been needed to meet the Port Chicago objective. For the period of February 3 through 14, total positive SPW was approximately 100 thousand acre-feet (TAF). As of February 19, 2026, Net Delta Outflow Index (NDOI) is at 67,500 cfs, well above the Port Chicago requirement. Given significant current and incoming precipitation events, it is likely that the objective will be met incidentally by natural runoff and accretions for some time, very likely until the end of the month, and that any water supply cost from complying with the Port Chicago objective from earlier in the month may be ameliorated.

The State Water Board looks forward to working with all interested participants to forge a workable solution to the need for increased Bay-Delta flows, improved habitat conditions, and increased water supply reliability for California. To that end, the Board remains committed to updating the Bay-Delta Plan by the end of the year. Updating the Bay-Delta Plan, including the HRL parties' commitment to build upon D-1641, provides an opportunity to improve science driven decision-making to inform the future of water management.

Sincerely,

Eric Oppenheimer
Executive Director, State Water Resources Control Board

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