THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Committee Item
INFORMATION

One Water and Adaptation Committee

9/14/2026 Committee Meeting

6b

Subject

Update on the Bay-Delta Water Quality Control Plan

Executive Summary

This item provides an update on the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan). This item was last reviewed with the Subcommittee on Imported Water on January 27, 2026, shortly after the draft Bay-Delta Plan was released in December 2025. On August 19, the State Water Resources Control Board (SWRCB) released the revised final draft of the Bay-Delta Plan for a 30-day public review period with comments due September 18. The SWRCB will consider adopting the updated Bay-Delta Plan at a public hearing on October 28-29. This Bay-Delta Plan is intended to include the Healthy Rivers and Landscapes (HRL) Program where participating water users can meet the Bay-Delta Plan objectives through a combination of flow and habitat actions rather than a requirement to release a portion of unimpaired flows.

Fiscal Impact

None

Applicable Policy

By Minute Item 52831, dated May 10, 2022, the Board voted to express support for developing the Voluntary Agreement approach, now known as the Healthy Rivers and Landscapes program, as an alternative in the Water Board's proposed update to the Bay-Delta Plan.

Details and Background

Bay-Delta Plan Background

The SWRCB is currently updating the Bay-Delta Plan. The Bay-Delta Plan establishes water quality objectives for the protection of designated beneficial uses. The designated beneficial uses include agriculture, urban, municipal, and environmental. The current update is proposing the adoption of several new beneficial uses that address tribal interests.

The current update to the Bay-Delta Plan has been in development for approximately 18 years. Phase 1 of this Bay-Delta Plan update was approved in 2018 and addresses water quality for the San Joaquin River and salinity objectives in the south Delta. The implementation decision for Phase 1 of the Bay-Delta Plan amendment is pending. The current Phase 2 update to the Bay-Delta Plan includes the Sacramento River, its tributaries, and the Delta.

This Bay-Delta Plan (Phase 2) update will add several new narrative water quality objectives for the protection of fish and wildlife. These objectives would be implemented through multiple pathways, and the implementation responsibility is shared more broadly than it is in the current Bay-Delta Plan, where implementation responsibility is borne solely by the State Water Project and the Central Valley Project. Under the updated Bay-Delta Plan, the new narrative objectives would be implemented by a combination of parties' participation in the HRL Program, or

by meeting flow obligations based on a percentage of the unimpaired flow (UIF) for non-HRL parties (or if HRL is not adopted). Both would be in addition to meeting the existing in-Delta water quality standards and "other actions" by agencies.

Implementation Options for the Narrative Objectives

The UIF approach considers the quantity of water entering the headwaters of each watershed and requires that a large percentage of that water (35 percent-65 percent) be protected from diversions and be left in stream to become Delta outflow. An implementation approach for UIF would be developed and adopted within two years of plan approval. If the entire watershed were subject to the UIF approach, the SWRCB modeling indicates the water cost to Metropolitan's service area would be an average of 276 thousand acre-feet per year.

The HRL Program would be implemented in parallel with UIF, and water diverters can voluntarily opt into the HRL Program as an alternative to UIF. The HRL Program was developed in a collaborative manner as an approach that more thoroughly incorporates science, addressing a wider range of factors that are negatively impacting the watershed, not just river flows. The HRL Program provides new Delta outflow and large-scale habitat enhancement projects to be managed in a collaborative, science-based manner with identified long-term funding from HRL participants and the state. HRL was developed with every major water diverter in the Bay-Delta watershed and state government that includes the California Natural Resources Agency, the California Department of Fish and Wildlife, the Department of Water Resources (DWR), and the California Environmental Protection Agency. It is supported by a broad coalition of state, federal, and local water agencies.

The formal effort to develop what is now the HRL Program began in mid-2018, when DWR, the US Bureau of Reclamation (Reclamation) and various water diverters and contractors worked to develop the framework for an alternative program. The framework for the HRL Program was presented to the SWRCB in December 2018, and the SWRCB directed the parties to more fully develop the program as an alternative implementation pathway to be included in the Bay-Delta Plan Phase 2 update. In 2022, HRL parties, including state agencies, drafted and signed a Memorandum of Understanding and Term Sheet (2022 MOU) that detailed terms to advance the HRL Program. Metropolitan is a signatory to that 2022 MOU.

Current Status

Since 2018, the SWRCB has been attempting to incorporate the HRL Program into the various planning and environmental documents including successive drafts of the Bay-Delta Plan, Staff Report, and Scientific Basis Report. The SWRCB and the HRL parties have extensively discussed the draft documents, with lack of consistency between the various drafts and the 2022 MOU being a major point of contention.

The SWRCB issued its draft Bay-Delta Plan update in December 2025 and held a hearing in January 2026. Metropolitan provided significant comments on this draft as both Metropolitan and through the State Water Contractors. On August 19, the SWRCB released the revised final draft of the Plan for a 30-day public review period with comments due September 18. The SWRCB will consider adopting the updated Bay-Delta Plan at a public hearing on October 28-29. Metropolitan staff is reviewing this document and will be providing a high-level summary of the plan and intent for this committee meeting.