



February 17, 2026

Governor Gavin Newsom
1021 O Street, Suite 9000
Sacramento, CA 95814

Dear Governor Newsom,

The Coalition for a Sustainable Delta is writing to express grave concerns about the continued enforcement of the Port Chicago X2 standard, implemented through State Water Board Decision 1641 (D-1641). This standard imposed on the State Water Project (SWP) and Central Valley Project (CVP) requires the federal and state governments to manage reservoirs upstream of the Sacramento-San Joaquin Delta and water exports from the Delta to ensure that the location where freshwater and brackish water mix – that is, the location of the low salinity zone measured as the two parts per thousand isohaline – is Port Chicago.

On February 1, 2026, freshwater quality conditions in the Delta narrowly triggered the Port Chicago X2 standard defined in D-1641. As you know, the State Water Board adopted D-1641 in 1999 based on scientific analyses that pre-date the State Board's action. Under the Port Chicago X2 standard, the SWP and CVP are required to release significant volumes of freshwater that cannot be recovered to supply our cities, farms, and wildlife refuges in order to maintain salinity levels at Port Chicago, downstream of Suisun Bay.

In 2026, these releases could total up to 600,000 acre-feet of water. In 2023, participants in the Collaborative Science and Adaptive Management Program, agreed that the marginal value of an acre-foot of water was \$815. At this value, the economic cost of the Port Chicago Action will approach \$500 million in 2026 alone. The loss of 600,000 acre-feet is particularly consequential given low snowpack and drier than average conditions in California.

When it was adopted over 25 years ago, the Port Chicago X2 standard was intended to protect the Delta's food web, particularly species like Delta Smelt that inhabit the Delta's low-salinity zone. But since that time, there have been major changes to the Delta ecosystem, including invasive clam infestations that have altered the food web and hastened the decline of the Delta Smelt population to a point at which it is functionally extinct in nature. In addition, there have been major scientific advances that call into question the premise for the Port Chicago X2 standard and whether meeting the standard contributes to the survival or performance of any listed fish species in the upper San Francisco Estuary.

Just over a year ago, you issued Executive Order N-16-25 requiring the State Water Board and other agencies "to identify any obstacles that would hinder efforts to maximize diversions to storage of excess flows that become available as a result of the anticipated winter storms, to remove or minimize such obstacles wherever possible, and to promptly report to my office any additional statutory or regulatory barriers that should be considered for suspension."



Surely, implementation of the Port Chicago X2 standard, which is presently imposing certain, enormous costs on the State of California and its citizens while yielding questionable benefits based on outdated environmental conditions and scientific information, is contrary to your order. For this reason, we urge you to take action to provide the SWP and CVP with immediate relief from the Port Chicago X2 standard.

We appreciate your consideration of our input and your Administration's continued effort to ensure that water-management decisions are informed by the best available scientific information and are undertaken in a manner that optimizes the use of our finite resources.

Sincerely,



Brad Samuelson

Cc: E. Joaquin Esquivel, Chair, State Water Resources Control Board
Karla Nemeth, Director, Department of Water Resources

