
State Water Resources Control Board

January 22, 2026

Ann Carroll
General Counsel
Department of Water Resources
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Re: Procedural Ruling on Request for Additional Information to Supplement the Administrative Record in the Hearing on the Proposed Delta Conveyance Project

Dear Ms. Carroll,

This letter responds to the December 22, 2025 letter from the Department of Water Resources (DWR) to the Administrative Hearings Office (AHO) of the State Water Resources Control Board (State Water Board or Board). DWR's December 22 letter responds to prior letters from the AHO dated November 10, 2025, and October 10, 2025, which directed DWR to submit additional information to clarify and supplement the administrative record for the hearing on the proceeding on the pending petitions to change water right Permits 18478, 16479, 16481, and 16482, for the proposed Delta Conveyance Project (DCP).

SacWAM Unimpaired Flow Modeling

The AHO's November 10 letter directed DWR to provide the updated SacWAM model that DWR intended to use to generate an unimpaired flow (UIF) timeseries, the generated UIF timeseries, and a technical memo detailing the methods and approach used for the analyses, for review by the AHO.

The AHO received the technical memo linked in the December 22, 2025 letter from DWR and associated modeling files. The updated SacWAM model and technical memo appear to describe a reasonable approach to the SacWAM unimpaired flow modeling. The AHO accepts DWR's use of the submitted SacWAM UIF timeseries in CalSim 3, as described in DWR's November 3, 2025 letter, to conduct model runs that incorporate a percentage of unimpaired Delta outflow as bypass flow requirements as directed in the AHO's October 10 letter.

Interpolation of Unimpaired Flow Increments

The AHO directed DWR to submit model runs incorporating a percentage of unimpaired Delta outflow as bypass flow requirements ranging from 35 to 65 percent of unimpaired flow in 5 percent increments. The request allows DWR to submit model runs in 10 percent increments if DWR demonstrates that linear interpolation of data between modeled 10 percent increments is appropriate.

DWR ran preliminary CalSim 3 studies with bypass flow requirements of 35, 45, 55, and 65 percent of unimpaired Delta outflow. DWR reviewed results for State Water Project (SWP) exports at Banks Pumping Plant, including DCP exports, and Delta outflow to determine whether linear interpolation between the results of the 10 percent increment runs is appropriate to estimate results at intervening 5 percent increments. DWR submitted two figures showing the results for SWP exports at Banks Pumping Plant and Delta outflow, with linear trend lines. DWR concluded that results for the 5 percent increments could be interpolated from the CalSim 3 studies for 35, 45, 55, and 65 percent of unimpaired Delta outflow. Based on the results and the fit of the trend lines, the AHO accepts DWR's proposal to produce results in 10 percent increment runs.

Bookend Approach

DWR proposed in its December 22 letter, a bookend approach for the requested tables for DSM2 model results for average stage, source water fingerprinting, bromide, chloride, EC, CHABs, and selenium, by providing results for only the 35 and 65 percent scenarios. As stated above, at this time, the AHO is limiting its request to model runs at 10 percent increments. Interpolation of the DSM2 model results at greater than 10 percent Delta outflow increments may not, however, be appropriate. To ensure a timely and adequate evidentiary record for consideration by the Board, the AHO directs DWR to submit the requested DSM2 model results for each parameter for 35, 45, 55, and 65 percent of unimpaired Delta outflow by February 20, 2026.

Sincerely,



Nicole L. Kuenzi
Presiding Hearing Officer
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State Water Resources Control Board

Attachments:

- Attachment 1 – Service List

**ATTACHMENT 1
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