

Chapter 1

Introduction to Responses to Comments

On September 28, 2023, the State Water Resources Control Board (State Water Board) released the *Draft Staff Report/Substitute Environmental Document in Support of Potential Updates to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary for the Sacramento River and its Tributaries, Delta Eastside Tributaries, and Delta* (2023 draft Staff Report) for public review and comment. On December 12, 2025, the State Water Board initiated a limited recirculation of the draft Staff Report by releasing a new Chapter 13, *Revised Proposed Plan Amendments*, that included an updated project description and built upon the analyses included in the 2023 draft Staff Report (2025 partially recirculated draft Staff Report).

The State Water Board held additional or concurrent comment periods on the potential draft updates to the *Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed* (Bay-Delta Plan). The State Water Board released drafts of the Bay-Delta Plan in October 2024, July 2025, and December 2025. With the release of the final Staff Report, the State Water Board also released the final draft Plan for additional comments prior to consideration of adoption.

This Volume 3, *Responses to Comments*, contains responses to comments received on the Staff Report, including the 2023 draft Staff Report and the 2025 partially recirculated draft Staff Report. It also contains responses to comments received on the July 2025 and December 2025 revised drafts of the Bay-Delta Plan. Prior to consideration of adoption of Sacramento/Delta updates to the Bay-Delta Plan, the State Water Board will consider the responses to comments in Volume 3, along with Volume 1 (Staff Report chapters) and Volume 2 (Staff Report appendices), all of which are part of the final Staff Report. (Cal. Code Regs., tit. 23, § 3779.5.)

This chapter describes the organization of Volume 3. The responses to comments provided in this volume represent the State Water Board's best effort to carefully and objectively review and consider all comments and supporting evidence provided by commenters.

Organization of This Volume

All chapter references that appear in Volume 3 are in reference to chapters in Volume 1 of the final Staff Report, unless otherwise noted. Volume 3 of this final Staff Report contains the following chapters.

- Chapter 1, *Introduction to Responses to Comments*, (this chapter) describes the format, content, and organization of Volume 3, and includes an overview of common terms used throughout the responses to comments.
- Chapter 2, *Common Responses*, contains common responses to comments. The State Water Board prepared common responses to provide comprehensive responses to frequently raised topics, themes, or issues, and to avoid repetition. If one or more common responses apply to an individual comment, the response to that comment refers the commenter to the relevant common response(s). The introduction to Chapter 2 contains a summary table identifying the common responses and a general description of the topics addressed by each common response. Common Response 1.1, *General Comments*, describes the approach the State Water Board took

when identifying, considering, and responding to the large volume of comments received on the Staff Report and drafts of the Bay-Delta Plan.

- Chapter 3, *Indices of Commenters*, provides a list of the comment letter numbers and, when provided, the associated commenter names, organizations, and titles of commenters. These indices are organized by organization type, commenter name, and letter number. In addition, the index of primary forms is provided to allow submitters of form letters to locate the responses to their comments. Readers should use these indices to identify the letter number or numbers associated with their submissions and then find the comments and responses in the comment response tables that are contained in Chapter 4.
- Chapter 4, *Responses to Comments Tables*, presents comments and responses in a tabular format organized in numerical order. Any misspellings, grammatical errors, or unintelligible writings in comment letters or inaudible oral comments were not corrected and remain in the comment field of these tables. Comments were assigned an identifying letter number. Chapter 4 also provides a list of references cited in the responses to individual comments.¹

Terminology

This section describes terms used throughout Volume 3 in the responses to comments.

As described in Volume 1, Chapter 1, *Executive Summary*, the State Water Board is considering amendments to the Bay-Delta Plan focused on the reasonable protection of fish and wildlife in the Sacramento River and its tributaries, Delta eastside tributaries (including the Calaveras, Cosumnes, and Mokelumne Rivers), and Delta (referred to as the Sacramento/Delta watershed). This effort is referred to as the *Sacramento/Delta update to the Bay-Delta Plan*. The draft amendments to the Bay-Delta Plan are reflected in documents referred to as the “draft Plan” or “revised draft Plan.” These amendments are the specific proposed changes to the text of the Sacramento/Delta portions of the Bay-Delta Plan.

The proposed project, referred to as the revised proposed Plan amendments, is evaluated in Chapter 13, *Revised Proposed Plan Amendments*, of this Staff Report. The revised proposed Plan amendments include a regulatory pathway based on the proposed Plan amendments described in Chapter 5, *Proposed Changes to the Bay-Delta Plan for the Sacramento/Delta*, with modifications, and a voluntary agreement (VA) pathway that would provide a pathway for implementation of VAs (also referred to as the Healthy Rivers and Landscapes proposal) that were described and analyzed in Chapter 9, *Proposed Voluntary Agreements*, of the 2023 draft Staff Report. The pathways incorporate aspects of other alternatives that were evaluated in the 2023 draft Staff Report. The revised proposed Plan amendments are reflected in the final draft Plan that will be considered for adoption by the State Water Board.

After the VA Memorandum of Understanding (MOU) was submitted and during the development of the 2023 draft Staff Report, the proposed VAs were renamed “Healthy Rivers and Landscapes” or “HRL” by the VA proponents, also referred to as the “HRL participants.” The term “VA pathway” is used to refer to the regulatory provisions in the Bay-Delta Plan that would allow for implementation of the HRL commitments.

¹ References in Volumes 1 and 2 of the Staff Report are contained at the end of each chapter or appendix and have been updated to reflect any changes made in the chapter or appendix, as appropriate, in responding to comments.