



SIERRA CLUB
LOMA PRIETA CHAPTER



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

August 21, 2023
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, CA 95118

Re: August 22, 2023 Board Agenda Item 8.1, Receive Information on the Pacheco Reservoir Project

Dear Valley Water Board of Directors,

Sierra Club California and the Loma Prieta Chapter's Water Committee advocate for the protection of natural ecosystems and sustainable water supplies. We thank staff for putting together a detailed schedule for the Pacheco Reservoir project which will be very helpful for tracking this project as long as it keeps moving forward.

For the record, the Sierra Club supports all the comments submitted by Soluri Meserve on August 16, 2023. The Lost Opportunity Costs analysis raises many questions. Here are a few of our concerns for now.

1. It seems unusual to do additional analysis to justify a project midstream. The benefits of this project for Valley Water and Santa Clara County are water supply benefits and therefore should be justified through the Water Supply Master Plan. Aside from emergency water supply, the lost opportunities largely provide benefits outside of Santa Clara County and do not benefit ratepayers or taxpayers.
2. The analysis is completely opaque and the results are questionable, especially the \$1.7 billion benefit for Steelhead. There is clearly a risk that the additional flows provided by this project will not substantially increase the population of Steelhead in the Pajaro River or in Pacheco Creek. Valley Water does not have a good track record of increasing Steelhead populations in other watersheds, even 20 years after a settlement agreement was signed to do so. We would like to see how this was evaluated.
3. If the District is going to rely on this analysis to justify continuing with this project, the analysis needs to be documented and made available for review and comment. Valley Water should welcome independent input from technical experts about the assumptions, data, models, etc. used to calculate opportunity costs.
4. Lastly, there are alternatives for all the opportunities discussed. For example, Los Vaqueros Reservoir or San Luis Reservoir could alternatively be used for emergency supplies. What is needed is an alternatives analysis to provide the costs vs. benefits and the risks for the Pacheco Reservoir compared to the alternatives.

For the sake of transparency, please ask staff and consultants to document the Lost Opportunity Costs analysis and invite anyone who commented on the Pacheco Reservoir DEIR to review and provide feedback. Otherwise, the numbers presented in the staff report are not credible.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Katja Irvin".

Katja Irvin
Water Committee Co-Chair
Sierra Club Loma Prieta Chapter

A handwritten signature in cursive script that reads "Molly Culton".

Molly Culton
Chapter Organizing Manager
Sierra Club California