

July 19, 2024

Via electronic mail: tsexauer@valleywater.org

Santa Clara Valley Water District
Attention: Todd Sexauer
5750 Almaden Expressway
San Jose, CA 95118

RE: Pacheco Reservoir Expansion, Draft IS/MND; Geotech investigations

Dear Valley Water Directors and Mr. Sexauer:

We appreciate the opportunity to comment on the draft IS/MND and geotechnical investigations being considered for the Pacheco Reservoir Expansion project.

Unfortunately, unreasonable amounts of time and money are being spent on the high-cost, culturally and environmentally destructive proposed Pacheco Reservoir Expansion and dam construction (“Pacheco”). Funding yet more investigations and tests for this unnecessary project is not justifiable. Those funds should instead be spent on projects that promote local sustainable water, as mandated fifteen years ago in the Delta Reform Act—not on new storage for yet more imported Delta water. Other increases in storage (expansion projects at San Luis Reservoir and Los Vaqueros Reservoir, groundwater banking) would be far less expensive and would better serve residents of our county.

Pacheco Reservoir expansion is an extremely costly proposition that is not needed, making further expenditures on preliminary geological testing unwarranted. In 2023, Valley Water determined the Preliminary Lifecycle Storage Capacity Cost of Pacheco to be \$20,149/af, more than one and one-half times the cost of the next-highest calculated water source. (See: Valley Water’s Board of Director’s September 19, 2023, Agenda item 2.1, Attachment 4 PowerPoint, page 22 of 29.) The inexorably rising costs of Pacheco militate against further funding for this project—or its preliminary tests, which could last for two years.

California is looking to efficiency and lowered demand to secure our water future. For instance, State Water Resources Control Board’s (SWRCB) new regulation (approved about two weeks ago) requires suppliers to “adopt standards ... for the efficient use of water and performance measures for commercial, industrial, and institutional (CII) water use.” SWRCB’s regulation would “save approximately 3.9 million acre-feet of water from 2025 to 2050 – savings attributable to the proposed regulation only.”

<https://www.waterboards.ca.gov/conservation/regs/docs/2024/sria.pdf>

Instead of seeking to expand an unsuitable dam, Valley Water should look to improve efficiency through groundwater recharge, wastewater recycling and reuse, along with stormwater capture and reuse.

In fact, the SWRCB documents declining water use in California. (According to the SWRCB, “[b]etween 2022 and 2050, per capita urban water use is projected to further decrease by 17.9 percent absent the [approved] regulation, and by as much as 21.8 percent under the [approved] regulation.”) Efficient use and other conservation measures will supply adequate water for Santa Clara County and its neighbors. (The SWRCB also estimates \$1.5 billion in savings from the implementation of its new regulation, compared with costs of its implementation.)

Environmental losses from the Pacheco proposal include inundation of over 1,500 acres of sensitive natural communities in a wildland that is home to endangered species and native plants. Geotech investigations would disturb native species with drilling and borehole digging. Irreplaceable cultural tribal resources are at risk; thousand-year-old petroglyphs and sites of traditional tribal observations would be lost.

With water use declining and the exorbitant cost of Pacheco inexorably rising, better options exist. New conservation regulations will continue to drive water use lower. There is no need for incredibly expensive storage options like Pacheco that will only increase costs, decrease water quality and cause irremediable cultural and environmental losses.

Sincerely,

Alan and Meg Giberson