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July 16th, 2024

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

Reject Draft Initial Study and Mitigated Negative Declaration for the Design Level Geotechnical Investigations for the Pacheco Dam Project

Dear Mr. Sexauer,

Save Mount Diablo (SMD) is a nationally accredited land trust founded in 1971 with a mission to preserve Mount Diablo's peaks, surrounding foothills, watersheds, and its sustaining Diablo Range. We accomplish this through land conservation and management strategies designed to protect the mountain's natural beauty, biological diversity, and historic and agricultural heritage; enhance our area's quality of life; and provide educational and recreational opportunities consistent with protection of natural resources.

We acquire land, or interests in land, for conservation purposes and often for addition to parks on and around Mount Diablo. We are involved in land use planning, policy and advocacy which might affect protected lands. We build trails, restore habitat, and are conduct environmental education. In 1971, there was just one park on Mount Diablo totaling 6,778 acres; today there are almost 50 parks and preserves around Mount Diablo totaling 120,000 acres. We include more than 11,000 donors and supporters.

We write this letter to share concerns regarding the Draft Initial Study and Mitigated Negative Declaration ("MND") prepared by the Santa Clara Valley Water District ("Valley Water") for the Design Level Geotechnical Investigations for the Pacheco Dam Project.

We do not support the Pacheco Dam project that the investigations are intended to support. This controversial new dam project would be environmentally damaging and is also not affordable for Valley Water ratepayers. Valley Water should be working to secure water supplies by doing more groundwater recharge, recycling and reusing wastewater, capturing and treating stormwater, and undertaking other water conservation measures. In addition, Valley Water's existing reservoirs need to be maintained and improved to meet current standards. To the extent additional water storage is needed, reservoir expansion projects already underway at San Luis Reservoir and Los Vaqueros Reservoir are more likely to occur, are a better investment and would be more likely to provide a measure of climate resilience for Valley Water.

Pacheco Pass is an unsuitable location for a new dam, which is exhibited by the fact that plans for a new dam in this area have never progressed. This area designated for the new Pacheco Dam is geotechnically unstable, which is one reason the existing small dam operated by the Pacheco Pass Water District has been declared unsafe by the Division of Dam Safety. Building another larger dam in this same area would be terribly expensive and risky, with potentially catastrophic consequences in the event of an earthquake.

With respect to the geotechnical investigations proposed to begin this summer, we have the following comments:

- The MND fails to disclose the full range of likely impacts from drilling 149 borings, digging 27 test pits and conducting other invasive tests in this rural wildlife-rich area. The project area includes important habitat for Bald eagles, Golden eagles, Monarch butterflies, California condors and other animals.
- The MND fails to account for the full extent of disturbance caused by using trucks and helicopters to conduct hundreds of “rig days” over the course of 1-2 years. The project area serves as an important wildlife corridor that would be disturbed by the project’s noisy activities.
- The mitigation and other measures provided in the MND are inadequate to mitigate the identified impacts to less than significant levels. As a result, a full environmental analysis would be necessary for the geotechnical investigations to proceed.

For these reasons, we urge Valley Water to reject the MND and deny the geotechnical investigation project.

Please add me name to the notice list for this project.

Thank you for considering our comments.

Regards,

Juan Pablo Galván Martínez
Senior Land Use Manager