

April 25, 2025

Via email: [DLGI@valleywater.org](mailto:DLGI@valleywater.org); [Tsexauer@valleywater.org](mailto:Tsexauer@valleywater.org)

Santa Clara Valley Water District  
Attention: DLGI Draft EIR Comments  
5750 Almaden Expressway  
San José, CA 95118.

**RE: Comments on the Draft Environmental Impact Report for Design Level Geotechnical Investigations for the Pacheco Reservoir Expansion Project**

Dear Directors and staff:

We write concerning the DEIR for the Design Level Geotechnical Investigations for the Pacheco Reservoir Expansion Project (PREP or project), which should be rejected as premature for failure to consider the whole of the project, which is required under CEQA, as well as for cost and environmental analysis deficiencies.

The extraordinary and unjustified project costs are unnecessary, as better, less expensive, and less environmentally destructive projects would serve to fulfill project goals.

Costs have ballooned since the project's inception and will continue. The \$2.2 billion total uninflated project cost—referred to in SCVWD's March 11, 2025, Agenda item 8, Attachment 2, FAQs—will have doubled by the proposed construction completion date of 2035, given the California Construction Cost Index (CCCI) average from recent years. The \$2,749,313,000 Total Project Cost with Inflation in the CIP would make that total even higher.

Proposing and continuing to pursue this PREP is taking resources away from more productive solutions. This PREP wastes not only taxpayer and ratepayer money, but also takes staff resources away from more sustainable projects that could address water supply through nonstructural, natural, nature-based features, as well as better-planned projects such as the San Luis Reservoir (Sisk Dam) retrofit project. Valley Water (SCVWD) is still pursuing Pacheco despite Valley Water staff's having deemed Pacheco the highest-cost water source project—and second-highest in implementation uncertainties.<sup>1</sup>

The lack of project partners to date, the extraordinary costs, the environmental harms detailed by environmental groups, the failure adequately to consider tribal and cultural concerns all point to abandonment, not continuation of the PREP.

Respectfully,

Alan and Meg Giberson

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<sup>1</sup> Valley Water's staff report for Agenda dated 5/10/2021, File No. 21-0462, Item No. 4.3, p. 46