

From: [Kelly Larsen](#)
To: [DLGI](#)
Subject: RE: Draft Environmental Impact Report (EIR) for the Design Level Geotechnical Investigations for the Pacheco Reservoir Expansion Project
Date: Thursday, April 17, 2025 2:15:54 PM

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April 17, 2025

Santa Clara Valley Water District
Attention: DLGI Draft EIR Comments
5750 Almaden Expressway
San Jose, CA 95118
Tsexauer@valleywater.org

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

Dear Mr. Sexauer:

These comments pertain to the Draft Environmental Impact Report for the Design Level Geotechnical Investigations for the Pacheco Reservoir Expansion Project (Draft EIR) that Santa Clara Valley Water District (Valley Water) has released for public review. The geotechnical work for the Pacheco Dam would have adverse environmental effects that are not adequately addressed in the Draft EIR, as described below.

- 1. Disturbance to Wildlife:** The geotechnical activities would take place in an area with multiple wildlife corridors, and involve noisy helicopters and heavy equipment, which would disrupt sensitive wildlife habitats. The Draft EIR concludes that the project impact on wildlife movement is insignificant without mitigation. (Draft EIR, p. 3-168.) Noise is an impact on and a deterrent to wildlife movement. The combined effect of vehicle traffic, human presence, and equipment operation may result in diversion of wildlife away from this movement corridor. Diverted wildlife may face greater incidences of mortality on the nearby State Route (SR) 152.
- 2. Disruption of Tribal Cultural Resources:** In addition to wildlife impacts, the proposed investigations would potentially disturb cultural resources, some of which may be over 3,000 years old. This presents a grave concern for the local Native American tribes. Valley Water must engage in a complete and good faith discussion with tribes that attach cultural significance to tribal cultural resources in the project area.
- 3. Incomplete Environmental Review:** While the Draft EIR was prepared for the geotechnical investigations, Valley Water has acknowledged that the 2021 Draft EIR for the entire Pacheco Dam Project needs to be revised and recirculated. The geotechnical work is a necessary and foreseeable element of the overall dam project, and should be analyzed together with the reservoir expansion project itself, to avoid improper piecemealing. (CEQA Guidelines, § 15376(a).)
- 4. Poor Financial Management:** Valley Water has demonstrated a lack of cost control for the Pacheco Dam project, the costs of which will only continue to rise. As explained at

the June 2024 Board meeting, projected project costs have ballooned to over **\$5 billion (with interest)**, with more than **\$80 million** already spent. This is a waste of ratepayer and taxpayer money that could be better spent on sustainable water solutions that won't destroy the environment.

For these reasons, I urge Valley Water not to certify the Draft EIR or move forward with the geotechnical investigations for this destructive dam project.

Kelly Larsen