SIERRA CLUB
LOMA PRIETA CHAPTER

SIERRA CLUB
CALIFORNIA

October 21, 2021

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

Via email to:
Clerk of the Board <clerkoftheboard@valleywater.org>
Tony Estremera <testremera@valleywater.org>
John Varela <jvarela@valleywater.org>
Barbara Keegan <bkeegan@valleywater.org>
Richard Santos <rsantos@valleywater.org>
Linda LeZotte <llezotte@valleywater.org>
Nai Hsueh <nhsueh@valleywater.org>
Gary Kremen <gkremen@valleywater.org>

Re: Valley Water October 22, 2021 Special Meeting
Item 2.1 Water Supply Master Plan Monitoring and Assessment Program Update 2021

Dear Chair Estremera and Board Members,

The Sierra Club Loma Prieta Chapter and Sierra Club California have been advocating to mitigate the environmental impacts of human water use in California and in Santa Clara County for many years. We commend Valley Water for continuing to analyze and monitor the 2040 Water Supply Master Plan (WSMP) to make sure the water supply investment portfolio provides a sustainable, resilient, and cost-effective water supply for Santa Clara County.

Please consider the following comments which we hope will provide a useful external perspective on the Monitoring and Assessment Program Update and water supply planning for Santa Clara County.

Water Supply Project and Portfolio Evaluation

The scenarios based on the Water Supply Master Plan make sense, but we think it would be extremely useful to include the BF Sisk Dam Raise and Reservoir Expansion Project (San Luis Reservoir) in this analysis. How much new storage will this project provide for Valley Water at what cost compared to the storage projects that were analyzed (i.e. how does it compare to the projects listed in *Table 1. Storage Diversification Options*)? In general, how much or how little does the project move the needle toward the water supply reliability goals of the Water Supply Master Plan?

Figure 2. Modeled use of storage compared to existing storage capacity for the year 2045 under a median climate change scenario shows that Pacheco Reservoir itself and portfolios that include Pacheco are less effective in meeting level of service goals compared to portfolios that include increased recycling. There is still great potential for wastewater recycling in Santa Clara County and we encourage Valley Water to expand both onsite and regional recycling for both potable and non-potable reuse as much as possible.

The analysis provided in the PowerPoint presentation further indicates that new storage such as Pacheco Reservoir is of questionable value, since even current storage facilities are unlikely to be fully utilized. The good news is that the current storage is projected to be sufficient given decreased demand projections and local planned supply projects such as conservation, recycling, and stormwater capture. The main point in favor of continuing to pursue the Pacheco Reservoir project is to improve operation flexibility, but given the projected overall decrease in imported water supplies this seems uncertain and questionably worth the extremely high investment in a speculative project which could easily become a very expensive stranded asset.

Delta Conveyance

Regarding the Delta Conveyance project, the staff report says:

> "Valley Water is working with external partners on developing the Delta Conveyance Project. Currently, modeling results are not available to quantitatively evaluate how the project may support water supply reliability and how it could influence Valley Water's ability to exercise its storage. However, it is **expected to provide increased imported water deliveries, especially during wet years**. This project could help improve our ability to exercise Valley Water's storage capacity, especially if Valley Water diversifies its storage portfolio to provide for greater "put" capacities."

It would be good to have more information about what increased imported water deliveries means. Is the District expecting more than the current maximum deliveries under our CVP and SWP contracts, or just to get closer to the maximum allowed under those contracts? If the District is expecting to get more, what approvals are needed such as updated contracts or water rights?

Additionally, according to the 2021 Delta Stewardship Council Final Vulnerability Assessment, climate change will make Delta water exports less reliable in the future (regardless of wet or dry years). Recent events have shown that climate change is accelerating, and that impacts that are forecast for the latter half of the century may be happening now. The best available science shows that the Delta Conveyance Project is a costly and high-risk project that will not deliver what it promises.

Risk Assessment

The Risk Assessment analysis in Figure 3 and Figure 4 shows Valley Water should do everything possible to avoid the need for the Pacheco Dam and Delta Conveyance projects. These projects are likely to continue to hit snags and are unlikely to be in service by the end of the 2040 WSMP planning horizon.

In general, we agree with the risk assessment. However, we think it would be wise to focus more on the risks related to climate change. Valley Water will be a star if you focus on and address climate change risks as soon as possible. On average imported water will decrease due to decreased snowpack and runoff, and also hopefully because at least 40% of the water will be dedicated to the environment to save iconic California species.

We suggest that analysis be developed and presented to the Board to evaluate if Pacheco Reservoir and the Delta Conveyance actually provide the needed benefits given a forecasted 25% decrease in imported water supplies. It is essential that these projects be constructed only if they are clearly needed, especially since they will result in extensive negative environmental and social impacts.

Furthermore, to **mitigate** the risk of climate change we need to reduce reliance on the Delta as much as possible. That means maximizing conservation, recycling (potable and non-potable) and fixing existing dams as soon as possible, making those projects the top priority. We know those projects will provide water supply benefits. The benefit of projects that rely on imported water is less certain.

Next Steps

The staff report indicates that much of the analysis presented will continue and more information will be provided to the Board in the future. We presume the Board would like to see the final results of the studies as soon as possible. It would be very helpful to have a schedule for these projects so the Board and the public know when the studies will be completed and when they will be presented to a committee or to the full board.

Of particular interest to us, the report says, “Valley Water is evaluating whether diversifying its storage portfolio could help increase Valley Water’s ability to maximize the utilization of its storage under future conditions.” We look forward to hearing more about the results of this evaluation at the Water Storage Exploratory Committee and to the full Board of Directors.

Water Supply Master Plan Considerations

We understand the WSMP has been developed purely from the perspective of Valley Water operations and does not consider the environmental and social impacts of the projects to be implemented under the plan. We think this is unfortunate and will not lead to the best, most holistic public policy. Therefore, we suggest a component of analysis be added that analyzes and summarizes those impacts so they can be considered in decision making.

For example, we think the following environmental and social impacts should be considered:

- How will each WSMP project increase GHG emissions and contribute to climate change? For example, such analysis should include: energy use for construction and operation; construction materials; loss of natural lands for carbon sequestration; and increased emissions from surface reservoir storage (carbon dioxide and methane).
- How will each WSMP project contribute to loss of habitat and species, including negative impacts on the State’s 30x30 conservation goals? For example, such analysis should include: number of species impacted by the project; acres of habitat impacted during

both construction and operation; impact on environmental water quality (temperature, turbidity, etc); and other environmental impacts such as noise, artificial light, and air pollution impacts.

- What positive and negative impacts will each WSMP project have on communities, especially disadvantaged communities? For example, such analysis should include: flood control; impact of water rate increases; and impacts on drinking water quality.

Thank you for considering these comments and we look forward to continuing to work with Valley Water to make sure our water supply is resilient and sustainable, and to reduce the negative impacts of water supply projects as much as possible.

Sincerely,

Katja Irvin, AICP
Conservation Committee
Sierra Club Loma Prieta Chapter

Molly Culton
Conservation Organizer
Sierra Club California