



October 26, 2015

Chair Gary Kremen
And Board Members
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, CA 95118

RE: Item 4.3 Update on Bay Delta Conservation Plan and the Recirculated Draft Environmental Documents

Dear Chair Kremen and Board Members:

Sierra Club California and local Loma Prieta chapter request that the Santa Clara Valley Water District (SCVWD) oppose the proposed California WaterFix (hereafter the Tunnels) project. The SCVWD should fully consider the costs and benefits of the Tunnels in relation to a broad range of innovative alternatives. SCVWD staff reports and communications have treated the project as *fait accompli*. We urge you to drop this approach in favor of an alternative of using ratepayer funds on projects and programs to further increase SCVWD's independence from the Delta through a robust public input and decision-making process.

The Tunnels will paradoxically deplete the Delta of precious water by changing flows, but will not create any new water for users. For \$15 billion, plus whatever cost overruns occur, users of the Tunnels will only have a change in diversion to an area that avoids the inconveniences of properly maintaining the Delta estuary. Once built, operators will likely pressure the State Water Resources Control Board to maximize exports and cause further harm to the Delta, as they have done during this drought.

The San Francisco Bay Delta is the hub of California's water system and the largest estuary on the West Coast of North America. The Delta is also a unique and priceless ecosystem that depends on flows through it. Depriving the Delta of flows through a diversion point on the Sacramento River will destroy the Delta habitat and economy. Fisheries impacts will spread throughout the entire Bay Area. We urge you to reject the Tunnels and instead use ratepayer funds to develop the water infrastructure and management in Santa Clara in a sustainable and innovative manner.

The Tunnels represent a 20th Century model of delivering water that won't work in the climate-change challenged present. Increasing temperatures will dramatically alter flow patterns as a diminished snowpack becomes the new normal. Less water will be available for export as more water must be held to preserve salmon habitat and Delta water quality. Increased reliance on Delta exports that will not be available run contrary to preserving the ecosystem.

The cost of the tunnels have been conservatively placed at \$15 billion. This price tag is likely to be much higher, as interested consultants often aim for the lowest costs defensible and overruns occur. The tunnels are to be paid for by the agencies that benefit from them, meaning the contractors of the State Water Project and Central Valley Project, including SCVWD. It is not clear, however how costs for the project will be apportioned when other agencies cannot or will not pay for the Tunnels. SCVWD is at risk for taking on

more than their share of the project, and cannot distribute costs in an equitable manner. Proposition 218's prohibition on charging more for a service than it costs to provide means that all the ratepayers, regardless of ability to pay, would likely have to pay for the Tunnels, without a guarantee of more reliable water.

Santa Clara County is the world leader in the technology industry. The same spirit of innovation must apply to water management as well. Many modern methods that innovate and diversify water supplies are present in SCVWD's Water Master Plan 2012. Recent developments, however, highlight the need to modify parts of that plan and remove any need for SCVWD to fund the Tunnels.

SCVWD should reinvigorate planning efforts to support conservation, efficiency, recycling, and stormwater capture. Focusing on these efforts will allow SCVWD to leverage ratepayer funds with existing state programs to produce new water, instead of wasting ratepayer funds on destructive Tunnels.

SCVWD can and should continue its progress on water conservation, building a new Californian culture around water use and landscaping. The drought has heightened the public's awareness of the need to conserve, which should be reflected in planning. More can be invested in making efficient appliances affordable and available, especially in multiunit housing and disadvantaged communities. Funding sources have been made available through the Greenhouse Gas Reduction Fund to increase appliance efficiency which should be further encouraged.

Local sources of water can be increased and improved. As the Water Master Plan 2012 noted, recycled water use is increasing. The plan did not, however, prepare for aggressive adoption of water recycling, and did not plan for the advantages that direct potable reuse could provide for SCVWD. With the passage of Proposition 1 in 2014, new sources of funding can be leveraged for this effort.

Assumptions in the Water Master Plan 2012 should also be changed to reflect actual observations in growth. Population projections use the Association of Bay Area Governments 2009 pre-recession estimates, inflating growth, water demand, and the need for continued reliance on unsustainable Delta conveyance.

In updating the plan, SCVWD should seek broad public input in this decision since it will have a long-term impact on the residents of Santa Clara County. This includes surveys, forums, and media outreach similar to that used successfully by SCVWD to pass Proposition B in 2014.

The Sierra Club and Protect our Water appreciates your consideration of these comments and we look forward to continuing to work with SCVWD to find the most cost-effective and sustainable solutions for our future water supply that do not include new plans for destructive Delta conveyance.

Sincerely,



Kyle Jones
Policy Advocate
Sierra Club California



Katja Irvin
Chair, Water Committee
Sierra Club Loma Prieta Chapter