TO

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

Dear Chair Kremen and Members of the Board,

Please consider the following comments regarding the Water Commission Actions and the Water Purification program. There are many items on your June 9 agenda that merit comment from environmental stakeholders. Considering the most important items that require stakeholder input, the Sierra Club Loma Prieta Chapter decided first to give our input to help craft these new ideas and programs that are receiving sudden increased attention.

Our analysis and input on the subject items is included below.

Thank you for your consideration.

Respectfully Submitted,

Water Commission Actions (Item 3.3) and Water Purification Center Budget Adjustments (Item 4.1)

A. The Commission recommends that a clear statement be added to the Ends Policy 2.1, to state that the Board should engage in discussion on the consequence of water supply necessary for long term growth of jobs and population in south bay while addressing sustainability of long term growth and impacts of the drought and partnering with other agencies;

Sierra Club Analysis

- This statement is unclear. A statement along the following lines would be clearer and convey the real emergency we are facing: “... engage in discussion on realistic scenarios for future water supply and the capacity for long-term job and population growth in partnership with other agencies.”
There is a limit to how much population and consumption can be sustained by natural resources, and drinkable water supply may be the resource that first limits our growth here in Santa Clara County, as it has appropriately limited growth in neighboring Santa Cruz and Monterey Counties.

With climate change, drought scenarios and reduced snowpack are more likely. Current import levels are not guaranteed in the future. The impacts of using fossil fuels to purify and pump water also need to be considered.

B. … appropriate rate increases that address the needs for managing the drought as well as *accelerating* the use of recycled water…

Sierra Club Analysis

- We do not understand why rate increases are needed to *accelerate* the use of recycled water. What additional costs will be incurred beyond the costs for a non-accelerated project? The District should actually be saving money on the project by doing no-bid contracts.

- If there are other reasons the project is costing more than accounted for in the previous rate structure, this should be revealed and discussed, but there is no evidence that *accelerating* the project requires a rate increase this year.

- Doing a no-bid contract for CEQA analysis and reducing staff time spent lobbying for a questionable statewide CEQA exemption would also save money in the long run. The Board should demand more information before approving this recommendation.

- These same points call into questions budget adjustments for the water recycling project (Item 4.1), or at least budget vs. funding and therefore the need to increase rates for this project whether accelerated or not. Analysis should include alternative funding prospects such as increased property tax revenues and newly designated Proposition 1 funding.

C. The Commission requests that the Water Retailers and Environmental and Water Resources Committee attend the Water Commission’s July meeting to present their issues and recommendations of the policies on water’s impact on people, creeks, fish and ecosystems during this drought.

Sierra Club Analysis

- This statement is also unclear. A statement along the following lines would be clearer and keep the conversation focused on the recently renewed topic of fish habitat restoration: “… issues and recommendations related to policies on the impacts on creeks, fish and ecosystems during this drought.”