

Sent via Electronic mail to WSIPComment@cwcc.ca.gov

October 19, 2021

Honorable Members of the California Water Commission
P.O. Box 942836
Sacramento, CA 94236

RE: Water Storage Investment Program, Pacheco expansion

Dear Commissioners:

We write out of concern about the proposed expansion of Pacheco Reservoir (PRE) under consideration by the CWC for funding through WSIP. With continuing climate change, other changed circumstances, and new information, the selection of this alternative to the San Luis Low Point Improvement Project (SLLPIP) appears unreasonable.

The SLLPIP was proposed to improve water quality in San Luis Reservoir (SLR), which suffers from algal bloom, especially during low water events. The Bureau of Reclamation released an environmental study looking at several options—among them: raising the height of the dam at San Luis, building lower intake pipes, changing the way the district (Santa Clara Valley Water District/District/SCVWD/Valley Water) filters and treats its water, and building the new Pacheco Reservoir.

Several problems, outlined below in summary fashion, indicate that the PRE would not be an advisable option for addressing the SLLPIP.

Cost: Total project cost has risen to \$2.5 billion, far above the initial estimates, and could rise more. <https://www.mercurynews.com/2021/01/12/2-5-billion-pacheco-dam-project-moves-forward-despite-cost-increase/> This likely renders the project less than cost effective. (The CWC staff had previously found: “The maximum eligibility amount for this project is \$484.55 million and the project’s total capital cost is \$969.10 million.”

No net water quality or habitat improvement:

- **HABs:** Diversion of water from SLR for the Pacheco Reservoir Expansion (PRE) had been determined not likely to affect water quality in SLR because of San Luis’ “regular refill during fall and winter”.

https://www.usbr.gov/mp/nepa/includes/documentShow.php?Doc_ID=39561

However, San Luis Reservoir is currently at 12% capacity (25% of average as of October 3, 2021). And climate change has been recognized as including “increased average temperatures, more extreme hot days, fewer cold nights, ... shifts in the water cycle with less winter precipitation falling as snow, and both snowmelt and rainwater running off sooner in the year (California Natural Resources Agency 2009)”.

https://www.parks.ca.gov/pages/21299/files/sanluisrmp-gp_feis-feir_chap_2.pdf The past

water year clearly showed that increased temperatures combined with less rainfall and dry ground mean less runoff occurs to surface reservoirs. With uncertain snowmelt and less water to refill reservoirs, the 140,000+ acre-feet that Pacheco would drain from SLR could have a significant negative impact on HABs in SLR. Average summertime temperature highs at San Luis Dam in 2012 ranged from 86+ degrees F to 91+ degrees. Inexorably, those numbers will increase with climate change.

- **Harm from SCVWD's diversion of CVP water:** According to Bureau of Reclamation's 2019 DEIS/EIR, "SCVWD would be able to fully divert its CVP allocation" earlier in the year to avoid interrupted delivery of CVP deliveries from San Luis Reservoir in low point years." SCVWD could therefore take more water from SLR, leaving SLR more susceptible to algal blooms and other identified low-point problems, exacerbating those problems. As we have seen this year, the early diversion of water to agriculture in California's south has not left enough for cities and other uses.

- **Local creeks not primary water source for PRE:** "The primary water sources to fill the expanded reservoir would be natural inflows from the North and East Forks of Pacheco Creek." <https://cwc.ca.gov/-/media/CWC-Website/Files/Documents/2018/WSIP/DeterminationsPacheco.pdf> CVP water (SCVWD's and SBCWD's) was to be a supplemental source from San Luis Reservoir. (See above URL.) But, those creeks, inland in a dry landscape, also suffer from the same drought that affects all watersheds in the area. Further, SCVWD Director Gary Kremen commented in an open Board meeting that he didn't know what they would fill Pacheco with if they didn't have the Delta tunnel(s).

- **Adverse effect on Pacheco Creek:** It was determined previously that PRE "would not adversely affect beneficial use of Pacheco Creek" and that it would "provide Ecosystem Improvement to Steelhead habitat" (monetized public benefits determined by SCVWD). But, according to a study published in the journal PLOS ONE by the University of California, Davis, "Dams poorly mimic the temperature patterns California streams require to support the state's native salmon and trout — more than three-quarters of which risk extinction." <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0256286> The purported benefits of PRE on Pacheco Creek stream habitat should be reevaluated in view of this UCD study. It appears unlikely that proposed project will advance the long-term objectives of restoring ecological health.

Floods: A new Pacheco Dam was touted in 2020 as a flood mitigation measure (non-monetized flood control benefit), yet few parcels in Santa Clara County are subject to flooding from Pacheco Creek, which drains to the Pajaro River and Monterey Bay. Instead of installing a new \$2 billion-plus dam on Pacheco Creek, land in the Soap Lake Basin, which straddles Santa Clara and San Benito County boundary, could— like the 937 acres recently acquired that provide flood protection in Coyote Valley— be used to contain flood waters.

Thank you for considering these points. The Pacheco Reservoir Expansion project makes less and less sense as details of the likely costs and dwindling benefits accrue. We attach to this email our 3/12/2021 comment letter sent to Valley Water regarding its Environmental Impact Report for the Pacheco Reservoir Expansion Project. We would be pleased to be notified of further opportunities to comment on this proposed reservoir expansion.

Respectfully submitted,

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