



December 8, 2021

California Water Commission  
P.O. Box 942836  
Sacramento, CA 94236

*Submitted electronically to: [WSIPComment@cw.com](mailto:WSIPComment@cw.com)*

**Re: Pacheco Reservoir Expansion Project Continuing Eligibility and Feasibility  
Determination, December 15, 2021 Commission Meeting**

Dear California Water Commission:

Thank you for the opportunity to comment on the Water Commission's consideration of the eligibility and feasibility of the Pacheco Reservoir Expansion Project. The following comments are submitted on behalf of the California Native Plant Society ("CNPS"), a non-profit environmental organization with more than 11,000 members in 35 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plant heritage and preserve it for future generations through the application of science, research, education, and conservation. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

CNPS is interested in the Pacheco Reservoir expansion because of its potential significant and harmful impacts to native plant species and habitats. In reviewing the details of the project, we do not believe that the criteria for making a finding of eligibility and feasibility have been met. As a result, the Water Commission should not issue a determination that the project is eligible for Water Storage Investment Program (WSIP) funding.

The information currently available about this project does not demonstrate that the project is economically or environmentally feasible. The project as proposed is high-risk and high-cost, and its purported benefits do not outweigh its costs. In fact, the information available does not even accurately disclose the true costs and benefits of the project. Valley Water District's supplemental feasibility documentation materials from November 2021 do not follow established standards, do not justify purported ecosystem benefits, and exaggerate the project's water supply benefits, among other issues. The Draft Environmental Impact Report that was made available on November 18, 2021, also fails to fully disclose and properly mitigate the significant environmental impacts of the project, which we will elaborate on in comments to Valley Water during the DEIR public comment period.

In summary, the information that was recently made available about the project shows that it does not meet the requirements for WSIP funding and there is insufficient evidence to show that the project is environmentally or economically feasible. The Water Commission thus does not have the necessary basis for making a feasibility determination and should not allow the project to proceed.

Lastly, we are concerned that by permanently destroying intact habitats, projects such as the Pacheco Reservoir may impede the state's ability to meet its conservation goals. In recent years, the state has embarked on ambitious endeavors such as the 30x30 effort (AB3030) and Governor Newsom's Executive Order N-82-20. These efforts highlight the importance of conserving California's remaining, intact habitats. We strongly encourage the Water Commission and Valley Water to pursue options to procure water, or ensure the availability of water via conservation strategies, that do not result in the destruction of habitat.

Thank you for your consideration of these comments.

Sincerely,

*/s/ Isabella Langone*

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