

October 30, 2015

BDCP/California WaterFix Comments  
P.O. Box 1919  
Sacramento, CA 95812  
Email: [BDCPComments@icfi.com](mailto:BDCPComments@icfi.com)

**Subject:** Comments on Bay Delta Conservation Plan/California WaterFix Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement

The Santa Clara Valley Water District (District) appreciates the opportunity to comment on the Bay Delta Conservation Plan (BDCP)/California WaterFix Partially Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS). The RDEIR/SDEIS represents a nine year, bipartisan effort by a diverse group of stakeholders, public water agencies, and State and federal agencies to develop a workable long-term solution to restore the health of the Delta ecosystem and water supply reliability.

However, the California WaterFix is only one part of the State's overall Water Action Plan. The State's Water Action Plan aims to meet three broad objectives: "more reliable water supplies, the restoration of important species and habitat, and a more resilient, sustainably managed water resources system (water supply, water quality, flood protection, and environment) that can better withstand inevitable and unforeseen pressures in the coming decades." The District supports all three of these objectives and urges the State to not lose momentum on implementing a comprehensive approach to address multiple stressors and restoration opportunities. The District supports accelerating habitat restoration through the California EcoRestore program, and also encourages the State to continue efforts to address all the stressors identified in Conservation Measures 2-21 of the BDCP.

Water supply reliability and environmental stewardship are both part of the District's mission as the primary water resource agency for Santa Clara County. The District supplies wholesale water, provides flood protection, and serves as environmental steward for clean, safe creeks and healthy ecosystems for the County's 1.9 million residents and the vital high-tech economy known as "Silicon Valley."

The District was formed in 1929 to address groundwater overdraft and land subsidence in San Jose and adjacent cities, serious conditions that were successfully resolved by the importation of water from the federal Central Valley Project ("CVP") and State Water Project ("SWP"). Today, an average of 40% of Santa Clara County's water supplies are conveyed through the Delta by these projects. The District adopted a Water Master Plan to achieve long-term water supply reliability in Santa Clara County through 2035. Through implementation of the strategies identified in the Water Master Plan, future growth in water demand in Santa Clara County is

anticipated to be met with increased water recycling and water conservation; however the county will still be dependent on long-term average Delta-conveyed supplies to meet approximately 30 percent of its water needs.

The District remains concerned with continuing to rely on existing conditions of through-Delta conveyance for the District's imported water supplies because of the instability of existing Delta levees, underlying seismic risks, climate change, ongoing regulatory uncertainty, and the Delta's environmental health. To address these concerns, the District has been supporting efforts to achieve the coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem, in balance with the unique and evolving cultural, recreational, natural resource, and agricultural values of the Delta.

The District's desired outcome is a cost-effective, comprehensive, and reliable long-term solution for the Delta that meets the water supply, water supply reliability and water quality needs of Santa Clara County while balancing other beneficial uses and providing a sustainable Delta ecosystem. It is within this context that the District has reviewed the RDEIR/SDEIS.

The fundamental purpose of the new preferred alternative presented in the RDEIR/SDEIS, specifically the California WaterFix, is "to make physical and operational improvements to the SWP/CVP system in the Delta necessary to restore and protect ecosystem health, water supplies of the SWP and CVP south of the Delta, and water quality within a stable regulatory framework, consistent with statutory and contractual obligations." This purpose is consistent with the District's desired outcome. Based on the analysis presented in the RDEIR/SDEIS, the California WaterFix has the potential to achieve this purpose. While the California WaterFix does not go as far to restore and protect ecosystem health as the originally proposed BDCP, the analysis indicates that the project would improve flow patterns and reduce entrainment of fish species of concern. In addition, the increased operational flexibility afforded by the new intakes could improve management of the project to avoid diversions at times and locations that harm fish species of concern.

In addition to these environmental benefits, the analysis in the RDEIR/SDEIS suggests that the California WaterFix would significantly stabilize and protect both the quantity and quality of imported water supplies for Santa Clara County by: (1) reducing regulatory risk and improving long-term average water supply reliability (or avoiding loss of long-term average water supply); (2) reducing risk of a prolonged imported water supply interruption due to seismic events and climate change; and (3) improving quality of imported water conveyed through the Delta.

With respect to the District's goal of balancing other beneficial uses, the District commends the State for revisions to the project that lessen the project's impacts on Delta communities. The California Department of Water Resources (DWR) has, in response to public input, revised the preferred alternative to substantially reduce the adverse effects of the project on Delta residents and the Delta environment. The latest design modifications provide for gravity flow of water through the tunnels and include consolidation of previously proposed pumping plants at the tunnel intakes into a single facility at Clifton Court Forebay; these changes reduce visual impacts, facility footprint size, and power needs.

As the District previously stated in its comment letter on the 2013 Draft EIR/EIS for the BDCP, the environmental review document needs to include an assessment of water supply and water quality impacts associated with draw down of the San Luis Reservoir and appropriate measures



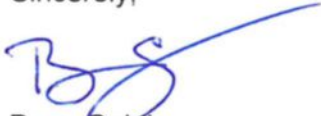
October 30, 2015

to address those impacts. The analysis should consider the real-time operational adjustments that are likely to occur. The District understands that DWR will be responding to all comments on the 2013 Draft EIR/EIS (as well as comments it receives on the RDEIR/SDEIS during this public review process) in the final EIR/EIS and that DWR will be updating its analysis on the issue based on more recent modeling results. Please contact District staff if DWR has questions relating to this issue or if there is any information that the District can provide to assist DWR with completing the updated analysis related to San Luis Reservoir operations.

The District's desired outcome is also a cost-effective solution with costs allocated equitably. In order for the District to support the project, it must make economic sense to Santa Clara County. While the costs and cost allocations among beneficiaries are still being determined, the project must provide for sufficient water supplies, water supply reliability and water quality improvements to justify the substantial financial investment. In addition, there is still significant scientific uncertainty associated with the benefits of many of the operational criteria that constrain export supplies in the proposed project. The District encourages DWR, the U.S. Bureau of Reclamation and the fish and wildlife agencies to commit sufficient staff and financial resources to support a robust collaborative science and adaptive management program which would identify management actions and operational criteria that maximize water supplies while minimizing impacts and avoiding jeopardy to listed fish species.

The District appreciates the lead agencies' consideration of our RDEIR/SDEIS comments. If there are any questions regarding the comments, please contact Ms. Cindy Kao at (408) 630-2346, or [ckao@valleywater.org](mailto:ckao@valleywater.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Beau Goldie', with a long, sweeping horizontal stroke extending to the right.

Beau Goldie  
Chief Executive Officer