

## Max Overland

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**Subject:** Comments Valley Water 7/9/23 Board Meeting

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**From:** [jim.kuhl@comcast.net](mailto:jim.kuhl@comcast.net) <[jim.kuhl@comcast.net](mailto:jim.kuhl@comcast.net)>

**Sent:** Monday, July 8, 2024 3:29 PM

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**To:** Valley Water (VW) Board of Directors

**Date:** Tuesday, July 09, 2024

**Agenda Item:** 6.1

**Subject:** Set Potable Reuse Goal to 24,000 AF/Y by 2035 and Water *Affordability* Report

### Comments:

1. The 2035 wastewater recycling to potable water goal be increased to the current maximum potential available (i.e., 44,000 AF/y) for the Pure Water Project.
2. Valley Water Board request that the expert report(s) on the Palo Alto Wastewater Recycling to Potable Water (i.e., Pure Water) Project containing scope, analysis, references and cost estimates be published for public review.
3. When will Valley Water's commissioned expert report on water *affordability* be available for public review?

### Comments Background

#### Potable Water Reuse Goal

The duration and depth of droughts given climate change is unknown making continued significant (~40%) dependance on importing drought susceptible Delta water very risky as a long-term planning strategy for supplying water. Valley Water already recognizes alternative water supplies to imported Delta water need to be implemented to reduce this risk. Wastewater recycling to potable water is the lowest operating cost option alternative to imported Delta water stored in reservoirs and groundwater banks. The actual wastewater potential for recycling to potable water is 44,000AF/Y according to Valley Water staff. For long-term planning, Valley Water goals should be more outreach and backed down only when unsurmountable technical or economic problems are encountered. The 24,000AF/Y by 2035 is too conservative a goal and will be self-for filling leaving significant untapped potential. **Because of the recycling project's long implementation timeline, the 2035 goal should be increased to 44,000AF/Y to maximize the potential supply and the project scoped accordingly in the 2050 Water Supply Master Plan.**

**Publish Palo Alto Wastewater Recycling to Potable Water Expert Report(s)**

07/09/2024

Significant concerns exist concerning the veracity of the numbers being used by Valley Water Board and Staff to make investment decisions involving the wastewater recycling to potable water project and tradeoffs between other water supply projects. Compared to 'Best-In Class' Orange County's wastewater recycling facility, the Palo Alto wastewater recycling project's estimates are extremely high in operating cost and extremely high in infrastructure capital requirements for the very low output capacity being provided. Darn Taylor identified the problem as being one of 'economy-of-scale' in a report to Director Eisenberg but without providing supporting analysis justification. Numerous scoping and cost estimate questions exists. The project's 20-mile pipeline has been identified as the source of half its capital requirement. Rather than direct use, the pipeline transports the project's recycled potable water to settling ponds where significant evaporation will occur. Valley Water staff has been unable to locate the expert Palo Alto wastewater recycling to potable water report(s) and make it available for public review. **The project's scope and cost estimated need to be reexamined, compared to benchmarks. etc. enabling independent 'due-diligence' checks.**

#### **Water Affordability in the 2034 through 2060 time frame**

Independent roughcut analysis indicates that if all Valley Waters' planned infrastructure and other (e.g., water conservation) supporting water supply projects are implemented, San Jose Water Company's retail water bills will increase  $\approx 136\%$  in North County. If valid, this significant increase raises concerns on water *affordability* and the adverse impact this will have. Already the very high cost-of-living is causing population decline in South Bay Area and the long-term adverse economic consequences this implies. **When will the Valley Water commissioned expert study be available for public review?**

Best regards,

A handwritten signature in blue ink that reads "Jim".

Jim Kuhl, Civic Issue Activist and Environmental Advocate