

This item was received after the 6/17/22 WSEC so it's being distributed to the full Board.



June 17, 2022
Santa Clara Valley Water District
5750 Almaden Expressway
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Via email to the Water Storage Exploratory Committee:

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**Re: Valley Water June 17, 2022 Water Storage Exploratory Committee Meeting
Item 4.1 Sites Reservoir Project: Letter to Request Opportunity to Increase Valley
Water's Participation Level**

Dear Board Members,

At the March 22 board meeting, the Valley Water Board of Directors voted on an agreement for a participation level of 0.2 percent of the total project and a funding commitment of \$200,000 covering calendar years 2022 through 2024 for the Sites Reservoir project. This phase includes planning, an EIR, and permitting and will cost at least \$143 million. This low investment and skepticism on behalf of Valley Water makes sense because Sites Reservoir is likely an expensive waste of funds, will harm the environment, and will not provide a new source of water.

Please consider the following comments which we hope will provide a useful external perspective on why Valley Water should stop supporting the Sites Reservoir project and remove this project from their water storage investment portfolio.

Environmental Impacts

Sites Reservoir would divert additional water from the Sacramento River, which is a main tributary to the Delta. The Bay-Delta watershed is experiencing an ecological crisis and cannot support additional diversions. As proposed, the project operations would not provide sufficient minimum flows to actually meet species needs. Save California Salmon says that up to 98% of the Sacramento River winter run salmon died this summer due to climate-related drought and over-allocation of water to industrial farmers. Moreover, the forthcoming Delta Plan update will likely change how the project can be operated in order to comply with new water quality standards.

Significant diversions from the Sacramento River to fill Sites Reservoir could result in substantial impacts to the river's ecosystem including reduced volume of water and water quality due to the inability to flush out runoff, Ag waste and municipal waste, increased temperatures, salinity, and harmful algal blooms (HABs). These affect sensitive riparian and aquatic habitats. Sites would inundate 13,200 acres of grassland, woodland, chaparral, riparian habitat, vernal pools and wetlands (including 19 acres of rare alkali wetlands). 23 endangered or threatened species would be at risk and 56 other endangered species have the potential to be impacted. There are 4 plant species that the California Native Plant Society deems of "rare distribution" in the affected site.

Cost

The proponents now estimate that Sites Reservoir will cost \$3.9 billion to construct, a 30% increase from prior estimates. As a result, water from Sites is likely to cost more than \$900-1400 per acre foot on average. The Delta tunnel will cost \$16-40 billion on top of the Sites costs. In an era of climate change, where it was just predicted that [the Sierra Nevada will not have snow in 25 years](#), **Sites Reservoir will likely never be completely full and will eventually become a deadpool, or a stranded asset.**

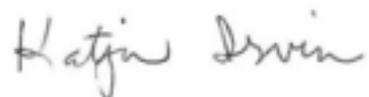
California already has constructed nearly 1,400 dams and reservoirs, and compared to the excessive and unsustainable demand for water in our state, new dams and reservoirs provide little water at high cost. Most dams and reservoirs have had devastating impacts on our native fish and wildlife, and the Tribes, fishing jobs, and communities that depend on their health. Field studies show that there are 41 prehistoric Tribal sites in the area of impact of the proposed Sites Reservoir, 17 of which meet the criteria to be placed on the National Register of Historic Places.

Sites Reservoir currently does not propose to divert water only during really wet years and extremely wet periods, but instead plans to divert water in most years, including an average of nearly 100,000 acre feet of dry and critically dry years.

Additionally, at the March 22 Valley Water board meeting where funding for Sites was approved, Director Kremen made this comment regarding Sites: "all that is out there is cows... I find that this is not any 'pristine wilderness', if it was I would look at it differently." [Sierra Club California went on a tour of the proposed location for the Sites Reservoir project in February](#), and while we saw some cows, we also saw federally protected golden eagles and bald eagles. Pristine wilderness is not the only type of natural area worthy of conservation. The Sites reservoir footprint has the potential to contain vernal pools, alkali wetlands, and other rare wetland habitat that was not adequately described in the environmental review. While it's unclear what Director Kremen defines as "pristine wilderness", rare habitats and the wildlife they support should be protected and conserved.

Thank you for considering these comments and we look forward to continuing to work with Valley Water to make sure our water supply is resilient and sustainable, and to reduce the negative impacts of water supply projects as much as possible.

Sincerely,



Katja Irvin, AICP
Conservation Committee
Sierra Club Loma Prieta Chapter



Molly Culton
Conservation Organizer
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Jann Dorman
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Steve Evans
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