



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

June 9, 2025

To: Valley Water Board of Directors

Sent via email to: clerkoftheboard@valleywater.org, board@valleywater.org

Re: June 10, 2025 Board Meeting, Item 3.4. Receive Information and Provide Feedback on Valley Water's Draft Water Supply Master Plan 2050

The Sierra Club Loma Prieta Chapter will provide comments to staff on the Draft Water Supply Master Plan 2050 (Plan), but there are a few items we want to bring to the Board's attention regarding the staff report for this agenda item. In general, we want to see more transparency in this plan with detailed explanation of how modeling and other information was used to formulate the Plan, and how staff analysis led to the conclusions in the Plan.

Here are our specific comments related to the staff report and PowerPoint presentation.

1. Under Planning Approach on page 2 of the staff report, it says "The imported water baseline supply scenarios were selected from Department of Water Resources (DWR) modeling. The **modeling assumes existing regulatory conditions** and State Water Project (SWP) and Central Valley Project (CVP) infrastructure and takes into account climate change impacts." **The Bay-Delta Water Quality Control Plan is currently a big regulatory wild card.** The Bay-Delta Plan is scheduled to be enacted this year or next year and will impact imported water supply positively or negatively. This should be discussed in the Water Supply Master Plan and should be included as part of adaptive management.
2. Under Water Supply Strategy on page 3 of the staff report, it says "Based on the project evaluation and discussions with both internal and external experts, one representative portfolio for each strategy was selected ..." **It is not clear why the representative portfolios were selected. The Plan should explain how project evaluation and discussions with the experts resulted in selection of these portfolios.** In general, the Plan should describe the input from the expert panel, especially any input that changed the outcome of staff analysis.
3. Under Water Supply Strategy on page 4 of the staff report regarding the Lower Cost strategy it says "all major projects require partnership and institutional agreements to be successful." This is not unique to the Lower Cost strategy. **All the proposed projects require partnerships and institutional agreements.**
4. On PowerPoint slide 4, Planning Goals for "Reduced shortage risk" and "Supply diversification" may be at odds with "Affordable rates" because so many high-cost projects are included to meet the first two goals. **The Plan should discuss how affordability is evaluated (benchmarking, etc.) and how the Rate Impact of Water Supply Strategies (slide 19) will impact affordability.** Adaptive management should also include affordability indicators.

5. PowerPoint slide 16 Portfolio Analysis of shortage reduction says **“Pacheco is shown with partners” but it is unclear why with partners was modeled instead of without partners**, especially since Pacheco without partners appears to be the most likely outcome. At least, the Plan should explain how shortage reduction would be different without partners. The Plan should also **explain Interaction Benefit and explain exactly how projects complement each other and make the whole system much more efficient.**
6. PowerPoint slide 23 Annual Reporting for Adaptive Process should include indicators related to affordability since Affordable rates is one of the goals of Plan. **At least the plan should explain how affordability is considered as part of adaptive management.** Also, once the Bay-Delta Plan is adopted, the next Monitoring and Assessment Program report should **evaluate the impacts of the Bay-Delta Plan on “annual supply” and adjust portfolios accordingly.**

We appreciate staff’s effort and outreach regarding the Water Supply Master Plan 2050 and the opportunity to provide comments on draft Plan. Hopefully our comments and other comments will be taken into consideration to improve the Plan even further.

Thank you for your consideration of these comments.

Sincerely,

Katja Irvin, AICP
Guadalupe Group Conservation Chair
Sierra Club Loma Prieta Chapter