

**DOCKETED**

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| <b>Docket Number:</b>   | 25-SPPE-02                                                                                                                 |
| <b>Project Title:</b>   | NorthTown Backup Generating Facility (NTBGF)                                                                               |
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| <b>Document Title:</b>  | Lisa Brancatelli Comments - Valley Water's comments on the NOP of a draft EIR for the NorthTown Backup Generating Facility |
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| <b>Organization:</b>    | Lisa Brancatelli                                                                                                           |
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*Comment Received From: Lisa Brancatelli*

*Submitted On: 8/20/2026*

*Docket Number: 25-SPPE-02*

## **Valley Water's comments on the NOP of a draft EIR for the NorthTown Backup Generating Facility**

Valley Water has reviewed the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for the proposed NorthTown Backup Generating Facility at 350 West Trimble Road Project, received by Valley Water on August 10, 2026.

The proposed development is located adjacent to Valley Water fee title property, which includes the Guadalupe River and the Guadalupe River Trail. Any work proposed to occur on Valley Water's right-of-way will require the issuance of a Valley Water permit as per Valley Water's Water Resources Protection Ordinance, and requires Valley Water to be considered a responsible agency under CEQA.

Valley Water has the following comments regarding the NOP:

1. According to the Federal Emergency Management Agency's current Flood Insurance Rate Map No. 06085C0068J, dated February 19, 2014, a significant portion of the site is located in Special Flood Hazard Zone AH, which has a base flood elevation of 27 feet and is subject to flooding from a 1% annual chance flood. The remaining portion of the site is in Zone X, an area with a 0.2% annual chance of flooding.

The NOP does not mention the assessment of impacts on hydrology and water quality; however, the DEIR needs to include a thorough analysis of potential flooding impacts resulting from the proposed improvements and clearly state that Zone AH is designated as a Special Flood Hazard Area (SFHA) by FEMA. Any development within a SFHA must comply with building standards set by the City and FEMA, which include flood-proofing requirements.

2. The DEIR should clarify if water supply is needed for the proposed project. If so, the DEIR should provide an estimated total water demand during construction and an ongoing annual water demand, including any potential dewatering or fire-flow requirements. Additionally, the DEIR should clarify whether the proposed water supply will come from private on-site wells or a designated water retailer. These water demand estimates help support Valley Water's management of water supply and sustainable groundwater resources in Santa Clara County.

3. The NOP does not reference assessing the impacts to utilities in the DEIR, however due to the size of the project, a Water Supply Assessment (WSA) is likely required to be prepared and incorporated into the DEIR to evaluate potential impacts to future water supply. To ensure the most recent data is used, the WSA should be based on the utility provider's 2025 Urban Water Management Plan, if available.

4. The proposed project overlies an area of shallow groundwater. According to Valley

Waterâ€™s Historical Groundwater Elevation Data web tool

(<https://gis.valleywater.org/Wells.html>), depths to groundwater in the area range from approximately 5 to 20 feet below the ground surface. Groundwater depths fluctuate seasonally and annually, but have been relatively high in recent years due to wet winters. Please consider the following for the protection of shallow groundwater quality:

a. Any proposed earthwork should be evaluated and monitored to ensure that construction activities do not adversely impact shallow groundwater quality or the water quality of the Guadalupe River.

b. The NOP states that approximately 234,000 gallons of diesel fuel will be stored in integrated fuel storage tanks within each generator enclosure, and up to 4,200 gallons of urea or diesel exhaust fluid will be stored in 100-gallon tanks within each generator enclosure. Appropriate emergency response plans should be developed in the event of a fuel/solvent storage device/tank or a generator fuel leak to protect groundwater quality from contaminants that could infiltrate groundwater or be released to the nearby Guadalupe River. Secondary containment devices and leak detection devices are recommended in the event of a leak or spill to enable a timely cleanup response.

c. Any proposed stormwater management infrastructure (i.e., direct or indirect infiltration devices, stormwater chambers, bioretention/biotreatment areas, self-retaining landscape planters, and flow-through planters, etc.) implemented at the site should be designed to minimize groundwater quality degradation due to infiltrating stormwater. These features should maintain adequate vertical separation from seasonally high groundwater and should comply with all applicable sections of the Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Stormwater Handbook.

d. The applicant needs to ensure that runoff from activities and development at the site (APNs 101-02-018 and 101-02-021) does not adversely impact the surface water quality of the adjacent Guadalupe River, which recharges the shallow groundwater in the area.

e. If an on-site wastewater treatment system or septic system is selected, the design and construction should satisfy all Santa Clara County Department of Environmental Healthâ€™s horizontal setback and vertical groundwater separation requirements.

f. The proposed project area has a history of agricultural use and related contamination. A previous Phase I Environmental Site Assessment (ESA) conducted in 2024 identified a history of hazardous materials use and spills at adjacent industrial sites. Additionally, a prior Phase II ESA conducted in 2014 detected heavy metals, specifically arsenic, in the soil and groundwater at the site. The site has been designated as a former contamination site (T0608598475) and is located near or downgradient from known groundwater cleanup sites, which can be accessed via the State Water Resources Control Boardâ€™s GeoTracker webpage (<https://geotracker.waterboards.ca.gov/>). Several former and active contamination sites are located within 1,500 feet of the proposed site, including active sites T10000024765, T10000007374, and T10000008962, as well as former sites T0608500459 and T0608501510.

To minimize potential risks, any construction and development activities should limit disturbance to soil and groundwater to prevent the remobilization of contaminants and to avoid infiltration into groundwater or runoff into the nearby Guadalupe River.

g. The applicant should ensure that site operations during and after construction (e.g., excavation, dewatering, stormwater management) do not disturb and/or re-mobilize any former onsite contamination and/or interfere with any active environmental cleanup projects in the surrounding area.

5. The DEIR should also note that the project site is subject to dam inundation from the James J. Lenihan Dam on Lexington Reservoir, the Coyote Dam, the Calero Dam, and the Leroy Anderson Dam on Anderson Reservoir.

6. Valley Water records identify at least seven (7) destroyed wells at the site (APNs: 101-02-018 and 101-02-021), which can be viewed on Valley Water's Well Information webpage (<https://gis.valleywater.org/Wells.html>). Additionally, there are five (5) pending wells proposed at the site (Well Pending55553; Well Pending55554; Well Pending55555; Well Pending55556; Well Pending55548). Any wells in use that may be impacted by project activities must be protected. To avoid impacts on groundwater quality, any wells found on-site that are not intended for use must be properly destroyed in accordance with Ordinance 90-1, which requires the issuance of a well destruction permit or registration with Valley Water, and ensures protection during construction. Furthermore, any newly proposed active wells located on-site must also be protected during and after construction. For more details, please contact Valley Water's Well Permitting and Inspection Hotline at (408) 630-2660, or visit: <https://www.valleywater.org/contractors/doing-businesses-with-the-district/wells-well-owners>.

We appreciate the opportunity to comment on the NOP and would also appreciate the opportunity to review the DEIR document when it becomes available. If you have any questions, or need further information, you can reach me at (408) 630-2479, or by e-mail at [LBrancatelli@valleywater.org](mailto:LBrancatelli@valleywater.org). Please reference Valley Water File No. 20430 on future correspondence regarding this project.