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Valley Water File 34935 - NOA of DEIR for Lafayette Backup Generating Facility Project

The Santa Clara Valley Water District (Valley Water) has reviewed the Draft Environmental Impact Report (DEIR) for the Lafayette Backup Generating Facility located at 2825 Lafayette Street in Santa Clara, received on April 7, 2023.

Based on our review, we have the following comments:

1. The discussion on inundation zones on page 4.10-7 notes the site is within the inundation area of 2 reservoirs but only identifies Lexington reservoir. The document should note the site is not only within the Lenihan Dam inundation zone but also the Leroy Anderson Dam Inundation Zone.
2. Page 4.10-2 notes the site is located in Flood Zone AH with depths of flooding of one to three feet. However, according to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) 06085C0227H, effective May 18, 2009, only a portion of the project site is located in Zone AH, a special flood hazard area (SFHA) with a base flood elevation of 40 feet, and the remaining portion of the site is located in Zone X, an area with reduced flood risk due to a levee. Page 10.10-7 also incorrectly notes the flooding expected would be one to three feet instead of identifying the base flood elevation of 40 feet identified on the FIRM panel. The discussion of flooding on both pages needs to be updated for accuracy. Additionally, the flood discussion on Page 4.10-7 notes though the site is located near the Guadalupe River and San Tomas Creek "these waterways do not pose a likely flood risk." This statement appears to contradict the fact that at least a portion of the site is located within a SFHA with flooding from the Guadalupe River. Please revise the flood discussion for accuracy.
3. Valley Water records indicate that 2 active wells are located within the project site; one on each APN: 224-04-093 and 224-04-094. If the wells will continue to be used following the permitted activity, they need to be protected so that it does not become lost or damaged during completion of permitted activity. If the wells will not be used following permitted activity, they must be properly destroyed under permit from Valley Water, in accordance with Valley Water Ordinance 90-1. While Valley Water has records for most wells located in the County, it is always possible that a well exists that is not in Valley Water's records. If previously unknown wells are found on the subject property during development, they must be properly destroyed under permit from Valley Water or registered with Valley Water and protected from damage.
4. Valley Water does not have any right of way or facilities at the project site; therefore, in accordance with Valley Water's Water Resources Protection Ordinance, a Valley Water encroachment permit is not required for the work.

Please let me know if you have any questions regarding the comments. This has been

assigned to Valley Water File 34935. Please reference this number on future correspondence regarding this project.

Thank you,
Matthew Sasaki