From: Matthew Sasaki <MSasaki@valleywater.org>
Sent: Monday, August 25, 2025 4:41 PM
To: Power Santa Clara Valley
Cc: Colleen Haggerty
Subject: Valley Water File 34968 - LS Power Grid California Power Santa Clara Valley Project DEIR

Follow Up Flag: Flag for follow up
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Hi,

The Santa Clara Valley Water District (Valley Water) has reviewed the Draft Environmental Impact Report (DEIR) for LS Power Grid California's Power the Santa Clara Valley project, received on July 11, 2025.

Based on our review, we have the following comments:

1. The proposed project improvements cross over or are located on Valley Water's easement, fee title property, and/or facilities. In accordance with Valley Water's Water Resources Protection Ordinance, a Valley Water encroachment permit will be required for the project and Valley Water is to be considered a Responsible Agency under CEQA. LS Power Grid California is currently working with Valley Water to secure these permits.
2. Proposed crossings of creeks need to follow Valley Water's Guidelines and Standards for Land Use Near Streams at a minimum where they are in Valley Water's right of way.
3. Page 2-32: The Skyline HVDC is proposed on parcels with APNs 259-23-020 and 259-23-024. Valley Water holds an easement on the parcel with APN 259-23-024. This should be noted in Section 2.7.2 under Existing Rights-of-Way or Easements. Encroachments onto the easement will require a Valley Water encroachment permit. The transmission lines proposed between the Grove HVDC Terminal and the PG&E Metcalf Substation may encroach onto Valley Water's fee title property. If use of Valley Water property and land rights on Valley Water's property is needed, it needs to be specified in this Section 2.7.2.
4. Page 2-45: Vegetation clearing or tree trimming and removal around the Metcalf to Grove Transmission Line is proposed. Any proposed vegetation clearing on Valley Water's right of way will require Valley Water approval in the form of a Valley Water encroachment permit.
5. Pages 2-55 to 2-60, Section 2.8.5.4: The project proposes to cross over Valley Water's Snell Pipeline via horizontal bore. information on protection and mitigation measures to reduce impacts on the Snell Pipeline, such as an insulation blanket, need to be provided including impacts related to installation of the mitigation measures.
6. LS Power Grid California has previously communicated to Valley Water that high-voltage DC monopolar earth return cables will be used where there transmission line crosses Valley Water's Snell Pipeline. This needs to be confirmed and additional information needs to be provided regarding the proposed corrosion protection system.
7. Pages 2-64 and 3.10-24 to 3.10-26: Runoff from the proposed Skyline site needs to be collected into the City of San Jose's storm drain system. Runoff shall not flow onto Valley Water's easement for the Guadalupe River to the west.
8. On several occasions, the draft EIR states that take coverage for tricolored blackbird individuals would be obtained through coverage under the Santa Clara Valley Habitat Plan (VHP). The VHP's

take coverage for tricolored blackbird is limited to non-breeding habitat; the VHP does not provide take coverage for tricolored blackbird individuals or colonies.

9. The western bumble bee has been identified throughout this draft EIR as having a "moderate potential to occur" within the study area. Range maps from the California Department of Fish and Wildlife's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species document state the Western Bumble Bee's current range has contracted and has been reduced to high elevation areas. Furthermore, survey data collected from the California Bumble Bee Atlas also supports the notion that the species' current range has contracted to areas far beyond its historic range. Considering both factors indicate the species range does not overlap with the Project's study area, the occurrence determination for this species should be changed to "absent".
10. Page 3.4-2: Table 3.4-1 Vegetation Communities in the Biological Resources Study Area- veg community classification is very high-level and non-descriptive, which makes it difficult to understand or assess vegetation resources within the study and project areas. The table needs to be revised to be more specific including information on vegetation community type and specifically identify which vegetation communities are sensitive natural communities per the California Department of Fish and Wildlife.
11. Page 3.4-7: Figure 3.4-1e- area across from PG&E Metcalf Substation (north of Hwy 101 at the base of Coyote Ridge) is mapped as annual grassland; however, this area is underlain by serpentine soils and serpentine grassland. There are also documented occurrences of sensitive plants located within the mapped area (Metcalf Canyon jewelflower, smooth lessingia, hall's bush mallow, SCL dudleya). Maps need to be revised to accurately reflect sensitive natural communities known to occur.
12. 3.4-8: Sensitive Natural Communities are incomplete and do not include the known mapped serpentine-associated communities in the project area. The serpentine-associated communities need to be mapped in the project area.
13. Pages 3.4-12 to 3.4-14: Section 3.4.2.1 Special Status Plants- text notes that CNDDB, USFWS and CNPS data resources were consulted for a 5 mile radius of the biological resources study area. There are known and documented occurrences of sensitive and listed plant species clearly identified and spatially displayed in these resources that overlay the project study area. This section needs to add additional species- Mt. Hamilton thistle (Cirsium fontinale var. campylon) and smooth lessingia (Lessingia micradenia var. glabrata).
14. Pages 3.4-40 to 3.4-52: Impact 3.4-1: Impact assessment conclusion should be revised to include more than just the four plant species listed- there are additional species such as Malacothamnus hallii, Lessingia micradenia var. glabrata, and Streptanthus albidus ssp. peramoenus known to occur in the project area that should also be assessed for potential impacts.
15. Pages 3.4-52 to 3.4-54: Impact 3.4-2: Should include an evaluation of potential impacts to serpentine-associated sensitive natural communities which are known to occur within the project area. Please revise.
16. Pages 3.4-52 to 3.4-54: Impact 3.4-2: states that the project would impact 3.5 ac of temporary impact to riparian habitat. If the impact will result in tree removal or excessive root disturbance or work within the TPZ (defined Tree Protection Zone), is this impact still considered to be temporary? If so, please elaborate in more detail. Also, as noted previously, list of sensitive natural communities that could potentially be impacted by the proposed project is incomplete as there not an assessment of potential impacts to serpentine associated vegetation communities. Please revise.
17. Page 3.4-42: LSPGC Mitigation Measure 3.4-1: Avoid Impacts to Rare Plants:

a. Under 2).: why does the language include "…but that may kill living plants or severely alter their ability to reproduce"? If the activities are timed to occur during the dormant season of plants, there should not be any killing of living plants or impacts to their ability to reproduce, at least for annuals. For perennial plants, the activity during a dormant season would not automatically sufficiently reduce an impact to LTS. Please revise.
b. Under 5).: "…or relocation of plants to appropriate locations by a qualified botanist"- this language should be removed due to the high potential of plant pathogens such as Phytophthora being introduced during relocation activities (such as movement of soil with plant roots that could be or could become contaminated during that activity). Also, the CA Native Plant Society has a long-standing policy against relocation/transplantation activities being used as a mitigation measure.
c. There is no related mitigation measure that addresses how impacts will be assessed and minimized to a less than significant level, if impacts to sensitive and/or listed plant species cannot be avoided. This is an omission in this EIR- please revise/add an appropriate mitigation measure to address this.

18. Page 3.4-48: The last paragraph states that burrowing owls are not a species covered by the Santa Clara Valley Habitat Plan. This is incorrect, the owl is a covered species under the Santa Clara Valley Habitat Plan.
19. Pages 3.4-53 to 3.4-54: LSPGC Mitigation Measure 3.4-3 and 3.4-4: These mitigation measures do not include all the sensitive natural communities that may be found within and impacted by, the proposed project. These mitigation measures should be revised to include serpentine-associated sensitive natural communities.
20. Page 3.4-35: APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas: this APM states that vehicles and equipment will be cleaned prior to use in native habitat, but does not give any specifics at all on how the cleaning will occur, where it will occur, or any other detail on method (such as washing off site at truck wash facility prior to arrival, thorough removal of soil, mud and debris from vehicle or equipment tires, tread, undercarriage, bucket loaders, interior of vehicle, etc.). The measure also does not include any mention of vehicle or equipment inspections or a QA/QC process. Please revise to include these specifics and give more detail on this measure.
21. While the DEIR outlines standard dewatering practices, including pumping groundwater to trucks or containment tanks and discharging only after meeting water quality standards, it lacks estimates of expected dewatering volumes and assessments of localized impacts on groundwater levels, nearby wells, or stormwater infrastructure. These details need to be provided to properly assess potential site-specific groundwater drawdown risks.
22. The use of unlined stormwater detention basins aims to promote infiltration and groundwater recharge. However, at the Grove HVDC Terminal site where shallow groundwater exists, infiltration capacity may be limited, and there is risk of groundwater mounding causing nuisance conditions. Based on Valley Water's Historical Groundwater Elevation Data web page (https://gis.valleywater.org/Wells.html), the site has a generalized depth-to-first groundwater from 0-5 feet below ground surface (bgs). It would be important to confirm that site-specific hydrogeologic investigations have been conducted to evaluate the appropriateness and potential impacts of infiltration under these conditions.

    The proposed unlined stormwater detention basins (Grove HVDC site) do not meet the minimum 10-ft vertical separation distance to seasonally high groundwater, as required in the Valley Water guidelines for infiltration devices. Any proposed stormwater infiltration devices, such as retention/detention basins should adhere to the requirements in Table A-1 of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) C.3 Stormwater Handbook,

including vertical separation to seasonally high groundwater and horizontal setbacks from water supply wells, septic systems, and contaminant release sites. In complying with all local and state stormwater regulations, all efforts should be made to protect groundwater quality and ensure that infiltration rates in the soil allow the bioretention areas to accommodate receiving runoff.

23. The proposed placement of unlined stormwater detention systems near oil-containing transformer equipment poses water concerns:
    a. **Risk of Contaminant Infiltration:**
    Unlined detention basins promote infiltration, which could allow oil or other contaminants from spills to reach the subsurface and impact groundwater quality. To mitigate this risk, it is recommended to line stormwater detention systems or provide effective pretreatment before infiltration. Secondary containment features, groundwater monitoring, and leak detection systems at critical locations should also be implemented to detect contamination early. Adequate vertical separation distance between the base of any infiltration device and/or oil-containing (transformers) infrastructure and seasonally high groundwater provides critical treatment for infiltrating stormwater and reduces the risk of direct groundwater contamination in the event of an oil leak, unintended release, or infrastructure failure (refer to SCVURPPP C.3 Stormwater Handbook).
    b. **Shallow Groundwater Concerns:**
    At sites with shallow groundwater such as Grove, infiltration systems near oil equipment without additional safeguards could promote contaminant migration into shallow and deeper groundwater zones, adversely affecting groundwater quality. As previously noted, the proposed infiltration device does not meet the minimum 10-foot vertical separation distance to seasonally high groundwater as outlined in Table A-1 of the SCVURPPP C.3 Stormwater Handbook. All efforts should be made to protect groundwater quality and ensure that stormwater infiltration and potential contaminant releases from oil-containing infrastructure does not degrade or threaten the groundwater quality in the area.
    c. **Containment Failure Scenarios:**
    While oil containment basins are designed for a 25-year, 24-hour storm event, extreme events (e.g., 50- or 100-year storms), liner degradation, or accidental overflows could lead to oil release, increasing groundwater contamination risk. These scenarios need be considered in design and contingency planning. The risks noted above need to be addressed to ensure the protection of groundwater quality below the site.
    d. **Uncertainty in Design Details:**
    The DEIR does not clearly specify the proximity of stormwater detention systems to oil-containing equipment, nor the extent of separation, secondary containment, or groundwater monitoring. Additional details on these elements are needed to evaluate potential impacts to groundwater quality.

24. **Construction and Long-Term Operation Activities:** Ensure that lubricants, petroleum hydrocarbons and fuels, PFAS containing materials, fire retardants, heat/electrical insulating agents, soluble metals, and other industrial agents are avoided in the construction and installation of the underground transmission line and long-erm operations.
    a. LSPGC APM HAZ-1 requires that a site-specific spill control and countermeasures plan be prepared before storage of hazardous liquids on the Project site. The requirements for secondary containment of such substances as transformer mineral oils need to need to be included in the spill control and countermeasures plan to reduce the release of contaminants.
    b. Ensure that construction activities do not degrade surface water or groundwater via use of above chemicals, ground disturbance, and/or the introduction of sediments or and other

pollutants into water or by mobilizing existing sediment and other pollutants that may be present at the Project sites.

25. Page 3.10-7: The active groundwater wells on the Skyline HVDC Terminal site must be properly destroyed under a Valley Water Wells permit, if they will no longer be needed
26. Page 3.10-15: The discussion on the Water Resources Protection Manual needs to be corrected to read “Valley Water adopted the Water Resources Protection Manual in 2006 in collaboration with the cities in Santa Clara County and Santa Clara County…” for accuracy.
27. Page 3.19-18: Water for construction use would not be supplied by Valley Water directly. Please update the language appropriately.

Please let me know if you have any questions on the comments. We appreciate the opportunity to review and provide comments on the DEIR for the Power Santa Clara Valley project. Please send to us for review any subsequent CEQA documentation for our review. This project has been assigned to Valley Water File 34968. Please reference this number on future correspondence regarding this project.

Thank you,

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Santa Clara Valley Water District is now known as:

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