

August 19, 2013

Mr. Pete Mizera
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, CA 95814

Re: Comment Letter – Nguyen Property Case Closure Summary
Fuel Leak Investigation
960 South King Road
San José, California

Dear Mr. Mizera,

The City of San José appreciates the opportunity to provide comments on the August 12, 2013 State Water Resources Control Board's Notice of Opportunity for Public Comment regarding the recommendation for case closure of the leaking underground storage tank case at 960 South King Road in San José. The City owns and operates Emma Prusch Park, a 42-acre farm park located just west of the Nguyen property. The park is dedicated to demonstrating farm life and contains several orchards and community gardens. An agricultural production well is located on the park site, about 290 feet west of the Nguyen property.

City staff has reviewed the Santa Clara County Department of Environmental Health's on-line records of the fuel leak investigation and are concerned that the groundwater contamination has not been adequately characterized off-site. Some of the data appears inconsistent over the years and the most recent groundwater monitoring results dated May 2011 is not included in the analyses. The City is concerned with the potential migration of groundwater contamination beneath the park, specifically the relatively high concentrations of MtBE and benzene found in groundwater monitoring wells sampled at 960 South King in May 2011 and other monitoring events.

The agricultural production well located at Emma Prusch Park is currently used for demonstration purposes a few times a year. In 2007 a windmill was installed over the well with the intent to connect the well to the waterline to irrigate the orchards and gardens. Although this connection has not been implemented, it is possible that the City may want to activate the well in the future to use for irrigation.

Based upon our review of the available information, the City would like a more complete evaluation of the groundwater contaminant plume from the Nguyen property that addresses any potential impacts to Emma Prusch Park..

Thank you for the opportunity to comment on this fuel leak site. I may be reached at (408) 975-2587 or e-mail ken.davies@sanjoseca.gov or further discussion.

Sincerely,



For

Ken Davies
Environmental Compliance Officer
City of San Jose Environmental Services Department