

Green Stormwater Infrastructure Plan

City of San José

200 E. Santa Clara St.

San José, CA 95113

sent May 15, 2019 via email to GSI@sanjoseca.gov

re: public comment on the Draft SJ GSI Plan

Dear Sir/Madam,

I am writing as an individual who attended the public Green Stormwater Infrastructure (GSI) workshop at the Roosevelt Community Center last November and also attended a presentation on the topic at SPUR this April; I have also studied portions of the 292 page document that is online at <http://www.sanjoseca.gov/DocumentCenter/View/84047>. I write to express my personal thoughts and concerns on the Draft GSI Plan.

As I've said to Sharon Newton, City of SJ Deputy Director -- Watershed Protection, I am supportive of the overall GSI goals, and was even Project Manager myself for a small stormwater runoff mitigation project some 25 years ago.¹ I applaud the city's efforts to control rainwater runoff, and admire such projects as the recent upgrade to Park Ave. and the new segment of Cherry Ave. near Fwy. 85. (But please be sure to design all projects with public safety in mind: don't, for example, have drainage curb-cuts with sharp corners like those shown on p. 51 and 71 of the report: they can be hazardous to bicyclists and motorists alike.) And at various creek-trail planning meetings, I've promoted the possibility of "daylighting" culverts and the ends of some storm drains: digging them out for the last 50' or so and creating open-air channels with natural habitat and water-filtering vegetation, thereby replacing the creek's currently straight engineered walls with a more interesting streambank "shoreline" with tributary "glens".

However, I am quite concerned by the proposals in the Draft GSI to use City Park land as part of the stormwater treatment plan. The proposals are not for basins or floodplains to help catch the infrequent flood-event waters, but instead these are meant to catch and filter all the water that flows year-round from the storm drains. I myself have observed that there is frequently at least a modest water flow in some storm drains year-round from malfunctioning irrigation systems or people washing their cars, and thus any area that intercepts such flows would likely be damp/muddy/marshy at least much of the time and not suited for park use. For example, the Draft GSI shows plans for a lovely grassy basin at the River Oaks Pump Station, but I've seen a photo of a similar project (at the Water District's demonstration site in Morgan Hill) that appears to be a mosquito-breeding swamp. Indeed, the Draft GSI admits "The basins may include some engineered low areas to accommodate sustained wet conditions due to the presence of dry-weather flows" -- but just adding that "The basins can be aesthetically enhanced with new well-suited grasses, trees, and shrubs" doesn't address the mosquito concern. Also, the filtering process will tend to concentrate any debris in the runoff, including any animal waste that wasn't picked up by the owners: would there be odors from this collected waste? Who maintains the site to minimize mosquitos and odors?

¹ Please see our technical report, <http://wgbackfence.net/LosGatosCreekUrbanStreamRestorationProject.pdf>

The Draft GSI shows plans to use the 7.8 acre disc golf area in Kelley Park, saying that “basins and floodable spaces are anticipated to occupy about half of the disc golf course area.” I’d like to raise a number of questions and concerns:

- Would the basins and floodable spaces be fenced off for safety to keep the public from entering when flooded?
- Would the basins and floodable spaces be useable when not flooded, or would the soil be too damp and marshy, or covered with silt and debris? Would public access damage the drainage infrastructure and disturb the plantings? Who would be responsible for removing any fencing and cleaning up the site for public access?
- How could the disc golf course function if half the course is “off-limits” some or all of the time? How would errant discs be retrieved? Would staff be available on-call to assist in their retrieval, or would the discs just accumulate in the drainage areas?
- I believe that disc golf is just an “interim” use of the area, and it might move if/when a better golfing site is found and/or when a better and higher use of this area arises. How would the roughly 4 acres of drainage basins impact the future use of this public park land?
- I recall from past elections that the “taking” of dedicated public parkland for any non-park purpose, even for a city-sanctioned purpose like a fire station, required approval by the voters of San José. These 4 acres of park land are not “free”: at the very least, it involves the cost of a citywide election, and I think it also requires that PRNS receive either a fair-market reimbursement or a suitable in-kind land swap.
- This site is quite near the planned Vietnamese Community Center: would that be impacted by any insects or odors from the drainage basins?

The Draft GSI also discusses using the Roy M Butcher Park. This park has a single ballfield, and the plan is to bury storage or drainage structures beneath the outfield. The Draft GSI says “Installation of the storage tanks could be phased to preserve at least one recreational field area throughout construction”, but how can that be when there is just the one field, and it isn’t operational without its outfield?

San José does not have a surplus of parkland, and the land we do have available should not be given over to non-park uses. I highly recommend that the concepts and plans in this Draft GSI for the use of public parkland be brought before the SJ Parks & Rec. Commission (PRC) for discussion and comment prior to the finalization of this GSI Plan. I also urge you to reach out to the park advocacy community and other community activists: I believe the plan could benefit from input from these advocates as well.

Good luck! I look forward to hearing the discussions and comments at the future public outreach meetings.

~Larry Ames,
longtime stream and park advocate.

cc: San Jose PRNS: Jon Cicirelli, Acting Director; Nicolle Burnham, Deputy Director
San Jose Parks & Rec Cmsn: Rudy Flores, Chair; Melrose Hurley, staff
San Jose Parks Advocates: Jean Dresden, Founder/Lead
Committee for Green Foothills: Megan Fluke, Exec. Dir.; Alice Kaufman, Advocate