

Attachment 1  
2015 Morgan Hill Urban Water Management Plan  
Public Comments

**Comment 1**

[text] pg 1-4 1.5 PUBLIC PARTICIPATION AND PLAN ADOPTION  
Law 10642.

Each urban water supplier shall encourage the active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of the plan.

Comment:

Other than the RFP in December 2015 and the City Council item to approve the contract to prepare the plan, I am unaware of any other public outreach to "encourage the active involvement of diverse ... elements of the population ... prior to and during the preparation of the plan".

Response:

The City is following the notification procedures required by the Urban Water Management Planning Act (UWMPA), and which include notifications in the newspaper and holding a formal public hearing, currently scheduled for July 20, 2016. Additionally, the City held an Open House on June 16, 2016, and invited the public for comments. It should be noted that this Open House was not required by the UWMPA but rather included by City staff in an effort to further engage public participation and comments.

**Comment 2**

[text] pg 2-2 2.5 COORDINATION AND OUTREACH  
The City has submitted its draft plan to regional stakeholders

Comment:

Stakeholders, noticed on March 28, 2016, summarized in Table 10-1, are City of Gilroy, Santa Clara Valley Water District, and Santa Clara County. Why not San Martin?

Response:

The City considers Gilroy a stakeholder because of the existing wastewater and recycled water partnership. The City does not share a similar relationship with San Martin. The 60-Day notification period states "that cities and counties must be notified that the supplier will be reviewing the UWMP and considering amendments to the Plan." San Martin is an unincorporated community and therefore under the jurisdiction of the County of Santa Clara. The County was notified of the City's intent to update the UWMP in accordance with the UWMPA.

**Comment 3**

[text] pg 4-5 4.3 DISTRIBUTIONS SYSTEM WATER LOSSES

Table 4-4 12 Month Water Loss Audit Reporting Reporting Period Start Date Volume of Water Loss 420 (AF) pg 4-1 4.2.1 Historical Water Use In 2015, domestic water use totaled approximately 5,401 AF

Comment:

$420\text{AF}/5401\text{AF} = .077 = 7.7\%$ . How much energy is used to pump and distribute this non-revenue water? What efforts are being made to reduce this further? What is our target Water Loss?

Response:

The City maintains an active program for controlling water loss consisting 24 hour leak response, annual water audit, and meter accuracy checks. In addition the City has an active main replacement program that focuses on replacing mains with frequent leaks and/or known problematic materials. The City does not have a published water loss target.

#### **Comment 4+5**

[text] pg 5-1 5.1 2010 UWMP BASELINE AND TARGETS

Average gpcd from 2001 to 2010 remained relatively flat at approximately 200 gpcd. Conservation efforts [lowered] water consumption to a per capita rate of 123 gpcd in the year 2015. Table 5-1 Baselines and Targets Summary  
Per Capita Water Use Average 2015 Interim  
Confirmed 2020

(gpcd)	Baseline	Target	Target
	199	179	159

#### **5.8 2015 COMPLIANCE DAILY PER CAPITA WATER USE**

Using the City population and gross water use for 2015 compliance year, the per capita water use was calculated as 123 gpcd, meaning the City has met the 2015 interim target per capita water use of 179 gpcd.

Comment:

While it is noted that there was an on-going drought, I think you should stress that the 2015 123 gpcd is a result of a 4-year drought and invocation of stage 1 and stage 2 drought ordinance restrictions.

Response:

Comment incorporated in to UWMP text.

Text added to UWMP: *It should be noted that the 123 gpcd water use is the result of the on-going drought and corresponding Water Shortage Contingency Plan implementation measures. Should the drought end prior to 2020 compliance notification, the City will monitor and encourage continued water conservation in an effort to meet the 2020 water use target.*

Comment:

The 2015 and 2020 targets are 10% and 20% reductions, respectively, as required by the "20X2020" goals. CHAPTER 9 DEMAND MANAGEMENT MEASURES gives categories where reductions are suggested. How much demand reduction is estimated for each category? How to determine actual reduction contribution for each category?

Response:

Senate Bill 7 Extraordinary Session 7 (SBx7-7) requires that an overall reduction of 20 percent be achieved by year 2020. The UWMPA and SBx7-7 do not require reporting reductions for individual Demand Management Measure categories.

### **Comment 6**

[text] pg 6-1 6.2.1.1 Groundwater Basin

The City is located above two groundwater subbasins: the Llagas subbasin of the Gilroy-Hollister Groundwater Basin and the Coyote Valley subbasin of the Santa Clara Valley Groundwater Basin.

[text] pg 6-6 Table 6-1 Groundwater Volume Pumped

Alluvial Basin Santa Clara Valley Groundwater Basin, Santa Clara Subbasin

Comment:

Residents of Morgan Hill only hear about the Llagas subbasin and control by the Central Coast Water Control Board. And the Coyote Valley subbasin is usually referred to (by SCVWD) as the Santa Clara subbasin. Table 6-1 uses "Santa Clara" Subbasin.

Response:

Coyote Valley is a subarea of the Santa Clara Subbasin. The UWMP has been adjusted to reflect this naming convention.

### **Comment 7+8**

[text] pg 6-1 6.2.1.1 Groundwater Basin

The January 2016 Groundwater Condition Report from SCVWD notes that groundwater levels were below the 5-year average for both the Coyote Valley subbasin and the Llagas subbasin. Based on the South County Water Supply Planning Project dated July 2010, the Llagas Subbasin is expected to experience a water supply shortfall in 2030 demand projections.

[text] pg 6-3 6.2.3 Overdraft Conditions

The Santa Clara Valley Groundwater Basin is not an adjudicated groundwater basin. According to the DWR 2003 Bulletin 118 the Santa Clara Valley Groundwater Basin is not in a condition of overdraft. ...

As a result of modeling runs, the SCVWD predicted that groundwater demands for the Llagas Subbasin will increase by approximately 7,000 afy, and more than 4,000 afy of supplemental water will be necessary to maintain design groundwater management objectives.

[text] pg 6-6 6.2.4 Historical Groundwater Pumping

There are 16 existing municipal groundwater wells located in the City.

The combined supply capacity for these wells is approximately 21,640 afy.  
[text] pg 7-1 7.1.1 Legal Factors

These groundwater basins and subbasins are not adjudicated basins and no legal factors are expected to limit the availability of supply.

Comment:

The California Department of Water Resources (DWR), for purposes of the Sustainable Groundwater Management Act (SGMA), classifies the Llagas subbasin as high priority and the Coyote Valley subbasin as medium priority. SCVWD proposes to be the groundwater Sustainability Agency (GSA). Because our basins are not in overdraft, the GSA has until 2022 to create a Groundwater Sustainability Plan (GSP), whose powers may include the ability to meter wells, restrict groundwater pumping, and to implement and fund conjunctive management projects.

Response:

Formation of a Groundwater Sustainability Agency the Santa Clara Valley Water District has been noted in the UWMP.

Comment:

Next MH CIP has \$2.0 million for New Well Property/Construction. Reason: New water wells are required to meet the City's water supply needs as Morgan Hill grows and to provide the necessary reliability during drought conditions. The District, commenting on the DEIR for the MH General Plan update said The discussion of water supplies is based on the City's pumping capacity. It should be based on whether groundwater supplies are sufficient to meet demands rather than pumping capacity.

Response:

Based on discussions during the Open House on June 16,2016, a groundwater supply versus demand table, which was not required by the UWMPA, is included in the UWMP to address water supply availability. Note that the groundwater supply is managed by the Santa Clara Valley Water District, and these tables reflect the current planning assumptions.

## **Comment 9**

[text] pg 6-8 6.5.1 Recycled Water Coordination

The City does not utilize recycled water due to economic infeasibility and it is not considered as a future source of supply.

[text] pg 6-8 6.5.1 Recycled Water Coordination

At this time the recycled water system only serves users in the City of Gilroy service area and no infrastructure exists to convey recycled water to Morgan Hill. The 2015 South County Recycled Water Master Plan Update explored several project alternatives for conveying recycled water to the City but not enough benefit was presented, due to small recycled water demands and the high cost of infrastructure that would be required, for them to be considered as viable alternatives.

[text] pg 6-13 6.5.5 Actions to Encourage and Optimize Future Recycled Water Use

No financial or other incentives can currently be provided to encourage the use of recycled water due to the lack of availability and economic infeasibility.

[text] pg 6-14 6.8 FUTURE WATER PROJECTS

As discussed in previous sections the City's sole source of potable water is groundwater. As such, the only method available to provide additional supply capacity for growing demand is the construction of new wells, and there are no additional types of future water projects the City plans to implement.

[text] pg 6-15 6.9 SUMMARY OF EXISTING AND PLANNED SOURCES OF WATER

The City's groundwater supply has historically been adequate to meet the City's historical demands. However, the City's groundwater supply sustainability is dependent on raw water deliveries negotiated and imported by Santa Clara Valley Water District to the Coyote Valley and Llagas Subbasin. These deliveries are intended to recharge the groundwater aquifer.

[text] pg 6-3 6.2.3 Overdraft Conditions

As a result of modeling runs, the SCVWD predicted that groundwater demands for the Llagas Subbasin will increase by approximately 7,000 afy, and more than 4,000 afy of supplemental water will be necessary to maintain design groundwater management objectives.

[text] pg 7-5 7.4 REGIONAL SUPPLY RELIABILITY

The City's supply reliability is dependent on the rate of available recharge for the groundwater subbasins beneath the City. SCVWD imports raw water for the purpose of recharging the Llagas and Coyote Valley groundwater subbasins. During periods of drought, the imported water supplies available to SCVWD can be reduced or not provided at all, which would reduce the amount of recharge available to the groundwater basins.

**Comment:**

The City needs to start thinking about water in 21st Century terms of expensive water versus no water. Imported water deliveries for use to recharge the groundwater basin have been reduced during the drought years. You must address groundwater recharge in the absence of imported water. Next MH CIP has Water Supply Planning (Project No. 623014). This project would begin the planning and technical studies necessary to position the City to use recycled water and stormwater for groundwater recharge. Next General Plan, Safety, Services, and Infrastructure Element, Water Supply, GOAL SSI-14 High quality water resources, managed effectively. Policy SSI-14.13 Use of Recycled Water. Action SSI-14.B Gray Water.

**Response:**

The groundwater supply is managed by the Santa Clara Valley Water District, and will continue to monitor and balance the water supply needs for the City of Morgan Hill.

**Comment 10**

[text] pg 7-1 7.1.3 Water Quality Factors

The primary water quality factors that could potentially impact the City are related to perchlorate, nitrate, and hexavalent chromium contamination.

Comment:

See SCVWD Salt and Nutrient Management Plans for the Santa Clara (November 2014) and Llagas (December 2014) Groundwater Subbasins. Projected groundwater concentrations of salts and nutrients (total dissolved solids and nitrate) in groundwater remain within water quality thresholds established in the Regional Water Quality Control Boards' Basin Plans for the Santa Clara and Llagas Subbasins. Nitrate is projected to decrease in both subbasins, while salt is projected to increase in the Santa Clara Plain area of the Santa Clara Subbasin and decrease in the Coyote Valley area. Salt concentrations are projected to remain relatively unchanged in the Llagas Subbasin. Imported water contains salt. Use of recycled water for irrigation introduces only a minor portion of total salt loading and is supported by the anti-degradation analysis in the SNMPs.

Response:

No changes made to the UWMP.

#### **Comment 11**

[text] pg 8-11 8.8 CATASTROPHIC SUPPLY INTERRUPTION

The City has an Emergency Response Plan (ERP) that provides a framework for the City to address a catastrophic supply interruption in the following areas: Regional Power Outage, Earthquake

Comment:

Can wells function if submerged? What wells are in the 100-year flood plain? What wells are in the inundation area if Anderson Dam fails?

Response:

No changes made to the UWMP. However, the City will address this comment in its Emergency Management Plan

#### **Comment 12**

[text] pg 9-4 9.1.4.3 Water Conservation Rebate Programs The City is currently implementing the following rebate programs in cooperation with SCVWD: Graywater Laundry to Landscape Rebate Program SCVWD provides a Graywater Laundry to Landscape rebate of \$200 per single family residence.

Comment:

I have never seen this advertised in Morgan Hill. In fact, the only public comment from the City on graywater was a staff report by Julie Behzad to the Planning Commission on April 4, 2012 (requested by Commissioner Benich): "It is not recommended making greywater systems mandatory or providing specific incentives for their use at this time." The MH Library did sponsor a workshop on Residential Greywater Design and Techniques in October 2015; the presenter was unfamiliar with Morgan Hill.

Response:

No changes made to the UWMP. The City conservation programs are advertised on the City's website at the following address.

<http://www.morgan-hill.ca.gov/715/Water-Conservation-Rebate-Programs>

### **Comment 13**

Comment:

This is a small town/city and It is obvious, you don't have the resources to support all these new development being built all over the place, and thousand of people moving in, so instead of harassing residents ..(we moved here for peace and quite) Stop issuing permit to build

That is you solution period!

Response:

No change to UWMP. Comment not material the subject.

### **Comment 14**

Comment:

I am unable to attend this upcoming meeting as I will be out of state. I do hope that discussions will take place about the fact that Morgan Hill is growing very quickly (much too quickly in my opinion) and our water infrastructure is very likely not able to sustain this increase in population growth. Expanding and growing our water pipelines, to support this kind of growth, is certainly needed sooner than later. I hope the open house on the 16th is productive.

Response:

No change to the UWMP. However, the City will consider this comment in its Water System Master Plan which deals with water system improvement projects.