

**From:** [D. Muirhead](#)  
**To:** [Angie Gonzalez](#); [Michelle Wilson](#)  
**Subject:** City Council Meeting August 24, 2016 Item #21: 2015 Urban Water Management Plan  
**Date:** Monday, August 22, 2016 11:35:20 AM

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Dear Morgan Hill City Council,

Comments for the Public Record submitted by  
Doug Muirhead, a resident of Morgan Hill, for:  
Morgan Hill City Council  
Meeting August 24, 2016  
Item #21: 2015 Urban Water Management Plan

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The plan still says that Council actions occurred on July 20 and July 27.

I was surprised but quite impressed that my earlier comments on the plan were included here and individually responded to by staff.

I appreciate that City Engineer Bjarke, Management Analyst Jaso, and Deputy Director Repp conducted a public meeting to Inform the community.

It was only at the public meeting that we learned that the report is organized in accordance with the outline suggested by Department of Water Resources (DWR) for the 2015 Urban Water Management Plans. This prevented including some information that I think the community would have found meaningful. For example, Chapter 9: Demand Management Measures gives categories where reductions are suggested.

One question:

How much demand reduction is estimated for each category?

Staff response:

The Urban Water Management Planning Act (UWMPA) and Senate Bill 7 Extraordinary Session 7 (SBx7-7) do not require reporting reductions for individual Demand Management Measure categories.

Both this plan and the CIP promote the view that the only method available to provide additional supply capacity for growing demand and to provide the necessary reliability during drought conditions is the construction of new wells and that there are no additional types of future water projects the City plans to implement.

The plan states that the City's sole source of potable water is groundwater and that the groundwater supply has historically been adequate to meet the City's historical demands. While pumping may exceed recharge during a drought, basin management practices have prevented long-term adverse conditions. Supply reliability is dependent on the rate of available recharge for the groundwater aquifers. SCVWD imports raw water for the purpose of recharging the groundwater subbasins.

The plan states that 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. Council and staff know that imported water deliveries for use to recharge the groundwater basin

have been significantly reduced during the recent drought.

The City must address groundwater recharge in the absence of imported water. Yet the City does not plan to utilize recycled water due to "economic infeasibility" and it is not considered as a future source of supply.

The plan states that no legal factors are expected to limit the availability of supply. This appears to be based on the Sustainable Groundwater Management Act authority for the Santa Clara Valley Water District to become the Groundwater Sustainability Agency (GSA) for our groundwater basins. GSAs will prepare Groundwater Sustainability Plans (GSP) for their basins and subbasins. Since our basins are not in overdraft, those plans would be due to the Department of Water Resources by 2022. Instead, the District will update its 2012 Groundwater Management Plan by the end of 2016 and submit it to DWR in January 2017. This alternative to a SGMA GSP will address the additional mechanisms for management of the basins, which may include the ability to meter wells, restrict groundwater pumping, and to implement and fund conjunctive management projects.

It was only after talking to V. De La Piedra, Groundwater Monitoring and Analysis Unit Manager, at the Morgan Hill Community Meeting on the GSP, that it became clear that the alternate plan takes effect immediately after being submitted to DWR, that is to say, January 2017.

The plan notes the existence of a Graywater Laundry to Landscape Rebate Program offered by the Santa Clara Valley Water District. In response to my comment that I had never seen this advertised in Morgan Hill, staff responded that City conservation programs are advertised on the City's website. This program is not mentioned in the City and SCVWD drought and conservation public service announcements on Channel 17 and not in agenda items before City Council.

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.

Thank you for your consideration,  
Doug Muirhead, Morgan Hill