

File: 24430
Madrone Channel

April 22, 2019

Jim Rowe
City of Morgan Hill
17575 Peak Avenue
Morgan Hill, CA 95037Subject: Notice of Preparation of an Environmental Impact Report for the Morgan Hill
Technology and Mixed-Use Residential Project

Dear Mr. Jim Rowe:

The Santa Clara Valley Water District (Valley Water) has reviewed the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed Morgan Hill Technology and Mixed-Use Residential Project, received by Valley Water on March 25th, 2019. Valley Water is a special district with jurisdiction throughout Santa Clara County. Valley Water acts as the County's groundwater management agency, wholesale water provider, principal water resources manager, flood protection agency, and the steward for its watersheds, creeks, and underground aquifers. Valley Water requests the following issues be addressed and discussed in the Draft EIR:

The proposed development site is adjacent to Valley Water's Cross Valley Pipeline, Coyote-Madrone Half Road Pipeline, and Madrone Channel. Cross Valley Pipeline exists within Valley Water's easement along Cochrane Road to the north of the development, and Coyote-Madrone Half Road Pipeline exists along Half Road to the south side of the development property. Madrone Channel within Valley Water fee title right of way is located west of the development along Highway 101. In accordance with Valley Water's Water Resource Protection Ordinance, any modifications to Valley Water right of way or facilities require an encroachment permit. The Draft EIR should discuss whether improvements for the project will require a Valley Water encroachment permit, and if so, identify Valley Water as a Responsible Agency.

The Biological Resource section should address compliance with or applicability to the Santa Clara Valley Habitat Plan with respect to the Category 2 stream setbacks from Madrone Channel.

The development of the 89-acre site will increase the amount of impervious area on the site, resulting in increased storm water runoff and potential water quality impacts. The Hydrology and Water Quality section should include a discussion of the impacts resulting from the increased storm water runoff from the development to Madrone Channel, which is a tributary to Llagas Creek and the Pajaro River. The hydrologic analysis should identify the existing and

proposed condition drainage patterns, rates of runoff, and volume of runoff for various events (i.e. 2-year, 10-year, 100-year, etc.) The analysis should demonstrate that increased runoff from the development will not induce, exacerbate, or increase the frequency of flooding in Madrone Channel, East Little Llagas Creek, Llagas Creek, or Pajaro River or provide appropriate mitigation measures to prevent any adverse impacts to downstream receiving waterbodies. The discussion on post-construction water quality should include Llagas Creek, its listing under Clean Water Act Section 3031(d), and mitigation measures to address adverse water quality impacts resulting from the development of the site.

Most open areas of Morgan Hill provide natural recharge to aquifers in the Llagas Subbasin, including the project site. Groundwater is the sole drinking water source of south county. The EIR will need to examine the reduction in natural groundwater recharge from development of the site and the increased risk to groundwater quality from contaminant releases associated with industrial (and other) land uses. Onsite storm water management will need to include sufficient treatment to ensure groundwater protection and to minimize the loss of groundwater recharge.

The site is adjacent to the Madrone Channel, which Valley Water utilizes for managed groundwater recharge, and eventually flows into Llagas Creek. Impacts to Madrone Channel will need to be considered, and Morgan Hill should require a sufficient buffer between proposed development and the channel to allow space for storm water filtration, maintenance of the channel, and recreational opportunities or enhancements to the City's adjacent trail.

Abandoned or unused wells can provide a vertical conduit for contaminants to pollute groundwater. All wells on the property should be identified and abandoned or unused wells must be properly destroyed in accordance with Valley Water's well ordinance.

The NOP states that a Water Supply Assessment (WSA) will be prepared pursuant to SB610 to analyze the availability of water to serve the project in the future in both normal and drought conditions. Valley Water requests the opportunity to review the draft WSA prior to action by the City to comment on the consistency with countywide water supply planning efforts.

Future water demand of the project can be limited by incorporating on-site reuse for both storm and graywater and requiring water conservation measures above State standards (i.e., CALGreen). To reduce or avoid adverse impacts to water supply, the City and applicant should consider the following:

- Landscaping that meets or exceeds the requirements of the City's water efficient landscape regulations;
- Weather- or soil-based irrigation controllers;
- Dedicated landscape meters; and,
- Submeters for multi-family housing and individual spaces within commercial buildings;

Page 3

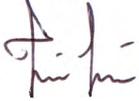
April 22, 2019

Jim Rowe

Notice of Preparation of an Environmental Impact Report for the Morgan Hill Technology and Mixed-Use Residential Project

If you have any questions, or need further information, you can reach me at (408) 630-3098, or e-mail at tlin@valleywater.org. Please reference Valley Water File No. 24430 on further correspondence regarding this project. Please forward a copy of the Draft EIR when available for public review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tin Lin', with a stylized flourish at the end.

Tin Lin

Associate Engineer – Civil

Community Projects Review unit

Santa Clara Valley Water District

Cc: U. Chatwani, M. Martin, M. Richert, V. De La Piedra, Y. Arroyo, T. Lin, File