
San Francisco Bay Regional Water Quality Control Board

April 22, 2019

Sent via electronic mail: No hardcopy to follow

City of Morgan Hill, Community Development Department
ATTN: Jim Rowe, Project Manager (jim.rowe@morganhill.ca.gov)
17575 Peak Avenue
Morgan Hill, CA 95307

Subject: San Francisco Bay Regional Water Quality Control Board Comments on the Notice of Preparation for the Morgan Hill Technology & Mixed-Use Residential Project draft Environmental Impact Report, City of Morgan Hill, Santa Clara County, California
SCH No. 2019039132

Dear Mr. Rowe:

San Francisco Bay Regional Water Quality Control Board (Water Board) staff appreciates the opportunity to review the *Notice of Preparation for the Morgan Hill Technology & Mixed-Use Residential Project draft Environmental Impact Report, City of Morgan Hill, Santa Clara County, California* (NOP), which was received by the Water Board on March 26, 2019. The NOP presents the proposed scope of the draft Environmental Impact Report (draft EIR) for the Morgan Hill Technology & Mixed-Use Residential Project (Project). The Project includes the development of an 89-acre former orchard, west of Mission View Road and south of Cochrane Road in the City of Morgan Hill.

Summary

The draft EIR should establish if the Project site is within the jurisdiction of the San Francisco Bay Regional Water Quality Control Board or the Central Coast Regional Water Quality Control Board. The draft EIR should also evaluate the Project's potential impacts to hydrology and water quality.

Comment 1.**It is not clear if the Project site is in the San Francisco Bay Regional Water Quality Control Board or the Central Coast Regional Water Quality Control Board.**

The NOP identifies Coyote Creek as the nearest water body. However, the Project site is close to the divide between the Coyote Creek watershed and the Llagas Creek watershed. If the Project site drains to Coyote Creek, it is in the jurisdiction of the San Francisco Bay Regional Water Quality Control Board. If the Project site drains to the Llagas Creek watershed, it is in the jurisdiction of the Central Coast Regional Water Quality Control Board.

Comment 2.**The draft EIR should include an assessment of Project impacts on water quality and hydrology.**

The list of categories in the NOP that are to be evaluated in the draft EIR does not include hydrology and water quality. Much of the site consists of a former orchard. Project implementation will significantly increase the amount of the Project site that will be covered with impervious surfaces. This increase in impervious surfaces is likely to increase the amount of pollutants carried in stormwater runoff from the Project site and to affect the hydrograph of runoff from the Project site. Therefore, the draft EIR should include an assessment of Project impacts associated with hydrology and water quality.

If you have any questions, please contact me at (510) 622-5680, or via e-mail at brian.wines@waterboards.ca.gov.

Sincerely,

Brian Wines
Water Resource Control Engineer
South and East Bay Watershed Section

cc: State Clearinghouse (state.clearinghouse@opr.ca.gov)
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