

Anaheim's Stormwater Credit Program

March 18, 2022

Santa Ana Regional Water Quality Control Board Meeting



Anaheim.net

The Issue: Distributed Treatment Systems

- MS4 Permit “New Development” Requirements
- 1000s of distributed treatment systems
- Effective but expensive and inefficient



Moving Toward Regional Treatment



X 100,000

Distributed Septic Systems to
POTWs



X 100,000

Backyard Incinerators to
Regional Landfills



X 100,000

Distributed BMPs to
Regional Stormwater Retention Systems

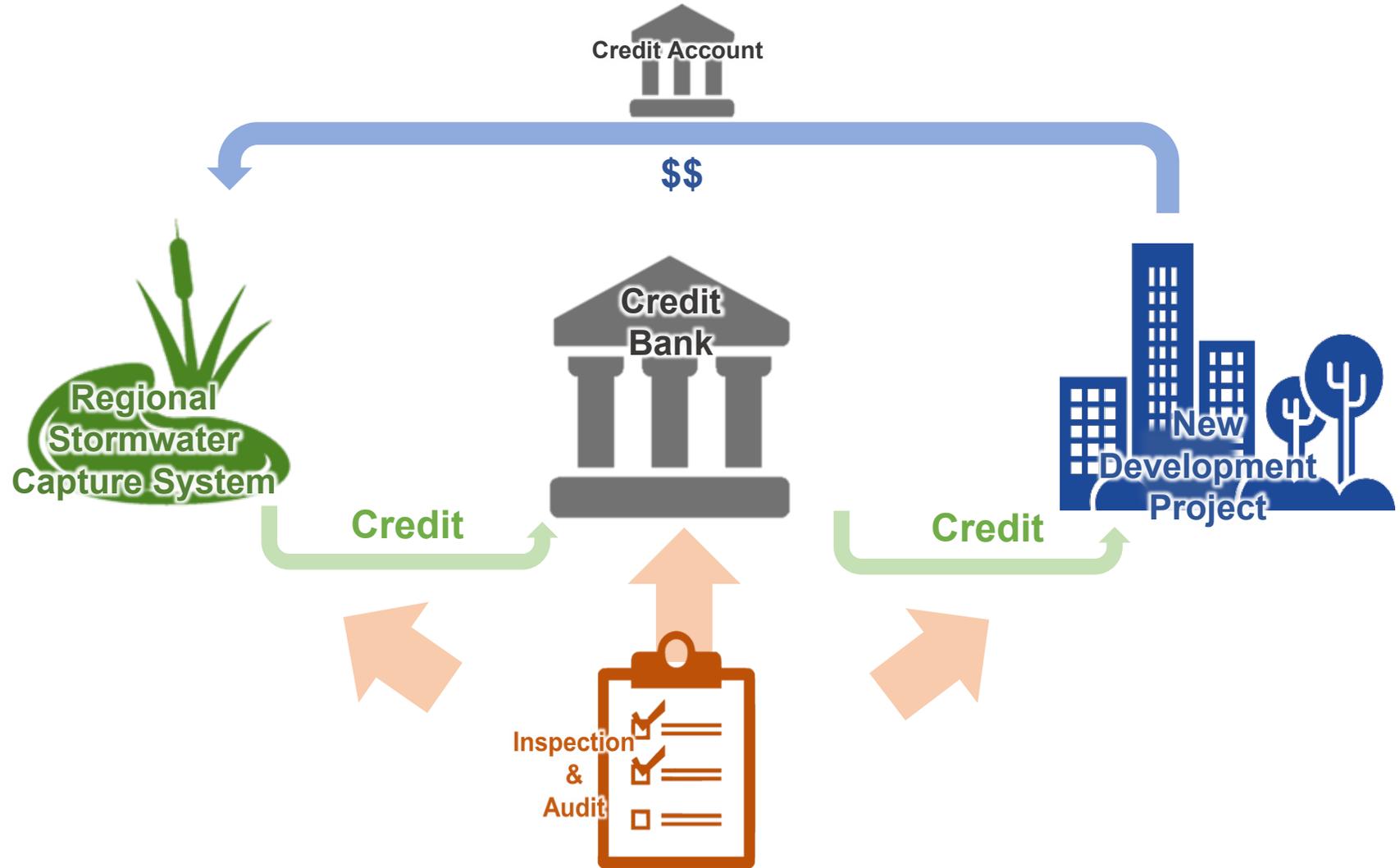


Solution: Regional Stormwater Retention Systems

- First System at **Modjeska Park**
- Improves **Receiving Water Quality** and local **Water Supply** on a **Large Scale**
- 5 times **LESS EXPENSIVE**



Stormwater Credit Program



Key Program Components

- Complies with MS4 Permit
- Credit Generation limited to City-owned projects
- Credits **ONLY** generated after project constructed, operational, and verified
- Accounting System

Entry Info		Project Information						Credit Generator Only										Credit User Only		Watershed Credit Bank Tracking					
Entry ID	Entry Date	Project Name	Project Type <i>(CG1: Enhanced PDP CG2: Stormwater Retrofit CU: Credit User)</i>	SVCGR ID	VQMP ID	Long	Lat	Total Credit Generated <i>(from SVCGR)</i> (eu.ft.)	Credit Adjustment					Total Credits Available for Trade (eu.ft.)	Available Watershed Credits (eu.ft.)	Credits to purchase <i>(From WQMP? Adjust for less than available watershed credits)</i> (eu.ft.)	Beginning Credit Balance (eu.ft.)	Credit Generated for Trade (eu.ft.)	Credit Sold (eu.ft.)	Ending Credit Balance (eu.ft.)					
									Funding Adjustment			Existing PDP Adjustment	Credit Reduction								Credit Retention				
		% Ineligible Funding Contribution	Funding Adjustment (eu.ft.)	Credit Remaining After Funding Adjustment (eu.ft.)	Existing PDP Adjustment (eu.ft.)	Credits Reduction (eu.ft.)	% of the Largest Credit Generator	Existing Watershed Retention	Credit Retention Required?	Credit Retention (eu.ft.)	Credit Remaining After Retention (eu.ft.)														
1	9/7/2019	Credit Generator 1	CG1	12345	54546	33.814	-108	555,390	20%	111,078	444,312	12102	43,221	610,929	0	Y	44,431	399,891	388,969	0	--	0	388,969	0	388,969
2	VW2020	Credit Generator 2	CG2	65410	--	33.814	-108	139,295	30%	41,789	97,506	0	9,751	610,929	44,431	Y	9,751	97,756	87,756	388,969	--	388,969	97,756	0	476,745
3	9/7/2020	Credit User 1	CU	--	12354	33.814	-108	--	--	--	--	--	--	610,929	54,982	--	--	--	--	476,745	10,001	476,745	0	10,001	466,744
4	9/9/2020	Credit Generator 3	CG1	545444	45644	33.814	-107	1,078,110	0%	0	1,078,110	500	107,761	1,185,921	54,982	Y	107,811	970,239	969,849	466,744	--	466,744	869,849	0	1,436,593
5	10/9/2020	Credit User 2	CU	--	45615	33.814	-107	--	--	--	--	--	--	1,185,921	161,993	--	--	--	--	1,436,593	55,500	1,436,593	0	55,500	1,381,093

Note:
 PDP= Priority Development Projects
 SVCGR= Stormwater Credit Generation Report
 VQMP= Water Quality Management Plan



Program Benefits

Accelerates Pollutant Removal = Clean Beaches



Generates Funding for New Regional Projects

Less Costly and Cuts Red Tape for Development



Recharges Aquifer

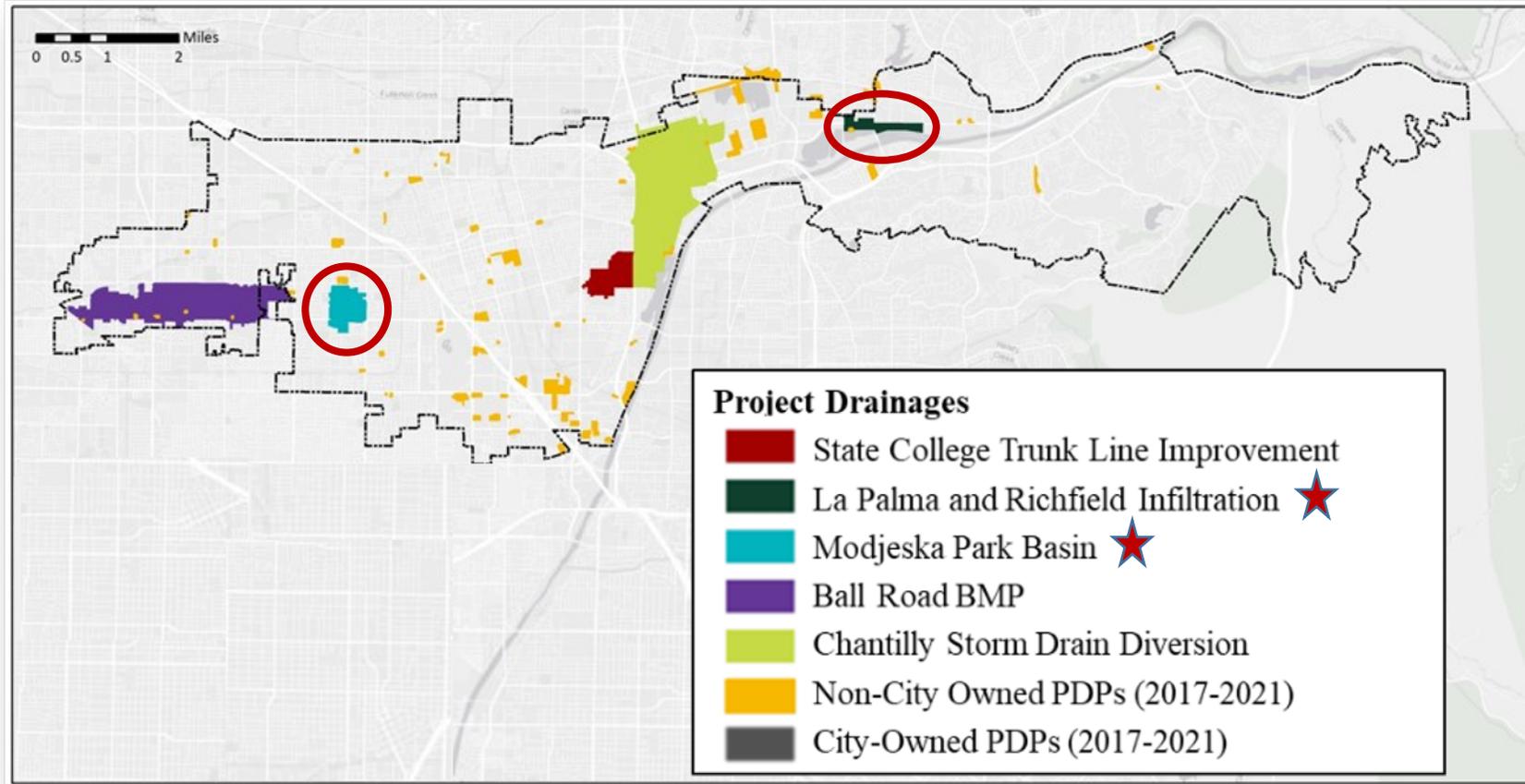
Improves BMP Effectiveness/Efficiency



Flood Control

Traditional Development v. Regional Projects

- Regional Projects create stormwater retention and improve water quality decades sooner than traditional distributed development



Program Outreach

- Orange County Water District
- Orange County Sanitation District
- BIA/CIQWC
- Orange County Coastkeeper
- All 34 Orange County Cities
- California Waterkeeper Alliance
- Natural Resources Defense Council
- San Francisco Bay Coastkeeper
- Irvine Ranch Water District
- County of Orange
- OC Business Council
- San Diego Coastkeeper



Letters of Support

Orange County Coastkeeper



3151 Airway Avenue, Suite F-110
Costa Mesa, CA 92626
Phone 714-850-1965
www.coastkeeper.org

March 9, 2022

Mr. Keith Linker
Principal Engineer
City of Anaheim
Anaheim, CA, 92805

Dear Mr. Linker:

Re: Letter of Support for Further Regional Board Investment in Development of City of Anaheim Draft Stormwater Credit Program

Orange County Transportation Authority



AFFILIATED AGENCIES
Orange County
Transit District
Local Transportation
Authority
Service Authority for
Freeway Emergencies
Consolidated Transportation
Service Agency
Congestion Management
Agency

March 10, 2022

Mr. Keith Linker
Principal Civil Engineer
City of Anaheim
200 South Anaheim Boulevard
Anaheim, California 92805

Subject: **Stormwater Credit Program**

Dear Mr. Linker:

Orange County Business Council



2 Park Plaza, Suite 100 | Irvine, CA 92614 | P 949.476.2242 | F 949.476.0443 | www.ocbc.org

March 11, 2022

Ms. Michelle Beckwith
Chief, Stormwater
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

DELIVERED VIA EMAIL TO: MICHELLE.BECKWITH@WATERBOARDS.CA.GOV

RE: SARWQB March 18, 2022 Meeting: Item 9. Stormwater Credit Program, City of Anaheim

Irvine Ranch Water District



March 10, 2022

Ms. Jayne Joy
Executive Officer
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

RE: Support for Consideration of Water Quality and Stormwater Credit Programs



Letters of Support

Construction Industry Coalition on Water Quality



July 21, 2020

Construction Industry Coalition On Water Quality

Coalition Members



Building Industry Association of Southern California



Engineering Contractors' Association



Southern California Contractors' Association



Mr. Keith Linker
Principal Civil Engineer
City of Anaheim
700 South Anaheim Boulevard
Anaheim, CA, 92805

RE: City of Anaheim Draft Stormwater Credit Program - Letter of Support

Dear Mr. Linker,

The Construction Industry Coalition on Water Quality (CICWQ) would like to thank the City of Anaheim for providing the opportunity to review the City's Draft Stormwater Credit Program and supports the City's efforts to establish a program that can provide a positive impact to the region's stormwater quality as well as promote regional groundwater recharge. The Stormwater Credit Program appears to promote an approach that both streamlines and incentivizes storm water capture and infiltration projects in the City.

Between 2015 and 2017, CICWQ organized and led a team of experts to conduct an engineering case study on the feasibility for using regional water quality credit generating facilities in Orange County, within the Santa Ana River watershed. Consistent with the findings of our work, we believe the City's Stormwater Credit Program will provide an expedited timeline to improve water quality and expand opportunities for regional stormwater capture and infiltration projects over traditional distributed capture and infiltration projects required through the MS4 Permit's New Development/Redevelopment Program.

Having researched stormwater credit programs extensively, this program appears to have been well thought out with careful consideration of important concepts related to the scope of the program, the regulatory framework, safety/resiliency factors to ensure a net benefit to the watershed, and oversight/administration of the program.

We look forward to seeing the City's Stormwater Credit Program move forward and believe that it can serve as a model for others to follow in the region, state, and around the country. Should you or others at the City of Anaheim have any questions or want to discuss the content of our comment letter, please feel free to contact Mark Grey at (909) 525-0623, cell phone, or mgrey@cicwq.org.

Orange County Water District

From: Woodside, Greg <gwoodside@ocwd.com>
Sent: Monday, July 20, 2020 10:59 AM
To: Keith Linker <klinker@anaheim.net>
Subject: Stormwater Credit Program

Hi Keith,

Over the last several months, OCWD and Anaheim have discussed the City's proposed Stormwater Credit Program.

We understand the Stormwater Credit Program will promote and incentivize regional stormwater capture and infiltration projects within the City and potentially serve as a model for other programs in the state.

As you know, OCWD has extensive experience with recharging surface water from various sources into the Orange County Groundwater Basin. Our surface recharge facilities are located in the cities of Anaheim and Orange.

The City's Stormwater Credit Program, as proposed, provides an innovative solution to promote and provide supplemental funding for regional stormwater capture and groundwater recharge projects within the Orange County Groundwater Basin that would not otherwise be required through the existing regulatory framework or have the funding to move forward with construction.

The Program aligns well with OCWD's current groundwater recharge efforts, which include recharge facilities, diversion facilities and injection wells. We look forward to public review of the City's Stormwater Credit Program and the program coming to fruition as it provides an innovative solution that will contribute to meeting the region's water demands for generations to come.

Greg Woodside

Greg Woodside, P.G., C.H.G.
Executive Director of Planning and Natural Resources



Orange County Water District
18700 Ward Street, Fountain Valley, CA 92708

tel: (714) 378-3275
fax:
email: gwoodside@ocwd.com



Orange County Sanitation District



10844 Ellis Avenue
Fountain Valley, CA 92708
714.962.2411
www.ocsan.gov

March 15, 2022

Jayne Joy
Executive Officer
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

Sent Via Email To: Jayne.Joy@waterboards.ca.gov

Re: Support for the City of Anaheim's Stormwater Credit Program

Dear Ms. Joy:

The Orange County Sanitation District (OC San) provides wastewater collection, treatment, and disposal services for approximately 2.6 million people in central and northwest Orange County. Our mission is to protect public health and the environment by providing effective wastewater collection, treatment, and recycling.

OC San has a long history of promoting regional infrastructure solutions to deliver on our mission. We are dedicated to inter-agency coordination with our partners throughout Orange County who manage stormwater, potable water facilities and the groundwater basin.

OC San is aware of the City of Anaheim's initiative to develop and fund stormwater collection and infiltration facilities and we are supportive of the overall concept and program. The City's commitment to managing and maintaining the regional facilities, coupled with an innovative approach to long-term funding is a model that we believe is promising and is worth investigating further.

Thank you for considering OC San's support for this program. Please contact Jennifer Cabral, Administration Manager at (714) 593-7581 or via mail at JCabral@ocsan.gov should you have any questions.

Sincerely,

James D. Herberg
General Manager

cc: Commentletters@waterboards.ca.gov
Klinker@Anaheim.net
MRcupero@Recupero.net
Michelle.Beckwith@waterboards.ca.gov

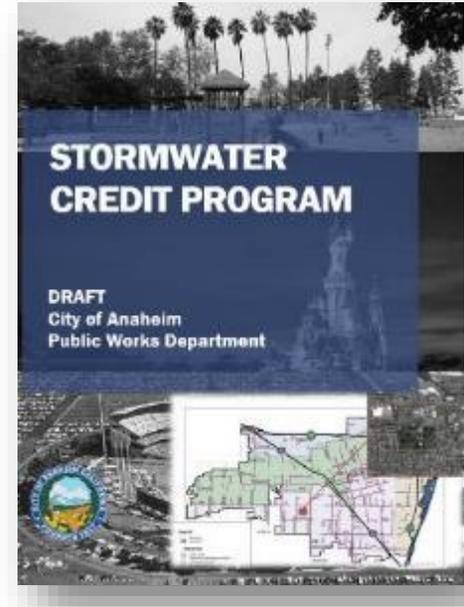
Our Mission: To protect public health and the environment by providing effective wastewater collection, treatment, and recycling.

Serving:
Anaheim
Brea
Buena Park
Cypress
Fountain Valley
Fullerton
Garden Grove
Huntington Beach
Irvine
La Habra
La Palma
Los Alamitos
Newport Beach
Orange
Placentia
Santa Ana
Seal Beach
Stanton
Tustin
Villa Park
County of Orange
Costa Mesa Sanitary District
Midway City Sanitary District
Irvine Ranch Water District
Yorba Linda Water District



City's Credit Program Development

- 2017 - 2019 - Internal Stakeholder (City Departments) Meetings, Review, Input
- 2019 - 2020 - External Outreach to Solicit Review/Comments/Support
 - County
 - OCWD (Letter of Support)
 - Orange County Coastkeeper (Letter of Support)
 - Other Environmental Groups (Coastkeeper Alliance, NRDC)
 - NPDES Technical Advisory Committee/Co-Permittees
 - BIA/CICWQ (Letter of Support)
- RWQCB Outreach, Meetings, Addressing Questions
 - July 2020 - Initial meeting/provided draft documents
 - August – October 2020 - Follow-up coordination/addressed RWQCB questions and comments
 - December 2020 - Additional questions/information request from RWQCB
 - January 2021 – Meeting/presentation to RWQCB to address questions
 - March 2021 – City provided letter addressing additional questions from January meeting
 - October - November 2021 - Re-engage with RWQCB on the Draft Credit Program
 - December 2021 – City provided letter addressing questions from November 2021 Meeting
- RWQCB Executive Officer Approval



Questions?



Thank You



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