



CITY OF GARDEN GROVE PUBLIC WORKS

April 12, 2016



Bao Nguyen
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Mayor Pro Tem

Christopher V. Phan
Council Member

Phat Bui
Council Member

Kris Beard
Council Member

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Subject: New Urban Supplier Conservation Standards

The City of Garden Grove (Garden Grove) appreciates the opportunity to submit this letter for consideration by the State Water Resources Control Board regarding the New Urban Supplier Conservation Standards.

Due to the deadline passing, Garden Grove respectfully requests the reconsideration of our submission for New, Local, Drought-Resilient Supply Credit. As a water supplier within the Orange County Water District (OCWD), Garden Grove is requesting credit for the Ground Water Replenishment System Initial Expansion Project (GWSIE). Attached is the letter from OCWD providing the required data and background information on the GWSIE.

Thank you for your consideration of our submission. Garden Grove continues to appreciate the significant attention the State Water Board staff has been giving the Emergency Conservation Regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'William E. Murray'.

William E. Murray, P.E.
Public Works Director/Water Services Manager

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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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General Manager
MICHAEL R. MARKUS, P.E., D.WRE

February 19, 2016

California State Water Resources Control Board
PO Box 100
Sacramento CA 95812-0010

SUBJECT: STATE WATER RESOURCES CONTROL BOARD EXTENDED EMERGENCY DROUGHT REGULATIONS CERTIFICATION OF NEW LOCAL DROUGHT-RESISTANT SUPPLY

Dear State Board staff:

Orange County Water District (OCWD) is providing this information to allow the nineteen retail water agencies ("Suppliers") within our service area to obtain the State Water Resources Control Board Emergency Drought Regulation New Local Drought-Resilient Supply Credit. This credit will assist our 19 Suppliers in meeting the water conservation goals established by the State Board under the recently extended emergency drought regulations.

The Groundwater Replenishment System (GWRS) began operation in March 2008 creating 72,000 acre-feet per year of new water supply. The GWRS purifies secondary treated wastewater from the Orange County Sanitation District that would otherwise be pumped to the Pacific Ocean. The GWRS water is recharged into the Orange County groundwater basin and supports higher annual groundwater production by our nineteen Suppliers. These Suppliers pay a Replenishment Assessment to OCWD for each acre-foot of groundwater produced which funds the operation of the GWRS.

In May 2015 the GWRS Initial Expansion Project (GWSIE) began operations creating an additional 31,000 acre-feet per year of local water supply. The total plant output is now 103,000 acre-feet per year. Per the extended SWRCB regulations, this 31,000 acre-feet per year of new water supply qualifies for the new local drought-resistant supply credit.

The attached table shows the nineteen Suppliers within the OCWD service area that should receive the credit. Our calculations indicate that an estimated 7.2% credit should be received assuming the full 31,000 acre-feet of production occurs from the GWSIE Project. It is OCWD's understanding that the credit will take effect March 1, 2016 and run through October 2016. OCWD will send a certification to the State Board the first week of November 2016

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documenting the exact amount of water created by the GWRSIE to allow for an exact credit calculation. OCWD will be pleased to provide any other additional documentation the State Board may require towards the administration of this credit.

Please contact Adam Hutchinson in our office at (714) 378-3214 or AHutchinson@OCWD.com should you have any questions or require additional information.



Michael Markus
General Manager
Orange County Water District

CC: Nineteen OCWD retail water agencies - Suppliers

Suppliers	CY 2013 Potable Water Demands (gallons)	GWRSIE Credit (gallons)	GWRSIE Credit (%)	Old Goal	New Goal
Anaheim City of	21,682,121,747	1,562,806,534	7.2%	20%	12.8%
Buena Park City of	5,005,396,335	360,779,549	7.2%	20%	12.8%
East Orange County Water District	328,294,825	23,662,873	7.2%	36%	28.8%
Fountain Valley City of	3,265,518,484	235,372,427	7.2%	20%	12.8%
Fullerton City of	9,592,035,107	691,375,840	7.2%	28%	20.8%
Garden Grove City of	8,646,682,868	623,236,630	7.2%	20%	12.8%
Golden State Water Company Cowan Heights	939,526,024	67,719,268	7.2%	36%	28.8%
Golden State Water Company Placentia	2,488,034,875	179,332,872	7.2%	24%	16.8%
Golden State Water Company West Orange	5,349,690,442	385,595,620	7.2%	16%	8.8%
Huntington Beach City of	9,963,674,624	718,162,917	7.2%	20%	12.8%
Irvine Ranch Water District	20,430,300,179	1,472,577,591	7.2%	16%	8.8%
La Palma City of	721,854,336	52,029,902	7.2%	20%	12.8%
Mesa Water District	6,005,302,539	432,850,906	7.2%	20%	12.8%
Newport Beach City of	5,347,314,988	385,424,402	7.2%	28%	20.8%
Orange City of	10,329,963,670	744,564,342	7.2%	28%	20.8%
Santa Ana City of **	12,891,738,613	929,212,259	7.2%	12%	4.8%
Seal Beach City of **	1,206,479,409	86,960,765	7.2%	8%	0.8%
Serrano Water District	1,095,413,115	78,955,316	7.2%	36%	28.8%
Tustin City of	3,981,800,768	287,000,706	7.2%	28%	20.8%
Westminster City of	4,071,116,512	293,438,417	7.2%	20%	12.8%
Yorba Linda Water District	6,802,620,695	490,320,098	7.2%	36%	28.8%
Total	140,144,880,156	10,101,379,233			

** Adjustment required as credit lowers conservation requirement below 8% minimum.

New, Local, Drought-Resilient Supply Certification Form

Certification of New, Local, Drought-Resilient Supply

The emergency regulation for urban water conservation adopted by the State Water Board on February 2, 2016 provides urban water suppliers with the option of submitting information on new, local, drought-resilient water supplies to reduce a water supplier's conservation standard. Supporting documentation must be provided by March 15, 2016 to qualify for the new, local, drought resilient water supply credit. Late submittals will not be reviewed. The State Water Board will use data and supporting documentation reported by the supplier to calculate the adjustment. See the Fact Sheet: [Submitting Information to Adjust a Supplier's Conservation Standard](#) an example of how the State Water Board calculates the adjustment.

Requirements:

The supplier has to obtain at least one percent of its total potable water production from a qualifying new local, drought-resilient water supply, developed after 2013.

The supplier must demonstrate that the use of the new local, drought-resilient supply does not reduce water available to another legal user of water or the environment (e.g., indirect potable reuse of wastewater in coastal regions where the water would not have otherwise been discharged into a water body that others use as a source of supply).

Where a supplier financially invests in a shared new, local, drought-resilient source of supply but does not actually receive water from that source--instead freeing that water up for another supplier to use--the agency that does not actually receive the water may also be eligible for this credit. In no case will the total amount of credits exceed what would have been available had all suppliers received credit only for water actually received.

What to submit: To qualify for the drought-resilient source credit an urban water supplier shall:

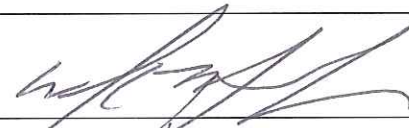
- a. Report the total annual potable water production from a local, drought-resilient source of supply (developed after January 1, 2013), in gallons;
- b. Submit this certification form that is signed by the supplier's General Manager or equivalent, with supporting documents that verify the following:
 - i. A description of the local, drought-resilient source of supply, e.g., how water is produced, the owner of the facility. If the supplier is not receiving water directly from the facility, but is applying based on being an investor, provide evidence of the amount and portion of the investment being made by the supplier, relative to the whole project.
 - ii. Total amount of water supplied in gallons. This amount must be pro-rated as a percent of the total production of the source/facility if there is more than one supplier using the same source/facility. The pro-rated portions of all suppliers claiming adjustments for a single source/facility may not add up to more than 100 percent.
 - iii. The date the water supply started providing water to suppliers and became an operational facility.
 - iv. Evidence that the use of that supply does not reduce the water available to another legal user of water or the environment
 - v. Completed certification for signed by the General Manager, or equivalent, that certifies information submitted is accurate (back side of this document)
- c. Prepare and submit this information by **March 15, 2016** at this weblink: drinc.ca.gov/dnn/Applications/PublicWaterSystems/ConservationStandardAdjustment.aspx

New, Local, Drought-Resilient Certification Form

I hereby certify that: Garden Grove City of

1. I will oversee, review, and take full responsibility for the completeness and accuracy of all data submitted to the State Water Resources Control Board as part of the reporting required pursuant to California Code of Regulations, title 23, section 865, subdivisions (f)(3) (I) and (J);
2. I have the authority to make the aforesaid certifications on behalf of Garden Grove City of

I acknowledge that submitting any information pursuant to California Code of Regulations, title 23, section 865, subdivision (f)(3) (I) and (J), including this certification, that is found to be materially false by the State Water Resources Control Board is a violation of that section, punishable by civil liability of up to five hundred dollars (\$500) for each day in which the violation occurs. Every day that the error goes uncorrected constitutes a separate violation. Civil liability for the violation is in addition to, and does not supersede or limit, any other remedies, civil or criminal.

Printed Name	William E. Murray
Title <i>(General Manager or equivalent)</i>	Public Works Director/Water Services Manager
Signature	
Date	4/12/2016
Email Address	wem@ci.garden-grove.ca.us

Please print, sign and submit completed form and upload the form to this weblink: <http://drinc.ca.gov/dnn/Applications/PublicWaterSystems/ConservationStandardAdjustment.aspx>