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## North Coast Regional Water Quality Control Board

March 1, 2022

Ms. Jennifer Burke  
Santa Rosa Water  
69 Stony Circle  
Santa Rosa, CA 95401  
[jburke@srcity.org](mailto:jburke@srcity.org)

Dear Ms. Burke:

**Subject:** Phosphorus Generating Project Eligibility and Nutrient Offset Program Credit Transfer Response Letter

**File:** City of Santa Rosa, Santa Rosa Regional Water Reuse System, Laguna Treatment Plant, WDID No. 1B83099OSON, NPDES Permit No. CA0022764 Place ID CW-255703

Regional Water Board staff (Staff) has reviewed the City of Santa Rosa's 2021 Total Phosphorus Effluent Limitation Compliance Report and Credit Transfer Request submitted on June 30, 2021. We concur with the City of Santa Rosa (Permittee or City) that a surplus of 9,874 pounds of controlled phosphorus remained available at the end of the 2020/2021 discharge season. This surplus of controlled phosphorus generated under the Nutrient Offset Program is eligible to transfer to the Water Quality Trading Framework. Furthermore, Staff concur that those projects identified in the City's request shall be considered eligible under the WQTF and may continue to generate phosphorus credits for the duration of their remaining project life, per Section 3.2.5 of the WQTF.

The Beretta Dairy Best Management Practices Nutrient Offset Project (Beretta Dairy) was developed and approved as part of the Nutrient Offset Program and remains eligible to continue to generate phosphorus credits under the terms under which the project was originally approved. A credit banking period of three years, the minimum allowed banking period under the WQTF, shall be assigned to credits generated by the Beretta Dairy project as it neither provides enhanced environmental value nor is placed on permanently protected lands.

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GREGORY A. GIUSTI , CHAIR | MATTHIAS ST. JOHN, EXECUTIVE OFFICER

The Pepperwood Preserve Sediment Reduction Project (Pepperwood) was developed and approved as part of the Nutrient Offset Program and also remains eligible to continue to generate credits under the terms under which the project was originally approved. The credit banking period for those credits generated under this project shall be equal to the project life of this project (30 years). As the Pepperwood project provides enhanced environmental value and is placed on permanently protected lands, the Permittee may submit a revised Credit Project Plan under the terms of the WQTF for consideration as a Permanently Protected Environmental Enhancement Project that may receive phosphorus credits that do not expire.

The Laguna de Santa Rosa Reaches 1 and 2 Project (Laguna 1&2) was developed and approved under the NOP and also remains eligible to continue to generate credits under the terms under which the project was originally approved. The credit banking period for those credits generated through direct removal of phosphorus laden sediment shall be equal to the approved project life for these practices, as approved within the Laguna 1&2 project (3 years). The credit banking period for those credits generated through reduced water column contact with phosphorus laden sediment shall be equal to the approved project life for this practice, as approved within the Laguna 1&2 project (10 years). As the Laguna 1&2 project provides enhanced environmental value and is placed on permanently protected lands, the Permittee may submit a revised Credit Project Plan for consideration as a Permanently Protected Environmental Enhancement Project that may receive phosphorus credits that do not expire.

The Permittee identified that under the terms of the Nutrient Offset Program, they ended the 2020/2021 discharge season with a surplus of 9,874 pounds of phosphorus. This was determined by calculating the available 3-year total mass of phosphorus that was controlled through phosphorus credit generating projects (12,169 pounds) and subtracting the 3-year average mass of phosphorus discharged to the Laguna de Santa Rosa (2,295 pounds). Staff concurs that the surplus 9,874 pounds of controlled phosphorus may be transferred to the WQTF as 9,874 phosphorus credits. As requested by the Permittee, these phosphorous credits shall be assigned to the Laguna 1&2 credit generating project as shown below:

**Table 1 – Summary of Credit Transfer Assignment**

<b>Credit Generating Project</b>	<b>Credit Owner</b>	<b>Approved Project Life</b>	<b>Verification Date</b>	<b>Certification Date</b>	<b>Retirement Date</b>	<b>Credit Status</b>	<b>Credit Balance</b>
Laguna 1&2: Reach 1 Sediment removal	City of Santa Rosa	3 Years	07/01/2020	02/04/2022	07/01/2022	Active	3,020
Laguna 1&2: Reach 1 Sediment removal	City of Santa Rosa	3 Years	06/30/2021	02/04/2022	07/01/2023	Active	3,020
Laguna 1&2: Reach 2 Sediment Removal	City of Santa Rosa	3 Years	07/01/2020	02/04/2022	07/01/2022	Active	1,848
Laguna 1&2: Reach 2 Sediment Removal	City of Santa Rosa	3 Years	06/30/2021	02/04/2022	07/01/2023	Active	1,894
Laguna 1&2: Reduced Water Column Contact with Sediment	City of Santa Rosa	10 Years	06/30/2021	02/04/2022	07/01/2030	Active	92
Total Available Credits:	---	---	---	---	---	---	9,874
<p>Table Notes:</p> <ol style="list-style-type: none"> <li>The retirement date indicates the due date of the Discharge Season Annual Report that active credits may be designated for use in, prior to their retirement.</li> </ol>							

If you have any questions, please contact Matthew Herman of my staff, at [matthew.herman@waterboards.ca.gov](mailto:matthew.herman@waterboards.ca.gov) or (707) 576-2683.

Sincerely,

Matthias St. John  
Executive Officer

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cc: Sean McNeil, Santa Rosa Water, [smcneil@srcity.org](mailto:smcneil@srcity.org)

Heather Johnson, Santa Rosa Water, [hjohnson@srcity.org](mailto:hjohnson@srcity.org)

Sunny Elliott U.S. EPA, Region 9, NPDES Permits Section (WTR-2-3),  
[Elliott.Sunny@epa.gov](mailto:Elliott.Sunny@epa.gov)