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## North Coast Regional Water Quality Control Board

August 19, 2014

Mr. David Guhin  
Santa Rosa Utilities Department  
4300 Llano Road  
Santa Rosa, CA 95407  
[dguhin@srcity.org](mailto:dguhin@srcity.org)

Dear Mr. Guhin:

Subject: Approval of Amendment to City of Santa Rosa Offset Credit Proposal for Nunes-Ocean View Dairy

File: Santa Rosa Subregional Water Reclamation System (Nutrient Offset Program)

On October 30, 2012, the City of Santa Rosa submitted a proposal for activities associated with the Nunes Ocean View Dairy Nutrient Offset Proposal (Project). The Project is located adjacent to Windsor Creek, approximately 0.75 miles upstream of the confluence of Windsor Creek and the Laguna de Santa Rosa. The Project proposed specific actions to eliminate nutrient runoff from the Nunes Ocean View Dairy to Windsor Creek, a tributary of the Laguna de Santa Rosa. After review of the Project for compliance with requirements of Resolution No. R1-2008-0061, the Notice of Approval, Nutrient Reduction Activities for the Nunes Ocean View Dairy Nutrient Offset Project was issued to the City of Santa Rosa on January 24, 2014 (January 24<sup>th</sup> NOA).

The City was unable to implement the Project as previously approved because the property transferred to a new owner who is converting the property from a dairy to a vineyard. This transition has already included implementation of two out of the three best management practices (BMPs) proposed for nutrient offset in the original Project proposal.

The January 24<sup>th</sup> NOA requires that *“Any change to the operation of the Project that would have a significant or material effect on the findings, conclusions, or conditions of this Notice of Approval must be submitted to the Executive Officer of the Regional Water Board for prior review and written approval”*. In compliance with the January 24<sup>th</sup> NOA, on August 5, 2014,

the City of Santa Rosa submitted the *Amendment to City of Santa Rosa Approved Offset Credit Proposal for Nunes-Ocean View Dairy BMPs* (Amended Project) reflecting changes to the Project BMPs.

Regional Water Board staff completed review of the Amended Project and find that revisions to the Project remain consistent with requirements of Resolution No. R1-2008-0061, result in reduction of nutrient loads to the Laguna de Santa Rosa, and are eligible for nutrient reduction credits applicable to discharges from the City of Santa Rosa Subregional Water Reclamation System.

The projected nutrient offset credits and eligibility periods applicable to the Amended Project are as follows:

Approved Crediting Option	BMP Elements	Adjusted Annual Credits (lbs P/yr)	Approved BMP Eligibility Period	Total Credits (lbs P)
Empty and manage manure lagoons	Agitation and pumping of liquid slurry, removal of solids, stacking/drying and transport to and offsite composting facility. Interim containment of stacked solids using BMPs	5,630	4 years	22,521

Please incorporate additional sample collection and nutrient analysis during the manure removal process to confirm crediting calculations. Final crediting calculations shall be presented in the Amended Project Verification Report.

We look forward to implementation of the Amended Project at your earliest opportunity. If you have any questions, you may contact Lisa Bernard at (707) 576-2677 or by email at [Lisa.Bernard@waterboards.ca.gov](mailto:Lisa.Bernard@waterboards.ca.gov).

Sincerely,

Original Signed By Fred Blatt For

Matthias St. John  
Executive Officer

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cc: Rita Miller, Santa Rosa Utilities Department, [RMiller@srcity.org](mailto:RMiller@srcity.org)  
Dave Smith, Merritt Smith Consulting, [davesmith@merritt-smith.com](mailto:davesmith@merritt-smith.com)