



June 29, 2017

Matthias St. John, Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd, suite A
Santa Rosa, CA 95403

RE: City of Santa Rosa Subregional Water Reclamation System NPDES Permit No. CA0022764, WDID No. 1B830990SON, Order No. R1-2013-0001

Subject: 2017 Total Phosphorus Effluent Limitation Compliance Report

Dear Mr. St. John:

This report documents compliance with Final Effluent Limit IV.A.2.b.i (no net loading of total phosphorus) as required Compliance Determination VII.N specified in Order R1-2013-0001, which specifies the following:

- The Permittee will be determined to be in compliance with the effluent limitation in IV.A.2.b.i if the total phosphorus controlled for the previous three years is greater than or equal to the three-year average of total phosphorus discharged; and
- The Permittee shall document compliance with the effluent limitations in an annual report, submitted to the Regional Water Board by July 1st of each year.

In addition, Attachment B of Order No. R1-2013-0048 specifies that “[t]he first compliance determination will occur in 2017, after conclusion of the 2016-2017 discharge season, using a three-year average from the 2014-2015 discharge season through the 2016-2017 discharge season.”

This report follows reports submitted in previous years to establish a reporting framework but which did not evaluate compliance. This report provides the first such compliance determination. This report also provides information specified in the February 2016 Settlement Agreement and Mutual Release of Claims (Agreement) related to a legal action brought by California River Watch against the City of Santa Rosa. The specified information and additional background are provided in Attachment 1.

Table 1 summarizes credits approved by RWQCB for three projects. Credits for the Beretta project were approved by RWQCB on September 20, 2012 based on the City’s June 5, 2012

proposal. Credits for the Pepperwood project were approved by RWQCB on October 18, 2012 based on the City's June 28, 2012 proposal. Credits for the Ocean View project were approved by RWQCB on April 29, 2015 based on the City's February 5, 2015 proposal.

Table 1 also describes the credits that have been earned as validated by the Sonoma Resource Conservation District as documented in a separate report for the Beretta and Pepperwood projects, which require annual monitoring to verify credits resulting from ongoing management practices (see Attachments 2 and 3). Monitoring of the Ocean View project was completed in 2015 and submitted with the 2015 Total Phosphorus Effluent Limitation Compliance Report dated July 1, 2015.

Table 1. Earned Phosphorus Annual Credit Summary (pounds)

	Approved ¹				Validated ²				3-Year Cumulative Total ³
	Beretta	Pepper-wood	Ocean View	Total	Beretta	Pepper-wood	Ocean View	Total	
2013	294	526		820	0	543.3		543	--
2014	485	526	5,836	6,847	294	543.3	5,483	6320	--
2015	442	526	5,836	6,804	498	542.8	5,483	6524	13,387
2016	399	526	5,836	6,761	485	542.3	5,483	6510	19,354
2017	399	341	5,836	6,576					13,034
2018	399	341		740					6,510

¹ Approved by RWQCB based on City's proposal.

² Validation is based on third party inspection. Validated credits are used to determine compliance. Validation reports can be found in attachments to this report.

³ Validated credit total updated each year based on annual credit verification reports.

Table 2 summarizes discharge of phosphorus. No discharge occurred in the 2013-2014 or 2014-2015 discharge seasons (i.e., October 1 – May 14). Discharge occurred on March 17, 2016 for the purpose of conducting a RWQCB-required verification of the model used to calculate allowable discharge to Santa Rosa Creek. The large discharge volume in 2016-17 reflects the impact of the extremely high rainfall that occurred.

Table 2. Total Phosphorus Discharged to Laguna de Santa Rosa (pounds)

Discharge Period	Discharge Volume (MG)	Total P ¹ (mg/l)	TP Discharged (pounds)	3-Yr Cumulative Total P Discharged (pounds)
2013-2014	0	2.7	0	--
2014-2015	0	3.6	0	--
2015-2016	4.9	2.8	114	114
2016-2017	1228	1.5	15,438	15,553

¹ as measured in Delta Pond during discharge season in 2013-2014 and 2016-17, and in plant effluent in 2014-2015. Discharge in 2016-17 occurred on multiple days from Delta Pond and Meadowlane D Pond, and 1.5 mg/L reflects the flow-weighted average concentration.

Table 3 compares the validated credits from Table 1 to the discharged quantity of Total Phosphorus from Table 2. Compliance is determined per Attachment B of Order No. R1-2013-0048 by comparing the three-year total validated credits to discharged phosphorus expressed in pounds. The positive value in the *Balance* of Table 3 column indicates compliance.

Table 3. Total Phosphorus Effluent Limitation Compliance Summary

Discharge Period	3-Yr Cumulative Total P Credits Earned ¹	3-Yr Cumulative Discharged Total P ²	Balance ³
2013-2014	0	--	--
2014-2015	0	--	--
2015-2016	13,387	114	13,273
2016-2017	19,354	15,553	3,802

¹ From Table 1. Credits earned in a calendar year are applied to the following discharge season. For example, credits earned in 2016 are applied to the 2016-2017 discharge season.

² From Table 2.

³ 2017 is the first year of compliance determination. Positive value in *Balance* column denotes compliance and negative value indicates non-compliance.

Matthias St. John

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Should you have any questions or require additional information, please contact Rita Miller, Deputy Director of Environmental Services at 707 543-3879

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that significant penalties may be imposed for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Bennett Horenstein

Director of Santa Rosa Water

Attachments

1. Information Specified in the February 2016 Settlement Agreement and Mutual Release of Claims (Agreement) Related to Legal Action Brought by California River Watch Against the City of Santa Rosa
2. Credit Verification and Annual Monitoring and Reporting for Pepperwood Preserve Sediment Reduction Project – Letter from Sonoma Resource Conservation District dated June 27, 2017
3. Credit Verification and Annual Monitoring and Reporting for Beretta Dairy BMPs Nutrient Offset Project dated June 27, 2017