
North Coast Regional Water Quality Control Board

September 6, 2023

In the Matter of

Notice of Approval Colgan Creek Reaches 1 and 2, Water Quality Credit Trading Proposal

PROJECT DEVELOPER: Sonoma Water
PROJECT OWNER: City of Santa Rosa / Town of Windsor
RECEIVING WATER: Colgan Creek / Laguna de Santa Rosa
HYDROLOGIC AREA: 114.21 Laguna Hydrologic Subarea, 114.22 Santa Rosa Hydrologic Subarea, 114.23 Mark West Hydrologic Subarea
COUNTY: Sonoma County
FILE NAME: Santa Rosa Subregional Water Reclamation System and Windsor Wastewater Treatment Reclamation, and Disposal Facility

BY THE EXECUTIVE OFFICER:

1. The North Coast Regional Water Quality Control Board (Regional Water Board) approved the Water Quality Trading Framework (WQTF or Framework) in 2018 through Resolution No. R1-2018-0025. The WQTF was incorporated as Attachment I to the City of Santa Rosa's National Pollutant Discharge Elimination System (NPDES) permit, Order No. R1-2020-0012, and the Windsor Water District's NPDES permit, Order No. R1-2020-0010. The WQTF was further modified in 2021 to allow a classification of long-term, multi-benefit projects that will receive phosphorus credits that do not expire, per Amendment Orders No. R1-2021-0041 and R1-2021-0042.
2. In collaboration with the City of Santa Rosa (City) and the Town of Windsor (Town), Sonoma Water submitted a draft credit project plan titled *Colgan Creek Reaches 1 and 2, Water Quality Credit Trading Proposal Under the Water Quality Trading Framework for the Laguna de Santa Rosa Watershed* (Project Proposal) on May 3, 2023, for consideration under the WQTF. This project proposes to generate phosphorus credits by excavating legacy sediment and organic matter from Colgan Creek between Todd Road and Llano Road, approximately two miles northwest of the City of Rohnert Park, California.

HECTOR BEDOLLA, CHAIR | VALERIE QUINTO, EXECUTIVE OFFICER

Sonoma Water refined the Project Proposal in response to informal comments from Regional Water Board staff and submitted their final Project Proposal for consideration on July 20, 2023.

3. The Project Proposal underwent a 30-day public comment period from August 1 to August 31, 2023. Staff received no public comment letters during that time. Following review of the Project Proposal, Staff have determined that the project is consistent with the requirements of the WQTF.
4. Under Sonoma Water's Stream Maintenance Program (SMP), Sonoma Water implements stream maintenance projects within the corridor of engineered flood control channels in Sonoma County to provide flood control services and improve ecological function. Sonoma Water's SMP Manual¹ refers to the Project sites as the upper portion of Colgan 1 (between Llano Road and Walker Avenue) and Colgan 2 (East of Walker Avenue and up to Todd Road). The Project proposes voluntary actions to modify hydraulic conditions in Colgan Creek by excavating phosphorus laden sediment, creating a low-flow channel, and planting riparian vegetation.
5. Excavating phosphorus-laden sediment from the stream channel directly eliminates phosphorus from the system and produces other secondary benefits that improve streamflow and water quality.
6. In drier weather, the narrower, deeper low-flow channel will prevent water from spreading across the full width of the flood control channel, allowing water to flow more quickly over a smaller area. This will limit phosphorus dissolution from sediment into the water column, minimize *Ludwigia* and mosquito habitat, reduce the potential for sediment deposition, and create better habitat for native aquatic and riparian species. The Project also contains a revegetation and vegetation management component to generate a canopy of native tree and shrub species that provide riparian habitat and shade, reducing water temperature.
7. The Project reduces phosphorus loads within Colgan Creek, located within the Laguna de Santa Rosa watershed, and is eligible for water quality credits. The estimated phosphorus credits that will be generated from this project and eligibility period are as follows (Table 1):

¹ Sonoma Water's [SMP Manual is available here:](https://www.sonomawater.org/stream-maintenance-program)
(<https://www.sonomawater.org/stream-maintenance-program>)

Table 1. Phosphorus credit generating methods and amounts.

Approved Crediting Option	Method and Location	Approved Total Eligibility Period	Estimated Phosphorus Reduction	Estimated Total Credits for Eligibility Period
Legacy Sediment Removal	Direct removal of P-laden sediment from Colgan Creek, Reaches 1 and 2	10 years	12,150 lbs	8,100

8. Within the Project Proposal, Sonoma Water provided Staff with detailed estimates for the mass of phosphorus anticipated to be removed, based on bulk density and phosphorus concentration of samples collected from seven locations along Colgan 1 and Colgan 2 in May 2022 (Attachment A). Bulk density results ranged from 1.4 g/cm³ to 1.7 g/cm³, with an average of 1.6 g/cm³. Phosphorus concentration results ranged from 0.19 g/kg to 0.70 g/kg, with an average of 0.60 g/kg. Phosphorus credits awarded under this project will be based on the actual mass of phosphorus removed and verified, using as-built surveys or the number of truckloads of sediment removed from Colgan Creek.
9. Sonoma Water will transmit verified phosphorus removal measurements in the form of a Verification Report to Staff once available. Verification will be pursuant to the requirements of the approved Credit Project proposal. Staff will post the Verification Report on the Regional Board website.

Accordingly, based on an independent review of the record, the Regional Water Board Executive Officer approves the Colgan Creek Reaches 1 and 2 Water Quality Trading Proposal as eligible for water quality credits in accordance with the Water Quality Trading Framework, provided that the project complies with the following terms and conditions:

1. Except as may be modified by any preceding conditions, all actions subject to this approval are contingent on: (a) all proposed activities and actions to mitigate potential water quality impacts being completed in strict compliance with Sonoma Water's project description, and (b) compliance with all applicable requirements of the Basin Plan, and (c) compliance with all applicable permits, certifications, and orders issued by the Regional Water Board.
2. 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.

3. The Project meets the eligibility criteria of the Water Quality Trading Framework, as included in the City of Santa Rosa's and Town of Windsor's Waste Discharge Requirements, NPDES Permits, Order No. R1-2020-0012, as modified by Amendment Order R1-2021-0041, and Order No. R1-2020-0010, as modified by Amendment Order R1-2021-0042, respectively and, if constructed as described in Attachment A and in compliance with the above-listed conditions, the Project will adhere to applicable water quality standards. Therefore, the Project is eligible for water quality credits, as proposed.

Valerie Quinto
Executive Officer

Attachment A: Sonoma Water, Colgan Creek Reaches 1 and 2, Water Quality Credit Trading Proposal

cc: Sean McNeail, Santa Rosa Utilities Department, smcneil@srcity.org
Michael Thompson, Sonoma Water, Michael.Thompson@scwa.ca.gov
Veronica Siwy, Town of Windsor, vsowy@townofwindsor.com

ATTACHMENT A

Sonoma Water, Colgan Creek Reaches 1 and 2 Water Quality Credit Trading Proposal

The Colgan Creek Reaches 1 and 2, Water Quality Credit Trading Proposal prepared by Sonoma Water can be found online on the City of Santa Rosa's [Nutrient Offset Program Website](https://www.srcity.org/1124/Nutrient-Offset-Program) (<https://www.srcity.org/1124/Nutrient-Offset-Program>).