### Amendment of the Water Quality Trading Framework for the Laguna de Santa Rosa Items No. 3 and 4 Order No. R1-2021-0041 and Order No. R1-2021-0042 Matthew Herman, NPDES Unit WRCE

December 2, 2021



# Overview

- The Laguna de Santa Rosa
- Water Quality Trading Framework
- Amendment Orders
- Public Comments Received
- Recommendation



### Laguna de Santa Rosa Watershed

#### 303(d) Impairments:

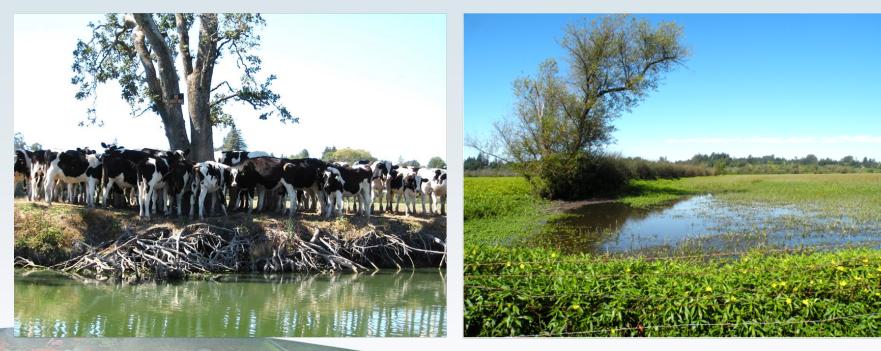
- Phosphorus
- Dissolved Oxygen
- Sediment
- Temperature
- Pathogens
- Mercury
- Aluminum
- Manganese



#### Restoring Health to the Laguna

#### Reduce Pollutant Sources

#### Increase Assimilative Capacity



#### Diet + Exercise!

# Water Quality Trading Framework

- First adopted as Resolution R1-2018-0025 on July 11, 2018.
- Was established to be the method of compliance determination with the "no net loading" effluent limitation for Phosphorus in the Laguna de Santa Rosa.
- Provides a "Marketplace" for phosphorus credits to be generated, bought, sold, and used.

## Water Quality Trading Framework

- Currently implemented within the City of Santa Rosa's and Town of Windsor's NPDES Permits as the means of compliance determination for Phosphorus.
- Updated to include an expanded banking period policy that allowed credits generated under a project to be banked for a period equal for the duration of that project's life.

#### **Amendment Orders**

- The Proposed Amendment Orders establish a subset of multi-benefit projects that shall generate credits that do not expire.
- Other modifications, administrative changes, and new requirements have been included to better support the WQTF and the above change.

## **Public Comment**

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RRW

#### Written Response Received From:

- City of Santa Rosa
- Windsor Water District
- City of Cotati
- Russian River Watershed Association

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### **Public Comment**

#### **Additional Concerns:**

- Both the City of Santa Rosa and the Town of Windsor have requested to modify Section 2.3 of the WQTF so that this language cannot be mis-interpreted to imply that credits generated in a discharge season must be used in that same discharge season.
- The City of Santa Rosa requested confirmation that the suspension or cancellation of previously used credits that might result in a credit deficit, will only occur if the credits were used after the established date of material failure, as discussed in Section 8.3.1 of the WQTF.

# **Public Comment**

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#### Recommendation

# Adopt NPDES Orders No. R1-2021-0041 and R1-2021-0042 as proposed.

**Matthew Herman** 

Water Resource Control Engineer NPDES Wastewater and Storm Water Unit Matthew.Herman@waterboards.ca.gov