

# 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

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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



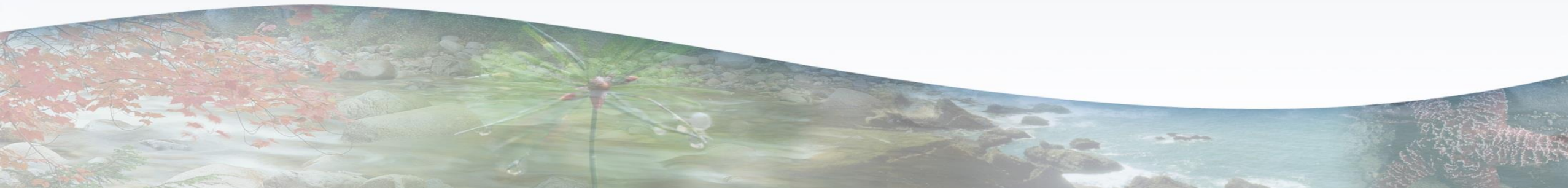
Diet

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Exercise!

# Water Quality Trading Framework

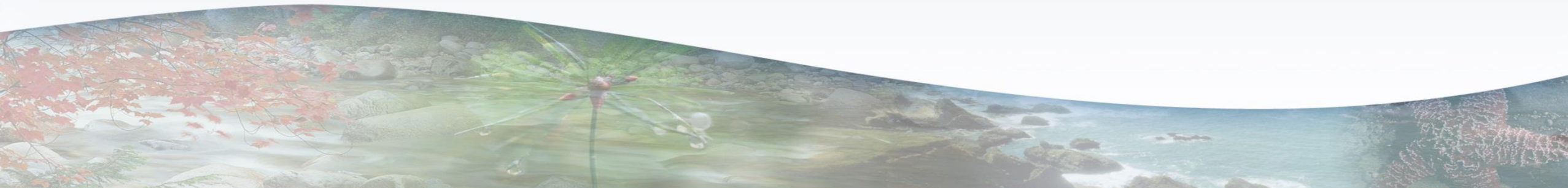
- First adopted as Resolution R1-2018-0025 on July 11, 2018.
- Was established to be the method of compliance determination with the “no net loading” effluent limitation for Phosphorus in the Laguna de Santa Rosa.
- Provides a “Marketplace” for phosphorus credits to be generated, bought, sold, and used.





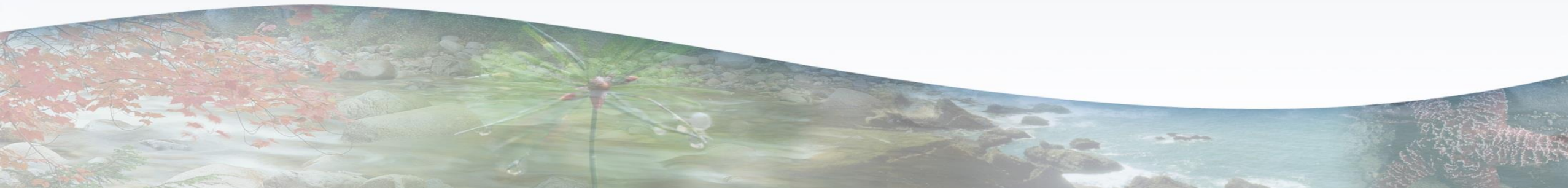
# Water Quality Trading Framework

- 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

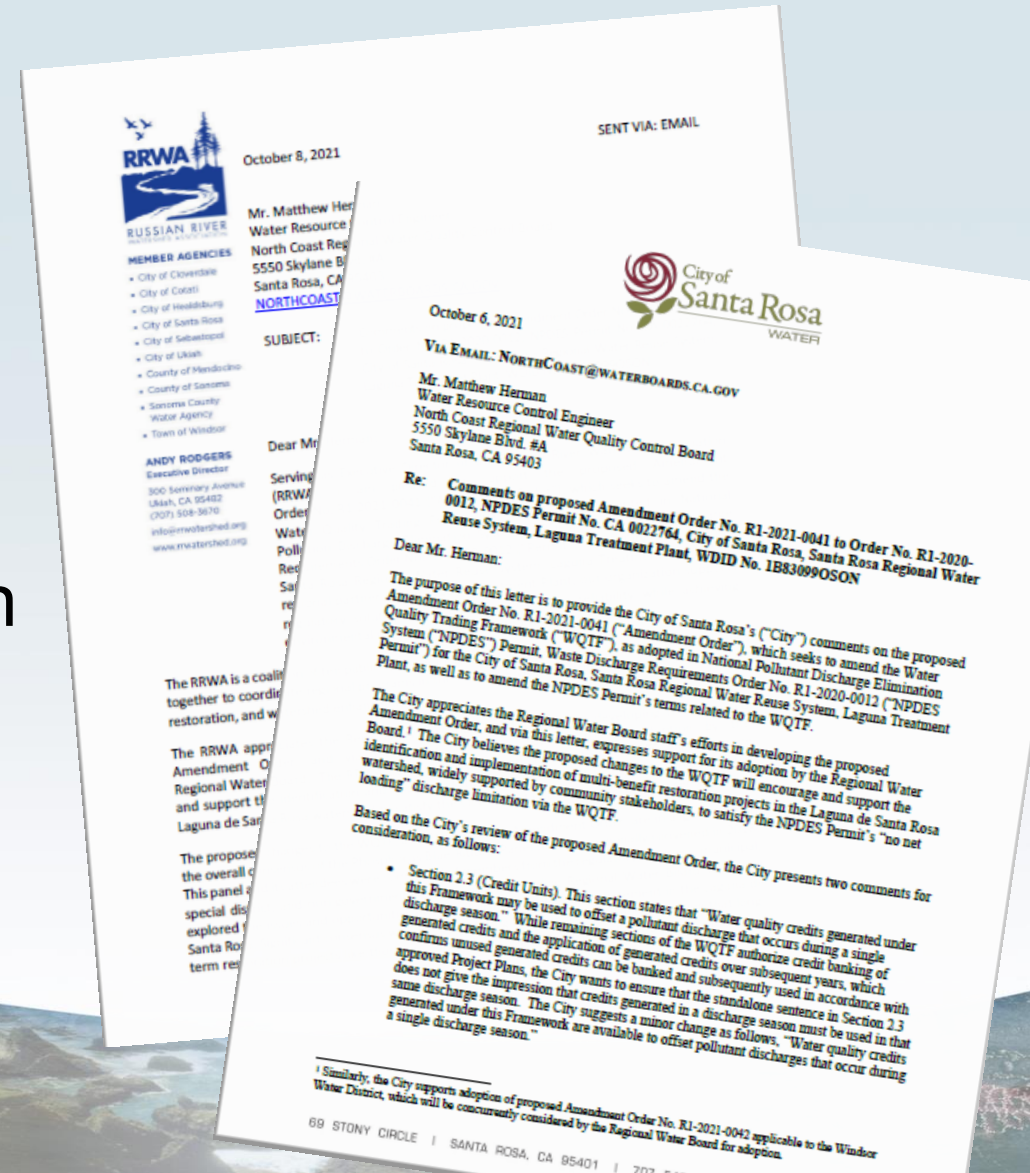
- The Proposed Amendment Orders establish a subset of multi-benefit projects that shall generate credits that do not expire.
- Other modifications, administrative changes, and new requirements have been included to better support the WQTF and the above change.



# Public Comment

## Written Response Received From:

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





# Public Comment

## **Additional Concerns:**

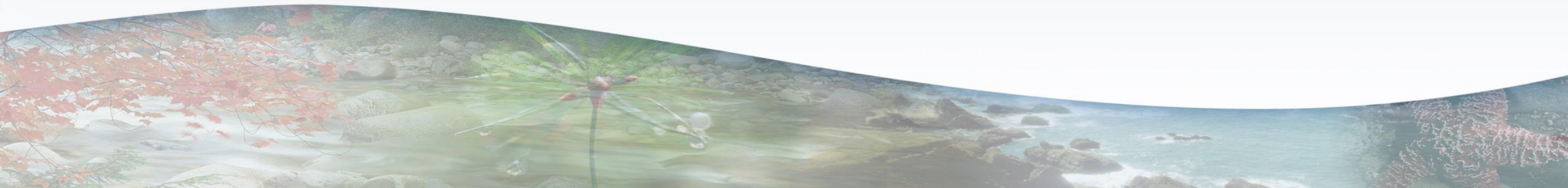
- Both the City of Santa Rosa and the Town of Windsor have requested to modify Section 2.3 of the WQTF so that this language cannot be mis-interpreted to imply that credits generated in a discharge season must be used in that same discharge season.
- The City of Santa Rosa requested confirmation that 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.

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