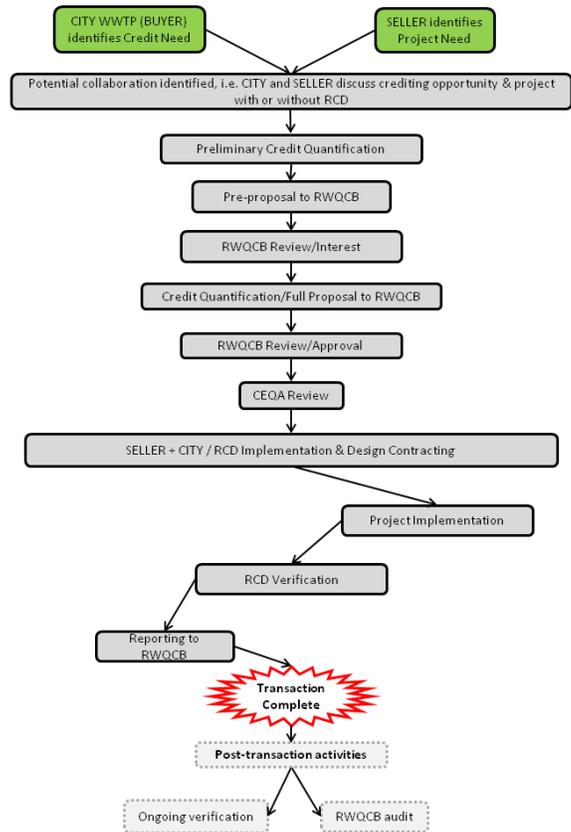


## Nutrient Offsets for City of Santa Rosa Discharges and Development of the First PS/NPS WQT Program in CA

The City of Santa Rosa’s Subregional Water Reclamation Facility (a publicly-owned treatment works--POTW) was required to fully offset its nutrient discharge to the nutrient-impaired Laguna de Santa Rosa per a 2008 “Offset Resolution” set forth by the North Coast Regional Water Quality Control Board. This Resolution stipulated no net loading of nutrients from the City’s treatment facility under their 2006 NPDES permit issued prior to a final Laguna TMDL. The POTW only seasonally discharges to the Laguna from one of several storage ponds during January to February, if at all. K&A successfully engaged the Regional Board in defining, quantifying and implementing a variety of non-point source conservation practices for offset credits.

There were no defined methodologies in CA to create offsets until K&A began assisting the City. Because this was a pre-TMDL condition, multiple watershed stakeholders desired to expand the offset program for the entire watershed. Working with local Resource Conservation Districts, K&A secured USDA funding to develop California’s first WQT program now being based on an “Aggregator” model structure for point and non-point source trading. Analyses included demand assessments for POTWs and urban stormwater (from this the 12th largest city in CA), and credit supply using empirical watershed loading models. K&A drafted and/or designed all facets of the WQT trading program through reviews by a Project Advisory Committee (technical and regulatory issues) and Stakeholder Advisory Committee (agricultural participation). The Regional Board adopted and integrated the principal elements of the trading framework into a revised Offset Resolution for the City. These will serve to memorialize the program for later adoption in the forthcoming TMDL.

K&A was also able to successfully engage the dairy community in these efforts through a new Dairy Waiver Discharge program. With early adopters,



dairies were able to be paid for necessary structural practices by the City whereby the City would receive short-term nutrient credits towards their net-zero discharge requirement. Other dairy upgrades that went beyond waiver requirements provided the City with longer-term credits. Road-stream crossing upgrades at higher elevation trout streams also generated credits for the City through K&A efforts to document project benefits.

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**Project Costs:**  
 \$450,000 (K&A)

**Project Duration:**  
 2010-2015