

California Regional Water Quality Control Board  
North Coast Region

RESOLUTION NO. R1-2008-0061  
Approving  
Santa Rosa Nutrient Offset Program  
for the

Santa Rosa Subregional Water Reclamation System

Sonoma County

**FINDINGS**

The California Regional Water Quality Control Board, North Coast Region, (hereinafter Regional Water Board) finds that:

1. The City of Santa Rosa owns and operates the Santa Rosa Subregional Water Reclamation System (the "Subregional System"), a publicly owned treatment works. The Subregional System seasonally discharges into the Laguna de Santa Rosa and its tributaries. The Laguna de Santa Rosa is 303(d) listed for, among other constituents, low dissolved oxygen, nitrogen, and phosphorus.
2. The Regional Water Board adopted a renewed National Pollutant Discharge Elimination System ("NPDES") Permit for the Subregional System, Order No. R1-2006-0045, CA0022764, ("Permit") on September 20, 2006.
3. The Permit imposed the following final effluent limitations for nitrogen and phosphorous based on the Water Quality Control Plan's narrative water quality objective for biostimulatory substances:

"The Regional Board plans to develop and adopt total maximum daily loads (TMDLs) for nitrogen and phosphorus which will specify wasteload allocations (WLAs) for point sources and load allocations (LA) for non-point sources, as appropriate. Following the adoption of these TMDLs by the Regional Water Board, this Order will be issued with final WQBELs based on applicable WLAs. Alternatively, in the absence of a TMDL, at the end of the compliance schedule authorized by this Order, the final effluent limitation for nitrogen and phosphorus will be zero, or no net loading."

See Permit at Effluent Limitations section IV.A.1.g.

4. Footnote 5 to Effluent Limitations section IV.A.1.g. states:  
"A 'no net loading' effluent limit may be met by: 1) reducing the effluent concentration below detectable levels through source control and/or treatment; 2) reducing loads through recycling/reclamation; and/or 3) reducing loads elsewhere in the watershed by an amount at least equal to the amount discharged (and of equivalent bioavailability) through an approved offset program."

5. Regional Water Board and City of Santa Rosa staff prepared the Santa Rosa Nutrient Offset Program, attached hereto as Attachment 1, to qualify as the offset program referenced in footnote 5 to Effluent Limitations section IV.A.1.g. that the City of Santa Rosa can implement to comply with Effluent Limitations section IV.A.1.g. of the Permit.
6. The City of Santa Rosa has undertaken significant steps to reduce nitrogen concentrations in its effluent and to reduce nutrient loading to the Laguna de Santa Rosa. Activities currently underway or completed include improvements to its activated sludge treatment process to achieve partial denitrification, increased water recycling, increased diversion of effluent to the Geysers Steamfields, and development and implementation of programs involving source control, water conservation, biosolids application management and storm water control. The Nutrient Offset Program will provide a framework for achieving additional nutrient load reductions during the interim period before the nutrient TMDL for the Laguna de Santa Rosa is implemented.
7. Regional Water Board staff recommends Regional Water Board approval of the Santa Rosa Nutrient Offset Program.

## **RESOLUTION**

THEREFORE, it is hereby resolved that:

1. The Regional Water Board approves the Santa Rosa Nutrient Offset Program, attached hereto as Attachment 1, as the approved offset program referenced in footnote 5 to Effluent Limitations section IV.A.1.g. of the Permit, that the City of Santa Rosa can implement to comply with Effluent Limitations section IV.A.1.g. of the Permit.

## **CERTIFICATION**

I, Catherine Kuhlman, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of a Resolution adopted by the California Regional Water Quality Control Board, North Coast Region, on July 24, 2008.

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Catherine Kuhlman  
Executive Officer