

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

STAFF REPORT FOR REGULAR MEETING OF JUNE 20-21, 2024

Prepared on June 6, 2024

ITEM NUMBER: 10

SUBJECT: **ENFORCEMENT REPORT AND ENFORCEMENT PROGRAM UPDATE**

STAFF CONTACT: Tamara Anderson, (805) 549-3334,
tamara.anderson@waterboards.ca.gov

ACTION: Informational

SUMMARY

This staff report summarizes recent Central Coast Water Board enforcement actions and provides an annual enforcement program update that includes a recommendation for maintaining the existing enforcement program priorities, a status update on completed and in progress projects funded by suspended administrative civil liabilities, a summary of a proposed resolution to authorize use of supplemental environmental project (SEP) funds for the Central Coast Drinking Water Well Testing Program, and a summary of complaints submitted to the California Environmental Protection Agency (CalEPA) complaint system.

ENFORCEMENT REPORT

Attachment 1 of this staff report includes the Enforcement Report consisting of Tables 1 through 5. Tables 1 through 4 summarize Central Coast Water Board enforcement actions issued from December 1, 2023 to March 31, 2024, and include final administrative civil liability (ACL) orders (Table 1), expedited payment program letters (Table 2), notices of non-compliance for industrial or construction stormwater general permit annual reporting or enrollment (Table 3), and notices of violation covering various Central Coast Water Board programs (Table 4).

Table 5 in Attachment 1 summarizes alleged violations reported in the California Integrated Water Quality System (CIWQS) and the Storm Water Multiple Application and Report Tracking System (SMARTS) from October 1, 2023 to January 31, 2024. Central Coast Water Board staff are currently reviewing the alleged violations that have not been addressed to assess priorities for potential future enforcement.

A general description of the different types of enforcement actions Central Coast Water Board staff may take or recommend are provided in Attachment 2. Abbreviations used throughout the Enforcement Report are defined in Attachment 3. More detailed descriptions of each type of enforcement action are provided in the State Water

Resources Control Board's (State Water Board) Water Quality Enforcement Policy ([Enforcement Policy](#)).¹

BACKGROUND FOR ENFORCEMENT PROGRAM UPDATE

The Central Coast Water Board enforcement team consists of Thea Tryon, Assistant Executive Officer; Tamara Anderson, Senior Water Resource Control Engineer Specialist; and Todd Stanley, Water Resource Control Engineer. Jesse Woodard, Associate Governmental Program Analyst in the Central Coast Water Board administrative program, assists the enforcement team in preparing the quarterly enforcement reports. Central Coast Water Board enforcement staff assist program staff with informal and formal enforcement; evaluate and prioritize violations to ensure compliance with state and federal laws, regulations, policies, plans, and permits; address mandatory enforcement obligations imposed by law; coordinate with other water board divisions and external agencies on enforcement actions and to improve enforcement consistency and effectiveness; and manage environmental complaints received through the CalEPA compliant system.

Enforcement is an important component of the State Water Board's and Regional Water Quality Control Boards' authority to encourage the regulated community to anticipate, identify, and correct violations and the Water Boards have a variety of enforcement tools to use in response to non-compliance by dischargers. The Central Coast Water Board follows a progressive enforcement approach and contemplates an escalating series of actions beginning with notification of violations and compliance assistance, followed by enforcement orders compelling compliance, and potentially a complaint for civil liabilities as appropriate and necessary. Central Coast Water Board enforcement staff follow the State Water Board's Enforcement Policy in making enforcement related decisions and to calculate penalty amounts as the Policy establishes an administrative civil liability assessment methodology to create a transparent, fair, and consistent statewide approach to assess liabilities.

For transparency and to keep the public and Central Coast Water Board members informed on enforcement program actions, Central Coast Water Board enforcement staff present multiple (approximately quarterly) enforcement reports to the Central Coast Water Board per year and provide annual updates on enforcement program priorities and completed and in progress projects funded by suspended administrative civil liabilities.

ENFORCEMENT PRIORITIES

The State Water Board's Enforcement Policy includes a request for Regional Water Quality Control Board enforcement staff to seek input on general region-specific enforcement priorities from members of the public and the Regional Water Quality Control Board members at a regularly noticed public meeting on an annual basis.

¹ State Water Board, 2017 Water Quality Enforcement Policy, effective October 5, 2017, https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/040417_9_final%20adopted%20policy.pdf.

Central Coast Water Board enforcement staff recommend keeping the same general enforcement priorities that have been in place since October 2021:²

- Address violations that pose an immediate and significant threat to water quality or result in significant detrimental impacts to human health and/or the environment.
- Prioritize violations associated with discharges that impact water quality in Underrepresented Communities.³
- Prioritize violations associated with discharges that result in drinking water supplies exceeding drinking water standards for individuals and/or small communities.
- Address violations involving falsification of information and non-compliant dischargers that realize a significant competitive economic advantage over compliant members of the regulated public.

Central Coast Water Board enforcement staff recommend keeping the same enforcement priorities because these priorities have been effective in informing which enforcement actions are actively pursued to ensure alignment with the Central Coast Water Board's current overall priorities and the enforcement priorities for discretionary enforcement actions outlined in the State Water Board's Enforcement Policy.

In general, Central Coast Water Board enforcement staff cannot predict what type, how many, or how complex the violations will be at any given time and there are typically many more violations and non-compliance issues that need to be addressed than there are enforcement resources available to address them. Therefore, Central Coast Water Board enforcement staff will use the general enforcement priorities described above to guide which discretionary enforcement actions⁴ to pursue and how best to assist program staff. The enforcement priorities are not in a particular order; however, Central Coast Water Board enforcement staff will typically prioritize violations associated with more than one enforcement priority. In addition to focusing the Central Coast Water Board's enforcement resources on violations that negatively impact Underrepresented Communities and drinking water supplies for individuals and/or small communities, enforcement staff are also evaluating how water quality impacts associated with climate change inform which enforcement actions to prioritize if corrective actions or mitigation plans are not reasonably implemented by dischargers.

It is Central Coast Water Board enforcement staff's overall goal to use the enforcement priorities to enhance the Water Boards' ability to focus and leverage its enforcement resources and to achieve the general deterrence needed to encourage the regulated

² State Water Board's and Regional Water Quality Control Boards' enforcement priorities are available at: https://www.waterboards.ca.gov/water_issues/programs/enforcement/priorities.html

³ Underrepresented Communities include, but are not limited to, Disadvantaged Communities (DACs), Severely Disadvantaged Communities (SDACs), Economically Distressed Areas (EDAs), Tribes, Environmentally Disadvantaged Communities (EnvDACs), and members of Fringe Communities.

⁴ Central Coast Water Board will continue to address mandatory enforcement obligations imposed by law (e.g., mandatory minimum penalties under California Water Code sections 13385 (h) & (i), minimum administrative civil liability under Water Code section 13399.33).

community to anticipate, identify, and correct potential non-compliance issues before they occur.

STATUS UPDATE ON PROJECTS FUNDED BY SUSPENDED ADMINISTRATIVE CIVIL LIABILITIES

Central Coast Water Board enforcement staff typically reach resolution of an ACL through settlement. As part of the settlement, the discharger can request a permanent suspension of a portion of the liability in lieu of submitting the full payment to the State Water Board's Cleanup and Abatement Account (CAA) or the Waste Discharge Permit Fund (WDPF) to satisfy the entire administrative liability amount as long as the discharger agrees to fund and carry out the supplemental environmental project (SEP), enhanced compliance action (ECA), or compliance project (CP) as described in the settlement agreement.⁵ The [State Water Board's Policy on Supplemental Environmental Projects](#) (SEP Policy)⁶ establishes a framework for the Water Boards to use in exercising their enforcement discretion to determine appropriate SEPs and ECAs during settlements and provides guidance for implementing SEPs and ECAs. The State Water Board's Enforcement Policy specifies conditions for which CPs may be considered as part of a settlement.

This section of the staff report summarizes the projects funded by suspended administrative civil liabilities that have been completed and are in progress between June 6, 2023 and June 6, 2024. During this timeframe, one SEP and two ECAs were completed, and one SEP and one CP are in-progress. For information on SEPs, ECAs, and CPs completed or in progress prior to June 2023, please refer to the [June 22-23, 2023 Enforcement Report](#).⁷

COMPLETED SEP and ECAs

Monterey Mushroom ACL Order R3-2020-0048: Community Water Center (CWC) 1,2,3-Trichloropropane (1,2,3-TCP) Treatment Systems SEP

On July 17, 2020, the Central Coast Water Board issued ACL Order R3-2020-0048 to Monterey Mushrooms, Inc. and Spawn Mate, Inc. for unauthorized discharges of process wastewater and polluted stormwater to an unnamed tributary of Elkhorn Slough, for a total liability amount of \$1,169,425. The settlement includes a third party-administered SEP that was performed by CWC for \$599,775 to conduct outreach and

⁵ A SEP is an environmentally beneficial project that a person subject to an enforcement action voluntarily agrees to undertake or fund through an appropriate third party. An ECA is a project that enables a discharger to make capital or operational improvements beyond those required by law, and are separate from projects designed to merely bring a discharger into compliance. A CP is a project designed to address problems related to the violation and bring the discharger back into compliance in a timely manner and can only be considered where they are expressly authorized by statute.

⁶ State Water Board, 2017 Policy on Supplemental Environmental Projects, Effective May 3, 2018, https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/seps/20180503_sep_policy_a.md.pdf

⁷ June 22-23, 2023 Central Coast Water Board meeting agenda: https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2023/jun/agenda-english.pdf

education and to implement a pilot project for the design, installation, maintenance, and monitoring of 1,2,3-TCP point of entry (POE) household-level water treatment systems for DAC households in unincorporated areas of northern Monterey County. This SEP was completed on November 30, 2023. For more detailed information about the project, see [CWC's final project report](#).⁸

For this SEP, CWC completed the following: 1) conducted outreach and education for potential candidate households for 1,2,3-TCP treatment systems and additional outreach for households that received treatment systems, 2) installed, maintained, and monitored 12 point of entry treatment systems, serving 16 households, with over 60 people, 3) convened a technical advisory committee with technical and regulatory experts to inform the treatment system design and maintenance and 4) shared the project results and lessons learned.

The State Water Board's Division of Financial Assistance approved an approximately \$1.8 million grant to fund CWC to implement additional 1,2,3-TCP point of entry treatment systems and monitor, operate, and maintain the treatment systems installed through the SEP. Under this grant, CWC plans to continue to work with the technical advisory team convened under the SEP to continue to refine the 1,2,3-TCP treatment technology and operation and maintenance of the systems and to test various treatment options to disinfect residents' water to address bacteriological issues.

City of Salinas ACL Order R3-2023-0041: City of Salinas Sanitary Sewer System Flow Monitoring Project ECA 1 and City of Salinas Lift Station Control Upgrade Project ECA 2

On September 12, 2023, the Central Coast Water Board issued ACL Order R3-2023-0041 to the City of Salinas for unauthorized discharges of untreated wastewater from the City of Salinas' sanitary sewer system to Natividad Creek, for a total liability amount of \$193,879. The City of Salinas applied \$95,715 of the penalty to the following two ECAs to enhance the City's ability to help prevent future spills from the sanitary sewer collection system: 1) City of Salinas Sanitary Sewer System Flow Monitoring Project, and 2) City of Salinas Lift Station Control Upgrade Project.

On February 23, 2024, the City of Salinas completed the Sanitary Sewer System Flow Monitoring Project ECA. The Sanitary Sewer System Flow Monitoring Project ECA included the purchase and installation of new manhole covers with electronic sensors at eleven City-owned lift stations to measure real-time flow and levels of wastewater flowing through the sanitary sewer lines. The sensors in the manhole covers will send alarms to maintenance staff as an early warning if there are indicators of a potential spill. Four of the manhole covers are in DACs.

On March 28, 2024, the City of Salinas completed the Lift Station Control Upgrade Project ECA. The Lift Station Control Upgrade Project ECA included an upgrade to the existing monitoring and control systems and improved alarm capabilities to increase the

⁸ 1,2,3-TCP Treatment System SEP Final Project Report, Community Water Center website: <https://pentagon-seadragon-4dzb.squarespace.com/123-tcp>

reliability of the Lake Street Pump Station. The Lift Station Control Upgrade Project ECA directly relates to the alleged violation resolved in ACL Order R3-2023-004, because an electronic failure at the Lake Street Pump Station caused an overflow of untreated wastewater from two manholes in the sanitary sewer system, and some of the untreated wastewater discharged to Natividad Creek.

IN-PROGRESS SEP and CP

Monterey One Water ACL Order R3-2021-0051: Private Lateral Rehabilitation Project for the Castroville Community Services District SEP

On August 18, 2021, the Central Coast Water Board issued ACL Order R3-2021-0051 to Monterey One Water to resolve three violations for unauthorized discharges of untreated wastewater from Monterey One Water's wastewater treatment plant and sanitary sewer system to the Pacific Ocean, for a total administrative civil liability amount of \$800,000. Monterey One Water applied \$790,000 of the penalty to the Private Lateral Rehabilitation Project for the Castroville Community Services District SEP. This SEP consists of assessment and repair or replacement of privately-owned residential sewer laterals in poor condition within DAC areas in the Castroville Community Services District's service area and identifies 101 properties for inclusion in the project. The SEP is intended to improve the sanitary sewer system integrity to reduce the potential for rainwater entering and sewage exiting the system, thereby preventing sanitary sewer overflows and protecting local surface water and groundwater quality and public health.

Manhole and lateral video investigations – Monterey One Water completed the video investigations of the Castroville Community Services District's manholes in the project area and residential sewer laterals to evaluate conditions and possible defects. Prior to the investigative work, Monterey One Water notified property owners and residents via bilingual mailed flyers and door hangers and obtained right of entry permissions from property owners for sites where the contractor needed to access the lateral from the private property instead of entering the lateral from the public right of way. In total, Monterey One Water's contractor conducted 23 manhole and 101 lateral inspections.

Lateral rehabilitation – Monterey One Water analyzed the results of the video investigations and out of the 101 private laterals investigated, 43 laterals qualify for repair. Out of the 43 private laterals that meet the criteria of the program, 26 of the laterals are on owner-occupied properties. In alignment with the preferences shared by Central Coast Water Board members when the proposed ACL Order R3-2021-0051 was deliberated to only conduct lateral repairs and replacements at owner-occupied properties, Monterey One Water is prioritizing rehabilitation work on owner-occupied properties.

For the 26 owner-occupied properties, Monterey One Water conducted an enrollment process with outreach services and obtained the required property owner approvals to complete the rehabilitation process to repair and replace the entire length of homeowners' laterals for 21 of the 26 properties. For the other five properties, one

owner declined to participate and four were unresponsive after multiple contact attempts by mail, phone, and door-to-door outreach. In June 2023, Monterey One Water received bids to rehabilitate the laterals. The bids were higher than anticipated, so Monterey One Water rejected the bids, and implemented the project in phases. First, Monterey One Water initiated a pilot program and advertised four separate individual lateral rehabilitation projects with the goal of attracting more contractors, including smaller companies, to bid on each project to lower costs. On average, the bids came in 23 percent lower than the original bid process. Monterey One Water awarded the contracts to the lowest bid for each property, and the four lateral rehabilitation projects in the pilot program were completed. Based on the average cost per lateral rehabilitation, Monterey One Water forecasted it could rehabilitate 17 additional laterals with the SEP funds available. Therefore, Monterey One Water then implemented the second phase and advertised 17 separate individual lateral rehabilitation projects and selected the lowest bid for each property and those lateral rehabilitation projects are underway. As of May 30, 2024, 12 of the 17 laterals are complete.

The SEP also included an option to line manholes and replace manhole rings and covers. Monterey One Water's contractor inspected the manholes, and because all were in good condition, the manholes did not need repair. Monterey One Water plans to instead use those allocated funds for lateral repairs and replacements.

Property owner follow-up – Monterey One Water is preparing letters and resources to send to the owners of all 101 properties that were part of this SEP. For properties that did not have their laterals rehabilitated, Monterey One Water plans to share a copy of the sewer lateral condition assessment report and provide general information for sewer lateral maintenance. For properties that had their laterals rehabilitated, Monterey One Water plans to share a report summarizing the work conducted on the property and provide general information for sewer lateral maintenance.

Because of unknowns with construction costs, Monterey One Water estimated how many laterals it could rehabilitate in the second phase of the lateral rehabilitation construction. Now that the second phase is almost complete, Monterey One Water reassessed the SEP expenditures and estimates that Monterey One Water has approximately \$75,000 remaining SEP funds to support rehabilitation of additional laterals. Monterey One Water requested an extension to SEP interim milestone dates and to modify the final SEP completion deadline of August 12, 2024 to December 31, 2024 to provide more time in order to obtain right of entry agreements, solicit and award construction bids, and perform construction to rehabilitate approximately three or four additional laterals. On June 5, 2024, the Central Coast Water Board Executive Officer approved the requested extensions of SEP interim milestone dates and the project completion deadline.

Monterey One Water submits quarterly reports to the Central Coast Water Board, which include updates on SEP task progress and budget details. As of March 31, 2024, Monterey One Water has expended \$334,529 and 58 percent of the total SEP amount is left.

San Juan Bautista ACL Order R3-2022-0031: San Juan Bautista to Hollister Sanitary Sewer Force Main CP

On October 18, 2022, the Central Coast Water Board Executive Officer issued ACL Order R3-2022-0031 to the City of San Juan Bautista to resolve 327 alleged violations associated with effluent limitation exceedances from the City's Wastewater Treatment and Reclamation Plant from March 31, 2007 through March 31, 2022, imposing \$870,000 in administrative civil liabilities. San Juan Bautista chose to suspend \$696,000 of the penalty to implement the San Juan Bautista to Hollister Sanitary Sewer Force Main CP. This CP is to construct a sanitary sewer force main to convey all the City's wastewater to the City of Hollister's Domestic Water Reclamation Facility. Upon completion of the CP, San Juan Bautista will no longer operate a wastewater treatment plant and will no longer require a permit to authorize the discharge of its treated wastewater. United States Environmental Protection Agency (USEPA) issued an Administrative Order on Consent, and San Juan Bautista determined it will complete the CP, along with other projects, to comply with the Administrative Order on Consent.

San Juan Bautista has had delays for various interim CP milestones due to the following 1) delays in obtaining environmental and encroachment permits to initiate the CP, 2) significant delays in obtaining electrical equipment (switch gear and control panel for the pump station) due to supply chain issues during the pandemic, and 3) construction bids exceeded the available funding by \$2.4 million and additional funds needed to be secured prior to construction contracts being awarded. Due to these delays, San Juan Bautista requested an extension to interim project milestones and to modify the final CP completion date from June 26, 2024 to October 21, 2026. On May 28, 2024, the Central Coast Water Board Executive Officer approved the requested CP interim project milestone and project completion dates.

To date, San Juan Bautista has completed the following CP components: obtained all environmental and encroachment permits, awarded the construction contract, issued the notice to proceed construction, and completed approximately five miles of the seven-mile force main pipeline as of May 17, 2024.

San Juan Bautista submits quarterly progress reports and Central Coast Water Board enforcement staff will continue to coordinate with San Juan Bautista staff and USEPA staff on CP progress.

PROPOSED RESOLUTION TO AUTHORIZE USE OF SUPPLEMENTAL ENVIRONMENTAL PROJECT FUNDS FOR THE CENTRAL COAST DRINKING WATER WELL TESTING PROGRAM

At the July 16, 2024 State Water Board's meeting, the Central Coast Water Board is proposing that the State Water Board adopt a [proposed resolution](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2024/StateBoardR3SEPRResolution.pdf)⁹ that would authorize dischargers settling certain administrative civil liabilities for violations associated with

⁹ Proposed resolution:

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2024/StateBoardR3SEPRResolution.pdf.

potential or actual groundwater impacts with the Central Coast Water Board to select to fund the Bay Foundation of Morro Bay's Central Coast Drinking Water Well Testing Program (Drinking Water Well Testing Program) with SEP funds. A resolution is necessary for the State Water Board to grant exemptions to some requirements of the SEP Policy. For a recent update and more information on the Drinking Water Well Testing Program, please refer to the [February 15-16, 2024 Environmental Justice Annual Update](#).¹⁰

ENVIRONMENTAL COMPLAINT SYSTEM

Central Coast Water Board enforcement staff manages complaints received through the [CalEPA \(California Environmental Protection Agency\) Environmental Complaint System](#).¹¹ Central Coast Water Board enforcement staff work with program staff and external agencies to address and/or refer complaints to other agencies. From May 26, 2023 to May 22, 2024, the Central Coast Water Board received 41 complaints and Central Coast Water Board enforcement staff closed 36 of those complaints and referred the other 5 of those complaints to other agencies. Complaints range from a variety of environmental issues. Over the past year, the most common issue raised in complaints was related to alleged water quality impacts associated with homeless encampments. Examples of other alleged activities impacting water quality included illicit discharges of raw sewage, illicit discharges to municipal separate storm sewer systems, illicit construction activities, unpermitted fill in waters of the state, and illicit irrigated agriculture and cannabis activities.

ALIGNMENT WITH CENTRAL COAST WATER BOARD PRIORITIES

Human Right to Water, Environmental Justice, and Racial Equity

The Central Coast Water Board's enforcement priorities are consistent with Central Coast Water Board Human Right to Water Resolution R3-2017-0004 and Racial Equity Resolution R3-2023-0002.

Central Coast Water Board enforcement staff prioritized pursuing enforcement of violations associated with discharges impacting communities with economic, racial, social, and/or environmental inequities that may be more susceptible to the resulting public health impacts. Enforcement staff prioritized violations associated with drinking water impacts in communities that do not have the economic means to provide adequate treatment for contaminated groundwater. For example, enforcement staff is dedicating resources to address violations associated with nitrate loading from irrigated agriculture that impact domestic drinking water wells. Central Coast Water Board enforcement staff plan to continue to prioritize violations impacting Underrepresented Communities.

¹⁰ February 15-16, 2024 Central Coast Water Board meeting agenda:

https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2024/feb/agenda-feb-english.pdf

¹¹ Californians can file complaints in the CalEPA Environmental Complaint System at the following website: <https://calepa.my.salesforce-sites.com/complaints/>

Additionally, Central Coast Water Board enforcement staff expended resources to facilitate projects to advance environmental justice, racial equity, and water equity in Underrepresented Communities. The 1,2,3-TCP Treatment Systems SEP, the Private Lateral Rehabilitation Project for the Castroville Community Services District SEP, and City of Salinas Sanitary Sewer System Flow Monitoring Project ECA are examples how enforcement resources have been dedicated to assist Underrepresented Communities and individuals in addressing drinking water and sewer needs.

If the State Water Board approves the proposed resolution to authorize use of SEP funds for the Central Coast Drinking Water Well Testing Program, Central Coast Water Board enforcement staff can offer to dischargers settling certain administrative civil liabilities to select to fund the well testing program. The Central Coast Drinking Water Well Testing Program conducts focused outreach efforts for Underrepresented Communities and offers free testing of private domestic and small water system wells to inform well users of the quality of their drinking water.

Climate Change

Central Coast Water Board enforcement staff are in the process of evaluating how violations associated with impacts from non-compliance with climate change related adaptation, mitigation, and resiliency projects, or that exacerbate climate change impacts, can inform enforcement priorities. As Central Coast Water Board programs continue to refine permit requirements and priorities related to climate change mitigation and adaptation, this will further refine enforcement priorities focused on climate change.

Central Coast Water Board enforcement staff expended resources to facilitate projects in alignment with the climate change priority. The Private Lateral Rehabilitation Project for the Castroville Community Services District SEP is intended to build climate change resiliency by reducing potential for inflow and infiltration into the district's sanitary sewer system and helping prevent sanitary sewer system overflows at the Castroville and Moss Landing pump stations that are near surface waterbodies. Because climate change has resulted in more intense storm events resulting in more localized flooding, there may be increased potential for inflow and infiltration into the district's sanitary sewer system.

The San Juan Bautista to Hollister Sanitary Sewer Force Main CP will improve water supply resiliency in response to climate change by sending San Juan Bautista's wastewater to a facility that provides advanced treatment and recycles treated wastewater for beneficial reuse.

CONCLUSION

Central Coast Water Board enforcement staff continue to prioritize enforcement actions that address violations that impact water quality in Underrepresented Communities. The SEPs and ECAs that have been recently completed and are currently in progress demonstrate the enforcement team's commitment to address impacts in communities facing economic, racial, social, and/or environmental inequities. Additionally, the

proposed resolution to authorize use of SEP funds for the Central Coast Drinking Water Well Testing Program supports implementation of the Central Coast Water Board's highest priority community need to ensure Underrepresented Communities have safe and affordable drinking water. It is the enforcement team's goal to enhance the Central Coast Water Boards' ability to leverage its enforcement resources to achieve the general deterrence needed to encourage the regulated community to anticipate, identify, and correct potential non-compliance issues before they occur and to assist in finding opportunities for communities to build climate change resiliency. The enforcement team is also focused on making sure that the regulated community corrects violations and prevents them from occurring in the future and ensuring that non-compliant members of the public don't realize significant competitive economic advantage over compliant members of the regulated public.

Central Coast Water Board enforcement staff will continue to reevaluate enforcement priorities and provide an opportunity for the Central Coast Water Board and the public to provide feedback on the general enforcement priorities on an annual basis. The public and Central Coast Water Board members can continue to provide input on enforcement actions taken by the enforcement team as part of the quarterly enforcement report updates.

ATTACHMENTS

1. Enforcement Report
2. Enforcement Action Descriptions
3. Enforcement Report Abbreviations

r:\rb3\shared\enforcement\reports\board meeting reports\2024 meetings\june2024\item10_stfrpt.docx