

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

STAFF REPORT FOR REGULAR MEETING OF FEBRUARY 26-27, 2026

Prepared on February 10, 2026

ITEM NUMBER: 12

SUBJECT: **Consideration of Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order in the matter of Goleta West Sanitary District; Unauthorized Discharge from Sanitary Sewer System (Proposed Stipulated Order R3-2025-0074)**

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KEY INFORMATION:

Location: Goleta West Sanitary District Sewer Line located near the Santa Barbara Municipal Airport in the City of Goleta, Santa Barbara County.

Type and/or Estimated Volume of Discharge: Unauthorized discharge of an estimated 1,071,696 gallons of untreated wastewater from a broken 24-inch sewer line near the Santa Barbara Municipal Airport in Goleta, California, to an un-named tributary to Tecolotito Creek, the Goleta Slough State Marine Conservation Area (Goleta Slough) and its estuary, and the Pacific Ocean.

Existing Orders: Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, Order WQ-2022-0103 (Statewide General Order)

ACTION: **Consider Proposed Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order R3-2025-0074**

SUMMARY

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) Prosecution Team (Prosecution Team) prepared this staff report. The Prosecution Team and Goleta West Sanitary District (Discharger) have engaged in confidential settlement negotiations and have agreed to settle an alleged unauthorized discharge of an estimated 1,071,696 gallons of untreated wastewater that occurred in February 2024 from a broken 24-inch wastewater force main (low-pressure pipeline) near the Santa Barbara Municipal Airport in Goleta, California, to an un-named tributary to Tecolotito Creek, the Goleta Slough and its estuary, and the Pacific Ocean. The proposed final administrative civil liability for the alleged violation is \$1,551,145.

As terms of settlement, the proposed final administrative civil liability will be permanently suspended pending the Discharger's completion of a supplemental environmental project (SEP). The Discharger proposes to implement a third party-performed SEP, the Santa Barbara County Point of Entry and Point of Use Pilot Project, that will provide well sampling for local and state small water systems and domestic drinking water wells in Santa Barbara County. For wells exceeding safe drinking water standards, the proposed SEP will provide replacement drinking water for households and/or the construction and maintenance of Point of Entry (POE) or Point of Use (POU) treatment systems with a priority focus on providing access to safe drinking water for Underrepresented Communities.¹

To resolve the alleged violation, the Central Coast Water Board Assistant Executive Officer is presenting the proposed Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order R3-2025-0074 (Stipulated Order), included as Attachment 1, to the Central Coast Water Board for its consideration for adoption.

DISCUSSION

Background on Goleta West Sanitary District Facilities Related to this Enforcement Matter

The Discharger owns and operates a sanitary sewer system providing wastewater collection services for residents and businesses located within the Western Goleta Valley and Isla Vista in Santa Barbara County, serving approximately 6,100 connections and over 41,575 people (6.75 square miles). The Discharger is required to convey its untreated wastewater, commonly referred to as sewage, to the Goleta Sanitary District Water Resource Recovery Facility (WRRF) for full treatment before an authorized discharge by Goleta Sanitary District to waters of the United States (Pacific Ocean) can occur.

¹ The Central Coast Water Board has defined "Underrepresented Communities" to 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.

Alleged Violations and Assessment of Liability

The proposed Stipulated Order seeks imposition of discretionary administrative civil liability against the Discharger for the alleged violation summarized below.

On February 16 through 17, 2024, the Discharger discharged untreated wastewater from its 24-inch force main (low-pressure pipeline) near the end of its sanitary sewer collection system and the Santa Barbara Municipal Airport in Goleta, California, to an un-named tributary to Tecolotito Creek, the Goleta Slough and its estuary, and the Pacific Ocean, which are all waters of the United States. The Discharger estimated that the unauthorized discharge occurred from around 7:22 PM on February 16, 2024, to 9:00 AM on February 17, 2024, for a total of approximately 14 hours.

On February 21, 2024, at 5:16 PM, the Central Coast Water Board received Governor's Office of Emergency Services (OES) Hazardous Material Spill Report # 24-1024. The Spill Report showed that the Discharger notified OES on February 17, 2024, at 5:55 PM. The initial OES Spill Report indicated that greater than 1,000 gallons of untreated sewage had been spilled to a grassy area near the airport before entering Goleta Slough, with potential further dispersion into the ocean. Between February 17, 2024, and February 23, 2024, the Discharger worked on determining the scope and accurate volume of the spill as information became available. On February 21, 2024, and February 23, 2024, the Discharger provided OES with additional updates of the estimated spill volume and other information.

The Discharger confirmed after an extensive post-spill investigation that the unauthorized discharge was caused by corrosion of the external pipe surface caused by imperfect external corrosion protection and corrosive soils. The Discharger also confirmed that, in accordance with the Discharger's updated Spill Emergency Response Plan (SERP), it contained some wastewater onsite so it did not reach the receiving water and cleaned up the area between the failed pipeline and the first receiving water by vacuuming pooled wastewater, removing contaminated and/or saturated soil, and replacing the failed section of pipeline. The Discharger's most recent update estimated a total spill volume of 1,140,657 gallons, 68,961 gallons of which were recovered before reaching the un-named tributary to Tecolotito Creek, Goleta Slough and its estuary, and the Pacific Ocean. The 1,071,696 gallons (1,140,657 gallons minus 68,961 gallons) of untreated sewage that discharged to the receiving waters was not susceptible to cleanup or recovery. The Discharger also took actions to make repairs, prevent contaminated soil runoff, and conduct revegetation seeding along the spill site.

The proposed Stipulated Order alleges that the unauthorized discharge impaired beneficial uses associated with water recreation, human health, and aquatic life and habitat within the impacted area. As reported in the Discharger's certified Spill Technical Report dated April 2, 2024, the Discharger notified the Santa Barbara County Health Department (County Health Department) on February 17, 2024. The County Health Department responded to the unauthorized discharge of untreated wastewater by issuing a beach closure at Goleta Beach and health warnings for the impacted area beginning on the evening of February 21, 2024. Based on the results of ocean sampling

conducted on March 13, 2024, which indicated compliance with bacteriological water quality standards, the County Health Department lifted the beach closure on March 15, 2024. The beach closure was in place for 23 calendar days. The Discharger reported that the east end of Goleta Beach County Park remained closed due to water quality impacts from beach nourishment operations.

The Prosecution Team alleges that the Discharger violated Prohibition 4.2 of the Statewide General Order, California Water Code section 13376, and/or Clean Water Act section 301 for the unpermitted discharge of an estimated 1,071,696 gallons of untreated wastewater to waters of the United States on February 16 and 17, 2024. The Prosecution Team calculated the proposed administrative civil liability amount using the Penalty Calculation Methodology set forth in the State Water Resources Control Board's (State Water Board) 2017 Water Quality Enforcement Policy (Enforcement Policy). The proposed liability for the alleged violation is \$1,551,145. A detailed description of the unauthorized discharge and the application of the Enforcement Policy's Penalty Calculation Methodology is provided in proposed Stipulated Order Attachment A.

Adoption of the proposed Stipulated Order would resolve the alleged unauthorized discharge to an un-named tributary to Tecolotito Creek, the Goleta Slough and its estuary, and the Pacific Ocean. The Prosecution Team contends that the proposed Stipulated Order is fair, reasonable, and fulfills all its enforcement objectives; that no further action is warranted concerning the alleged violation, except as provided in the proposed Stipulated Order; and that the proposed Stipulated Order is in the public's best interest.

Proposed SEP: Santa Barbara County Point of Entry and Point of Use Pilot Project

During settlement negotiations, the Prosecution Team informed the Discharger that the State Water Board adopted a revised Policy on Supplemental Environmental Projects (SEP Policy) on December 5, 2017, which authorizes the Regional Water Boards to allow settling respondents to satisfy part of any monetary assessment imposed through administrative civil liability orders arising out of settlements by completing or funding a SEP. During these negotiations, the Prosecution Team explained that the Central Coast Water Board supports the inclusion of settlement projects so long as the project meets the criteria specified in the SEP Policy and aligns with the Central Coast Water Board's Settlement Project Priorities.²

The Discharger considered various SEP ideas, including the possibility for local habitat restoration projects, regional projects related to climate change, Goleta Slough water quality improvement monitoring, and also the need for well testing and safe drinking water projects in the southern part of the Central Coast region. Ideas for local restoration projects were not developed further due to the difficulty for the restoration projects to meet the SEP Policy criteria, particularly the limits on implementation

² https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2025/r3-sep-priorities-and-considerations-june-2025.pdf

schedule and contingent budgets.³ The Discharger also briefly considered an Enhanced Compliance Action (ECA⁴) to rehabilitate or realign its force mains, but opted to not pursue this option so it would not be restricted by limits on implementation schedule to complete expanded condition assessments of its force mains and more completely evaluate and implement recommended improvements with complex permitting requirements and multi-agency coordination. Ultimately, the Discharger chose a proposal to fund and implement a third party-performed SEP, the Santa Barbara County Point of Entry and Point of Use Pilot Project (the proposed SEP).

The proposed SEP will provide well sampling for local and state small water systems and domestic drinking water wells in Santa Barbara County. For wells exceeding safe drinking water standards, the proposed SEP will provide replacement drinking water for households and/or the construction and maintenance of POE or POU treatment systems with a priority focus on providing access to safe drinking water for Underrepresented Communities.

Generally, the SEP Policy limits the value of a SEP (the amount that can be treated as a suspended liability) to 50 percent of the total administrative civil liability (50 percent limit). The SEP Policy also requires all SEP funds to be expended on a SEP within 36 months of the stipulated order's adoption.⁵ SEP Policy section VIII, however, provides an exception that allows the Director of the Office of Enforcement (OE Director) to approve a proposed settlement to fund a SEP up to 100 percent of the administrative civil liability where the SEP substantially furthers the human right to water. The OE Director may also approve a project implementation schedule memorialized in a stipulated order allowing for SEP completion within 48 months based on a finding that the SEP provides an exceptional environmental benefit. As explained in proposed Stipulated Order, paragraph 3.a, the OE Director has found that the proposed SEP substantially furthers the human right to water and provides an exceptional environmental benefit in Santa Barbara County. The OE Director has approved exceeding the 50 percent limit and approved the 48-month project implementation schedule for the proposed SEP.

The proposed SEP furthers the Central Coast Water Board's settlement project priorities by implementing a water quality improvement project to (1) advance the human right to water, (2) provide water quality benefits to Underrepresented Communities, and (3) support climate change mitigation and adaptation measures.

³ SEP Policy section VI provides a list of examples of the type of projects that are unacceptable as SEPs. One example is a project for which completion depends on the actions or contributions of entities that are not a party to the settlement nor hired by the settling party to implement the project. (SEP Policy, page 7.)

⁴ ECAs are projects that enable 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. Settlements including ECAs are subject to the rules that apply to SEPs. (2024 Enforcement Policy, pages 39-40.)

⁵ The 50 percent limit and 36-month implementation schedule requirement also apply to ECAs. (2024 Enforcement Policy, page 40.)

The complete SEP Description, Scope of Work, SEP Reporting Requirements, SEP Reporting Schedule, and Budget and Milestones are contained in proposed Stipulated Order Attachment B.

Compliance History

Compliance History Prior to February 2024

Based on Discharger reporting, prior to the February 2024 spill, the Discharger appears to have conducted regular preventative wastewater collection system maintenance. The Discharger reports that it conducted preventative, routine assessment of the system utilizing closed circuit television technology, ongoing maintenance activities documented routinely by its field crews, and completing proactive hydraulic modeling of the system to assess any capacity issues to prevent spills. In addition, the Discharger reports that it has updated documentation that meets or exceeds the minimum requirements of the Statewide General Order—including updated SERP, Sewer System Management Plan (SSMP) Audit, and SSMP Update—as part of its proactive regular maintenance program to address root intrusion, grease build-up, and infiltration and to project system rehabilitation needs. Prior to the February 2024 spill, the Discharger was undergoing a condition assessment effort to study various rehabilitation and assessment methods for the Discharger's two parallel force mains. The Discharger reported spending between \$1,000,000 and \$9,000,000 annually on Capital Improvement Projects before the spill to rehabilitate existing sewer infrastructure. Prior to the alleged violation, the Central Coast Water Board had not issued the Discharger any previous notices of violation or any other administrative civil liability order for any sewer spills.

Sewage Spill in October 2024

On October 30, 2024, the Discharger reported to the Central Coast Water Board a separate unauthorized discharge of sewage near the same area as the February 2024 unauthorized discharge. The Discharger reported that approximately 8,460 gallons of sewage spilled and discharged into stormwater infrastructure, which it assumed is a surface water, and to the surrounding land, and that it fully recovered all but approximately five gallons of the spill. The Discharger notified the oversight agencies, including OES, the Central Coast Water Board, and the County Health Department, of the spill. The Discharger's certified spill report indicated that the spill began at approximately 11:53 a.m., was discovered quickly during the Discharger's enhanced routine inspection of the system following the February spill, and the Discharger was able to stop the spill completely by 1:10 p.m. The Discharger further reported that it inspected the spill location and determined the cause of the spill to be corrosion of an air release valve adapter on the force main that was already under investigation for replacement.

Following the Discharger's report of the spill, the Central Coast Water Board Enforcement Team conducted a site visit in coordination with staff from the 401 Water Quality Certification Program. During the site visit, Central Coast Water Board staff confirmed that the spill was minor and determined no further action was warranted.

Summary of Actions Taken by Goleta West Sanitary District to Prevent Future Spills

The Discharger reports that it has taken the following additional actions to prevent future spills:

- Modeled spill emergency response leadership with immediate emergency declaration and ad-hoc committee formation to direct spill response and implement strategic and comprehensive corrective actions;
- Provided detailed technical reporting with comprehensive spill investigations and updates to the Central Coast Water Board of voluntary efforts;
- Maintained a redundant 18-inch force main that runs parallel to the 24-inch force main that failed to immediately divert flow to and prevent large volumes of additional discharge that could otherwise occur during set up of a traditional bypass system;
- Engaged with engineering experts and interested agencies to update a force main recommissioning plan that was successfully implemented with a hydrostatic pressure test to confirm the integrity of the repaired force main after the spill and pipeline repairs were completed;
- Engaged industry experts to complete a Compliance Evaluation Inspection guiding post-spill practices and informing strategic updates to the Discharger's SERP and SSMP Audit;
- Installed upgraded influent flow metering and improved spill alarm and monitoring system to enable a quicker response to spills from the force main. The improved spill alarm and monitoring system reduces the chance of human error and is calibrated to a sensitive delta trigger to detect change in flow;
- Removed and proactively replaced all other below ground air release valve adapters along the failed force main;
- Completed expanded force main condition assessments (inside and outside) of the 24-inch and 18-inch force mains' integrity with state-of-the-art best available technology (BAT). This expanded pipe condition assessment has become a force main action plan and included (1) a summary and recommendation by MNS Engineers, Inc.; (2) a Smartball Inspection Report by Xylem; (3) a Pipediver electromagnetic Inspection Report by Xylem; (4) a Soil Corrosivity Report by HDR; and (5) an Environmental Constraints Memorandum by Rincon;
- Approved a proposal for Engineering Planning Services by MNS Engineers, Inc. for a Force Main Management Recommendation and possible options for rehabilitation, replacement and realignment of the Discharger's force mains (more information on next steps for the force main should be available in early 2026);

- Updated its SSMP to continue to use BAT to inspect the force mains' integrity (inside and outside) on a recurring basis that is more frequent than industry standard and fix any problems or vulnerabilities identified through those inspections;
- Identified capital improvement funds for recurring BAT inspections and repairs;
- Installed deployment and retrieval infrastructure to improve efficiency of more frequent force main condition assessments;
- Improved coordination of mutual aid assistance for mitigation of the spill with outside agency partners;
- Updated and extended communications and collaboration plans with local community partners; and
- Engaged industry experts for above standard compliance initiatives and organization support, including a climate resiliency plan.

Proposed Stipulated Order

The Prosecution Team and the Discharger have agreed to settle the alleged violation without administrative or civil litigation and present the proposed Stipulated Order, included as Attachment 1, jointly to the Central Coast Water Board for consideration as an Order by settlement, pursuant to California Water Code section 13323 and Government Code section 11415.60. Proposed Stipulated Order Attachment A provides the Prosecution Team's application of the Enforcement Policy's Penalty Calculation Methodology, and Attachment B is the SEP proposal for the Santa Barbara County Point of Entry and Point of Use Pilot Project.

Human Right to Water

If the Central Coast Water Board adopts the proposed Stipulated Order, the Discharger will pay \$1,551,145 to fund and implement a third-party performed SEP, the Santa Barbara County Point of Entry and Point of Use Pilot Project, which will provide well sampling for drinking water wells in Santa Barbara County, with a priority focus on providing access to safe drinking water for Underrepresented Communities. The proposed SEP is aligned with Resolution R3-2017-0004⁶ which adopts the human right to water as a core value and prioritizes the provision of safe, clean, affordable, and accessible water for human consumption, cooking, and sanitation as a top priority for all Central Coast Water Board programs and activities.

Environmental Justice

Adoption of the proposed Stipulated Order would resolve alleged violations associated with the unauthorized discharge to an un-named tributary to Tecolotito Creek, the Goleta Slough and its estuary, and the Pacific Ocean. As a result of the unauthorized

⁶ https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2017/2017-0004_hrtw_fnl.pdf

discharge, the Santa Barbara County Public Health Department closed Goleta Beach for approximately 23 days and the impacts affected many communities.

In the Environmental Justice (EJ) Element planning document, Santa Barbara County determined that Cuyama, New Cuyama, Ventucopa, Sisquoc, Garey, Casmalia, Los Alamos, and Isla Vista meet the state definition of Environmental Justice Communities (EJCs), indicating that these low-income communities and communities of color are disproportionately impacted by pollution and other environmental hazards.⁷ Additionally, several specific, localized areas in northern Santa Barbara County meet the state's definition of a Disadvantaged Community (DAC).⁸ Many people from these communities recreate and use the water resources downstream of the unauthorized discharge. Additionally, the Chumash Heritage National Marine Sanctuary⁹ is a nearby waterbody, that has nationally significant natural, cultural, and historical resources and has and always will be native homelands of Chumash Peoples and their ancestors. The Prosecution Team acknowledges its consideration of multiple potential sources of harm to beneficial uses caused by the alleged violation addressed in the proposed Stipulated Order.

By its design to improve access to safe drinking water in Underrepresented Communities in Santa Barbara County, the proposed SEP is aligned with Central Coast Water Board Racial Equity Resolution R3-2023-0002 and also implements the Central Coast Water Board's Environmental Justice, Racial Equity, and Tribal Engagement Action Plan.¹⁰

Climate Change

The proposed SEP aligns with the Central Coast Water Board's climate change goals, because it will implement a project that will inform and facilitate climate change mitigation and adaptation strategies. Over 90 percent of the Central Coast region's population depends on groundwater as the only drinking water source. Climatic changes are impacting groundwater quantity and quality conditions (e.g., wells going dry, pollution from flooding, migration of plumes, increased pollutant concentrations as groundwater elevations increase and decrease, sea water intrusion), necessitating more routine monitoring of groundwater to ensure water supplies continue to be safe to drink.

⁷ <https://www.countyofsb.org/794/Environmental-Justice-Element>

⁸ The DAC Mapping Tool is used to inform statewide Integrated Water Resources Management (IRWM), Sustainable Groundwater Monitoring Act (SGMA), and California Water Plan implementation efforts and can be found at the following website: <https://gis.water.ca.gov/app/dacs/>. The tool defines a DAC as a census block with a median household income between \$47,203 and \$62,938 and a severely disadvantaged community (SDAC) as a census block with a median household income below \$47,203.

⁹ <https://sanctuaries.noaa.gov/chumash-heritage/>

¹⁰ https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enviro_justice/ej_docs/ej-action-plan.pdf

PUBLIC NOTICE AND RESPONSE TO COMMENTS

The Prosecution Team publicly noticed the proposed Stipulated Order for a 33-day public comment period from October 16, 2025, through November 17, 2025, and received comments from:

- Santa Barbara Channelkeeper
- County of Santa Barbara Supervisor Capps, City of Goleta Mayor Perotte, City of Goleta Councilmember Smith
- Heal the Ocean
- Bernard Friedman

The complete public comments and Prosecution Team responses are included in Attachment 2.

CONCLUSION

If adopted, the proposed Stipulated Order would resolve the alleged violation for an unauthorized discharge to an un-named tributary to Tecolotito Creek, the Goleta Slough and its estuary, and the Pacific Ocean that occurred in February 2024 by the imposition of administrative civil liability against Goleta West Sanitary District in the amount of \$1,551,145. Additionally, the proposed Stipulated Order also includes a SEP that is consistent with the Central Coast Water Board's Settlement Project Priorities and that will provide benefits to communities in Santa Barbara County. The proposed liability is necessary to create an appropriate specific and general deterrent for future violations. The Prosecution Team contends that the proposed Stipulated Order is fair, reasonable, and fulfills all its enforcement objectives; that no further action is warranted concerning the alleged violation, except as provided in the proposed Stipulated Order; and that the proposed Stipulated Order is in the public's best interest.

RECOMMENDATION

Adopt Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order R3-2025-0074, with edits to update the order number to Order R3-2026-0023.

ATTACHMENT

1. Proposed Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order R3-2025-0074
2. Public Comments and Central Coast Water Board Prosecution Team Responses