

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

**STAFF REPORT FOR REGULAR MEETING OF JUNE 17-18, 2026**

Prepared on May 18, 2026

**ITEM NUMBER:** 9

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

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**ACTION:** Information/Discussion

**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 review of existing settlement project priorities and considerations, a status update on settlement projects funded by suspended administrative civil liabilities, 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 January 1, 2026, to March 31, 2026, and include final administrative civil liability orders (Table 1), expedited payment program letters (Table 2), time schedule orders (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 November 1, 2025, to January 31, 2026. 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 and definitions 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's) 2024 Water Quality Enforcement Policy (2024 Enforcement Policy).<sup>1</sup>

## **BACKGROUND FOR ENFORCEMENT PROGRAM UPDATE**

The Central Coast Water Board enforcement team currently consists of Angela Schroeter, Assistant Executive Officer; Kelsey DeLong, Senior Water Resource Control Engineer (Specialist); and Todd Stanley, Water Resource Control Engineer. 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 State Water Board 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' (Regional Water 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 2024 Enforcement Policy in making enforcement-related decisions and calculating 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 2024 Enforcement Policy includes a request for Regional Water Board enforcement staff to seek input on general region-specific enforcement priorities from members of the public and the Regional Water Board members at a regularly noticed public meeting on an annual basis. At the June 2025 Central Coast Water Board Meeting, in response to feedback from Central Coast Water Board members, enforcement staff modified existing enforcement priorities language regarding

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<sup>1</sup> State Water Board, 2024 Water Quality Enforcement Policy, effective November 7, 2024: [https://www.waterboards.ca.gov/water\\_issues/programs/enforcement/docs/2024/2024-enforcement-policy.pdf](https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/2024/2024-enforcement-policy.pdf).

competitive economic advantage over compliant members of the regulated community. These modifications are reflected in the general enforcement priorities presented herein. The Central Coast Water Board enforcement staff recommend keeping the same general enforcement priorities that were last modified in June 2025:<sup>2</sup>

- 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.<sup>3</sup>
- 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, recalcitrant dischargers, and non-compliant dischargers realizing a significant economic benefit and/or competitive economic advantage over compliant members of the regulated public.

Central Coast Water Board enforcement staff recommend maintaining 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 2024 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 actions<sup>4</sup> 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

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<sup>2</sup> State Water Board's and Regional Water Boards' enforcement priorities are available at: [https://www.waterboards.ca.gov/water\\_issues/programs/enforcement/priorities.html](https://www.waterboards.ca.gov/water_issues/programs/enforcement/priorities.html)

<sup>3</sup> 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.

<sup>4</sup> 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) and (i), minimum administrative civil liability under Water Code section 13399.33).

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 Central Coast Water Boards' ability to focus and leverage its enforcement resources and to achieve the general deterrence needed to encourage the regulated community to anticipate, identify, and correct potential non-compliance issues before they occur.

## **SETTLEMENT PROJECT PRIORITIES AND CONSIDERATIONS**

Central Coast Water Board enforcement staff often reach resolution of an administrative civil liability (ACL) through settlement. As part of 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 by agreeing to fund and implement a supplemental environmental project (SEP), enhanced compliance action (ECA), or compliance project (CP) (collectively, settlement projects) as described in a settlement agreement.<sup>5</sup>

The State Water Board and Central Coast Water Board support the inclusion of settlement projects in the settlement of enforcement actions, so long as the projects meet the criteria specified in the State Water Board's 2024 Enforcement Policy and SEP Policy<sup>6</sup> to ensure that selected settlement projects have environmental value, further the enforcement goals and other important policies of the Water Boards, and are subject to appropriate input and oversight by the Water Boards. The SEP Policy 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.

At the June 2025 Central Coast Water Board Meeting, enforcement staff prepared and solicited Central Coast Water Board member input on region-specific settlement project priorities and considerations.

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<sup>5</sup> 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.

<sup>6</sup> 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](https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/seps/20180503_sep_policy_a.md.pdf)

The Central Coast Water Board Enforcement Program Settlement Project Priorities and Considerations<sup>7</sup> help inform dischargers and Central Coast Water Board enforcement staff in their selection of settlement projects, including SEPs and ECAs, during settlement negotiations.

Additionally, in July 2024, the Enforcement Program established the option for dischargers settling certain administrative civil liabilities to select to use SEP funds to support the Bay Foundation of Morro Bay's (Bay Foundation) Central Coast Drinking Water Well Testing Program (Drinking Water Well Testing Program).<sup>8</sup>

### **STATUS UPDATE ON PROJECTS FUNDED BY SUSPENDED ADMINISTRATIVE CIVIL LIABILITIES**

This section of the staff report summarizes the projects funded by suspended ACLs that are in progress between May 31, 2025 and May 5, 2026. During this timeframe, one CP is in-progress, and one SEP is in-progress. For information on SEPs, ECAs, and/or CPs completed or in progress prior to May 2025, please refer to the June 19-20, 2025 Enforcement Report.<sup>9</sup>

Additionally, between May 31, 2025, and May 5, 2026, through settlement, four dischargers directed a total of \$112,206.76 in SEP funds to the Bay Foundation's Drinking Water Well Testing Program.<sup>10</sup>

### **IN-PROGRESS CP**

#### **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

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<sup>7</sup> The Central Coast Water Board Enforcement Program Settlement Project Priorities and Considerations: [https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/enforcement/docs/2026/r3-sep-priorities-and-considerations-june2025.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2026/r3-sep-priorities-and-considerations-june2025.pdf)

<sup>8</sup> See the Bay Foundation's Central Coast Drinking Water Well Testing Program – Use of Supplemental Environmental Project Funds summary document for more details about the program: [https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/enforcement/docs/2024/summary-drinking-water-well-testing-sep.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2024/summary-drinking-water-well-testing-sep.pdf).

<sup>9</sup> June 19-20, 2025 Central Coast Water Board meeting agenda: [https://www.waterboards.ca.gov/centralcoast/board\\_info/agendas/2025/jun/agenda-jun-eng.pdf](https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2025/jun/agenda-jun-eng.pdf)

<sup>10</sup> The Central Coast Water Board enforcement team followed the SEP Policy and State Water Board Resolution 2024-0022 [[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/enforcement/docs/2024/rs2024-0022.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2024/rs2024-0022.pdf)] for the application of conditions in settlement agreements for the suspended liabilities sent as SEP funds to the Bay Foundation's Drinking Water Well Testing Program.

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, completed the seven-mile force main pipeline, constructed the pump station, and are working towards project completion. The force main conveyance system became operational in June 2025. 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.

## **IN-PROGRESS SEP**

### **Goleta West Sanitary District ACL Order R3-2026-0023: The Santa Barbara County Point of Entry and Point of Use Pilot Project, SEP**

On February 27, 2026, the Central Coast Water Board issued ACL Order R3-2026-0023 to Goleta West Sanitary District to resolve the alleged violation for the unauthorized discharge of untreated domestic/municipal wastewater from the Goleta West Sanitary District sanitary sewer system to an un-named tributary to Tecolotito Creek, the Goleta Slough and its estuary, and the Pacific Ocean on February 16 and 17, 2024, imposing \$1,551,145 in administrative civil liabilities. Goleta West Sanitary District chose to suspend the entire penalty amount to fund and implement a third party-performed SEP, the Santa Barbara County Point of Entry (POE) and Point of Use (POU) Pilot Project. This 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 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. This 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. Goleta West Sanitary District submitted their first quarterly progress report on May 1, 2026.

Within 30 days of the ACL Order's effective date, Goleta West Sanitary District executed a contract with Stantec Consulting Services, Inc. (Stantec) to perform the required SEP services and held a virtual project kickoff meeting. To date, Stantec, on behalf of Goleta West Sanitary District, has prepared a scope of work for a community engagement subcontractor and began subcontracting discussions with local community-based organizations; initiated development of a sampling plan in alignment with the SEP proposal, including early data processing and mapping efforts intended to guide targeted outreach to achieve voluntary participation in water quality sampling; and began creating an outreach strategy to raise awareness and recruit participation among Underrepresented Communities in Santa Barbara County. Goleta West Sanitary District is required to submit quarterly reports to the Central Coast Water Board, which include updates on SEP progress and budget details. Central Coast Water Board enforcement staff will continue to coordinate with Goleta West Sanitary District and Stantec staff on SEP progress.

## **ENVIRONMENTAL COMPLAINT SYSTEM**

Central Coast Water Board staff manage complaints received through the CalEPA (California Environmental Protection Agency) Environmental Complaint System.<sup>11</sup> Central Coast Water Board enforcement staff work with program staff and external agencies to address and/or refer complaints to other agencies. From May 21, 2025, to May 5, 2026, the Central Coast Water Board received 40 complaints and Central Coast Water Board staff closed 26 of those complaints and the other 14 are under review. Complaints range from a variety of environmental issues. Over the past year, the most common issues raised in complaints related to alleged illicit cannabis activities, odor nuisance, unpermitted vegetation removal, grading and/or fill in waters of the state, homeless encampments, and illicit discharges to surface water and/or municipal separate storm sewer systems.

## **ALIGNMENT WITH CENTRAL COAST WATER BOARD PRIORITIES**

### **Human Right to Water, Environmental Justice, and Racial Equity**

The Central Coast Water Board's enforcement and settlement project priorities are consistent with Central Coast Water Board's Human Right to Water Resolution R3-

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

2017-0004, Racial Equity Resolution R3-2023-0002, and Environmental Justice, Racial Equity, and Tribal Engagement Action Plan.

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 vulnerable 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 dedicated resources to address violations associated with failure to enroll or report on potential nitrate loading from irrigated agriculture that impact domestic drinking water wells. The Irrigated Lands Program prioritizes enforcement on ranches with severe groundwater quality issues that have the potential to impact Underrepresented Communities (e.g., located in a DAC or severe DAC). Central Coast Water Board enforcement staff plan to continue to prioritize violations impacting Underrepresented Communities.

Central Coast Water Board enforcement staff expended resources to facilitate projects to advance environmental justice, racial equity, and water equity in Underrepresented Communities. The Santa Barbara County Point of Entry and Point of Use Pilot Project for the Goleta West Sanitary District SEP is an example of how enforcement resources have been dedicated to efforts that prioritize providing access to safe drinking water for Underrepresented Communities and individuals. Additionally, Central Coast Water Board enforcement staff established an option to offer to dischargers settling certain administrative civil liabilities to select to use SEP funds for the Bay Foundation's Drinking Water Well Testing Program. The Bay Foundation's 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 requirements, or violations 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.

The Central Coast Water Board's settlement project priorities support implementation of climate change adaptation and mitigation projects. Central Coast Water Board enforcement staff expended resources to facilitate projects in alignment with climate change priorities. 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. The Santa Barbara County Point of Entry and Point of Use Pilot Project for the Goleta West Sanitary District SEP 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 remain safe to drink.

## **CONCLUSION**

Central Coast Water Board enforcement staff continue to prioritize enforcement actions aligning with the Central Coast Water Board's general region-specific enforcement priorities. The enforcement team has focused enforcement actions to address violations that impact water quality in Underrepresented Communities and violations that pose a significant threat to human health, including impacts to drinking water supplies, and to the environment. 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 a significant economic benefit and/or competitive economic advantage over compliant members of the regulated public.

## **ATTACHMENTS**

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

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