

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
NORTH COAST REGION
Administrative Civil Liability Complaint No. R1-2026-0008
In the Matter of Xavier Zavala
Mendocino County
Assessor's Parcel Number 056-350-20-00

This Administrative Civil Liability Complaint (Complaint) is issued by the Assistant Executive Officer of the North Coast Regional Water Quality Control Board (North Coast Water Board) to Xavier Zavala (hereinafter, Respondent) for failure to comply with the Required Actions of North Coast Water Board Cleanup and Abatement Order No. R1-2025-0046 (Cleanup and Abatement Order) in violation of Water Code section 13304. The Complaint is issued pursuant to Water Code section 13323, which authorizes the Executive Officer to issue this Complaint, and Water Code section 7, which authorizes the delegation of the Executive Officer's issuing authority to a deputy, in this case, the Assistant Executive Officer.

The Assistant Executive Officer of the North Coast Water Board hereby alleges that:

BACKGROUND

1. North Coast Water Board staff (Staff) inspected Mendocino County Assessor's Parcel Number 056-350-20-00 (referred to hereinafter as the Property), on August 12, 2025, during the service of a search warrant obtained by California Department of Fish and Wildlife law enforcement officers. The purpose of Staff's inspection was to evaluate onsite development and conditions, and to identify and assess any impacts or threatened impacts to the quality and beneficial uses of waters of the state from unauthorized cannabis cultivation.
2. The Property is located in the Spy Rock area east of Laytonville in Mendocino County, with tributaries to Shell Rock Creek, in the Middle Fork Eel River watershed, passing through the Property. The federal Clean Water Act section 303, subdivision (d), impaired waterbodies list identifies the Middle Fork Eel River as impaired due to elevated sedimentation/siltation and elevated temperature.

3. The Respondent purchased the Property through a deed of trust, which was recorded with the Mendocino County Recorder's Office on June 30, 2020, and has owned the Property at all times relevant to this Complaint.
4. During the August 12, 2025 inspection of the Property, Staff documented site conditions on the Property constituting threats to water quality and beneficial uses and left a field Notice of Water Quality Violations on the Property.
5. On September 26, 2025, Staff mailed via General Logistics Systems (GLS) to the Property and to the Respondent's address in Sanger California (Mailing Address) on record with Mendocino County, a Notice of Violation, Report of the August 12, 2025 inspection, and a draft Cleanup and Abatement Order with a letter inviting the Respondent to provide comments on the draft Cleanup and Abatement Order to Staff by October 15, 2025. The Respondent signed for receipt of the transmittal at the Property on September 30, 2025. The transmittal was also delivered to the Respondent's Mailing Address on September 30, 2025, without a signature.
6. On October 17, 2025, after having received no response or comments from the Respondent, the Executive Officer for the North Coast Water Board issued the Cleanup and Abatement Order to the Respondent, which Staff transmitted to the Property and to the Respondent's Mailing Address using GLS. GLS delivered the Cleanup and Abatement Order to the Mailing Address on October 20, 2025 but refused to return to the Property due to "unsafe location."
7. On November 4, 2025, Staff attempted to retransmit the Cleanup and Abatement Order to the Property using United States Postal Service (USPS) certified mail; however, USPS was unable to deliver due to "NO MAIL RECEPTACLE."
8. The Cleanup and Abatement Order directs the Respondent to complete the Required Actions by November 14, 2025. Specifically, the Respondent was required to remove all cannabis cultivation waste from the riparian setbacks; properly dispose of refuse, solid wastes, and all hazardous wastes to a waste disposal facility authorized to accept that type of waste; implement erosion and sediment control Best Management Practices to disturbed areas under the direction of a Qualified Professional; and submit disposal receipts and photographic confirmation to the North Coast Water Board. Staff received no response or documentation from the Respondent.
9. On November 20, 2025, Staff transmitted a Notice of Violation, with a copy of the Cleanup and Abatement Order enclosed, to the Respondent's Mailing Address using GLS, which was delivered on November 24, 2025.
10. Despite receipt of the Notice of Violation, which explained that the Respondent risked the North Coast Water Board imposing administrative civil liability if he did not comply with the Cleanup and Abatement Order, the Respondent has not

responded to Staff's communications or provided any proof of compliance with the Cleanup and Abatement Order.

11. The Respondent's violation of the Cleanup and Abatement Order remains ongoing.

ALLEGED VIOLATION

12. The Assistant Executive Officer alleges that the Respondent violated Water Code section 13304 by failing to implement corrective actions required by the Cleanup and Abatement Order. The Respondent has failed to implement corrective actions by the November 14, 2025 deadline contained in the Cleanup and Abatement Order, and this violation is ongoing as of the date of this Complaint. Nevertheless, the Prosecution Team exercised prosecutorial discretion in selecting the days of violation for which assessment of liability is proposed. The North Coast Water Board's Cannabis Program Enforcement Strategy¹ contemplates the Assistant Executive Officer issuing administrative civil liability complaints early in the progressive enforcement process. Based on the facts and alleged violation in this case, the Prosecution Team determined that 10 days would have been an appropriate amount of time to issue the Complaint; however, in determining the date of issuance, the Prosecution Team was required to consider the Board's meeting schedule (meetings are generally held every other month) and the Board's ability to accommodate an enforcement action on the meeting agenda, as well as the Respondent's right to a hearing within 90 days of service of the Complaint. Based on these considerations, the earliest the Prosecution Team could issue the Complaint was January 16, 2026, to be heard by the Board at the April meeting. Despite the delay in issuance, the Prosecution Team asserts that assessment for 10 days of violation, between November 15, 2025 and November 24, 2025, is appropriate for this case.

WATER CODE AUTHORITY FOR IMPOSING ADMINISTRATIVE CIVIL LIABILITY

13. Water Code section 13350, subdivision (a), provides that the North Coast Water Board may administratively impose civil liability, in accordance with subdivision (e), to any person who fails to comply with a cleanup and abatement order. Subdivision (e)(1) authorizes the North Coast Water Board to impose liability in an amount not to exceed five thousand dollars (\$5,000) for each day in which the violation occurs.

¹ On December 5, 2024, Staff presented a Cannabis Program Enforcement Strategy to the North Coast Water Board, which, in part, proposed prioritizing and expediting the enforcement process when cleanup and abatement orders are violated. Staff's Summary Report for the Cannabis Program Enforcement Strategy is available at: https://waterboards.ca.gov/northcoast/board_info/board_meetings/12_2024/pdf/7/item7-ssr.pdf

Additionally, where a cleanup and abatement order is violated but there is no discharge, subdivision (e)(1)(B) provides that the North Coast Water Board shall impose liability in an amount no less than one hundred (\$100) for each day in which the violation occurs, except as provided in subdivision (f), which authorizes the North Coast Water Board to impose liability less than the minimum specified in subdivision (e)(1) only when the Board makes express findings for its action based on the factors required to be considered under Water Code section 13327.

14. Pursuant to Water Code section 13327, in determining the amount of any civil liability imposed, the North Coast Water Board is required to take into account the nature, circumstances, extent, and gravity of the violations, whether the discharges are susceptible to cleanup or abatement, the degree of toxicity of the discharges, and, with respect to the violator, the ability to pay, the effect on its ability to continue its business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violations, and other matters that justice may require.

WATER QUALITY ENFORCEMENT POLICY

15. On December 5, 2023, the State Water Board adopted Resolution No. 2023-0043, which adopted the 2024 Water Quality Enforcement Policy (Enforcement Policy). The Enforcement Policy was approved by the Office of Administrative Law and became effective on November 7, 2024. The Enforcement Policy establishes a methodology for assessing administrative civil liability that addresses the factors that are required to be considered when imposing civil liability as outlined in Water Code section 13327.
16. The Prosecution Team has considered the factors required to be considered under Water Code section 13327 for the alleged violation using the methodology in the Enforcement Policy, as described in Attachment A to this Complaint.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

17. Issuance of this Complaint is an enforcement action and is, therefore, exempt from the provisions of the California Environmental Quality Act (Pub. Res. Code § 21000 et seq.), in accordance with California Code of Regulations, title 14, sections 15307, 15308, and 15321, subdivision (a)(2).

MAXIMUM STATUTORY LIABILITY

18. Pursuant to Water Code section 13350, subdivision (e)(1), the statutory maximum liability amount for the days of violation between November 15, 2025 and November 24, 2025 is \$50,000 (\$5,000/day x 10 days).

MINIMUM LIABILITY

19. Pursuant to Water Code section 13350, subdivision (e)(1)(B), the statutory minimum liability amount for the days of violation between November 15, 2025 and November 24, 2025 is \$1,000 (\$100/day x 10 days).

PROPOSED ADMINISTRATIVE CIVIL LIABILITY

20. The Prosecution Team proposes an administrative civil liability amount of \$50,000 for the violation, as detailed in Attachment A to this Complaint. The liability amount calculated for the violation was above the maximum liability amount; therefore, the proposed liability amount reflects a downward adjustment to reflect the statutory maximum liability amount permitted under Water Code section 13350.
21. Notwithstanding the issuance of this Complaint, the North Coast Water Board retains the authority to assess administrative civil liability for violations or days of violation that have not yet been assessed, or for violations or days of violation that may subsequently occur.

THE RESPONDENT IS HEREBY GIVEN NOTICE THAT:

22. The Assistant Executive Officer of the North Coast Water Board proposes administrative civil liability in the amount of **\$50,000** for the Respondent's violation of the Cleanup and Abatement Order, based upon a review of the factors cited in Water Code section 13327 and application of the Enforcement Policy.
23. The North Coast Water Board will hold a hearing on this Complaint during the Board meeting scheduled on April 15 or 16, 2026. The meeting is tentatively planned to occur in Sonoma County, California, at a location to be announced, or at a location posted on the [North Coast Water Board's website](https://www.waterboards.ca.gov/northcoast/) (<https://www.waterboards.ca.gov/northcoast/>), unless the Respondent does one of the following by the February 2, 2026 deadline to submit the Waiver Form (Attachment B):
- a. The Respondent waives the right to a hearing by completing the attached Waiver Form (checking the box next to Option 1) and returning it to both the North Coast Water Board Prosecution Team and Advisory Team, along with payment for the proposed administrative civil liability amount of **\$50,000**; or
 - b. The North Coast Water Board Advisory Team agrees to postpone any necessary hearing after the Respondent requests a delay so that he may have additional time to prepare for the hearing or otherwise resolve this matter by checking the box next to Option 2 on the attached Waiver Form and returning it to the North Coast Water Board Prosecution Team and Advisory Team, along with a letter describing the amount of additional time requested and the rationale.

24. If a hearing is held, it will be governed by the Hearing Procedures (Attachment C). During the hearing, the North Coast Water Board will hear testimony and arguments and affirm, reject, or modify the proposed administrative civil liability, or determine whether to refer the matter to the Attorney General for recovery of judicial civil liability.
25. The Assistant Executive Officer reserves the right to amend the proposed amount of administrative civil liability to conform to the evidence presented.

Date

Claudia E. Villacorta, P.E.
Assistant Executive Officer

Attachments:

- A. Penalty Methodology
- B. Hearing Waiver Form
- C. Hearing Procedures

Attachment A
Penalty Methodology for
Administrative Civil Liability Complaint No. R1-2026-0008
Factors Considered in Developing Recommended Civil Liability
In the Matter of Xavier Zavala

This technical analysis provides a summary of factual and analytical evidence that supports the findings in Administrative Civil Liability Complaint No. R1-2026-0008 (Complaint) and the recommended assessment of administrative civil liability in the amount of \$50,000. The Complaint alleges that Xavier Zavala (the Respondent) failed to implement the Required Actions of the North Coast Regional Water Quality Control Board's (North Coast Water Board's) Cleanup and Abatement Order No. R1-2025-0046 (Cleanup and Abatement Order) for Mendocino County Assessor's Parcel Number 056-350-20-00 (the Property).

SUMMARY OF VIOLATION

The Complaint alleges that the Respondent violated Water Code section 13304 by failing to implement corrective actions by November 14, 2025, as required under the Cleanup and Abatement Order. The Respondent has been in violation of the Cleanup and Abatement Order as of November 15, 2025, and remains in violation.

Nevertheless, the Prosecution Team¹ exercised prosecutorial discretion in selecting the days of violation for which assessment of administrative civil liability is proposed. The North Coast Water Board's Cannabis Program Enforcement Strategy proposes that North Coast Water Board staff (Staff) pursue penalties early in the progressive enforcement process. Based on the facts and alleged violation in this case, the Prosecution Team determined that 10 days would have been an appropriate amount of time to issue the Complaint; however, in determining the date of issuance, the Prosecution Team was required to consider the Board's meeting schedule (meetings are generally held every other month) and the Board's ability to accommodate an

¹ To maintain impartiality of the North Coast Water Board, during potential enforcement hearings as a standard practice in progressive enforcement cases, Staff organizes a group of Staff that works on case development (the Prosecution Team), which consists of the Assistant Executive Officer as the lead prosecutor together with Staff that has inspected the site and reviewed associated enforcement documents. Another group of Staff that has not been involved in the enforcement case can help advise the Regional Water Board (the Advisory Team).

enforcement action on the meeting agenda, as well as the Respondent's right to a hearing within 90 days of service of the Complaint.

Based on these considerations, the earliest the Prosecution Team could issue the Complaint was January 16, 2026, to be heard by the Board at the April meeting. Despite the delay in issuance, the Prosecution Team asserts that assessment for 10 days of violation, between November 15, 2025, the first date following the required deadline in the Cleanup and Abatement Order, and November 24, 2025, is appropriate for this case.

Water Code section 13350, subdivision (e)(1), provides that the North Coast Water Board may impose civil liability administratively in response to violations of Board-issued cleanup and abatement orders in an amount of up to five thousand dollars (\$5,000) per day of violation. **As described below, the Prosecution Team recommends administrative civil liability in the amount of \$50,000, which reflects the statutory maximum.**

PENALTY METHODOLOGY

The State Water Resources Control Board's (State Water Board's) *Water Quality Enforcement Policy*² (Enforcement Policy) establishes a methodology for determining administrative civil liability by addressing the factors that must be considered under Water Code section 13327, specifically:

“the nature, circumstance, extent, and gravity of the violation or violations, whether the discharge is susceptible to cleanup or abatement, the degree of toxicity of the discharge, and, with respect to the violator, the ability to pay, the effect on ability to continue in business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violation, and other matters as justice may require.”

Each factor of the Enforcement Policy's ten-step approach is discussed below, along with the basis for assessing the corresponding scores and proposed administrative civil liability amount.

The violation alleged in the Complaint, and assessed herein, involves failure to implement corrective actions under the Cleanup and Abatement Order. This violation is

² The Prosecution Team applied the 2024 Water Quality Enforcement Policy, which was approved by the Office of Administrative Law and went into effect on November 7, 2024, prior to the violations alleged in the Complaint and discussed herein. A copy of the 2024 [Water Quality Enforcement Policy](https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/2024/2024-enforcement-policy.pdf) can be found at: (https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/2024/2024-enforcement-policy.pdf).

a “non-discharge violation” for purposes of the Enforcement Policy penalty methodology.

Step 1. Actual Harm or Potential for Harm for Discharge Violations

Enforcement Policy Step 1 is only applicable to discharge violations, which are not alleged in the Complaint.

Step 2. Per Gallon and Per Day Assessments for Discharge

Enforcement Policy Step 2 is only applicable to discharge violations, which are not alleged in the Complaint.

Step 3. Per Day Assessment for Non-Discharge Violations

The Enforcement Policy provides that “[t]he Water Boards shall calculate an initial liability factor for each non-discharge violation, considering Potential for Harm and the extent of deviation from applicable requirements. These violations include, but are not limited to, failure to conduct routine monitoring and reporting, failure to provide required information, and the failure to prepare and implement required plans. While all non-discharge violations harm or undermine the Water Boards’ regulatory programs and compromise the Water Boards’ ability to perform their statutory and regulatory functions, some non-discharge violations have the potential to directly or indirectly impact beneficial uses and should result in more serious consequences.” (Enforcement Policy, p. 21.)

To determine the initial liability factor for each violation, the Water Boards use the matrix set forth in Table 3 of the Enforcement Policy to determine a per-day assessment factor for each violation. The matrix considers the potential for harm resulting from the violation, and the deviation from the applicable requirement. Each of these can be “Minor,” “Moderate,” or “Major.”

Potential for Harm:

The Potential for Harm categories are as follows:

- *Minor – The characteristics of the violation have little or no potential to impair the Water Boards’ ability to perform their statutory and regulatory functions, present only a minor threat to beneficial uses, and/or the circumstances of the violation indicate a minor potential for harm.*
- *Moderate – The characteristics of the violation have substantially impaired the Water Boards’ ability to perform their statutory and regulatory functions, present a substantial threat to beneficial uses, and/or the circumstances of the violation indicate a substantial potential for harm. Most non-discharge violations should be considered to present a moderate potential for harm.*

- *Major – The characteristics of the violation have wholly impaired the Water Boards' ability to perform their statutory or regulatory functions, present a particularly egregious threat to beneficial uses, and/or the circumstances of the violation indicate a very high potential for harm. Non-discharge violations involving failure to comply with directives in cleanup and abatement orders, cease and desist orders, and investigative orders, involving reports relating to impaired water bodies and sensitive habitats, should be considered major. (Emphasis added.)*

(Enforcement Policy, pp. 21-22)

Implementation of the Required Actions under the Cleanup and Abatement Order is necessary to clean up the waste or abate the effects of the waste, or in the case of threatened pollution or nuisance, take other necessary remedial actions. By failing to implement the corrective actions, the Respondent wholly impaired the North Coast Water Board's ability to perform its regulatory functions.

Additionally, the waterbodies intended to be protected through the implementation of corrective actions are impaired. The Cleanup and Abatement Order was issued as a result of discharges and threatened discharges of waste to tributaries of the Middle Fork Eel River watershed. The federal Clean Water Act section 303, subdivision (d), impaired waterbodies list identifies the Middle Fork Eel River as impaired due to elevated sedimentation/siltation and elevated temperature. The U.S. Environmental Protection Agency established Total Maximum Daily Loads (TMDLs) for temperature and sediment for the Middle Fork Eel River in December 2003.

Since this non-discharge violation involves failure to comply with a directive in a cleanup and abatement order relating to an impaired waterbody, the Potential for Harm of the violation is **Major**.

Deviation from Requirement:

The Deviation from Requirement categories are as follows:

- *Minor – The intended effectiveness of the requirement remained generally intact (e.g., while the requirement was not met, its intended effect was not materially compromised).*
- *Moderate – The intended effectiveness of the requirement was partially compromised (e.g., the requirement was not met, and the effectiveness of the requirement was only partially achieved).*
- *Major – The requirement was rendered ineffective (e.g., the requirement was rendered ineffective in its essential functions).*

(Enforcement Policy, p. 22)

The failure to implement corrective actions required by the Cleanup and Abatement Order is **Major**. The Respondent has provided no response to Staff's multiple attempts to contact him, and has failed to demonstrate that the corrective actions have been implemented, rendering the requirement ineffective in its essential functions.

Per Day Factors:

Utilizing a Potential for Harm score of **Major** and Deviation from Requirement score of **Major**, Staff selected a Per Day Factor of 0.85, consistent with the midpoint of the range listed Table 3 on page 21 of Enforcement Policy.

Multiple-Day Violations

The Enforcement Policy's Multiple-Day Violations factor applies only to violations lasting more than 30 days. The Complaint seeks administrative civil liability for only 10 days of violation. As such, the alternative approach to penalty calculation for Multiple-Day Violations is not applicable.

Initial Liability Amounts:

The initial liability amount is ***calculated on a per-day basis as follows:***

Per-Day Liability (10 (days) x 0.85 (per day factor) x \$5,000 (statutory maximum per day liability)) = **\$42,500**

Step 4. Adjustment Factors

Under this step, the initial liability amount is adjusted by factors addressing the violator's conduct.

Violator's Conduct:

There are three additional factors to be considered for modification of the amount of initial liability: the violator's culpability, efforts to clean up or cooperate with regulatory authority, and the violator's compliance history.

Culpability:

This factor assesses a violator's degree of culpability prior to the violation. The Enforcement Policy provides that "[h]igher liabilities should result from intentional or negligent violations" as opposed to accidental violations. (Enforcement Policy, p. 24.)

A multiplier between 0.75 and 1.5 is to be used, with a higher multiplier for intentional misconduct or gross negligence, a lower multiplier for more simple negligence, and a neutral assessment of 1.0 where a violator is determined to have acted as a reasonable and prudent person would have. (*Ibid.*)

On September 30, 2025, the Respondent, while at the Property, signed receipt for a letter inviting him to provide comments to Staff by October 15, 2025 on a draft Cleanup and Abatement Order, which proposed the November 14, 2025 deadline to complete

cleanup. On September 30, 2025, General Logistics Systems (GLS) delivered, without a signature, a separate transmittal of the draft Cleanup and Abatement Order to the Respondent's address in Sanger, California (Mailing Address) on record with Mendocino County. The Respondent did not respond to either delivery of the draft Cleanup and Abatement Order.

On October 17, 2025, the Executive Officer for the North Coast Water Board issued the Cleanup and Abatement Order to the Respondent, which GLS delivered to the Respondent's Mailing Address on October 20, 2025.

As of the date of the Complaint, the Respondent has not contacted Staff or provided evidence of implementation of the Required Actions under the Order. A reasonable and prudent person would have made efforts to comply with the deadline contained in the Cleanup and Abatement Order. The Respondent's conduct fell below that of a reasonable and prudent person. The Respondent's failure to implement the corrective actions constitutes an intentional violation of the Cleanup and Abatement Order; thus, a value of **1.25** is appropriate for this violation.

History of Violations:

The Enforcement Policy advises that "[w]here the discharger has no prior history of violations, this factor should be neutral, or 1.0. Where the discharger has prior violations within the last five years, the Water Boards should use a multiplier of 1.1. Where the discharger has a history of similar or numerous dissimilar violations, the Water Boards should consider adopting a multiplier above 1.1." (Enforcement Policy, p. 24.)

There are no previous orders assessing administrative civil liability against the Respondent for previous violations within the last five years. Accordingly, a neutral factor of **1.0** is selected.

Cleanup and Cooperation:

This factor assesses voluntary efforts to clean up and/or to cooperate with regulatory agencies in returning to compliance after the violation. The Enforcement Policy states that the cleanup and cooperation multiplier ranges from 0.75 to 1.5, with a "lower multiplier where there is exceptional cleanup and cooperation compared to what can reasonably be expected, and a higher multiplier where there is not." A reasonable and prudent response to a discharge violation or timely response to a North Coast Water Board order should receive a neutral adjustment as it is assumed a reasonable amount of cooperation is the warranted baseline. (Enforcement Policy, p. 24.)

The Complaint alleges non-compliance with requirements set forth in the Cleanup and Abatement Order. As such, the relevant considerations for this factor are the Respondent's cooperation with Staff and the actions, if any, taken by the Respondent to comply with the Cleanup and Abatement Order after the deadline passed. Following transmittal of the Cleanup and Abatement Order to the Respondent's Mailing Address on October 20, 2025, Staff received no communication from the Respondent. On

November 20, 2025, Staff transmitted a Notice of Violation, with a copy of the Cleanup and Abatement Order enclosed, to the Respondent's Mailing Address, which was delivered on November 24, 2025. The Notice of Violation explained that the Respondent risked the North Coast Water Board imposing administrative civil liability if he did not comply with the Required Actions of the Cleanup and Abatement Order. Despite the delivery of this notice, the Respondent did not contact Staff or provide any evidence that he had taken, or planned to take, steps to resolve the violation. Based on the Respondent's failure to cooperate with Staff and resolve the violation of the Cleanup and Abatement Order, a score of **1.25** has been assessed for the violation.

Step 5. Determination of Total Base Liability Amount

The Total Base Liability is determined by adding the amounts above for each violation, including any adjustment for multiple day violations. Depending on the statute controlling the liability assessment for a violation, the liability can be assessed as either a per day penalty, a per gallon penalty, or both.

The Total Base Liability amount for the violation is calculated on a per-day basis as follows:

$\$42,500 \text{ (Initial Liability)} \times 1.25 \text{ (Culpability Factor)} \times 1.0 \text{ (History of Violations Factor)} \times 1.25 \text{ (Cleanup and Cooperation Factor)} = \$66,406$

Total Base Liability Amount: \$66,406

Step 6. Economic Benefit

Under this step, the Enforcement Policy requires the proposed liability amount to be at least 10 percent higher than any economic benefit realized by the Respondent to ensure that liabilities are not construed as the cost of doing business and that the assessed liability provides a meaningful deterrent to future violations. Because the Respondent is still required to complete the Required Actions under the Cleanup and Abatement Order, the Prosecution Team determined that the sole economic benefit for the Respondent's violation of the Cleanup and Abatement Order is the time value of the money the Respondent would have needed to spend to comply with the Order, which is negligible.

The cost to comply with the Required Actions of the Cleanup and Abatement Order, (e.g. picking up trash, transporting the trash to a licensed waste disposal facility, implementing erosion and sediment control Best Management Practices where a road is hydrologically connected to a watercourse, and submitting pictures and receipts demonstrating that this has been completed) are anticipated to cost approximately \$400 for sixteen (16) hours of general labor at \$25 per hour, \$500 in equipment rental and fuel, and \$100 in disposal fees at a licensed waste disposal facility, totaling \$1,000.

Using the EPA BEN model, Staff determined the economic benefit from delaying the expenditures associated with complying with the Cleanup and Abatement Order. Staff

used the estimated compliance cost of \$1,000 as a one-time non-depreciable expenditure, \$0 in capital investment, and \$0 in annual recurring costs with a noncompliance date of November 15, 2025, the day after the November 14, 2025 deadline, and an estimated compliance date of April 16, 2026, the anticipated hearing date. The resulting economic benefit from delaying the cleanup expenditure is \$15. The economic benefit plus ten percent for this violation is calculated to be \$16.50 (\$15 + \$1.50), which the Total Base Liability Amount for this violation exceeds. Additionally, Water Code section 13350, subdivision (e)(1)(B), sets a higher minimum liability amount for this violation, which the proposed liability exceeds, as further discussed in Step 9.

Step 7. Other Factors as Justice May Require

The Enforcement Policy states that “[i]f the Water Board believes that the amount determined using the above factors is inappropriate, the amount may be adjusted under the provision for ‘other factors as justice may require,’ but only if express findings are made to justify this adjustment.” (Enforcement Policy, p. 27.) The North Coast Water Board may exercise its discretion to include some of the costs of investigation and enforcement in the total administrative civil liability.

Staff Costs

The North Coast Water Board incurred \$3,008 in Staff costs associated with this enforcement action. The total Staff time needed to investigate the alleged violation and prepare the Complaint was 15.93 hours. Staff labor included the work of a Senior Engineering Geologist, Supervising Environmental Scientist, Supervising Water Resources Control Engineer, and Assistant Executive Officer. Although the Prosecution Team has calculated its Staff costs for this action, the Prosecution Team did not assess these costs against the Respondent. This decision was reached after consideration of the Total Base Liability Amount for this violation, which already exceeds the statutory maximum liability amount and will need to be adjusted under Step 9.

Step 8. Ability to Pay and Continue in Business

The Enforcement Policy provides that “[i]f the Water Boards have sufficient financial information necessary to assess the violator’s ability to pay the Total Base Liability Amount or to assess the effect of the Total Base Liability Amount on the violator’s ability to continue in business, the Total Base Liability Amount may be adjusted to address the ability to pay or to continue in business. The ability of a Respondent to pay is determined by its income (revenues minus expenses) and net worth (assets minus liabilities).” (Enforcement Policy, pp. 28-29.)

The Respondent owns the Property, which has a 2025 assessed value of \$426,516. Staff does not have information about the Respondent’s revenues or liabilities that would further inform the Respondent’s ability to pay. Based on the information available, Staff proposes no adjustment to the Total Base Liability Amount.

Step 9. Maximum and Minimum Liability Amounts

The Enforcement Policy requires the North Coast Water Board to consider the maximum and minimum liability amounts that may be assessed for each violation. For all violations, the applicable statute sets a maximum liability amount. For some violations, the statute also establishes a minimum liability amount. The maximum and minimum liability amounts for each violation must be determined for comparison to the liability amounts proposed.

Pursuant to Water Code section 13350, subdivision (e)(1), civil liability may be administratively imposed by the North Coast Water Board on a daily basis in an amount that shall not exceed five thousand dollars (\$5,000) for each day the violation occurs. The Complaint proposes liability for 10 days of violation. Accordingly, the statutory maximum liability amount that can be imposed for this violation is \$50,000. The Total Base Liability of \$66,406 exceeds the maximum amount permitted by statute. Therefore, the Total Base Liability is adjusted to \$50,000 to reflect the maximum liability amount.

Water Code section 13350, subdivision (e)(1)(B), further provides that, “[w]hen there is no discharge, but an order issued by the regional board is violated, except as provided in subdivision (f), the civil liability shall not be less than one hundred dollars (\$100) for each day in which the violation occurs.” Accordingly, the statutory minimum liability amount that can be imposed for the violation is \$1,000.

After the adjustment under this step, the proposed liability for the violation falls within the statutory maximum and minimum liability amounts.

Step 10. Final Liability Amount:

The final liability amount consists of the added amounts for each violation, with any allowed adjustments, provided the amounts are within the statutory minimum and maximum amounts. In consideration of the maximum liability amount determined under Step 9, the Final Liability Amount for the violation is \$50,000, which is the statutory maximum amount.

North Coast Regional Water Quality Control Board

WAIVER FORM FOR ADMINISTRATIVE CIVIL LIABILITY COMPLAINT

By signing this waiver, I affirm and acknowledge the following:

I am duly authorized to represent Xavier Zavala (Respondent) in connection with Administrative Civil Liability Complaint No. R1-2026-0008 (Complaint). I am informed that Water Code section 13323, subdivision (b), states that, "a hearing before the regional board shall be conducted within 90 days after the party has been served... The person who has been issued a complaint may waive the right to a hearing."

- ☐ **OPTION 1: Check here if the Respondent waives the hearing requirement and will pay the liability in full.**
- a. I hereby waive any right the Respondent may have to a hearing before the North Coast Regional Water Quality Control Board (North Coast Water Board).
 - b. I certify that the Respondent will remit payment for the proposed civil liability in the full amount of **fifty thousand dollars (\$50,000)** by submitting a check that references "ACL Complaint No. R1-2026-0008" made payable to the "State Water Board Waste Discharge Permit Fund" and mailed to Attn: ACL Payment Accounting Office, P.O. Box 1888, Sacramento, California, 95812-1888, with a copy of the check sent to the North Coast Water Board at northcoast@waterboards.ca.gov within 30 days from the date on which this waiver is executed.
 - c. I understand the payment of the above amount constitutes a proposed settlement of the Complaint, and that any settlement will not become final until after a 30-day public notice and comment period. Should the North Coast Water Board receive significant new information or comments from any source (excluding the North Coast Water Board's Prosecution Team) during this comment period, the North Coast Water Board's Assistant Executive Officer may withdraw the Complaint, return payment, and issue a new Complaint. I understand that this proposed settlement is subject to approval by the North Coast Water Board, and that the North Coast Water Board may consider this proposed settlement in a public meeting or hearing. I also understand that approval of the settlement will result in the Respondent having waived the right to contest the allegations in the Complaint and the imposition of civil liability.

- d. I understand that payment of the above amount is not a substitute for compliance with applicable laws and that continuing violations of the type alleged in the Complaint may subject the Respondent to further enforcement, including additional civil liability.

☐ ***OPTION 2: Check here if the Respondent waives the 90-day hearing requirement in order to extend the hearing date and/or hearing deadlines. Attach a separate sheet with the amount of additional time requested and the rationale.***

- a. I hereby waive any right the Respondent may have to a hearing before the North Coast Water Board within 90 days after service of the Complaint. By checking this box, the Respondent requests that the North Coast Water Board delay the hearing and/or hearing deadlines so that the Respondent may have additional time to prepare for the hearing or otherwise resolve this matter including through settlement discussions with the Prosecution Team. I understand that it remains within the discretion of the North Coast Water Board to approve the extension.

Respondent or Authorized Representative

(Print Name)

(Signature)

(Date)

California Regional Water Quality Control Board, North Coast Region

HEARING PROCEDURE

FOR ADMINISTRATIVE CIVIL LIABILITY COMPLAINT

R1-2026-0008

ISSUED TO

XAVIER ZAVALA

MENDOCINO COUNTY

HEARING SCHEDULED FOR APRIL 15-16, 2026

PLEASE READ THIS HEARING PROCEDURE CAREFULLY. FAILURE TO COMPLY WITH THE DEADLINES AND OTHER REQUIREMENTS CONTAINED HEREIN MAY RESULT IN THE EXCLUSION OF YOUR SUBMITTAL.

California Water Code section 13323 authorizes the California Regional Water Quality Control Board, North Coast Region (North Coast Water Board) to impose a fine, called administrative civil liability, against any person who violates water quality requirements. The North Coast Water Board's Prosecution Team has issued an Administrative Civil Liability (ACL) Complaint that proposes the North Coast Water Board impose civil liability against Xavier Zavala (Respondent) for the violation alleged in the ACL Complaint.

I. HEARING DATE AND LOCATION

The North Coast Water Board has scheduled a hearing to consider this matter on April 15 or 16, 2025. At the hearing, the North Coast Water Board will consider evidence regarding the violation alleged in the ACL Complaint. After considering the evidence, the North Coast Water Board may impose the proposed civil liability, impose a higher or lower amount, or decline to impose any liability.

The hearing will be held at the following location:

North Coast Water Board, 5550 Skylane Blvd, Ste A, Santa Rosa, CA 95403

The North Coast Water Board's meeting agenda will be issued at least ten days before the meeting and posted on the [North Coast Water Board's website](https://waterboards.ca.gov/northcoast/board_info/board_meetings/) at (https://waterboards.ca.gov/northcoast/board_info/board_meetings/). The hearing may be rescheduled or continued to a later date. Please check the North Coast Water Board's website for the most up-to-date information.

II. PRESIDING OFFICER

For the purposes of this Hearing Procedure, the Presiding Officer is the Chair of the North Coast Water Board or another member of the North Coast Water Board designated in writing by the Chair of the North Coast Water Board.

III. HEARING WAIVER

Water Code section 13323, subdivision (b), requires a hearing on the ACL Complaint within 90 days of service of the ACL Complaint; however, the Respondent may waive this right. The Respondent may decide to waive the hearing requirement and pay the full proposed liability amount and settle the ACL Complaint, contingent on the North Coast Water Board's approval of the settlement. Alternatively, the Respondent may decide to waive the right to a hearing within 90 days to (1) engage in settlement discussions or (2) seek additional time to prepare for the hearing.

To waive the hearing requirement for any of the above reasons, the Respondent should complete and submit the *Waiver Form for Administrative Civil Liability Complaint (Waiver Form)*, included with the ACL Complaint, by the deadline listed under "Important Deadlines" below. If there are multiple Respondents, each of them must submit a separate waiver. Any request to postpone the hearing must be approved by the Presiding Officer.

IV. ADJUDICATORY HEARING REGULATORY FRAMEWORK

A. Applicable Statutes and Regulations

The following statutes and regulations, as implemented by this Hearing Procedure, govern the hearing on the ACL Complaint:

1. California Water Code section 13323;
2. Chapter 4.5 of the Administrative Procedure Act (Gov. Code, § 11400 et seq.), excluding Article 8 (*Language Assistance*), Article 13 (*Emergency Decision*), Article 14 (*Declaratory Decision*) and Article 16 (*Administrative Adjudication Code of Ethics*);
3. Evidence Code sections 801 through 805;
4. Government Code section 11513;
5. California Code of Regulations, title 23, section 648 et seq.; and the

6. State Water Resources Control Board's Water Quality Enforcement Policy (Enforcement Policy).

These [statutes and regulations](https://www.waterboards.ca.gov/laws_regulations) are available online at (https://www.waterboards.ca.gov/laws_regulations). Except for Government Code section 11513, chapter 5 of the California Administrative Procedure Act (Gov. Code, § 11500 et seq.) does not apply to this hearing.

B. Separation of Prosecutorial and Advisory Functions

North Coast Water Board staff and attorneys that have prepared the ACL Complaint (Prosecution Team) have been separated from North Coast Water Board staff and attorneys that will advise the North Coast Water Board on the ACL Complaint (Advisory Team). The Prosecution Team will present evidence for consideration by the North Coast Water Board. The Advisory Team provides legal and technical advice to the North Coast Water Board. Members of the Advisory Team and Prosecution Team are identified below.

Advisory Team:

Valerie Quinto, Executive Officer
Nathan Jacobsen, Attorney IV
Bayley Toft-Dupuy, Attorney IV

Prosecution Team:

Claudia E. Villacorta P.E., Assistant Executive Officer
Kason V. Grady P.E., Supervising Water Resources Control Engineer
Jeremiah Puget, Senior Environmental Scientist
Brian Fuller P.G., Senior Engineering Geologist (Specialist)
Tonya Weiper, Staff Services Manager I (Specialist)
Ana Zurawski, Water Resources Control Engineer
Erika Winner, Engineering Geologist
Heather Jidkov, Attorney IV
Makena Miles, Attorney

Any members of the Advisory Team who normally supervise any members of the Prosecution Team are not acting as their supervisors in this proceeding, and vice versa. Further, members of the Advisory Team have not exercised any authority over the Prosecution Team or advised them with respect to this matter, or vice versa. Claudia Villacorta, Kason Grady, and Jeremiah Puget regularly advise the North Coast Water Board in other, unrelated matters, and other members of the Prosecution Team may have previously acted as advisors to the North Coast Water Board in other, unrelated matters, but no members of the Prosecution Team are advising the North Coast Water Board in this proceeding. Members of the Prosecution Team have not had any

substantive ex parte communications with the North Coast Water Board, or the Advisory Team regarding this proceeding.

C. Ex Parte Communications

Any communication regarding any issue in this proceeding to a North Coast Water Board member or member of the Advisory Team by a Party or Interested Person that is made without notice and opportunity for all Parties to participate in the communication is considered an “ex parte” communication. Ex parte communications are prohibited, except as authorized by statute (e.g., communications regarding non-controversial procedural matters). (Gov. Code, § 11430.10 et seq.)

D. Evidentiary Standards

Government Code section 11513 and Evidence Code sections 801 through 805 apply to this proceeding.

The technical rules of evidence do not apply to this proceeding. The Parties may submit any relevant evidence that is the sort of evidence on which responsible persons are accustomed to rely in the conduct of serious affairs, regardless of the existence of any common law or statutory rule which might make improper the admission of the evidence over objection in civil actions.

Hearsay evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter stated. Hearsay evidence may be used for the purpose of supplementing or explaining other evidence but over timely objection shall not be sufficient in itself to support a finding unless it would be admissible over objection in civil actions. An objection is timely if made before conclusion of all testimony or closing statement if one is provided.

V. HEARING PARTICIPANTS

A. Parties

Parties are the primary participants in the hearing. Parties may present written evidence, offer witness testimony, cross-examine witnesses, and provide closing statements. Parties may be asked to respond to questions from the North Coast Water Board and Advisory Team.

The following are Parties to this proceeding:

1. North Coast Water Board Prosecution Team
2. Xavier Zavala

3. Any other person or entity designated as a party by the Presiding Officer in accordance with Section V.C.

B. Interested Persons (Non-Parties)

Interested Persons include any persons or entities that are interested in the outcome of the proceeding but that have not been designated as a party. Interested Persons may present written or oral non-evidentiary policy statements. Interested Persons are not subject to cross-examination but may be asked to respond to clarifying questions from the North Coast Water Board and Advisory Team.

Interested Persons may not submit evidence (e.g., photographs, eye-witness testimony, and monitoring data). Any person or entity that would like to submit evidence should request to be designated as a party pursuant to Section V.C.

C. Requesting Party Status

Any Interested Person who wishes to participate in the hearing as a party must submit a request in writing by the deadline listed under “Important Deadlines” below. The request must include the following information at a minimum:

1. How the issues to be addressed at the hearing substantially affect the requestor’s interests; and,
2. Why the existing Parties do not adequately represent the requestor’s interests.

The request for party status must also include any requested revisions to the Hearing Procedure.

A Party must submit any written objection to a request for party status by the deadline listed under “Important Deadlines” below.

Following the deadline to submit objections to party status requests, the Presiding Officer will promptly respond to any timely written requests for party status. The Presiding Officer will not grant a request for party status if the Presiding Officer determines the designation of the requestor as a party will impair the interests of justice or the orderly and prompt conduct of the proceeding. The Presiding Officer, when granting a request for party status, may impose restrictions on the requestor’s hearing participation, including limiting or excluding the use of cross-examination and other procedures, to promote the orderly and prompt conduct of the proceeding. Unless and until an Interested Person is granted party status, the deadlines for Interested Persons shall continue to apply.

VI. PREHEARING SUBMITTAL OF NON-EVIDENTIARY POLICY STATEMENTS BY INTERESTED PERSONS

A. Non-Evidentiary Policy Statements

Interested Persons must submit any written non-evidentiary policy statements regarding the ACL Complaint by the deadline listed under “Important Deadlines” below.

Interested Persons are not required to submit written statements to speak at the hearing.

B. Responding to Interested Person Non-Evidentiary Policy Statements

A Party must submit any response to Interested Person written policy statements by the deadline listed under “Important Deadlines” below.

VII. PREHEARING SUBMITTALS BY PARTIES

A. Prehearing Evidence and Argument Submittals (Excluding Rebuttal Evidence)

The Parties must submit the following information in advance of the hearing by the deadline listed under “Important Deadlines” below:

1. All evidence, excluding witness testimony to be presented orally at the hearing, and an exhibit list providing an exhibit number and brief description of each exhibit. Evidence already in the North Coast Water Board’s public files may be submitted by reference as long as the evidence and location are clearly identified. The file names of any electronic copies of exhibits must identify the Party submitting the exhibit, the exhibit number, and a brief identification of the exhibit (e.g., "Resp Ex. 1 - Permit.pdf").
2. All legal and technical arguments or analysis.
3. The name of each witness, if any, whom the Party intends to call at the hearing; the subject of each witness’ proposed testimony; and the estimated time required by each witness to present direct testimony.
4. The qualifications of each expert witness, if any.

B. Prehearing Rebuttal Evidence Submittals

Rebuttal evidence is evidence offered to disprove or contradict evidence presented by an opposing Party.

The Parties must submit any rebuttal evidence in advance of the hearing by the deadline listed under “Important Deadlines” below. Rebuttal evidence shall be limited to rebutting the scope of previously submitted materials; rebuttal evidence that is not responsive to previous submittals may be excluded by the Presiding Officer.

The requirement to submit rebuttal evidence in advance of the hearing applies only to rebut timely-submitted written evidence. Rebuttal evidence pertaining to an issue raised solely during oral testimony need not be submitted in advance of the hearing.

C. Prehearing Objections to Evidentiary Submittals

A Party must submit any objections to prehearing evidentiary submittals by the deadlines listed under “Important Deadlines” below.

These deadlines do not apply to objections to late-submitted evidence. Objections to late-submitted evidence must be made within seven days of the late submittal or at the hearing, whichever is earlier.

D. Prehearing Proposed Findings of Fact and Conclusions of Law

The Prosecution Team must submit, and the other Parties may submit, Proposed Findings of Fact and Conclusions of Law for consideration by the North Coast Water Board and Advisory Team. The Proposed Findings of Fact and Conclusions of Law must include the Party’s proposed penalty calculation, using the methodology prescribed by the Enforcement Policy. The Parties may use this opportunity to highlight specific evidence and argument for the North Coast Water Board’s consideration.

Proposed Findings of Fact and Conclusions of Law must be submitted in Microsoft Word format by the deadline listed under “Important Deadlines” below. The Presiding Officer may prescribe a page limit for the Proposed Findings of Fact and Conclusions of Law.

E. Prohibition on Surprise Evidence

It is the policy of the North Coast Water Board to discourage the introduction of surprise testimony and exhibits. The Presiding Officer may refuse to admit proposed exhibits or testimony into evidence that are not submitted in accordance with this Hearing Procedure and shall refuse to do so when there is a showing of prejudice to any Party or the North Coast Water Board, except where the party seeking to introduce the

proposed exhibits or testimony demonstrates that compliance with this Hearing Procedure would create severe hardship. Excluded material will not be considered.

VIII. REVISIONS TO HEARING PROCEDURE AND PREHEARING CONFERENCE

A. Revisions to Hearing Procedure

The Presiding Officer may revise this Hearing Procedure for good cause (1) on the Presiding Officer's own motion or (2) upon request from any Party or Interested Person seeking party status. A Party or Interested Person seeking party status requesting revisions to this Hearing Procedure must submit the request in writing by the deadline listed under "Important Deadlines" below. Before revising this Hearing Procedure, the Presiding Officer will provide the Parties an opportunity to comment.

B. Prehearing Conference

The Presiding Officer, upon its own motion or upon request from a Party, may schedule a Prehearing Conference with the Parties to discuss any prehearing matter, such as revisions to this Hearing Procedure, designation of additional parties, or evidentiary objections.

IX. HEARING

A. Order of Proceeding

The Presiding Officer will conduct the hearing on the ACL Complaint generally in the order listed under California Code of Regulations, title 23, section 648.5. The Presiding Officer may modify the order of proceeding for good cause.

B. Administration of Oath

All persons intending to testify at the hearing must take the oath administered by the Presiding Officer.

C. Witnesses

Any witness providing written testimony must appear at the hearing and affirm that the written testimony is true and correct and be available for cross-examination.

D. Hearing Time Limits

Parties: Each Party will have a combined total of 30 minutes to present evidence (including examining witnesses), cross-examine witnesses, and provide a closing statement.

Interested Persons: Each Interested Person will have 3 minutes to present oral, non-evidentiary comments or policy statements.

Questions from the North Coast Water Board and the Advisory Team, responses to such questions, and discussion of procedural issues do not count against these time limits.

E. Requesting Additional Hearing Time

Hearing participants who would like additional time must submit their request by the deadline listed under “Important Deadlines” below. Additional time may be provided at the discretion of the Presiding Officer upon a showing that additional time is necessary.

F. Visual Presentations

Each Party may use PowerPoint and other visual presentations at the hearing. The presentation content shall not exceed the scope of previously submitted written material. The Parties must submit their presentations, if any, by the deadline listed under “Important Deadlines” below.

Interested Persons may use a visual presentation as an aid to their oral, non-evidentiary comments or policy statements only with the Presiding Officer’s prior approval.

X. MISCELLANEOUS

A. Submittal Timing and Format

All submittals made pursuant to this Hearing Procedure must be received by 5:00 p.m. on the respective due date within the “Important Deadlines” below. All submittals must be sent to the “Primary Contacts,” identified below. Electronic copies are encouraged. Parties without access to computer equipment are strongly encouraged to have their materials scanned at a copy or mailing center. The Presiding Officer will not reject materials solely for failure to provide electronic copies.

B. Availability of Documents

The ACL Complaint and all submittals made in accordance with this Hearing Procedure are available upon request by contacting the Prosecution Team, identified in the “Primary Contacts” below.

Interested Persons may request to be included in the transmission of all submittals by contacting the Advisory Team.

C. Questions

Questions concerning this Hearing Procedure may be addressed to the Advisory Team attorney, identified in the “Primary Contacts” below.

PRIMARY CONTACTS

Advisory Team:

Valerie Quinto
Executive Officer
North Coast Water Board
Valerie.Quinto@waterboards.ca.gov

Nathan Jacobsen
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Kason V. Grady, P.E.
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Kason.Grady@waterboards.ca.gov

Jeremiah Puget
Senior Environmental Scientist

Xavier Zavala
Complaint No. R1-2026-0008
Attachment C – Hearing Procedures

- 11 -

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Respondent:

Xavier Zavala
1529 13th Street
Sanger, CA 93657

IMPORTANT DEADLINES

Note: Where a deadline falls on a weekend or state holiday, the deadline is extended to the following business day.

January 16, 2026	Prosecution Team issues ACL Complaint, Hearing Procedure, and other related materials	
January 27, 2026	Parties' deadline to request revisions to Hearing Procedure	Section VIII.A
	Interested Persons' deadline to request party status (If requesting party status, this is also the deadline to request revisions to Hearing Procedure)	Section V.C
February 2, 2026	Parties' deadline to submit objections to party status requests	Section V.C
	Respondent's deadline to submit Waiver Form	Section III
February 16, 2026	Interested Persons' deadline to submit written non- evidentiary policy statements	Section VI.A
March 2, 2026	Prosecution Team's deadline to submit prehearing evidence and argument (excluding rebuttal evidence)	Section VII.A
March 16, 2026	Remaining Parties' (including the Respondent(s)) deadline to submit prehearing evidence and argument (excluding rebuttal evidence)	Section VII.A
March 26, 2026	Parties' deadline to submit prehearing rebuttal evidence	Section VII.B
	Parties' deadline to submit responses to Interested Person non-evidentiary policy statements	Section VI.B
	Parties' deadline to submit objections to prehearing evidence submittals (excluding rebuttal evidence)	Section VII.C
	Deadline to submit requests for additional hearing time	Section IX.E
April 2, 2026	Parties' deadline to submit objections to prehearing rebuttal evidence	Section VII.C
	Parties' deadline to submit Proposed Findings of Fact and Conclusions of Law	Section VII.D
April 14, 2026	Parties' deadline to submit copy of visual presentations	Section IX.F
April 15 or 16, 2026	Hearing Date(s)	