

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

In the matter of:

**GOLETA WEST SANITARY DISTRICT;
UNAUTHORIZED DISCHARGE FROM
SANITARY SEWER SYSTEM**

**SETTLEMENT AGREEMENT AND
STIPULATION FOR ENTRY OF
ADMINISTRATIVE CIVIL LIABILITY
ORDER**

**PROPOSED
ORDER R3-2025-0074**

SECTION I:INTRODUCTION

This Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order (Stipulated Order or Order) is entered into by and between the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) Prosecution Team (Prosecution Team) and Goleta West Sanitary District (Discharger) (collectively, Parties) and is presented to the Central Coast Water Board, or its delegate, for adoption as an order by settlement pursuant to California Water Code (Water Code) section 13323 and Government Code section 11415.60. This Stipulated Order resolves the violation alleged herein by the imposition of administrative civil liability against the Discharger in the amount of **\$1,551,145**.

SECTION II: RECITALS

1. The Discharger owns and operates a sanitary sewer system that provides wastewater collection for residents and businesses in Western Goleta Valley and Isla Vista in Santa Barbara County.
2. The Central Coast Water Board regulates the sanitary sewer system under the State Water Resources Control Board's (State Water Board) Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, Order WQ 2022-0103-DWQ (Statewide General Order).
3. Prohibition 4.2 of the Statewide General Order prohibits any discharge from a sanitary sewer system to waters of the State, which includes waters of the United States (U.S.).
4. Federal Water Pollution Control Act (Clean Water Act) section 301 (33 U.S.C. § 1311) prohibits any person to discharge any pollutant into waters of the U.S. without authorization under specific Clean Water Act provisions, including section 402 (33 U.S.C. § 1342) National Pollutant Discharge Elimination System (NPDES) permits for point source discharges.

Stipulated Administrative Civil Liability Order R3-2025-0074
Goleta West Sanitary District

5. California is authorized to implement provisions of the Clean Water Act and issues NPDES permits in accordance with Water Code section 13376. Water Code section 13376 prohibits the discharge of pollutants to waters of the U.S. except as authorized by waste discharge requirements. The term “waste discharge requirements” is the equivalent of the term “permits” as used in the Clean Water Act. (Wat. Code, § 13374.) The Statewide General Order is not an NPDES permit.
6. 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 treatment before an authorized discharge to waters of the U.S. (Pacific Ocean) can occur.
7. The Prosecution Team alleges the following:
 - a. From around 7:22 PM on February 16, 2024, to 9:00AM on February 17, 2024, the Discharger discharged at least 1,071,696 gallons of untreated wastewater from a broken 24-inch force main 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, which are all waters of the U.S.
 - b. The fourteen-hour discharge of untreated wastewater violated Prohibition 4.2 of the Statewide General Order, Water Code section 13376, and/or Clean Water Act section 301.
8. Pursuant to Water Code section 13385, subdivision (a), a person that violates Water Code section 13376, an NPDES permit, and/or Clean Water Act section 301 is subject to administrative civil liability under Water Code section 13385, subdivision (c):

. . . in an amount not to exceed the sum of the following: (1) Ten thousand dollars (\$10,000) for each day in which the violation occurs. (2) Where there is a discharge, any portion of which is not susceptible to cleanup or is not cleaned up, and the volume discharged but not cleaned up exceeds 1,000 gallons, an additional liability not to exceed ten dollars (\$10) multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons.
9. To resolve the alleged violation listed in Section II, paragraph 7, by consent and without further administrative proceedings, the Parties have agreed to the imposition of an administrative civil liability of **\$1,551,145** against the Discharger pursuant to Water Code section 13385. The Prosecution Team calculated the proposed liability using the Penalty Calculation Methodology in the State Water

Board's 2017 Water Quality Enforcement Policy (2017 Enforcement Policy)^{1,2} as shown in Attachment A, which is incorporated herein by reference.

10. The Parties have engaged in settlement negotiations and agree to settle the alleged violation without administrative or civil litigation by presenting this Stipulated Order to the Central Coast Water Board, or its delegate, for adoption as an order by settlement pursuant to Water Code section 13323 and Government Code section 11415.60.
11. The Prosecution Team believes that the resolution of the alleged violation is fair, reasonable, and fulfills all its enforcement objectives; that no further action is warranted concerning the alleged violation, except as provided in this Stipulated Order; and that this Stipulated Order is in the public's best interest.

SECTION III: STIPULATIONS

The Parties incorporate the foregoing Recitals and stipulate the following:

1. **Jurisdiction:** The Parties agree that the Central Coast Water Board has subject matter jurisdiction over the matters alleged in this action and personal jurisdiction over the Parties to this Stipulated Order.
2. **Administrative Civil Liability:** The Discharger hereby agrees to the imposition of **\$1,551,145** in administrative civil liability to resolve the violation alleged in Section II, paragraph 7. In accordance with the State Water Board's 2017 Policy on Supplemental Environmental Projects (SEP Policy),³ the Parties agree that **\$1,551,145** (SEP Amount) will be suspended pending the Discharger's completion of a supplemental environmental project (SEP) in accordance with Section III, paragraph 3 below. If any of the suspended liability becomes due and payable pursuant to Section III, paragraphs 3.k or 3.l, the Discharger must submit timely payment of the assessed amount by check. The check must be made payable to the "State Water Pollution Cleanup and Abatement Account," reference "Order No. R3-2025-0074 CAA Payment," and be mailed to:

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

² The State Water Board amended the 2017 Enforcement Policy on December 5, 2023, and those amendments became effective on November 7, 2024. The Prosecution Team applied the 2017 Enforcement Policy's penalty methodology because the Parties were engaged in settlement negotiations prior to November 7, 2024, and the alleged violation occurred when the 2017 Enforcement Policy was in effect.

³ 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_amd.pdf

State Water Board Accounting Office
Attn: ACL Payment
P.O. Box 1888
Sacramento, CA 95812-1888

The Discharger must provide a copy of the check via e-mail to
the Central Coast Water Board attention:
Tamara.Anderson@waterboards.ca.gov.

3. **Supplemental Environmental Project:** The Discharger proposes to fund and implement a third party-performed SEP, the Santa Barbara County Point of Entry and Point of Use Pilot Project (the SEP), as set forth below and in the attached SEP Proposal (Attachment B), which is incorporated herein by reference. The 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 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.”⁴ The complete SEP Description, Scope of Work, SEP Reporting Requirements, SEP Reporting Schedule, and Budget and Milestones are contained in Attachment B.
 - a. **Compliance with the SEP Policy:** The SEP Amount and the SEP Project Schedule comply with the SEP Policy for the following reasons:
 - i. **SEP Amount:** Generally, the SEP Policy limits the value of a SEP to 50 percent of the total administrative civil liability (50 percent limit). 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 when a SEP is located in or benefits a community with a financial hardship (Financial Hardship Community), an environmental justice community (EJ Community), or a disadvantaged community (DAC), or where the SEP substantially furthers the human right to water. As shown in Attachment B, the SEP substantially furthers the human right to water in Santa Barbara County. On September 25, 2025, the Prosecution team sent an e-mail to the OE Director and provided written notification that the SEP proposed by the Discharger exceeds the 50 percent limit (SEP Notification), as required by the OE Director’s August 8, 2023 memorandum (SEP Memo), which

⁴ 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. See Attachment B for complete definitions of each term.

establishes a blanket approval to exceed the 50 percent limit for SEPs located in or benefiting a DAC, an EJ Community, or a Financial Hardship Community, or where the SEP substantially furthers the human right to water. The OE Director received the SEP Notification and did not respond within 10 days to notify the Prosecution Team that the blanket approval does not apply. In accordance with the SEP Memo, the blanket approval applies and 100 percent of the total administrative civil liability may be spent on the SEP.

- ii. **SEP Project Schedule:** Pursuant to SEP Policy section VIII, the OE Director may approve a project implementation schedule memorialized in a stipulated order allowing for a SEP to be completed within 48 months based on a finding that a SEP provides an exceptional environmental benefit. The SEP Notification also requested the OE Director's approval of the SEP's 48-month project implementation schedule based on a finding that the SEP provides an exceptional environmental benefit. On October 13, 2025, the OE Director approved the 48-month project implementation schedule through issuance of the *Director of the Office of Enforcement's Findings of Exceptional Environmental Benefit for Goleta West Sanitary District's Proposed Supplemental Environmental Project with a 48-month Project Schedule*,⁵ based on the following findings: the SEP substantially complies with the SEP Policy; the SEP furthers the human right to water and benefits public health; the SEP is consistent with and furthers the Central Coast Water Board's policies and objectives for SEPs; and approximately 90 percent of the SEP funds will be spent on the SEP within 36 months of the Stipulated Order's effective date.
- b. **SEP Completion Date:** As a material condition for the Central Coast Water Board's acceptance of this Stipulated Order, the Discharger agrees that it bears ultimate responsibility for completing the SEP in accordance with the SEP Milestones set forth in Table 4 of Attachment B, including expenditure of the full SEP Amount and the completion of the SEP no later than 48 months after this Stipulated Order's effective date (SEP Completion Date).
- c. **SEP Time Extensions:** The Central Coast Water Board's Executive Officer (Executive Officer) may extend the deadlines set forth in the SEP Milestones in Table 4 of Attachment B for good cause if the Discharger demonstrates delays from unforeseeable circumstances, provided that the Discharger and its third party-implementer, Stantec Consulting Services, Inc. (Stantec), continue to undertake all appropriate measures to meet the

⁵ A copy of the OE Director's October 13, 2025 Findings of Exceptional Environmental Benefit is available upon request.

deadlines. Should an extension be needed, the Discharger must notify the Executive Officer in writing at least 30 days prior to the deadline. The written notice must specifically refer to this Paragraph and describe the anticipated length of time the delay may persist, the cause or causes of the delay, the measures taken or to be taken by the Discharger and/or Stantec to prevent or minimize the delay, the schedule by which the measures will be implemented, and the anticipated date of compliance with this Stipulated Order. Any approval of an extension request by the Executive Officer will be sent to the Discharger in writing with the effect of revising this Stipulated Order.

- d. **Publicity:** Whenever the Discharger, or its agents or subcontractors, publicize one or more elements of the SEP, they must state in a **prominent manner** that the project is being undertaken as part of the settlement of an enforcement action by the Central Coast Water Board against the Discharger.
- e. **SEP Inspections:** The Discharger and Stantec agree that Central Coast Water Board staff has permission to inspect any documents associated with SEP implementation and the locations where the SEP is being implemented, but only after permission is obtained from the owner(s) and/or resident(s) where SEP worked was performed.
- f. **No Benefit to Central Coast Water Board Functions, Members, or Staff:** The SEP provides no direct fiscal benefit to the Central Coast Water Board's functions, its members, its staff, or any family member of staff.
- g. **Reporting Requirements:** The Discharger must submit the following written reports to the designated Central Coast Water Board contact identified in Section III, paragraph 5 below:
 - i. **Quarterly Reports:** Quarterly Reports must be submitted by the due dates specified in Table 3 of Attachment B. At a minimum, the Quarterly Reports must include a description and photos of the activities completed during the quarter being reported, an accounting of funds expended, and whether the Discharger is in compliance with the completion dates in Table 3 of Attachment B. If the Discharger is not in compliance with the schedule in Table 4 of Attachment B, the Quarterly Reports must explain the cause(s) of the delay(s) and the anticipated date of compliance with the schedule. The Quarterly Reports must also include any monitoring data collected during the reporting period.
 - ii. **Certification of SEP Completion:** No later than 30 days after the SEP Completion Date, the Discharger must submit a final written report that documents SEP completion and provides a certified

statement of SEP completion (Certification of SEP Completion), signed under penalty of perjury, that documents the following:

- 1) Completion of the SEP in accordance with the terms of this Stipulated Order;
- 2) Expenditures to implement the SEP, which may include external payments to outside vendors and other costs directly associated with completing the SEP, including the work undertaken to complete and submit the SEP Quarterly Reports and Certification of SEP Completion. In preparing the certification, the Discharger may rely upon normal organizational project tracking systems that capture employee time and external payments to outside vendors, such as environmental and information technology contractors or consultants. The Discharger may include photographs, invoices, receipts, certifications, and other materials reasonably necessary for the Central Coast Water Board to evaluate SEP completion and verify the costs incurred.
- 3) All applicable environmental laws and regulations were followed in implementing the SEP, including, but not limited to, the California Environmental Quality Act (CEQA), Water Code, and Clean Water Act.

The Discharger must provide Central Coast Water Board staff with any additional information reasonably necessary to verify the Discharger's SEP expenditures and completion.

- h. **SEP Oversight:** Central Coast Water Board staff will review the Quarterly Reports and Certification of SEP Completion completed by the Discharger to ensure that the SEP was completed in accordance with this Stipulated Order. The Discharger is responsible for any charged oversight costs, which are not included in the SEP Amount.
- i. **Third Party Audit:** If the Central Coast Water Board obtains information reasonably indicating that the Discharger has not expended money in the amounts claimed, or has not adequately completed any of the work in the SEP, the Central Coast Water Board may require, and the Discharger must submit, at its sole cost, a report prepared by an independent third party(ies) acceptable to the Central Coast Water Board, stating that in its professional opinion, the Discharger has or has not expended money in the amounts claimed. In the event of such an audit, the Discharger agrees that the third-party auditor will be provided access to all documents that the auditor requests. The audit must be provided to the designated Central

Coast Water Board contact in Section III, paragraph 5, within three months of the date on which the Central Coast Water Board requires the audit.

- j. **Central Coast Water Board Acceptance of Completed SEP:** Upon the Discharger's satisfaction of its obligations under this Stipulated Order, the completion of the SEP and any audits, the designated Central Coast Water Board contact will request the Central Coast Water Board, or its delegate, to issue a "Satisfaction of Order." The issuance of the Satisfaction of Order will terminate any further obligations under this Stipulated Order and permanently suspend the SEP Amount.
- k. **Failure to Expend the Entire SEP Amount on the Approved SEP:** If the Discharger is unable to demonstrate to the reasonable satisfaction of the Central Coast Water Board or its delegate that the entire SEP Amount has been spent on the completed SEP, the Discharger must pay the difference between the SEP Amount and the amount demonstrated was actually spent on the SEP (the Difference) as an administrative civil liability. The Central Coast Water Board or its delegate will issue a "Notice of Violation" (NOV) that will require the Discharger to pay the Difference to the "State Water Pollution Cleanup and Abatement Account" within 30 days of the NOV's issuance date. The Discharger must submit payment in accordance with the payment method described in Section III, paragraph 2. Payment of the Difference will satisfy the Discharger's remaining obligations to implement the SEP.
- l. **Failure to Complete the SEP:** If the SEP is not fully implemented by the SEP Completion Date, and the Executive Officer has not granted an extension pursuant to Section III, paragraph 3.c, Central Coast Water Board staff will issue an NOV. As a consequence, the Discharger will be liable to pay the entire SEP Amount, less any amount permanently suspended or excused based on the timely and successful completion of any interim project milestone with an identifiable and stand-alone environmental benefit. For the purposes of this Stipulated Order, the following will be considered an interim project milestone with an identifiable and stand-alone environmental benefit in accordance with Table 4 of Attachment B: (1) deliverables related to community outreach and increased community awareness related to domestic wells and small water systems and the SEP; (2) any water quality sampling conducted during Phase 1 and Phase 3; (3) any replacement water deliveries to qualifying households participating in the SEP; (4) each POE and/or POU system that was timely and successfully designed, installed, operated and maintained during Phase 2 and Phase 3 as set forth in Attachment B; and (5) the development of resources for POE/POU recipient use after the SEP-designated maintenance period and/or decommissioning POE/POU systems in Phase 4. Unless the Central Coast Water Board or its delegate determines otherwise, the Discharger will not be entitled to any credit, offset, or reimbursement from the Central Coast Water Board for

expenditures made on the SEP prior to the NOV's issuance date. The amount of the suspended liability owed must be determined via a written, stipulated agreement between the Parties or, if the Parties cannot reach an agreement on the amount owed, via a "Motion for Payment of Suspended Liability" before the Central Coast Water Board or its delegate. Within 30 days of the Central Coast Water Board's or its delegate's determination of the suspended liability assessed, the Discharger must pay the amount owed to the "State Water Pollution Cleanup and Abatement Account" in accordance with the payment method described in Section III, paragraph 2. Payment of the assessed amount will satisfy the Discharger's obligations to implement the SEP.

4. **Compliance with Applicable Laws and Regulatory Changes:** The Discharger understands that payment of administrative civil liabilities in accordance with the terms of this Stipulated Order and/or compliance with the terms of this Stipulated Order is not a substitute for compliance with applicable laws, and that additional violations of the type alleged herein may subject the Discharger to further enforcement, including additional administrative civil liability. Nothing in this Stipulated Order excuses the Discharger from meeting any more stringent requirements that may be imposed hereafter by changes in applicable and legally binding legislation or regulations.
5. **Party Contacts for Communications Related to this Stipulated Order:**

For the Central Coast Water Board:

Tamara Anderson
Supervising Water Resource Control Engineer
Aerovista Place, Suite 101
San Luis Obispo, CA 93401
(805) 549-3334
Tamara.Anderson@waterboards.ca.gov

For the Discharger:

Brian McCarthy and Joey Hilliard
Co-General Managers
PO Box 4
Goleta, CA 93116-0004
(805) 968-2617
BMcCarthy@goletawest.org; JHilliard@goletawest.org

Kathryn A. Tipple
Brownstein Hyatt Farber Schreck, LLP
225 Broadway, Suite 1670
San Diego, CA 92101
(619) 702-6919
KTipple@BHFS.com

6. **Attorney's Fees and Costs:** Except as otherwise provided herein, each Party must bear all attorneys' fees and costs arising from the Party's own counsel in connection with the matters set forth herein.
7. **Matters Addressed by this Stipulated Order:** Upon the Central Coast Water Board's or its delegate's adoption, this Stipulated Order represents a final and binding resolution and settlement of the alleged violation contained in Attachment A. The provisions of this Paragraph are expressly conditioned on the Discharger's full satisfaction of the obligations to implement the SEP in accordance with the terms of this Stipulated Order or full payment of any administrative civil liability amount assessed in accordance with Section III, paragraphs (k) and (l).
8. **Public Notice:** The Discharger understands that this Stipulated Order must be noticed for a 30-day public review and comment period prior to consideration by the Central Coast Water Board, or its delegate. If significant new information is received that reasonably affects the propriety of presenting this Stipulated Order to the Central Coast Water Board, or its delegate, for adoption, the Central Coast Water Board Prosecution Team may unilaterally declare this Stipulated Order void and decide not to present it to the Central Coast Water Board, or its delegate. The Discharger agrees that, once signed, the Discharger may not rescind or otherwise withdraw its approval of this proposed Stipulated Order unless there are significant modifications.
9. **Procedure:** The Parties agree the procedure contemplated for public review of this Stipulated Order and the Central Coast Water Board's, or its delegate's, adoption of this Stipulated Order is lawful and adequate. The Parties understand that the Central Coast Water Board, or its delegate, have the authority to require a public hearing on this Stipulated Order. In the event procedural objections are raised or the Central Coast Water Board, or its delegate, requires a public hearing before adopting this Stipulated Order, the Parties agree to meet and confer concerning any such objections and may agree to revise or adjust the procedure and/or this Stipulated Order as necessary or advisable under the circumstances.
10. **No Waiver of Right to Enforce:** The failure of the Central Coast Water Board to enforce any provision of this Stipulated Order must in no way be deemed a waiver of such provision, or in any way affect the validity of this Stipulated Order. The failure of the Central Coast Water Board to enforce any such provision must not preclude it from later enforcing the same or any other provision of this Stipulated Order. No oral advice, guidance, suggestions, or comments by employees or officials of any Party regarding matters covered under this Stipulated Order must be construed to relieve any Party regarding matters covered in this Stipulated Order. The Central Coast Water Board reserves all rights to take additional enforcement actions, including, without limitation, the issuance of administrative civil liability complaints or orders for violations other than those addressed by this Stipulated Order.

11. **Effect of this Stipulated Order:** Except as expressly provided in this Stipulated Order, nothing in this Stipulated Order is intended nor shall it be construed to preclude the Central Coast Water Board or any state agency, department, board or entity or any local agency from exercising its authority under any law, statute, or regulation.
12. **Interpretation:** This Stipulated Order must be construed as if the Parties jointly prepared it and any uncertainty or ambiguity must not be interpreted against any one party.
13. **Modification:** The Parties must not modify this Stipulated Order by oral representation made before or after its execution. Except as otherwise provided in Section III, paragraph 3.c, all modifications must be made in writing, signed by all Parties, and approved by the Central Coast Water Board or its delegate.
14. **Integration:** This Stipulated Order constitutes the entire agreement between the Parties and may not be amended or supplemented except as provided for in this Stipulated Order.
15. **If the Order Does Not Take Effect:** In the event that this Stipulated Order does not take effect because the Central Coast Water Board or its delegate does not approve it, or a court or the State Water Board vacates it in whole or in part, the Parties acknowledge that the Prosecution Team may issue an administrative civil liability complaint and proceed to a contested evidentiary hearing before the Central Coast Water Board, or may continue to pursue settlement. The Parties agree that all oral and written statements and agreements made during the course of settlement discussions will not be admissible as evidence in any subsequent administrative or judicial proceeding or hearing and will be fully protected by California Evidence Code sections 1152 and 1154; California Government Code section 11415.60; and any other applicable privilege under federal and/or state law. The Parties also agree to waive any and all objections related to their efforts to settle this matter, including, but not limited to:
 - a. Objections related to prejudice or bias of any of the Central Coast Water Board members or their advisors and any other objections that are premised in whole or in part on the fact that the Central Coast Water Board members or their advisors were exposed to some of the material facts and the Parties' settlement positions as a consequence of reviewing this Stipulated Order, and therefore may have formed impressions or conclusions, prior to conducting any contested evidentiary hearing in this matter; or
 - b. Laches or delay or other equitable defenses based on the time for administrative or judicial review to the extent this period was extended by these settlement proceedings.

16. **No Admission of Liability/No Waiver of Defenses:** In settling this matter, the Discharger does not admit to any violations of the Water Code, the Clean Water Act, any Central Coast Water Board or State Water Board order, or any other federal, State, or local laws or ordinances, but recognizes that this Stipulated Order may be used as evidence of a prior history of violation consistent with Water Code sections 13327 and 13385, subdivision (e), and the Enforcement Policy. By entering into this agreement, the Discharger does not waive any defenses or arguments related to any new enforcement action that may be brought by the Central Coast Water Board, including any brought under its discretionary enforcement authority reserved herein.
17. **Waiver of Hearing:** The Discharger has been informed of the rights Water Code section 13323, subdivision (b) provides and hereby waives its right to a hearing before the Central Coast Water Board prior to adoption of this Stipulated Order. However, the Discharger may appear at any Central Coast Water Board hearing where approval of this settlement is discussed, and if the settlement is not adopted and the matter proceeds to the Central Coast Water Board or State Water Board for a hearing, the Discharger does not waive its right to an adjudicatory hearing before any order other than this Stipulated Order is imposed.
18. **Waiver of Right to Petition or Appeal:** The Discharger hereby waives the right to petition the Central Coast Water Board's adoption of this Stipulated Order for review by the State Water Board, and further waives the rights, if any, to appeal the same to a California Superior Court and/or any California appellate-level court.
19. **Covenant Not to Sue:** Upon the effective date of this Stipulated Order, the Discharger covenants not to sue or pursue any administrative or civil claims against the State of California, any State agency, or its officers, Board members, employees, representatives, agents, or attorneys arising out of or relating to any matter expressly addressed by this Stipulated Order or the SEP, except that this covenant is not intended to, and does not, limit the Discharger's rights to sue over other Central Coast Water Board orders (e.g., permits, cease and desist orders, etc.) or limit the Discharger's rights to defend against any additional enforcement or other actions taken by the Central Coast Water Board or its employees, representatives, agents, or attorneys, and shall not release any claims or complaints against any State agency, or the State of California or its officers, Central Coast Water Board members, employees, representatives, agents, or attorneys to the extent such covenant would be prohibited by California Business and Professions Code section 6090.5 or by any other statute, rule, regulation, or legal principle of similar effect.
20. **State and Central Coast Water Boards Not Liable:** Neither the State Water Board and Central Coast Water Board members, nor the State Water Board and Central Coast Water Board staff, attorneys, or representatives shall be liable for any injury or damage to persons or property resulting from the negligent or

intentional acts or omissions by the Discharger or its respective directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Stipulated Order, nor shall the Central Coast Water Board, its members, staff, attorneys, or representatives be held as parties to or guarantors of any contract entered into by the Discharger, or its directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Stipulated Order.

21. **Authority to Bind:** Each person executing this Stipulated Order in a representative capacity represents and warrants that they are authorized to execute this Stipulated Order on behalf of and to bind the entity on whose behalf they execute this Stipulated Order.
22. **Necessity for Written Approvals:** All approvals and decisions of the Central Coast Water Board or its delegate under the terms of this Stipulated Order must be communicated to the Discharger in writing. No oral advice, guidance, suggestions, or comments by employees or officials of the Central Coast Water Board regarding submissions or notices must be construed to relieve the Discharger of its obligation to obtain any final written approval required by this Stipulated Order.
23. **No Third-Party Beneficiaries:** This Stipulated Order is not intended to confer any rights or obligation on any third party or parties, and no third party or parties shall have any right of action under this Stipulated Order for any cause whatsoever.
24. **Severability:** This Stipulated Order is severable; should any provision be found invalid, the remainder remains in full force and effect.
25. **Effective Date:** This Stipulated Order becomes effective and binding on the Parties upon the date the Central Coast Water Board, or its delegate, adopts the Order incorporating the terms of this Stipulated Order.
26. **Counterpart and Electronic Signatures:** This Stipulated Order may be executed and delivered in any number of counterparts, each of which when executed and delivered must be deemed to be an original, but such counterparts must together constitute one document. Further, this Stipulated Order may be executed by electronic signature, and any such electronic signature by any Party hereto must be deemed to be an original signature and must be binding on such Party to the same extent as if such electronic signature were an original signature.

IT IS SO STIPULATED.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION, PROSECUTION TEAM**

By: _____
Angela Schroeter
Assistant Executive Officer
Central Coast Water Board

IT IS SO STIPULATED.

GOLETA WEST SANITARY DISTRICT

*Original Signed by Brian McCarthy
On October 15, 2025*

Date: _____ By: _____
Brian McCarthy
Co-General Manager
Goleta West Sanitary District

*Original Signed by Joey Hilliard
On October 15, 2025*

Date: _____ By: _____
Joey Hilliard
Co-General Manager
Goleta West Sanitary District

ORDER OF THE CENTRAL COAST WATER BOARD:

1. This Order is issued pursuant to Water Code section 13323 and Government Code section 11415.60 and incorporates the foregoing Sections I through III and Attachments A and B, by this reference as if set forth fully herein.
2. This is an action to enforce the laws and regulations administered by the Central Coast Water Board. The Central Coast Water Board finds that issuance of this Stipulated Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, sections 21000 et seq.), in accordance with California Code of Regulations, title 14, section 15321, subdivision (a)(2). Additionally, this Stipulated Order generally accepts the plans proposed for the SEP prior to implementation. Mere submittal of plans is exempt from CEQA because submittal will not cause a direct or indirect physical change in the environment.
3. The Central Coast Water Board's Executive Officer is authorized to refer this matter directly to the Attorney General for enforcement if the Discharger fails to perform any of its obligations under this Order.

IT IS HEREBY ORDERED, pursuant to Water Code section 13323 and Government Code section 11415.60, on behalf of the California Regional Water Quality Control Board, Central Coast Region.

Ryan Lodge
Executive Officer
Central Coast Water Board

Attachment A: Violation Factor Consideration and Penalty Calculation Methodology

Attachment B: Santa Barbara County Point of Entry and Point of Use Pilot SEP Proposal

ATTACHMENT A

FACTOR CONSIDERATION AND PENALTY CALCULATION METHODOLOGY FOR ADMINISTRATIVE CIVIL LIABILITY ORDER R3-2025-0074

GOLETA WEST SANITARY DISTRICT SANITARY SEWER SYSTEM SANTA BARBARA COUNTY

This document provides details on the proposed administrative civil liability penalty methodology related to Goleta West Sanitary District's (Discharger or District) sanitary sewer overflow (SSO) that resulted in an unauthorized discharge of untreated domestic/municipal wastewater (untreated wastewater) to waters of the United States (U.S.) from February 16, 2024, to February 17, 2024. The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) Prosecution Team derived the proposed administrative civil liability following the 2017 State Water Resources Control Board's (State Water Board) Water Quality Enforcement Policy (Enforcement Policy).¹

Application of the Water Board's Enforcement Policy

On April 4, 2017, the State Water Board adopted Resolution 2017-0020 amending the Enforcement Policy. The Office of Administrative Law approved the 2017 Enforcement Policy and it became effective on October 5, 2017. The Enforcement Policy establishes a penalty methodology for assessing administrative civil liability for violations of the California Water Code (Water Code) and Federal Water Pollution Control Act (Clean Water Act). Use of the methodology incorporates Water Code sections 13327 and 13385 that require the Central Coast Water Board to consider specific factors when determining the amount of civil liability to impose, including "...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 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 violation, and other matters that justice may require."

The penalty methodology calculation procedural steps are discussed and shown in detail below.

Regulatory Basis for Alleged Violation and Proposed Liability

The Discharger has been enrolled in the State Water Board's *Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, Order WQ 2022-*

¹ The State Water Board's Water Quality Enforcement Policy (effective October 5, 2017) and penalty calculation methodology worksheet are available at:
https://www.waterboards.ca.gov/water_issues/programs/enforcement/water_quality_enforcement.html

0103-DWQ (Statewide General Order) or its preceding Order 2006-0003-DWQ since 2006.² Prohibition 4.2 of the Statewide General Order provides that “[a]ny discharge from a sanitary sewer system, discharged directly or indirectly through a drainage conveyance system or other route, to waters of the State is prohibited.” Waters of the State include waters of the U.S.

Clean Water Act section 301 prohibits the discharge of any pollutant to waters of the U.S. except as authorized by a National Pollutant Discharge Elimination System (NPDES) permit.

California is authorized to implement provisions of the Clean Water Act. (Wat. Code, §§ 13370-13389.) Water Code section 13376 prohibits the discharge of pollutants to waters of the U.S. except as authorized by waste discharge requirements. The term “waste discharge requirements” is the equivalent of the term “permits” as used in the Clean Water Act. (Wat. Code, § 13374.)

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 treatment before an authorized discharge to waters of the U.S. (Pacific Ocean) can occur.

On February 16 through 17, 2024, the District discharged untreated wastewater from its 24-inch force main 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, which are all waters of the U.S. 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.³ A break in the force main caused the discharge. The Discharger estimated that a total volume of 1,071,696 gallons discharged to the creek, slough, and ocean.

The Prosecution Team alleges that the Discharger violated Prohibition 4.2 of the Statewide General Order,⁴ 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 U.S. on at least February 16 through 17, 2024.

A discharger who violates Water Code section 13376 and/or Clean Water Act section 301 is subject to administrative civil liability under Water Code section 13385, subdivisions (a) and (c).

² The State Water Board’s Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, Order WQ 2022-0103-DWQ is available at:
https://www.waterboards.ca.gov/water_issues/programs/ssol/

³ The Prosecution Team exercised discretion to allege only one day of violation because the unauthorized discharge occurred overnight but less than twenty-four hours.

⁴ The Statewide General Order is not an NPDES permit.

Penalty Calculation Methodology Procedural Steps

Step 1. Actual or Potential for Harm for Discharge Violations

This initial step for discharge violations is used to determine the actual harm or potential harm to the waterbody's beneficial uses caused by the violation using a three-factor scoring system to quantify: (1) the degree of toxicity of the discharge (i.e., the physical, chemical, biological, or thermal characteristics of the discharge); (2) the actual harm or potential harm to beneficial uses; and (3) the discharge's susceptibility to cleanup or abatement.

Factor 1: The Degree of Toxicity of the Discharge

Factor 1 Background: The evaluation of the degree of toxicity considers the physical, chemical, biological, and/or thermal characteristics of the discharge, waste, fill, or material involved in the violation or violations, and the risk of damage the discharge could cause to the receptors or beneficial uses. Evaluation of the discharged material's toxicity should account for all the characteristics of the material **prior to discharge**, including, but not limited to, whether it is partially treated, diluted, concentrated, and/or a mixture of different constituents. Toxicity analysis should include assessment of both lethal and sublethal effects such as effects on growth and reproduction.

The Enforcement Policy specifies assigning a factor score ranging from 0 to 4 based on whether the risk or threat of the discharged material to potential receptors (i.e., human, environmental, ecosystem health exposure pathways) is negligible (0) to significant (4).

Factor 1 Consideration: Based on the physical, chemical, biological, or thermal characteristics of untreated wastewater before discharge, the risk or threat the discharged material poses to potential receptors and beneficial uses is **above moderate (3)**. "Above Moderate" is assigned when the physical, biological, and/or chemical characteristics of the discharged material exceed known risk factors and/or there is substantial concern regarding receptor protection.

The physical characteristics of untreated municipal wastewater include solids that may settle or stay in suspension causing deposition on the receiving water floor affecting aquatic habitats or aesthetic uses throughout the water column. Oil or grease may also be present and float at the receiving water surface causing aesthetic impacts. Biologically, wastewater also contains high levels of pathogenic organisms harmful to human health through direct contact or ingestion, or via foodborne pathways such as fish consumption. Organic material and ammonia can also deplete dissolved oxygen in receiving waters, adversely affecting aquatic organisms and wildlife. Excess nutrients in the forms of nitrogen or phosphorus can cause nutrient over-enrichment affecting plant life. Chemically, ammonia can cause toxicity in aquatic life, as can toxic pollutants from industrial, commercial, or business/household wastewater sources commonly present in municipal wastewater. While many such toxic pollutants are not directly removed by treatment methods commonly employed at wastewater treatment plants, overflows such as those considered here eliminate indirect or coincidental removal during treatment

(e.g., removal with solids/organic materials or volatilization during agitation) because the wastewater did not get treated at a wastewater treatment plant.

The characteristics of untreated wastewater as discussed above represents a substantial risk to marine life and human health. The levels of pathogenic organisms in untreated wastewater can cause serious illnesses and result in harm to human health. A score of **(3) Above Moderate** is assigned for this factor.

Factor 2: Actual Harm or Potential Harm to Beneficial Uses

Factor 2 Background: The evaluation of the actual harm or the potential harm to beneficial uses factor considers the harm to beneficial uses in the affected receiving water body that may result from exposure to the pollutants or contaminants in the discharge, consistent with the statutory factors of the nature, circumstances, extent, and gravity of the violation. The Central Coast Water Board may consider actual harm or potential harm to human health, in addition to harm to beneficial uses. Because actual harm is not always quantifiable due to untimely reporting, inadequate monitoring, and/or other practical limitations, potential harm can be used under this factor. Actual harm as used in this section means harm that is documented and/or observed. Potential harm should be evaluated in the context of the specific characteristics of the waste discharged and the specific beneficial uses of the impacted waters.

The Enforcement Policy specifies a score ranging from 0 to 5 based on a determination of whether direct or indirect harm, or potential for harm, from a violation is negligible (0) to major (5).

Factor 2 Consideration: The harm or potential harm to beneficial uses from the discharge is **major (5)**. “Major” is assigned when there is high harm or threat of harm to beneficial uses. A score of “Major” is typified by observed or reasonably expected potential significant impacts, and involves potential for or actual acute, and/or chronic (e.g., more than five days) restrictions on, or impairment of, beneficial uses, aquatic life, and/or human health. As explained in further detail below, the Santa Barbara County Health Department (County Health Department) closed a beach for more than five days, causing actual chronic restrictions on and impairment of beneficial uses. These impacts are significant.

The following paragraphs identify the beneficial uses for each receiving water body impacted or potentially impacted by the District’s unauthorized discharge of sewage.

Tecolotito Creek and Goleta Slough and Estuary Inland Surface Water Beneficial Uses

The Water Quality Control Plan for the Central Coastal Basin, 2019 Edition (2019 Basin Plan),⁵ identifies and defines beneficial uses in Chapter 2, *Present and Potential Beneficial Uses*. Chapter 2, Table 2-1, *Identified Uses of Inland Surface Waters*, lists

⁵ The 2019 Basin Plan was in effect at the time of the violation and is viewable at the Central Coast Water Board’s Basin Plan website:
https://www.waterboards.ca.gov/centralcoast/water_issues/programs/basin_plan/

the beneficial uses of Tecolotito Creek and the Goleta Slough and its estuary (referred to as Goleta Slough/Estuary in Table 2-1).

Both Tecolotito Creek and the Goleta Slough and its estuary have the following beneficial uses:

- Water contact recreation (REC-1)
- Non-contact water recreation (REC-2)
- Wildlife habitat (WILD)
- Warm fresh water habitat (WARM)
- Migration of aquatic organisms (MIGR)
- Commercial and sport fishing (COMM)

In addition to the above beneficial uses, Goleta Slough and its estuary also have the following beneficial uses:

- Spawning, reproduction, and/or early development (SPWN)
- Preservation of biological habitats of special significance (BIOL)
- Rare, threatened, or endangered species (RARE)
- Estuarine habitat (EST)
- Shellfish harvesting (SHELL)

In addition to REC-1, REC-2, WILD, WARM, MIGR, and COMM, Tecolotito Creek also has the following beneficial uses:

- Municipal and domestic supply (MUN)
- Groundwater recharge (GWR)
- Cold fresh water habitat (COLD)
- Fresh water replenishment (FRSH)

Of the designated beneficial uses for these waters, those most relevant to, and harmed or potentially harmed by, the District's discharge of untreated sewage are the beneficial uses associated with water recreation, human health, and aquatic life and habitat (REC-1, REC-2, COLD, WARM, MIGR, SPWN, BIOL, RARE, EST, SHELL, WILD, and COMM).

Coastal Waters Beneficial Uses

Chapter 2, Table 2-2, *Existing and Anticipated Uses of Coastal Waters*, also lists beneficial uses for the Goleta Slough. Table 2-2 shares the REC-1, REC-2, SHELL, RARE, and WILD beneficial uses listed above from 2019 Basin Plan Table 2-1, and adds marine habitat (MAR). These beneficial uses are adversely impacted by the discharge of untreated sewage.

Pacific Ocean Beneficial Uses

The 2019 Basin Plan also states that the State Water Board's Ocean Plan, and any revisions thereto, shall apply in their entirety to affected ocean waters of the basin. The State Water Board *2019 Water Quality Control Plan for Ocean Waters of California* (2019 Ocean Plan),⁶ Section I, *Beneficial Uses*, also lists the above 2019 Basin Plan beneficial uses, and adds, in relevant part, aesthetic enjoyment, and mariculture.⁷ These beneficial uses were potentially harmed by the unauthorized discharge to the Pacific Ocean at Goleta Beach.

General Characteristics of Untreated Wastewater that Harm or Potentially Harm the Above Water Recreation, Human Health, and Aquatic Life and Habitat Beneficial Uses

Untreated wastewater often contains feces, urine, blood, industrial wastewater, dissolved and solid metal, and organic materials. Untreated wastewater is susceptible to containing high levels of suspended solids, pathogenic organisms, toxic pollutants, nutrients, oxygen-demanding organic compounds, oil and grease, and other pollutants that can degrade water quality and impact beneficial uses. Untreated wastewater is known to cause the pollution of the receiving waters with pathogens (disease causing bacteria, viruses, and other organisms), the killing of aquatic life, and the pollution of beaches.

Included in untreated wastewater are debris such as trash that are flushed down toilets, organic material, dissolved organic material, and other contaminants such as pesticides, soaps, heavy metals, and other toxic compounds. The effects in the receiving water may include a decrease in dissolved oxygen because of the increase in bacteria that breakdown the organic waste and use up oxygen in the process. A decrease in dissolved oxygen can negatively affect aquatic species such as fish and macroinvertebrates. The release of excess nitrogen and phosphorus from the untreated wastewater during that process may also cause eutrophication (the over-enrichment of a waterbody with nutrients) and an increase in algal growth that may act further to decrease dissolved oxygen. These general characteristics of untreated domestic and municipal wastewater have the potential to harm beneficial uses related to water recreation, human health, and aquatic life and habitat, and therefore potentially harm the REC-1, REC-2, COLD, WARM, MIGR, SPWN, BIOL, RARE, EST, SHELL, WILD, COMM, MAR, and mariculture beneficial uses described above.

Beach Closure

The Central Coast Water Board received Governor's Office of Emergency Services (OES) Hazardous Material Spill Report # 24-1024 on February 21, 2024, at 5:16 PM (OES Spill Report). The Spill Report showed that Brian McCarthy from the Goleta West Sanitary District notified OES on February 17, 2024, at 5:55 PM. The initial OES Spill

⁶ See the 2019 Ocean Plan at the State Water Board's Plans and Policies website: https://www.waterboards.ca.gov/plans_policies/, under "Plans" select the "California Ocean Plan" link.

⁷ The culture of algae, plants, and animals in marine waters independent of any pollution source.

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. On February 21, 2024, and February 23, 2024, the District provided OES with additional updates of the estimated spill volume and other information. The District's most recent update estimated a total spill volume of 1,140,657 gallons, 68,961 gallons of which were recovered before reaching waters of the U.S.

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 discharge of untreated wastewater by issuing a beach closure and health warnings for the impacted area beginning on the evening of February 21, 2024.⁸ 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. According to the County Health Department, the beach closure due to the sewage discharge was in place for 23 calendar days,⁹ representing an observed significant impact involving actual chronic (e.g., more than five days) restriction on and impairment of water contact beneficial uses¹⁰ and potential impacts to human health. A score of **(5) Major** is assigned for this factor.

Factor 3: Susceptibility to Cleanup or Abatement

Factor 3 Background: The Enforcement Policy specifies assigning a factor score of (0) if the discharger cleans up 50 percent or more of the discharge within a reasonable amount of time. A score of 1 is assigned for this factor if less than 50 percent of the discharge is susceptible to cleanup or abatement, or if 50 percent or more of the discharge is susceptible to cleanup or abatement, but the discharger failed to clean up 50 percent or more of the discharge within a reasonable time. Natural attenuation of

⁸ In the event of a known release of untreated sewage into waters adjacent to a public beach, the local health officer must immediately post and close the beach until the source of the sewage release is eliminated, sample the affected waters, and continue closure or restriction until test results satisfy the bacteriological standards established under California Code of Regulations, title 17, section 7958. (California Code of Regulations, title 17, section 7961, subdivision (d); see also Health and Safety Code, section 115885, subdivision (a)(6)(7).) The local health officer in this case is the Santa Barbara County Health Department.

⁹ The Prosecution Team acknowledges that in section II.C of the District's Technical Report dated April 2, 2024, the District suggests that the County could have decided to end the beach closure due to the sewage spill as early as March 4, 2024, or after being in place over the course of 12 calendar days. Regardless, the restriction of water contact beneficial uses exceeded five days and warrants a factor of (5) Major.

¹⁰ The Prosecution Team acknowledges its consideration of other potential sources of harm to beneficial uses, such as the general characteristics of untreated wastewater and its potential harm to the other designated beneficial uses listed above. The score warranted by the actual chronic restriction on water contact beneficial uses is the maximum available and therefore as high or higher than other considerations may warrant.

discharged pollutants in the environment is not considered cleanup or abatement for purposes of evaluating this factor.

Factor 3 Consideration: The Discharger reported¹¹ an estimated total spill volume of 1,140,657 gallons with recovery of approximately 68,961 gallons of untreated wastewater before it discharged into Tecolotito Creek, Goleta Slough and its estuary, and the Pacific Ocean. The reported wastewater volume recovered was comprised of wastewater in the immediate vicinity of the failed pipeline removed by vacuum truck, water that the District contained onsite, onsite saturated soil, and the water content volume from other impacted soil removed by dump truck. However, for the purposes of this analysis, the discharge is considered the volume of untreated wastewater discharged to waters of the U.S. as reported by the District. 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. A score of **(1)** is assigned for this factor.

Step 1 Final Score – Harm or Potential Harm to Beneficial Uses

The sum of the above factor scores is **(9)**. This value is used in Step 2 as the “Potential for Harm” score.

Step 2. Assessments for Discharge Violations

Step 2 Background: The proposed administrative civil liability for the unpermitted discharge is based on a per day and per gallon liability pursuant to Water Code section 13385.

Per Gallon Assessments for Discharge Violations

The Enforcement Policy specifies that the Water Boards shall use the Potential for Harm score from Step 1 and the extent of Deviation from Requirement when determining an initial liability amount on a per gallon basis. The Deviation from Requirement reflects the extent the alleged violation deviated from the specific requirement at issue and characterizes it as minor, moderate, or major. The Potential for Harm score in Step 1 and the Deviation from Requirement determination in Step 2 are used to determine a Per Gallon Factor from Table 1 of the Enforcement Policy. The per gallon assessment is then determined by multiplying the Per Gallon Factor by the number of gallons subject to penalty and the maximum per gallon penalty amount allowed under the Water Code.

¹¹ As required by Statewide General Order Specification 5.13 and the Order's Attachment E1, the Discharger submitted its initial reports to OES, uploaded and certified its Spill Event in CIWQS, submitted its Spill Technical Report dated April 2, 2024, continued its investigation and analysis and submitted a Spill Technical Report Update dated May 17, 2024. The Prosecution Team used the latest information provided as related to each factor consideration.

Per Day Assessments for Discharge Violations

The Enforcement Policy also specifies that the Water Boards shall use the Potential for Harm score from Step 1 and the extent of Deviation from Requirement when determining an initial liability amount on a per day basis. Table 2 of the Enforcement Policy is used to determine a Per Day Factor for the alleged violation. The per day assessment is then determined by multiplying the Per Day Factor by the maximum per day amount allowed under the Water Code and number of days the violation occurred.

Step 2 Consideration:

As determined in Step 1, the Potential for Harm factor for this violation is **(9)**. The Prosecution Team determined that the Deviation from Requirement is **major**. “Major” is assigned when the requirement has been rendered ineffective in its essential functions. Water Code section 13376 and/or Clean Water Act section 301 prohibit unpermitted discharges of waste to waters of the U.S. This unpermitted discharge of untreated wastewater to waters of the U.S. renders the requirement ineffective in its essential function of protecting water quality. The Deviation from Requirement is **major**.

The Prosecution Team determined that the Per Gallon Factor from Table 1 and the Per Day Factor from Table 2 of the Enforcement Policy are each **0.80**.

Water Code section 13385, subdivision (c)(2) provides that an administrative civil liability of up to \$10 per gallon shall apply to volumes of waste discharged but not cleaned up in excess of 1,000 gallons. The volume subject to per gallon liability is 1,070,696 gallons (1,071,696 gallons minus 1,000 gallons).

Water Code section 13385, subdivision (c)(1) provides that an administrative civil liability of up to \$10,000 per day shall apply for each day of violation. The violation occurred for approximately 14 hours across two days (February 16 through 17, 2024).

High Volume Discharges

In accordance with the Enforcement Policy, the Water Boards shall apply the above Per Gallon Factor to the maximum per gallon penalty amount of \$10 per gallon. However, because the volume of certain discharges can be very high, the Water Boards may elect to use a value between \$2.00 per gallon and \$10.00 per gallon to determine the per gallon amount for discharges that are between 100,000 gallons and 2,000,000 gallons for each discharge event, whether it occurs on one or more days.

Given that the reported volume exceeds 1,000,000 gallons, the Prosecution Team determined that an assessment of \$2.00 per gallon is appropriate. Electing to use a maximum of \$2.00 per gallon for this alleged high-volume unpermitted discharge will not result in an inappropriately small administrative civil liability for this violation.

The per gallon and per day initial liability amounts, and the combined initial liability amount for the violation are as follows:

Per Gallon Liability:

$$\text{\$2/gallon} \times 1,070,696 \text{ gallons} \times 0.80 \text{ per gallon factor} = \text{\$1,713,114}$$

Per Day Liability:

$$\text{\$10,000/day} \times 1 \text{ day} \times 0.80 \text{ per day factor} = \text{\$8,000}$$

Initial Liability Amount:

$$\text{Per Gallon Liability} + \text{Per Day Liability} = \text{\$1,713,114} + \text{\$8,000} = \text{\$1,721,114}$$

Step 3. Per Day Assessment for Non-Discharge Violations

This step does not apply to a discharge violation.

Step 4. Adjustment Factors

The Enforcement Policy specifies the consideration of violator conduct using three additional factors for modification of the amount of the initial liability determined in Steps 1 through 3: the violator's culpability, the extent to which the violator voluntarily cooperated in returning to compliance including voluntary cleanup efforts, and the violator's history of violation.

Culpability Factor Background: The culpability factor addresses the violator's degree of culpability regarding the violation. Therefore, adjustment should result in a multiplier from 0.75 to 1.5, with a lower multiplier for accidental, non-negligent violations and a higher multiplier for intentional or negligent behavior. A first step to analyzing the culpability factor is to identify any performance standards related to the violation (or, in their absence, prevailing industry practices). The culpability factor then looks to what a reasonable and prudent person would have done or not done under similar circumstances.

Culpability Factor Consideration: The culpability factor for the violation is **1.0**. In the District's Spill Technical Report dated April 2, 2024, the District reported that the SSO occurred due to significant corrosion along the exterior surface of an approximately four-foot section of a 24-inch diameter force main. District staff and the District's construction consultant determined that the localized corrosion was likely due to damage to the pipe exterior during its original installation approximately 46 years ago. The damage would have broken the anti-corrosion seal of the asphaltic coating on the outside of the pipe as well as the metal surface of the pipe. Both types of damage would have left the pipe vulnerable to the corrosion observed in the failed section of pipe.

In the District's updated Spill Technical Report dated May 17, 2024, the District confirmed that the failure was caused by corrosion of the external pipe surface and added that further analysis indicated imperfect external corrosion protection and severely corrosive soils.

The District further reported that the pipe damage was on a lower portion of the pipe at a point furthest from the ground surface, and therefore would not have been caused by later activity on the ground surface above the failed pipe section. The District found the interior and exterior of the rest of the pipe on either side of the failed section to be in very good condition. The pipe is within its normal service life.

The District and its engineering consultant performed a condition assessment of the force main in 2002 and 2003 and determined the pipe to be in good operating condition at that time. The District and its engineering consultant performed another condition assessment in November 2022, and again found the pipe to be in good operating condition and based on the Statewide General Order requirements there was not a requirement to go above and beyond the condition assessment that was performed to determine condition of the pipeline.

The District also maintains an 18-inch parallel force main for redundant operations and was able to divert and limit the discharge of the spill by isolating the 24-inch force main and continuing operational wastewater flows through its backup 18-inch force main.

This information indicates that the Discharger took reasonable and prudent action within an expected standard of care to periodically assess the condition of the pipeline warranting a neutral multiplier factor of **1.0**.

Cleanup and Cooperation Factor Background: The cleanup and cooperation factor addresses the extent to which the violator voluntarily cooperated in returning to compliance and correcting environmental damage, including any voluntary cleanup efforts undertaken after a violation. Adjustment of this factor should result in a multiplier between 0.75 to 1.5, using the lower multiplier where there is exceptional cleanup and cooperation compared to what can reasonably be expected, and a higher multiplier where the response falls below what would be considered a reasonably expected response. A reasonable and prudent response to a discharge violation or timely response to a Water Board order should receive a neutral factor of 1.0 as it is assumed a reasonable amount of cooperation is the warranted baseline.

Cleanup and Cooperation Factor Consideration: No cleanup or spill recovery was conducted for the discharge to the receiving waters because the spill occurred mostly overnight prior to discovery. The Discharger cooperated in a reasonable and prudent manner to clean 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. In addition, the District and its engineering consultants continued to invest resources into further investigating and refining its analysis after it submitted its certified Spill Technical Report dated April 2, 2024. The District provided a formal update to its certified Spill Technical Report on May 17, 2024, and increased the estimated discharge volume on May 17, 2024, from 1,022,500 gallons to 1,071,696 gallons.

The District continued to periodically confirm vegetation recovery at the spill site and expanded condition assessment efforts. The District replaced and repaired several air

release valve adapters that showed mild to moderate signs of external corrosion and for instrument tracking purposes during the expanded assessment work. The District also installed deployment and retrieval infrastructure during an expanded pipe condition assessment work for improved access to assess its force mains internally and externally more frequently.

During settlement negotiations, the District made the following additional commitments to prevent future spills:

1. Completed an expanded pipe condition assessment of the 24-inch force main's integrity (inside and outside) with best available technology (BAT), using Xylem Technology's SmartBall and PipeDiver tools;
2. Updated its Sewer System Management Plan (SSMP), finalized in August 2025, to use BAT to check the force main's integrity (inside and outside) every five years initially and then on a recurring basis as reasonable and prudent, and to continue to properly fix problems/vulnerabilities identified through those inspections;
3. Identified capital improvement funds for the recurring BAT inspections and to immediately respond to and repair any force main integrity issues found during the inspections; and
4. Improved spill alarm and monitoring system to ensure timely notification of any spills from the force mains.

In May 2025, the District responded to preliminary data from the Xylem Technology assessment to remove and repair a section on the 24-inch force main that showed signs of external corrosion. The District externally inspected two preliminarily identified air pockets on its 18-inch force main, further inspecting the 24-inch force main in the same excavated locations and is completing additional soil corrosivity analyses. The District will incorporate these findings into an expanded condition assessment report. The District will use this report to inform its long-term decision to potentially rehabilitate, line, replace or realign its force mains to address highly corrosive soil conditions in the Goleta Slough and ensure prevention of future spill events from its force main operations.

Based on the considerations above, a multiplier of **0.9** is appropriate for this factor.

History of Violations Factor Background: Where there is a history of repeat violations by a Discharger, a minimum multiplier factor of 1.1 should be used. Where a discharger has no prior history of violations, this factor should be neutral, or 1.0.

History of Violations Factor Consideration: The Discharger has no recent history of violations within the last five years for which the Central Coast Water Board has taken formal enforcement action. A neutral multiplier of **1.0** is appropriate.

Step 5. Determination of Total Base Liability Amount

The Total Base Liability amount for the violation is calculated by multiplying the Initial Liability Amount by the adjustment factors for the alleged violation (Initial Liability Amount) x (Culpability) x (Cleanup/Cooperation) x (History of Violations). The applicable Total Base Liability amount for the violation is **\$1,549,002** as summarized below.

Total Base Liability Amount:

$\$1,721,114 \times 1.0 \times 0.9 \times 1.0 = \$1,549,002$ (rounded)

Step 6. Ability to Pay and Continue in Business

The Discharger's ability to pay an administrative civil liability is determined by its income (revenues minus expenses) and net worth (assets minus liabilities). The Total Base Liability amount may be adjusted to address ability to pay or to continue in business if the Central Coast Water Board has sufficient financial information necessary to assess the Discharger's ability to pay the Total Base Liability amount or to assess the effect of the Total Base Liability Amount on the Discharger's ability to continue in business. However, the Central Coast Water Board is under no obligation to ensure that a violator has the ability to pay or continue in business, rather, it is obligated to consider this potential outcome when imposing an administrative civil liability.

To assess the Discharger's ability to pay, the Prosecution Team reviewed publicly available financial information obtained from the Discharger's website as of April 10, 2024. Those documents included the *Goleta West Sanitary District Adopted Budget for Fiscal Year 2023-2024 (FY 23-24 Budget)*. The Discharger's FY 23-24 Budget indicates that the Discharger estimated an operations reserve fund (unrestricted) balance of \$3,273,746 for June 30, 2024, that may be used for any proper District purpose,¹² indicating the District's ability to pay the proposed liability.

Step 7. Other Factors as Justice May Require

The Water Boards may exercise their discretion to include some of the costs of investigation and enforcement in a total administrative civil liability. Including some staff investigation and enforcement costs is valid from an economic standpoint as it requires those who commit water quality violations to pay a greater percentage of the full costs of their violations. However, this important consideration must be balanced against the potential of discouraging a discharger from exercising its right to be heard and other important due process considerations.

The Prosecution Team spent 14 hours of staff time at \$153 per hour to investigate this case and prepare this analysis and supporting information. The Prosecution Team finds that it is appropriate to increase the Total Base Liability amount by **\$2,143** in consideration of these investigation and enforcement costs. Increasing the Total Base

¹² FY 23-24 Budget page 8, Fund Activity Table.

Liability Amount in this manner serves to create a more appropriate general and specific deterrent against future violations.

Step 8. Economic Benefit

The Prosecution Team estimates that the economic benefit of noncompliance was negligible.

Pursuant to the Enforcement Policy, the economic benefit, savings or monetary gain derived from the acts or omissions that constitute a violation, must be estimated for each violation. In cases where a violation occurred because a discharger postponed improvements or did not take other measures needed to prevent the violations, the economic benefit may be substantial. Estimating economic benefit includes consideration of actions that were necessary in the exercise of reasonable care to prevent the violation.

As stated above in the Step 4, the unpermitted discharge occurred due to damage on the exterior lining of a short, four-foot section of force main pipe during installation 46 years ago. After installation, the exterior damage was unforeseeable during two separate condition assessments performed by third-party engineering consultants in 2002 and 2022. Both engineering assessments determined that the pipeline was in good operating condition and would not benefit from relining, rehabilitation, or replacement. The District further reported that the type of force main at issue has a normal service life between 60 to 100 years. At 46 years in service, the pipe was considered within its normal service life. The District, therefore, did not postpone known improvement needs.

Based on the above circumstances, there are no distinct savings or monetary gain derived from the District's acts that constitute the violation. The economic benefit, if any, associated with this violation is negligible.

Step 9. Maximum and Minimum Liability Amounts

The Enforcement Policy states that the total liability shall be at least 10 percent higher than the economic benefit, "so that liabilities are not construed as the cost of doing business and the assessed liability provides meaningful deterrent to future violations."

The minimum liability associated with economic benefit is \$0 because the economic benefit is negligible.

Pursuant to Water Code section 13385, the maximum administrative liability amount is \$10,000 per day of violation and \$10 per gallon discharged for every gallon over 1,000 that is not cleaned up. The maximum liability amount is **\$10,716,960** as calculated below.

Maximum Per Gallon Liability Amount:

1,070,696 gallons x \$10/gallon = \$10,706,960

Maximum Per Day Liability Amount:

1 day x \$10,000/day = \$10,000

Maximum Liability Amount:

\$10,706,960 + \$10,000 = \$10,716,960

The Final Liability Amount is within the minimum and maximum liability amounts for the violation.

Step 10. Final Liability Amount

Based on the foregoing analysis, and consistent with the Enforcement Policy, the final liability amount proposed for the unpermitted discharge of untreated municipal wastewater to waters of the U.S., including staff costs, is **\$1,551,145** (\$1,549,002 + \$2,143).

ATTACHMENT B

Goleta West Sanitary District Supplemental Environmental Project (SEP) Proposal: Santa Barbara County Point of Entry (POE)/Point of Use (POU) Pilot Project

Name of Project:

Santa Barbara County Point of Entry (POE)/Point of Use (POU) Pilot Project (the “POE/POU Pilot” or “Project” or “Pilot”).

Project Applicant:

Goleta West Sanitary District
Sanitary Sewer System WDID 3SSO11465
P.O. Box 4
Santa Barbara, CA 93116-004

Contact Person, Title, Contact:

Brian McCarthy, Goleta West Sanitary District Co-General Manager
Joey Hilliard, Goleta West Sanitary District Co-General Manager
Phone: (805) 968-2617
Emails: BMcCarthy@goletawest.org; JHilliard@goletawest.org

Goleta West Sanitary District (“GWSD” or “Settling Party”) requests all communications and documents in connection with this POE/POU Pilot also be provided to counsel:

Jena Shoaf Acos
Brownstein Hyatt Farber Schreck, LLP
1021 Anacapa Street
Santa Barbara, CA 93101
Phone: (805) 882-1427
Email: JAcos@BHFS.com

Water Board Enforcement Action Number:

Stipulated Administrative Civil Liability Order R3-2025-0074 (“Stipulated Order”).

Community Special Status Category

The POE/POU Pilot prioritizes improving drinking water quality and/or quantity for eligible recipients located in Underrepresented Communities as defined and used by the Central Coast Regional Water Quality Control Board (“Central Coast Water Board”), including, but not limited to, Disadvantaged Communities, Severely Disadvantaged Communities, Economically Distressed Areas, Environmentally Disadvantaged

Communities and Fringe Communities as defined by the State Water Resources Control Board (State Water Board) (collectively, “Underrepresented Communities”).¹

According to publicly available data and confirmed with the Central Coast Water Board, significant portions of Santa Barbara County have Disadvantaged Communities and/or Severely Disadvantaged Communities, including but not limited to New Cuyama, Cuyama, Casmalia, Sisquoc, Isla Vista, and Garey, and the cities of Guadalupe, Lompoc, and Santa Maria, all of which are located in North County, except the City of Lompoc, which is located in mid-County, and the community of Isla Vista (South County).²

Project Category

The POE/POU Pilot furthers the human right to water and fits into the following two State Water Board’s Policy on Supplemental Environmental Projects, effective May 3, 2018, (“SEP Policy”) supplemental environmental project (“SEP”) categories: (1) public health and (2) other projects with environmental and/or public health benefits.³

Project Location

The POE/POU Pilot will comprise of several drinking water improvement projects for households located within Santa Barbara County, the same county in which GWSD’s February 2024 spill occurred. While the February 2024 spill did not directly impact groundwater drinking water supplies, GWSD is strongly aligned with the Central Coast Water Board’s drinking water replacement and treatment priorities and benefiting Underrepresented Communities in Santa Barbara County. Eligible participant households in Underrepresented Communities in Santa Barbara County will be identified in Phase 1 of the POE/POU Pilot through existing and additional groundwater quality monitoring efforts that otherwise lack treatment or other water quality improvement efforts. The list of participating households will be provided to the Central Coast Water Board through quarterly reporting. Where feasible with reporting requirements, specific locations will be obscured and otherwise identifying information will not be provided to protect participants’ anonymity and address barriers to participation.

¹ Definitions of “Disadvantaged Community,” “Severely Disadvantaged Community,” “Economically Distressed Area,” “Tribes,” “Environmentally Disadvantaged Communities,” and “Fringe Communities” are available at:

https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2025/jun/item09_att3.pdf.

² See the 2019 Update to the Santa Barbara County Integrated Regional Water Management Plan, pp. 152-153, available at: <https://content.civicplus.com/api/assets/89d60832-8fd8-47ae-b7e8-787ad1253820>. See also, California S.B. 535 Disadvantaged Communities (2022 Update) (includes a few additional Disadvantaged Communities within Santa Barbara County, including federally recognized tribal areas as identified by the Census in the 2021 American Indian Areas Related National Geodatabase, designated by CalEPA for the purpose of S.B. 535 and with CalEnviroScreen 4.0 data); available at: <https://calepa.ca.gov/envjustice/ghginvest/>.

³ SEP Policy, pp. 5-7, available at:

https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/seps/20180503_sep_policy_amd.pdf.

Regional Water Board's SEP Priorities

The POE/POU Pilot furthers the Central Coast Water Board's settlement priorities by implementing several water quality improvement projects to (1) advance the human right to water and (2) provide water quality benefits to Underrepresented Communities.

First, this POE/POU Pilot will improve local access to safe drinking water by providing replacement water and installing water treatment systems to impaired domestic wells⁴ and state small water systems.⁵ Eligible households will be identified through the development and implementation of a focused community outreach plan regarding drinking water quality, as detailed herein.

Second, the POE/POU Pilot will improve drinking water quality for Underrepresented Communities by identifying eligible households located within Underrepresented Communities for the initial community outreach and water quality monitoring. Subsequent phases of this POE/POU Pilot include replacement water deliveries and/or installation of point of use or point of entry treatment systems, as well as operation and maintenance training, to address and improve drinking water quality for the impacted household users in Underrepresented Communities.

Additionally, the POE/POU Pilot also supports the Central Coast Water Board's broader mission:

[T]o preserve, enhance and restore the quality of California's water resources and drinking for the protection of the environment, public health, and all beneficial uses and to ensure proper resource allocation and efficient use, for the benefit of present and future generations.⁶

For the current fiscal year, the Central Coast Water Board identifies one of its historical values to

*focus on environmental justice through the development of strategies to identify and address water quality related issues impacting underrepresented and disadvantaged communities in the Central Coast Region.*⁷

⁴ "Domestic well" means "a groundwater well used to supply water for the domestic needs of an individual residence or a water system that is not a public water system and that has no more than four service connections." (Health & Saf. Code, § 116681, subd. (g).)

⁵ "State small water system" means "a system for the provision of piped water to the public for human consumption that serves at least five, but not more than 14, service connections and does not regularly serve drinking water to more than an average of 25 individuals daily for more than 60 days out of the year." (Health & Saf. Code, § 116275, subd. (n).)

⁶ Central Coast Water Board Strategic Plan – Fiscal Year 24-25, p. 1, *available at*: https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2024/oct/item20_att1.pdf.

⁷ *Id.*, at pp. 5-6.

This includes the primary focus on “implementing the state’s human right to water policy and associated State Water Board and Central Coast Water Board resolutions.”⁸ The Central Coast Water Board has strategically leveraged community partners’ work to improve the human right to water.

The POE/POU Pilot will leverage community monitoring work completed through the Bay Foundation of Morro Bay’s Central Coast Drinking Water Well Testing Program. The Central Coast Drinking Water Well Testing Program, a discretionary program that was separately authorized to also receive SEP funding through State Water Board Resolution 2024-0022, has identified through initial monitoring work certain private domestic and small water system drinking water wells with water that is unsafe to drink per applicable drinking water standards. The Central Coast Drinking Water Well Testing Program does not currently address treatment.

The POE/POU Pilot will build on existing water quality testing data, completing additional well testing to identify and provide vulnerable households in Underrepresented Communities with safe drinking water through replacement bottled water and household treatment. The POE/POU Pilot thereby directly supports the Central Coast Water Board’s priorities.

SEP Description

According to the Central Coast Drinking Water Well Testing Program, more than “90 percent of the Central Coast region’s population depends on groundwater as the only drinking water source.”⁹ Throughout the Central Coast region there are households in Underrepresented Communities that rely upon contaminated groundwater for drinking water. The intent of the POE/POU Pilot is to ensure access to safe drinking water through providing replacement water and treatment systems where groundwater does not meet safe drinking water standards. As a pilot, the deliverables will include documentation of lessons learned and GWSD hopes the Central Coast Water Board and other interested parties can use the phases of this SEP and lessons learned to design and implement additional safe drinking water projects throughout the region and California.¹⁰

⁸ *Ibid*; see also, State Water Board Resolution No. 2016-0010, *available at*: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2016/rs2016_0010.pdf; Central Coast Water Board, Human Right to Water Resolution No. R3-2017-0004, *available at*: https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2017/2017-0004_hrtw_fnl.pdf.

⁹ Central Coast Water Board, Bay Foundation’s Central Coast Drinking Water Well Testing Program Use of SEP Funds (updated Aug. 2, 2024) (approximately 48 percent of wells sampled do not meet safe drinking water standards and most commonly for nitrate and arsenic), *available at*: https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2024/summary-drinking-water-well-testing-sep.pdf ; see also, Regional Board Strategic Plan – Fiscal Year 24-25, *supra*, pp. 32-33 (concur with Central Coast Ambient Monitoring Program – Groundwater Assessment and Protection Program (CCAMP-GAP) findings).

¹⁰ While new technology development(s) are not anticipated for successful implementation of this POE/POU Pilot, Stantec understands that any new technology development will be open source.

GWSD will partner with project administrator and implementer, Stantec Consulting Services, Inc. (“Stantec”), for completion of the POE/POU Pilot. Stantec has extensive experience administering and implementing drinking water improvement programs throughout California, works closely with the State Water Board’s Safe and Affordable Funding for Equity and Resilience (“SAFER”) program, and provides GWSD with reliable and cost-effective relationships with local subcontractors and community organizations for a timely and efficient SEP.

Phase 1 of the POE/POU Pilot will occur during the first year of the SEP. Phase 1 will focus on identifying drinking water wells serving Underrepresented Communities within Santa Barbara County in need of interim replacement drinking water deliveries and water treatment solutions. GWSD will work with Stantec to evaluate priority wells identified through the State Water Board’s online database—Groundwater Ambient Monitoring and Assessment (GAMA) Program Groundwater Information System (GAMA GIS)¹¹, the Bay Foundation of Morro Bay’s Central Coast Drinking Water Well Testing Program¹², the Community Water Center’s outreach efforts¹³, the Rural Community Assistance Corporation’s well assessment program¹⁴, Santa Barbara County’s Department of Public Health monitoring and Department of Environmental Health well permitting activities¹⁵, County of Santa Barbara Integrated Regional Water Management Program (IRWMP)¹⁶, Santa Barbara County Groundwater Sustainability Agencies (GSAs)¹⁷, outreach to local consultants who provide operations and maintenance services to small water systems and domestic well owners (e.g., Fluid Resource Management) and through its own community engagement and well monitoring within Santa Barbara County for inclusion. The POE/POU Pilot conservatively assumes Stantec will need to engage and test most wells for inclusion without duplicating these other monitoring efforts.

More specifically, Stantec will evaluate existing well water quality datasets from the above-mentioned sampling programs for impaired, eligible wells. Stantec will then oversee independent field sampling and analysis of the initially identified impaired wells where not unnecessarily duplicative, to collect all analytes being evaluated in this POE/POU Pilot. Stantec will engage with a community engagement program to conduct community outreach to identify and sample additional eligible wells in Underrepresented Communities in Santa Barbara County not already participating in other sampling programs and to confirm POE/POU Pilot participants. Stantec will prioritize impaired, eligible wells that can be improved with point of entry or point of use treatment at a reasonable cost so as to afford maximum benefit—defined as the maximum number of

¹¹ See, <https://www.waterboards.ca.gov/gama/gama-gis.html>.

¹² See, <https://sites.google.com/view/ccgroundwater>.

¹³ See, <https://www.communitywatercenter.org/>.

¹⁴ See, https://www.events.rcac.org/Forms.asp?MODE=NEW&Forms_FormTypeID=-2718.

¹⁵ See, <https://www.countyofsb.org/2277/Water-Wells-Drinking-Water>.

¹⁶ See, <https://www.countyofsb.org/2417/Integrated-Regional-Water-Management-Pro>.

¹⁷ See, <https://www.countyofsb.org/2334/Groundwater-Sustainability-Agencies>.

households that can benefit from treatment—within the budget of the SEP. More detail provided below in **Section 10(a)**.

Phase 2 and 3 of the POE/POU Pilot will involve design and implementation of appropriate point of entry and point of use treatment systems with monitoring and maintenance to ensure success of the SEP at the conclusion of 4 years. Stantec will oversee system performance, conduct routine maintenance, and facilitate public outreach and education to support long-term effectiveness and community engagement.

To ensure immediate access to safe drinking water, any impaired well identified in Phase 1 will receive bottled replacement drinking water either for the duration of the SEP, or until applicable point of entry or point of use treatment system is installed and operational. For wells receiving treatment, replacement drinking water will be provided until the POE/POU treatment systems are operational. This is a POE/POU Pilot, though, and the goal is to confer maximum benefit through treatment rather than just through temporary replacement water. Replacement water will be provided when point of entry and point of use treatment are infeasible due to source water quality, technological, or other barriers.

The POE/POU Pilot is a new initiative that has not been previously committed to under any existing federal or state funding agreements, contracts, or grants. It is not expected to generate profit for GWSD and does not involve the provision of raw materials without a commitment to complete the full POE/POU Pilot.

The POE/POU Pilot represents a complete and discrete set of actions with tangible water-related environmental and public health benefits. Its successful completion does not depend on any third-party actions outside of those contracted or hired by GWSD, nor does it include activities legally required of any third party. The POE/POU Pilot is not part of any existing settlement, legal order, or regulatory requirement, and does not merely implement standard industry practices. To the best of the GWSD's knowledge, the POE/POU Pilot does not provide any direct financial benefit to State or Central Coast Water Board members, staff, or their families beyond what is available to the public generally.

The POE/POU Pilot has been structured to improve access to safe drinking water in Underrepresented Communities in Santa Barbara County. This POE/POU Pilot is further intended to provide the Central Coast Water Board and local subcontracting organizations and entities a blueprint for targeting and expanding protection and treatment of drinking water quality to benefit drinking water sources in the Central Coast region.

Scope of Work

The POE/POU Pilot is expected to occur over forty-eight (48) months in order to cover four semi-concurrent phases of work: (1) Community Engagement, Well Identification and Testing, and Household Prioritization; (2) POE/POU Design and Construction; (3) Operation, Maintenance and Monitoring; and, (4) Conclusion of POE/POU Pilot. A "Participant" is a domestic well or state small water system owner, and user if different

than owner, who is willing to enroll in the POE/POU Pilot. Phases 3 and 4 will include Participant surveys to identify educational gaps and design Phase 4 outreach to support assignment decisions rather than decommissioning as much as practical, along with compilation of a lessons learned document.

Implementation of the POE/POU Pilot will begin immediately upon the Central Coast Water Board's adoption of the Stipulated Order which authorizes the POE/POU Pilot as a SEP. GWSD will contract with Stantec to serve as administrator and implementer of the POE/POU Pilot.

Phase 1: Community Engagement, Well Identification and Testing, and Household Prioritization (within first 12 months of Stipulated Order's effective date)

As explained in detail below, Phase 1 will include, at a minimum: community engagement with Underrepresented Communities in Santa Barbara County on the POE/POU Pilot; initial domestic drinking water well or state small water system (collectively, "Wells") sampling of approximately 100 Participant households until approximately 30 Participant households served by impaired Wells are identified, on a rolling basis, and prioritized for POE/POU treatment or replacement water; second round of sampling at prioritized Wells; and additional households will then be identified for treatment or replacement water as the SEP budget allows.

To ensure a thorough and community-informed approach, Stantec intends to contract with the Children and Family Resource Services (CFRS), a registered 501(c)(3) nonprofit, in order to work with Santa Barbara County Promotores Network ("Promotores") staff to develop community outreach materials available in English and Spanish.¹⁸ If the Santa Barbara County Promotores Network is not able to participate in the SEP, Stantec will identify and contract with community-based organization partners that can act in a similar capacity. Stantec will provide the Promotores staff training on the POE/POU Pilot and the Promotores will use the developed materials and training to engage with households, in English and/or Spanish, that are identified in Underrepresented Communities in Santa Barbara County, served by Wells, to help identify Wells for sampling and potential Participant households.¹⁹

Concurrently, Stantec will evaluate the Central Coast's Drinking Water Well Testing Program results, and other available Santa Barbara County drinking water well testing

¹⁸ The Promotores include over 200 members county-wide who work with the County to promote healthy communities through culturally informed outreach and peer-to-peer education. The Promotores speak English and Spanish, and some also speak Mixteco and Nahuatl. See more at: <https://www.sbceo.org/cfrs/promotores>.

¹⁹ Stantec will flag Wells that could be potentially served by a nearby public water supplier through service area expansion for further communications through Promotores of the potential alternative drinking water source. This POE/POU Pilot will not include efforts to connect to local public water supply systems and Stantec may consider proximity to an existing public water supplier to lower the Well's priority during prioritization evaluation in favor of Wells located farther away from existing public water service areas, where budget is a concern. This is not a disqualifying factor, though, as service expansion may be uncertain.

results, for previously identified impaired Wells to be included in the POE/POU Pilot. Stantec initially plans to sample all identified impaired Wells as necessary and where not unnecessarily duplicative of other sampling efforts. For example, the POE/POU Pilot will initially include bacteriological parameters, but existing data may lack bacteriological analyses and results that are otherwise required for POE/POU Pilot implementation. Stantec also anticipates identifying additional Wells with users willing to participate in the Pilot that are not already participating in a sampling program or project.

The collaborative communication and outreach step ensures that the testing effort reflects community knowledge and concerns, as well as appropriate well identification and expert analyses. Once Wells are identified, Stantec and subcontractors will confirm the scope of analytes, applicable testing methods, and proceed with collecting water samples from the Wells for state-certified laboratory analysis. Before collecting any water samples from Wells, Stantec will share its sampling plan(s) for the POE/POU Pilot and have at least one meeting with staff from the Central Coast Water Board, State Water Board Division of Drinking Water, and Santa Barbara County Department of Environmental Health to discuss the Pilot and coordinate as needed. The Central Coast Water Board Contact identified in Section III, paragraph 5 of the Stipulated Order will be Stantec's point of contact for scheduling the regulatory staff meeting and distributing the sampling plan(s).

Parameters for the first round of POE/POU Pilot sampling will include the parameters listed in **Table 1** ("SEP Initial Well Sampling Parameters").

Table 1. SEP Initial Well Sampling Parameters

Potential Constituent of Concern		Method	Estimated Analysis Cost per Sample
1	1,2,3-Trichloropropane (1,2,3-TCP)*	EPA 524.3	\$160.00
2	Arsenic (Total) (As)*		\$30.00
3	Nitrate as N (NO ₃ N)*	EPA 300.0	\$20.00
4	Perchlorate (PCATE)*	EPA 314.0	\$50.00
5	Chromium, Hexavalent 6 (CR6)*	EPA 218.6	\$100.00
6	pH*	SM 4500H+-B	\$15.00
7	Specific Conductance (SC)*		
8	Total Dissolved Solids (TDS)*	SM 2540C	\$30
9	Alkalinity (Total) (Alk)*	SM 2320B	\$25.00
10	Potassium (K)*		
11	Magnesium (Mg)*	EPA 200.8	\$15.00
12	Calcium (Ca)*	EPA 200.7	\$15.00
13	Sodium (Na)*		
14	Chloride (Cl)*	EPA 300.0	\$20.00
15	Sulfate (SO ₄)*	EPA 300.0	\$20.00
16	Carbonate as CO ₃ (CO ₃)*		
17	Hydroxide (OH)*		
18	Bicarbonate as HCO ₃ (HCO ₃)*		
19	Total coliform and E. coli	SM 92223B	\$63.00

Potential Constituent of Concern		Method	Estimated Analysis Cost per Sample
20	Cis-1,2 Dichloroethylene (DCE12C)	EPA 624.1	\$150.00
21	Trichloroethene (TCE)	EPA 624.1	Included in VOC package (Parameter #20)
22	Vinyl Chloride (VC)	EPA 624.1	Included in VOC package (Parameter #20)
23	Benzene (BZ)	EPA 624.1	Included in VOC package (Parameter #20)
24	Lead (PB)	EPA 200.0	\$15.00
25	Nickle (NI)	EPA 200.8	\$15.00
26	Aluminum (AI)	EPA 200.8	\$15.00
27	Selenium (SE)	EPA 200.8	\$15.00
28	Fluoride (F)	EPA 300.0	\$20.00
29	Total PFAS (PFOA, PFHXSA)	EPA 537.1	\$350.00

* Parameters are also analyzed by the Central Coast Drinking Water Well Testing Program, ensuring monitoring data from this Pilot can readily inform and improve existing monitoring projects and programs and support long-term trend monitoring.

Parameter numbers 20 through 29 in **Table 1** are included based on publicly available data from the State Water Board's 2025 Aquifer Risk Map²⁰, focusing on contaminants of concern with the highest number of MCL exceedances in Santa Barbara County. This is a localized approach that was chosen to ensure the sampling effort reflects the most relevant environmental health concerns for this SEP.

The Aquifer Risk Map provides data on MCL exceedances with a unique section identifier (MTRS), for a square mile section. Each MTRS can represent several domestic wells located in the identified square mile section. Parameters 20 (cis-1,2-Dichloroethylene) and 29 (Total PFAS) are included in Round 1 sampling because these parameters have shown significant exceedance rates in Santa Barbara County and are in the top five most common contaminants in Santa Barbara County groundwater. These exceedance counts suggest that otherwise excluding these constituents from Round 1 sampling could result in missing key water quality issues specific to Santa Barbara County.

Regarding parameter number 20 (cis-1,2-Dichloroethylene), this is analyzed with testing method EPA Method 624.1 that also tests for parameter numbers 21 through 23 (trichloroethene (TCE), vinyl chloride, and benzene) at the same time. This is a \$150 test for all four parameters. Combined, these four constituents account for over 100 MTRS sections that showed MCL exceedances in Santa Barbara County in the 2025

²⁰ See, State Water Board's 2025 Aquifer Risk Map Methodology, *available at*: https://www.waterboards.ca.gov/water_issues/programs/gama/docs/armmethods25.pdf.

Aquifer Risk Map, making this test highly cost-effective relative to its coverage of contaminants of concern.

Parameter numbers 24 through 28 (lead, nickel, aluminum, selenium, and fluoride) are included in Round 1 sampling because they are present often enough in drinking water samples, including in the 2025 Aquifer Risk Map for Santa Barbara County, and the analysis for these parameters is relatively low cost to include.

Initial sampling may include more than one site visit for water testing of the parameters included in Table 1 Initial well sampling will inform which Wells have an exceedance of State Public Drinking Water Standards and/or U.S. EPA National Primary Drinking Water Requirements which warrants treatment and/or replacement bottled water, and begins to inform point of entry and/or point of use treatment components required to serve connected households and outreach and engagement of Participants for Phases 2 through 4 of the POE/POU Pilot.

Stantec and GWSD assume approximately 100 households will be included in initial sampling effort. Based on publicly available data, GWSD and Stantec understand that at least over 1,000 households are served by Wells in Santa Barbara County. A substantial subset of these households are within Underrepresented Communities and may be interested to be Participants in this Pilot.

Stantec intends to coordinate iterative communications with identified households served by Wells eligible to receive POE/POU Pilot support through the Promotores, or alternatively with a community-based organization partner that can act in a similar capacity if the Promotores are unable to participate in the SEP. Based on known regional groundwater issues, GWSD and Stantec anticipate nitrate, arsenic, and occasional bacteriological issues, as well as additional exceedances of applicable State Public Drinking Water Standards and U.S. EPA National Primary Drinking Water Requirements, will be found in approximately 40 percent of the Wells sampled in this POE/POU Pilot.²¹

Stantec will perform a second round of sampling at Wells prioritized for POE/POU treatment to characterize the parameters that impact treatment technology choice, sizing of systems, and maintenance costs for POE/POU treatment. This second round of follow up sampling will include the parameters listed in **Table 2** (“SEP Follow Up Well Sampling Parameters”).

²¹ This approximate rate is informed by the Bay Foundation of Morro Bay's Central Coast Drinking Water Well Testing Program testing to date throughout the Central Coast region.

Table 2. SEP Follow Up Well Sampling Parameters

Potential Constituent of Concern		Method	Estimated Analysis Cost per Sample
1	Arsenic (III)	EPA 200.8	\$200.00
2	Arsenic (V)	EPA 200.8	Included with Arsenic (III) (Parameter #1)
3	Total Chromium (CD)	EPA 200.8	\$15.00
4	pH	SM 4500H+-B	\$15.00
5	Temperature	Field Measure	
6	Total Dissolved Solids (TDS)	SM 2540C	\$30.00
7	Total Organic Carbon (TOC)	SM 5310B	\$50.00
8	Turbidity	EPA 180.1	\$25.00
9	Magnesium (Mg)	EPA 200.8	\$15.00
10	Silica as SiO ₂	EPA 200.7	\$15.00
11	Phosphate	EPA 365.3	\$45.00
12	Calcium (Ca)	EPA 200.7	\$15.00
13	Free Available Chlorine	SM 4500Cl-G	\$30.00
14	Sulfate (SO ₄)	EPA 300.0	\$20.00
15	Chloride (Cl)	EPA 300.0	\$20.00
16	Alkalinity as CaCO ₃ (CO ₃)	SM 2320B	\$25.00
	Metals Digestion Fee		\$15.00

All Participant households will be updated of sampling results through the Promotores. Households with exceedances will be provided information about the health risks associated with drinking and/or bathing with well water. Stantec will coordinate providing relevant information about bacteriological contamination with the Santa Barbara County Department of Environmental Health, as well as any potentially applicable local or state notice of contamination requirements. Households connected to a Well with no exceedance will be informed and removed from the POE/POU Pilot. Stantec will also upload well testing results to the State Water Board's GeoTracker database to increase the public's availability to groundwater quality data and provide opportunities to integrate and build on existing monitoring databases/knowledge of groundwater quality conditions.²²

Stantec will evaluate and recommend prioritized impaired Wells for treatment for GWSD's concurrence as the Well sampling data becomes available, and on a rolling basis until approximately 30 Participant households served by impaired Wells are identified to be either prioritized for treatment or replacement water and then additional households as the SEP budget allows for additional Wells to be prioritized. The Participant households served by impaired Wells but not prioritized for treatment because of barriers in implementing point of entry and/or point of use treatment will

²² Data sharing will be communicated to potential Participants as part of the initial well sampling outreach and GWSD and Stantec note that data sharing may be a deterrent to some households.

receive replacement drinking water for the duration of the SEP. Stantec will focus initial outreach and sampling in Underrepresented Communities. If 30 Participant households served by impaired Wells are not identified through outreach and sampling in Underrepresented Communities, Stantec will assess whether additional geographies should be included, and will confirm the list of prioritized Wells through SEP reporting.

The prioritization process will aim to maximize the number of households prioritized to receive treatment, and thereby the number of individuals in Underrepresented Communities in Santa Barbara County benefitting from improved drinking water quality through point of entry or point of use treatment. Careful consideration is required to also ensure households with impairments that exceed the budget of this SEP are not left without replacement water or information on replacement water resources as available.

To accomplish the goal of maximizing the number of households to benefit from treatment, Stantec and GWSD will prioritize Wells that will benefit from cost effective treatment. If necessary treatment at a Well would cost a disproportionate share of the SEP's total budget, limiting the total number of households that will benefit from the SEP, the Well will not be included in the POE/POU Pilot. Specifically, a Well will not be included for treatment if more than one point of entry and/or point of use treatment device is needed for treatment. Instead, that household will receive replacement bottled water.

Stantec will implement early outreach and sampling of state small water systems within Underrepresented Communities in coordination with Santa Barbara County Environmental Health, alongside sampling of domestic wells.

The working assumption is that the POE/POU Pilot budget can be maximized to benefit the most number of households through treatment through including state small water systems in this POE/POU Pilot. Outreach with state small water systems can be more cost-efficient and less sampling is required across fewer site visits to benefit more households connected to the impaired state small water system well as compared to domestic wells.

Additional assumptions:

- The SEP budget can support a limited number of site inspections and minor rehabilitation of Wells with biological contamination. Some rehabilitation may include simple non-treatment methods with outreach support.
- The SEP budget can support certified point of entry and/or point of use treatment, but not more complicated interventions. Specifically, a Well will not be included for treatment if more than one point of entry and/or point of use treatment device is needed for treatment. Where there is not an NSF/ANSI certified device available to treat a contaminant present, but there is otherwise a well-established and not cost-prohibitive technology to treat for that contaminant, Stantec will work with its local implementation partner to provide a custom design.
- State small water systems in the County serve an average of approximately 5 households for budget estimation purposes.

- Because impaired state small water system Wells serve more households and thus one impaired state small water system Well adds several households needing replacement water and/or treatment, no more than three state small water systems will be included in initial outreach.
- The SEP budget estimates in subsequent POE/POU Pilot phases up to 30 months of operations, maintenance and follow up monitoring for Wells that receive treatment and approximately 32 months of replacement water deliveries for households connected to contaminated Wells not receiving treatment.

As discussed above, Stantec will conduct sampling until approximately 30 Participant households served by impaired Wells are identified. At this point, Stantec will identify relevant solutions to each household's water quality issue, prioritizing treatment where there is an NSF/ANSI certified point of entry and/or point of use system to remove the contaminant(s) of concern (or where a custom design for a well-established treatment technology is not cost prohibitive), and otherwise provide replacement bottled water. Stantec will estimate cost of each Participant household's relevant intervention over the course of the SEP. If the total projected costs are less than 90% of the SEP budget, Stantec will estimate how many additional Wells can be included in sampling and in the POE/POU Pilot assuming similar rates of water quality issues, and will conduct additional outreach to sample additional Wells up to the estimated SEP budget. Stantec will evaluate projected budget quarterly to assess whether additional Wells can be included in the Pilot.

The SEP budget reserves funds for limited site inspections and minor rehabilitation at domestic wells with identified biological contamination. Biological contamination may be fully addressed in some cases with inspection and non-treatment intervention (*i.e.*, adequately covering water storage, shock disinfection of the Well). Some Wells with biological contamination may need major rehabilitation (*e.g.*, repair of a Well's sanitary seal) outside of the scope of the POE/POU Pilot, in which case Stantec would provide the Participant households with replacement bottled water over the course of the SEP, and would provide the Participants with high-level information on how to address the water quality issue outside of SEP support. Stantec will continue to identify Wells with bacteriological exceedances that cannot be treated without more extensive intervention and provide the connected Participant households with replacement bottled water.

Prioritization will be an iterative process, intended to include a mix of state small water systems and domestic wells. Prioritization factors include:

- When a Well is sampled and a non-bacterial exceedance is identified, Stantec will evaluate whether the Well can be treated with a NSF/ANSI, certified point of entry and/or point of use treatment system that does not exceed \$10,000 for initial installation. If so, the Well is included. If not, Stantec will proceed to evaluate the following criteria on whether to exclude the Well:
- If the sampled Well has an identified bacteriological exceedance, Stantec will determine whether the bacteriological contamination is caused by a damaged sanitary seal or other cost-prohibitive issues, thereby disqualifying the Well from POE/POU Pilot inclusion. It is assumed bacteriological exceedances will materially increase overall complexity and potentially the costs of treatment regardless. If,

however, the bacteriological exceedance can be managed with low-cost mitigation, such as disinfection of the Well or a storage tank, or if a disinfection treatment device is appropriate, then the Well may be included in the POE/POU Pilot. If low-cost intervention can address contamination, the intervention will be covered by the POE/POU Pilot. If a disinfection treatment device is appropriate, the Well will be included in the POE/POU Pilot. However, if the contamination is due to a cost-prohibitive issue, the Well would not qualify for the POE/POU Pilot and would instead be provided replacement water for the duration of the SEP.

- If a Well's contamination would require construction of an entirely new well to adequately address exceedances of sampled contaminants, that Well cannot be included in the POE/POU Pilot for treatment and the connected Participant household(s) would be provided with replacement bottled water for the duration of the SEP.
- Wells will be prioritized and included in this SEP as sampling is completed and the budget and prioritization goals listed above are met. In the event the SEP budget will only allow for one more Well to be included but multiple Wells are simultaneously sampled and exceedances are identified, Stantec will evaluate the Wells as follows:
 - If, all else equal, Stantec must prioritize between two Wells, Stantec will prioritize the Well that will benefit from NSF/ANSI certified treatment device(s) over the Well that requires uncertified treatment device(s).
 - If, all else equal, Stantec must prioritize between two Wells that require different treatment solutions, and both solutions are NSF/ANSI certified, Stantec will recommend inclusion of the Well requiring less expensive long-term maintenance and operation to reduce financial burdens on the benefitting household(s) and increase likelihood of the household(s) maintaining operation of the installed treatment.
 - If, all else equal, and able to be included within the SEP budget, Stantec must prioritize between an impaired domestic drinking water Well and an impaired state small water system, Stantec will recommend inclusion of the small water system, assuming a slight increase in cost from scaling the treatment for a small system is less than the cost efficiencies gained by treating a greater number of households.
- Prioritization will continue on a rolling basis as impaired Wells are identified through sampling, and the SEP budget can cover the anticipated costs of treatment through the remaining phases of this SEP. The Promotores outreach will include encouragement for households to participate in sampling early for an opportunity to be prioritized for treatment as part of this POE/POU Pilot before the budget is exhausted.

Stantec will proceed with Phase 2 for each prioritized Well as each Well is prioritized during the first 12 months of SEP implementation and as the Phase 1 budget allows. Each Well will be treated as a standalone project eligible for partial suspended liability and offset at completion of the POE/POU Pilot. Updates on the locations, impairments, and prioritized Well decisions will be included in quarterly SEP reporting to the Central Coast Water Board. Any unexpected issues with contaminants of concern or treatment

costs will also be documented in a lessons learned document, detailed below in Phase 3 and 4, to help inform future drinking water projects in the region and beyond.

Phase 2: POE/POU Design and Construction (within first 18 to 24 months of Stipulated Order's effective date and in conjunction with Phase 1)

The SEP anticipates approximately 40 percent of the Wells sampled in Round 1 (see **Table 1**) having impairments identified in Phase 1. Participant households served by impaired Wells but not prioritized for treatment, based on the criteria described in the Phase 1 description above, will receive replacement drinking water for the duration of the SEP.

Stantec will coordinate replacement water deliveries through cost-effective local or regional vendor(s) who can service the recipient households — most likely Culligan, hereinafter referred to as the local implementation partner. Stantec estimates the typical household averages consumption of approximately 50-60 gallons of drinking water per month. The SEP initially anticipates approximately 20 to 30 households connected to prioritized Wells will require replacement water either for approximately 6 months while treatment is designed and installed or for the duration of the SEP if treatment is not included for the Well. The actual number of Participants will be confirmed through quarterly SEP reporting.

In parallel, Stantec will design POE/POU Pilot treatment plans for each priority Well, providing a longer-term solution tailored to the specific needs of each Well and connected household(s). Treatment will use best available technology or treatment devices and methods approved as effective for addressing the drinking water quality exceedances identified in Phase 1 sampling. Updates on the point of entry and/or point of use treatment design plans will be provided to the Central Coast Water Board in quarterly SEP reporting to the Central Coast Water Board as available. Design and cost issues will be tracked for lessons learned.

To support implementation, Stantec will identify all necessary permitting requirements for the treatment of the priority Wells on a project-by-project basis. Additionally, Stantec will coordinate with the Promotores to execute access agreements to facilitate installation and maintenance of POE/POU treatment systems on private properties, ensuring implementation of Phase 2 moves forward efficiently and with community knowledge and cooperation.

Once permits and access agreements are secured for each priority Well, Stantec will move forward with installing the respective, appropriate POE/POU treatment system.

Stantec intends to complete prioritized Well treatment installations by approximately eighteen (18) months from the Stipulated Order's effective date, unless significant delays are encountered due to household participation challenges, permitting issues, or device backorders. Stantec will continue to evaluate the need for additional sampling and treatment to address any newly identified or emerging concerns within each project as the SEP budget allows.

Throughout Phase 2, Stantec will continue to re-evaluate financial resources for including additional priority Wells in the POE/POU Pilot treatment. This SEP provides for at least twenty-four (24) months of operation, maintenance and monitoring in Phase 3, requiring all priority Wells to receive installed treatment and complete Phase 2 within the first twenty-four (24) months of the SEP. GWSD and Stantec will continue to consider financial capacity to fund additional treatment systems after the first two years where appropriate to ensure proper operation of the installed treatment and to maximize households benefitted by treatment through the POE/POU Pilot. Updates on the projects and/or any additional priority Wells will be reported to the Central Coast Water Board in quarterly SEP reporting.

Phase 3: Operation, Maintenance and Monitoring (initiated within first 18 months of Stipulated Order's effective date and after installation of each POE/POU system in Phase 2)

As Stantec facilitates installation of the appropriate POE/POU treatment systems at each priority Well, Phase 3 begins. Phase 3 is designed to run concurrently with Phase 2, on a project-by-project basis, as each treatment system becomes operational. Phase 3 (treatment operation and maintenance) is designed to include at least twenty-four (24) and up to thirty-two (32) months of operation, maintenance, and monitoring support and oversight by Stantec and its subcontractors.

Stantec will create a comprehensive Maintenance, Monitoring, and Public Outreach ("MMPO") program informed by the Promotores and the local implementation partner. The MMPO program and updates will be provided to the Central Coast Water Board through quarterly SEP reporting, as available, and unless otherwise requested by the Central Coast Water Board for consideration prior to implementation.

As each priority Well's treatment is brought into operation, Stantec will oversee implementation of the MMPO program. Maintenance will include changing filters or other media, as appropriate.

Stantec will monitor the water quality of each treated priority Well twice annually, at least 4 times during Phase 3, to test for the drinking water parameters exceeded during Phase 1. (See **Tables 1** and **2**). Stantec will evaluate the results against relevant drinking water standards to confirm treatment is properly functioning to address exceedances and provide safe drinking water to the connected household(s). Stantec will refresh initial training with the Promotores on communicating key drinking water quality information to participating households and the Promotores will provide the participating households with the water quality sampling results in English and Spanish with Stantec's guidance and support.

If results show a drinking water exceedance, Stantec will implement additional sampling as required. In this instance, Stantec will investigate and facilitate repairs or installation of replacement treatment components as necessary, providing replacement water to the impacted household(s) through Culligan while treatment is offline. If a continuing treatment issue is identified that cannot be resolved with initial repairs and otherwise indicates a more expensive or incurable issue with the Well, Stantec will recommend

the Well be excluded from additional treatment through the POE/POU Pilot. When a Well is excluded due to an identified issue after attempted repairs, Stantec will guide communications between the Promotores and the impacted household(s), decommission the system, and provide the impacted household(s) with replacement water for the remainder of the SEP term in lieu of treatment. Stantec will evaluate whether the decommissioned components would work if reinstalled at another prioritized Well, as appropriate, or will otherwise prioritize a new Well that can be treated with installation of the removed treatment components within the remaining SEP budget and duration. It is assumed any media used in the decommissioned system will have to be disposed of; assessment of adding of a new Well in the event a Well has to be excluded during Phase 3 would require the budget for additional media and other treatment components that cannot be reinstalled.

The MMPO will also include the development and distribution of an annual household survey to understand participating water users' experiences and to improve Phase 3 public outreach to increase likelihood of participating households opting to continue to operate and maintain the installed treatment beyond the SEP duration. This survey will also provide a sense of how many households may opt for decommissioning, allowing Stantec to refine the Phase 4 budget and potentially consider adding a new Well for treatment, depending on whether there is sufficient time remaining to complete installation and evaluate the operation and maintenance of the added system.

Phase 4: Conclusion of POE/POU Pilot

After up to thirty-two months (32) of treatment operation, maintenance and monitoring, and within the final twelve (12) months of the POE/POU Pilot term, Stantec will coordinate with the Promotores to provide notice to Participant households of the upcoming completion of the SEP, additional information about continuing operation and maintenance of the treatment systems, and the date replacement water deliveries will stop to recipient Participant households.

Stantec will use the Phase 3 annual Participant household survey responses and other MMPO program findings to identify and implement long-term maintenance education needs to help households make an informed commitment to assignment of the treatment systems after the conclusion of the POE/POU Pilot. For households that opt to continue treatment at their own cost and responsibility and/or if there's another state or local funding source available to maintain the system (e.g. Safe and Affordable Funding for Equity and Resilience Program (SAFER)), Stantec will coordinate with the local implementation partner and Promotores to provide Participants with training on operation and maintenance needs and provide contact information for service providers. Assignments will be effected upon the completion date of the SEP.

If a participating household(s) declines assignment of the treatment system, Stantec and the Promotores will communicate the potential drinking water quality risks if treatment is removed to ensure the household(s) is making an informed decision about decommissioning the treatment system. For a household(s) that confirms decommissioning, Stantec will oversee the removal of the treatment system and restoration of the plumbing to its state before the POE/POU Pilot was implemented

before the expiration of the SEP duration. Stantec will guide the Promotores in communicating to decommissioned households when the treatment system is no longer in place and operating, and that the Well is no longer being treated to provide drinking water quality benefits to the connected household(s).

In the event of decommissioning, media will need to be disposed of properly, but there may be hardware components that are still useable. In this event, Stantec will coordinate with the local implementation partner to identify whether the useable components can be donated to non-profit organizations that provides drinking water services or potential use as an educational display. Any donated reusable component of this POE/POU SEP will be reported, along with the recipient non-profit organization, to the Central Coast Water Board in the subsequent quarterly report. In no event shall GWSD, Stantec, or the local implementation partner profit from the sale of POE/POU SEP components.

During Phase 4, Stantec will again evaluate the SEP budget to ensure there are sufficient funds remaining for comprehensive assignment of Well treatment systems and/or decommissioning.

Stantec will work with the Promotores to provide final notice of the POE/POU Pilot completion date information within the final month of the SEP, and will include information about other potential safe drinking water resources to participating households that either receive replacement water during Phase 4 or opt for decommissioning of Well treatment.

Stantec will analyze and summarize Phase 3 annual household survey responses in a “lessons learned” report and POE/POU Pilot Frequently Asked and Questions document during Phase 4.

GWSD and Stantec will confirm POE/POU Pilot completion through a formal certification process and GWSD will conduct a financial audit of the POE/POU Pilot to ensure financial transparency and compliance.

In the event the final cumulative POE/POU Pilot SEP partial liability suspension and offset ends up being less than \$1,551,145, GWSD will coordinate with the Central Coast Water Board to remit payment of the remaining difference between the final SEP suspended liability and the total civil penalty to the State Water Pollution Cleanup and Abatement Account, in accordance with Section III, paragraph 3.k of the Stipulated Order.

SEP Reporting Requirements and Schedule

Quarterly Reports

The SEP Policy recommends quarterly reporting, and GWSD has confirmed that the Central Coast Water Board will require the same for this SEP. Stantec will prepare each quarterly report for review by GWSD and its special counsel, Brownstein Hyatt Farber & Schreck, for timely submission to the Central Coast Water Board.

Stantec will prepare and GWSD representatives will review and submit written quarterly progress reports documenting POE/POU Pilot implementation to the Central Coast Water Board Contact identified in the Section III, paragraph 5 of the Stipulated Order.

At a minimum, the quarterly reports must include a description and photos of the activities completed during the quarter being reported, an accounting of funds expended, and whether GWSD is in compliance with the completion dates in **Table 3** (“SEP Reporting Schedule”), below. If GWSD is not in compliance with the schedule in **Table 3**, the quarterly reports must explain the cause(s) of the delay(s) and the anticipated date of compliance with the schedule. The quarterly reports must also include any monitoring data collected during the reporting period, pursuant to the analyses detailed in **Tables 1** and/or **2**, above.

Reports will be submitted no later than the first day of the second month following the end of each reporting period in accordance with the schedule shown below in **Table 3**. The first quarterly report will be due in accordance with the report submittal date in **Table 3**, for the quarter in which the Stipulated Order’s effective date falls.

Table 3. SEP Reporting Schedule

<i>Reporting Period</i>	<i>Report Submittal Date</i>
January – March	May 1
April – June	August 1
July – September	November 1
October – December	February 1
Certification of SEP Completion	No later than 49 months after the Stipulated Order’s effective date

GWSD shall submit a total of sixteen (16) quarterly progress reports in accordance with the SEP Schedule in **Table 3** until the POE/POU Pilot is fully implemented or until the SEP completion date.

Certification of SEP Completion

No later than forty-nine (49) months after the Stipulated Order’s effective date, GWSD will submit a final report that documents SEP completion and provides a certified statement of SEP completion (“Certification of SEP Completion”) in accordance with the requirements set forth in Section III, paragraph 3.g.ii of the Stipulated Order.

SEP Milestones and Budget

GWSD will expend an estimated total of approximately \$1,551,145 completing the POE/POU Pilot. An actual accounting of each POE/POU Pilot treatment project installation and operation, as well as replacement water deliveries, will be submitted with quarterly reports and will qualify towards partial suspended liability of the administrative civil liability upon completion of the SEP in accordance with Section, paragraph 3.l of the Stipulated Order.

Based on Stantec's project administration costs for similar projects, initial subcontractor cost estimates, and Stantec's extensive experience with similar SEPs and drinking water pilot projects performed under the State's SAFER Drinking Water Program, the POE/POU Pilot Budget estimates for each milestone are provided in **Table 4** ("SEP Milestones and Estimated Budget").

Table 4. SEP Milestones and Estimated Budget

POE/POU Pilot Milestones and Cost Estimates in Percentage of Total SEP Budget			
Milestone	Description Summary	Deadline	Estimated Costs
Project mobilization	GWSD and Stantec mobilize and complete initial project management and internal kickoff.	Within 30 days of Stipulated Order's effective date	~1% (\$15,500)
Quarterly reporting	Stantec will draft 16 quarterly reports for GWSD's review and approval. Stantec will submit reports to Central Coast Water Board in accordance with reporting deadlines provided in Section 11 and Table 3 , above.	Quarterly	~3% (\$46,500)
Phase 1. Community Engagement and Initial Sampling Phase			
Identify potentially impaired drinking water wells and small water systems for sampling	Stantec will prioritize identifying impaired domestic drinking water wells and state small water systems within Underrepresented Communities in Santa Barbara County already identified through the GAMA Program Bay Foundation of Morro Bay's Central Coast Drinking Water Well Testing Program, the Community Water Center monitoring, and the Santa Barbara County's Public Health well monitoring program and Department of Environmental Health well permitting activities, the Santa Barbara County's IRWMP, the Santa Barbara County GSA's, and other local	Within first 12 months of Stipulated Order's effective date; ongoing	~3% (\$46,500)

POE/POU Pilot Milestones and Cost Estimates in Percentage of Total SEP Budget			
Milestone	Description Summary	Deadline	Estimated Costs
	consultants providing well services in Santa Barbara County. Stantec will also identify additional potentially impaired wells, prioritizing those located within Underrepresented Communities in Santa Barbara County for sampling.		
Engage with initially identified well users.	Stantec intends to develop a scope of work and contract with Children and Family Resource Services (CFRS) to work with the Santa Barbara Promotores Network to develop outreach materials for the Promotores to use to engage identified Well users to explain Pilot, sampling process, and resources available through the Pilot if a problem is found. Materials and outreach will be offered in English and Spanish. Stantec will confirm user participation in Pilot with the Promotores.	Within first 12 months of Stipulated Order's effective date; ongoing as needed.	~7% (\$108,500)
Sample initially identified Wells.	Stantec will develop a Pilot sampling SOP and have identified wells sampled for drinking water quality parameters, including bacteriological indicators. If a Well was previously sampled for certain constituents, Stantec will evaluate additional sampling required by the Pilot that is not unnecessarily duplicative. Stantec will have samples collected and analyzed for parameters listed in Table 1.	Within first 12 months Stipulated Order's effective date	~8% (\$124,000)

POE/POU Pilot Milestones and Cost Estimates in Percentage of Total SEP Budget			
Milestone	Description Summary	Deadline	Estimated Costs
	Results will be evaluated for exceedances of applicable State Public Drinking Water Standards and U.S. EPA National Primary Drinking Water Standards.		
Prioritize Wells for POE/POU treatment	Stantec will prioritize wells for POE/POU treatment based on resulting exceedances. Stantec will conduct a second round of sampling for parameters listed in Table 2 at wells prioritized for POE/POU treatment, to characterize parameters that impact treatment technology choice, sizing, and maintenance for POE/POU treatment. All households will be updated of results through Promotores. Households of a well with no exceedances will be removed from the Pilot. Stantec will report the locations of the wells prioritized and resulting sampling reports through the quarterly reports due to the Central Coast Water Board.	Within first 12 months of Stipulated Order's effective date; ongoing as needed.	~6% (\$93,000)
Phase 2. Design, Construction and Replacement Water			
Begin distribution of replacement water for priority Wells.	Stantec will contract with Culligan to provide each participating household with replacement water for either the duration of the Pilot or until effective treatment is installed and operating.	Within first 12 months of Stipulated Order's effective date; ongoing	~7% (\$108,500)
Design and permit POE/POU treatment plans.	Stantec will complete design of POE/POU treatment plans based on NSF/ANSI certified devices. Stantec will file for permits with	Within first 12 months of Stipulated Order's	~13% (\$201,600)

POE/POU Pilot Milestones and Cost Estimates in Percentage of Total SEP Budget			
Milestone	Description Summary	Deadline	Estimated Costs
	the applicable permitting authority(ies). Stantec will work with Promotores to execute access agreements.	effective date; ongoing as budget allows	
Construction and installation of POE/POU treatment systems.	As each Pilot treatment project is designed and permitted, Stantec will oversee the construction and installation of the POE/POU treatment systems.	Initiated within 18 months of Stipulated Order's effective date; ongoing as budget allows	~26% (\$403,300)
Continued budget evaluation to include additional wells.	Stantec will evaluate overall expenses to date and if it appears there is still sufficient funding to include additional wells in the Pilot, Stantec will coordinate with GWSD and revisit Phase 1 for additional wells.	Within 24 months of Stipulated Order's effective date	~6% (\$93,000)
Phase 3. Operation, Maintenance and Monitoring			
Develop and implement MMPO Program and confirmation monitoring of treated Wells	Stantec will work with the installation and local implementation partner and Promotores to develop and engage in a Maintenance, Monitoring, and Public Outreach program with all users of a POE/POU treatment system installed in Phase 2 as each new system comes online. Stantec will complete monitoring of water quality of each priority Well twice annually as treatment comes online (for up to 32 months) to track and evaluate systems are properly functioning to provide safe drinking water to users.	Ongoing; completed no later than 48 months after the Stipulated Order's effective date.	~10% (\$155,100)

POE/POU Pilot Milestones and Cost Estimates in Percentage of Total SEP Budget			
Milestone	Description Summary	Deadline	Estimated Costs
	Sampling results will be provided to users through Promotores, with support and guidance from Stantec. If results show an exceedance, Stantec will investigate and address potential treatment issue and will replace components as necessary. Includes development and distribution of an annual resident survey, to understand residents' experiences and contribute to the lessons learned report and FAQ document.		
Phase 4. Concluding POE/POU Pilot, Long-Term Treatment Support or Decommissioning			
Notice of Completion of Pilot to participating households	Stantec will work with Promotores to provide notice to users of upcoming completion of the POE/POU Pilot. Participant households will be given the option to be assigned the treatment system and make an informed commitment to operation and maintenance of the treatment systems, or to decommission the treatment systems, with information about any other drinking water resources. For households that opt to continue treatment at their own cost and responsibility, Stantec will guide the operation and maintenance subconsultant and Promotores to train households on operation and maintenance	Ongoing; completed no later than 48 months after the Stipulated Order's effective date.	~3% (\$46,500)

POE/POU Pilot Milestones and Cost Estimates in Percentage of Total SEP Budget			
Milestone	Description Summary	Deadline	Estimated Costs
	needs and provide contact information for service providers. For households that opt to decommission the treatment system, Stantec will direct the operation and maintenance subconsultant to remove the treatment system and restore plumbing to its state before the SEP was incorporated. Stantec will guide Promotores in communicating to residents that the treatment system is no longer in place and no longer providing water quality benefits.		
Notice of Completion of Pilot to replacement water users who did not receive treatment	Stantec will work with Promotores to provide notice to replacement water users of completion of the Pilot and conclusion of replacement water deliveries. Users will be provided information about other potential resources for replacement water or drinking water services.	Ongoing; completed no later than 48 months after the Stipulated Order's effective date.	~1% (\$15,500)
Final Administration	Stantec will draft final report for submission to the Central Coast Water Board, as well as a lessons learned and FAQ document that can be used for similar projects in the future, deliverable to the GWSD and Central Coast Water Board and intended for public consumption.	No later than 49 months after the Stipulated Order's effective date	~6% (\$93,000)

The POE/POU Pilot is structured to allow GWSD and Stantec to track costs in each Phases to evaluate whether additional treatment projects can be included to benefit additional households.

Stantec will participate in the GWSD's required financial audit at completion of the SEP.

Suspension and offset of liability for each installed treatment project completing the full four phases of the SEP is unaffected by whether the participating households opt to either assume long-term assignment and operation and maintenance of the treatment systems or decommission treatment during Phase 4. Costs of properly decommissioning a Treated Well system in Phase 4 will also count towards the suspension of liability upon completion for each decommissioned project.

The total suspended liability for completion of the POE/POU Pilot cannot exceed \$1,551,145.00.

SEP readiness, including status of CEQA, permits, and landowner agreements

Each POE/POU Pilot treatment project will be evaluated for California Environmental Quality Act ("CEQA") compliance, including exemptions or possible local waivers. As required in SEP Policy section IX, GWSD shall provide the Central Coast Water Board with any CEQA environmental review documents that were drafted for the POE/POU Pilot. Any additional required CEQA environmental review would be completed once the priority Wells are identified.

Due to the limited footprint of a point of entry system and its minimal impact on property, it is likely each point of entry treatment project will either not qualify as a "Project" under CEQA or will fall under an exemption that allows for the repair of existing facilities.

In order for a POE/POU Pilot treatment system to be installed, the property owner or renter (with a homeowner declaration) signs an access agreement that permits Stantec and its subcontractors access to the property to install and maintain the POE/POU Pilot treatment system for up to thirty-two (32) months at which point the participating households receive assignment of and responsibility for the treatment system or else the connected households opt for decommissioning and Stantec returns the plumbing to pre-POE/POU Pilot conditions. Access agreements will be completed as priority Wells are identified. Landowners are required to sign the agreement immediately prior to design and installation of the POE/POU Pilot treatment systems; thus, enrollment in the POE/POU Pilot occurs on a rolling basis for each project.

Expected benefits or improvements to water quality or beneficial uses

POE/POU Pilot participating households will immediately benefit from improved drinking water quality by either receiving replacement drinking water throughout the duration of the SEP, and/or from using an installed POE/POU Pilot treatment system.

The POE/POU Pilot is specifically designed to address critical water quality issues, directly improving and protecting public health and the environment, for Underrepresented Communities in Santa Barbara County. By constructing treatment systems for priority Wells and providing replacement water during the interim, the POE/POU Pilot reduces risks associated with contaminated water sources and ensures access to a safe and reliable drinking water supply for the community. Its primary focus is delivering significant public health and environmental benefits, aligning with the missions of the Regional and State Water Boards and supporting California's Human

Right to Water Law. Any advantages to the settling party are incidental, as the POE/POU Pilot's core objective is to safeguard public well-being and environmental integrity for current and future generations.

Both the State Board and Central Coast Water Board aim to “to preserve, enhance, and restore the quality of California’s water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations.”²³ Similarly, California’s Human Right to Water Law prioritizes providing safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation.²⁴ The POE/POU Pilot aligns with these objectives by addressing issues identified in the priority Wells and ensuring access to safe drinking water through the treatment systems and replacement water. Further, these efforts directly protect public health and support the State and Central Coast Water Boards’ mission to restore and preserve water quality. By safeguarding critical water resources, the POE/POU Pilot also upholds California’s commitment to meeting the water needs of current and future generations.

Will this project further the State Water Resources Control Board’s core value of the human right to water? If yes, describe.

Yes. The POE/POU Pilot directly addresses Water Code section 106.3(a) and the State Water Resources Control Board’s core value of the human right to water. The intent of the POE/POU Pilot is to ensure access to safe drinking water through the treatment systems and replacement water, serving Underrepresented Communities in Santa Barbara County.

Optional information. If appropriate, discuss the following:

Whether this project is resilient to climate change and conforms with State Water Board Resolution No. 2017-0012, Comprehensive Response to Climate Change

State Water Board Resolution No. 2017-0012 encourages climate-conscious approaches to water infrastructure, particularly those that reduce greenhouse gas emissions and enhance long-term resilience. In alignment with this resolution, the POE/POU Pilot avoids the need for a carbon-intensive centralized water treatment and

²³ See the Central Coast Water Board’s Mission Statement, *available at*: https://www.waterboards.ca.gov/centralcoast/about_us/#:~:text=To%20preserve%2C%20enhance%2C%20and%20restore,of%20present%20and%20future%20generations; The Water Board’s Mission Statement, *available at*: https://www.waterboards.ca.gov/about_us/#:~:text=To%20preserve%2C%20enhance%2C%20and%20restore,of%20present%20and%20future%20generations.

²⁴ See Wat. Code, § 106.3; see also the SAFER Drinking Water Site, *available at*: <https://www.waterboards.ca.gov/safer/> (“California’s Human Right to Water law declares that “every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes.”).

distribution system by implementing localized solutions directly at participating households.

The systems installed under the POE/POU Pilot are intended to be designed as energy-efficient, consuming significantly less power than traditional water infrastructure. By minimizing energy use and eliminating the need for large-scale conveyance, the POE/POU Pilot directly supports the Resolution No. 2017-0012's goals of climate change mitigation and adaptation, while also delivering safe and reliable water to communities in need.

Whether this project can be the basis for additional funding from other sources

Success of the POE/POU Pilot is not dependent on additional sources of funding. As a pilot, though, each of the four phases is intended to serve future potential projects in the region or state that seek to improve access to safe drinking water in vulnerable communities.

Whether this project is required by another entity or agency

This POE/POU Pilot is not required by another entity or agency and is not already required by law or regulation. Each priority Well will also be screened in Phase 1 for eligibility to receive treatment through this SEP based on whether treatment of a particular well is subject to other laws or regulations.

Whether this project has monitoring, success criteria, or other tools to track long-term success

The POE/POU Pilot will conduct ongoing drinking water quality monitoring at priority Wells equipped with POE/POU Pilot treatment systems. (See priority water quality parameters in **Tables 1 and 2**). This comprehensive monitoring effort will be based on developed SAFER program criteria and guidance, and will provide valuable localized data regarding the drinking water quality of this area. Further, by tracking drinking water quality over a period of up to thirty-two (32) months, at an initial frequency of semi-annual sampling following treatment installation, the POE/POU Pilot will also capture seasonal variations, offering a more complete picture of system performance over time. This data may serve as a valuable resource for the Central Coast Water Board and State Water Resources Control Board in evaluating the effectiveness of the particular point of entry/point of use devices for use in other projects.

Whether the applicant has an established record of completing projects with the Water Board or other agencies

While this is GWSD's first formal POE/POU Pilot, GWSD has consistently demonstrated reliability and responsiveness in addressing water quality issues, regulatory compliance, and open and transparent communications with the Central Coast Water Board. GWSD maintains ongoing communication and coordination with Central Coast Water Board staff, laying a strong foundation for successful project implementation.

Additionally, GWSD has coordinated SEP design and resources with Stantec, a well-known professional drinking water project administrator and implementer throughout the state. Stantec has advised the State's SAFER program, and partners with related vendors within the region where the SEP will be implemented. With Stantec's established record of completing similar projects, GWSD is further confident in the success of this POE/POU Pilot.

Whether the applicant has the institutional stability and capacity to complete the project as proposed

GWSD has the institutional stability and internal capacity necessary to successfully complete the Project. GWSD has experienced staff, sound financial management practices, and a clear governance structure. Again, GWSD is partnering with Stantec as the third-party administrator and implementer. Stantec has a long history of successful drinking water projects completed in coordination with the State Water Board's SAFER Program. While this would be GWSD's first formal project with the Central Coast Water Board, GWSD has consistently demonstrated its ability to manage complex operational responsibilities and respond effectively to water quality concerns. Additionally, GWSD's Board of Directors has formed an Ad Hoc Spill Committee, served by two of the five GWSD Board of Directors and the GWSD Co-General Managers . This Ad Hoc Committee has been directly involved in the design of the SEP and the makeup of the Committee includes multiple levels of GWSD leadership and their respective institutional knowledge to ensure smooth POE/POU Pilot project implementation across the next four years, and successful completion of the SEP.