



State Water Resources Control Board

April 15, 2026

CERTIFIED MAIL

The Sea Ranch Water Company
Attn: Brian Murphy



CERTIFIED MAIL NO: 

Water Rights: A022377, A029466, A030438

NOTICE OF VIOLATION: FAILURE TO FILE ANNUAL WATER DIVERSION AND USE REPORTS AND COMPLY WITH MEASUREMENT AND REPORTING REGULATIONS

Dear Sea Ranch Water Company:

Water right owners must submit annual Water Diversion and Use Reports (“reports”) to the State Water Resources Control Board (“State Water Board” or “Board”) detailing how much water was diverted and used in the previous water year. The reporting period, or water year, begins October 1 and ends September 30. The reports include progress reports by permittees and annual reports of licensees. These reports are due before February 1 of each year and must include information on the device and method used to calculate the amount of water diverted, as well as the measurement data collected by such a device.

Failure to File Annual Water Diversion and Use Reports

As of the date of this letter, the Division of Water Rights (“Division”) has not received your water diversion and use reports (reports of licensee) for License 13830 (A022377) for the 2022-2023, 2023-2024, and 2024-2025 water years. This is a violation of section 929 of Title 23 of the California Code of Regulations.

The Division has not received your water diversion and use reports (progress reports) for Permit 20751 (A029466) for the 2022-2023 and 2023-2024 water years. The Division has also not received progress reports for Permit 20801 (A030438) for the 2022-2023, 2023-2024, and 2024-2025 water years. This is a violation of section 925 of Title 23 of the California Code of Regulations.

Failure to Comply with Measurement and Reporting Regulations

Due to the diversion size, the water right owner is also required to submit information regarding measuring devices and data collected from those devices at a frequency

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commensurate with the diversion size as specified in the measurement regulation (Title 23, Chapter 2.8, sections 931-939.6 of the California Code of Regulations). The measurement collection frequency is DAILY for the three water rights owned by The Sea Ranch Water Company.

The Division of Water Rights reviewed the 2024-2025 report submitted for A029466 and found that the water right owner failed to submit the data collected from their measurement device(s). This failure constitutes a violation of Title 23 of the California Code of Regulations, section 925 subdivision (c)(7). Due to the lack of reports for the remaining water years and/or water rights, additional violations of Title 23 of the California Code of Regulations, sections 925 subdivision (c)(7) and 929 subdivision (c)(7) are alleged for failure to submit measurement device data.

Enforcement

Violations of a regulation adopted by the Board are subject to administrative civil liabilities under Water Code section 1846. A violation occurring before January 1, 2025, is subject to a liability of up to \$500 a day. A violation occurring on or after January 1, 2025, is subject to liability of up to \$1,000 a day. Each report not submitted by the required deadline is a separate violation.

As of the date of this letter, the Division has identified the following violations and the penalty amounts to which you may be subjected to:

1) Failure to submit annual reports

- The 2024-2025 reports for water rights A022377 and A030438 are 74 days late, resulting in a statutory maximum penalty of \$148,000.
- The 2023-2024 reports for all three water rights are over a year late. They will each be assessed as 365 days late, resulting in a statutory maximum penalty of \$1,095,000.
- The 2022-2023 reports for all three water rights are over a year late. They will each be assessed as 365 days late, resulting in a statutory maximum penalty of \$547,500.

2) Failure to submit measurement device data in the annual reports

- No measurement device data was included in the 2024-2025 report submitted for A029466 and no measurement data was received for the additional two delinquent 2024-2025 reports. The data files are 74 days late, resulting in a statutory maximum penalty of \$222,000.
- No measurement device data was received for the three delinquent reports for the 2023-2024 water year. The data files will be assessed as 365 days late, resulting in a statutory maximum penalty of \$1,095,000.

- No measurement device data was received for the three delinquent reports for the 2022-2023 water year. The data files will be assessed as 365 days late, resulting in a statutory maximum penalty of \$547,500.

Corrective Action

If you submit your delinquent reports AND measurement device data no later than April 30, 2026, the Division will *NOT* issue an Administrative Civil Liability Complaint.

Reports and measurement device datafiles must be submitted online through the State Water Board's California Water Accounting, Tracking, and Reporting System (CalWATRS) at <https://calwatrs.waterboards.ca.gov>.

General measurement datafiles must include, as applicable: date and time of measurement; volume and rate of water directly diverted; volume and rate of water diverted to or collected to storage; volume and rate of water withdrawn from storage in a qualifying reservoir; and include appropriate units.

General measurement datafiles must distinguish between general measurement data relating to direct diversions, diversions to or collections to storage, rediversions, withdrawals from storage in qualifying reservoirs, and releases from qualifying reservoirs, as applicable.

The reported values in each general measurement datafile must reflect general measurement data associated with the respective measurement location, point of diversion, or location where water is withdrawn or released from a qualifying reservoir, as applicable. Diverters may submit multiple general measurement datafiles for the same measurement location, point of diversion, or location where water is withdrawn or released from a qualifying reservoir.

Please refer to The Water Measurement Regulation (Chapter 2.8 of Title 23 of the California Code of Regulations) for additional information.

If you have questions or concerns, please contact Jennifer O'Boyle by email at Jennifer.OBoyle@Waterboards.ca.gov or by phone at (916) 324-6235.

Sincerely,



Karen Kramer, PG
Program Manager - Enforcement Special Projects Section
Division of Water Rights

ec: Brian Murphy
Bmurphy@tsra.org