

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

STAFF REPORT FOR REGULAR MEETING OF JUNE 22-23, 2023

Prepared on June 6, 2023

ITEM NUMBER: 8

SUBJECT: ENFORCEMENT REPORT AND ENFORCEMENT PROGRAM UPDATE

STAFF CONTACT: Tamara Anderson, (805) 549-3334, tamara.anderson@waterboards.ca.gov and Thea Tryon, (805) 542-4776, thea.tryon@waterboards.ca.gov

ACTION: Informational

SUMMARY

This staff report summarizes recent Central Coast Water Board enforcement actions and provides an annual enforcement program update that includes a recommendation for maintaining the existing enforcement program priorities, a status update on completed and in progress projects funded by suspended administrative civil liabilities, and a summary of complaints submitted to the California Environmental Protection Agency (CalEPA) complaint system.

ENFORCEMENT REPORT

Attachment 1 of this staff report includes the Enforcement Report consisting of Tables 1 through 4. Tables 1 through 3 summarize Central Coast Water Board enforcement actions taken from December 1, 2022 through March 31, 2023, and include final administrative civil liability (ACL) orders (Table 1), expedited payment program letters (Table 2), and notices of violation covering various Central Coast Water Board programs (Table 3).

Table 4 in Attachment 1 summarizes alleged violations reported in the California Integrated Water Quality System (CIWQS) and the Storm Water Multiple Application and Report Tracking System (SMARTS) from October 1, 2022 through January 31, 2023. Central Coast Water Board staff are currently reviewing the alleged violations that have not already been addressed to assess priorities for potential future enforcement.

A general description of the different types of enforcement actions Central Coast Water Board staff may take or recommend are provided in Attachment 2. Abbreviations used throughout the Enforcement Report are defined in Attachment 3. More detailed descriptions of each type of enforcement action are provided in the State Water

Resources Control Board's (State Water Board) [2017 Water Quality Enforcement Policy](#).¹

BACKGROUND FOR ENFORCEMENT PROGRAM UPDATE

The Central Coast Water Board enforcement team consists of Thea Tryon, Assistant Executive Officer; Tamara Anderson, Senior Water Resource Control Engineer Specialist; and Todd Stanley, Water Resource Control Engineer. Central Coast Water Board enforcement staff assist program staff with informal and formal enforcement; evaluate and prioritize violations to ensure compliance with state and federal laws, regulations, policies, plans, and permits; addresses mandatory enforcement obligations imposed by law; coordinate with other water board divisions and external agencies on enforcement actions and to improve enforcement consistency and effectiveness; and manage environmental complaints received through the CalEPA compliant system.

Enforcement is an important component of the Water Boards' authority to encourage the regulated community to anticipate, identify, and correct violations and the Water Boards have a variety of enforcement tools to use in response to non-compliance by dischargers. The Central Coast Water Board follows a progressive enforcement approach and contemplates an escalating series of actions beginning with notification of violations and compliance assistance, followed by enforcement orders compelling compliance, and potentially a complaint for civil liabilities as appropriate and necessary. Central Coast Water Board enforcement staff follow the State Water Board's Water Quality Enforcement Policy in making enforcement related decisions and to calculate penalty amounts as the Policy establishes an administrative civil liability assessment methodology to create a transparent, fair, and consistent statewide approach to assess liabilities.

For transparency and to keep the public and Central Coast Water Board members informed on enforcement program actions, Central Coast Water Board enforcement staff present multiple (approximately quarterly) enforcement reports to the Central Coast Water Board per year and provide annual updates on enforcement program priorities and completed and in progress projects funded by suspended administrative civil liabilities.

ENFORCEMENT PRIORITIES

The State Water Board's Water Quality Enforcement Policy includes a request for Regional Water Board enforcement staff to seek input on general region-specific enforcement priorities from members of the public and the Regional Water Board members at a regularly noticed public meeting on an annual basis. Central Coast Water

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

Board enforcement staff recommend keeping the same general enforcement priorities as those presented during the last annual program update:²

- Address violations that pose an immediate and significant threat to water quality or result in significant detrimental impacts to human health and/or the environment.
- Prioritize violations associated with discharges that impact water quality in Underrepresented Communities.³
- Prioritize violations associated with discharges that result in drinking water supplies exceeding drinking water standards for individuals and/or small communities.
- Address violations involving falsification of information and non-compliant dischargers that realize a significant competitive economic advantage over compliant members of the regulated public.

Central Coast Water Board enforcement staff recommend using the same enforcement priorities because these priorities have been effective in informing which enforcement actions are actively pursued to ensure alignment with the Central Coast Water Board's current overall priorities, the enforcement priorities for discretionary enforcement actions outlined in the State Water Board's Water Quality Enforcement Policy, and CalEPA's recent directive for equity-centered enforcement.⁴

In general, Central Coast Water Board enforcement staff cannot predict what type, how many, or how complex the violations will be at any given time and there are typically many more violations and non-compliance issues that need to be addressed than there are enforcement resources available to address them. Therefore, Central Coast Water Board enforcement staff will use the general enforcement priorities described above to guide which discretionary enforcement actions⁵ to pursue and how best to assist program staff. The enforcement priorities are not in a particular order; however, Central Coast Water Board enforcement staff will typically prioritize violations associated with more than one enforcement priority. In addition to focusing the Central Coast Water Board's enforcement resources on violations that negatively impact Underrepresented Communities and drinking water supplies for individuals and/or small communities, enforcement staff are also evaluating how water quality impacts associated with climate change inform which enforcement actions to prioritize if corrective actions or mitigation plans are not reasonably implemented by dischargers.

² State Water Board's enforcement priorities are available at:

https://www.waterboards.ca.gov/water_issues/programs/enforcement/priorities.html

³ Underrepresented Communities include, but are not limited to Disadvantaged Communities (DACs), Severely Disadvantaged Communities (SDACs), Economically Distressed Areas (EDAs), Tribes, Environmentally Disadvantaged Communities (EnvDACs), and members of Fringe Communities.

⁴ California Environmental Protection Agency Environmental Enforcement Priorities April 13, 2023 memo available at: https://calepa.ca.gov/wp-content/uploads/sites/6/2023/04/Secty-Garcia-2023-Enforcement-Memo_Final.pdf

⁵ Central Coast Water Board will continue to address mandatory enforcement obligations imposed by law (e.g., mandatory minimum penalties under California Water Code sections 13385 (h) & (i)).

It is Central Coast Water Board enforcement staff's overall goal to use the enforcement priorities to enhance the Water Boards' ability to focus and leverage its enforcement resources and to achieve the general deterrence needed to encourage the regulated community to anticipate, identify, and correct potential non-compliance issues before they occur.

STATUS UPDATE ON PROJECTS FUNDED BY SUSPENDED ADMINISTRATIVE CIVIL LIABILITIES

Central Coast Water Board enforcement staff typically reach resolution of an ACL through settlement. As part of the settlement, the discharger can request a permanent suspension of a portion of the liability in lieu of submitting the full payment to the State Water Board's Cleanup and Abatement Account (CAA) or the Waste Discharge Permit Fund (WDPF) to satisfy the entire administrative liability amount as long as the discharger agrees to fund and carry out the supplemental environmental project (SEP), enhanced compliance action (ECA), or compliance project (CP) as described in the settlement agreement.⁶ The State Water Board's [Policy on Supplemental Environmental Projects](#)⁷ establishes a framework for the Water Boards to use in exercising their enforcement discretion to determine appropriate SEPs and ECAs during settlements and provides guidance for implementing SEPs and ECAs. The State Water Board's Water Quality Enforcement Policy specifies conditions for which CPs may be considered as part of a settlement.

This section of the staff report summarizes two SEPs and a CP that are in-progress between March 28, 2022 and June 6, 2023. During this timeframe, no ECAs were in-progress and no SEPs, ECAs, or CPs were completed. For information on SEPs, ECAs, and CPs completed or in progress prior to March 2022, please refer to the [April 21-22, 2022 Enforcement Report](#).

IN-PROGRESS SEPs

Monterey Mushroom ACL Order No. R3-2020-0048: Community Water Center (CWC) 1,2,3-Trichloropropane (1,2,3-TCP) Treatment Systems SEP

On July 17, 2020, the Central Coast Water Board issued ACL Order No. R3-2020-0048 to Monterey Mushrooms, Inc. and Spawn Mate, Inc. for unauthorized discharges of process wastewater and polluted stormwater to an unnamed tributary of Elkhorn Slough, for a total liability amount of \$1,169,425. The settlement includes a third party-administered SEP that is being performed by CWC for \$599,775 to conduct outreach

⁶ A SEP is an environmentally beneficial project that a person subject to an enforcement action voluntarily agrees to undertake or fund through an appropriate third party. An ECA is a project that enables a discharger to make capital or operational improvements beyond those required by law, and are separate from projects designed to merely bring a discharger into compliance. A CP is a project designed to address problems related to the violation and bring the discharger back into compliance in a timely manner and can only be considered where they are expressly authorized by statute.

⁷ State Water Board, 2017 Policy on Supplemental Environmental Projects, Effective May 3, 2018, https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/seps/20180503_sep_policy_a.md.pdf

and education and to implement a pilot project for the design, installation, maintenance, and monitoring of 1,2,3-TCP point of entry (POE) household-level water treatment systems for Disadvantaged Community (DAC) households in unincorporated areas of northern Monterey County. Although the residents living in these homes are receiving bottled water for drinking and cooking to address concurrent nitrate contamination, these residents are not protected from exposure to 1,2,3-TCP due to inhalation and dermal exposure from showering and other household uses. Cost effective treatment methods for 1,2,3-TCP have not been widely studied or implemented and the data from implementation of this SEP has already been used to inform State Water Board Division of Drinking Water work products. This SEP is in its final stages of completion and the following is a summary of the various components of this SEP:

Outreach and education – CWC conducted community outreach and education to potential candidate households by providing information about 1,2,3-TCP health impacts and offering the opportunity to potentially receive POE treatment to address the 1,2,3-TCP impacts for their domestic supply well with concentrations of 1,2,3-TCP that exceed the maximum contaminant level of 5 parts per trillion. In 2020, CWC conducted initial outreach to 21 households during the first six months of the SEP project. These outreach efforts were complicated by pandemic related constraints for in person meetings, but CWC was successful in modifying its community outreach accordingly and the added time to do an adaptive outreach strategy was warranted and necessary. After obtaining agreements from a limited number of eligible households to install 1,2,3-TCP treatment systems, CWC had to conduct several unanticipated subsequent outreach efforts to obtain additional potential candidate households, because some of the original candidate household sites were not viable for installing a treatment system due to various reasons such as:

- Wells that originally exceeded the 1,2,3-TCP maximum contaminant level were non-detect during follow-up sampling;
- Total coliform and/or E. coli bacteria were present in raw water samples at many sites and many property owners lacked funding to fix infrastructure issues leading to bacterial contamination or chose not to prioritize spending resources on these repairs. Technical experts and CWC's engineering consultant recommended eliminating microbial contamination routes prior to treatment system installation, because bacteria could colonize the granular activated carbon in the treatment systems and microbes could present a potential health concern, particularly in cases where E. coli was present;
- Limited availability of well repair contractors due to rebuilding needs after the CZU lightning complex fire and 2023 winter storm impacts;
- Pandemic caused supply chain delays for materials; and
- Candidate property owners changed their mind and were not amenable to receiving POE treatment systems after further consideration.

POE treatment system implementation – Starting in September 2020, CWC began with the first phase of site assessments. Site assessments were conducted for households with wells that had previously exceeded the 1,2,3-TCP maximum contaminant level. Each site assessment includes additional water quality sampling and feasibility

assessments prior to POE treatment system installation. CWC's engineering consultant designed the POE treatment systems specifically to treat 1,2,3-TCP and CWC purchased the treatment systems from Culligan. The original 1,2,3-TCP POE treatment system design consisted of four cylindrical tanks filled with granular activated carbon, that were installed outside of the home on a concrete pad where water enters the house.

During phase one, the project team completed 12 site assessments of wells serving approximately 20 households and installed one POE treatment system. The site assessment data and costs to install, operate, maintain, and monitor the POE treatment systems installed in the first phase informed the scope of the second phase. The project team implemented the second phase of the treatment system installations in two parts. During the first part of phase two, the project team completed 3 additional site assessments and installed 2 additional POE treatment systems. Informed by lessons learned from installing and monitoring the first three POE treatment systems (one system in phase one and two systems in the first part of phase two), the project team paused and re-evaluated the POE treatment system design and size. After consultation with technical experts (including Division of Drinking Water staff), the POE treatment system size was decreased to yield easier to install systems with lower initial capital costs. Improvement of the design and decreasing the size of the POE treatment systems allowed for additional systems to be installed for the remainder of the SEP project. CWC is currently implementing the second part of phase two, and to date, the project team has completed 7 additional site assessments and installed 6 additional POE treatment systems, using the smaller system design.

To date, the project team has conducted 22 site assessments and installed nine POE treatment systems, serving 11 households, comprised of approximately 47 people. The first POE treatment system was installed in December 2020, and the most recent POE treatment system was installed in November 2022. The project team has intermittently taken a few of the treatment systems offline due to bacteria issues. Currently, one treatment system is offline and CWC is coordinating with the property owner and a subcontractor to conduct well repairs to address the bacteria issues.

The contractor maintains and monitors POE treatment systems monthly and CWC provides monthly reports to property owners and discusses the results with them. Since the POE treatment systems have been online, all monitoring results for 1,2,3-TCP have been below the detection limit. The project team has replaced the granular activated carbon on two systems due to bacteria contamination, neither of these replacements was related to 1,2,3-TCP breakthrough. Therefore, the POE treatment systems have been very successful in treating 1,2,3-TCP to below detection levels resulting in 47 people not being exposed to 1,2,3-TCP during showering or other such activities since their systems were installed.

The operation and maintenance costs for the POE treatment systems were lower than originally anticipated by the project team. Therefore, the project team is conducting additional site assessments and working with additional homeowners to install more POE treatment systems with the remaining SEP monies. The project team anticipates it

has enough remaining budget to install three additional POE treatment systems. Central Coast Water Board staff will continue to coordinate with CWC on the remaining sites to receive POE treatment systems. To allow for additional time to install the remaining systems with the remaining SEP funds, the Central Coast Water Board Executive Officer is considering an extension of the SEP completion date to October 17, 2023.

Engage technical and regulatory experts and share project results – CWC convened a technical advisory committee (TAC) with approximately thirty participants (including Division of Drinking Water technical staff and Safe and Affordable Funding for Equity and Resilience (SAFER) staff) to inform the SEP project. The Monterey County Environmental Health Bureau has also engaged on this project through its involvement in the TAC. Additionally, CWC has been sharing lessons learned related to this pilot project with the SAFER program staff and participated in a stakeholder outreach effort on POE/ Point of Use (POU) organized by the SAFER Engagement Unit. CWC has also submitted information related to the SEP project and provided recommendations for using POEs to treat 1,2,3-TCP to SAFER to assist in their development of the POE/POU white paper and the California Drinking Water Needs Assessment.⁸

CWC also submits quarterly progress reports to the Central Coast Water Board, which include updates on SEP task progress and details on POE treatment system performance and budget. As of February 29, 2023, CWC has expended \$452,915, and \$146,860 is remaining for the purchase and installation of the additional systems and operation and maintenance of all systems until the SEP completion date, and to cover CWC's remaining expenses including indirect costs, project oversight, and sharing project results with stakeholders.

CWC has pursued additional grant funding to allow for continued operation and maintenance of the installed systems. The State Water Board's Division of Financial Assistance awarded CWC with a \$1.8 million grant to install additional 1,2,3-TCP POE treatment systems and to monitor, operate, and maintain the treatment systems already installed through the SEP project and additional systems that will be installed.

Successes – CWC and Central Coast Water Board enforcement staff have learned a tremendous amount in implementing this first of its kind SEP. Even though both CWC and Central Coast Water Board staff have expended significant resources above and beyond what was originally expected in implementing this SEP, we have implemented a project that is aligned with the Central Coast Water Board's Human Right to Water and Racial Equity resolutions. Currently, approximately 47 people are not exposed to levels of 1,2,3-TCP that are unsafe.

This SEP has taught us that outreach and installing POE treatment systems on individual homes in disadvantaged communities is very complex and involved and requires an adaptive management strategy. The outreach component of implementing Environmental Justice/Human Right to Water SEPs does take more time compared to

⁸ SAFER POU/POE white paper is available at: <https://www.waterboards.ca.gov/safer/docs/2022/draft-2022-pou-poe-report.pdf> and the SAFER California Drinking Water Needs Assessment is available at: https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/needs.html

discharger led capital improvement type projects. It is critical that we continue to work with local partners in the communities that need assistance, because they are the experts in building trust with disadvantaged communities and they have the skill set to connect and effectively engage with people in these communities. There have also been many unanticipated technical/infrastructure obstacles that typically need to be addressed at individual homes prior to treatment system installations, but with the help from numerous technical experts many of those obstacles can be addressed to ensure the treatment system can be installed and function properly.

Monterey One Water ACL Order No. R3-2021-0051: Private Lateral Rehabilitation Project for the Castroville Community Services District SEP

On August 18, 2021, the Central Coast Water Board issued ACL Order No. R3-2021-0051 to Monterey One Water to resolve three violations for unauthorized discharges of untreated wastewater from Monterey One Water's wastewater treatment plant and sanitary sewer system to the Pacific Ocean, for a total administrative civil liability amount of \$800,000. Monterey One Water applied \$790,000 of the penalty to the Private Lateral Rehabilitation Project for the Castroville Community Services District SEP. This SEP consists of assessment and repair or replacement of privately-owned residential sewer laterals in poor condition within DAC areas in the Castroville Community Services District's service area and identifies 101 properties for inclusion in the project. The SEP is intended to improve the sanitary sewer system integrity to reduce the potential for rainwater entering and sewage exiting the system, thereby preventing sanitary sewer overflows and protecting local surface water and groundwater quality and public health.

Outreach and lateral video investigations – From December 2021 through December 2022, Monterey One Water notified property owners and residents via bilingual mailed flyers and door hangers of their planned lateral video investigative work. Monterey One Water's contractors conducted the video inspections to evaluate the sewer lateral condition and possible defects.

Monterey One Water conducted the video investigation in two phases. The first phase included the video investigation of 23 manholes within the project area and the laterals for 53 properties by launching a camera in the lateral from the sanitary sewer main towards the private residence. However, for 48 of the 101 properties, Monterey One Water's contractor was unable to access the sewer laterals from the sanitary sewer main via the public right of way to conduct video investigations, so Monterey One Water proposed investigating these additional properties in a second phase.

The second phase included video investigations of 48 properties by launching a camera in the lateral from the private residence towards the sanitary sewer main. Monterey One Water first obtained right of entry permissions from each property owner to conduct video investigations from the cleanout near the house. Monterey One Water completed two mailings and went door-to-door and got permission from 70 properties (instead of just 48) to increase the chances of having enough viable properties to inspect. Some of the properties did not have cleanouts, so Monterey One Water's contractor needed to

pull a toilet or use a roof vent to complete the inspection. These unforeseen access issues related to an appropriate entry point for conducting the video investigation of the lateral, contributed to delays in conducting the remaining video inspections of the private sewer laterals. Monterey One Water's SEP did not anticipate this second round of outreach services or the complications with accessing laterals to complete the video inspections. The quote to hire a Right of Way consultant to coordinate the right of entry permissions exceeded the budgeted amount for the SEP, so Monterey One Water staff coordinated the outreach and obtained permissions through a Public Outreach consultant. Monterey One Water is managing the right of entry permission agreements for the upcoming lateral rehabilitation work through the same Public Outreach consultant.

In total, Monterey One Water's contractor conducted a total of 101 lateral inspections.

Lateral rehabilitation – Monterey One Water analyzed the results of the video investigations and out of the 101 private laterals investigated, 43 laterals qualify for repair. For the 43 private laterals, Monterey One Water plans to repair or replace the entire lateral for customers that enroll into the program on a first come first serve basis until SEP funds are expended.

The SEP also included an option to line manholes and replace manhole rings and covers. Monterey One Water's contractor inspected the manholes, and because all were in good condition, they did not need repair. Monterey One Water plans to instead use those allocated funds for the lateral repairs and replacements.

Owners of private laterals – Out of the 43 private laterals that meet the criteria of the program, 26 of the laterals are on owner-occupied properties and Monterey One Water initiated the enrollment process with outreach services to obtain required property owner approvals to complete the rehabilitation process. Currently, there are 17 owner-occupied customers enrolled. Monterey One Water completed the bid documents to select a contractor to complete the rehabilitation work.

The remaining 17 private laterals that need repair are renter-occupied properties. During the August 2021 Central Coast Water Board meeting when the proposed ACL Order No. R3-2021-0051 was deliberated, board members shared their preference to only conduct lateral repairs and replacements at owner-occupied properties. Obtaining financial information from the owners of these renter-occupied properties was not feasible, instead enforcement staff evaluated publicly available information on the owners and determined that all the owners live in Castroville or another nearby Monterey County community, and most of the owners of the renter-occupied properties live in DACs. Therefore, Central Coast Water Board staff agreed to let Monterey One Water proceed with including the 17 renter-occupied properties in the enrollment process for repairing and replacing the laterals on the renter-occupied properties to protect the public health of the renters and to ensure there is reduced infiltration and inflow into these laterals that require repair.

Monterey One Water submits quarterly reports to the Central Coast Water Board, which include updates on SEP task progress and budget details. As of March 31, 2023, Monterey One Water has expended \$169,265 and 79 percent of the total SEP amount is left.

IN-PROGRESS CP

San Juan Bautista ACL Order R3-2022-0031: San Juan Bautista to Hollister Sanitary Sewer Force Main CP

On October 18, 2022, the Central Coast Water Board Executive Officer issued ACL Order No. R3-2022-0031 to the City of San Juan Bautista to resolve 327 alleged violations associated with effluent limitation exceedances from the City's Wastewater Treatment and Reclamation Plant from March 31, 2007 through March 31, 2022, imposing \$870,000 in administrative civil liabilities. San Juan Bautista chose to suspend \$696,000 of the penalty to implement the San Juan Bautista to Hollister Sanitary Sewer Force Main CP. This CP is to construct a sanitary sewer force main to convey all the City's wastewater to the City of Hollister's Domestic Water Reclamation Facility. Upon completion of the CP, the City will no longer operate a wastewater treatment plant and will no longer require a permit to authorize the discharge of its treated wastewater. United States Environmental Protection Agency (U.S. EPA) issued an Administrative Order on Consent, and the City determined it will complete the CP, along with other projects, to comply with the Administrative Order on Consent.

The City has been delayed in obtaining some environmental and encroachment permits, which has resulted in the City needing to postpone bid awards for construction of the project. The City recently submitted a request to extend several interim milestone dates in the CP and this request is currently under review. The City does anticipate meeting the final CP completion date of June 26, 2024.

The City submits quarterly progress reports and Central Coast Water Board enforcement staff will continue to coordinate with City staff and U.S. EPA staff on CP progress.

ENVIRONMENTAL COMPLAINT SYSTEM

Central Coast Water Board enforcement staff manages complaints received through the [CalEPA \(California Environmental Protection Agency\) Environmental Complaint System](#).⁹ Central Coast Water Board enforcement staff work with program staff and external agencies to address and/or refer complaints to other agencies. From May 26, 2022 to May 26, 2023, the Central Coast Water Board received 52 complaints and Central Coast Water Board enforcement staff have closed 44 of those complaint, referred 3 complaints to other agencies, and 5 complaints are open and being investigated. Complaints range from a variety of environmental issues. Over the past year, the most common issue raised in complaints was related to alleged water quality

⁹ Californians can file complaints in the CalEPA Environmental Complaint System at the following website: <https://calepa.my.salesforce-sites.com/complaints/>

impacts associated with homeless encampments. Examples of other alleged activities impacting water quality included illicit discharges to municipal separate storm sewer systems, illicit construction activities, unpermitted fill in waters of the state, and illicit irrigated agriculture and cannabis activities.

ALIGNMENT WITH CENTRAL COAST WATER BOARD PRIORITIES

Human Right to Water, Environmental Justice, and Racial Equity

The Central Coast Water Board's enforcement priorities are consistent with Central Coast Water Board Human Right to Water Resolution No. R3-2017-0004 and Racial Equity Resolution No. R3-2023-0002.

Central Coast Water Board enforcement staff have prioritized pursuing enforcement of violations associated with discharges impacting communities with economic, racial, social, and/or environmental inequities that may be more susceptible to the resulting public health impacts. For example, enforcement staff have prioritized violations associated with drinking water impacts in communities that do not have the economic means to provide adequate treatment for contaminated groundwater. Central Coast Water Board enforcement staff plan to continue to prioritize violations impacting Underrepresented Communities.

Additionally, Central Coast Water Board enforcement staff has expended resources to facilitate projects to advance environmental justice, racial equity, and water equity in Underrepresented Communities. The 1,2,3-TCP Treatment Systems SEP and the Private Lateral Rehabilitation Project for the Castroville Community Services District SEP are examples how enforcement resources have been dedicated to assist Underrepresented Communities and individuals in addressing drinking water and sewer needs.

The Enforcement Program is also dedicating resources to address violations associated with nitrate loading from irrigated agriculture that impact domestic drinking water wells.

Climate Change

Central Coast Water Board enforcement staff are in the process of evaluating how violations associated with impacts from non-compliance with climate change related adaptation, mitigation, and resiliency projects, or that exacerbate climate change impacts, can inform enforcement priorities. As Central Coast Water Board programs continue to refine permit requirements and priorities related to climate change mitigation and adaptation, this will further refine enforcement priorities focused on climate change.

Central Coast Water Board enforcement staff has expended resources to facilitate projects in alignment with the climate change priority. The Private Lateral Rehabilitation Project for the Castroville Community Services District SEP is intended to build climate change resiliency by reducing potential for inflow and infiltration into the district's sanitary sewer system and helping prevent sanitary sewer system overflows at the Castroville and Moss Landing pump stations that are near surface waterbodies.

Because climate change has resulted in more intense storm events resulting in more localized flooding, there may be increased potential for inflow and infiltration into the district's sanitary sewer system.

The San Juan Bautista to Hollister Sanitary Sewer Force Main CP will improve water supply resiliency in response to climate change by sending San Juan Bautista's wastewater to a facility that provides advanced treatment and recycles treated wastewater for beneficial reuse.

CONCLUSION

Central Coast Water Board enforcement staff continue to prioritize enforcement actions that address violations that impact water quality in Underrepresented Communities. The SEPs that are currently in progress demonstrate our commitment to address impacts in communities facing economic, racial, social, and/or environmental inequities. It is the enforcement team's goal to enhance the Central Coast Water Boards' ability to leverage its enforcement resources to achieve the general deterrence needed to encourage the regulated community to anticipate, identify, and correct potential non-compliance issues before they occur and to assist in finding opportunities for communities to build climate change resiliency. The enforcement team is also focused on making sure that the regulated community corrects violations and prevents them from occurring in the future and ensuring that non-compliant members of the public don't realize significant competitive economic advantage over compliant members of the regulated public.

Central Coast Water Board enforcement staff will continue to reevaluate enforcement priorities and provide an opportunity for the Central Coast Water Board and the public to provide feedback on the general enforcement priorities on an annual basis. The public and Central Coast Water Board members can also continue to provide input on enforcement actions taken by the enforcement team as part of the quarterly enforcement report updates.

ATTACHMENTS

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

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