



EXECUTIVE OFFICER'S REPORT • April 2021
Covers February 16, 2021 – March 15, 2021

Contents

| | |
|--|----|
| 1. Personnel Report – <i>Eric Shay</i> | 1 |
| 2. Standing Item – Quarterly Violation Report – 4th Quarter 2020 – <i>Rob Tucker</i> | 2 |
| 3. Lessons Learned: Emergency Response to Abandoned Sunken Vessels – <i>Kerri O’Keefe</i> | 3 |
| 4. Water Board Receives Funding Award and New Position to Expand Harmful Algal Bloom (HAB) Program – <i>Sabrina Rice</i> | 4 |
| 5. El Paso Monitoring Well Drill Site in the Indian Wells Valley Groundwater Basin – <i>Tom Browne and Anna Garcia</i> | 5 |
| 6. Palmdale Water District – Virtual Let’s Talk H2O! – <i>Anna Garcia</i> | 8 |
| 7. Standing Item – Annual Water Quality Assessment Report for Onsite Wastewater Treatment Systems – <i>John Morales</i> | 10 |

State and Regional

1. Personnel Report – *Eric Shay*

New Hires – None

Promotions

- Sabrina Rice, Environmental Scientist, Non-Point Source Unit, South Lake Tahoe. This position will assist with the implementation of the Freshwater and Estuarine Harmful Algal Bloom Program to satisfy a legislative mandate related to harmful algal blooms (HABs). The incumbent will work closely with waterbody operators/owners, county environmental health department staff and public health officers, tribes, non-governmental groups, and the public to respond to HABs; develop ongoing monitoring programs; post health advisories at recreational waterbodies; and increase community awareness of HABs.

Vacancies

- C.E.A. (Career Executive Assignment) to serve as the Region’s Assistant Executive Officer.
- Environmental Scientist, Forestry / Dredge & Fill Unit, South Lake Tahoe. This position will engage in permit development and/or enrollments under the

Lahontan Timber Waiver, Clean Water Act section 401 Water Certification for activities in Waters of the U.S., dredge and fill permits for Waters of the State, environmental document preparation or compliance for projects where the LRWQCB is a lead or responsible agency under CEQA, and regulatory actions as needed.

- Environmental Scientist, Regulatory and Enforcement Unit, South Lake Tahoe. The position is being considered for reclassification to Water Resource Control Engineer to provide support for Wastewater and NPDES permitting work.
- Water Resource Control Engineer, Wastewater & Agricultural Operations Unit, Victorville. This position provides regulatory compliance oversight to dairies and wastewater treatment plants located in the South Lahontan Basin.
- Engineering Geologist, Wastewater & Agricultural Operations Unit, Victorville. This is a new position authorized under SB 1215 (Hertzberg) legislation passed in 2018. The incumbent will work with economically disadvantaged communities that have onsite wastewater treatment systems (OWTS, or septic systems) that could be connected to a sewer system if they are within three miles of a system. The incumbent will also work with other small rural communities in need of upgrading their wastewater treatment systems.

Departures – None

2. Standing Item – Quarterly Violation Report – 4th Quarter 2020 – Rob Tucker

The Quarterly Violation Report for October 1, 2020 to December 31, 2020 includes (1) a brief summary of violations that occurred during the reporting period, and (2) an update on pending enforcement actions (see Pending Enforcement Cases table).

Synopsis of 4th Quarter 2020 Violations

Twenty (20) violations have been recorded for the fourth quarter 2020 reporting period (see 4th Quarter 2020 Violations Table), about 25 percent of the 88 violations recorded for the same quarter a year ago. The fourth quarter 2020 saw a significant drop-off in violations associated with landfills, mines, and facilities with surface impoundments. There was also a significant drop-off in effluent limitation violations associated with domestic wastewater treatment facilities and fish hatcheries comparing the fourth quarter 2020 to the fourth quarter 2019.

The fourth quarter 2020 also recorded eight (8) fewer violations than the 28 violations recorded for the previous quarter. The majority of the violations were failure to submit required self-certifications for the NPDES Industrial Storm Water Program and failure or late submission of self-monitoring reports from wastewater treatment facilities. Water Board staff were also more active during the 4th quarter 2020 responding to 80 percent of the violations with informal enforcement actions and continuing to follow up.

Attachments: A - 4th Quarter 2020 Violations Table
B - Pending Enforcement Cases

3. Lessons Learned: Emergency Response to Abandoned Sunken Vessels – Kerri O’Keefe

On January 20, 2021, the Lahontan Water Board received notification from the California Office of Emergency Services (Cal OES) of a potential release of petroleum from a sunken vessel in Lake Tahoe near Jameson Beach (CalOES Control #21-0314), South Lake Tahoe. United States Coast Guard (USCG) was the first agency to respond and determined that there was no petroleum release occurring. Later reports indicated the vessel had been abandoned for approximately two years on a privately-owned mooring and there was no identifiable responsible party. Without an identifiable responsible party (RP), responding regulatory and law enforcement agencies started evaluating agency options for removing the vessel.

The Water Board, California Department of Fish and Wildlife, United States Environmental Protection Agency (US EPA), and El Dorado County Sheriff’s Department all have programs that can be implemented to address abandoned boats, with implementation being more complex for some programs than others. In this case, the Water Board’s and US EPA’s programs were enacted.



Photo No. 3.1 - High Sierra Marine preparing to tow the sunken boat from Jameson Beach to Tahoe Keys Marina

The Water Board was able to obtain funding from the State Water Resources Control Board’s (State Water Board) Cleanup and Abatement Account (CAA). US EPA was able to obtain funding from the Oil Spill Liability Trust Fund. The two agencies subsequently agreed that US EPA would take lead on the boat removal, given that US EPA was ready to move forward with boat removal operations a day or two before the Water Board was.

On February 23, 2021, the sunken boat was partially floated and towed by High Sierra Marine to the Tahoe Keys Marina. Petroleum absorbent materials were deployed during the entire operation in case any fluids were released during the removal operation, which did not occur. On February 24, 2021, the boat was removed from the water and transported by Walker Marine to the South Lake Tahoe Refuse facility in South Lake Tahoe for disposal.

The Lahontan Water Board is currently working with the US EPA to secure an agreement to obtain reimbursement of future costs from the OSLTF that are accrued during salvaging of sunken vessels that pose an immediate threat to water quality when no RP can be identified.

The responding agencies will be meeting to conduct an after-action review, and to share information regarding each agency's options and processes for responding to similar situations. The review will help the agencies improve response efforts in the future.



Photo No. 3.2 - Recovered boat being lifted out of the water at Tahoe Keys Marina

4. Water Board Receives Funding Award and New Position to Expand Harmful Algal Bloom (HAB) Program – Sabrina Rice

Regional HAB Proposal

Early this year, after determining that the Lahontan Water Board's (Water Board) project proposal aligned with a recent legislative mandate ([Assembly Bill 834](#)) to create and implement a Freshwater Harmful Algal Bloom Program (FHAB), the State Water Board

(State Board) awarded the Water Board \$66,478 to support HAB monitoring and research studies for fiscal year 2021-2022. The funding will be used to support the analysis of samples for determining the presence and abundance of cyanobacteria and cyanotoxins related to HABs. After more consideration, the Water Board was awarded an additional \$5,000 to support analysis of chlorophyll-a in water samples.

The funding award will support (1) the assessment of new and recurring blooms (2) a regional special study to evaluate the effectiveness of a non-chemical control measure for nuisance blooms of algae and cyanobacteria, and (3) the development of risk criteria that can be used to predict incidence of HABs for high-elevation lakes.

The work being covered under the proposal includes a continuation of HAB research and monitoring efforts that started in 2019, and which were made possible in part with FY19-20 and FY 20-21 funds allocated from the SWAMP FHAB Program. Regional SWAMP funds, which were dedicated to this project in 2019, will continue to fund nutrient analysis associated with these monitoring efforts.

To optimize limited resources, the Lahontan Water Board realizes the value in collaborating with partner agencies to build an effective and efficient regionwide HAB response program to ensure protection of human and animal health at recreational waters. A portion of the funding will be dedicated to supplement volunteer HAB monitoring, already being implemented by regional partners including Alpine Watershed Group; Eagle Lake Guardians; United States Forest Service; South Tahoe Public Utility District; Tahoe Keys Property Owners Association; and Mono, Inyo, and San Bernardino County Environmental Health Departments. Additionally, the funding will help expand our surveillance and understanding of HABs throughout the region by reaching out to new partners.

The Water Board's proposal that received funding was consistent with regional and statewide priorities identified in the State Board's 2020- 2025 Nonpoint Source Program Implementation Plan. Additionally, the proposal supports the State Board's FHAB Monitoring and Response Program Implementation Plan.

New Hire

To support implementation of AB 834, the State Board prepared and received approval for a Budget Change Proposal that funds five staff positions statewide to handle HAB related program, planning, and response needs. One of the positions was allocated to Lahontan Water Board, and former scientific aid Sabrina Rice, will fill this role starting on March 22, 2021.

South Lahontan Region

5. El Paso Monitoring Well Drill Site in the Indian Wells Valley Groundwater Basin – *Tom Browne and Anna Garcia*

On February 16, 2021, Lahontan staff members Tom Browne and Anna Garcia visited the El Paso monitoring well drill site in the Indian Wells Valley (IWW) groundwater basin. Jean Moran, Senior Hydrogeologist with Stetson Engineers, Inc., consultants to the Indian Wells Valley Groundwater Authority (IWWGA), provided access to the drill site and an onsite tour. The drill site is located in the El Paso area of the groundwater basin,

about 8 miles south of Inyokern and ½ mile east of California State Highway 14 (see Figure 5.1).



Figure 5.1 - Location of the Department of Water Resources (DWR) Technical Support Services (TSS) El Paso monitoring well drill site within the Indian Wells Valley groundwater basin (outlined in blue).

The IWV is a critically overdrafted basin; all groundwater basins use year 2015 as their baseline groundwater extraction year according to the Sustainable Groundwater Management Act (SGMA). Stetson Engineers have modeled the water balance and have reported the basin's sustainable yield is 7,650-acre feet/year (AFY). In 2015, outflows from the basin included evapotranspiration at 4,850 AFY, interbasin subsurface flow at 50 AFY, and groundwater pumping at 27,740 AFY, totaling 32,640 AFY. By subtraction of total outflows of 32,640 AFY from total inflows of 7,650 AFY, the basin is overdrafted by 24,990 AFY.

According to the IWV Groundwater Sustainability Plan, the El Paso area located in the southern portion of the groundwater basin is a data gap area with only a few existing monitoring wells. The El Paso monitoring well will help to better characterize aquifer properties, aquifer structure, groundwater volume, and inter-basin recharge coming into the south end of IWV. The monitoring well site is located on land managed by the U.S.

Bureau of Land Management (BLM) and the well is planned to be a nested monitoring well with three well casings set in the same borehole. The proposed well screen depth intervals are 320 feet below ground surface (bgs), 820 feet bgs, and 1,320 feet bgs.

The work is being completed for the IWVGA, the Groundwater Sustainability Agency (GSA) for the basin, through the Department of Water Resources (DWR) Technical Support Services (TSS) Program. The TSS Program offers support to GSAs by providing funding and services including monitoring well installation, geologic logging, borehole geophysical logging, borehole video logging, and groundwater level monitoring training. The TSS Program prioritizes requests from basins in critical overdraft.



Figure 5.2 - Breaking down equipment after geophysical logging of the El Paso monitoring well borehole in the Indian Wells Valley Groundwater Basin. View looks east toward the El Paso Mountains.

DWR contracted with Gregg Drilling for monitoring well drilling and installation activities. The borehole was advanced to 1,500 feet bgs using direct mud rotary drilling techniques. While Lahontan staff members were onsite, the drill crew completed removal of drill pipe from the borehole and Pacific Surveys completed geophysical logging of the borehole. Geophysical logging provides data on geologic formations encountered in the borehole, including location depths of sand and clay layers. The information from borehole geophysical surveys is generally used to refine monitoring well design and selection of final well screen depth intervals.

As a side note, meetings of the GSA have been contentious since its formation (see previous EO articles). SGMA requirements has the four largest users including the agricultural growers (mostly pistachios), the China Lake Naval Air Warfare Center, the Indian Wells Valley Water District, and Searles Valley Minerals located in Trona vying with each other during IWVGA meetings.

Fees associated with the IWVGA include a Groundwater Extraction Fee of \$105 per acre foot and a Basin Replenishment Fee of \$2130 per acre foot. The collected

Groundwater Extraction Fees fund development of the Groundwater Sustainability Plan, monthly reporting of groundwater pumping data, and program administration by the IWVGA, the groundwater sustainability agency. The Basin Replenishment Fees provide funding for the Shallow Well Mitigation Project in the basin and helps to purchase imported water. Basin Replenishment Fees currently do not include collection of funds for infrastructure that will be needed to deliver imported water to the basin; as such, the IWVGA will need to consider additional funding sources.

6. Palmdale Water District – Virtual Let’s Talk H2O! – Anna Garcia

Water Board staff attended a virtual meeting presentation of “Littlerock Reservoir: After the Bobcat Fire,” hosted by the Palmdale Water District (PWD) on February 24, 2021. The PWD service area is located in the Antelope Valley along the northern foothills of the San Gabriel Mountains. The 2020 Bobcat Fire burned areas of the San Gabriel Mountains that had not burned in the last 50 years. The PWD has initiated work to monitor and mitigate potential impacts to the Littlerock Reservoir from upgradient Bobcat Fire burn area.

The Littlerock Dam was completed in 1924 with a water storage capacity of 4,200-acre feet. Sediment accumulation over 70 years reduced the reservoir capacity and, in 1994, the dam was renovated to raise the spillway and improve seismic safety. The renovations also restored capacity to 3,500-acre feet. However, additional sediment accumulation since the 1990s has reduced the capacity to about 3,000-acre feet. In 2018, the Water Board issued a Clean Water Act, section 401 Water Quality Certification authorizing PWD to remove up to 1.1 million cubic yards of built up sediment and to restore reservoir capacity; that project is still ongoing.

Surface water runoff from the watershed enters Littlerock Reservoir and is eventually transferred to Palmdale Lake through a 48-inch diameter underground pipeline. Water from Palmdale Lake is treated at the PWD water treatment plant for distribution to PWD customers. Water from Littlerock Reservoir provides roughly 10% of the water supply for PWD, and water quality from the reservoir is sampled monthly.

The Bobcat Fire started on September 6, 2020 and burned 60% of the 64-square mile Littlerock Watershed (Figure 6.1). Increased sedimentation from wildfires can affect water quality characteristics including color, sediment concentration, settleable materials, suspended materials, and turbidity. These impacts can also increase water treatment costs.

PWD is expecting ash from the Bobcat Fire to enter the Littlerock Reservoir and in anticipation of debris flows, the district is implementing emergency sediment removal activities. The Water Board authorized the emergency sediment removal activities in February 2021 under the United States Army Corps of Engineers Regional General Permit No. 63, which specifically authorizes these types of emergency related activities. PWD expects to remove 19,000 cubic yards of material from the reservoir by the end of March 2021.

PWD has partnered with the USGS to initiate a study of the impacts from the Bobcat Fire on the Littlerock Reservoir (Figure 6.2). The USGS will install time-lapse cameras to monitor debris flows, a suite of water quality monitoring sensors to document the

quality of the runoff from the watershed, and a pump sampler at the Little Rock Creek gage site to monitor inflow into the reservoir. Data collected will be shared with the district, the public, and the study findings will be published by the USGS in a final, peer-reviewed scientific report.

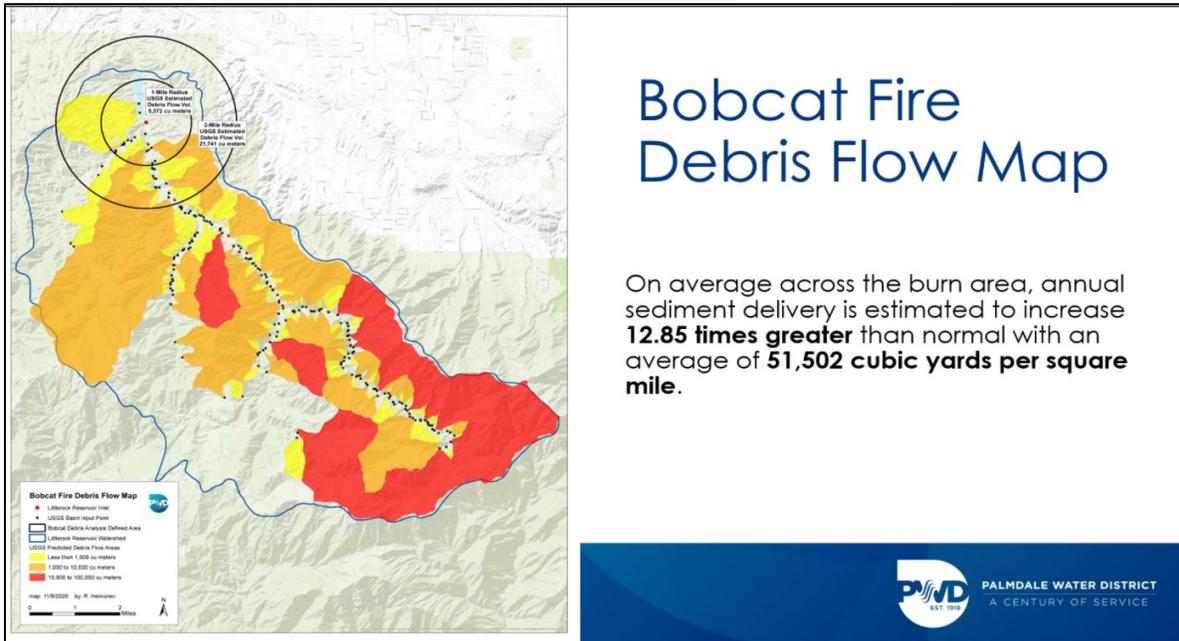


Figure 6.1 - Slide from Palmdale Water District presentation showing Bobcat Fire Debris Flow Map. Littlerock Reservoir is shown in the top left corner of the map.



Figure 6.2 - Slide from Palmdale Water District presentation showing information on the upcoming USGS study.

During the question and answer section of the presentation, a member of the public asked when the Littlerock Recreation Area will be reopened. Dennis LaMoreaux, PWD General Manager, noted that the area has been closed by the United States Forest Service (USFS). The USFS has closed the Bobcat Fire Area of the Angeles National Forest through April 1, 2022 (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd822448.pdf).

Another member of the public asked if outside funding is supporting any of the work. Scott Rogers, PWD Engineering/Grant Manager, reported that the State of California is providing some funding for sediment removal during the first year of the project. The funding is provided through the Antelope Valley Integrated Regional Water Management Group.

Regarding a question on how long the Bobcat Fire would affect water quality in the area, Dennis LaMoreaux, PWD General Manager, said it will depend and noted that it took 10 years for total organic carbon (TOC) in the reservoir water to return to normal levels after the Station Fire of 2009.

7. Standing Item – Annual Water Quality Assessment Report for Onsite Wastewater Treatment Systems – John Morales

This item provides an annual water quality assessment status and performance of the State Water Resources Control Board's (State Water Board's) *Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems* (OWTS, or septic systems), or OWTS Policy. The purpose of the OWTS Policy is to protect water quality and public health while allowing the use of OWTS using local agency permitting to the extent allowed by the OWTS Policy. No funding or staff resources are provided to implement this program.

The most important aspect of the OWTS Policy is that it waives the need to file a report of waste discharge for all OWTS regulated under the policy, thus establishing that OWTS discharges are effectively regulated under the California Water Code. The OWTS Policy establishes a five-tiered approach (Tiers 0-4) for the regulation and management of OWTS installations and replacements. The design of new and replacement OWTS under statewide minimum Tier 1 requirements allows local agencies to permit OWTS with an influent flow rate not to exceed 3,500 gallons per day (GPD). Local agencies that have a Water Board approved Tier 2 Local Agency Management Program (LAMP), may permit OWTS with an influent flow rate not to exceed 10,000 GPD. The OWTS Policy requires all OWTS discharges not covered under the policy to be regulated by Waste Discharge Requirements issued by the Water Board. Local agencies may refer OWTS projects to the Water Board at their discretion.

A brief description of the OWTS Policy Tiers is contained in Table 7.1.

Reporting

The OWTS Policy requires all local agencies permitting OWTS to submit annual reports by February 1 for local agency permitting and enforcement activities conducted during the prior year. Tier 2 local agencies with approved LAMPS must submit a Water Quality Assessment Report every five years after LAMP approval. Four local agencies in the

Lahontan Region have not submitted their 2020 annual reports as of mid-March 2021. Table 7.2 summarizes the status of non-submittal of the 2020 annual reports for certain local agencies.

Table 7.1 – OWTS Policy Tiers

| Tier | Description of Tier | Effect in Lahontan Region |
|------|--|--|
| 0 | Existing OWTS functioning properly | Applies to most existing OWTS |
| 1 | Statewide standards for OWTS siting, design, operation, and maintenance | Applies to two local agencies issuing OWTS permits without a LAMP (cities of Adelanto and Victorville) |
| 2 | Local agencies that permit OWTS with LAMP that may have different than the statewide standards | Applies to 16 local agencies issuing OWTS permits with an approved LAMP, primarily new and replacement systems |
| 3 | OWTS in surface watersheds impaired by nutrients or pathogens | None currently in Region 6 |
| 4 | Failed existing OWTS | When local agency required corrective actions are completed, OWTS returns to Tier 0 |

Table 7.2 – Summary of Non-Submittal of 2020 Annual Reports

| Local Agency | Comment |
|---------------------|---|
| Lassen County | The County has been short-staffed affecting the on-time submittal of the annual report. The County intends to submit their annual report as soon as possible. |
| Los Angeles County | The Los Angeles Water Board is the lead region. The County has been affected by COVID-19 and requested more time stating that they will submit their annual report as soon as possible. |
| City of Victorville | The 2020 Annual Report is pending submittal. |
| City of Adelanto | Water Board staff has contacted City personnel via numerous e-mails and telephone calls, have not yet received a response, but continue to elevate our outreach to the City. |

GeoTracker Uploads

Water Board staff recently created GeoTracker database sites for local agencies to upload their annual reports. Water Board staff notified all local agencies to begin submitting their annual reports directly into GeoTracker, starting with the 2020 annual report.

This is an appreciable task completed by Water Board staff. It will facilitate Water Board staff's ability to better track annual report submittals. Completion of this task has been very challenging because knowledge and ease of maneuvering in the GeoTracker database varies among local agencies. Some local agencies need basic training on GeoTracker uploading; whereas, other local agencies are more familiar and are able to

eventually upload annual reports. Water Board staff has provided guidance to local agencies.

Water Board staff is sharing this successful and effective procedure to facilitate annual report uploads with other Regional Boards throughout the state and provided a virtual presentation on how to set up the database for this report uploading procedure. We are working with the State Water Board staff to create a GeoTracker report for statewide tracking of who has submitted annual reports.

Accessory Dwelling Units

To address the lack of affordable housing, the State of California has promoted accessory dwelling units (ADUs). These are additional, limited occupancy units added to existing or new single-family homes, sometimes called an “in-law unit.” The CA Department of Housing and Community Development (CA HCD) provides broad oversight implementation of this requirement and has recently established criteria for a sub-category called junior accessory dwelling units (JADUs), which are affordable housing options of smaller size.

The issue with ADUs or JADUs in suburban or semi-rural parts of the Lahontan Region is additional groundwater loading from OWTS discharges where sanitary sewer collections systems are not available. This additional groundwater impact was not considered when the state mandates were established.

ADUs and JADUs are frequent topics of discussion with local agencies. The CA HCD standards for local agency permitting of ADUs (< 1,200 square feet) and JADUs (<500 square feet) do not address increased flow and local agencies are requesting Water Board staff guidance to be consistent with the requirements of the OWTS Policy.

The Basin Plan establishes that senior citizens’ dwelling units and second units, as defined in Government Code Sections 65852.1 and 65852.2 will not be considered as additional dwelling units. For this reason, ADUs and JADUs are allowed to be placed on septic systems.

Increased loading may be contradictory to the Basin Plan and LAMPs for some local agencies. This presents a challenge for local agencies to allow the permitting of ADUs and JADUs while also complying with septic tank loading and lot area requirements within their LAMPs and the OWTS policy. The long-term impact to increased loading to groundwater from ADUs on OWTS in the Lahontan Region is unknown but would be localized.

Programmatic Assessment for San Bernardino County

Water Board staff intends to begin meeting with local agency staff to evaluate the local agency OWTS permitting program and discuss other issues of interest such as ADUs.

In February 2021, staff met with County of San Bernardino staff. The discussion included the Lahontan, the Colorado River Basin, and the Santa Ana Regional Water Quality Control Board staff; Environmental Health Services, Building and Safety and the Land Use Services Departments staff from San Bernardino County. Topics discussed included OWTS inspection procedures, complaints, failures, grease interceptors, the Crestline and Lake Arrowhead Exemption Order Criteria, ADUs, reporting period, and

the 5-Year Water Quality Assessment Report. Only San Bernardino County has been providing annual reports on a fiscal year basis. Staff requested they provide information on a calendar year basis consistent with all other local agencies. Some information is provided for the county as a whole, while other information is reported by regional board, making it difficult to compare activities within each region consistent with all other local agencies within the region.

The Basin Plan includes OWTS prohibitions within certain areas of the San Bernardino Mountains. The Water Board's Crestline Exemption Order (6-81-3) and Lake Arrowhead Exemption Order (6-84-93) were adopted to provide the County of San Bernardino with exemption criteria for the installation of OWTS in these areas. These orders established criteria allowing exemptions for OWTS installation, reporting requirements of exemptions granted, and some sampling requirements for nearby streams.

Since adoption of Order Nos. 6-81-3 and 6-84-93, Crestline and Lake Arrowhead have established their own Community Service Districts. These communities no longer fall under San Bernardino County jurisdiction. Additionally, San Bernardino County staff were unaware of the existence of these orders.

Consequently, the following action items were agreed to with San Bernardino staff:

- Staff requested conversion of reporting to a calendar-year basis consistent with all other Tier 2 entities making the next report cover an 18-month period.
- San Bernardino County staff may request future changes to the LAMP. For example, criteria for grease interceptor installations at food establishments that use OWTS.
- San Bernardino County staff will include information in the annual report for the number of ADUs and JADUs permitted. There are numerous activities that Water Board staff would like reported but are not required by the OWTS Policy, such as lot size, design flow, geographic coordinates, and number of ADUs.
- Consider including the prohibition exemption requirements in the LAMP along with future reporting of exemptions granted.

Other Programmatic Assessment Issues

Part of the discussions planned with local agencies include the Regional Board jurisdiction overlap. Some local agencies, such as Kern, Los Angeles, and San Bernardino Counties, and others, encompass multiple regions. For each county, one Water Board is assigned as the lead region. The local agency submits annual reports only to the lead Water Board. Staff from other regions have difficulty obtaining annual reports in jurisdictions where annual reports are submitted to another agency.

The City of Adelanto is the only agency that has not submitted any annual reports and has been unresponsive to Water Board staff requests for a meeting. Water Board staff has made numerous attempts to reach-out to the City of Adelanto to discuss their annual report submittals. We will continue with our efforts to meet with City of Adelanto staff.

All Tier 2 entities with approved LAMPs must submit a 5-Year Water Quality Assessment report after LAMP approval and every five years thereafter. San

Bernardino County is the first jurisdiction required to submit a 5-Year report, due in February 2023. Staff will continue meeting with San Bernardino County, and other Tier 2 entities, regarding development of these reports.

Water Board staff are requesting the State Water Board geographic information system (GIS) staff create spatially referenced data layers of the Lahontan Basin Plan OWTS system prohibition areas. These data layers will be useful for the 5-Year Water Quality Assessment reports and other mapping projects.

A long-term goal will be development of sanitary sewer collection systems maps showing areas where sewer services are available with respect to facilities on OWTS. To support this effort, Water Board staff intend to request any available spatially referenced data (e.g., shapefiles, computer aided drafting drawings, kmz files). These data layers will be useful in the sewer consolidation program that staff is developing.

4th Quarter 2020 Violations Table

Attachment A

| Violation Program | Priority | County | Responsible Party | Facility | Violation Description | Corrective Action | Enforcement Action |
|---|----------|--|--|---|---|---|--|
| Cannabis Program | A | Los Angeles | Ramiro Villa Avila | 3060-020-043, Avila | Enforcement Action - Failure to submit report required by Cleanup and Abatement Order | None | Notice of Violation |
| NPDES Industrial Storm Water Program | B | El Dorado, Los Angeles, and San Bernardino | Multiple (5 parties) | Multiple (5 facilities) | Failure to submit Notice of Non-Exposure Certification | Submitted Notice of Termination (1); None (4) | Notice of Violation (5) |
| NPDES Construction Storm Water/ Dredge and Fill Programs | B | El Dorado and Placer | El Dorado County Dept. of Transportation; and Stonebridge Properties LLC | South Tahoe Greenway Trail Project; and Coldstream Development Project (2 violations) | South Tahoe Project - Deficient BMPs; Coldstream Project - Deficient BMPs and soil disturbance during prohibition period. | BMP improvements and ceased soil disturbance activities | South Tahoe Project - Staff Enforcement Letter; Coldstream Project Notice of Violation |
| Wastewater Treatment Facilities | B | Inyo, Mono, and San Bernardino | Multiple (7 parties) | Multiple (7 facilities, 8 violations) | Late or non-submittal of self monitoring reports | None | Oral Communications or Staff Enforcement Letters (4) |
| Land Disposal | B | San Bernardino | 3 parties | Three facilities/ violations | Exceeded a water quality standard. Inadequate monitoring. Late report submission | None | Oral communication (1) |

**Pending Formal Enforcement Cases
March 21, 2021**

| Facility | County | Enforcement Action | Current Status | Next Step |
|--------------------------|----------------|--|--|--|
| Executive Officer | | | | |
| VVWRA | San Bernardino | ACL - Settlement (Mandatory Minimum Penalties) | Proposed Settlement available for public comment through April 2, 2020. | Advisory Team to review public comments and either submit questions/comments to the Prosecution Team and VVWRA, or make final recommendation for Executive Officer/Water Board consideration. [2nd Quarter 2021] |
| Prosecution Team | | | | |
| Bijou Marketplace | El Dorado | Expedited Payment Letter (Mandatory Minimum Penalties) | Preparing Expedited Payment Letter. | Issue Expedited Payment Letter. [2nd Quarter 2021] |
| Park Livestock Company | Mono | ACL Complaint | Preparing ACL Complaint in response to unauthorized discharge of fill to West Walker River. | Issue ACL Complaint. [2nd Quarter 2021] |
| Tahoe Keys Marina | El Dorado | Expedited Payment Letter (Mandatory Minimum Penalties) | Preparing Updated Record of Violations/Notice of Violation for storm water discharges through the end of 2020. | Issue Updated Record of Violations/Notice of Violations. [2nd Quarter 2021/] |