



Audit of Water Use Permit Compliance

Project #23-16

Prepared by
Office of the Inspector General

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SOUTH FLORIDA WATER MANAGEMENT DISTRICT

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October 8, 2026

Governing Board Members

Re: Audit of Water Use Permit
Compliance - *Project No. 23-16*

This audit was performed pursuant to the Inspector General's authority set forth in Chapter 20.055, F.S. Our audit objective primarily focused on determining whether the District is adequately monitoring water use permits to ensure that permit holders are complying with special permit conditions. Jankie Bhagudas and I prepared this report.

Sincerely,

A handwritten signature in blue ink that reads "J. Timothy Beirnes".

J. Timothy Beirnes, CPA
Inspector General

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BACKGROUND

In accordance with the Office of Inspector General's Audit Plan, we conducted an Audit of Water Use Permit Compliance.

The District regulates and manages the consumptive use of water through consumptive use permits. The Regulation Division's Water Use Bureau is responsible for issuing consumptive water use permits and monitoring compliance with the permit requirements. The Water Use Compliance Unit is responsible for monitoring compliance with permit conditions. Water use permits are issued pursuant to Chapter 373, Part II, Florida Statutes, which requires District staff to ensure that proposed uses are reasonable and beneficial; will not interfere with any existing legal uses; and is consistent with the public interest. A consumptive water use permit (water use permit) allows the permit holder to withdraw a specified amount of water from the ground, or a canal, lake or river (surface water) for reasonable-beneficial uses. Consumptive water use permits require water conservation to prevent wasteful use, including the reuse of reclaimed water (treated wastewater) where available. The permits also set limits on how much water can be withdrawn at each location in an aquifer or from surface water. These limits protect existing legal users' water supplies and protect water sources from harm due to saltwater intrusion, and surface water sources from drying up. Water can be used for the following:

- public supply (drinking water),
- agricultural and nursery plant irrigation,
- golf course irrigation,
- commercial use, and
- mining activities and power. It should be noted that dewatering permits do not receive allocations and generally water is recharged locally.

Unless expressly exempt by Florida Statutes or District rule, a water use permit must be obtained prior to any use or withdrawals; however, no permit is required for water for domestic use at a single family dwelling or duplex provided that the water is obtained from one withdrawal facility for each single family dwelling or duplex or for water used strictly for fire fighting purposes.

Consumptive water use permits are divided into three classes. The following is a brief description of each class.

General Permits By Rule: These permits are issued pursuant to Section 373.223, Florida Statutes, and Chapter 40E-2.061, Florida Administrative Code (F.A.C.). Examples of general permit by rule are as follows:

- Landscape irrigation usages at a single family / duplex dwelling. Includes home lawn, ornamental irrigation, car washing, and other incidental uses.
- Short-term dewatering; for example, well pointing, utility or lake construction, exploratory testing, aquifer performance tests. It should be noted that certain criteria must be met; for example, a maximum daily pumpage of less than 5 million gallons and a maximum total project pumpage of less than 100 million gallons over a one-year period. Criteria are in accordance with Subsection 40E-2.061(2), F.A.C.
- Closed-loop systems; for example, cool / heating systems for swimming pools and air conditioning units providing certain criteria are met; such as withdrawal facility cannot be used for any other type of consumptive use.

Noticed General Permits: These permits are required for projects meeting certain allocation, facility, and/or source conditions per Chapter 40E-2.071, F.A.C. Most noticed general permits do not have monitoring requirements; thus, monitoring is not usually required by Water Use Compliance Unit staff. Examples of noticed general permit criteria are as follows:

Allocation Requirements

- Cumulative average daily water use is less than 100,000 gallons per day on an annual basis.
- Usage does not exceed an annual average allocation greater than or equal to 300,000 gallons per day for irrigation purposes within the South Dade County Water Use Basin.
- Usage does not exceed an annual average allocation greater than or equal to 10,000 gallons per day within the Lower Tamiami, Sandstone, and Mid-Hawthorn aquifers.

Facility Requirements

- Cumulative withdrawal capacity of less than 1 million gallons per day.
- Groundwater wells are less than eight inches in diameter.
- Surface water facilities with a cumulative intake diameter of less than six inches.

Individual Permits: These permits are required for all uses that do not qualify for a permit by rule or a noticed general permit. Examples of the uses of individual permits are as follows:

- Irrigating golf courses, crops with either well or surface water usage, nursey stock, and residential landscaping with multiple wells and pumps.
- Watering livestock with water from a well, pump, or culvert.
- Withdrawal for industrial or public water supply uses.
- Use of reclaimed water stored in an unlined lake.

Water use permits include standard conditions and special conditions. Standard conditions contain general information and operational constraints that generally apply to all water uses unless waived or modified by the District upon a determination that the conditions are inapplicable to the use authorized by the permit.

Standard permit conditions for all water use permits include but are not limited to the following:

- Authorized water use is required to be implemented in accordance with permit conditions.
- Permit holders are required to obtain all necessary federal, state, local and special district authorizations.
- If any permit conditions are violated, the permits may be subject to review and modification, enforcement action, or revocation pursuant to Chapter 373, F.S.

Special conditions vary among use classes, sources, geographic locations, and other permit-specific factors; thus, not all special conditions are imposed on each permit. The Water Use Compliance Unit's staff is comprised of scientists and environmental analysts who are required to monitor each permittee's compliance with relevant permit special conditions. Special conditions may require a permittee to submit specific data to the District at specified intervals. Compliance with special conditions include a determination of the following, if applicable

- Whether any calibration reports, water use (pumpage) data, and monitoring data are past due.
- Evaluation to determine the following:
 - Whether water allocations have been exceeded.
 - Whether a 1:1 recharge requirement is being exceeded or not being met.
 - Whether chloride data is showing an increasing trend or has exceeded a specific value stated in the permit.
 - Whether there is a change in trend for water level data or is water level data below a specific value stated in the permit.

- Whether there are any other issues; such as past due reports (e.g. 10-year compliance report), wetland issues, non-compliance with operating plan, and unpermitted facilities.

In addition, compliance staff also conduct site inspections to determine compliance and document project activities, withdrawal facilities, and unpermitted uses of water.

As of May 19, 2025, there were 24,519 water use permits which have been allocated to use an average of approximately 3,905 million gallons of water per day. As shown in the table below, the Water Use Bureau monitors 3,526 of the 24,519 active water use permits. It should be noted that individual permits have been allocated over 3,889 million gallons of water per day with the most allocations to agricultural and public water supply.

Population of Water Use Permits as of May 19, 2025 <i>Source: Water Use Bureau</i>			
Permit Type	Number of Permits	Annual Allocation (millions of gallons)	Monitoring Requirements
Noticed General	19,877	5,947 MG	Monitoring is not required except for a small number of permits
Short Term Dewatering	1,116		Monitoring not required
Total	20,993		
Individual	3,277	2,740,911 MG	Monitoring required
Long Term Dewatering	224		Monitoring required
Master Dewatering	25		Monitoring required
Total	3,526		
Total	24,519	2,746,858 MG	

The following table shows the distribution of individual water use permits by land use type and annual water use allocations.

Population of Individual Water Use Permits Land Use Type and Number of Permits, as of May 19, 2025				
Land Use Type	Number / Percentage of Permits		Annual Allocations (millions of gallons) / Percentage	
Landscape	1,257	38%	52,712	2%
Agricultural	738	23%	662,856	24%
Golf Course	226	7%	28,952	1%
Public Water Supply	138	4%	506,606	18%
Dewatering	119	4%	81,352	3%
Nursery	101	3%	5,410	<1%
Industrial	99	3%	320,105	12%
One or More Land Use Type	522	16%	979,483	36%
Other (e.g., Aquaculture and Commercial)	77	2%	103,436	4%
Total	3,277	100%	2,740,912	100%

The District utilized Pega to re-engineer the permitting portal. The intent of the Pega re-engineering of the permitting portal, which the WU compliance module is one of approximately 10 module deployments spanning from 2017 through present day, is to eliminate dependency on Oracle based platforms that are no longer supported by Oracle and hence pose significant security vulnerabilities. While a thorough evaluation supported the selection of the Pega platform, it was understood that it differed substantially from the legacy Oracle environment. Although Pega introduced more streamlined processes, the changes in business workflows, data collection/attributes, and differences in underlying technology have required, and will continue to require, additional efforts in data migration/clean-up and functional alignment following deployment to completely address and resolve outstanding issues.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our audit objective primarily focused on determining whether the District is adequately monitoring water use permits to ensure that permit holders are complying with special permit conditions.

To accomplish our objectives, we performed the following:

- Obtained an understanding of the water use permit compliance process by interviewing key personnel in the Water Use Compliance Unit.
- Reviewed relevant policies and procedures, e.g., Chapter 373, Part II, Florida Statutes; Chapter 40E-2, F.A.C.; Water Use Bureau's Compliance User Manual, and Applicant's Handbook for Water Use Permit Applications, June 2022. We also reviewed permit data maintained in the permitting portal's water use compliance module.
- Obtained and analyzed the population of water use permits, as of May 19, 2025. Our audit tests mainly focused on individual water use permits. We analyzed monitoring requirements and compliance analysts' permit assignments to determine whether permits requiring inspections were adequately monitored. We also analyzed individual water use permits' compliance status and monitoring actions, as of May 8, 2025, to determine whether permits were monitored as required. In addition, we determine whether noticed general permits were accurately classified. Our audit tests also included judgmental sample selections.
- Determined whether there was adequate enforcement actions against non-compliant water use permit holders.

We used judgmental sampling throughout the audit. Judgmental sampling was considered the preferred methodology based on consideration of the size of the various audit populations and characteristics, as well as audit efficiency and professional judgment. Judgmental audit sampling is a technique where auditors use their professional judgment rather than probability theory, to select specific, high risk, or material items from a population. Although the sample cannot be statistically projected to the populations from which the samples were selected, we believe the sample, along

with the results of the audit tests, provide reasonable assurance for us to determine whether there are adequate controls over water use permit compliance.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

AUDIT RESULTS

Executive Summary

Overall, the District has an adequate process in place to ensure that water use permits are monitored; however, in September 2024 the District launched a new water use compliance permitting module that was intended to increase compliance efficiency and effectiveness but instead resulted in several technical issues that hindered full implementation and compliance monitoring of some water use permits. Examples of unresolved issues impacting some permits include the following:

- Some permit holders are unable to submit required compliance data. In addition, some pumpage calculations cannot be performed.
- Individual water use permits were migrated as noticed general permits.
- Reassigning permits from one compliance analyst to another is currently a manual time-consuming process. As of September 2025, 520 individual permits are pending reassignments which means that no action were being taken to monitor compliance.
- Incorrect permit expiration dates which effect the automated calculations of the number of days until permit expiration are incorrect and may trigger early or overdue expiration letters to permit holders. We found that expiration dates for 233 individual permits and 3,285 noticed general permits were incorrect.

Our audit primarily focused on individual water use permits since these permits require monitoring. As of May 19, 2025, there were 3,277 individual permits comprising 2,558 (78%) compliant permits and 719 (22%) non-compliant permits. Our analysis disclosed several issues that should be addressed by the Water Use Compliance Unit, for example,

- 544 permits were not assigned to compliance analysts and did not have any permit monitoring requirements; these permits were classified as either medium or high priority permits. These priority classifications are incorrect.
- 156 permits with monitoring requirements were not assigned compliance analysts. Further, 123 (79%) were classified as either medium or high priority

permits. These permits could not be scheduled for inspections, since compliance analysts were not assigned.

- 32 permits with no monitoring requirements were assigned to compliance analysts. Some of these permits have expired. These permits should be reviewed to assess whether compliance analysts should be assigned.
- 137 permits have not been monitored since October 2024 and 383 permits since July 2025 because the assigned compliance analysts are no longer with the Water Use Compliance Unit. These permits are pending reassignments to other analysts. Inspections cannot be scheduled in the water use compliance module until new analysts are assigned to the permits.

In addition, our review of 47 individual permits classified as compliant disclosed that the compliance status of 22 was questionable for various reasons. Further, 404 individual permits that should have been inspected during September 2024 to May 8, 2025, were not inspected. Most of these permits were classified as medium and high priority. Reasons for non-inspections include no assigned compliance analyst and insufficient staff to adequately monitor permit compliance.

We also analyzed noticed general permits and noted some issues; for example, permits with no monitoring requirements were assigned to compliance analysts and were assigned medium and high priority levels, and some individual permits were migrated to the new water use compliance module portal as noticed general permits.

It should be noted that we previously audited the monitoring of water use permits in 2007 (Audit #07-27). We found that there were procedures in place to monitor permit compliance; however, procedures have not been fully implemented due to insufficient staff. We concluded that the required reports and monitoring data were submitted for only about 23 percent of permits with reporting requirements; routine monitoring and enforcing permit requirements conditions were often not possible due to other staff responsibilities. This audit disclosed some of the same issues. According to Water Use Compliance staff, data analysis by the Compliance Unit has been historically inadequate due to insufficient staffing. As of October 2025, ten compliance analysts are responsible for monitoring 2,540 permits with each analyst responsible for monitoring anywhere from 159 to 308 permits. In addition, two compliance analysts assigned 520 permits are

no longer with the unit, thus, the permits may have to be re-assigned to the ten existing analysts. The unit currently has two staff vacancies. One position is in the process of being filled and the other position in the approval process and the vacancy should be posted soon.

We made 27 recommendations to improve the monitoring of water use permits.

Issues with Permitting Portal's Water Use Compliance Module

In September 2024, the District launched the permitting portal's water use compliance module that is intended to increase compliance efficiency and effectiveness. Compared to the old portal, the new portal is intended to increase compliance efficiency and effectiveness, for example:

- Increased automated workflow; for example, inspections are created, closed, and tracked by the system. Permit assignments for each compliance analyst are automatically generated and are displayed on lists ("My Work"). Assignments are no longer required to be created manually in excel. The work list displays all assignments and due dates; for example, submittal reviews, inspections, and non-compliance process. In addition, compliance analysts can easily access the list of permits they are assigned and the list of assigned permits with overdue compliance data.
- Permittees can submit compliance reports by either entering the required data directly on the permitting portal's water use compliance module or using excel spreadsheets and uploading the results to the portal. In addition, current and past permit data along with due dates are not indicated in the portal and spreadsheets.
- Water Use Compliance Unit staff will have the ability to update templates as needed; for example, letters and permit conditions, instead of relying on the Information Technology Business Services Section to perform the updates. This feature is not yet available.

There have been several technical issues with some permits since the September 2024 launch of the water use compliance module. The Information Technology Business Services Section has resolved some issues; however, several issues are pending resolutions which the Water Use Compliance Unit has documented in a spreadsheet and is regularly updated to reflect resolutions and new issues. Based on discussions with Information Technology Business Services Section staff, some issues are related and could be resolved by refreshing permit data, while others will require additional time and effort to resolve. Our audit tests disclosed several of these issues that will be discussed in subsequent sections of the report. Issues include pumpage data submittals and

pumpage calculations which are considered critical. According to Water Use Compliance Unit staff, they performed minimal submittals and pumpage tests prior to the September 2024 launch of the new water use compliance module. Issues related to permits issued after the launch of the new portal are currently being addressed. Unresolved issues with the new module, as of October 2025, include the following:

- **Data Submittal Issues:** Since the September 2024 launch of the new water use compliance module, many permit holders have not been able to electronically submit required pumpage and other monitoring data using the permitting portal's water use compliance module. Staff could not quantify the number of permits with submittal issues. As a result, submittal statuses are not updated and pumpage calculations cannot be performed to determine compliance with permitted water usage allocations. In addition, compliance analysts have spent a lot of time assisting permit holders to resolve issues. Further, some submittal forms indicate incorrect due dates and pumpage and monitoring data requirements; for example, submittal forms may inaccurately indicate that permit holders do not have any outstanding data to be submitted or have outstanding data even though all submittals are up to date. In addition, in some instances submittal due dates are not updated to reflect current submittal due dates.

Permit holders are either waiting to submit data electronically or have submitted data using excel spreadsheets via mail or email. Some permit holders are documenting and maintaining their data and plan to submit all data when submittal issues are resolved. As a result, there will be a large backlog of data that will have to be entered by Water Use Compliance Unit staff when the submittal issues are resolved. As of September 2025, Water Use Compliance Unit staff have submittals for 42 permits to input in the portal that cannot be entered until submittal issues are resolved. Water Use Compliance Unit staff stated that in some instances permits are classified as compliant until submittal issues are resolved since the issues are District related. As a result, some non-complaint permits are classified as compliant; thus, the number of compliant and non-compliant permits may not be accurate, and the non-compliance process of notifying and working with permit holders to resolve non-compliant issues cannot

be complied with. Since pumpage and other data is critical to determine compliance, all submittal issues should be resolved.

- **Pumpage Calculations Issues:** The new water use compliance module was supposed to calculate and compare reported usage to permit allocations, however, due to data submittal issues pumpage calculations cannot be performed for some permits. Further, the module does not contain some historical data required for pumpage calculations because data did not migrate from the old permitting portal. Further, the system is not programmed to perform pumpage calculations and compliance staff have been spending time addressing this issue; for example, determining whether required pumping data migrated from the old system.
- **System Migration Issues:** Permit information for some permits either did not migrate or migrated inaccurately from the old permitting portal to the new permitting portal's water use compliance module. Examples of data migration issues included the following:
 - Permit applications and various other permits related data, for example, permit status, type, requirements, issue and expiration dates, and calibration dates.
 - Some individual permits migrated as noticed general permits which resulted in permit requirements not being loaded in the new water use compliance module. As a result, some permit holders were not notified to submit required data. According to Information Technology Business Services Section staff, these permits were incorrectly classified in the legacy system. In addition, permit requirements for some permits did not migrate to the new water use compliance module. Consequently, Water Use Compliance Unit staff had to compare the requirements in the old portal to the new module to determine whether permit requirements were accurately loaded in the new module. Migration issues are being resolved by the Information Technology Business Services Section. Since accurate data is required to determine permit compliance, all migration issues should be resolved.
- **Incorrect Data for some Permits Issued after the Launch of the New Water Use Compliance Module:** The new water use compliance module does not always

reflect accurate data for some newly issued permits; for example, expiration dates and facility details are sometimes incorrect, and allocation and calibration data are sometimes missing. The Information Technology Business Services Section does not plan to check all new permits for errors. Consequently, the Compliance Unit staff must compare the data in the old portal to the new water use compliance module and forward discrepancies to the Information Technology Business Services Section for correction.

- **Automated Notification Reminder to Permit Holders is Pending:** The new water use compliance module was supposed to be programmed to generate automated notification reminders for compliance analysts to remind permit holders when a 10-year compliance report letter will be required to be submitted to the Water Use Compliance Unit. This task has not been implemented. As a result, the Water Use Compliance Unit staff are manually generating the list of permits that will require a report soon and sending reminders to the permit holders.
- **Incorrect Expiration Dates:** According to Water Use Compliance Unit staff, numerous permits have incorrect expiration dates. As a result, the automated calculations of the number of days until permit expiration for some permits are incorrect and may trigger early or overdue expiration letters to permit holders. To address this issue Water Use Compliance Unit staff must manually verify expiration dates in both the old and new permitting portal to determine whether expiration notification letters to permit holders are required.

Our analysis disclosed that 3,994 permits were either missing expiration dates or expired prior to 2025. The results of our analysis are shown in the following table.

Analysis of Water Use Permits with Expiration Dates Before 2025 As of May 19, 2025					
Permit Status	Approved			Pending Expiration	Total
Expiration Dates / Permit Type	Expiration Dates				
	Missing Expiration Dates	1970 (Default Date)	1990 - 2020	2020 - 2024	
Individual		1	40	192	233
Long Term and Master Dewatering				71	71
Noticed General	114	627	203	2,341	3,285
Short-Term Dewatering				405	405
Total	114	628	243	3,009	3,994

According to Water Use Compliance Unit staff, expiration dates for some permits issued after the September 2024 launch of the water use compliance module are inaccurate in the new portal.

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- **Issues with Data Downloaded to Excel Spreadsheets:** There are issues with data downloaded from the water use compliance module to excel spreadsheets for analysis. The output data for some permits are sometimes incorrect and/or incomplete. Compliance analysts are not always able to download existing pumpage data onto excel spreadsheets that they need to perform analysis required as part of their compliance review; for example, output downloaded data may not include the complete data range requested.
- **Resolved-Expired Permits are Assigned to Compliance Analysts:** Expired permits are erroneously indicated on the compliance analysts' worklists as requiring actions; however, these expired permits should not appear on compliance analysts' worklists since actions by compliance analysts are not required.
- **Reassigning Permits from one Compliance Analyst to Another is a Manual Time-Consuming Process:** Reassigning permits and monitoring assignments from one analyst to another is an inefficient manual and time-consuming process. In instances where permits must be reassigned, the Water Use Compliance Unit supervisor must reassign each permit individually in the water use compliance module since the module does not have a feature where several permits can be reassigned simultaneously. Further, after a permit is assigned to a new compliance analyst, all pending tasks must also be manually assigned. In instances where compliance analysts have separated from the District or transferred to other District areas, monitoring activities cannot be performed until their assigned permits are reassigned to other compliance analysts. As of September 2025, 520 permits are pending reassignment. Thus, the permit compliance status reflected in the water use compliance module may not be accurate. Specifically, we found the following:
- A compliance analyst separated from the District in October 2024, however, as of September 2025, 137 permits remained assigned to the separated analyst. It should be noted that 100 of the 137 permits are individual water use permits; consequently, no compliance actions have been taken on the 100 permits since October 2024.

- In July 2025, a compliance analyst transferred to the Water Use Permitting Unit; however, as of September 2025, 383 permits were still assigned to the analyst. It should be noted that 334 of the 383 permits were individual water use permits; thus, no compliance actions have been taken on the 334 permits since July 2025.

According to Water Use Compliance Unit staff, there are also issues with the permitting portal's water use application module which results in incorrect permits data. Permit data does not always reflect the application data. As a result, Water Use Compliance Unit staff must compare both sets of data of all permits issued since September 2024 and make sure necessary corrections to permits, for example, correct expiration date, facilities, and special conditions.

Analysis of Individual Water Use Permits

Based on permit data provided by the Water Use Compliance Unit, there were 24,519 active water use permits, as of May 19, 2025. The permit types, compliance status and monitoring requirements are detailed in the following table:

Population of Water Use Permits Monitoring Requirements and Compliance Status As of May 19, 2025					
Permit Type	Monitoring Required	Complaint Permits	Non-Compliant Permits	Total Permits / Percentages	
Noticed General	No	19,827	50	19,877	81%
Short Term Dewatering	No	1,049	67	1,116	5%
Individual	Yes	2,558	719	3,277	13%
Long Term Dewatering	Yes	191	33	224	<1%
Master Dewatering	Yes	23	2	25	<1%
Total		23,648	871	24,519	100%

According to Water Use Compliance Unit staff, most of the noticed general permits do not require monitoring because they do not have active monitoring requirements. Specifically, 19,672 of the 19,877 permits did not have any monitoring requirements. However, our audit tests disclosed a few issues with noticed general permits; which will be discussed in a separate section of our report. As shown in the table above, a small number of noticed general permits were non-complaint. Further, Water Use Compliance Unit staff stated that short-term dewatering permits are not monitored; however, we found that 67 permits were classified as non-compliant. These permits were classified as low priority and had active requirements. As a result, the Water Use Compliance Unit staff should determine whether the non-compliant statuses are correct, take adequate steps to resolve non-compliance issues and update the compliance status reflected on the water use compliance module, as needed.

Based on our analysis of the water use permits population, we primarily focused audit tests on individual permits since these permits comprise 93% of all permits that require monitoring of conditions to ensure compliance. As of May 18, 2025, there were 3,277 individual water use permits, and we determined the following:

- 2,558 (78%) permits were compliant
- 719 (22%) permits were non-compliant
- 761 (23%) permits were not assigned to a compliance analyst
- 637 (19%) permits did not have any monitoring requirements, which typically indicates that a compliance analyst would not be assigned to monitor compliance.

Additional detailed analysis disclosed the following:

- Compliance analysts were not assigned to permits with monitoring requirements.
- Compliance analysts were assigned to permits with no monitoring requirements.
- Permits with no monitoring requirements were classified as either medium or high priority level permits.

The issues we found are detailed in the following sections. Several issues are related and are also attributed to the technical issues with the permitting portal's water use compliance module discussed in the previous section.

Analysis of Permit Monitoring Requirements and Compliance Analyst Assignments

Our analysis disclosed that 761 of the 3,277 (23%) individual permits were not assigned to compliance analysts for monitoring, which would typically indicate that the permits do not have active monitoring requirements. According to Water Use Compliance staff, only permits assigned to compliance analysts are monitored for compliance. We found that 605 of the 761 permits did not have any monitoring requirements; however, 156 of the 761 permits had active monitoring requirements, which indicates that monitoring would be required, and a compliance analyst should be assigned. Detailed results are shown in the following table.

Analysis of 761 Individual Water Use Permits not Assigned to Compliance Analysts for Monitoring As of May 19, 2025				
Permit Classification	Number of Permits and Status		Total / Percentage	
	Compliant	Non-Compliant		
Compliance Analysts Not Assigned to 761 Permits				
Compliance Analyst Not Assigned to Permit	706	55	761	
Analysis of 761 Permits with no Assigned Compliance Analysts				
No Compliance Analyst and No Permit Monitoring Requirements	597	8	605	80%
No Compliance Analyst Assigned to Monitor Permits with Monitoring Requirements	109	47	156	20%
Total	706	55	761	100%

Not assigning a compliance analyst to permits with active monitoring requirements results in the permits not being monitored for compliance. As a result, the correct compliance status may not be reflected in the water use compliance module.

In addition, we found that 667 of the 761 permits with no assigned compliance analysts were classified as medium or high priority levels. Specifically, we found the following:

544 of the 605 Permits with no Monitoring Requirements and no Compliance Analysts were Classified as either Medium or High Priority: Our analysis disclosed that 544 of the 605 (90%) permits that were not assigned compliance analysts for monitoring, and did not have any monitoring requirements, were classified as either medium or high priorities. The medium and high priority assignments conflict with the zero active permit requirements. Specifically, individual permits with no active requirements should be classified as having no priority level, not as medium or high priorities level permits.

The results of our analysis of the 605 permits are shown in the following table.

Analysis of Priority Levels Assigned to 605 Individual Water Use Permits with No Compliance Analyst and No Active Requirements As of May 19, 2025				
Permit Priority Level	Number of Permits with No Compliance Requirements		Total	Number with Priority Levels
	Compliant Permits	Non-Compliant Permits		
No Priority Level	61		61	61 (10%)
Medium	459	8	467	544
High	77		77	(90%)
Total	597	8	605	605

It should be noted that our review of the eight permits classified as non-compliant but not assigned to compliance analysts for monitoring disclosed that the last actions for some permits were 2015, 2018, and 2022. Further, some of these permits have expired and others are still active. The Water Use Compliance Unit should review these permits and ensure that the data reflected in the permitting portal is accurate.

123 of the 156 Permits with Monitoring Requirements were Classified as either Medium or High Priority but Not Assigned Compliance Analysts:

We found that the priority levels for 123 of the 156 (79%) of the permits with monitoring requirements (ranging from 1 to 19 requirements per permit), and classified as either medium or high priority permits, were not assigned compliance analysts. Further, 27 permits without priority levels were assigned to compliance analysts. The Water Use Compliance Unit should review the 156 permits with compliance requirements and determine whether compliance analysts should be assigned, and priority levels should be revised.

The results of our analysis of the 156 permits are shown in the following table.

Analysis of Priority Levels Assigned to 156 Individual Water Use Permits with Active Requirements but no Assigned Compliance Analyst As of May 19, 2025				
Permit Priority Level	Number of Permits with Compliance Requirements (<i>Requirements Ranged from 1 to 19 per Permit</i>)		Total	Priority Levels Totals
	Compliant Permits	Non-Compliant Permits		
No Priority Level	27		27	33
Low	6		6	(21%)
Medium	50	40	90	123
High	26	7	33	(79%)
Total	109	47	156	156

Overall, 667 of the 761 (88%) permits assigned medium and high priority levels need to be reviewed to either revise the priority levels or be assigned compliance analysts. Water Use Bureau staff explained that during November 2024 there was some data migration “clean-up” required before some permits could be migrated from the old to the new water use compliance module. Specifically, many permits did not have an assigned priority level which were required for migration. As a result, staff assigned priority levels based on the permit type and land use. Many of the permits were agricultural permits, which are usually either medium or high priority permits; however, during the assignment process staff did not realize that the permits did not have any active requirements and low priority status should have been assigned. Staff will add this issue to the list of outstanding issues to be resolved by Information Technology staff. In the meantime,

compliance analysts are manually correcting the priority levels while performing reviews. The Water Use Compliance Unit should re-evaluate the priority of these permits and update the water use compliance module, as necessary, to ensure permit data is accurately reflected in the permitting portal.

***Compliance Analysts Assigned to Permits
with no Monitoring Requirements***

Our analysis disclosed that 637 of the 3,277 permits did not have any monitoring requirements and 605 of these permits were not assigned to compliance analysts since there are no requirements to monitor (previously discussed); however, we found that 32 permits with no permit monitoring requirements were assigned to compliance analysts. The results are shown in the following table.

Analysis of 32 Individual Water Use Permits with no Monitoring Requirements and Compliance Analyst Assignment, May 19, 2025			
Permit Classification	Number of Permits and Status		Total
	Compliant	Non-Compliant	
No Monitoring Requirements but Compliance Analyst Assigned to Permit	30	2	32
Total	30	2	32

Our review of some of the 32 permits with no monitoring requirements but assigned to compliance analysts disclosed various issues, for example,

- Incorrect issue and expiration dates,
- expired permits,
- assigned to a compliance analyst who has separated from the District, and
- pre-expiration actions.

Analysis of Compliant Permits Disclosed Some Issues

Our review of a judgmental sample of 47 permits from the population of the 2,558 compliant individual permits disclosed several issues. We performed tests to determine whether the complaint status was correct and whether permit data were accurate and complete. Our review of data maintained in the permitting portal for some of the permits confirmed the new permitting system's issues (discussed in a prior section of our report). Specifically, our review and explanations from Water Use Compliance Unit staff disclosed the following:

- The compliant status was correct for 25 of the 47 (53%) sampled permits; however, inspections for several of these permits were either behind schedule or there were large gaps during inspections. Some examples include: most recent inspection for a permit was in March 2024 and some permits were not reviewed for over a year. Water Use Compliance staff stated that due to the large number of permits assigned to compliance analysts, the analysts cannot inspect all assigned permits in a timely manner.
- The compliant status for the remaining 22 (47%) permits were questionable. As a result, additional action is required by the Water Use Compliance Unit. Examples of the issues we found are as follows:
 - Permit requirements for a permit were not loaded in the new water use compliance module. In addition, an individual permit incorrectly migrated as a noticed general permit.
 - The most recent inspection of a permit resulted in a non-compliant status, based on data maintained in the legacy permitting database; however, the permit is reflected as compliant in the new water use compliance module. In addition, non-compliant permits in the module were reflected as compliant on the listing of complaint permits provided to us by the Water Use Compliance Unit.
 - The last inspection for a permit that expired on 3/30/2022 was performed on 2/10/2022. The inspection resulted in a compliant status, however, no action has been taken since the expiration to close out the permit. A permit expiration review is pending and assigned to a compliance analyst who is no

longer with the District, thus, the inspection must be reassigned. According to Water Use Compliance Unit staff, upon completion of the closeout, the permit will be reclassified to “resolved-expired.” There was also another permit that must be classified as resolved-expired.

- A permit has only a single one-time requirement that permit holders have already complied with; however, each year the permits are on the compliance analysts’ list of permits for inspection, although there are no pending requirements. It should be noted that we also found this issue during other audit tests. Water Use Compliance Unit staff stated once a compliance reviewer is assigned to a permit the reviewer cannot be reassigned, but they will have to determine how to isolate these permits so that inspections are not scheduled. Assigning and performing these inspections is an inefficient use of the Water Use Compliance Unit’s limited resources.
- Data in the water use compliance module did not substantiate the compliance status of some permits. Water Use Compliance Unit staff stated that in some instances all permit data did not migrate from the legacy permitting database to the new water use compliance module. In addition, all permits required a compliance status for successful migration to the new compliance module. In instances where permits did not have a compliance status, staff classified these permits as compliant (the default status) to successfully migrate the permit to the new compliance module.

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- Permit inspection frequencies are scheduled and assigned to compliance analysts based on data submission requirements (for example, quarterly or yearly). Inspection assignments cannot be created in instances where the frequency field in the water use compliance module is blank. We found instances where the inspection frequency fields were blank for some permits. As a result, inspections could not be assigned to compliance analysts. The Water Use Compliance Unit should develop a process to identify permits with compliance requirements that are not being scheduled for inspections because of blank inspection frequency fields.

The Water Use Compliance Unit staff were aware of several of the issues identified by our sample results and will either resolve or coordinate with the Information Technology Division's Application Section staff to address the issues.

Analysis of Compliance Status and Inspections

Based on our analysis of individual water use permit compliance status and inspection actions, from the September 2024 launch of the permitting portal's new water use compliance module to May 8, 2025, there were 3,177 individual water use permits consisting of 2,474 compliant and 703 non-compliant permits. We determined that 608 compliant permits and 9 of the non-compliant permits did not have any monitoring requirements. We excluded these permits from this analysis because permits with no monitoring requirements have already been addressed in our report. As a result, our analysis included a total of 2,560 permits (1,866 compliant and 694 non-compliant permits). Our analysis disclosed that the Water Use Compliance Unit staff inspected 1,588 (62%) of the 2,560 permits, however, 972 (38%) were not inspected.

The results of our analysis are shown in the table below.

Analysis of Individual Water Use Permit Compliance Status During September 2024 to May 8, 2025				
Inspections /Actions by Compliance Analysts (e.g., Communications or Submittal Reviews)	Number of Permits		Total / Percentage	
	Compliant	Not Compliant		
No Inspection or any other Compliance Actions	574	89	663	26%
No Inspections but Other Compliance Actions	205	104	309	12%
Total – No Inspections	779	193	972	38%
One Inspection but no Other Actions	82	21	103	4%
One Inspection and Other Actions	287	268	555	22%
More than One Inspection and Other Actions	718	212	930	36%
Total – Inspections	1,087	501	1,588	62%
Total	1,866	694	2,560	100%

We analyzed the inspection frequency for the 972 permits that were not inspected to determine whether inspections were required. Our analysis disclosed that 404 permits should have been inspected because inspections were required to be performed semi-annually, quarterly, or monthly, and were within our September 2024 to May 2025 review timeframe. We also found that the inspection frequency field for 447 permits was blank; thus, inspections could not be assigned. In addition, 121 permits may not have required inspections during our review timeframe because the required inspection frequencies were yearly or every two, five, and ten years; thus, likely not within our review timeframe.

The results of our analysis are presented in the following table.

Analysis of 972 Individual Water Use Permit Not Inspected During September 2024 to May 8, 2025				
Permit Status	Inspection Frequencies and Number of Permits			Total
	No Inspection Frequency (Blank Data Field)	One Time, Every 10, 5, 6, and /or 2 Years, and Yearly	Semi-Annually, Quarterly, and Monthly	
Compliant	428	107	244	779
Non- Compliant	19	14	160	193
Total	447	121	404	972
Percentage	46%	12%	42%	100%

In addition, 380 of the 404 (94%) permits that should have been inspected were classified as medium or high priority. Specifically,

- 225 of the 244 compliant permits were classified as medium or high priority.
- 155 of the 160 non-compliant permits were classified as medium or high priority.

Further, our analysis disclosed that 129 of the 428 permits with no inspection frequencies were classified as medium and high priority. The Water Use Compliance Unit should review these permits to ensure that all permits requiring inspections are scheduled for inspections.

In addition, we analyzed the 89 non-complaint permits for which no compliance monitoring actions were performed since the permits were migrated to the permitting portal's new water use compliance module in September 2024. Our analysis disclosed various reasons for the lack of action. Specifically, we concluded the following:

- **23 of the 89 Permits were Assigned to a Compliance Analyst who Separated from the District in October 2024:** Most of these permits required quarterly compliance monitoring; however, the most recent inspections for some permits were for the 1st and 2nd quarters of FY 2024; thus, no action was taken for the 3rd and 4th quarters of FY 2024 and the 1st quarter of FY 2025. According to Water Use Compliance Unit staff, monitoring actions cannot be performed until these permits are reassigned to another compliance analyst. Further, 2 of the 23 permits were classified as pending expiration. Permit reassignments must be done in a timely manner to ensure permit compliance is adequately monitored. It should be noted that the issue of separated analysts and their permit assignments has been identified and discussed in a prior section of the report.
- **10 of 89 the Permits were not Assigned to a Compliance Analyst:** Ten permits have requirements ranging from 2 to 17 requirements per permit. Compliance analysts should be assigned to the ten permits to perform necessary inspections. It should be noted that the issue of compliance analysts not assigned to permits has been identified and discussed in a prior section of the report.
- **56 of the 89 Permits Assigned to a Compliance Analyst were not Monitored:** Permit data maintained in the water use compliance module was reviewed for 10 of the 56 permits and we concluded that inspections were pending, and in some instances the most recent inspections were performed for 1st quarter of FY 2023 to 2nd quarter of FY 2024. This indicates that permits were not reviewed for compliance since the September 2024 launch of the new water use compliance module. According to Water Use Compliance Unit staff, the assigned compliance analysts were probably working on higher priority tasks.

Further, we planned to determine common reasons for the 972 non-compliant permits; however, the new water use compliance module is not programmed to generate certain comprehensive analytical reports; for example, missing reports and water use data for each non-compliant permit in a single report. As a result, we selected a sample of 18 non-compliant permits and concluded that compliance analysts classified permits as non-compliant for various reasons. The following are examples of reasons for the non-compliant status:

- Missing and past due water use data. In some instances, pumping data was missing for various periods; for example, one permit was missing data for several months in 2022, 2023, and 2024. In another instance, a permit was missing pumping data for January 2022 to August 2024. The last inspection was in August 2024.
- Overdue feasibility, seasonal crops, water loss report, 10-year compliance, and calibration report.
- Pumping allocations were exceeded.

According to Water Use Compliance Unit staff, there is insufficient staff to adequately monitor permit compliance. As a result, Compliance Unit staff cannot monitor all permits and prioritize medium and high priority permits. Further, technical issues with the new water use compliance module require staff to spend more time assisting permit holders and ensuring that data migrated to the new module is accurate. In addition, compliance analysts' responsibilities include the following:

- Responding to complaints/inquiries; for example, dry wells, low lake levels, irrigation on wrong day/time, water use/dewatering without a permit, and flowing wells.
- Responding to records requests, customer emails, and pre-application meetings.
- Reviewing draft permits to ensure that permit conditions and reporting requirements are correct.
- Providing support to the water use reviewers.

According to Water Use Compliance staff, data analysis by the Compliance Unit has been historically inadequate due to insufficient staffing. It should be noted that

inadequate staffing was an issue addressed in our prior report. As of October 2025, ten compliance analysts are responsible for monitoring 2,540 permits. Each compliance analyst is responsible for monitoring anywhere from 159 to 308 permits. In addition, two compliance analysts assigned 520 permits are no longer with the unit, thus, the permits may have to be re-assigned to the ten existing analysts. The unit currently has two staff vacancies. One position is in the process of being filled and the other position in the approval process and the vacancy should be posted soon.

Analysis of Noticed General Water Use Permits

According to Water Use Compliance Unit staff, most noticed general permits generally do not require monitoring because there are no monitoring requirements; however, monitoring is required for a small number of permits. As of May 19, 2025, out of 19,877 noticed general permits only 205 (~1%) contained monitoring requirements; thus, monitoring required by compliance analysts is minimal. Our analysis is shown in the following table.

Analysis of Noticed General Permit As of May 19, 2025			
Population / Permit Priority Level	Permits with Zero Monitoring Requirements	Permits with Monitoring Requirements – <i>Ranging from 1 to 72 per Permit</i>	Total
Compliant Permits			
None Designated	19,567	149	19,716
Low	33	9	42
Medium	36	24	60
High	8	1	9
Total	19,644	183	19,827
Non-Compliant Permits			
None Designated	4	0	4
Low	0	2	2
Medium	20	20	40
High	4	0	4
Total	28	22	50
TOTAL	19,672	205	19,877

Our analysis of noticed general permits disclosed the following:

- 101 permits with no monitoring requirements were assigned priority levels. Since Water Use Compliance Unit staff are aware of instances where individual permits were migrated to the new permitting portal as noticed general permits, staff should review these permits to determine whether the permit classification and data is accurate.
- 37 permits with no monitoring requirements were assigned to compliance analysts. Water Use Compliance Unit staff should also review these permits to determine whether the permit classification is accurate.

Further, as part of our audit procedures, we determined why the 28 noticed general permits with no compliance requirements were classified as non-compliant since permits, with no monitoring requirements, should not necessarily be classified as non-compliant. Based on our review of the permit data and discussion with Water Bureau Compliance Unit staff, we concluded the following:

- **Four Permits with no Priority Designation and no Monitoring Requirements:**
The Water Use Compliance Unit corrected the status of three of the four permits from non-compliant to compliant. The remaining permit was an individual permit incorrectly classified as a general noticed permit. Further, according to Water Use Compliance Unit staff, there are many individual permits with requirements that are incorrectly classified in the new water use compliance module as noticed general permits with no monitoring requirements; thus, the number of individual permits may be understated, and the number of noticed general permits may be overstated.
- **Twenty-four Permits with no Monitoring Requirements were Classified as Medium and High Priority:** We concluded that 21 of 24 permits were individual permits that incorrectly migrated to the new system as noticed general permits and three permits should have been cancelled. In addition, the monitoring requirements for some permits were not loaded in the new water use compliance module.

Non-Compliance Letters and Enforcement Referrals

Since the September 2024 launch of the new water use compliance module, the Water Use Compliance Unit decided not to issue any non-compliance letters to permit holders because of technical problems with the module. The portal issues were detailed in a previous section of our report. Examples of the issues include the following: permit holders unable to submit monitoring data, inaccurate pumpage calculations, system migrations issues (incorrect permit classifications, missing permit requirements, and incorrect expiration dates). Water Use Bureau staff decided that non-compliance letters should not be sent to permit holders since the permit issues could be system related.

Non-compliant permits are referred to the Natural Resource Compliance Section only after the Water Use Compliance Unit has sent out the required non-compliance notices. Since non-compliance notices have not been issued, permits are not being referred for enforcement actions. It is important that all water use compliance module issues be addressed in a timely manner so that non-compliant permit holders can be identified and notified of compliance issues, and compliance unit staff can work with them to bring their permit into compliance. This would ensure that water use is reasonable and is consistent with the public interest.

RECOMMENDATIONS

1. **Resolve the permitting portal's water use compliance module submittal issues to ensure that permit holders can successfully submit required permit data electronically.**

Management Response: The initial reported issue with the Compliance Submittal module was resolved in early 2025. Upon resolution of that issue, a new issue was identified which related to the Requirements data on permits that had been issued in the new system. The Requirements load caused a new problem due to how the new system works with legacy requirements. When requirements are loaded the system does not recognize the legacy requirements because of data clean-up that had occurred to make requirement names more consistent across permits. This caused new requirements to be created which affected the reporting dates on the compliance submittals which in turn caused an issue for the external customers. IT started looking into the issues for this in September 2025 and began working on it. Water Use Compliance staff have been testing and providing feedback to IT. Once resolved, previously submitted data will need to be cleaned up. Water Use Compliance will coordinate with IT to clean up data.

Responsible Division: Water Use Compliance and IT

Estimated Completion: June 30, 2026

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2. **Notify permit holders to submit all overdue data once the permitting portal's water use compliance module submittal issues are resolved.**

Management Response: Water Use Compliance Analysts will work from the list of permits in the Overdue Compliance Data tab on the dashboard, will notify permittees that submittal issues have been resolved, and will request overdue data.

Responsible Division: Water Use Compliance

Estimated Completion: September 30, 2026

3. **Ensure that Water Use Compliance Unit staff input all submittals that were received but not entered in the permitting portal's water use compliance module.**

Management Response: Water Use Compliance staff will enter data for all submittals in the backlog once the issues related to submittals are resolved. Water Use Compliance staff check the backlog periodically to see if any backlog data can be entered and enter the data if possible.

Responsible Division: Water Use Compliance

Estimated Completion: September 30, 2026

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4. **Resolve all pumping calculation issues and require compliance analysts to ensure that pumpage calculations are correct for those permits with pumpage calculation issues.**

Management Response: This is dependent on recommendation #1 as the submission data should be corrected before the pumpage totals are reviewed and may be dependent on recommendation #5 to have all the historical total information migrated. Upon completion of recommendation #1 and recommendation #5, Water Use Compliance staff will review pumpage totals and will coordinate with IT to resolve any issues.

Responsible Division: Water Use Compliance and IT

Estimated Completion: August 31, 2026

5. **Ensure that all water use permit data is successfully migrated from the old permitting portal to the new permitting portal's water use compliance module.**

Management Response: This was worked on shortly after the release of the compliance module in September 2024, and several times since to ensure the permit data is migrated. Some of the information that was previously missing in the new system has been migrated. Water Use Compliance has been working with IT to identify and migrate the information that is still missing in the new system (calibration dates, additional data for some permits (not all): allocations in Requested Water Use Summary, totals in All Requirement Totals tab, specification values for requirements, etc.).

Responsible Division: Water Use Compliance and IT

Estimated Completion: July 31, 2026

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6. **Implement a process to identify individual water use permits that incorrectly migrated to the permitting portal's water use compliance module as noticed general permits. Revise permit classification as necessary.**

Management Response: For permits that needed to be updated, Water Use Compliance and IT identified rules to update permits in bulk from Noticed General Permit to Individual and to migrate the Individual permit information. This was done shortly after initial release. Rules could not be identified for all permits that needed to be updated. There is a manual process in place for Water Use Compliance staff to work with the Regulatory Support Section to have the updates made when they are found.

Responsible Division: Water Use Compliance

Estimated Completion: Water Use Compliance will continue to report issues and have them corrected as they are found.

7. **Work on implementing the automated notification reminder for compliance analysts to inform permit holders that a 10-year compliance report letter is required to be submitted to the Water Use Compliance Unit.**

Management Response: The need for implementation of the automated process was documented initially at the time of the release, and a workaround was identified to be used until the automated process is completed. Water Use Compliance has been sending the 10-year compliance report notification letters using an old legacy report and comparing the requirement due dates to the new system. IT is working on creating a new report to be used for permits that need to have the 10-year compliance report submitted. Water Use Compliance staff can continue to use the Ad Hoc letter process to generate the letters as needed. There is on average five to ten per month to be sent. If this process becomes too cumbersome then IT, Water Use Compliance, and Regulatory Support will revisit the discussion to automate the process.

Responsible Division: Water Use Compliance and IT

Estimated Completion: April 30, 2026

- 8. Correct all inaccurate permits expiration dates reflected in the permitting portal's water use compliance module.**

Management Response: The issue with the permit expiration date calculation when a permit is issued has been addressed and a fix for it went to production on March 5, 2026. IT has identified a way to identify legacy permits that need the permit expiration date corrected. Water Use Compliance has been manually checking the expiration date on permits issued in the new system and having the expiration date updated as needed. IT and Water Use Compliance will coordinate to complete the cleanup for remaining permits. There is a process in place for Water Use Compliance to work with Regulatory Support to have the dates corrected as they are found.

Responsible Division: Water Use Compliance and IT

Estimated Completion: May 31, 2026

9. Correct the excel download issues in the permitting portal's water use compliance module to ensure accurate data output and analysis.

Management Response: An IT ticket was created for this in October 2025, and the ticket was prioritized/assigned to a developer in December 2025. Water Use Compliance supervisors tested, and the fix went to production on March 19, 2026.

Responsible Division: IT and Water Use Compliance

Estimated Completion: Completed

10. Analyze the permit population to determine permits classified as resolved-expired and take necessary steps to ensure that compliance analysts are not assigned to these permits.

Management Response: The compliance analyst is not removed from the permit object when the permit status is changed to resolved-expired. Water Use Compliance staff will filter out permits with resolved-expired status in reports. Water Use Compliance staff will verify that permits with resolved-expired status are not shown in the compliance analyst's My Permits list and dashboards and will coordinate with IT if any changes need to be made.

Responsible Division: Water Use Compliance

Estimated Completion: March 31, 2026

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- 11. Consult with the Information Technology Division to implement steps to ensure that permits pending reassignments can be reassigned in bulk instead of individually. In addition, request authorization to independently perform bulk permit reassignments.**

Management Response: Water Use Compliance and IT discussed this in November 2025, and in February 2026, IT confirmed the ‘out of box’ standard bulk transfer feature to transfer ownership of permit cases/assignments is working correctly. Custom code to update the compliance reviewer on the permit object will need to be implemented for reports to use this information. IT needs to investigate the effort needed to make these custom code changes to accommodate this need and implement it.

Responsible Division: Water Use Compliance and IT

Estimated Completion: July 31, 2026

- 12. Work with the Information Technology Division to address permit data discrepancies between the permitting portal’s water use application and compliance modules.**

Management Response: *A)* Many Water use applications that were Withdrawn, Returned, or Denied have the application status of Resolved-Completed. This is seen on the application and in the Application History tab on the permit object. The application status needs to be corrected. This was not realized with the initial NGP release as the new system wasn't fully utilized until the final Water Use module release. An IT ticket was created in December 2025 for this. IT will prioritize and get this assigned in March 2026. *B)* Facilities on the permit object do not always match the application due to the way the system was set up for facilities that were removed from an application or marked do not display. Water Use Compliance staff previously identified some permits and discussed with IT in late 2025. Water Use Compliance staff will review the process in place for removed facilities and facilities

marked do not display. Water Use Compliance staff will test and identify if any changes need to be made and will coordinate with IT if needed.

Responsible Division: Water Use Compliance and IT

Estimated Completion: *A)* May 31, 2026 (IT), *B)* September 30, 2026 (Water Use Compliance)

- 13. Determine whether the non-compliant status of the 67 short-term dewatering permits is correct. If not, take adequate steps to resolve non-compliance issues and update the compliance status reflected on the permitting portal's water use compliance module.**

Management Response: Water Use Compliance previously identified short-term dewatering permits with Not Compliant compliance status (re-verified the permits on March 10, 2026) and is resolving non-compliance issues or updating the system as needed (updating permit status, compliance status, inspection frequency, expiration date, etc.).

Responsible Division: Water Use Compliance

Estimated Completion: May 31, 2026

14. Ensure that compliance analysts are assigned to individual water use permits with active monitoring requirements.

Management Response: Water Use Compliance previously identified active Individual permits with active requirements and is verifying/updating the system as needed to ensure that a compliance analyst is assigned to each permit (re-verified permits on March 10, 2026). Water Use Compliance will also review the Compliance Dashboard to identify any changes that can be made to make it easier to identify newly issued permits that need a compliance analyst assigned (Ex. see how permits can be filtered out, add permit type to Compliance Review workbasket, etc.).

Responsible Division: Water Use Compliance

Estimated Completion: May 31, 2026

15. Review the 544 individual water use permits with no monitoring requirements but classified as medium or high priority level permits to determine the correct priority level. Revise priority levels as necessary.

Management Response: Water Use Compliance previously identified individual permits with no active requirements, but have high, medium, or low priority and will review/adjust the priority as needed (re-verified permits on March 10, 2026). Water Use Compliance will determine if using N/A for the priority will resolve issues. Water Use Compliance will coordinate with IT to see if a bulk update of the priority can be done.

Responsible Division: Water Use Compliance

Estimated Completion: June 30, 2026

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- 16. Review the 156 individual permits with monitoring requirements but no assigned compliance analysts to determine whether compliance analysts should be assigned to monitor the permits.**

Management Response: Related to recommendation #14. Water Use Compliance previously identified active Individual permits with active requirements and is verifying/updating the system as needed to ensure that a compliance analyst is assigned to each permit (re-verified permits on March 10, 2026). Water Use Compliance will also review the Compliance Dashboard to identify any changes that can be made to make it easier to identify newly issued permits that need a compliance analyst assigned (Ex. see how permits can be filtered out, add permit type to Compliance Review workbasket, etc.).

Responsible Division: Water Use Compliance

Estimated Completion: April 30, 2026

- 17. Review the 32 individual water use permits with no monitoring requirements that were assigned to compliance analysts to determine whether the permit status should be updated and whether compliance analysts should be assigned.**

Management Response: Water Use Compliance previously identified permits with no requirements but are assigned to a compliance analyst and will update the compliance analyst as needed (re-verified permits on March 10, 2026). Water Use Compliance will also verify the expiration date and will follow up on submittal of a permit application as needed. Water Use Compliance and IT are working on correcting expiration dates (recommendation #8).

Responsible Division: Water Use Compliance

Estimated Completion: November 30, 2026

18. Ensure all permit requirements have been migrated from the legacy permitting portal to the new permitting portal's water use compliance module.

Management Response: Clean up and updates were completed shortly after the release of the compliance module based on business rules that were identified and where bulk updates could be made. Water Use Compliance has a process in place with regulatory Support staff to have permits migrated as needed.

Responsible Division: Water Use Compliance

Estimated Completion: Completed. Water Use Compliance will continue to report issues and have them corrected as they are found.

19. Implement a process to ensure that all expired permits are closed out and reclassified as resolved-expired.

Management Response: Clean up and updates were completed shortly after the release of the compliance module based on business rules that were identified and where bulk updates could be made. Water Use Compliance staff will continue to work on permits with a past expiration date to verify/correct the expiration, update the permit status, or follow up to ensure that an application is submitted as needed.

Responsible Division: Water Use Compliance

Estimated Completion: Completed. Water Use Compliance will continue to work through list of permits with expiration assignments (past expiration date) and follow up as needed.

20. Determine which individual water use permits have a single one-time submission requirement that permit holders already complied with and decide the best way to segregate these permits from permits with on-going active requirements that currently require monitoring.

Management Response: Water Use Compliance will identify permits and will implement a business process to update the priority for these permits to N/A and will work with IT further if reports and compliance dashboards need to be updated.

Responsible Division: Water Use Compliance

Estimated Completion: November 30, 2026

21. Ensure that the inspection frequency field in the permitting portal's water use compliance module specifies the inspection frequency for permits with active monitoring requirements.

Management Response: Water Use Compliance previously identified permits with active requirements and submission frequency and will verify that the inspection frequency is correct or will update the inspection frequency as needed (re-verified permits on March 10, 2026).

Responsible Division: Water Use Compliance

Estimated Completion: August 31, 2026

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- 22. Determine the reasons why the 380 individual water use permits classified as medium and high priority have not been inspected since September 2024. Prioritize inspections of these permits, if necessary**

Management Response: Many permits have not been inspected recently due to permits being assigned to a compliance analyst that is no longer working in the compliance section or at the District or due to complications with the permitting portal. Water Use Compliance will identify permits that do not have a recent inspection and will prioritize inspections to be completed for these permits. This is partially dependent on reassigning permits and assignments to a compliance analyst in bulk (recommendation item #11) and on filling vacant positions.

Responsible Division: Water Use Compliance

Estimated Completion: August 31, 2026, and dependent on bulk reassignment of permits / assignments

- 23. Implement a process to routinely identify individual water use permits classified as medium and high priorities that are not being inspected at required frequencies. Take appropriate actions to ensure inspections are being performed.**

Management Response: Water Use Compliance supervisors will remind compliance analysts to focus on completing inspections for medium and high priority permits first and will run a report routinely of completed inspections to identify permits that have not had an inspection completed at the specified frequency. This is also dependent on filling vacant positions, the bulk reassignment of permits/assignments, and completing the process of verifying/updating the priority and inspection frequency so that dashboards show only the permits that compliance analysts need to work on.

Responsible Division: Water Use Compliance

Estimated Completion: August 31, 2026, and dependent on bulk reassignment of permits / assignments

- 24. Review the noticed general permits classified as non-complaint to determine the reasons for the non-compliant classifications and update the permitting portal's water use compliance module, as necessary.**

Management Response: Water Use Compliance previously identified Noticed General Permits with Not Compliant status and will verify/update the compliance status (re-verified permits on March 10, 2026).

Responsible Division: Water Use Compliance

Estimated Completion: October 31, 2026

- 25. Determine whether the noticed general permits with monitoring requirements and/or medium priority levels are accurately classified. Update the permitting portal's water use compliance module, as necessary.**

Management Response: Water Use Compliance previously identified Noticed General Permits with requirements and priority and will verify/update the priority (re-verified permits on March 10, 2026).

Responsible Division: Water Use Compliance

Estimated Completion: October 31, 2026

26. Ensure all vacant positions Water use Compliance Unit are filled.

Management Response: As of March 5, 2026, the compliance supervisors are working with HR to make offers for Scientist 4, Scientist 3, and Scientist 2 compliance analyst positions. A Scientist 2 compliance analyst position was reposted on March 5, 2026. This position will be filled as quickly as possible.

Responsible Division: Water Use Compliance

Estimated Completion: April 30, 2026

27. The Water Use Bureau and Information Technology Division should coordinate to ensure that the technology issues presented in our report are resolved in a timely manner.

Management Response: Management Response: Water Use Compliance will coordinate with IT to ensure that all issues are resolved. Water Use Compliance has generated a report to identify and address compliance analyst, inspection frequency, priority, and compliance status issues and has started working through the permits to verify / update as needed.

Responsible Division: Water Use Compliance and IT

Estimated Completion: December 31, 2026