



Audit of the Monitoring of Water Use Permits

Report # 07-27

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Office of Inspector General

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SOUTH FLORIDA WATER MANAGEMENT DISTRICT

October 9, 2007

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Re: Audit of the Monitoring
of Water Use Permits
Report # 07-27

This audit was performed pursuant to the Inspector General's authority set forth in Chapter 20.055, F.S. The audit focused on determining the District's efforts to ensure compliance with the limiting conditions specified in water use permits. Field work was conducted from May 2007 through July 2007. This report was prepared by Jankie Bhagudas and Tim Beirnes.

Sincerely,

John W. Williams, Esq.
Inspector General

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BACKGROUND

At the request of Executive Management, we conducted an audit of the District's efforts to ensure compliance with the limiting conditions specified in water use permits.

The Water Supply Department (Water Supply) is situated within Water Resources Management. Its mission is to provide for reasonable and beneficial uses of water for agricultural and urban demands while protecting and restoring the environment and water resources of the region. This mission is partly accomplished through the Water Use Regulation Division, which is responsible for permitting and monitoring compliance of water use permits. Water use permits are issued pursuant to Section 373.223, Florida Statutes, which requires District staff to ensure that proposed uses are reasonable and beneficial; will not interfere with other water users in the area; are consistent with the public interest; and will not harm the environment.

A water use permit allows for the withdrawal of a specified amount of water either from the ground, a canal, a lake or a river. They are issued for irrigating golf courses, crops, nursery plants, and landscaping. Water use permits are also issued for dewatering, withdrawing water for industrial uses and withdrawing water for public water supply. Water use permits are not needed for single family homes or duplexes (provided all water is withdrawn from one well), fire fighting water wells, salt water use, and reclaimed water use.

There are two main categories of permits: individual and general. Individual permits are for uses of over 15 million gallons per month and require approval by the Governing Board. General permits are classified as either major or minor and are approved by staff. Major general permits are issued for uses between 3 million gallons per month and 15 million gallons per month and minor general permits are issued for uses of less than 3 million gallons per month. All permits are issued with limiting conditions which are specific compliance permit stipulations permittees must comply with to protect water resources; however, not all require monitoring by the Water Use Regulation Division. Further, permits are issued for fixed periods ranging from 1 year to 20 years depending on the proposed use and resource considerations at the time of permitting. Individual and major general permits contain limiting conditions that require

monitoring. Permittees' failure to comply with limiting conditions may result in substantial fines, and potentially the revocation of the water use permit and the loss of the right to use water.

As of May 9, 2007, there were about 17,272 active water use permits which have been allocated to use over 18 billion gallons of water per day. As shown in the table below, Water Use Compliance is required to monitor at least 2,920 of the 17,272 active water use permits. It should be noted that individual permits have been allocated over 12 billion gallons of water per day with the most allocations to agricultural, dewatering, and public water supply permits, respectively.

Types of Permits	Number of Permits	Daily Allocation (in million of gallons)	Monitoring Requirements
Minor General	13,204	1,240	Monitoring not required
Short Term Dewatering	1,148	4,065	There are several types of dewatering permits and the monitoring requirements vary. Staff could not readily determine how many required monitoring.
Major General	415	102	Monitoring required
Individual	2,505	12,800	
Total	17,272	18,207	

The table below illustrates the distribution of the individual and major general permits by type. Agricultural and landscape permits are a majority of the permits that require monitoring of limiting conditions.

Water Use Type	Number (%) of Permits that Require Monitoring			
	Individual		Major General	
Agricultural	1,316	<i>53%</i>	138	<i>33%</i>
Landscape	459	<i>18%</i>	196	<i>47%</i>
Golf Course	270	<i>11%</i>	43	<i>10%</i>
Dewatering	155	<i>6%</i>		
Public Water Supply	127	<i>5%</i>	15	<i>4%</i>
Industrial	84	<i>3%</i>	9	<i>2%</i>
Nursery	48	<i>2%</i>	11	<i>3%</i>
Other (e.g., aquaculture & livestock)	46	<i>2%</i>	3	<i>1%</i>
Total	2,505	100%	415	100%
Combined Total	2,920			

OBJECTIVE, SCOPE, AND METHODOLOGY

Our overall audit objective focused on determining whether the Water Use Regulation Division is adequately ensuring that permit holders are complying with the limiting conditions of their water use permits. Specifically, we determined whether compliance with the limiting conditions specified in water use permits are adequately monitored and enforced. We also compared the District's compliance process to those of the St. Johns River and the Southwest Florida Water Management Districts.

To accomplish our objective we obtained an understanding of the water use permit compliance process by interviewing key personnel in the Water Use Regulation Division's Compliance Unit and reviewing relevant policies and procedures, e.g., Section 373.223; Chapters 40E-2 and 40E-20, Florida Administrative Code (FAC); and the Basis of Review for Water Use Applications Within the South Florida Water Management (Basis of Review). We determined whether existing compliance monitoring procedures were being followed and determined reasons for non-compliance. We also determined whether there were adequate enforcement actions against non-compliant water use permits holders. In addition, we requested that the Compliance Unit staff contact the St. Johns River and Southwest Florida Water Management Districts to determine the compliance procedures and determine whether the District could use any of the procedures to improve its compliance monitoring process.

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, our audit revealed that there are controls in place to monitor permit compliance; however, the controls have not been fully implemented due to insufficient staff. In fact, at the beginning of our audit, Water Resources management acknowledged additional staff was needed to adequately monitor permit compliance. In June 2007, as part of the upcoming Fiscal Year 2008 budget process Water Resources Management plans to request six additional full time employees to improve compliance with permit limiting conditions. Our analyses disclosed that all of the required reports and monitoring data were submitted for only about 23 percent of permits with reporting requirements; consequently, about 77 percent were missing some or all of the required reports and monitoring data.

Compliance Unit staff explained that routine monitoring and enforcing of permit limiting conditions is often not possible due to other responsibilities. Instead, Compliance Unit staff monitor compliance for those permits that they believe can cause potential harm to the water resources, e.g., monitoring public water supply permits for salt-water intrusion. In addition, Compliance staff review the compliance status of permits they come across while performing other duties and take steps to resolve those with compliance issues.

The Water Use Compliance Database generates a summary report which ranks out of compliance permits by the severity of the non-compliance and provides the total number of “tickets” issued for missing data or submitted data that is out of specification (not in compliance). Our review disclosed that the summary report was intended to assist staff to identify non-compliant permits; however, the Compliance reviewers rarely use it to monitor and enforce compliance. A report generated on May 21, 2007, disclosed that a total of 272,784 tickets were issued against 1,959 permits.

Further, the Compliance Unit mails blank reporting forms for pumpage and monitoring data to permit holders annually to ensure: that permittees are aware of their reporting requirements, to simplify the reporting process, and to initiate a dialogue with permit holders. In some instances, the forms are returned undelivered, which are usually

indications of problems with the database information. Compliance reviewers are required to investigate the reasons for the undeliverable forms, take appropriate action, and update the database. However, the reviewers stated that due to other duties undeliverable forms are not resolved timely.

In addition, we noted that very few notices of non-compliance are sent to non-compliant permit holders, based on our review of a database report which tracks phone calls and notices of non-compliance. This review revealed that notices of non-compliance were generated for only 138 permits of the approximately 1,760 non-compliant permits in 2006 and for only 17 permits of the approximately 1,600 non-compliant permits in 2007 (as of June 12, 2007).

The inadequate monitoring of compliance with permit limiting conditions has also resulted in few referrals for enforcement action. During the period January 11, 2005 – May 2, 2007, the Compliance Unit forwarded 185 enforcement referrals to the Regulation Department's Environmental Resource Compliance Unit and only seven were for violations of active permits where the permittees were not complying with limiting conditions. Most of the remaining 177 referrals were for water use without a permit and failure to renew expired permits.

At our request, Water Use Compliance staff contacted the St. Johns River and Southwest Florida Water Management Districts to determine whether the District could use any of their compliance procedures to improve its compliance monitoring process. The Compliance Supervisor obtained some preliminary information. Based on the information obtained, it appears that there are similarities and differences among the Districts. It may be advantageous to meet with the other Districts to obtain further details and determine whether the District can improve its compliance monitoring.

Inadequate Compliance Monitoring

The Water Use Compliance Unit is primarily responsible for ensuring that permit holders of individual and general water use permits comply with the standard and special conditions of their permits and for analyzing the data submitted by permit holders. Standard conditions contain general information and operational constraints that apply to all uses of water such as allocations and water withdrawal facilities. Special conditions

address project specific requirements such as water quality or water level monitoring that may vary among permit use classes, sources of water supply and geographic locations.

During the permitting phase, permit requirements are ranked in order of importance according to compliance priority and impact severity, and then programmed into the Water Use Compliance Database. Compliance with permit requirements typically require permittees to submit quarterly reports to the Water Use Regulation Division showing water withdrawal quantities from each withdrawal facility, or point of diversion. Monitoring data (e.g., water level and chloride concentration levels) are also required to be submitted, however the frequency may vary. Permittees are on the honor system for reporting data because Compliance Unit staff rarely perform site inspections. It should be noted that recently the database has been updated to identify questionable data based on historical submissions. In addition, permittees are required to submit a recalibration report for the water use accounting system for each withdrawal facility every five year.

In instances where required data is not reflected in the database or the data entered is out of specification (i.e., exceeding permit allocations or limitations) the database generates a “ticket.” Tickets are problems identified by the database that require resolutions. Various reports of out-of-compliance permits can easily be generated from the database. In addition, the database can generate the following:

- notice of non-compliance letters,
- permit expiration notifications,
- water use without permit letters and tracking; and
- yearly data submission forms (sent annually to permit holders).

We concluded that although the Water Use Regulation Division has the analytical tools in place to easily identify non compliant permits, a large number of permits are out of compliance. Specifically, we analyzed compliance information provided by the Water Use Regulation Division covering the period January 1, 2005 to June 12, 2007, and noted the following:

- Data submission averaged 52 percent in 2006 and 39 percent for 2007 (as of June 12, 2007).
- None of the required reports and monitoring data were submitted for about 16 percent of permits.
- All of the required reports and monitoring data were submitted for only about 23 percent of permits; consequently, about 77 percent were missing some or all of the required reports and monitoring data.

The following table further illustrates the submission status of required reports and monitoring data.

Submission Status of Data and Monitoring Reports	Number (%) of Permits with Data Submission Requirements		
	2005	2006	2007 (As of June 12, 2007)
All required reports were submitted	885 (37%)	367 (17%)	301 (16%)
1% to 25% of the required reports were not submitted	329 (14%)	365 (17%)	283 (15%)
26% to 50% of the required reports were not submitted	427 (18%)	469 (22%)	496 (26%)
51% to 99% of the required reports were not submitted	496 (21%)	571 (27%)	479 (25%)
None of the required reports were submitted	278 (12%)	364 (17%)	370 (19%)
Total	2,415 (100%)	2,136 (100%)	1,929 (100%)

We also noted that none of the required data were submitted for some permits during the entire period of our analysis. For example, there were no submittals for 23 agricultural permits and 74 landscape permits during the period January 1, 2005 to June 12, 2007. According to the Compliance Supervisor, compliance could be improved via increased public visibility and face-to-face meetings with permittees.

It is important to ensure that pumpage and monitoring data are reported since it enables the District to better determine future water demands, implement water shortage

plans, and protect the District's water resources. Further, during the permit renewal and permit modification processes, permit reviewers are better able to determine whether previous usage allocations were adequate. This data is also helpful to Compliance Unit reviewers in identifying and monitoring problem areas, e.g., areas of high chloride concentration and dry well mitigation claims.

Water Use Regulation Division staff provided explanations for the low compliance rates, which are discussed in detail below.

Insufficient Staff to Monitor Permit Compliance

At the beginning of our audit, senior department staff acknowledged additional staff was needed to adequately monitor permit compliance. In June 2007, as part of the upcoming Fiscal Year 2008 budget process Water Resources Management plan to request additional full time employees (three compliance reviewers, one data entry technician, one data steward, and one supervisor) to improve compliance with permit limiting conditions.

Currently, eight District staff members consisting of the supervisor, six compliance reviewers, and one data entry technician are assigned to the Compliance Unit. In addition, a District staff assigned to the Lower West Coast Service Center and four contracted workers provide assistance in various areas (two perform field compliance activities, one identifies unpermitted activities, and the remaining performs data entry).

The six compliance staff are assigned specific areas within the District and are responsible for monitoring 3,279 permits. Each compliance staff is responsible for monitoring anywhere from 186 permits to 795 permits. It is important to note that the number of major general and individual permits is expected to increase as the development continues and permits are renewed with additional limiting conditions.

Routine monitoring and enforcing of permit limiting conditions is often not possible due to other responsibilities. Instead, Compliance Unit staff monitor compliance for those permits that they believe can cause potential harm to the water resources, e.g., monitoring public water supply permits for salt-water intrusion. In addition, Compliance staff review the compliance status of permits they come across while performing other duties and take steps to resolve those with compliance issues.

In addition to monitoring compliance, staff are also responsible for the following:

- monitoring consent agreements;
- investigating unpermitted users by reviewing maps and aerials photos;
- investigating dry well complaints;
- assisting in the Water Use Database enhancements and training;
- responding to inquiries/requests, (e.g., providing copies of permits and forms, public record requests, and internal data requests by District staff);
- conducting site inspections; and
- assisting permittees with calibration issues.

These responsibilities usually take precedence over actual compliance work. In the course of reviewers performing the duties described above, if they come across non-compliant permits they take the necessary steps to bring the permit into compliance, such as calling a permittee for missing data. Data analysis by the Compliance Unit has been historically inadequate due to insufficient staffing. Analyses of pumpage data, water level measurements, chloride concentration measurements, and wetland health indicators assist in measuring the effect of the permitted use on the resource itself, as well as toward other considerations, such as existing legal users, wetlands, and domestic uses. Further, it proactively identifies and addresses important problems prior to the point of irreversible harm to the District's resources.

Further, some of the duties assigned to the reviewers are administrative in nature, such as correcting submitted data. This results in less time the reviewers can dedicate to actual compliance monitoring and data analysis.

Our review disclosed that several procedures have been designed to enhance compliance with permit limiting conditions; however, these procedures have not been fully implemented due to insufficient staff. The procedures are detailed below.

Database Information not Adequately Utilized to Monitor and Enforce Out-of-Compliance Permits

The Water Use Compliance Database generates a summary report which ranks out-of-compliance permits according to compliance priority and impact severity for compliance tracking purposes. Specifically, a "ticket" is issued for each piece of missing

data or submitted data that is out of “spec” (i.e., submitted data exceeded allocation or another limitation). Scores ranging from 4 to 13 (least to most severe) are assigned to each ticket and the summary reports list the permits by severity of the out-of-compliant conditions (i.e., a permit with a ticket assigned a score of 13 is the highest priority and should be investigated first). It should be noted that a permit may have several reporting requirements and tickets are issued for each non-compliance occurrence. A ticket will remain open until the condition is satisfied, which is usually upon the receipt of missing data. In some instances, reviewers may have to close tickets manually, for example, tickets issued for missing pumpage data that was never maintained by permittees. The summary report is the efficient tool to identify out-of-compliant permits; however, it is rarely used. According to the reviewers, routine monitoring and enforcing permit compliance is not possible.

Our analysis of the summary database report, as of May 21, 2007, disclosed that a total of 272,784 tickets were issued against 1,959 permits. Further, 472 (25%) of the permits were issued tickets with out-of-compliance item scores of 11 to 13. The following table provides further details.

Most Severe to Least Severe	Non-Compliance Severity Levels	Number (%) of Permits		Total Number of Tickets Issued **
	13	10	1%	413
	12	313	16%	59,910
	11	149	8%	58,779
	10	225	11%	36,582
	9	304	16%	39,511
	8	579	30%	46,105
	7 - 5	379	19%	31,484
Totals	1,959	100%	272,784	

** - Reflects all tickets issued as permits may have tickets for other severity levels as well.

Some of the tickets may have been issued for data not tracked by permittees and some minor general permits were incorrectly assigned submittal requirements. Such tickets

have to be reviewed and closed out manually; however, other responsibilities prevent staff from analyzing and closing out these tickets.

It should be noted that the electronic reporting module of the e-Permitting system is expected to be operational by early September 2007 and by November 2007 some of the public water supply permit holders will be able to submit permit compliance information online. Further, all permit holders will have the ability to submit data electronically by April 2008.

Incorrect and Outdated Database Information

Blank reporting forms for pumpage and monitoring data are mailed to permit holders annually on the month after their permits were issued to ensure that permittees are aware of their reporting requirements, to simplify the reporting process, and to initiate a dialogue with permit holders. In some instances the forms are returned undelivered, which usually indicate problems with the database information. Forms are usually returned for various reasons, for example, the property may have been sold and the permittee failed to notify the District of the transfer to the new owners (as required by permit limiting conditions) or the land use may have changed. Compliance reviewers are required to investigate the reasons for the undeliverable forms, take appropriate action, and update the database. However, due to the reviewers other duties undeliverable forms are not resolved timely. If the reporting forms were returned because the permitted activity ceased, tickets will continue to be issued against the permit until the database is updated.

Small Number of Non-Compliant Permit Holders Sent Notices of Non-Compliance

There are also procedures for issuing compliance letter when permit holders do not comply with their submission requirements; however, the Compliance Unit does not fully comply with these procedures. In instances of non-compliance, Compliance reviewers may first call permittees, which according to the Compliance Supervisor has been quite successful in the submission of missing data. However, if the data is not received in a timely manner, the reviewers are required to send three notices of non-

compliance (generated by the database) before any enforcement action can be taken. The timeline of the notices are as follows:

- *1st Notice of Non-Compliance*: Letter to permittee with a 30 day deadline for receipt of missing data.
- *2nd Notice of Non-Compliance*: Certified letter to permittee with 15 day deadline for receipt of missing data.
- *Final Notice of Non-Compliance*: Certified letter to permittee with 15 day deadline for receipt of missing data.

If the requested data is not received after the deadline indicated in the final notice, the permit is referred to the Regulation Department's Enforcement Resource Compliance Unit for enforcement. Enforcement actions can include monetary fines and reimbursement for investigative costs. Further, out-of-compliance permit holders can incur civil penalties of up to \$10,000 per day after warnings have been issued.

Based on a database generated report, which tracks phone calls and notices of non-compliance, notices of non-compliance were generated for only 138 permits of the approximately 1,760 non-compliant permits in 2006, and for only 17 permits of the approximately 1,600 non-compliant permits in 2007 (as of June 12, 2007). Thus, only a relatively small number of non-compliant permit holders are being notified.

Few Non-Compliant Permits Referred for Enforcement Action

During the period January 11, 2005 – May 2, 2007, the Compliance Unit forwarded 185 enforcement referrals to the Regulations Department's Environmental Resource Compliance Unit and only seven were for violations of active permits where the permittees were not complying with limiting conditions. Most of the remaining 177 referrals were for water use without a permit and failure to renew expired permits.

Non-compliant permits are referred to the Environmental Resource Compliance Unit only after the Compliance Unit has sent out the required non-compliance notices. It appears that the small number of non-compliant permits referred for enforcement action is a direct result of the inactive monitoring of permit compliance and the fact that few permit holders are sent notices of non-compliance. Referring non-compliant permits for

enforcement action it important since enforcement ensures that violators do not have an advantage over permit holders who adhere to the limiting conditions of their permits.

Comparison of District's Monitoring Procedures to Other Water Management Districts'

During our audit entrance conference discussion, we suggested that Water Use Compliance staff contact the St. Johns River and Southwest Florida Water Management Districts to determine their compliance procedures and determine whether the District could use any of their procedures to improve its compliance monitoring process. The Compliance Supervisor has contacted the other Districts and obtained some preliminary information; however, he is still awaiting additional information.

Based on the information obtained, it appears that there are similarities and differences among the Districts. For example, the District's Compliance Unit reviewers are responsible for "chasing" missing data. The Southwest Florida Water Management District uses temporary workers (with some technical expertise) to "chase" missing data at. After the additional data is received and analyzed by the Compliance Unit, it may be advantageous to meet with the other Districts to obtain further details and determine whether the District can use any of their monitoring and enforcement tools and techniques to improve compliance monitoring.

Recommendations

- 1. Supplement the Water Use Compliance Unit's staffing levels to improve compliance with water use permit limiting conditions and to increase analyses of data submitted by permit holders.**

Management Response: Management concurs with the recommendation. In the recently approved FY 08 budget, three new FTEs were approved to be added to the Water Use Compliance Section. Some water use compliance functions will continue to be handled through contract resources.

In addition, the Water Use Compliance Section was moved from the Water Use Permitting Division and integrated with the Environmental Resource Compliance

Division. Merging the compliance functions for water use and environmental resource permitting into one Division is anticipated to increase efficiency and effectiveness of the District's compliance efforts.

Responsible Department: Environmental Resource Regulation and Water Supply

Estimated Completion: October 1, 2007

2. Develop a plan that would improve the integrity of the data contained in the Water Use Compliance database.

Management Response: Management concurs with the recommendation. A plan will be developed for improving the integrity of the data in the Water Use Compliance database. The plan is anticipated to include measures for instituting data validation points for all data entering the database (e.g. self compliance internet web-based forms); providing customers with examples of all types of input; utilizing current GIS County parcel information; correcting all Water Use GIS layers to match property boundaries; and hiring a full-time data steward for data correction and further validation for anomalies.

Responsible Department: Environmental Resource Regulation & Information Technology

Estimated Completion: June 30, 2008

3. Re-evaluate the operations of the Water Use Compliance Unit and require that greater emphasis be placed on utilizing the Water Use Compliance Database reports to identify and resolve non-compliant permits.

Management Response: Management concurs with this recommendation. Management has already moved the Water Use Compliance Unit to the Environmental Resource Compliance Division and has started the process of

prioritizing the Unit's responsibilities. Standard procedures will be established for utilizing the database to identify, review and follow-up of non-compliance permits.

Due to staffing limitations, compliance priorities will be established based on size of the allocation and the potential for resource harm associated with the permitted water use – i.e., public water supply, diversion and impoundment, etc.

Responsible Department: Environmental Resource Regulation

Estimated Completion: June 30, 2008

4. Implement procedures to increase the number of notices of non-compliance being sent to permit holders and the number of cases referred for enforcement action.

Management Response: Management agrees with this recommendation. In order to increase the number of notices of non-compliance, Management must update current procedures, set benchmarks for each area of coverage and make more effective use of information technologies such as: easy-to-use internet-based input forms with greater data validation; a self-compliance reporting tool; and ease-to-use internet-based data retrieval tool. Integrating the Water Use Compliance Unit with the enforcement unit and increasing enforcement penalties for non-compliance issues are expected to result in improved overall water use compliance.

Due to staffing limitations, compliance priorities will be established based on size of the allocation and the potential for resource harm associated with the permitted water use – i.e. public water supply, diversion and impoundment, etc.

Responsible Department: Environmental Resource Regulation and Water Supply.

Estimated Completion: June 30, 2008 and then continuing evaluation of the Water Use Permitting Program and the ensuing compliance conditions

5. **Ensure that information received from the other water management districts is analyzed by the Compliance Unit. In addition, consider coordinating a meeting with the other districts' staff to obtain further details to determine whether the Compliance Unit can use any of their monitoring and enforcement tools and techniques to improve compliance monitoring.**

Management Response: Management concurs with this recommendation. The regulatory staff of the State's five water management districts routinely meet on a quarterly basis. Management will coordinate a meeting specifically with the water use compliance staff from the larger water management districts and/or plan an office visit to seek information from their programs that may assist in improving the District's compliance monitoring and enforcement program.

Responsible Department: Environmental Resource Regulation

Estimated Completion: June 30, 2008