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*Agency of Agriculture Food & Markets*

Julie Moore, Secretary  
Vermont Agency of Natural Resources  
1 National Life Drive  
Davis 2  
Montpelier, Vermont 05620-3901

March 18, 2019

Dear Secretary Moore,

Enclosed please find the FY 2018 Annual Report for the Agricultural Water Quality Enforcement Program.

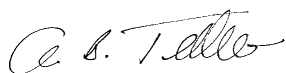
Please note that this is a comprehensive enforcement report that includes inspections conducted to determine compliance with the Required Agricultural Practices (RAP) Regulations and Medium and Large Farm Operations permits. The report summarizes the efforts of the Agency's five Water Quality Specialists assigned to the Medium and Large Farm Operations Programs, five Water Quality Specialists assigned to the Small Farm Operations Program, an Agricultural Water Quality Section Chief, a Chief Policy Enforcement Officer, an Enforcement Coordinator, a Program Technician, a state-wide Conservation Reserve Enhancement Program (CREP) Coordinator, and six Agricultural Engineers.

In addition, this year's report summarizes the Agency's inspection, enforcement, and engineering/technical assistance efforts over the 2018 State Fiscal Year (FY 2018). All previous Agricultural Water Quality Enforcement Program Annual Reports (Water Quality Enforcement Report) developed by the Agency have outlined enforcement efforts conducted over a full calendar year. However, since a majority of the reports generated by the Agency and other State Agencies conducting work to improve the State's water quality are based on the State Fiscal Year, the Agency decided to transition the format of the Water Quality Enforcement Report to cover water quality enforcement efforts on a State Fiscal Year, which runs from July 1 to June 30. As a result, this report will contain some data that was presented in the 2017 Water Quality Enforcement Report, which reported on data from the 2017 calendar year, in addition to the Agency's water quality enforcement efforts undertaken from January 1, 2018 through June 30, 2018.

The Annual Report's Appendix presents our compliance and enforcement efforts in graphic form. We may use this Appendix as a stand-alone document that will provide a more easily "digestible" representation of our efforts over the past year.

If you have any questions or concerns regarding this report, please feel free to contact Laura DiPietro, Water Quality Division Director, (802) 595-1990, or David Huber, Chief Policy Enforcement Officer, (802) 461-7160.

Sincerely,



Anson B. Tebbetts, Secretary  
Vermont Agency of Agriculture, Food and Markets



cc: Emily Boedecker, Commissioner  
Department of Environmental Conservation

Peter LaFlamme, Director  
VT DEC Watershed Management Division

Representative Carolyn Partridge, Chair  
House Committee on Agriculture and Forestry

Representative Amy Sheldon, Chair  
House Committee on Natural Resources, Fish, and Wildlife

Senator Robert Starr, Chair  
Senate Committee on Agriculture

Senator Christopher Bray, Chair  
Senate Committee on Natural Resources and Energy

## Vermont Agency of Agriculture, Food and Markets Agricultural Water Quality Enforcement Program State Fiscal Year 2018 Annual Report

Required Agricultural Practices Regulations Enforcement  
Medium Farm Operation General Permit Enforcement  
Large Farm Operation Individual Permit Enforcement  
Engineering and Technical Assistance

Dear Reader,

March 18, 2019

The Water Quality Division of the Vermont Agency of Agriculture, Food and Markets (VAAFMM) implements a comprehensive approach to the regulation of farms in the State in order to best protect water resources. The development of a three-tiered approach to the regulation of Vermont farms allows for a logical progression in regulatory oversight as a farm grows in size from a Small Farm Operation (SFO)/Certified Small Farm Operation (CSFO) subject to regulation under the Required Agricultural Practices Regulations (RAPs), to a Medium Farm Operation (MFO) regulated under the state's MFO General Permit, to a Large Farm Operation (LFO) regulated under an individual LFO permit.

In State Fiscal Year (FY) 2018, the Water Quality Division was heavily focused on revising the RAPs to include regulatory requirements for reducing nutrient contributions to waters of the State from subsurface tile drainage as required by Act 64 and revising the General Permit for Medium Farm Operations (MFO) which went into effect on June 12, 2018. The Water Quality Division continues to utilize our staff to focus on:

- evaluating farms of all sizes for compliance with the newly revised RAPs;
- conducting inspections of Certified Small Farm Operations (CSFOs) and introducing them to the revised RAP requirements;
- implementing an accelerated schedule of MFO inspections (from once every five years to once every three years as mandated by Act 64);
- working with the RAP Development Committee, which was convened in FY 2018 and is composed of farmers who help inform the Agency on process and procedure as the Agency implements the multifaceted RAP rule;
- enhancing communication efforts to the farming and non-farming community regarding the Agency's agricultural water quality protection regulations;
- conducting ongoing staff training on nutrient management planning, RAP implementation, investigative principles, and report writing skills;
- conducting compliance checks to ensure that farmers receiving funds under the Farm Agronomic Practices (FAP) grant program are complying with the terms of their agreements; and,
- conducting compliance checks on farms as requested by land conservancy and lender groups.

### TREND ANALYSIS OF ENFORCEMENT EFFORTS

Figure 1 provides a trend analysis of the Agency's Agricultural Water Quality enforcement efforts since 2010.

- Inspection/investigation numbers have increased steadily starting in 2015 as the Agency has added additional staff to work in the Water Quality Division.
- The number of enforcement actions issued to farms spiked in 2012 and 2013 as a result of the Agency taking enforcement action against MFOs that either failed to submit their Notice of Intent to Comply (NOIC) with the renewed MFO General Permit or failed to send in their MFO Annual Report.

- The number of enforcement actions issued to farms in 2017 and FY 2018 has steadily increased as actions are issued for a Farm’s failure to submit MFO or LFO Annual Operating Fees, or failure to comply with annual reporting requirements.
- Please note that the total number of visits to farms each year far exceeds the number of inspections/investigations reported in this graphic and includes technical and engineering assistance visits quantified within this report.

**Figure 1. Water Quality Enforcement Efforts From 2010 Through FY 2018.**



**Table 1. The Numbers of Enforcement Efforts Spanning the Years from 2010-FY 2018.**

Numbers of Enforcement Efforts from 2010-FY 2018									
Year	2010	2011	2012	2013	2014	2015	2016	2017	FY 2018
# of Inspections/Investigations	325	275	278	286	343	506	379	505	652
# of Farms Receiving Enforcement Actions	17	15	68	46	39	28	38	82	101

Information about the RAPs, the MFO general permit program, and the LFO individual permit program can be found at the following links:

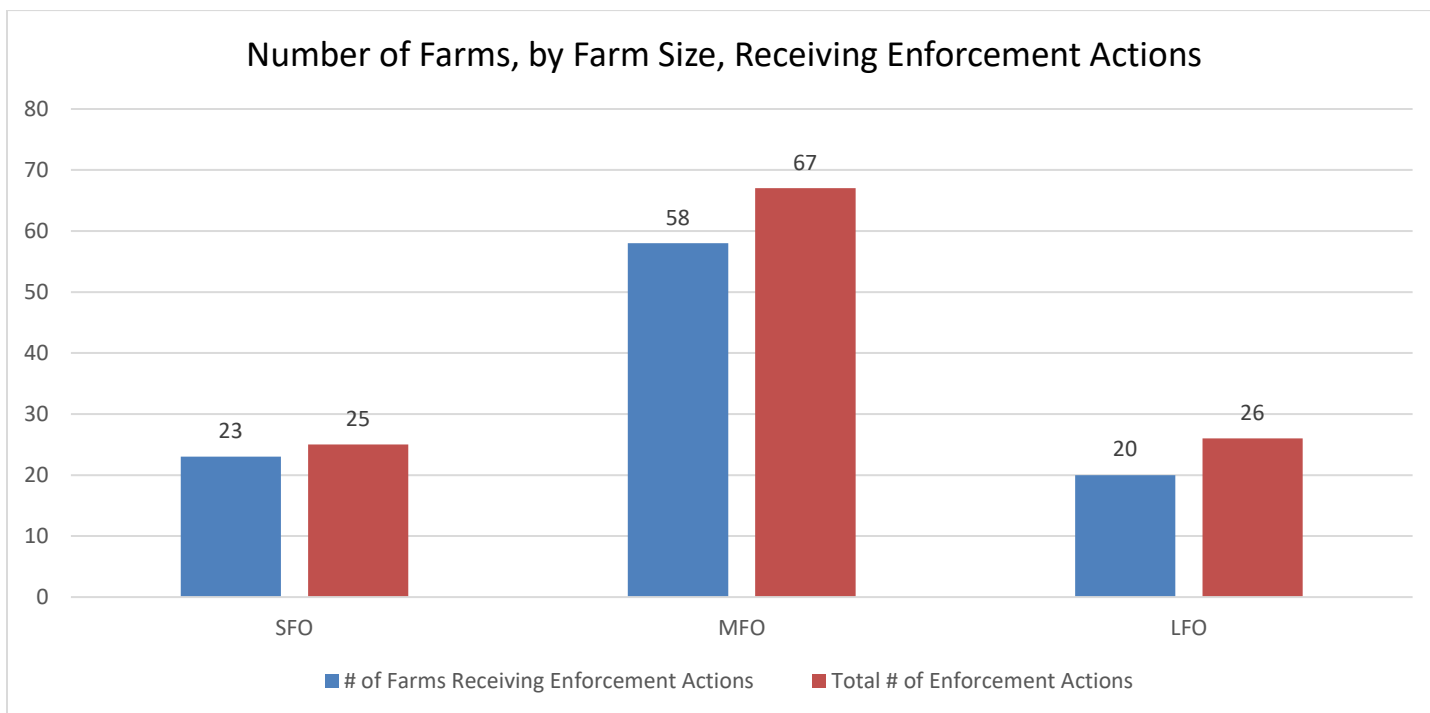
- RAPs  
<https://agriculture.vermont.gov/rap>
- MFO General Permit Program  
<https://agriculture.vermont.gov/mfo>
- LFO Permitting Program  
<https://agriculture.vermont.gov/lfo>

The following report summarizes the Agency’s inspection, enforcement, and engineering/technical assistance efforts over the 2018 State Fiscal Year (FY 2018). All previous Agricultural Water Quality Enforcement Program Annual Reports (Water Quality Enforcement Report) developed by the Agency have outlined enforcement efforts conducted over a full calendar year. However, since a majority of the reports generated by the Agency and other State Agencies conducting work to improve the State’s water quality are based on the State Fiscal Year, the Agency decided to transition the format of the Water Quality Enforcement Report to cover water quality enforcement efforts on a State Fiscal Year, which runs from July 1 to June 30. As a result, this report will contain some data that was presented in the 2017 Water Quality Enforcement Report, which reported on data from the 2017 calendar year, in addition to the Agency’s water quality enforcement efforts undertaken from January 1, 2018 through June 30, 2018.

In FY 2018, the Agency performed a total of 1,356 inspections/visits to farms to determine compliance with the RAPs, the MFO General Permit and Rule, the LFO Individual Permits and Rule, and to offer technical and engineering assistance to help farms comply with regulatory requirements. **“Inspections”** represent a formal inspection done on a farm to assess compliance with a rule and/or permit, either as a routine compliance check or as a result of a complaint received by the Agency, and include **“Programmatic Follow-up Inspections”**, which are conducted to resolve issues identified during inspections that did not go to enforcement, **“Regulatory Program Assistance”**, which is conducted to discuss regulatory programs and permitting issues with farms, and does not include a walk-around inspection of the farm, and **“Enforcement Action Follow-up Inspections”**, which are conducted to specifically evaluate a farm’s progress in correcting issues cited in enforcement actions. **“Visits”** are representative of technical and engineering assistance provided on the ground.

**In FY 2018, 101 farms received a total of 118 formal enforcement actions.** 30 farms were referred to the Vermont Agency of Natural Resources, Department of Environmental Conservation (DEC) for suspected direct discharges of wastes to surface water. Seven farms were referred to the Attorney General’s Office for further enforcement.

**Figure 2. Number of Farms, by Farm Size, Receiving Enforcement Actions.**



**SMALL FARM OPERATION (SFO)/CERTIFIED SMALL FARM OPERATION (CSFO)<sup>1</sup> COMPLIANCE REPORT**

**RAP Compliance and Assistance:** In FY 2018, a total of 895 visits were made to SFO/CFOs. Of these, 376 inspections were conducted to assess compliance with the RAPs. 519 visits were conducted to offer technical and engineering assistance.

**Table 2. SFO/CSFO Visits**

<b>Total Number of SFO/CSFO Visits</b>	<b>895</b>
<b>SFO/CSFO Inspections</b>	<b>376</b>
Complaints from the public	<b>121</b>
▪ <i>Complaints resulting in enforcement</i>	<b>11</b>
Compliance checks	73 facilities (representing 65 SFO/CSFOs)
▪ <i>Compliance checks resulting in enforcement</i>	<b>2</b>
SFO/CSFO Programmatic Follow-up Inspections	<b>8</b>
SFO/CSFO Enforcement Action Follow-up Inspections	<b>9</b>
SFO/CSFO Regulatory Program Assistance	165
<b>SFO Technical Assistance / Engineering Visits</b>	<b>519</b>

The 65 SFO/CSFOs assessed for compliance represent a total of 73 individual facilities inspected. One SFO/CSFO can consist of more than one facility managed as part of the SFO/CSFO. Each facility is subjected to a comprehensive compliance assessment.

**In FY 2018, 23 SFO/CSFOs received a total of 25 enforcement actions.** Specifically, as a result of compliance efforts conducted in FY 2018 and reported in Table 2 above, 13 SFO/CSFOs received a total of 15 formal enforcement actions for violations of the RAPs. In addition, since this report now summarizes the Agency’s enforcement efforts on a fiscal year basis, we report that an additional ten farms received a total of ten enforcement actions in FY 2018 based on inspections conducted during FY 2017. These are reported in Table 2a below. 21 SFO/CSFOs were referred to DEC for suspected direct discharges of waste to surface water, and two SFO/CSFOs were referred to the Attorney General’s Office for further enforcement.

**Table 2a – SFO/CSFO Enforcement Actions**

<b>Enforcement Actions</b>	<b>Number of FY2018 Cases</b>	<b>Number of FY2017 Cases</b>
Corrective Action Letter (CAL)	<b>9</b>	<b>10</b>
Cease and Desist Order (CDO)	<b>3</b>	
Notice of Violation with Administrative Penalty (NOV)	<b>1</b>	
▪ Assurance of Discontinuance (AOD)	<b>1</b>	
▪ Final Order	<b>1</b>	
<b>SFO In-Field Corrections (verbal warnings)</b>	<b>14</b>	<b>3</b>
<b>SFO Referrals</b>		
Department of Environmental Conservation (DEC) <sup>2</sup>	<b>21</b>	
Attorney General’s Office (AGO)	<b>2</b>	
<b>SFO Cases in Continuance</b>	<b>13</b>	

<sup>1</sup> Certified Small Farm Operations (CSFOs) are farms above a particular farm size that are required to certify compliance with the RAPs on an annual basis, develop a nutrient management plan (NMP), obtain four hours of approved water quality training every five years, and be inspected by the Agency every seven years.

<sup>2</sup> Under a MOU with ANR, cases involving suspected point source discharges of waste to water are referred to DEC for investigation.

## MEDIUM FARM OPERATION (MFO) GENERAL PERMIT COMPLIANCE REPORT

**MFO General Permit Compliance:** In FY 2018, a total of 225 visits were made to MFOs. Of these, 103 inspections were conducted to assess compliance with the State’s MFO General Permit, MFO Rule, and the RAPs. 122 visits were conducted to offer technical and engineering assistance.

**Table 3 – MFO Visits**

Total Number of MFO Visits	225
<b>MFO Inspections</b>	<b>103</b>
Complaints from the public	21
▪ <i>Complaints resulting in enforcement</i>	3
Compliance checks	31 facilities (representing 23 MFOs)
▪ <i>Compliance checks resulting in enforcement</i>	7
MFO Programmatic Follow-up Inspections	21
MFO Enforcement Action Follow-up Inspections	20
• Enforcement Action follow-ups resulting in further enforcement	1
MFO Regulatory Program Assistance	10
<b>MFO Technical Assistance / Engineering Visits</b>	<b>122</b>

The 23 MFOs assessed for compliance represent a total of 31 individual facilities inspected. One MFO can consist of more than one facility managed as part of the MFO. Each facility is subjected to a comprehensive compliance assessment. Act 64 now requires that MFOs be inspected every three years, as opposed to the previous five-year inspection cycle. 122 visits to MFOs involved providing technical/engineering assistance to farmers.

**In FY 2018, 58 MFOs received a total of 67 formal enforcement actions.** Specifically, as a result of compliance efforts conducted in FY 2018 and reported in Table 3 above, 11 MFOs received a total of 11 formal enforcement actions for violations of the MFO General Permit and/or the RAPs. An additional 31 farms received a total of 40 enforcement actions for either failing to pay the Annual MFO Operating Fee or failing to submit their Annual MFO Compliance Report and/or GIS Shape files. As these actions are not the result of on farm compliance efforts, they are not represented in Table 3, but they are included in Table 3a below. An additional 16 farms received a total of 16 enforcement actions in 2018 based on inspections conducted during FY 2017. These are also reported in Table 3a below. Six MFOs were referred to DEC for suspected point source discharges of waste to surface water, and two MFOs were referred to the Attorney General’s Office for further enforcement.

**Table 3a – MFO Enforcement Actions**

Enforcement Actions	Number of FY2018 Cases	Number of FY2017 Cases
6 V.S.A. Section §4991(7) Letter		
Corrective Action Letter (CAL)	<b>26</b>	<b>16</b>
Cease and Desist Order (CDO)	<b>2</b>	
Notice of Violation with Administrative Penalty (NOV)	<b>20</b>	
▪ Assurance of Discontinuance (AOD)		
▪ Final Order (FO)	<b>3</b>	
<b>MFO In-Field Corrections (verbal warnings)</b>	<b>3</b>	
<b>MFO Referrals</b>		

Department of Environmental Conservation (DEC) <sup>3</sup>	6	2
Attorney General's Office (AGO)	2	
<b>MFO Cases in Continuance</b>	<b>6</b>	

**LARGE FARM OPERATIONS (LFO) INDIVIDUAL PERMIT COMPLIANCE REPORT**

**LFO Individual Permit Compliance:** In FY 2018, a total of 236 visits were made to LFOs. Of these, 173 inspections were conducted to assess a farm's compliance with their LFO Individual Permit, the LFO Rules, and the RAPs. 63 visits were conducted to offer technical and engineering assistance.

**Table 4 – LFO Visits**

<b>Total Number of LFO Visits</b>	<b>236</b>
<b>LFO Inspections</b>	<b>173</b>
Complaints from the public	24
▪ <i>Complaints resulting in enforcement</i>	3
Compliance checks	118 facilities (representing 40 LFOs)
▪ <i>Compliance checks resulting in enforcement</i>	7
LFO Programmatic Follow-up Inspections	10
LFO Enforcement Action Follow-up Inspections	9
LFO Regulatory Program Assistance	12
<b>LFO Technical Assistance / Engineering Visits</b>	<b>63</b>

The 40 LFOs assessed for compliance represent a total of 118 individual facilities inspected. One LFO can consist of more than one facility managed as part of the LFO. Each facility is subjected to a comprehensive compliance assessment. There are 33 permitted LFOs in the State and each gets inspected on a calendar year basis. Because this report now summarizes inspection efforts on a fiscal year basis, a single LFO may have been inspected twice within the reporting time frame.

**In FY 2018, 20 LFOs received a total of 26 formal enforcement actions.** Specifically, as a result of compliance efforts conducted in FY 2018 and reported in Table 4 above, ten LFOs received a total of ten enforcement actions for violations of the LFO Rule and/or the RAPs. An additional nine LFOs received a total of 14 enforcement actions for failing to pay the Annual LFO Operating Fee. As these actions are not the result of on farm compliance efforts, they are not represented in Table 4, but they are included in Table 4a below. One additional LFO received a total of two enforcement actions in 2018 based on inspections conducted during FY 2017. These are also reported in Table 4a below. Three LFOs were referred to DEC for suspected direct discharges of waste to surface water, and three LFOs were referred to the Attorney General's Office for further enforcement.

**Table 4a – LFO Enforcement Actions**

<b>Enforcement Actions</b>	<b>Number of FY2018 Cases</b>	<b>Number of FY2017 Cases</b>
6 V.S.A. Section §4991(7) Letter		
Corrective Action Letter (CAL)	<b>14</b>	
Cease and Desist Order (CDO)		
Emergency Administrative Order (EAO)	<b>1</b>	
Notice of Violation with Administrative Penalty (NOV)	<b>8</b>	<b>1</b>

<sup>3</sup>Under a MOU with ANR, cases involving suspected point source discharges of waste to water are referred to DEC for investigation.



▪ Assurance of Discontinuance (AOD)		<b>1</b>
▪ Final Order (FO)	<b>1</b>	
Actions Pending		
<b>LFO In-Field Corrections (verbal warnings)</b>		
<b>LFO Referrals</b>		
Department of Environmental Conservation (DEC) <sup>4</sup>	<b>3</b>	
Attorney General’s Office (AGO)	<b>3</b>	
<b>LFO Cases in Continuance</b>	<b>3</b>	

**SUMMARY OF ENFORCMENT ACTIONS AND REFERRALS BY BASIN**

**Table 5. Number of Enforcement Actions and Referrals Summarized By Basin**

Basin	Number of Enforcement Actions	Referrals
Battenkill-Walloomsac-Hoosic	5	
Southern Lake Champlain	19	DEC-1
Otter Creek-Little Otter Creek-Lewis Creek	20	DEC-8 AGO-3
Northern Lake Champlain	16	DEC-3
Missisquoi	22	DEC-11 AGO-2
Lamoille	4	DEC-1
Winooski	4	DEC-2
White	1	
Ottauquechee-Black-CT Direct	1	DEC-1
West-Williams-Saxtons-CT Direct		
Deerfield-CT Direct		
Stevens-Wells-Waits-Ompompanoosuc-CT Direct	1	DEC-1
Passumpsic	2	DEC-1
Upper Connecticut	6	
Lake Memphremagog	17	DEC-1 AGO-2

<sup>4</sup> Under a MOU with ANR, cases involving suspected direct discharges of waste to water are referred to DEC for investigation.

**SUMMARY OF ENFORCMENT ACTIONS ISSUED DUE TO RAP VIOLATIONS, MFO GENERAL PERMIT OR LFO INDIVIDUAL PERMIT VIOLATIONS, and ASSOCIATED NUMBER OF COUNTS/VIOLATIONS**

**Key for Table 6**

- AOD** = Assurance of Discontinuance
- CAL** = Corrective Action Letter
- CDO** = Cease and Desist Order
- EAO** = Emergency Administrative Order
- FO** = Final Order
- NOV** = Notice of Violation
- PA** = Case Permanently Abeyed/Closed

**Table 6. Enforcement Actions Issued by General Nature of Violation of RAP Regulations, MFO General Permit, and LFO Individual Permit.**

General Nature of Violation	Actual Number of Individual Counts/Violations <sup>5</sup>	Enforcement Actions Issued
<b>SFO Compliance</b>		
Field Practices	5	CAL (3)
Productions Area	43	CAL (17), CDO (3), NOV (1), AOD (1), Final Order (1)
<b>MFO Permit Compliance</b>		
Annual Fee Payment / Reporting	44	CAL (19), NOV (18), Final Order (3)
Field Practices	15	CAL (10), NOV (1)
Production Area	62	CAL (19), CDO (2), NOV (2)
Recordkeeping/NMP	11	CAL (7), NOV (1)
Permitting	2	CAL (1)
<b>LFO Permit Compliance</b>		
Annual Fee Payment / Reporting	14	CAL (6), NOV (3), Final Order (1)
Field Practices	14	CAL (5), NOV (2), AOD (1)
Production Area	19	CAL (5), NOV (1), EAO (1)
Recordkeeping / NMP	6	CAL (1), NOV (1)
Permitting	5	CAL (2), NOV (1)
<b>TOTAL</b>	<b>240</b>	

**Questions regarding the Vermont Agricultural Water Quality Enforcement Program or this report in general can be directed to VAAFM Agricultural Resource Management Division:**

**(802) 828-2431 or [agr.waterquality@vermont.gov](mailto:agr.waterquality@vermont.gov)**

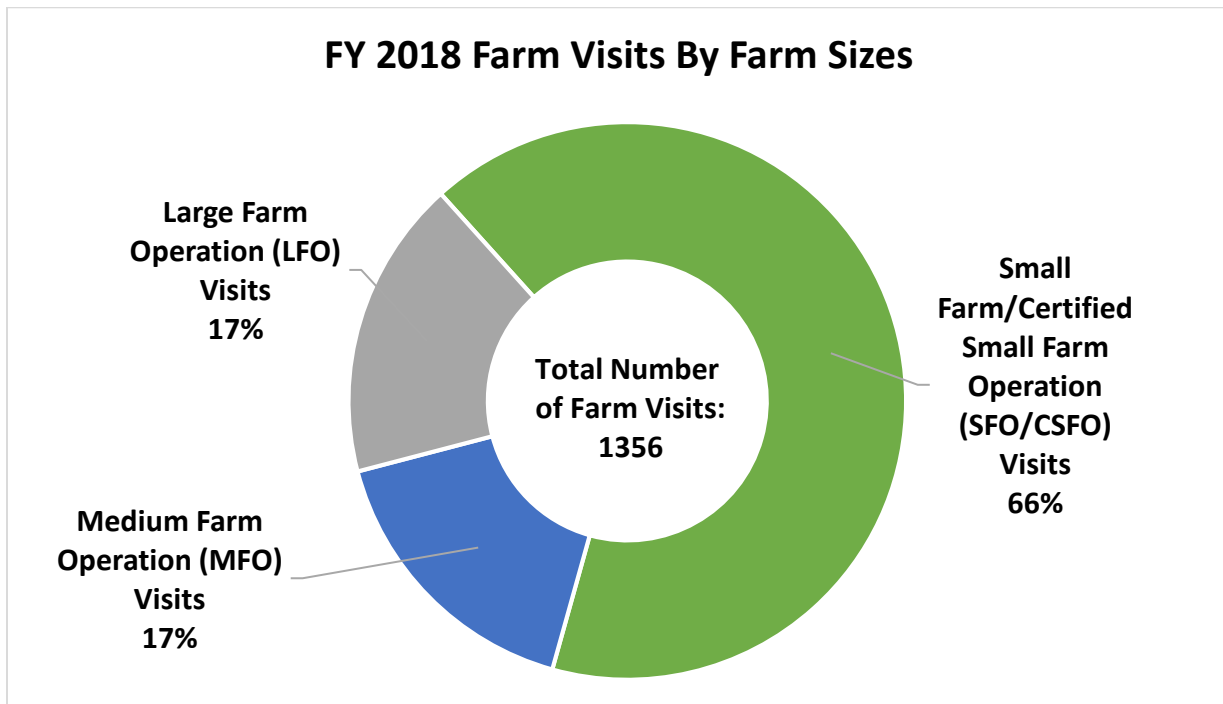
<sup>5</sup> An enforcement action may include more than one count/violation of the RAPs or MFO/LFO permit requirements, so numbers of counts/violations may exceed the total number of enforcement actions issued. In addition, the total number of enforcement actions listed in Table 6 exceeds the 118 enforcement actions issued in FY 2018. If an enforcement action contains counts for more than one "General Nature of Violation", that action is listed multiple times for each different violation contained in the action.

## Vermont Agency of Agriculture, Food and Markets Agricultural Water Quality Enforcement Program FY 2018 Report – Appendix

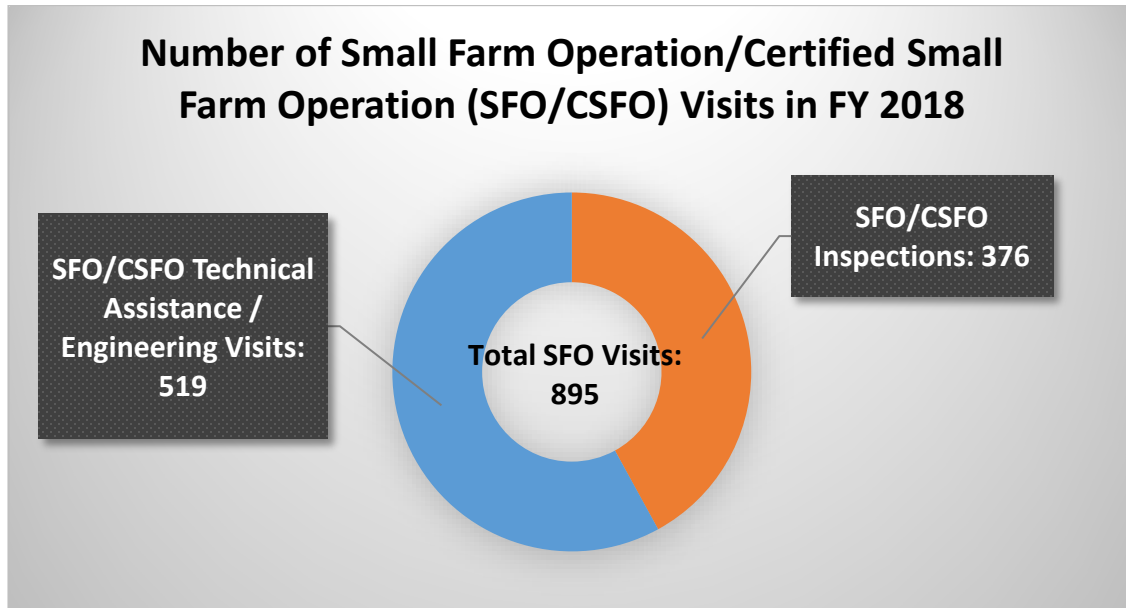
Required Agricultural Practices Regulations Enforcement  
Medium Farm Operation General Permit Enforcement  
Large Farm Operation Individual Permit Enforcement  
Engineering and Technical Assistance

This Appendix is a companion piece to the FY 2018 Agricultural Water Quality Enforcement Program Report and is intended to provide a graphic representation of the enforcement and compliance assistance efforts undertaken by the Agency during FY 2018. If you are interested in reviewing the actual data on which these graphics are based, please consult the FY 2018 Report. You can obtain a copy of the report by contacting the Agency at (802) 828-2431, or by visiting the Agency’s website at: <https://agriculture.vermont.gov/water-quality/enforcement-compliance>

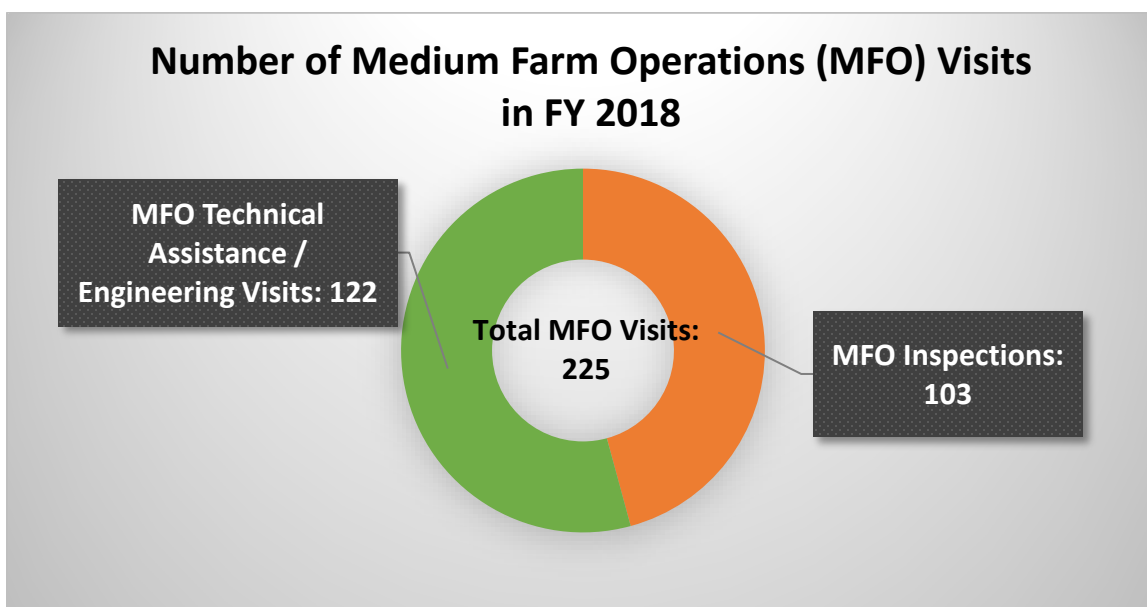
Figure 1. In FY 2018, the Agency performed a total of 1,356 inspections/visits of farms to determine compliance with the Required Agricultural Practices (RAPs) Regulations, the Medium Farm Operation (MFO) General Permit, and the Large Farm Operation (LFO) Rule and individual permits, and to offer technical and engineering assistance. Overall regulatory compliance rates are high for farms of all sizes and exceed 84%.



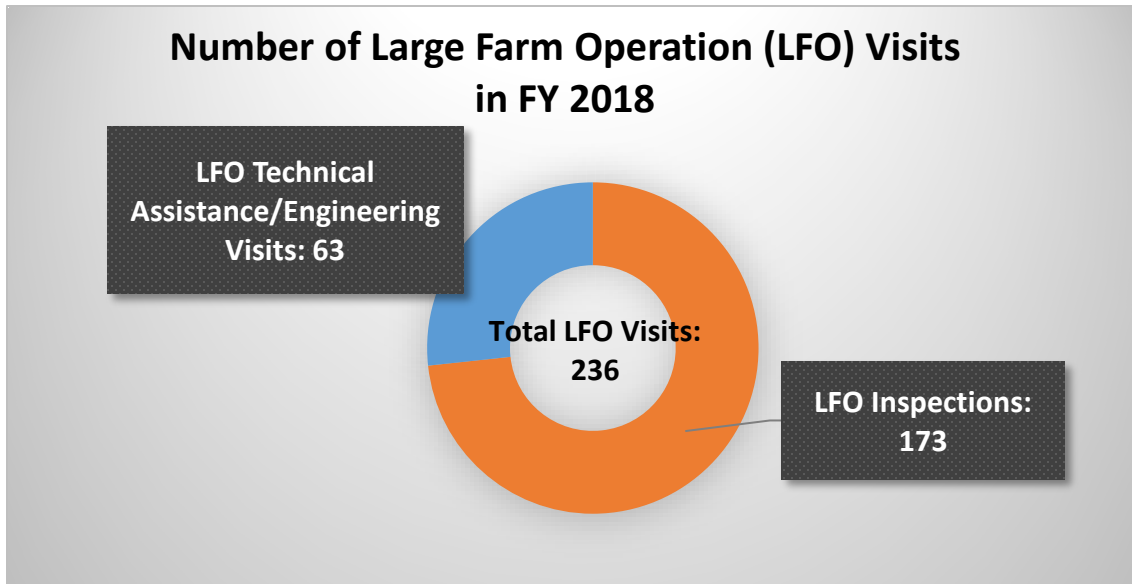
**Figure 2. RAP Compliance and Assistance:** In FY 2018, a total of 895 visits were made to SFOs and CSFOs. CSFOs are farms above a particular farm size that are required to certify compliance with the RAPs on an annual basis, develop a nutrient management plan (NMP), obtain four hours of approved water quality training every five years, and be inspected by the Agency every seven years. Of these, 376 inspections were conducted to determine compliance with the RAPs, and 519 visits were conducted to offer technical and engineering assistance.



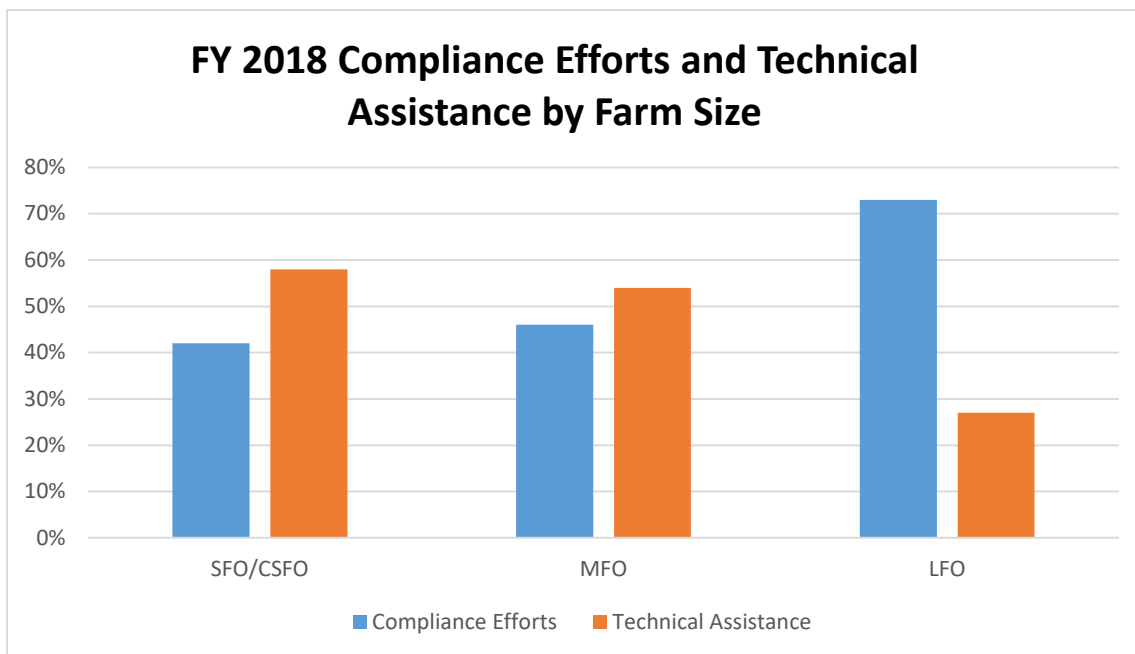
**Figure 3. MFO General Permit Compliance:** In FY 2018, a total of 225 visits were made to MFOs. Of these, 103 inspections were conducted on MFOs to evaluate compliance with the State's MFO General Permit conditions.



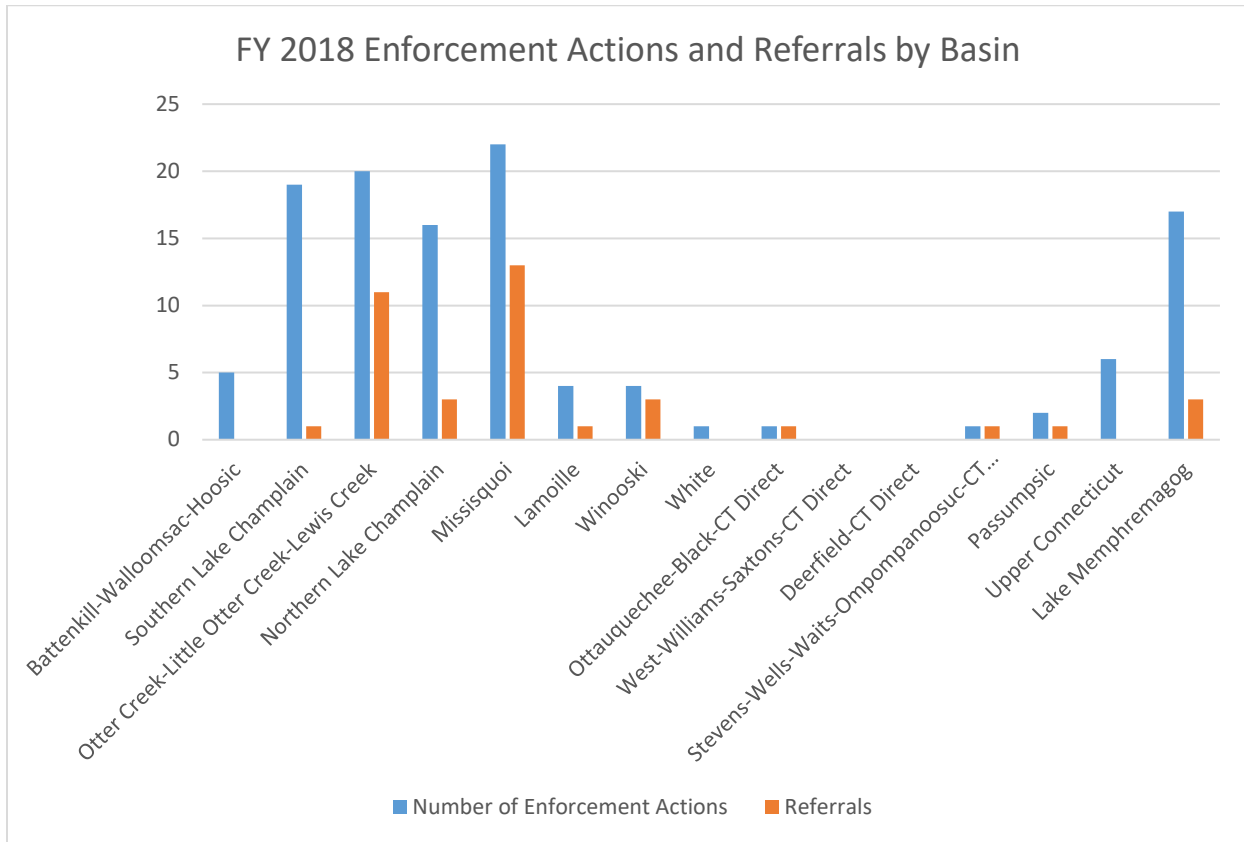
**Figure 4. LFO Individual Permit Compliance:** In 2017, a total of 236 visits were made to LFOs. Of these, 173 inspections were conducted to evaluate a farm’s compliance with the LFO Rules, individual LFO permits and/or the RAPs.



**Figure 5. The Agency provides both regulatory services and non-regulatory services in the form of technical assistance.** Technical assistance is provided by Agency engineers, a Conservation Reserve Enhancement Program (CREP) Coordinator, and Agency regulatory field staff. Agency staff will perform multiple technical assistance visits to ensure that a farm moves steadily towards achieving compliance.



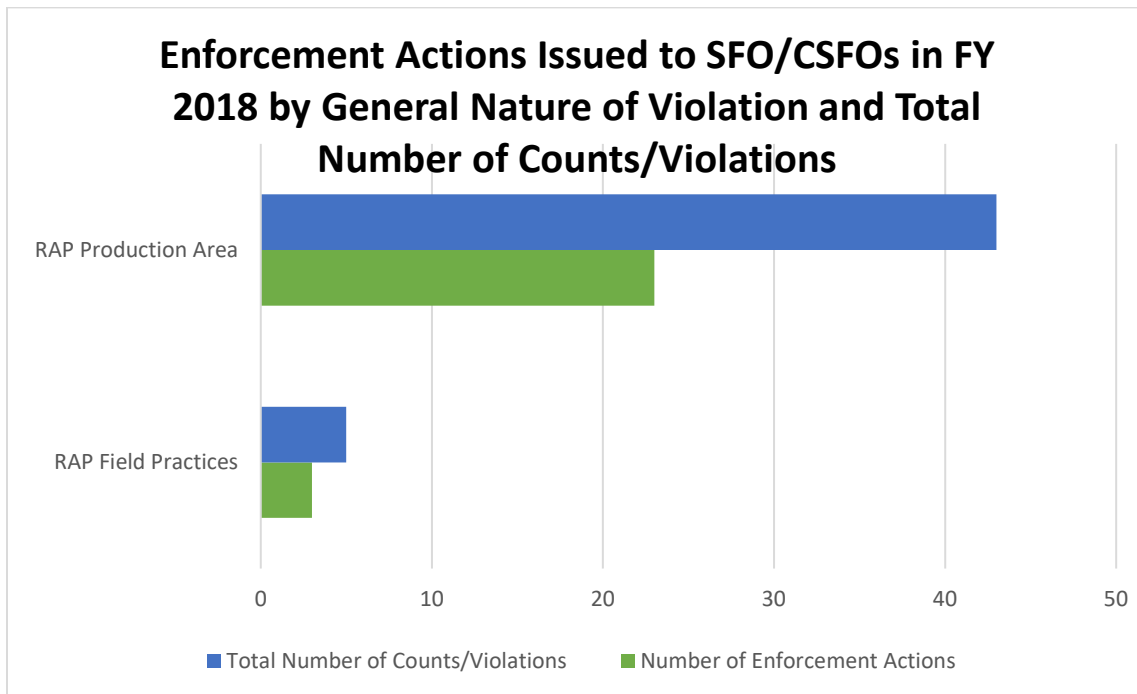
**Figure 6. This graphic is a companion piece to Table 5 in the FY 2018 Annual Report and summarizes, by Basin, the number of enforcement actions and referrals.**



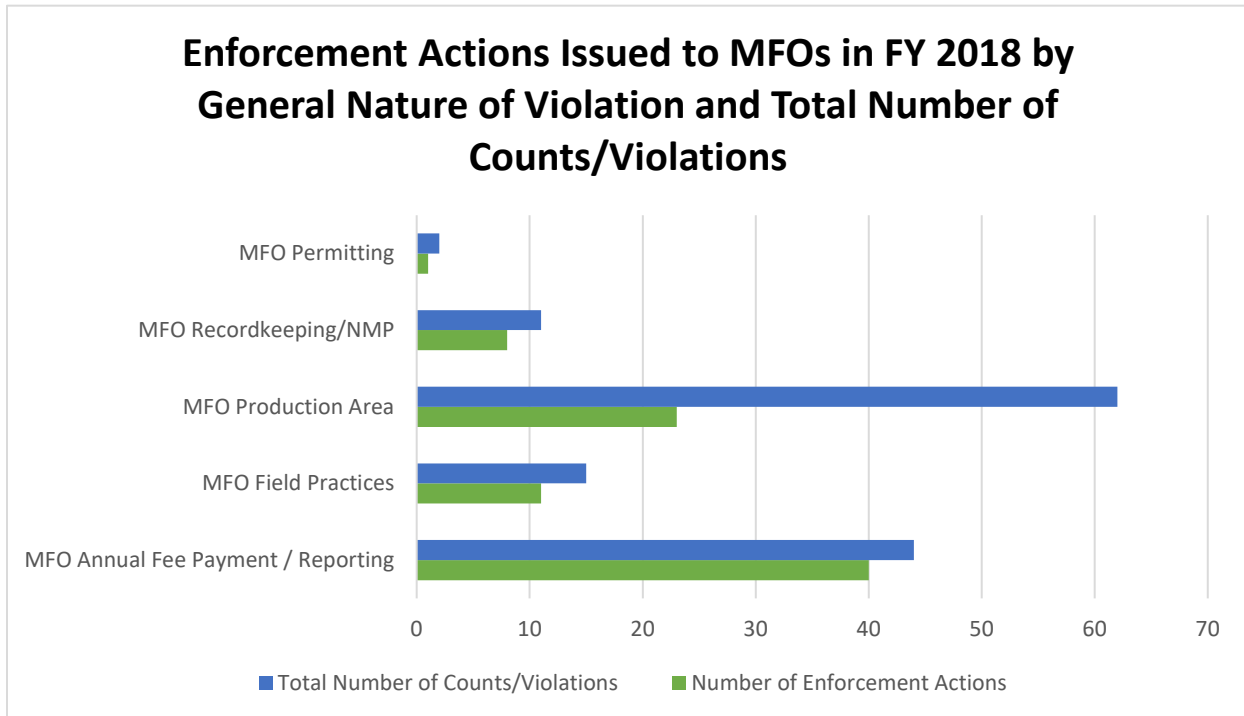
**Figures 7a, 7b, and 7c. These graphics comprise a companion piece to Table 6 in the FY 2018 Report and summarizes enforcement actions issued by general nature of violation of RAP Regulations, MFO General Permit, and LFO Individual Permit and actual number of individual counts.**

**An enforcement action may include more than one count/violation of the RAPs or MFO/LFO permit requirements, so the numbers of counts/violations may exceed the total number of enforcement actions issued. In addition, the total number of enforcement actions listed in Table 6 exceeds the 118 enforcement actions issued in FY 2018. If an enforcement action contains counts for more than one “General Nature of Violation”, then that action is listed multiple times for each different violation contained in the action. Enforcement actions issued in FY 2019 for FY 2018 cases are not included in these graphics.**

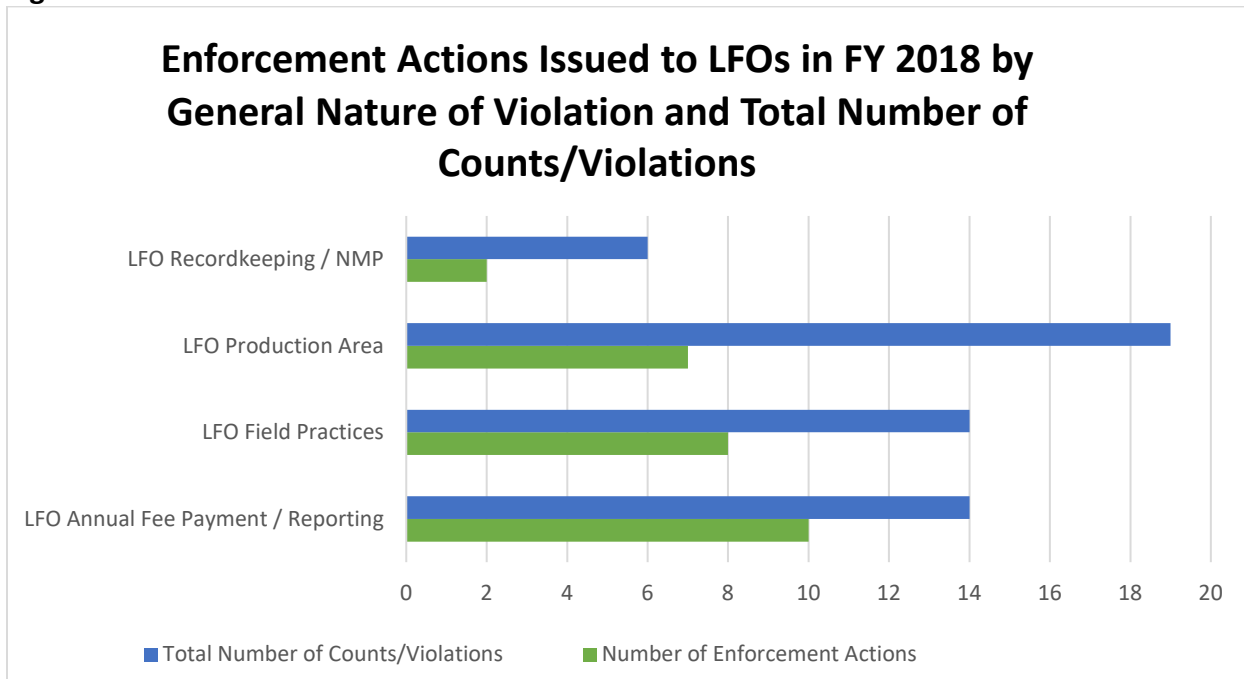
**Figure 7a.**



**Figure 7b.**



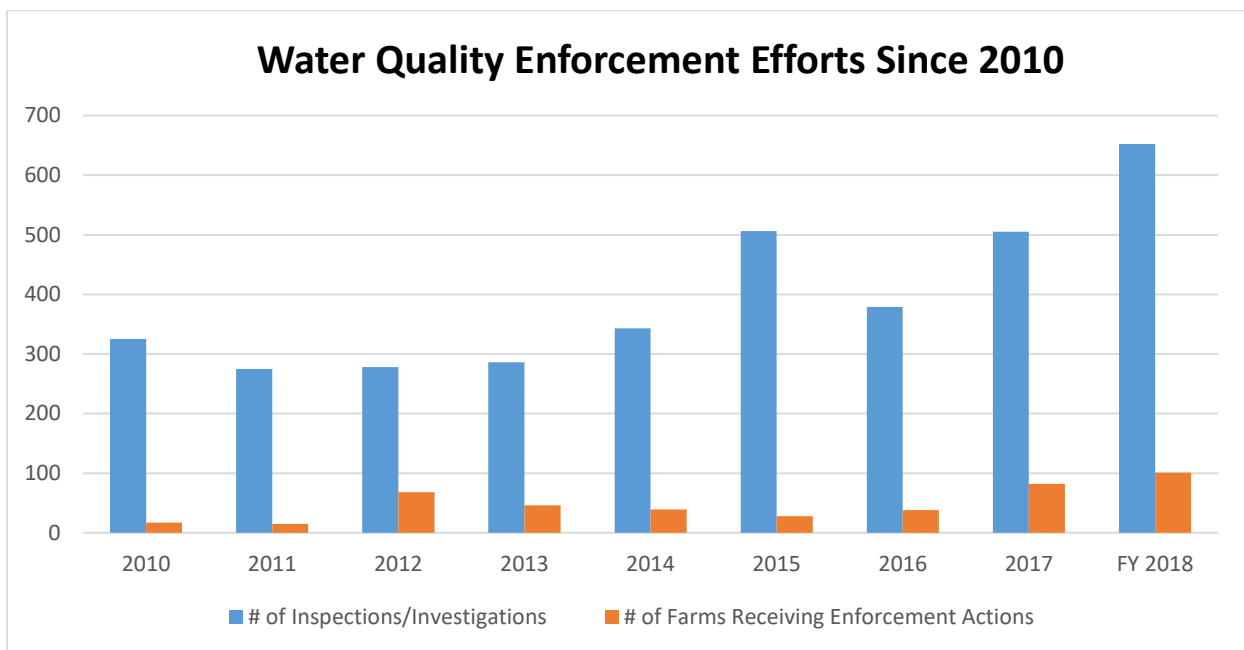
**Figure 7c.**





**Figure 8. This chart provides a trend analysis of the Agency’s agricultural water quality enforcement efforts since 2010.**

- Inspection/investigation numbers have increased steadily starting in 2015 as the Agency has added additional staff to work in the Water Quality Program.
- The number of enforcement actions issued to farms spiked in 2012 and 2013 as a result of the Agency taking enforcement action against MFOs that either failed to submit their Notice of Intent to Comply (NOIC) with the renewed MFO General Permit or failed to send in their MFO Annual Report.
- The number of enforcement actions issued to farms in 2017 and FY 2018 has steadily increased as actions are issued for a Farm’s failure to submit MFO or LFO Annual Operating Fees, or failure to comply with annual reporting requirements.
- Please note that the total number of visits to farms each year far exceeds the number of inspections/investigations reported in this graphic and includes technical and engineering assistance visits quantified within this report.



Numbers of Enforcement Efforts from 2010-FY 2018									
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