

**Vermont Agency of Agriculture, Food and Markets  
Administrative Division  
Enforcement Section**

**Agricultural Non-Point Source Water Quality Enforcement Program  
State Fiscal Year 2021 Annual Report**

October 25, 2021

Dear Reader,

The Vermont Agency of Agriculture, Food and Markets' (VAAFMM) Administration Division's Enforcement Section (Enforcement Section) works cooperatively with the VAAFMM Water Quality Division (WQ Division) to implement a comprehensive approach to the regulation of farms in the State 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 (RAP) Rule, to a Medium Farm Operation (MFO) regulated under both the Medium and Small Farm Operation Rules for Issuance of General and Individual Permits (MFO Rule) and the State's General Permit for Medium Farm Operations (MFO GP), to a Large Farm Operation (LFO) regulated under the Large Farm Operations Rules (LFO Rules) and an LFO individual permit (LFO IP). This report provides a summary of the enforcement actions taken by VAAFMM during State Fiscal Year 2021 (FY21) for alleged violations of Vermont's agricultural water quality regulations.

Title 6 of the Vermont Statutes Annotated (6 V.S.A.), Chapter 215: Agricultural Water Quality, Subchapter 10: Enforcement, provides the Secretary of VAAFMM with the necessary authority to enforce the agricultural water quality requirements of 6 V.S.A Chapter 215. Pursuant to 6 V.S.A. § 4991, when the Secretary of VAAFMM determines that a person subject to the requirements of Chapter 215 is violating a requirement of the Chapter, the Secretary shall respond to and require discontinuance of the violation. The Secretary may respond to a violation of the requirements of Chapter 215 by:

- (1) issuing a corrective action letter (CAL) under 6 V.S.A. § 4992;
- (2) issuing a cease and desist order (CDO), an emergency administrative order (EAO), a mandatory corrective action order (MCAO), or a Notice of Violation (NOV) with proposed administrative penalties, or entering into an Assurance of Discontinuance (AOD), under 6 V.S.A. § 4993;
- (3) revoking or conditioning coverage under a permit or certification under 6 V.S.A. § 4994;
- (4) bringing a civil enforcement action, under 6 V.S.A. § 4995;
- (6) referring the violation to the Secretary of Natural Resources for enforcement under 10 V.S.A. Chapter 201; or
- (7) pursuing other action, such as consulting with a farmer, within the authority of the Secretary to assure discontinuance of the violation and remediation of any harm caused by the violation (§ 4991(7) letter).

Please refer to the Glossary at the end of this report for definitions of enforcement actions typically issued by VAAFMM.

In FY21, the Enforcement Section continued to:

- Work cooperatively with the WQ Division to effectively and equitably regulate farms of all sizes.
- Hold weekly Enforcement Committee Meetings with WQ Division leadership and staff and the Vermont Attorney General's Office (AGO) legal counsel to discuss cases with alleged violations and reach agreement on how to move forward with enforcement, if appropriate.

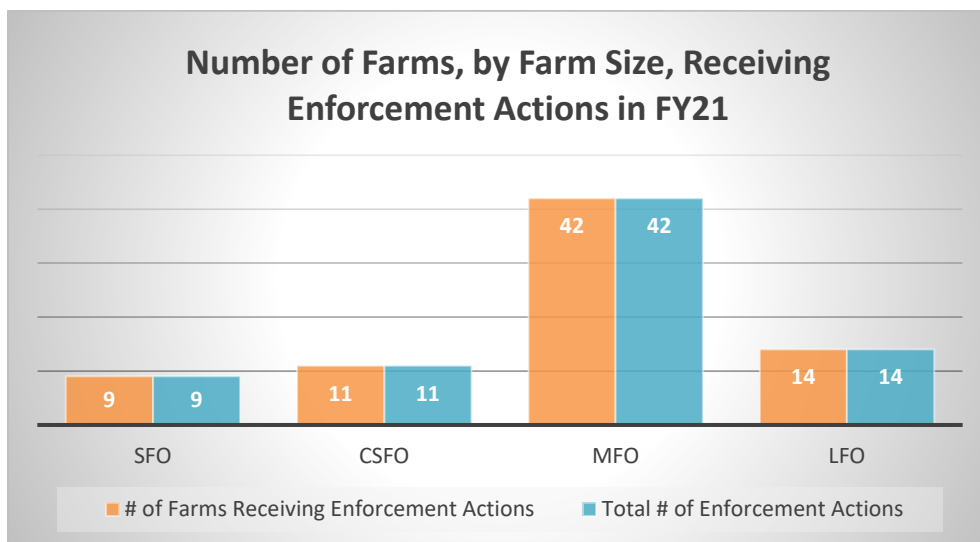
- Remain in close communication with WQ Division leadership and staff throughout the enforcement process to ensure timely follow-up inspections to monitor a farm’s progress in achieving compliance with the agricultural water quality regulations.
- Accompany WQ Division staff on field visits to better understand the issues requiring enforcement and to explain the enforcement process to the regulated community.
- Communicate regularly with the Vermont Agency of Natural Resources (ANR) to refer cases that involve suspected point source discharges of agricultural waste to waters of the State as required by Paragraph 6 of the Memorandum of Understanding between VAAF and ANR ([https://agriculture.vermont.gov/sites/agriculture/files/documents/Water\\_Quality/MOU\\_AAFM-ANR\\_AgriculturalWaterQualityPrograms\\_2017.pdf](https://agriculture.vermont.gov/sites/agriculture/files/documents/Water_Quality/MOU_AAFM-ANR_AgriculturalWaterQualityPrograms_2017.pdf)).
- Communicate regularly with the AGO on cases that VAAF has referred to the AGO for review and potential enforcement in order to monitor case progress, and provide subject matter expertise and in-field follow-up when needed to support AGO enforcement efforts.

Information about the WQ Division Enforcement Program, the RAPs, the MFO Program, and the LFO Program can be found at the following links:

- WQ Division Enforcement - <https://agriculture.vermont.gov/water-quality/enforcement-compliance>
- RAPs - <https://agriculture.vermont.gov/rap>
- MFO Permitting Program - <https://agriculture.vermont.gov/mfo>
- LFO Permitting Program - <https://agriculture.vermont.gov/lfo>

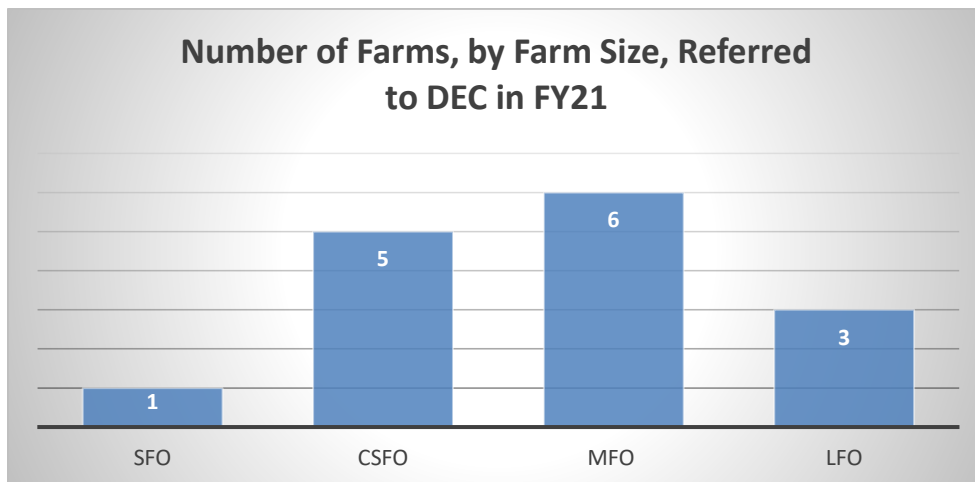
**In FY21, 76 farms received a total of 76 enforcement actions for alleged violations of Vermont’s water quality regulations.** 15 farms were referred to the Vermont Agency of Natural Resources, Department of Environmental Conservation (DEC)<sup>1</sup> for suspected direct discharges of agricultural waste to surface water.

**Figure 1.**



<sup>1</sup> Under a MOU with ANR, cases involving suspected point source discharges of waste to water are referred to DEC for investigation.

**Figure 2.**



**SFO COMPLIANCE REPORT**

Pursuant to the RAPs, a SFO is an operation that has between five and 49 mature dairy cows.<sup>2</sup> SFOs are subject to regulation under the RAPs but are not required to self-certify compliance with the RAPs.

**RAP Compliance:** In FY21, nine SFOs received a total of nine enforcement actions for alleged violations of the RAPs. Specifically, as a result of inspections/investigations conducted in FY21 by Water Quality Division staff, three SFOs received three enforcement actions. An additional five SFOs received five enforcement actions based on inspections/investigations conducted during FY20, and one SFO received one enforcement action based on inspections/investigations conducted in FY19. One SFO was referred to DEC for a suspected point source discharge of agricultural waste to surface water. This information is reported in Table 1 below.

**Table 1 – SFO Enforcement Actions**

Enforcement Actions	Number of FY21 Cases	Number of FY20Cases	Number of FY19 Cases
§ 4991(7) Letter	0	0	0
Corrective Action Letter (CAL)	3	5	1
Cease and Desist Order (CDO)	0	0	0
Emergency Administrative Order (EAO)	0	0	0
Notice of Violation with Administrative Penalty (NOV)	0	0	0
▪ Assurance of Discontinuance (AOD)	0	0	0
▪ Final Order (FO)	0	0	0
<b>SFO Referrals</b>			
Department of Environmental Conservation (DEC) <sup>3</sup>	1	0	0
Attorney General’s Office (AGO)	0	0	0

<sup>2</sup> There are numeric thresholds to define other animal and agricultural types such as vegetable crops and diversified farms in the SFO category. For more information, please refer to RAP Section 3.

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

**CSFO COMPLIANCE REPORT**

Pursuant to the RAPs, a CSFO is an operation that has between 50 and 199 mature dairy cows.<sup>4</sup> CSFOs are required to self-certify compliance with the RAPs annually and must be inspected by the Agency at least once every seven years for compliance with the RAPs.

**RAP Compliance:** In FY21, 11 CSFOs received a total of 11 enforcement actions for alleged violations of the RAPs. Specifically, as a result of inspections/investigations conducted in FY20 by Water Quality Division staff, ten CSFOs received ten enforcement actions. One additional farm received one enforcement action based on an inspection/investigation conducted during FY19. Five CSFOs were referred to DEC for suspected point source discharges of agricultural waste to surface water. This information is reported in Table 2 below.

**Table 2 – CSFO Enforcement Actions**

Enforcement Actions	Number of FY21 Cases	Number of FY20 Cases	Number of FY19 Cases
§ 4991(7) Letter	0	0	0
Corrective Action Letter (CAL)	0	10	0
Cease and Desist Order (CDO)	0	0	0
Emergency Administrative Order (EAO)	0	0	0
Notice of Violation with Administrative Penalty (NOV)	0	0	0
▪ Assurance of Discontinuance (AOD)	0	0	1
▪ Final Order (FO)	0	0	0
<b>SFO Referrals</b>			
Department of Environmental Conservation (DEC) <sup>5</sup>	4	1	0
Attorney General’s Office (AGO)	0	0	0

**MFO COMPLIANCE REPORT**

Pursuant to the RAPs, a MFO is an operation that has between 200 and 699 mature dairy cows.<sup>6</sup> MFOs are subject to regulation under the RAPs, the MFO Rule, and a MFO GP, and must be inspected by the Agency at least once every three years for compliance with the Rule and Permit.

**MFO Compliance:** In FY21, 42 MFOs received a total of 42 enforcement actions for alleged violations of the MFO GP, the MFO Rule, and/or the RAPs. Specifically, as a result of inspections/investigations conducted in FY21 by Water Quality Division staff, 25 MFOs received 25 enforcement actions for violations of the MFO GP, the MFO Rule, and/or the RAPs. An additional 14 farms received 14 enforcement actions based on inspections/investigations conducted during FY20, two farms received two enforcement actions based on inspections/investigations conducted in FY19, and one farm received one enforcement action based on an inspection/investigation conducted during calendar year 2017. Six MFOs were referred to DEC for suspected point source discharges of agricultural waste to surface water. This information is reported in Table 3 below.

<sup>4</sup> There are numeric thresholds to define other animal and agricultural types such as vegetable crops and diversified farms in the CSFO category. For more information, please refer to RAP Section 4.

<sup>5</sup> Under a MOU with ANR, cases involving suspected point source discharges of waste to water are referred to DEC for investigation.

<sup>6</sup> There are numeric thresholds to define other animal and agricultural types and diversified farms in the MFO category. For more information, please refer to 6 V.S.A. § 4858. The defined numeric thresholds are all aligned with federal definitions for Concentrated Animal Feeding Operations (CAFO) pursuant to the MOU with DEC.

**Table 3 – MFO Enforcement Actions**

Enforcement Actions	Number of FY21 Cases	Number of FY20 Cases	Number of FY19 Cases	Number of 2017 Cases
6 V.S.A. Section §4991(7) Letter	5	1	0	1
Corrective Action Letter (CAL)	19	12	0	0
Cease and Desist Order (CDO)	0	0	0	0
Emergency Administrative Order (EAO)	0	0	0	0
Notice of Violation with Administrative Penalty (NOV)	1	1	0	0
▪ Assurance of Discontinuance (AOD)	0	0	2	0
▪ Final Order (FO)	0	0	0	0
<b>MFO Referrals</b>				
Department of Environmental Conservation (DEC) <sup>7</sup>	5	1	0	0
Attorney General’s Office (AGO)	0	0	0	0

**LFO COMPLIANCE REPORT**

Pursuant to the RAPs, a LFO is an operation that has at least 700 mature dairy cows.<sup>8</sup> LFOs are subject to regulation under the RAPs, the LFO Rule, and a LFO IP, and must be inspected by the Agency at least once every year for compliance with the Rule and the Farm’s LFO Permit.

**LFO Compliance:** In FY21, 14 LFOs received a total of 14 enforcement actions for violations of their LFO IP, the LFO Rules, and/or the RAPs. Specifically, as a result of inspections/investigations conducted by Water Quality Division staff in FY21, nine LFOs received nine enforcement actions for violations of their LFO IP, the LFO Rule, and/or the RAPs. An additional four LFOs received four enforcement actions based on inspections/investigations conducted during FY20, and one LFO received one enforcement action based on inspections/investigations conducted during FY19. Three LFOs were referred to DEC for suspected point source discharges of waste to surface water. These are reported in Table 4 below.

**Table 4 – LFO Enforcement Actions**

Enforcement Actions	Number of FY21 Cases	Number of FY20 Cases	Number of FY19 Cases
6 V.S.A. Section §4991(7) Letter	1	0	0
Corrective Action Letter (CAL)	8	4	0
Cease and Desist Order (CDO)	0	0	0
Emergency Administrative Order (EAO)	0	0	0
Notice of Violation with Administrative Penalty (NOV)	0	0	1
▪ Assurance of Discontinuance (AOD)	0	0	0
▪ Final Order (FO)	0	0	0
<b>LFO Referrals</b>			
Department of Environmental Conservation (DEC) <sup>9</sup>	3	0	0
Attorney General’s Office (AGO)	0	0	0

<sup>7</sup>Under a MOU with ANR, cases involving suspected point source discharges of waste to water are referred to DEC for investigation.

<sup>8</sup> There are numeric thresholds to define other animal and agricultural types and diversified farms in the LFO category. For more information, please refer to 6 V.S.A. § 4851. The defined numeric thresholds are all aligned with federal definitions for Concentrated Animal Feeding Operations (CAFO) pursuant to the MOU with DEC.

<sup>9</sup> Under a MOU with ANR, cases involving suspected point source discharges of waste to water are referred to DEC for investigation.

**Table 5. Number of FY21 Enforcement Actions and Referrals Summarized by Tactical Basin**

Basin	Number of Enforcement Action	Referrals
Battenkill-Walloomsac-Hoosic	4	0
Southern Lake Champlain	10	DEC - 1
Otter Creek-Little Otter Creek-Lewis Creek	20	DEC - 1
Northern Lake Champlain	5	DEC - 1
Missisquoi	23	DEC - 3
Lamoille	3	DEC - 1
Winooski	1	0
White	4	DEC - 1
Ottawaquechee-Black-CT Direct	0	0
West-Williams-Saxtons-CT Direct	0	0
Deerfield-CT Direct	0	0
Stevens-Wells-Waits-Ompompanoosuc-CT Direct	1	DEC - 1
Passumpsic	0	DEC - 1
Upper Connecticut	3	0
Lake Memphremagog	2	DEC - 5

**Table 6. Enforcement Actions Issued in FY21 by General Nature of Violation of RAP Regulations, MFO GP, MFO Rule, LFO IP, and LFO Rules.<sup>10</sup>**

General Nature of Violation	Actual Number of Individual Counts/Violations <sup>11</sup>	Enforcement Actions Issued
<b>SFO Compliance</b>		
Field Practices	5	CAL – 5
Productions Area	10	CAL – 5
Recordkeeping / NMP	0	0
Permitting	0	0
<b>CSFO Compliance</b>		
Field Practices	7	CAL – 6
Production Area	11	CAL – 3
Recordkeeping / NMP	4	CAL – 3
Permitting	0	0

<sup>10</sup> Assurances of Discontinuance (AODs) and § 4991(7) letters are not included in this table. While they are enforcement actions, they are not charging documents with specific counts.

<sup>11</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 76 enforcement actions issued to farms in FY21. 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.

<b>MFO Permit Compliance</b>		
Annual Fee Payment / Reporting	0	0
Field Practices	11	CAL - 10
Production Area	49	CAL – 24; NOV - 1
Recordkeeping/NMP	19	CAL – 13; NOV - 1
Permitting	0	0
<b>LFO Permit Compliance</b>		
Annual Fee Payment / Reporting	0	0
Field Practices	11	CAL - 6
Production Area	23	CAL – 8; NOV - 1
Recordkeeping / NMP	6	CAL - 5
Permitting	3	CAL - 2
<b>Custom Manure Applicator</b>		
Field Practices	0	0
Recordkeeping	0	0

**TREND ANALYSIS OF ENFORCEMENT EFFORTS**

**Figure 3. Water Quality Enforcement Efforts from 2012 through FY21.** This figure depicts the total number of farms receiving enforcement actions over the past ten years.



This graph shows a reduction in the number of farms receiving enforcement actions in FY21. Annual Enforcement Reports from previous years have reported on LFOs receiving enforcement actions for failing to pay their Annual LFO Operating Fee and MFOs receiving enforcement actions for either failing to pay their Annual MFO Operating Fee or failing to submit their Annual MFO Compliance Report, Notice of Intent to Comply (NOIC), P-index, and/or GIS shapefiles. In FY21, all LFOs and MFOs paid their Annual Operating Fees. In addition, while a number of MFOs failed to submit their Annual MFO Compliance Report, P-index, and/or GIS shapefiles, no enforcement actions were issued to

MFOs for these violations in FY21 due to the COVID-19 Pandemic. When these “Fee/Reporting” types of enforcement actions are subtracted from the total number of farms receiving enforcement actions in 2017, FY18, FY19, and FY20, we find that, on average, 62 farms per year received enforcement actions that were issued specifically for water quality-related violations. Therefore, the 76 farms receiving water quality-related enforcement actions in FY21 exceeds the average number of farms receiving water quality-related enforcement actions over the past four reporting years.

## **Glossary of Enforcement Actions Pursuant to 6 V.S.A. Chapter 215**

**§ 4991(7) Letter** – A § 4991(7) Letter is used to request a consultation meeting with a farm to discuss farm operations and identify issues that may need to be addressed through improved farming practices or installation of conservation practices.

**Assurance of Discontinuance (AOD)** – An AOD is an agreement, entered into between VAAFM and a farm, as an alternative to pursuing further administrative or judicial proceedings regarding an alleged violation(s). The AOD typically lays out a schedule of compliance, which may include the payment of penalties, that the farm must follow to regain compliance with VAAFM’s water quality regulations.

**Corrective Action Letter (CAL)** – A CAL serves as a written warning to put a Farm on notice that they have allegedly violated VAAFM’s water quality regulations. A CAL requires the Farm to respond, in writing, within 30 days with a plan and timeline for the implementation of actions to correct the alleged violations.

**Cease and Desist Order (CDO)** – A CDO requires the immediate cessation of an alleged violation. Recipients of a CDO have five days to request a hearing on the violations alleged in the CDO.

**Emergency Administrative Order (EAO)** – An EAO is issued when an alleged violation presents an immediate threat of substantial harm to the environment or immediate threat to public health or welfare. Recipients of an EAO have five days to request a hearing on the violations alleged in the EAO.

**Final Order (FO)** - If a Farm fails to request a hearing or respond to a NOV, a FO may be issued which imposes the proposed administrative penalty. Recipients of a FO may appeal within 30 days of the decision to the Superior Court.

**Hearing / Pre-hearing Settlement Conference** - When requested, hearings shall be conducted pursuant to 3 V.S.A. Chapter 25. VAAFM typically offers to hold a pre-hearing settlement conference (pre-hearing) to see if an agreement on the alleged violations and proposed penalties can be reached. If an agreement is reached at pre-hearing, it is memorialized in an AOD. If agreement is not reached at pre-hearing, then the case will progress to a formal hearing with a hearing officer.

**Mandatory Corrective Action Order (MCAO)** – A MCAO is issued to impose a specific date by which a corrective action needs to be implemented. Recipients of a MCAO have 15 days to request a hearing on the violations alleged in the MCAO.

**Notice of Violation (NOV)** – A NOV proposes an administrative penalty for an alleged violation of VAAFM’s water quality regulations. Recipients of a NOV have 15 days to request a hearing on the violations alleged in the NOV.

**Questions regarding the Vermont Agricultural Water Quality Enforcement Program or this report in general can be directed to VAAFM Enforcement Section: (802) 461-7160 or [David.Huber@vermont.gov](mailto:David.Huber@vermont.gov)**



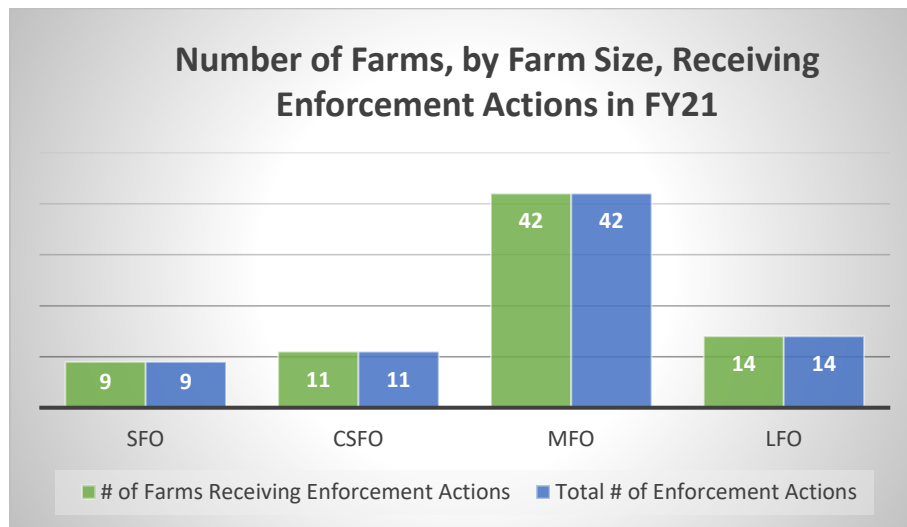
**Vermont Agency of Agriculture, Food and Markets  
Administration Division  
Enforcement Section**

**Agricultural Non-Point Source Water Quality Enforcement Program  
State Fiscal Year 2021 Annual Report – Appendix**

This Appendix is a companion piece to the State Fiscal Year 2021 (FY21) Agricultural Water Quality Enforcement Program Report and is intended to provide a graphic representation of the enforcement efforts undertaken by the Agency of Agriculture, Food and Markets’ (the Agency) Administration Division’s Enforcement Section (Enforcement Section) during FY21 for violations of Vermont’s Agricultural Water Quality Regulations. Please consult the FY21 Report if you are interested in reviewing the actual data on which these graphics are based. You can obtain a copy of the report by contacting the Agency at (802) 461-7160, or by visiting the Agency’s website at: <https://agriculture.vermont.gov/water-quality/enforcement-compliance>.

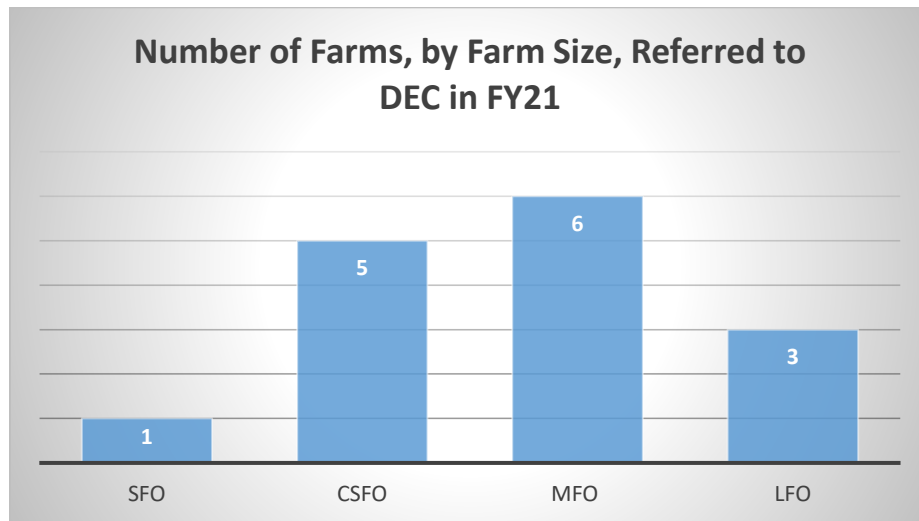
**In FY21, 76 farms received a total of 76 enforcement actions.** 15 farms were referred to the Vermont Agency of Natural Resources, Department of Environmental Conservation (DEC)<sup>1</sup> for suspected direct discharges of agricultural wastes to surface water.

**Figure 1.**



<sup>1</sup> Under a MOU with ANR, cases involving suspected point source discharges of waste to water are referred to DEC for investigation.

Figure 2.



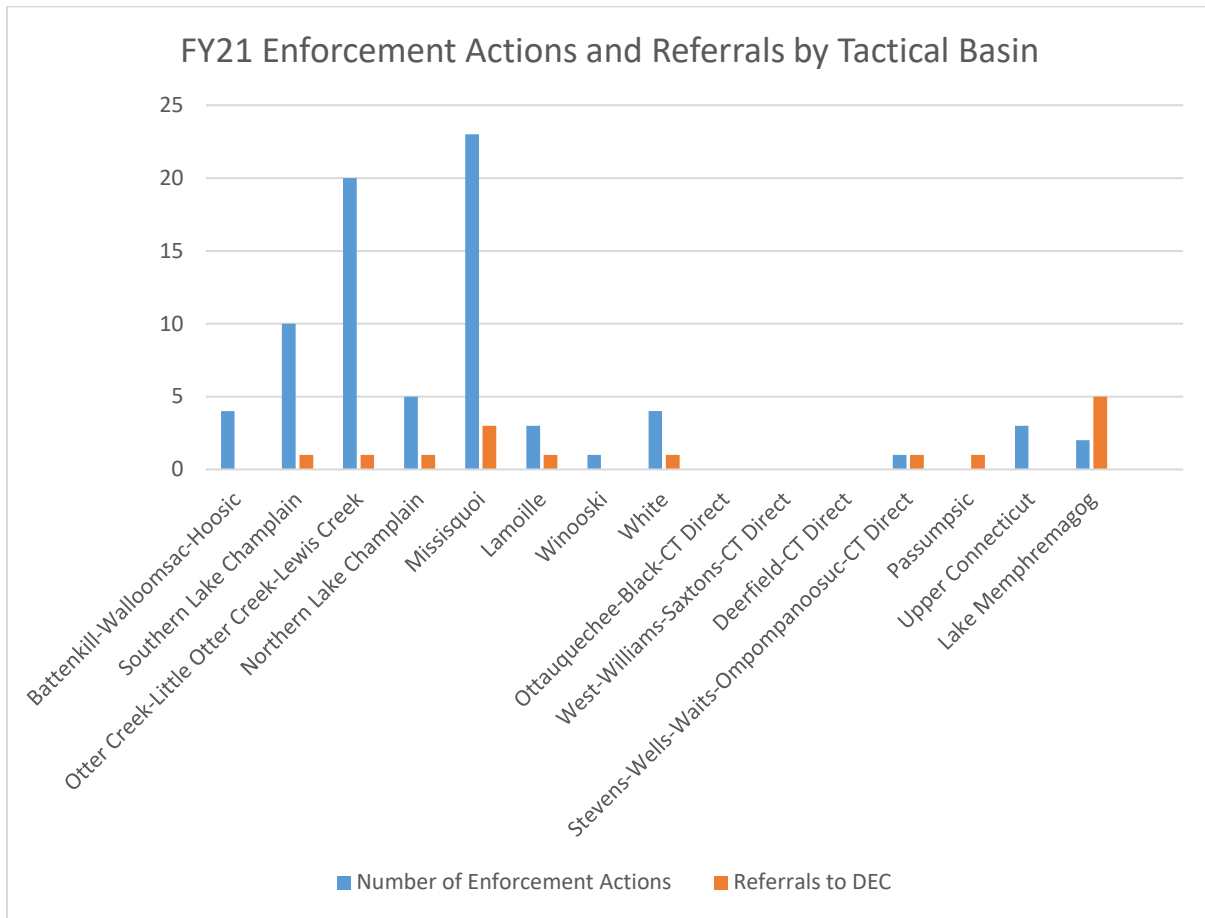
**Required Agricultural Practices Rule (RAP) Compliance – Small Farm Operations (SFOs):** Pursuant to the RAPs, a SFO is an operation that has between five and 49 mature dairy cows. SFOs are subject to regulation under the RAPs but are not required to self-certify compliance with the RAPs. **In FY21, nine SFOs received a total of nine enforcement actions for violations of the RAPs, and one SFO was referred to DEC for a suspected point source discharge of agricultural waste to surface water.**

**RAP Compliance – Certified Small Farm Operations (CSFOs):** Pursuant to the RAPs, a CSFO is an operation that has between 50 and 199 mature dairy cows. CSFOs are required to self-certify compliance with the RAPs by submitting a Certification Form to the Agency annually and must be inspected by the Agency at least once every seven years for compliance with the RAPs. **In FY21, 11 CSFOs received a total of 11 enforcement actions for violations of the RAPs, and five CSFOs were referred to DEC for suspected point source discharges of agricultural waste to surface water.**

**Medium Farm Operation General Permit (MFO GP) Compliance:** Pursuant to the RAPs, a MFO is an operation that has between 200 and 699 mature dairy cows. MFOs are subject to regulation under the RAPs, the MFO Rule, and Vermont’s MFO GP and must be inspected by the Agency at least once every three years for compliance with the Rule and Permit. **In FY21, 42 MFOs received a total of 42 enforcement actions for violations of the MFO GP and/or the RAPs, and six MFOs were referred to DEC for suspected point source discharges of agricultural waste to surface water.**

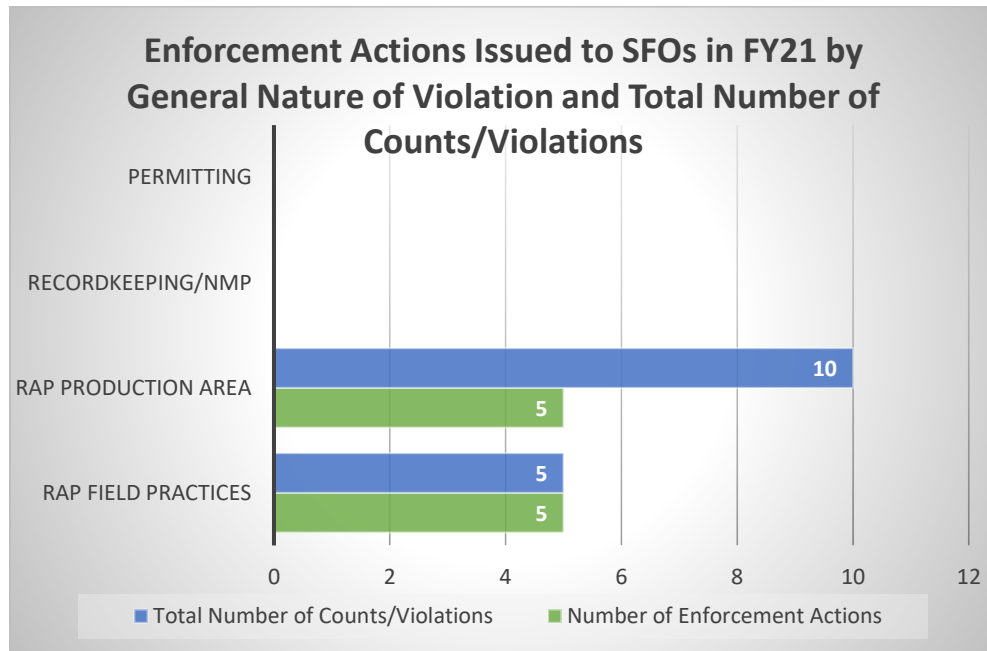
**Large Farm Operation Individual Permit (LFO IP) Compliance:** Pursuant to the RAPs, a LFO is an operation that has at least 700 mature dairy cows. LFOs are subject to regulation under the RAPs, the LFO Rule, and an LFO IP, and must be inspected by the Agency at least once every year for compliance with the Rules and the Farm’s LFO IP. **In FY21, 14 LFOs received a total of 14 enforcement actions for violations of their LFO IP, the LFO Rule, and/or the RAPs, and three LFOs were referred to DEC for suspected direct discharges of agricultural waste to surface water.**

**Figure 3. FY21 Enforcement Actions and Referrals by Tactical Basin:** This graphic is a companion piece to Table 5 in the FY21 Annual Report and summarizes, by Tactical Basin, the number of enforcement actions issued, and the number of cases referred to DEC for suspected direct discharges of agricultural waste to surface water.

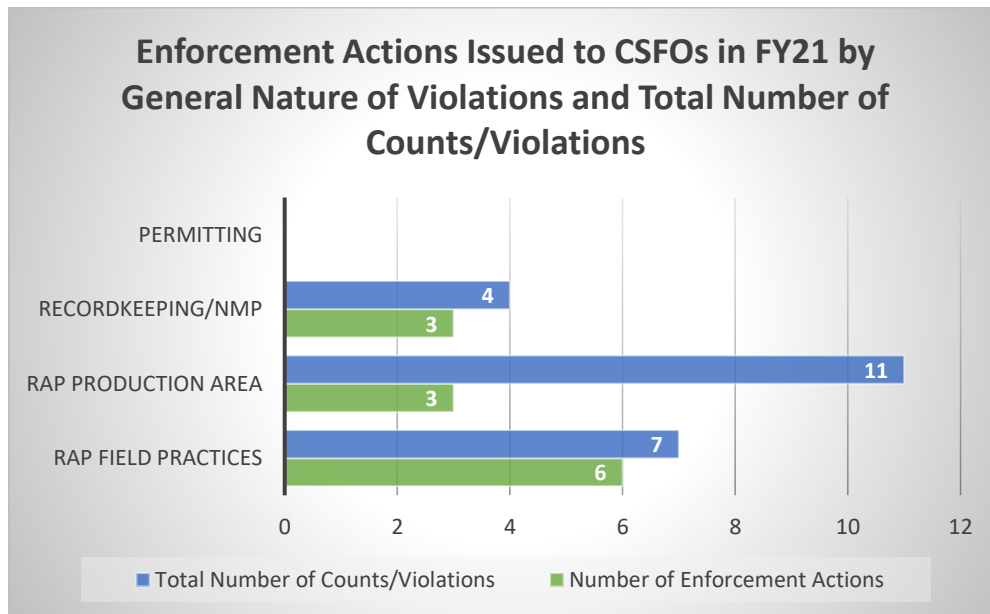


**Figures 4a, 4b, 4c, and 4d. Enforcement Actions Issued to SFOs, CSFOs, MFOs, and LFOs in FY21 by General Nature of Violation and Total Number of Counts/Violations:** These graphics comprise a companion piece to Table 6 in the FY21 Report and summarize enforcement actions issued to farm operations by general nature of violation of the RAPs, MFO GP, LFO Rule, and/or LFO IP, and actual number of individual counts. An enforcement action may include more than one count/violation of the RAPs, MFO GP, LFO Rule and/or LFO IP, so the number of counts/violations may exceed the total number of enforcement actions issued. In addition, the total number of enforcement actions enumerated in Tables 4a, 4b, 4c, and 4d exceeds the 76 enforcement actions issued to farms in FY21. 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.

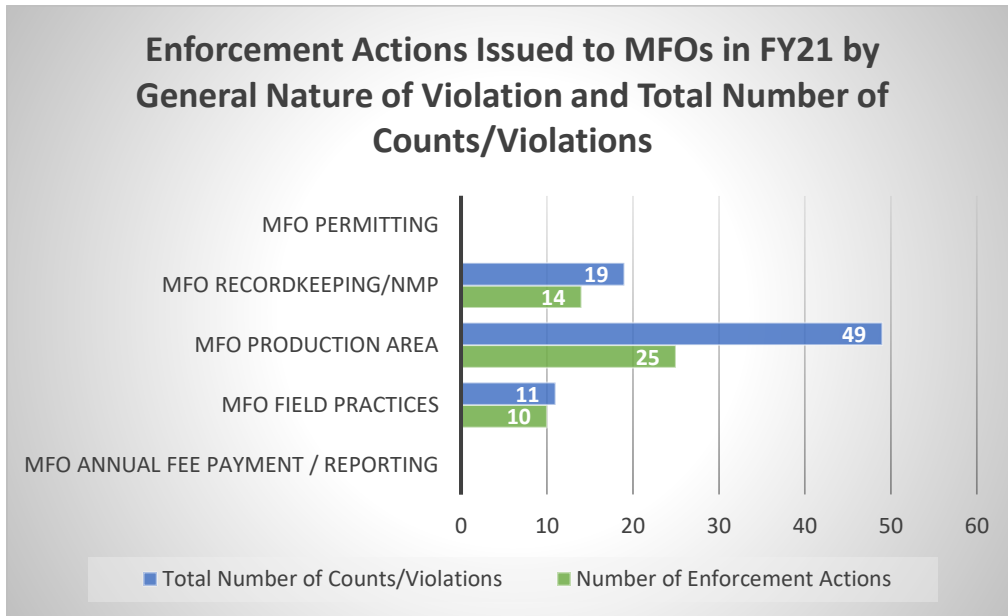
**Figure 4a.**



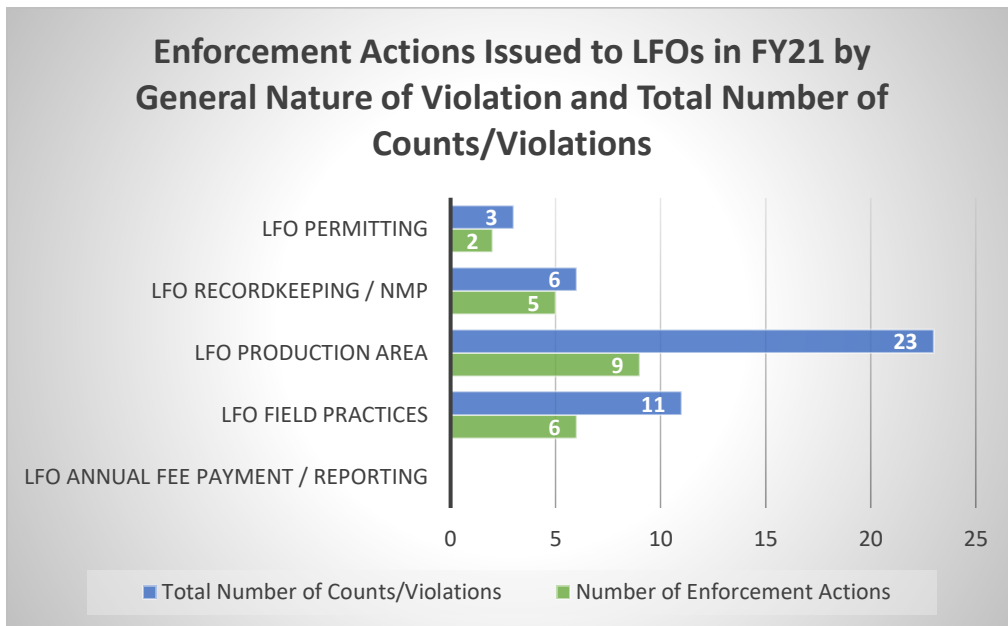
**Figure 4b.**



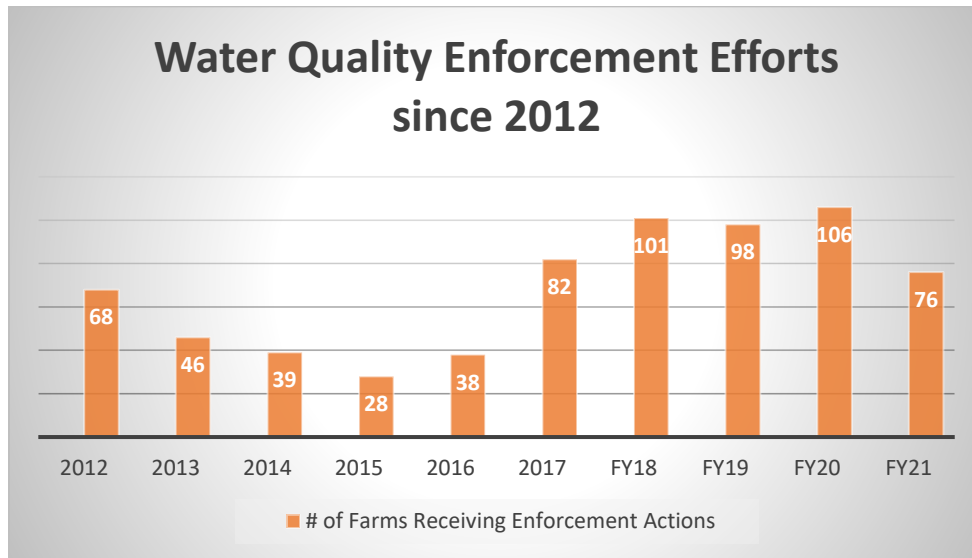
**Figure 4c.**



**Figure 4d.**



**Figure 5. Trend analysis of the Agency’s agricultural water quality enforcement efforts over a ten-year period, or since 2012. Please note that in 2018, the Agency started reporting enforcement efforts on a State Fiscal Year (FY) basis.**



This graph shows a reduction in the number of farms receiving enforcement actions in FY21. Annual Enforcement Reports from previous years have reported on LFOs receiving enforcement actions for failing to pay their Annual LFO Operating Fee and MFOs receiving enforcement actions for either failing to pay their Annual MFO Operating Fee or failing to submit their Annual MFO Compliance Report, Notice of Intent to Comply (NOIC), P-index, and/or GIS shape files. In FY21, all LFOs and MFOs paid their Annual Operating Fees. In addition, while a number of MFOs failed to submit their Annual MFO Compliance Report, P-index, and/or GIS shape files, no enforcement actions were issued to MFOs for these violations in FY21 due to the COVID-19 Pandemic. When these “Fee/Reporting” types of enforcement actions are subtracted from the total number of farms receiving enforcement actions in 2017, FY18, FY19, and FY20, we find that, on average, 62 farms per year received enforcement actions that were issued specifically for water quality-related violations. Therefore, the 76 farms receiving water quality-related enforcement actions in FY21 exceeds the average number of farms receiving water quality-related enforcement actions over the past four reporting years.