

RECOMMENDATION	TYPE OF CHANGE	ACTIONS	DATE
<i>Standardized fines improvements</i>			
Create and implement regs to use limited fines to resolve minor violations [#16]	Review of existing regulation (§ 11386)	Procedural changes to maximize efficiency of § 11386 standardized fine process	February 2020
Develop guidance on violations that can be resolved through fines [#3 – partial]	Review of existing regulation (§ 11386)	No action necessary	Addressed by existing regulation section 11386
Create regulations that define substantial harm [#15]	Amendment of regulation (§ 11386)	Enforcement Committee approval of new language; commence rulemaking process	Oct 2019 – Enforcement Committee approved language; 2020 – Commence rulemaking process
Update database to include when standardized fines process initiated [#13 – partial]	Procedural change	Include information within existing geospatial enforcement case tracking database	Early 2020 –Include 35-day notice information in database for all cases
<i>Prioritizing caseload</i>			
Develop guidance to enumerate violation types worthy of swift action [#3]	Procedural change	Evaluate existing prioritization system and determine whether changes are needed	No action presently required; 2020 – re-evaluate need for prioritization system changes
Simplify system for prioritizing cases [#4]	Procedural change	Evaluate existing prioritization system and determine whether changes are needed	No action presently required; 2020 – re-evaluate need for prioritization system changes

<i>Case milestones and timeframes to move cases</i>			
Develop procedure to identify stale cases and seek appropriate settlements [#6]	Procedural change	Review oldest cases and seek resolution	August 2019 – Enforcement Committee update on oldest cases Mid-2020 – target for closing all of the oldest identified cases
Create and implement regulations to identify milestones and timeframes for enforcement [#14]	Procedural change	Develop case management plans to ensure that cases are resolved within established timeframes	February 2020 – finalize case management plan procedure
<i>Delineating violations</i>			
Provide criteria for calculating the number of violations present in an enforcement action [#15]	Procedural change	Develop guidance to delineate violations in cases involving multiple unauthorized actions	February 2020 – finalize guidance
<i>Compliance improvements and proactive enforcement efforts</i>			
Develop and implement procedures for proactive enforcement [#1 – partial]	Procedural change	Develop template contact letters for cases to alert violators and elicit response; develop compliance program	Mid-2020 – regularize contact letters; Compliance program is budget issue
Implement a permit compliance position to support the efforts of enforcement staff [#12]	Resource augmentation		Budget issue
<i>Penalty Policy</i>			
Create a penalty calculation worksheet and policies, procedures and criteria for application [#5]	New policy	Create a penalty policy	February 2020 – Finalize penalty policy

<i>Enhance staff and resources</i>			
If necessary, seek additional funding for the permit compliance position [#12]	Resource augmentation		Budget issue
Conduct a workforce study of permit and regulatory activities and determine whether additional staff is required [#11]	Resource augmentation	Workforce study must be conducted by independent body	Budget issue
Update the existing database or create a new database [#13]	Resource augmentation		Budget issue
<i>Miscellaneous</i>			
Evaluate and update permit fees every five years [#7]	Regulation change		Commission approved October 2019
Conduct a review of local agency compliance with the marsh plan [#9]	Holistic approach (legislation/regulation/process)		Staff commenced September 2019
Create a policy identifying the minimum amounts from the Bay Fill Cleanup and Abatement Fund that BCDC will disburse and prioritize projects that will be supported through disbursements [#10]			Budget issue
Appoint a new citizens' advisory committee [#9]	Procedural change	Commission decision not to appoint	January 2019
Update regulations on minor permit issuance [#17]	Regulatory change	Not pursuing at this time but will explore as appropriate	2021 – Will examine along with other changes to the permitting regulations