



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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## Central Valley Regional Water Quality Control Board

25 January 2016

Jim & Vera Kurnosoff  
17223 W Kearney Blvd  
Kerman, California 93630  
s10tahoe87@yahoo.com

**CERTIFIED MAIL**  
**7015 1730 0000 9939 8820**

### ***ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-0513, JIM & VERA KURNOSOFF, AS INDIVIDUALS AND IN THEIR REPRESENTATIVE CAPACITY AS TRUSTEES FOR THE J & V REVOCABLE TRUST***

Enclosed is an Administrative Civil Liability Complaint (“Complaint”), issued pursuant to California Water Code section 13323. This Complaint alleges that Jim & Vera Kurnosoff, as individuals and in their representative capacity as trustees for the J & V Revocable Trust (hereafter collectively “Dischargers”), failed to submit a Report of Waste Discharge (“RoWD”) for coverage under the Irrigated Lands Regulatory Program as required under Water Code section 13260, and recommends an administrative civil liability pursuant to Water Code section 13261 in the amount of **twenty seven thousand eight hundred eighty five dollars (\$27,885)**.

In accordance with the enclosed Waiver Form, the Dischargers may waive the 90-day hearing requirement in order to pay the full proposed civil liability amount, engage in settlement discussions, or extend the hearing date and/or hearing deadlines by checking the appropriate box on the Waiver Form and signing and returning it by 16 February 2016.

If the Central Valley Regional Water Quality Control Board (“Central Valley Water Board”) does not receive a signed waiver by 16 February 2016, a hearing will be scheduled for the **21/22 April 2016** Board meeting in Fresno. This hearing will be governed by the attached Hearing Procedure. Any objections to the Hearing Procedure must be received by Patrick Pulupa, whose contact information is listed in the Hearing Procedure, by **5:00 p.m. on 3 February 2016**.

If you choose to sign the waiver and a settlement is reached, this will be considered a tentative settlement of the violations. If the Central Valley Water Board does not hold a hearing on the matter, and if the terms of the final settlement are not significantly different from those proposed in the enclosed Complaint, the settlement will be considered final pending a 30-day public comment period from the date the Complaint was issued. If the terms of the settlement are significantly different from the Complaint, the settlement will be considered final pending a 30-day public comment period, starting from the date the Stipulated Order is issued. Interested

parties may comment on the proposed action during this period by submitting written comments to the Central Valley Water Board staff person listed below. Should the Central Valley Water Board receive new information or comments during this comment period, the Assistant Executive Officer may withdraw the Stipulated Order, return payment, and issue a new complaint.

In order to conserve resources, this letter transmits paper copies of the documents to Dischargers only. Interested persons may download the documents from the Central Valley Water Board's Internet website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/tentative\\_orders/](http://www.waterboards.ca.gov/centralvalley/board_decisions/tentative_orders/).

Copies of these documents can also be obtained by contacting or visiting the Central Valley Water Board's Fresno office weekdays between 8:00 a.m. and 5:00 p.m.

If you have any questions or comments regarding the Administrative Civil Liability Complaint, please contact David Sholes at (559) 445-6279, or via e-mail at [David.Sholes@waterboards.ca.gov](mailto:David.Sholes@waterboards.ca.gov).

*Original signed by:*

CLAY L. RODGERS  
Assistant Executive Officer

Enclosures: ACL Complaint R5-2016-0513

cc via email: Pamela Creedon, Central Valley Water Board, Rancho Cordova  
Adam Laputz, Central Valley Water Board, Rancho Cordova  
Rob L'Heureux, Central Valley Water Board, Rancho Cordova  
Kailyn Ellison, Office of Enforcement, SWRCB, Sacramento  
Patrick Pulupa, Office of Chief Counsel, SWRCB, Sacramento  
Casey Creamer, Kings River Water Quality Coalition