
Central Valley Regional Water Quality Control Board

1 September 2016

Brooks & Arlene Rushing,
Trustee of the Brooks J & Arlene J Rushing Trust
2030 N Washington Rd
Turlock, CA 95380

ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-0546, BROOKS AND ARLENE RUSHING, AS INDIVIDUALS AND IN THEIR REPRESENTATIVE CAPACITY AS TRUSTEES FOR THE BROOKS J AND ARLENE J RUSHING TRUST – PROSECUTION TEAMS TRANSMITTAL OF EVIDENCE

Pursuant to the Hearing Procedure for the above referenced matter, please find enclosed Prosecution Team's Legal and Technical Analysis, the a list of witnesses the Prosecution Team intends to call at the hearing and a list of evidence with attached exhibits. The Evidence List consists of documents already in the public files of the Central Valley Regional Water Quality Control Board, some of which are being submitted by reference in accordance with the California Code of Regulations, title 23, section 648.3.

The Prosecution Team has added Terry Bechtel and Wesley Ouimette to the Prosecution Team and witness list to provide additional testimony regarding information about the facility, landowner outreach, and the penalty methodology.

If you have any questions regarding the enclosures, please contact Brett Stevens at (916) 464-4642, or via e-mail at brett.stevens@waterboards.ca.gov.

Original signed by

SUE Y. MCCONNELL
Irrigated Lands Program Manager

Enclosures: Prosecution Team's Legal & Technical Analysis
Prosecution Team Witness List
Prosecution Team Evidence List & Exhibits

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
Andrew Deeringer, Office of Chief Counsel, SWRCB, Sacramento
Parry Klassen, East San Joaquin Water Quality Coalition