

## Central Valley Regional Water Quality Control Board

8 September 2016

### VIA OVERNIGHT MAIL

Emma J. Bounds  
Bounds Family Trust  
19621 SE 72<sup>nd</sup> Street  
Oklahoma City, OK 74857

### VIA OVERNIGHT MAIL

Monte Bounds  
Bounds Family Trust  
33318 Avenue 12  
Madera, CA 93636

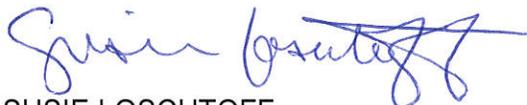
**SUBJECT: SUBMISSION OF DECLARATION RE ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-0541 FOR EMMA J. BOUNDS, AS AN INDIVIDUAL AND AS TRUSTEE FOR THE BOUNDS FAMILY TRUST**

Pursuant to the Prosecution Team's request for an extension until 9 September 2016 to submit a Declaration from a member of the East San Joaquin Water Quality Coalition, please find enclosed a Declaration from Parry Klassen, the Executive Director of the East San Joaquin Water Quality Coalition.

The Prosecution Team is offering the Declaration to demonstrate the practices of the East San Joaquin Water Quality Coalition in relation to mailings related to Farm Evaluations and to authenticate the documents listed in the Declaration. In order to avoid unnecessary travel and expense, the Prosecution Team requests that Mr. Klassen not be required to appear as a witness at the hearing for this case unless there is an objection by the Discharger and a showing of a need for cross-examination.

If there are any questions, please contact me at (916) 327-0140 or via e-mail at [susan.loscutoff@waterboards.ca.gov](mailto:susan.loscutoff@waterboards.ca.gov).

Sincerely,



SUSIE LOSCUTOFF  
Attorney

Enclosure: Declaration of Parry Klassen

*(cc's on following page)*

cc: (Via Email Only):

**Advisory Team:**

Adam Laputz, Central Valley Water Board  
[Adam.Laputz@waterboards.ca.gov](mailto:Adam.Laputz@waterboards.ca.gov)

Andrew Deeringer, State Water Resources Control Board, Office of Chief Counsel  
[Andrew.Deeringer@waterboards.ca.gov](mailto:Andrew.Deeringer@waterboards.ca.gov)

**Prosecution Team:**

Andrew Altevogt, Central Valley Water Board  
[Andrew.Altevogt@waterboards.ca.gov](mailto:Andrew.Altevogt@waterboards.ca.gov)

Sue McConnell, Central Valley Water Board  
[Sue.McConnell@waterboards.ca.gov](mailto:Sue.McConnell@waterboards.ca.gov)

Brett Stevens, Central Valley Water Board  
[Brett.Stevens@waterboards.ca.gov](mailto:Brett.Stevens@waterboards.ca.gov)

**East San Joaquin Water Quality Coalition:**

Parry Klassen, East San Joaquin Water Quality Coalition  
[klassenparry@gmail.com](mailto:klassenparry@gmail.com)

Tess Dunham, Attorney for the East San Joaquin Water Quality Coalition  
[tdunham@somachlaw.com](mailto:tdunham@somachlaw.com)

1 SUSAN LOSCUTOFF, Attorney (SBN 284788)  
2 State Water Resources Control Board  
3 1001 I Street, 16<sup>th</sup> Floor  
4 Sacramento, California 95814  
5 Telephone: 916-327-0140  
6 Fax: 916-341-5896  
7 E-mail: susan.loscutoff@waterboards.ca.gov

8 Attorney for Regional Water Quality Control Board,  
9 Central Valley Region, Prosecution Team

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BEFORE THE CALIFORNIA WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

In the Matter of: )  
Emma J. Bounds, as an individual and as ) ACLC No. R5-2016-0541  
Trustee for the Bounds Family Trust )  
) DECLARATION OF PARRY KLASSEN  
)

---

I, Parry Klassen, declare as follows:

1. I am the Executive Director of the East San Joaquin Water Quality Coalition (Coalition) and have been in that position for the last twelve (12) years. In my position at the Coalition, I organize and facilitate meetings for the Board of Directors; review contracts and invoices for entitles performing work for the Coalition; prepare reports for the Central Valley Regional Water Board; attend and participate in Central Valley Regional Water Board meetings and committees related to the Irrigated Lands Regulatory Program; give presentations to various grower groups regarding the Coalition; prepare various media for the Coalition, including press releases and newsletters; organize and participate in Irrigated Lands Regulatory Program meetings for Coalition members; engage with other watershed coalitions to discuss issues related to Irrigated Lands Regulatory Program implementation; review mailings and coordinate with Coalition

1 consultants to ensure correct timing and mailing of member correspondence; and provide  
2 services requested by the Board of Directors to ensure efficient and effective operation of  
3 the Coalition.

4 2. I have personal knowledge of the Coalition's procedures for mailings and notices  
5 sent to members regarding the 2013, 2014, and 2015 Farm Evaluations.

6 3. Prosecution Team Exhibit 3 is a true and correct copy of the January 24, 2014  
7 notice the Coalition sent to members, including Bounds Family Trust, regarding due dates  
8 for the 2013 Farm Evaluation.

9 4. Prosecution Team Exhibit 4 is a true and correct copy of the February 2014  
10 newsletter sent by the Coalition to all of its members, including Bounds Family Trust.

11 5. Prosecution Team Exhibit 5 is a true and correct copy of the February 10, 2014  
12 notice regarding the 2013 Farm Evaluation sent by the Coalition to Bounds Family Trust.

13 6. Prosecution Team Exhibit 6 is a true and correct copy of the May 2014 postcard  
14 sent by the Coalition to members, including Bounds Family Trust, who failed to submit the  
15 2013 Farm Evaluation by the deadline.

16 7. Prosecution Team Exhibit 7 is a true and correct copy of the July 11, 2014 notice  
17 sent by the Coalition to Bounds Family Trust.

18 8. Prosecution Team Exhibit 8 is a true and correct copy of the December 22, 2014  
19 Coalition Participation Agreement between the Coalition and its members.

20 9. Prosecution Team Exhibit 9 is a true and correct copy of the January 12, 2015  
21 notice sent by the Coalition to members, including Bounds Family Trust, regarding the  
22 2014 Farm Evaluation.

23 10. Prosecution Team Exhibit 10 is a true and correct copy of the May 2015 postcard  
24 sent by the Coalition to members, including Bounds Family Trust, regarding due dates for  
25 the 2014 Farm Evaluation.  
26  
27  
28

1 11. Prosecution Team Exhibit 11 is a true and correct copy of the June 3, 2015 final  
2 notice sent by the Coalition to members, including Bounds Family Trust, who failed to  
3 submit the 2014 Farm Evaluation by the deadline.

4 12. Prosecution Team Exhibit 12 is a true and correct copy of the November 2015  
5 postcard sent by the Coalition to members, including Bounds Family Trust, who failed to  
6 submit the 2014 Farm Evaluation by the deadline.

7 13. Prosecution Team Exhibit 13 is a true and correct copy of Tab 1 of the December  
8 16, 2015 list provided by the Coalition to the Central Valley Water Board of members who  
9 failed to submit Farm Evaluations for 2013 and/or 2014.

10 14. Prosecution Team Exhibit 14 is a true and correct copy of the December 21, 2015  
11 notice sent by the Coalition to Bounds Family Trust.

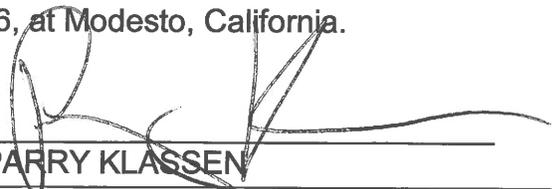
12 15. Prosecution Team Exhibit 15 is a true and correct copy of the March 2016 postcard  
13 sent by the Coalition to members, including Bounds Family Trust, who failed to submit the  
14 2015 Farm Evaluation by the deadline.

15 16. Prosecution Team Exhibit 16 is a true and correct copy of the April 19, 2016 list  
16 provided by the Coalition to the Central Valley Water Board of members who failed to  
17 submit Farm Evaluations for 2013, 2014, and/or 2015.

18 17. Prosecution Team Exhibit 17 is a true and correct copy of the May 2016 notice sent  
19 by the Coalition to members, including Bounds Family Trust, who failed to submit the  
20 2015 Farm Evaluation by the deadline.

21 18. As of 8 August 2016, Bounds Family Trust had not submitted the 2013, 2014, nor  
22 2015 Farm Evaluations to the Coalition.

23 Executed this 7 day of September, 2016, at Modesto, California.

24  
25  
26  
27  
28  
  
PARRY KLASSEN