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**Central Valley Regional Water Quality Control Board**

8 September 2016

**VIA OVERNIGHT MAIL**

Joe Silveira  
260 Air Park Rd  
Atwater, CA 95301

**SUBJECT: SUBMISSION OF DECLARATION RE ADMINISTRATIVE CIVIL LIABILITY  
COMPLAINT R5-2016-0547 FOR JOE SILVEIRA**

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) 445-9557 or via e-mail at [kailyn.ellison@waterboards.ca.gov](mailto:kailyn.ellison@waterboards.ca.gov).

Sincerely,



KAILYN ELLISON  
Attorney for the Prosecution Team

Enclosure: Declaration of Parry Klassen

*(cc's on following page)*

cc: (Via Email Only):

**Advisory Team:**

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**East San Joaquin Water Quality Coalition:**

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

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BEFORE THE CALIFORNIA WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

In the Matter of: )  
Joe Silveira ) ACLC No. R5-2016-0547  
)  
) DECLARATION OF PARRY KLASSEN  
)

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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 Joe Silveira, regarding due dates for the  
8 2013 Farm Evaluation.

9 4. Prosecution Team Exhibit 4 is a true and correct copy of the February 6, 2014  
10 notice regarding the 2013 Farm Evaluation sent by the Coalition to Joe Silveira.

11 5. Prosecution Team Exhibit 5 is a true and correct copy of the February 2014  
12 newsletters sent by the Coalition to all of its members, including Joe Silveira.

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 Joe Silveira, who failed to submit the 2013  
15 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 Joe Silveira.

18 8. Prosecution Team Exhibit 8 is a true and correct copy of the December 10, 2014  
19 notice sent by the Coalition to Joe Silveira.

20 9. Prosecution Team Exhibit 9 is a true and correct copy of the May 2015 postcard  
21 sent by the Coalition to members, including Joe Silveira, who failed to submit the 2014  
22 Farm Evaluation by the deadline.

23 10. Prosecution Team Exhibit 10 is a true and correct copy of the June 3, 2015 notice  
24 sent by the Coalition to Joe Silveira.

25 11. Prosecution Team Exhibit 11 is a true and correct copy of the November 2015  
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1 postcard sent by the Coalition to members, including Joe Silveira, who failed to submit the  
2 2014 Farm Evaluation by the deadline.

3 12. Prosecution Team Exhibit 12 is a true and correct copy of Tab 2 of the December  
4 16, 2015 list provided by the Coalition to the Central Valley Water Board of members who  
5 failed to submit Farm Evaluations for 2013 and/or 2014.

6 13. Prosecution Team Exhibit 13 is a true and correct copy of the December 21, 2015  
7 notice sent by the Coalition to Joe Silveira.

8 14. Prosecution Team Exhibit 14 is a true and correct copy of the March 2016 postcard  
9 sent by the Coalition to members, including Joe Silveira, who failed to submit the 2015  
10 Farm Evaluation by the deadline.

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

14 16. Prosecution Team Exhibit 16 is a true and correct copy of the May 2016 notice sent  
15 by the Coalition to members, including Joe Silveira, who failed to submit the 2015 Farm  
16 Evaluation by the deadline.

17 17. As of 8 August 2016, Joe Silveira had not submitted the 2013, 2014, nor 2015  
18 Farm Evaluations to the Coalition.

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

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PARRY KLASSEN