
Central Valley Regional Water Quality Control Board

8 September 2016

VIA OVERNIGHT MAIL

Robin Singh
Singh Farms, LLC
25810 Avenue 11
Madera, CA 93637

VIA OVERNIGHT MAIL

Kashmir K. Singh
25810 Avenue 11
Madera, CA 93637

SUBJECT: SUBMISSION OF DECLARATION RE ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-0548 FOR SINGH FARMS, LLC

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.

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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Tess Dunham, Attorney for the 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:)
Singh Farms, LLC) ACLC No. R5-2016-0548
)
) 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 12, 2015
7 notice sent by the Coalition to Singh Farms, LLC.

8 4. Prosecution Team Exhibit 4 is a true and correct copy of the May 2015 postcard
9 sent by the Coalition to members, including Singh Farms, LLC, who failed to submit the
10 2014 Farm Evaluation by the deadline.

11 5. Prosecution Team Exhibit 5 is a true and correct copy of the June 3, 2015 notice
12 sent by the Coalition to Singh Farms, LLC.

13 6. Prosecution Team Exhibit 6 is a true and correct copy of the November 2015
14 postcard sent by the Coalition to members, including Singh Farms, LLC, who failed to
15 submit the 2014 Farm Evaluation by the deadline.

16 7. Prosecution Team Exhibit 7 is a true and correct copy of Tab 1 of the December
17 16, 2015 list provided by the Coalition to the Central Valley Water Board of members who
18 failed to submit Farm Evaluations for 2013 and/or 2014.

19 8. Prosecution Team Exhibit 8 is a true and correct copy of the December 21, 2015
20 notice sent by the Coalition to Singh Farms, LLC.

21 9. Prosecution Team Exhibit 9 is a true and correct copy of the March 2016 postcard
22 sent by the Coalition to members, including Singh Farms, LLC, who failed to submit the
23 2015 Farm Evaluation by the deadline.

24 10. Prosecution Team Exhibit 10 is a true and correct copy of the April 19, 2016 list
25 provided by the Coalition to the Central Valley Water Board of members who failed to
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1 submit Farm Evaluations for 2013, 2014, and/or 2015.

2 11. Prosecution Team Exhibit 11 is a true and correct copy of the May 2016 notice sent
3 by the Coalition to members, including Singh Farms, LLC, who failed to submit the 2015
4 Farm Evaluation by the deadline.

5 12. As of 8 August 2016, Singh Farms, LLC had not submitted the 2014 or 2015 Farm
6 Evaluations to the Coalition.

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8 Executed this 1 day of September, 2016, at Modesto, California.

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13 PARRY KLASSEN
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