
North Coast Regional Water Quality Control Board

ATTACHMENT B
WAIVER FORM
FOR ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R1-2025-0033

By signing this waiver, I affirm and acknowledge the following:

I am duly authorized to represent Aaron Lieberman, Paradise Valley, LLC, Northcoast Investment Group LLC and Northland Management Group LLC (hereinafter Dischargers) in connection with Administrative Civil Liability Complaint No. R1-2025-0033 (hereinafter Complaint). I am informed that California Water Code section 13323, subdivision (b), states that, “a hearing before the regional board shall be conducted within 90 days after the party has been served with the complaint. The person(s) who have been issued a complaint may waive the right to a hearing.”

- ☐ **OPTION 1: Check here if the Dischargers waive the hearing requirement and will pay the liability in full.**
- a. I hereby waive any right the Dischargers may have to a hearing before the North Coast Regional Water Quality Control Board (North Coast Water Board).
 - b. I certify that the Dischargers will remit payment for the proposed civil liability in the full amount of **Fifty-five thousand one hundred seventy-six dollars (\$55,176)** by submitting a check that references “ACL Complaint No. R1-2025-0033” made payable to the State Water Pollution Cleanup and Abatement Account and mailed to Attn: ACL Payment Accounting Office, P.O. Box 1888, Sacramento, California, 95812-1888, with a copy of the check sent to the North Coast Water Board at northcoast@waterboards.ca.gov within 30 days from the date on which this waiver is executed.
 - c. I understand the payment of the above amount constitutes a proposed settlement of the Complaint, and that any settlement will not become final until after a 30-day public notice and comment period. Should the North Coast Water Board receive significant new information or comments from any source (excluding the North Coast Water Board’s Prosecution Team) during this comment period, the North Coast Water Board’s Assistant Executive Officer may withdraw the Complaint, return payment, and issue a new Complaint. I understand that this proposed settlement is subject to approval by the North Coast Water Board, and that the North Coast Water Board may consider this

HECTOR BEDOLLA, CHAIR | VALERIE QUINTO, EXECUTIVE OFFICER

proposed settlement in a public meeting or hearing. I also understand that approval of the settlement will result in the Dischargers having waived the right to contest the allegations in the Complaint and the imposition of civil liability.

- d. I understand that payment of the above amount is not a substitute for compliance with applicable laws and that continuing violations of the type alleged in the Complaint may subject the Dischargers to further enforcement, including additional civil liability.

☐ **OPTION 2: Check here if the Dischargers waive the 90-day hearing Requirement to engage in settlement discussions.**

- a. I hereby waive any right the Dischargers may have to a hearing before the Regional Water Board within 90 days after service of the Complaint, but I reserve the ability to request a hearing in the future. I certify that the Dischargers will promptly engage the North Coast Water Board Prosecution Team in settlement discussions to attempt to resolve the outstanding violation(s). By checking this box, the Dischargers request that the North Coast Water Board delay the hearing so that the Dischargers and the Prosecution Team can discuss settlement. It remains within the discretion of the North Coast Water Board to agree to delay the hearing. Any proposed settlement is subject to the conditions described above under "Option 1." In these discussions, the Dischargers may raise settlement options, including a Supplemental Environmental Project(s), that meets the State Water Resources Control Board's requirements. Copies of the State Water Resources Control Board's 2024 Water Quality Enforcement Policy and 2018 Policy on Supplemental Environmental Projects, are available at:

https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/2024/2024-enforcement-policy.pdf

and

https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/seps/20180503_sep_policy_amd.pdf

☐ **OPTION 3: Check here if the Dischargers waive the 90-day hearing requirement in order to extend the hearing date and/or hearing deadlines. Attach a separate sheet with the amount of additional time requested and the rationale.**

- a. I, hereby, waive any right the Dischargers may have to a hearing before the North Coast Water Board within 90 days after service of the Complaint. By checking this box, the Dischargers request that the North Coast Water Board delay the hearing and/or hearing deadlines so that the Dischargers may have

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additional time to prepare for the hearing or otherwise resolve this matter including through settlement discussions with the Prosecution Team. I understand that it remains within the discretion of the North Coast Water Board to approve the extension.

**Aaron Lieberman individually and on behalf of:
Paradise Valley LLC, Northcoast Investment
Group LLC, and Northland Management Group
LLC**

(Print Name)

(Signature)

(Date)