

**Central Valley Regional Water Quality Control Board**

8 September 2016

**VIA OVERNIGHT MAIL**

Cynthia Betschart  
Victor Produce, Inc.  
14588 Atwater Jordan Road  
Livingston, CA 95334

**VIA E-MAIL**

J. Scott Dorius  
300 N. Palm Street  
P.O. Box 709  
Turlock, CA 95381  
[scott@turlocklaw.net](mailto:scott@turlocklaw.net)

**VIA OVERNIGHT MAIL**

Jim L. Victor  
Victor Produce, Inc.  
3242 N Washington Road  
Livingston, CA 95334

**SUBJECT: SUBMISSION OF DECLARATION RE ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2016-055 FOR VICTOR PRODUCE, INC.**

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  
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**Prosecution Team:**

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**East San Joaquin Water Quality Coalition:**

Parry Klassen, 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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State Water Resources Control Board  
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5 Attorney for Regional Water Quality Control Board,  
6 Central Valley Region, Prosecution Team

7  
8 BEFORE THE CALIFORNIA WATER QUALITY CONTROL BOARD  
9 CENTRAL VALLEY REGION

10  
11 In the Matter of: )  
Victor Produce, Inc. ) ACLC No. R5-2016-0550  
12 )  
13 ) DECLARATION OF PARRY KLASSEN  
)

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15 I, Parry Klassen, declare as follows:

16 1. I am the Executive Director of the East San Joaquin Water Quality Coalition  
17 (Coalition) and have been in that position for the last twelve (12) years. In my position at  
18 the Coalition, I organize and facilitate meetings for the Board of Directors; review  
19 contracts and invoices for entitles performing work for the Coalition; prepare reports for  
20 the Central Valley Regional Water Board; attend and participate in Central Valley  
21 Regional Water Board meetings and committees related to the Irrigated Lands Regulatory  
22 Program; give presentations to various grower groups regarding the Coalition; prepare  
23 various media for the Coalition, including press releases and newsletters; organize and  
24 participate in Irrigated Lands Regulatory Program meetings for Coalition members;  
25 engage with other watershed coalitions to discuss issues related to Irrigated Lands  
26 Regulatory Program implementation; review mailings and coordinate with Coalition  
27  
28

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 2015 Farm Evaluation.

6 3. Prosecution Team Exhibit 3 is a true and correct copy of the December 21, 2015  
7 notice from the Coalition sent to members, including Victor Produce, Inc., regarding due  
8 dates for the 2015 Farm Evaluation.

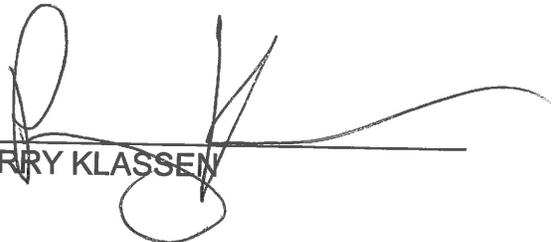
9 4. Prosecution Team Exhibit 4 is a true and correct copy of the March 2016 postcard  
10 sent by the Coalition to members, including Victor Produce, Inc., who failed to submit the  
11 2015 Farm Evaluation by the deadline.

12 5. Prosecution Team Exhibit 5 is a true and correct copy of the April 19, 2016 list  
13 provided by the Coalition to the Central Valley Water Board of members who failed to  
14 submit Farm Evaluations for 2013, 2014, and/or 2015.

15 6. Prosecution Team Exhibit 6 is a true and correct copy of the May 2016 notice sent  
16 by the Coalition to members, including Victor Produce, Inc., who failed to submit the 2015  
17 Farm Evaluation by the deadline.

18 7. As of 8 August 2016, Victor Produce, Inc. had not submitted the 2015 Farm  
19 Evaluation to the Coalition.

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

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PARRY KLASSEN