

List of Prosecution Team Exhibits

Administrative Civil Liability Complaint No. R2-2020-1028
Param and Amandeep Dhillon
Assessor's Parcel Number 0052-160-090
Vallejo, California, Solano County

Exhibit No.	Statute, Regulatory, and Policy Exhibits Provided by Reference ¹
1	Porter-Cologne Water Quality Control Act ⁱ (Water Code Division 7 and Related Sections)
2	State Water Resources Control Board Water Quality Enforcement Policy ⁱⁱ effective October 5, 2017
3	California Environmental Quality Act ⁱⁱⁱ (Pub. Res. Code section 21000 et seq.)
4	White Slough Specific Area Plan ^{iv} (1996, last amended 2010)
5	White Slough Flood Control Study: <ul style="list-style-type: none"> • Draft Environmental Impact Statement, Environmental Impact Report 2001 ^v • Final Detailed Project Report 2001 ^{vi}
6	White Slough Protection and Development Act ^{vii} (Gov't Code section 66670 et seq.)

Exhibit No.	Regulatory Policy Exhibit Provided Electronically
7	California Wetlands Conservation Policy (Executive Order W-59-93)

Exhibit No.	Property Exhibit Provided Electronically
8	Evidence of Ownership of APN 52-160-090: <ul style="list-style-type: none"> • Property Deed • Property Detail Report • Parcel Map for Property • Metroscan Property Profile

¹ References provided by hyperlink; see endnotes for hyperlink addresses

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Exhibit No.	Notices of Violations and Inspections Exhibits Provided Electronically
9	November 18, 2019: Notice of Violation and Report of November 12, 2019, Inspection
10	February 7, 2020: Notice of Violations and 13267 Directive to Submit Technical Reports
11	March 12, 2020: Inspection Photographs
12	April 30, 2020: Notice of Ongoing Violations and Technical Report Deadlines

Exhibit No.	Other Agency Notices and Inspections Exhibits Provided Electronically
13	October 31, 2019: City of Vallejo Stop Work Notice
14	November 4, 8, 9, 2019: San Francisco Bay Conservation and Development Commission Photographs and Matt Trujillo Declaration
15	November 18, 2019: City of Vallejo Administrative Notice of Violations
16	November 29, 2019: U.S. Army Corps of Engineers Notice of Violation
17	December 9, 2019: City of Vallejo Administrative Citation
18	January 8, 2020: San Francisco Bay Conservation and Development Commission Notice of Violation and Directive to Stop Work
19	July 20, 2020: San Francisco Bay Conservation and Development Commission Violation Report and Karen Donovan Declaration

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Exhibit No.	Communication Exhibits Provided Electronically
20	<p style="text-align: center;">Communications Leading to Requirements for Technical Reports (June 2019 to January 2020)</p> <ul style="list-style-type: none"> • June 13, 2019: San Francisco Bay Conservation and Development Commission email to Mr. Dhillon regarding White Slough Specific Area Plan and Regional Water Board jurisdiction. • October 31, 2019: City of Vallejo email to Regional Water Board staff regarding activities at the Dhillon property. • January 13, 2020: Regional Water Board staff email to Mr. Dhillon regarding U.S. Army Corps of Engineers Questionnaire. • January 29, 2020: San Francisco Bay Conservation and Development Commission email to Regional Water Board staff and U.S. Army Corps of Engineers that Mr. Dhillon agreed to hire a wetlands consultant.
21	<p style="text-align: center;">Communications Leading to Administrative Civil Liability Complaint (February to June 2020)</p> <ul style="list-style-type: none"> • February 12, 2020: U.S. Army Corps of Engineers email to Mr. Dhillon regarding agencies jurisdictions and wetlands definitions. • May 7, 2020: Regional Water Board staff email to Mr. Dhillon discussing Regional Water Board jurisdiction and technical report requirements. • May 7, 2020: Mr. Dhillon email to Regional Water Board staff stating his property is not a wetland. • May 13, 2020: Mr. Dhillon email to Regional Water Board staff concerning enforcement during COVID-10 and stating his property is not a wetland. • May 18, 2020: Regional Water Board staff email to Mr. Dhillon regarding compliance with regulatory requirements during COVID-19. • May 20, 2020: Regional Water Board staff email to Mr. Dhillon regarding technical report requirements. • May 21, 2020: Mr. Dhillon email to Regional Water Board staff describing site activities. • May 29, 2020: Regional Water Board staff email to Mr. Dhillon noting deficiencies in his description of site activities. • June 17, 2020: Regional Water Board staff email to Mr. Dhillon requesting property access for an inspection. • June 17, 2020: Mr. Dhillon email to Regional Water Board staff denying property access.

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22	<p data-bbox="386 289 1390 359">Communications After Administrative Civil Liability Complaint Issuance (September to October 2020)</p> <ul data-bbox="386 384 1446 1612" style="list-style-type: none"><li data-bbox="386 384 1321 453">• September 1, 2020: Regional Water Board staff email to Mr. Dhillon confirming receipt of the complaint.<li data-bbox="386 457 1321 527">• September 3, 2020: Regional Water Board staff email to Mr. Dhillon discussing the waiver form and ability or inability to pay.<li data-bbox="386 531 1414 600">• September 4, 2020: Mr. Dhillon email to Regional Water Board staff stating his intent to sign the Waiver Form.<li data-bbox="386 604 1425 674">• September 16, 2020: Mr. Dhillon email to Regional Water Board staff with a signed Waiver Form requesting settlement.<li data-bbox="386 678 1360 747">• September 16, 2020: Regional Water Board staff emails to the Advisory Team and Mr. Dhillon acknowledging receipt of a signed Waiver Form.<li data-bbox="386 751 1442 821">• September 18, 2020: Regional Water Board staff email to Mr. Dhillon (1 of 2) reminding him to provide a scope of work/agreement for wetland delineation.<li data-bbox="386 825 1442 936">• September 18, 2020: Regional Water Board staff email to Mr. Dhillon (2 of 2) clarifying that a call from his consultant is sufficient to confirm wetland delineation work.<li data-bbox="386 940 1430 1010">• September 18, 2020: Mr. Dhillon email to Regional Water Board staff stating he emailed a consultant to discuss wetland delineation work.<li data-bbox="386 1014 1425 1167">• September 24, 2020: Regional Water Board staff email to Mr. Dhillon reminding him to verify that he retained a wetlands consultant and asking him to send Regional Water Board staff an August 4, 2020, report about his property.<li data-bbox="386 1171 1414 1241">• September 28, 2020: Prosecution Team email informing the Advisory Team and Mr. Dhillon when it will respond to Mr. Dhillon's settlement request.<li data-bbox="386 1245 1442 1314">• September 30, 2020: Mr. Dhillon email informing Regional Water Board staff that he has not heard back from the wetlands consultant.<li data-bbox="386 1318 1390 1388">• October 2, 2020: Regional Water Board staff email informing Mr. Dhillon that settlement terms were not met.<li data-bbox="386 1392 1409 1461">• October 2, 2020: Prosecution Team email to inform the Advisory Team and Mr. Dhillon that it does not agree to settlement.<li data-bbox="386 1465 1425 1535">• October 6, 2020: Advisory Team email to all parties affirming the November 18, 2020, hearing will proceed as noticed.<li data-bbox="386 1539 1409 1608">• October 7, 2020: Prosecution Team email to inform the Advisory Team and Mr. Dhillon that no comments were received on complaint.
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Exhibit No.	Financial Exhibits Provided Electronically
23	Cost Benefit Evaluation: <ul style="list-style-type: none"> • Monk Associates Wetland Delineation Estimate, dated August 25, 2020 • U.S. Environmental Protection Agency economic model (BEN Model) results
24	Ability to Pay Evaluation: <ul style="list-style-type: none"> • Property Values and Mortgages for Properties Owned Individually or Jointly by Dischargers • Tax Assessor Information for Properties Owned Individually or Jointly by Dischargers • Westlaw Information for Properties Owned Individually or Jointly by Dischargers • Work/Business Summary
25	Staff Costs
26	Ability to Pay Evaluation Expert Witness Qualifications - German Myers

http://www.waterboards.ca.gov/laws_regulations/docs/portercologne.pdf

ⁱⁱhttps://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/040417_9_final_adopted_policy.pdf

ⁱⁱⁱhttps://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=13.&title=&part=&chapter=1.&article=

^{iv}http://www.bcdc.ca.gov/planning/reports/WhiteSloughSpecificAreaPlan_Jan1996.pdf

^vhttps://books.googleusercontent.com/books/content?req=AKW5QaeZ3Z792IPdwmNkIeLQtbqYH78bdqOxa9QqAzvIXcKdBWnlCa5dGcLk3yZyeCIOI_YBxGTrHK5Kwi3AWL8u-xyCQJhrx_jVLu2zfPK5SYQkQxLWWWyBIXUnbFhWZ7U5ch4xhmo9mJ9-14IIIdK5I8jC4agJdBG5UWcs819FBHpGP6tNNatEN3_byelCYb6iSr8zCbL2lGkHFhMFbGuaLAzrXnHfrY8LiLR573K0GoIWMCKQF_I-qItXrepi3SI2NtoO57kqNzzHr-rlrOPoXiPhxos5GQD_OEe57gUzxBE_2RLB6IY

^{vi}https://books.google.com/books?id=jyg0AQAAMAAJ&printsec=frontcover&source=gbs_ge_summary_r&cad=0#v=onepage&q&f=false

^{vii}https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=&title=7.2.&part=&chapter=6.&article=