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October 22, 2004

Roger W. Briggs, PE  
California Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, California 93401-7906

RE: Expenditures for David Pierson's Huer Huero Ranch

Dear Mr. Briggs:

This letter is submitted in behalf of David Pierson. As per your meeting in your offices on September 23, 2004 with Haig Keligian, Mr. Pierson has reviewed his expenditures in trying to meet the requirements of your Staff. The following information for your review is submitted in mitigation of the proposed penalties:

1. Engineering erosion control plan systems fees paid for said system to EDA	\$20,574.00
2. Total amount for supplies related to erosion	10,405.74
3. Legal expenditures regarding erosion control paid to William S. Walter	3,040.00
4. Aerial Seeding cost	7,629.00
5. Labor cost for 2002	10,968.20
6. Approximate Labor cost for 2003 (labor contractor will forward bills)	30,000.00
<b>Estimated Total Expenses</b>	<b>\$82,616.94</b>


Pierson ACL  
July 8, 2005 Meeting  
Attachment No. 16

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In view of the extent to which money was expended to comply with you Staff's requests, Mr. Pierson feels that the arbitrary fine is unwarranted.

In behalf of our clients, we respectfully request that you review the basis for your stated fine, as I believe it is unwarranted or at the least excessive. Your cooperation in this matter will be appreciated.

Very truly yours,



William S. Walter

cc: Jennifer Soloway