



COUNTY OF SISKIYOU

Board of Supervisors

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September 22, 2022

E. Joaquin Esquivel, Chair
Members of the State Water
Resources Control Board
1001 I Street
Sacramento, CA 95812-2815
Joaquin.Esquivel@waterboards.ca.gov

Gregory Giusti, Chair
Members of the North
Coast Regional Water
Quality Control Board
5550 Skylane Blvd, Ste A
Santa Rosa, California
95403-1072

Charlton H. Bonham,
Director
Department of Fish and
Wildlife
P.O. Box 944209,
Sacramento, CA 94244-
2090
Director@wildlife.ca.gov

Re: Renewed Request for Cannabis Priority Watershed Status and Immediate Inspection and Enforcement Attention for the Shasta River Watershed

Dear Chairs Esquivel and Giusti, Members of the Water Board and Regional Board, and Director Bonham:

The Board of Supervisors of the County of Siskiyou writes to you again following the recent publication of an investigation by the Los Angeles Times on illegal cannabis cultivation in the Shasta Valley watershed.¹ As reported by the Times on September 8, 2022, “[t]he Times mapped more than 1,300 farms in Juniper Flat last year”, covering “more than 10 million square feet”, which was “a 4,200% increase since 2018.”² **The one thousand three-hundred illegal cannabis farms in Juniper Flat represents “the densest known concentration of illegal cannabis cultivation in California.”**³ The Times observed that “[s]o many hoop houses pack this valley near the Oregon border that last year it had the capacity to supply half of California’s entire legal cannabis market.”⁴ The explosive growth of this “[r]ogue cultivation center”, which at dusk “shimmers with a thousand lights”,⁵ is taking place in, and relies upon the water resources of, the Shasta River Watershed, a drought-impacted watershed subject to punishing emergency regulations and curtailments required to save juvenile salmonids and to support migration of

1 The Shasta River is located in Siskiyou County and is a tributary of the Klamath River. The Shasta River is identified by the Department of Fish and Wildlife as a high priority watershed for coho salmon recovery. It is also listed as impaired under Section 303(d) of the Clean Water Act for both water temperature and dissolved oxygen. In the late summer and fall, the river is at risk of high water temperatures and low water levels that can threaten coho.

2 St. John, Paige. “The Reality of Legal Weed in California: Huge Illegal Grows, Violence, Worker Exploitation and Deaths.” Los Angeles Times, 8 Sept. 2022, <https://www.latimes.com/california/story/2022-09-08/reality-of-legal-weed-in-california-illegal-grows-deaths>. (Enclosed herewith as Attachment “A”.)

3 Id.

4 Id.

5 Id.

mature fall-run chinook and coho.

The State Water Resources Control Board, along with other state agencies, must respond to this crisis. The continued inaction of the Water Board and the Department of Cannabis Control in response to the water-related impacts of “industrial-scale complexes” and “cannabis camps [that] glow like a small city”⁶ in a drought-impacted watershed that is critical for salmonids is inexplicable and indefensible. This inaction has failed a community of domestic users, agricultural users, municipalities, tribal governments, recreational enthusiasts, and environmentalists who in good faith devoted years of their lives to working cooperatively on the development of the Shasta Valley’s Groundwater Sustainability Plan.

Consistent with our advisement to you in 2020, the Times reports that in the Shasta River watershed “[s]ome cannabis camps empty their pit toilets onto the ground and trash into other holes... empty fertilizer bags wrap themselves around fences like tumbleweeds... and the land is cut by deep erosion scars littered with empty water totes and growing piles of detritus.”⁷

The Times investigation also describes “daily runs of water trucks”⁸ in the Shasta Valley and references written water delivery schedules associated with cannabis that were discovered by law enforcement. As we urgently advised you in September of 2020, certain agricultural well owners in this valley are alleged to be extracting large volumes of groundwater for distribution to illegal cannabis sites, and this activity is reducing and wasting critical water resources that could be put to beneficial use. The experience of a Times staff member witnessing well extraction activities in this watershed in August is reported as follows:

Last month, four men who appeared to be in their 30s surrounded a Times’ photographer parked along the public highway outside Mount Shasta Vista where he had stopped to document water trucks in the distance filling up at a hay farmer’s well. One of the men took out a tire iron and began hitting the photographer’s car, denting the body and smashing the rear windshield and a sideview mirror.

Another told him: “The only reason you don’t have a bullet in your head right now is because you are talking to me.”⁹

On behalf of the communities of the Shasta River watershed, and on behalf of those who value its ecological and cultural importance, the Siskiyou County Board of Supervisors again urgently requests your assistance to ensure the Shasta Valley’s groundwater and surface water resources are not impaired or wasted and are put to beneficial use. The Board requests that the State Water Resources Control Board, in coordination with the California Department of Fish and Wildlife, recognize the Shasta River watershed as a watershed of special environmental concern and at increased risk of environmental impacts due to the proliferation of illegal cannabis cultivation.¹⁰ **We further once again request the Shasta River Watershed be**

6 St. John, Paige. “The Reality of Legal Weed in California: Huge Illegal Grows, Violence, Worker Exploitation and Deaths.” Los Angeles Times, 8 Sept. 2022, <https://www.latimes.com/california/story/2022-09-08/reality-of-legal-weed-in-california-illegal-grows-deaths>. (Enclosed herewith as Attachment “A”.)

7 Id.

8 Id.

9 Id.

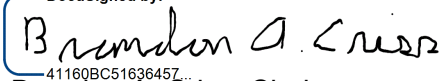
10 The Siskiyou County Code prohibits outdoor cannabis cultivation, and also prohibits all commercial cannabis activities (See Title 10, Chapters 14 and 15 of the Siskiyou County Code). Personal cultivation is limited to the indoor cultivation of a maximum of 12 cannabis plants (Siskiyou County Code, Title 10, Chapter 14). The illegal large-scale cannabis cultivation that is occurring in the watershed is both outdoors and in greenhouse structures.

added to the Cannabis Priority Watershed list and that it receive immediate inspection and enforcement attention from all relevant state agencies.

The Times article observed that “[i]llegal cannabis’ thorniest challenges fall on overwhelmed local law enforcement agencies and code enforcement departments, ill-equipped to contend with criminal networks behind the growth”.¹¹ While the Times article demonstrates “California has done little to address the crisis”,¹² that can change. The Board invites you, and other state agencies, to make that change happen today.

Sincerely,

DocuSigned by:



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Brandon A. Criss, Chair
Board of Supervisors

Enclosure – Los Angeles Times Article

Cc:

The Honorable Gavin Newsom, Governor, State of California
The Honorable Russell Attebery, Chairman, Karuk Tribe
The Honorable Brian Dahle, Member, California State Senate
The Honorable Megan Dahle, Member, California State Assembly
Nicole Elliott, Director, Department of Cannabis Control
Bill Jones, Acting Deputy Director of Enforcement, Department of Cannabis Control
Tina Bartlett, Regional Manager, Northern Region, California Department of Fish and Wildlife
Stormer Feiler, Cannabis Enforcement, North Coast Regional Water Quality Control Board
Jim Simondet, Klamath Branch Chief, West Coast Region, National Marine Fisheries Service

11 St. John, Paige. “The Reality of Legal Weed in California: Huge Illegal Grows, Violence, Worker Exploitation and Deaths.” Los Angeles Times, 8 Sept. 2022, <https://www.latimes.com/california/story/2022-09-08/reality-of-legal-weed-in-california-illegal-grows-deaths>. (Enclosed herewith as Attachment “A”.)

12 Id.

ATTACHMENT "A"

St. John, Paige. "The Reality of Legal Weed in California: Huge Illegal Grows, Violence, Worker Exploitation and Deaths." Los Angeles Times, 8 Sept. 2022 (available at <https://www.latimes.com/california/story/2022-09-08/reality-of-legal-weed-in-california-illegal-grows-deaths>).