

Alpine Amador Butte Calaveras Colusa Del Norte
El Dorado Glenn Humboldt Imperial Inyo Lake
Lassen Madera Mariposa Mendocino



Merced Modoc Mono Napa Nevada Placer
Plumas San Benito Shasta Sierra Siskiyou Sutter
Tehama Trinity Tulare Tuolumne Yolo Yuba

March 7, 2014

The Honorable Patti B. Saris
Chair, United States Sentencing Commission
One Columbus Circle, NE
Washington, D.C. 20002-8002

Dear Judge Saris:

On behalf of the Rural County Representatives of California (RCRC), thank you for the opportunity to comment on the threats to the environment and public safety due to illegal production and cultivation of marijuana on federal public lands.

RCRC is an association of California's rural counties and the RCRC Board of Directors is comprised of elected supervisors from our thirty-four member counties. Our member county supervisors, in conjunction with the county sheriff and others, are responsible for the health and safety of their respective communities.

In California's rural counties, marijuana proliferation is rampant and has been associated with major environmental impacts including water pollution, illegal water diversion, illegal use of fertilizers, and un-regulated logging. Rural county supervisors are greatly concerned with the health and safety risks associated with illegal marijuana grow sites on land owned/managed by federal land management agencies such as the U.S. Forest Service and the Bureau of Land Management. We believe that enhancing the Sentencing Guidelines to add increased sentencing penalty standards related to marijuana production and cultivation would help curb illegal marijuana grows on federal public lands and help prevent the long-term detrimental environmental and health impacts they pose to our local communities.

In some of the most remote areas within California's national forests, there have been many documented cases of illegal marijuana grow sites. Just recently the U.S. Forest Service partnered with the U.S. Army National Guard, State Department of Fish and Wildlife, scientists, multiple environmental organizations and volunteers to shutdown illegal marijuana grow site within Trinity County in the Trinity National Forest where over 5,000 plants were removed. Perhaps more startling were the environmental impacts associated with this grow site – officials and volunteers removed over 8,000 pounds of trash, 4,000 pounds of soluble fertilizer, destroyed 12 dams used to divert more than 7,000 gallons of water and 5 water reservoirs that stored over

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13,000 gallons of water, restored 4 natural springs that were depleted, and discovered at least 8 types of toxicants used for cultivation that were polluting the land. The cost to clean-up these illegal grow sites is extremely high, and rural county supervisors are concerned that if we do not adopt increased national sentencing standards with increased penalties, illegal marijuana cultivation on federal land will continue to proliferate and cause much more serious environmental damage.

We urge the U.S. Sentencing Commission to take action. RCRC believes existing Sentencing Commission Guidelines do not adequately address the long-term effects that marijuana operations on federal lands pose in rural counties. RCRC also believes that financial penalties associated with these illegal grow sites should be provided to state and local agencies for prevention, abatement and enforcement-related activities. Providing incentives for the various federal, state, and local environmental, law enforcement and government agencies to coordinate would be critical to addressing these major environmental impacts.

As the Sentencing Commission reviews Sentencing Guidelines, we urge you to consider the significant impacts of marijuana production and cultivation on federal public lands and add new enhancements to counter the harmful impact caused to local environment and public safety in California's federal lands.

Sincerely,



Patricia Megason
Executive Vice President

cc: The Honorable Jared Huffman, Member of the U.S. House of Representatives
The Honorable Doug La Malfa, Member of the U.S. House of Representatives
The Honorable Mike Thompson, Member of the U.S. House of Representatives