



State Water Resources Control Board

December 13, 2024

CERTIFIED MAIL

CTCC LLC
Agent: Michael McEnry

CERTIFIED MAIL NO: 9589 0710 5270 1738 1304 86

Rockaway Investments, LLC
Agent: Kathy A. Hall

CERTIFIED MAIL NO: 9589 0710 5270 1738 1304 93

NOTICE OF VIOLATION

Investigation ID: 16450

DIVISION OF WATER RIGHTS INVESTIGATION OF HUMBOLDT COUNTY ASSESSOR PARCEL NUMBER (APN) 208-111-028-000, 208-111-022-000, 208-112-007-000

CTCC LLC and Rockaway Investments, LLC,

On October 24, 2024, staff from the State Water Resources Control Board (State Water Board), Division of Water Rights (Division), in coordination with California Department of Fish and Wildlife (CDFW) conducted a search warrant investigation of the property referenced above (Property). The purpose of the investigation was to observe the diversion and use of water occurring on the Property and to evaluate potential impacts to the watershed.

You are being contacted because you were identified as the responsible party and/or property owner of the Humboldt County APN identified above where you are allegedly diverting and using water for cannabis cultivation.

APN 208-111-028-000 is owned by CTCC LLC and is associated with DCC license number CCL20-0000229 which is registered through Rockaway Investments, LLC with water right number H100349 (H500808). This water right was revoked on June 24, 2021. There were also two ground water wells that were not plumbed for use

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

during the inspection. One was on APN 208-111-028-000 and one was on APN 208-112-007-000. APN 208-111-028-000 had Well Completion Report 2018-009402 on file. APN 208-112-007-000 had no Well Completion Report on file. The sole water source for APN 208-111-028-000 was an unauthorized stream diversion in Little Larabee Creek, which was also the only parcel actively growing cannabis. Additionally, there were two statements associated with APN 208-111-007-000. They are S028908 for the pond and S028909 for the diversion in the unnamed stream.

During the investigation, Division staff observed California Water Code (WC) and State Water Board, Cannabis Cultivation Policy (Policy) violations. Enclosed is the Division's Inspection Report (Report) of your Property that includes Division staff observations, alleged violations and the corrective actions necessary for compliance with the WC and the State Water Board's Policy. The enclosed Report constitutes your second notice of the alleged violations and this matter requires your immediate attention. The first notices of violation were left with copies of the search warrant on October 24, 2024 on APN 208-111-028-000 and APN 208-112-007-000. These notices detailed WC and Policy violations and corresponding corrective actions. The information below is a summary of the alleged violations included in the Report.

**Violations and Corrective
Actions 11-21**

Compliance Assistance References 22

The State Water Board retains the authority and discretion to take enforcement action based on the facts and allegations contained herein and you may be subject to further enforcement action before the State Water Board. Therefore, this matter requires your immediate attention. You should follow all staff recommended corrective actions described in the enclosed Report or submit a response indicating any course of action you intend to take or have taken, include an implementation schedule, and/or photo documentation that demonstrates your compliance. You can provide your response, documentation and photos through the Division of Water Rights Cannabis Response Notice Portal detailed in the Report in the **Compliance Assistance References section**.

If you have questions concerning the Report, please contact me by phone at (916) 341-5304, or by email at Tina.Wickeraad@waterboards.ca.gov. Written correspondence can be provided and addressed to the following address: State Water Resources Control Board, Division of Water Rights, P.O. Box 100, Sacramento, CA 95812-0100, Attention: Tina Wickeraad.

Sincerely,

ORIGINAL SIGNED BY:

Tina Wickeraad
Environmental Scientist
Cannabis Enforcement Unit
Division of Water Rights

**Enclosures: Division of Water Rights Inspection Report dated October 24,
2024 ec: Division of Water Rights - Cannabis Enforcement**

Taro Murano
Taro.Murano@waterboards.ca.gov

Stormer Feiler
Stormer.Feiler@waterboards.ca.gov

Laura Cunningham
Laura.Cunningham@waterboards.ca.gov

Cannabis Registration Unit
DWR-cannabisreg@waterboards.ca.gov

Department of Fish and Wildlife
Lt. Brendan Lynch
Brendan.Lynch@wildlife.ca.gov

Joshua Zulliger
Joshua.Zulliger@wildlife.ca.gov

Scott Bauer
Scott.bauer@wildlife.ca.gov

Kalyn Bocast
Kalyn.Bocast@Wildlife.ca.gov

**North Coast Regional Water
Quality Control Board**
Northcoast.Cannabis@waterboards.ca.gov

Adona White
Adona.White@waterboards.ca.gov

Humboldt County Sheriff Office Lieutenant Shawn Sopoaga
ssopoaga@co.humboldt.ca.us

Sgt. Conan Moore
CMoore@co.humboldt.ca.us

**Humboldt County Cannabis
Program**
Planningbuilding@co.humboldt.ca.us

Humboldt County Planning and Building Department
Michael Keen
mkein2@co.humboldt.ca.us

Jose Barajas
Jose.Barajas@cannabis.ca.gov

Jon Silva
Jon.Silva@cannabis.ca.gov

Lindsay Rains
Lindsay.Rains@cannabis.ca.gov

Erin Wonder
Erin.Wonder@cannabis.ca.gov

Marcus Walker
Marcus.Walker@cannabis.ca.gov