

September 18, 2024

Mr. William E. Simpson
Wild Horse Fire Brigade
P.O. Box 202
Yreka, CA 96097

Re: Notice of Demand Letter (August 18, 2024)

Dear Mr. Simpson:

This is in response to your “Notice of Demand Letter” (August 18, 2024). We decline your demand for payment for a horse.

In demanding restitution, you appear to claim ownership of the horse. Please provide written evidence of ownership.

In light of your threatened litigation, I have instructed our field crews (including Kiewit, RES, and McMillen) not to respond to your communications in this matter. Please communicate only with me or our general counsel, Richard Roos-Collins, rcollins@waterpowerlaw.com, (510) 296-5589. We are open to such direct communication, just as Ms. Reeves said for RES in her August 12, 2024 letter.

Under the license surrender order issued by the Federal Energy Regulatory Commission, we must restore fish and wildlife habitat, and protect historical resources, on our lands. The feral horses currently grazing there have caused significant damages to the native vegetation we planted after reservoir drawdown. We are constructing a lawful fence to exclude horses and other livestock. As a courtesy, we notify you that the fence on the north side of the former Iron Gate Reservoir will be complete on or about October 4. For the avoidance of any doubt, this is to confirm that we have not granted permission to you to enter our lands for any purpose.

Sincerely,



Mark Bransom
Chief Executive Officer

Cc: Richard Roos-Collins, KRRC
Jim Smith, Siskiyou County
Elizabeth Nielsen, Siskiyou County
Alison Reeves, RES
Kevin Takei, CDFW