

ROUND VALLEY INDIAN TRIBES
A Sovereign Nation of Confederated Tribes

TRIBAL COUNCIL OFFICE
77826 COVELO ROAD
COVELO, CALIFORNIA 95428
PHONE: 707-983-6126
FAX: 707-983-6128



LOCATION: ON STATE HWY 162
ONE MILE NORTH OF COVELO
IN ROUND VALLEY
TRIBAL TERRITORY SINCE TIME BEGAN

ROUND VALLEY RESERVATION ESTABLISHED 1856

December 15, 2015

Chair Joseph Byrne
California Water Commission
Water Storage Investment Program

Via email to WSIPComments@cwcc.ca.gov

RE: Comments on the scope of the WSIP including outreach and range of alternatives for the Proposition 1 Water Storage Investment Program.

Dear Chair Byrne:

On behalf of the Round Valley Indian Tribes, we have the following comments on the WSIP.

First and foremost, we would like to go on record as vigorously opposing using any Water Storage Investment Program (WSIP) funding for the construction of Sites Reservoir for its "public and ecosystem benefits."

We would also like to point out that the North and Central Coast regions have been largely excluded from this process as the California Water Commission (CWC) has focused its outreach in the lands of the beneficiaries, which include the Central Valley and South Coast of California.

As one of the vast regions of California that will not only receive no benefits from this program, but who may suffer real harms from this program in the future, we conclude our letter with specific recommendations, which unlike the recommendations of the CWC's Stakeholder Advisory Committee (SAC), come from opponents rather than advisors, and therefore, need to be considered as requiring a substantive response as a substantive programmatic reassessment and redirection.

First, we urge the CWC to initiate meaningful engagement with the areas outside the Central Valley and the South Coast that will be subjected to the redirected impacts of providing bond funds for public and environmental benefits for a reservoir that lacks sufficient water sources to fill it in most years. Secondly we urge the Commission to commit the WSIP program to seeking and supporting small distributive groundwater or conjunctive use projects from the Delta watershed, the Central Valley Project (CVP), and State Water Project (SWP) importing regions of the state that provide real ecosystem and public benefits.

Without a substantive course correction at this point in the WSIP program, it appears to us that the CWC's WSIP process is just another "independent" committee process, along with the Bay-Delta Conservation Plan (BDCP) and the Delta Stewardship Council processes, that simply piecemeal the storage and conveyance decision-making for the same range of water supply alternatives by different boards that are appointed by the same administration and staffed by the same Department of Water Resources (DWR) and/or the Bureau of Reclamation (BOR) water storage and conveyance and water selling agencies. We recognize that Westlands Water District and the Metropolitan District of Southern California are the BOR's and the DWR's largest contractors and pay significant portions of the BOR and DWR budget, and are not surprisingly the direct and indirect beneficiaries of the Sites Reservoir project.

We also note that Sites have been specifically identified in the July 2015 version of the Senator Feinstein's federal California Emergency Drought Relief Act. As with the state's approval and financing process for Sites Reservoir, our North Coast and North State interests and concerns have also been excluded and unheard by our Representatives. An excerpt from Senator Feinstein's website on the Act:

"Given the consensus that droughts will grow more severe and the storms that follow more devastating, storing water during wet years for use in dry years is vital. The severity of this drought has highlighted the inadequacy of California's reservoir capacity. The bill takes steps to promote the building of new reservoirs or increasing the capacity of existing reservoirs.

- Establishes deadlines for the Bureau of Reclamation to complete feasibility studies to allow Calfed storage projects to compete for Proposition 1 bond funds.
- Authorizes \$600 million for Calfed water storage projects, which may include both federal projects (Shasta) and non-federal projects (Sites, Temperance Flat, Los Vaqueros).
- Updates Army Corps dam operations to increase water supply while reducing flood risk. Rep. Huffman introduced legislation with a similar program."

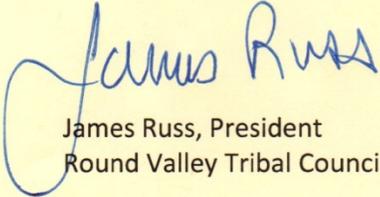
Although we do not delve into the details of the proposed rulemaking here, we would note that the CWC has so far failed to address the concerns of its environmental and environmental justice Stakeholder Advisory Committee (SAC) members about the proposed rulemaking and project analysis and selection process. SAC members are proposing constructive changes to the WSIP program that give due consideration for reasonable and early implementation, and more popular alternatives that, with real support from the WSIP, could provide real ecosystem and public benefits to the entire state. We urge the CWC to seriously facilitate fair consideration of groundwater storage projects that are not insidiously defeated by rulemaking and other programmatic biases towards Sites Reservoir and other large surface storage projects.

We greatly appreciate that the CWC has removed the raising of Shasta Dam from the WSIP because it would flood portions of a wild and scenic river. We also note that the enlargement of Shasta is still in the BOR's program of work, despite the wild and scenic status. Consequently, we are not assured by current protections of wild and scenic river status for the Eel and other Northern California rivers. Until we see those protections reaffirmed in the federal California Emergency Drought legislation, along with groundwater storage being added as an eligible purpose for federal drought relief funding, we remain greatly concerned about the Eel River and our North State rivers.

In conclusion, Tribal concerns of water quantity, Winters Doctrine water rights, and fisheries protection are of paramount importance. The continued attempts to provide water storage for central and southern California negates the well-being of Northern Californian ecosystems and indigenous people.

Californians need to look at other methods of dealing with the lack of water. The economy of California is based upon unsustainable water usage practices. As our climate changes so must our ability to adapt. Current practices, including looking at reservoirs as a viable strategies to cope with climate change are based upon outmoded concepts. Subsidence in various areas are areal problem. It is not in the best interest of Californians to continue favoring the current practices.

Sincerely,



James Russ, President
Round Valley Tribal Council