



# Quartz Valley Indian Reservation

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September 22, 2021

To: Siskiyou County Flood Control and Water Conservation District

From: Quartz Valley Indian Community

**RE: Scott River Groundwater Sustainability Plan Comments**

Chairman Kobseff,

We thank you this opportunity to provide comments on the Scott Valley Groundwater Sustainability Plan (GSP). The Quartz Valley Indian Community (QVIC) sees this process enacted by the Sustainable Groundwater Management Act (SGMA) as an important and necessary step towards ecological balance in the Scott River system. The demands of drinking water, agriculture and the environment have been competing for decades and drought conditions of recent years are exacerbating this issue.

As you are aware, the QVIC was granted a seat on the Scott Groundwater Advisory Committee (SGAC). Our staff was an active participant throughout the entire process reviewing materials and providing verbal and written comments. We feel that many of these comments were not adequately addressed in the development of the current draft of the GSP. SGMA was enacted to be a collaborative process and we were hopeful that this would be a first step in working with our neighbors to develop a GSP that could meet all the needs of the Scott community. We never expected that the SGMA process would resolve all the water problems in the valley, in part because SGMA only applies to a subset of groundwater users (i.e., those not already covered by the existing water rights adjudications) and does not apply to surface water users. However, we are disappointed that the GSP did not propose more ambitious steps towards addressing the critical lack of instream flows in the river during summer and fall. Instead of providing long-term solutions, the GSP seems primarily aimed at continuing the status quo, with only slight improvements proposed. We can envision a future in which fish have the water they need to survive, and farmers and ranchers have secure access to the water needed for their operations; however, the GSP does not do enough to bring that vision closer to becoming reality. Many of the comments herein have already been stated throughout the development of the GSP, we also had an additional technical review from our consultants during this public comment period.

QVIC-001

The technical review has revealed a concerning weakness in the model, particularly in October and November when the groundwater basin is transitioning between draining and filling, those details are included herein. This is most concerning to the Tribe since this is when our salmon are in the Scott system trying to access as much habitat as possible to spawn. We feel that these modeling weaknesses could be refined and alleviated through a more robust monitoring program throughout the valley. On the ground information, through data collection and sharing, will be necessary to build our trust in the accuracy of the model being used to manage the Scott system.

QVIC-002

A significant legal analysis of the GSP was provided to QVIC by the Karuk Tribe, and we have included those comments herein. These legal issues have created uncertainty in the development of the GSP and we feel, had they been resolved early on, a better GSP could have been produced.

We hope these comments are useful and can lead to a final draft that is working toward restoration and a water management strategy that is effective at meeting the needs the Scott River basin.

Administration: 530-468-5907

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We have also attached a Technical Memorandum developed by our consultants on the Shasta GSP. Many of the same legal questions apply to the Shasta GSP as well. Although QVIC staff were focused on the Scott GSP development, the Tribe has ancestral lands in the Shasta basin and development of a solid GSP is just as important there as in the Scott River basin to QVIC membership.

QVIC-003

Thank you and please contact my staff lead, Crystal Robinson, Environmental Director [crystal.robinson@qvir-nsn.gov](mailto:crystal.robinson@qvir-nsn.gov), if you have any technical questions or follow up to these comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'HB', followed by a horizontal line.

Harold Bennett, Tribal Chairman  
Quartz Valley Indian Reservation