



May 22, 2026

Nicole L. Kuenzi
Presiding Hearing Officer
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Support for the Sites Reservoir Project and Recommended Revisions to Draft Water Right Permit

Dear Hearing Officer Kuenzi:

On behalf of the Southern California Water Coalition (SCWC), we respectfully submit this letter in strong support of the Sites Reservoir Project and urge the Administrative Hearings Office of the California State Water Resources Control Board to revise the Draft Water Right Permit consistent with the Sites Project Authority's proposed revisions.

For decades, the Southern California Water Coalition has worked to advance balanced, science-based, and collaborative solutions that improve California's long-term water reliability, strengthen climate resilience, support economic stability, and protect environmental resources for future generations. Sites Reservoir represents one of the most important multi-benefit water resilience investments proposed in California in generations and embodies precisely the type of integrated, forward-looking infrastructure project the state urgently needs.

California's water future is being reshaped by climate volatility, declining snowpack reliability, prolonged droughts, increasingly intense atmospheric rivers, groundwater sustainability challenges, ecosystem pressures, and growing demands on both urban and agricultural water systems. The state's ability to capture, store, and flexibly manage water during wet periods for use during dry years will be essential to maintaining water reliability, environmental stewardship, economic stability, housing development, and public health. Sites Reservoir is uniquely designed to meet these challenges. By capturing water during high-flow periods and storing it off-stream for later use, the Project would provide substantial statewide public benefits including drought preparedness, groundwater sustainability support, operational flexibility, improved environmental management opportunities, enhanced water supply reliability, flood management benefits, and ecosystem support during critical dry periods.

Importantly, Sites Reservoir has earned broad support from urban water agencies, agricultural interests, labor organizations, business leaders, local governments, environmental stakeholders, and communities throughout California because it reflects a balanced approach to integrated water management. Californians





overwhelmingly supported expanded water storage investments through Proposition 1 because voters understood that climate resilience requires modern infrastructure capable of improving flexibility during both wet and dry hydrologic extremes.

The Southern California Water Coalition appreciates that the Draft Decision confirms water is available for appropriation from the Sacramento River for the Sites Reservoir Project. However, several proposed permit conditions risk significantly undermining the Project's ability to deliver the very public benefits the State of California, participating agencies, and California voters have long expected the Project to provide.

In several important respects, the Draft Permit appears to approve the Project in concept while constraining its operations in practice so significantly that the Project's long-term effectiveness, affordability, and public value could be materially diminished.

With respect to Terms 3 and 4, the Coalition strongly supports restoring "water quality" as a purpose of use and "instream" as an authorized place of use within the permit framework.

These revisions are both appropriate and necessary to preserve the operational flexibility needed for Sites Reservoir to function as a true multi-benefit climate resilience project.

Omitting water quality and instream uses risks unnecessarily limiting the Project's ability to support drought response operations, protect Delta water quality, improve instream conditions, and provide water for refuges, wetlands, fish, wildlife, and ecosystem management when California's rivers and environmental systems are under the greatest stress.

California's future water system must become more adaptive and integrated, not less. Sites Reservoir should retain the flexibility to work collaboratively with resource agencies to deliver environmental benefits where and when they are most needed, consistent with applicable permits, agreements, and scientific guidance. A narrow interpretation of allowable environmental uses risks undermining the State's own Healthy Rivers and Landscapes objectives and limiting California's ability to support Pacific Flyway wetlands, refuges, and instream ecological needs during drought emergencies.

The Coalition is also concerned that Draft Permit Term 23 imposes additional diversion restrictions that appear to extend well beyond the operational framework and extensive scientific review already incorporated into the California Department of Fish and Wildlife's approved Operations Incidental Take Permit. The proposed additional restrictions could reduce Project diversions, releases, and deliveries by approximately 12 to 15 percent without clear evidence that such reductions would provide meaningful incremental biological benefit.

California's climate future increasingly depends upon the ability to capture water during shorter, more intense high-flow windows while minimizing ecological impacts. The operational framework approved through the CDFW process was specifically designed to allow diversions during wetter periods when impacts are minimized, and public benefits are maximized. Restricting diversions beyond those scientifically supported operational standards risks reducing stored water supplies available later for drought response, refuges, environmental management, communities, agriculture, and economic stability.



The Board should not equate additional restrictions with improved environmental outcomes absent substantial evidence demonstrating actual biological benefit. A permit that unnecessarily reduces available stored water weakens California's ability to support both human and environmental needs during future drought conditions.

The Coalition further urges revision of Terms 29 and 30 related to implementation of the Bay-Delta Water Quality Control Plan. As currently drafted, these terms could reduce Project yield by an estimated 41 to 48 percent while effectively imposing broad systemwide regulatory obligations on a single project. Such an outcome would significantly impair Project viability, affordability, and long-term public benefit delivery.

Sites Reservoir was specifically designed to operate in a manner supportive of California's broader Bay-Delta objectives by diverting only during wetter conditions, utilizing existing screened facilities, storing water off-stream, and providing operational flexibility that can support environmental purposes during dry periods. Imposing rigid permit conditions disconnected from future hydrologic realities and real-time operational conditions risks preventing the Project from functioning as intended precisely when California most needs additional storage flexibility.

California cannot realistically prepare for longer droughts and greater climate volatility while simultaneously restricting new storage projects from capturing available high-flow water during wet periods. A permit structure that dramatically reduces Project yield before operations even begin risks creating an outcome where the Project exists on paper but cannot effectively deliver meaningful drought resilience, environmental support, or long-term water reliability.

Similarly, Draft Permit Term 31 should be revised to ensure protection of Voluntary Agreement and Healthy Rivers and Landscapes Program flows without unnecessarily preventing diversions during high-flow conditions when water is physically and legally available for appropriation. The Coalition strongly supports California's broader efforts to advance science-based, multi-benefit flow and habitat improvements. However, flow, habitat, storage, and operational flexibility should function together as complementary tools rather than being placed into unnecessary conflict.

The Sites Project is precisely the type of integrated infrastructure investment needed to support California's evolving water management strategy by capturing water during wet periods and making it available later for refuges, wildlife, instream purposes, operational flexibility, drought response, and ecosystem support. Reducing Project yield by approximately 30 percent through rigid operational overlays risks undermining both water supply and environmental objectives simultaneously.

Finally, the Coalition believes Draft Permit Term 49 should be revised because the Draft Decision does not adequately establish a clear evidentiary connection between the Project's proposed north Delta diversions and alleged impacts to southern Delta water levels. Project-specific operational constraints of this significance should be based upon demonstrated Project effects rather than generalized concerns regarding broader Delta operational challenges that long predate the Sites Reservoir Project.



More broadly, California did not spend decades planning, studying, funding, and negotiating one of the state's most important new off-stream storage projects only to approve it in name while rendering it operationally constrained and economically diminished in practice.

Sites Reservoir is not seeking special treatment. Rather, the Project seeks a permit structure that allows it to operate as designed: off-stream, science-based, flexible, environmentally protective, operationally adaptive, and capable of delivering the broad public benefits Californians were promised and overwhelmingly supported through Proposition 1.

Every unnecessary restriction that lacks demonstrated public or environmental benefit is ultimately a decision to leave future drought protection water uncaptured, future ecosystem support unavailable, and future communities more vulnerable to climate extremes.

California's future resilience depends upon integrated solutions that combine storage, operational flexibility, environmental stewardship, groundwater sustainability, and adaptive management. The Board should ensure the final permit framework preserves the Project's ability to help solve California's long-term water challenges rather than creating operational limitations that reduce its effectiveness before construction even begins.

The Southern California Water Coalition respectfully urges the Administrative Hearings Office to revise the Draft Water Right Permit consistent with the Sites Project Authority's proposed revisions and help ensure that Sites Reservoir can move forward as the flexible, multi-benefit, climate resilience project California urgently needs.

Sincerely,

Charles Wilson

Executive Director

Southern California Water Coalition