Friends of Amador County

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July 8, 2011

U.S. Environmental Protection Agency
Eurika Durr
Board Clerk
Environmental Appeals Board
Colorado Building
1341 G. Street, N.W., Suite 600
Washington, D.C. 20005

Regarding Buena Vista Rancheria Wastewater Treatment Plant, NPDES Appeal filed by the Friends of Amador County

Dear Ms. Durr,

Enclosed is a copy of an e-mail sent to you by Ms. Asami, Counsel for the Region IX office. Several comments in this e-mail are cause for concern for the Friends of Amador County (FOAC). Unless we are misinterpreting Ms. Asami's comments, it appears that EPA Region IX was unaware of the Amador County lawsuit, which was filed years ago and just two months ago, was remanded back to the lower court for hearing. Ms. Asami stated, "We note that the Region had been unaware of this litigation until very recently when the Tribe and its project developer informed the Region of the D.C. Circuit's decision." Is it possible then that neither Region IX nor the Appeals Board is aware of the lawsuit filed by FOAC, which is scheduled for trial this year? So that the Appeals Board has that information, a hard copy of the e-mail our attorney sent to Region IX in that regard is enclosed.

Since Region IX was unaware of the Amador County lawsuit and since no mention was made of the FOAC lawsuit, we can only speculate as to the amount and accuracy of information presented to the Appeals Board. Region IX was well aware of the FOAC lawsuit as we provided a copy shortly after it was filed. Our written appeal of the wastewater permit was based on the assumption that all the information we provided to Region IX was made a part of the record and forwarded to the Appeals Board. Therefore our written appeal did not contain all of the reams of information that we had previously provided to Region IX. To insure that the Appeals Board has knowledge of the most important issues surrounding this permit (in addition to the legal issues regarding the status of the land outlined in our lawsuit) the information provided below is presented for your consideration.

The Appeals Board should be aware that approval of this permit will allow the discharge of thousand upon thousand of gallons of treated wastewater at the Buena Vista sites western boundary line. This discharge would then run for approximately 4 miles in an open and shallow ditch across numerous private properties before it finally discharges into the Jackson Creek waterway. This shallow ditch, which EPA misleadingly refers to as an "unnamed tributary" normally, only contains water during the winter months and during some times in the summer when irrigation from farm lands flow into the ditch. During the winter runoff water frequently floods on to open fields and floods many of the narrow two-lane roads in the area. Photographic evidence of this flooding was provided to Region IX twice as they claimed they did not receive the first mailing. The appeals Board should be advised that none of the approximately fifteen private property owners who are down stream have given their permission for wastewater discharge on to their property. To the contrary, they signed a letter of protest, which was sent to Region IX, and they have yet to receive a response. To add insult to injury those same property owners (ranchers and farmers) have

had to join a group called the Amador Sacramento Water Alliance and pay yearly dues just to get some degree of protection from the liability of violating increasingly more strict EPA water runoff regulations. Now that same EPA is requesting an expedited hearing from the Appeals Board on behalf of those who would dump that wastewater on private property. Downstream farmers and ranchers will have to rely on the good will of a "sovereign nation" and monitoring efforts by EPA to insure that no pollutants flow across their property. These ranchers and farmers have already experienced the lack of good will displayed by this sovereign nation and the disregard for addressing environmental concerns displayed by the EPA.

It is particularly troubling that this request for an expedited appeal is apparently driven by the desire for "financing" as reflected in the statement by Ms. Asami that, "In addition, in light of the information contained in the Tribe's letter, the Region believes it is appropriate to issue the NTP expeditiously." The concerns regarding the "financing" of a project would seem to be beyond the purview of the EPA, an agency formed to protect the environment. In all fairness, perhaps EPA has some obligation to provide assistance to the Tribe. If that is so then isn't EPA equally obligated to address the concerns of the downstream residents? EPA promised an answer to every question (approximately 200) asked by the public at a town hall meeting years ago. We have yet to receive even one answer. At the very least what is on full display here is EPA's unequal treatment of Tribal and public concerns. EPA is very attentative of Tribal concerns and very dismissive of the concerns of the taxpaying downstream property owners. Is it any wonder that, according to every poll, the vast majority of taxpayers have lost faith in their government? It is our well held opinion that the actions displayed by EPA during this permitting process shows a total lack of regard for the concerns of private citizens while attempting to appear to address those concerns. EPA conducted a public hearing taking questions but then failed to respond to those questions as promised. EPA solicited written comments from the public and then failed to address those concerns and recommend approval of the permit. This permit would allow the discharge of wastewater flows miles from a waterway from a facility with a daily population larger than any city in Amador County and yet few of the citizen's concerns have been addressed.

What is the greater good that requires the approval of this permit to the detriment of numerous downstream properties? It is to improve the financial situation of a one person Tribe that already receives from $1.2 million to $1.6 million annually from California's casino Tribes revenue sharing funds. Those monies are in addition to the numerous federal subsidies paid to this one person Tribe for such things as housing, healthcare etc.

Hopefully, the information in this letter including the information provided by our attorney, will allow the Appeals Board to study this matter carefully before making a decision to issue or not issue the permit in question or the requested NTP.

By copy of this letter and enclosures, FOAC is requesting that Senator Feinstein and Representative Lungren conduct an investigation into the Buena Vista Rancheria Wastewater permitting process.

Thank you for considering this information. We would be happy to provide any further documentation or information upon request.

Sincerely,

Jerry Cassesi
Chairman, Friends of Amador County

cc. Honorable Dianne Feinstein via fax with enclosures
Honorable Dan Lungren via fax with enclosures

jerry cassesi

From: "jerry cassesi" <lucydog@wildblue.net>
To: "Jerry Cassesi" <lucydog@wildblue.net>
Sent: Friday, July 08, 2011 3:29 PM
Subject: Fw: Pending litigation concerning the status of Buena Vista fee lands

----- Original Message -----
From: James Marino
To: asami.joann@epa.gov
Cc: siegal.tod@epa.gov ; arnold@buenavistatribe.com ; Cathy Christian ; Jerry Cassissi ; glenvilla@sbcglobal.net ; william.wood@hklaw.com
Sent: Friday, July 08, 2011 10:01 AM
Subject: Pending litigation concerning the status of Buena Vista fee lands

Dear Ms. Asami;

It has come to my attention via correspondence and e-mails that the EPA is unaware of the status of the fee lands located at Buena Vista, in Amador County and the pending lawsuits in which the status of that land is a major issue. Apparently the EPA was unaware of the pending lawsuit by Amador County which just recently was remanded by the Washington D.C. Circuit Court of Appeals back to the District Court for further hearing or trial. That Appeal court's decision held that the County did in fact have standing to challenge a number of issues affecting the status of that land, including all the required permitting and procedures that would be associated with the "Buena Vista Rancheria of Me-Wuk Indians' and their pending applications for waste water discharge and many other important regulatory issues, (including the elligibility or lack of elligiibility of that Buena Vista land to conduct either class II or class III gaming activities there, pursuant to the Indian Gaming and Regulatoy Act of 1988 (IRGA) (25 USC 2703 and 25 USC 2719).

Not only was your agency apparently unaware of that pending County lawsuit but you seem to be unaware of the lawsuit filed by the Friends of Amador County (FOAC) and two of the descendants of the original occupying/assignees of the former rancheria before it was dissolved and dis-established from any form or class of "Indian Country", that is, Bea Crabtree and June Guerry. To be classified as any of the three categories of Indian Country the land would have to be either an Indian reservation established under the authority of Congress, or Indian trust land or restricted Indian fee lands established by federal law and administrative process under the Indian Reorganization Act of 1934 (25 USC 465 et. seq.)

The 67.5 acres of fee land that formed the former rancheria, was acquired in 1927 by the federal govenrment in FEE as a rancheria for the use of any needy or itinerant Indian and not for the benefit of any particular tribe, band or community of Indians and was made available for formal or informal assignment to such Indians in need of a place to live. The only family that occupied the land after it's 1927 purchase was the Oliver family. They had no formal assignment but eventually were granted an informal "at will" assignment. When the Rancheria Act was enacted the entire parcel of fee land at Buena Vista was deeded in fee simple to Louie Oliver and Annie Oliver in joint tenancy as husband and wife. The conveyance by deed to them was without any restriction whatsoever and the Olivers were notified of that fact by letter from the Bureau of Indian Affairs (BIA) of the U.S. Department of Interior (DOI)

In 1979 a group of Rancherias and individual Indians sued the federal government in a case called Tillie-Hardwick v. United States. This case was later certified as a class action including what was described as the "Buena Vista Rancheria" constituting one of the 17 class plaintiffs. The primary assertions of the Plaintiffs and their class counsel were that promises were made to some of the rancheria occupants which were not kept and that after dissolution of the rancherias and distribution of the lands, the promises remained unfufilled. Also by operation of law, the occupants lost their status as "Indians" and therefore the implimentation of the Rancheria Act was unlawful and the termination of the status of "rancherias" was unlawful, in that it terminated their status as Indians. The complaint also named several Counties as defendants asserting that the counties were then illegally taxing rancheria lands that

had been distributed pursuant to the Rancheria Act. The complaint also prayed that individuals who had recieved rancheria lands, distributed to them in fee (as the Olivers had recieved in 1959) that these distributees be allowed, if they chose to do so, to return the land and reconvey or deed the land recieved, back to the federal government in trust pursuant to the Indian Reorganization Act of 1934, (IRA 25 USC 465 et. seq.) and the applicable provisions of the Code of Federal Regulations.

In 1983 the federal government and the class Plaintiffs reached a stipulated settlement and judgment based on that settlement which was then entered by the Federal District Court in 1983. In relevant part it porvided that any individual Indians (like the Olivers at Buena Vista) who were deeded rancheria lands in fee could elect to deed their fee lands back to the federal government to be held in trust. They were allowed two years to make this election unless they made a formal motion to the court to extend the grace period provided by the stipulated judgment, otherwise they could simply keep the land in fee as their own without the benefit of any federal programs to aid qualified "Indian lands". The land would then remain in fee ownership and in unrestricted status just as it was originally deeded to them (in the case of the Olivers in 1959). In that judgment the court retained jurisdiction over the boundaries of the former rancheria lands because until it was determined which lands, if any, were to be deeded back to the U.S. in trust during the election period provided to distributees, then these boundaries could not be finally established. The descendants of the original distributees (Annie Oliver and Louie Oliver) did not elect to convey and deed the former Buena Vista rancheria land they had inherited, back to the federal government in trust but instead elected to keep it in fee.

As of the date of the 1983 stipulated judgment the fee lands at Buena Vista belonged to the two children of the Olivers, Enos Oliver and Lucille Lucero (nee Oliver) as they both had inherited the undivided 1/2 interests in that 67.5 acre parcel of land by intestate succession from the estate of Louie Oliver who had died intestate. (Annie Oliver had predeceased him making Louie sole fee owner as the surviving joint tenant between them) In 1986 Lucille Lucero conveyed her entire undivided one half (1/2) interest in the BV fee lands to DonnaMarie Potts by grant deed for valuable consideration and no longer held any present interest in the property in 1987 at the time of the County stipualtion discussed infra.. In the interim Enos Oliver had died, so his one half (1/2) undivided fee interest was under the juridsiction and control of the Amador County Probate Court for administration and to await an order of final distribution. It was there for administration because Enos Oliver had also died intestate.

In 1987 the class Plaintiffs in the Tillie-Hardwick case and their legal counsel entered into stipulations with several counties by which certain counties agreed to treat the fee lands, then owned by distributees of the rancheria lands, as "Indian Country" for the purpose of avoiding property taxes and certain county regulatory actions. This stipulation was personal to the distributees under the Tillie-Hardwick judgment as long as they still owned the distributed land and the county required the distributee/fee owners seeking property tax exemption to file an annual claim of exemption. The stipulation was not recorded and did not run with the land for the benefit of any subsequent successors or assigns who were not descendants of the original distributees. Nor did the estate of Enos Oliver or the then fee owner DonnaMarie Potts join in the 1987 stipuatlion or substitute into the Tillie-Hardwick case as additional or substituted Plaintiffs.

In 1996 the estates of Lydia Oliver (Enos' wife) and Enos Oliver were settled and the remaining undistributed 1/2 interest in the fee lands, being held by the Probate Court, were distributed and deeded ,pursuant to an order of final distribution, IN FEE to DonnaMarie Potts who was then owner of the other 1/2 fee interest, since it was deeded to her by Lucille Lucero in 1986. Having unified the fee title in 1996 DonnaMarie Potts then immediately deeded all of those Buena Vista fee lands to an entity she had entitled the "Buena Vista Rancheria of Me-Wuk Indians" a putative Indian tribe who's legitimate status is currently being challenged by Bea Crabtree and June Guerry, the lawfull descendants of the Oliver Family and who were entitled to organize any such tribe, band or community of "Me-Wuk" Indians at Buena Vista California.

To sum up, these historical and undisputable facts establish that the 67.5 acres of land at Buena Vista are FEE LANDS with no Indian or sovereign Indian status. In a letter to Alexis Strauss from Arnold D. Samuel, legal counsel for this putatuve band of "Indians", he describes the Buena Vista fee lands as "Indian Land", or perhaps more accurately, he states in a letter of 26 May 2011, that the Department of Interior describes the BV land as "Indian Land". That term is meaningIless. Indian tribes can buy and own land just like anyone else and it is to be treated in all respects just as any other land owned by non-Indians. [See City of Sherrill New York v. Oneida Indian Tribe of New York (2005) 544 U.S. 197] . The only categories of land to be treated differently because of

it's staus is 1. Indian Reservation lands, 2. federal Indian trust lands, or 3. federal Indian restricted fee lands, all of which constitutes the broad generic term "Indian Country".

The 1987 County stipulation agreeing to TREAT the Buena Vista lands AS IF it were "Indian Country" did not, and cannot change the status of that land nor convert that land to "Indian Country" of any category. To treat somethng AS IF IT WERE SOMETHING IT IS NOT, cannot effectuate an actual change in legal status just by calling it that. No authoritative representative of the federal government entered into that 1987 stipulation nor did the actual owners of the BV fee lands at that time, DonnaMarie Potts. The Estate of Enos Oliver did not enter into any stipualtion in 1987 and they were the only persons empowered to make agreements concerning the BV land status. Also neither of these owners were class Plaintiffs in the Tillie-Hardwick case and did not substitute into that case or join it in any way. With respect to the estate of Enos Olver any stipulation affecting the status of the 1/2 interest in the Buena Vista land under the jurisdiction and control of the Amador County Probate Court, would have required an application or motion by the personal representative of the estate and the entry of a court order approving any such stipulation because (among other things) it would also affect the evaluation of the estate and any estate tax due, any fees and inheritance tax appraisals based upon an Indian reservation or Indian trust status or restricted fee status of those lands lands as opposed to fee simple property passing through probate to the devisees determined by the court to be entitled to a final distribution of the land. If the BV fee lands had any "Indian status" or Indian Characteristics to the land, then the inheritance and distribution process would also have been required to have the approval of the Bureau of Indian Affairs, Indian lands inheritance division.

Therfore, as a result of this undisputable history and series of factual and legal events, any and all federal, state and local regulations must be applied to the Buena Vista land that would be applicable to any other fee lands owned by non-Indians. It also conclusively establishes that the land is NOT ELLIGIBLE for the proposed gaming casino there, notwithstanding the improperly approved tribal "gaming ordinance" and the existance of an executed "tribal-state gaming compact" entered into with the state of California. These importanct questions are at the center of the two pending lawsuits and will result, if needed, in the application for a preliminary injunction, or any related restraining orders, writs of prohibition or mandamus as may be necessary pending the conclusion of these lawsuits.

_____ Information from ESET NOD32 Antivirus, version of virus signature database 6278 (20110708)

The message was checked by ESET NOD32 Antivirus.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 5, 2011

Sent via electronic and overnight mail

U.S. Environmental Protection Agency
Eurika Durr
Clerk of the Board
Environmental Appeals Board
Colorado Building
1341 G Street, N.W., Suite 600
Washington, DC 20005

Re: Buena Vista Rancheria Wastewater Treatment Plant, NPDES Appeal Nos. 10-05 - 10-07 & 10-13

Dear Ms. Durr:

Pending before the Environmental Appeals Board (Board) are four petitions filed in the above-referenced matter seeking review of a Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) permit issued by U.S. EPA Region 9 (Region) to the Buena Vista Rancheria of Me-Wuk Indians (Tribe) for a proposed casino project (proposed project) in Amador County, California. By this letter, the Region respectfully informs the Board of developments relating to the proposed project that have occurred subsequent to filing of the Petitions and the Region's Response to Petitions for Review.[1]

National Historic Preservation Act Memorandum of Agreement

Two of the petitions pending before the Board challenge elements of the Region's compliance with the procedural requirements of Section 106 of the National Historic Preservation Act (NHPA). As explained in the Response to Petitions for Review, the Region determined that issuance of the federal NPDES permit was a federal undertaking subject to NHPA Section 106. Accordingly, as required by that statute, the Region engaged in a consultation process that included the California State Historic Preservation Office (SHPO), the Army Corps of Engineers (Corps), the Tribe, and all of the Petitioners. At the conclusion of this process, the Region entered into a Memorandum of Agreement (MOA) with the SHPO, the

[1] The four petitions were filed by Glenn Villa, Jr. (No. 10-05); County of Amador (No. 10-06); Friends of Amador County (No. 10-07); and Ione Band of Miwok Indians (No. 10-13).

Corps and the Tribe to resolve adverse effects on historic properties that were identified during the consultation. Under the NHPA Section 106 implementing regulations, such an MOA governs the undertaking, and the federal agency must ensure that the undertaking is carried out in accordance with the MOA. 36 C.F.R. § 800.6(c).

Under the NHPA MOA, the parties agreed to a variety of provisions relating to the Tribe's construction of the proposed project. Of relevance here, the parties established a process for EPA to issue Notices to Proceed (NTP) with construction of segments of the proposed project upon the occurrence of one or more specified conditions. These conditions were largely established as an additional safeguard to ensure that previously unevaluated historic properties did not exist at the site of, or would not be adversely affected by, construction of the project segment at issue.[2]

On December 10, 2010, the Tribe submitted to the Region the completed fieldwork phase of the Archaeological Testing Program established under the NHPA MOA and its related Historic Properties Treatment Plan. The Region has consulted with the SHPO and the Corps and believes that the Archaeological Testing Program's findings are acceptable, thus satisfying Section IV.C of the governing MOA and establishing a clear basis for issuance of a NTP.

By letter dated May 26, 2011, the Tribe requested that the Region issue a NTP as soon as possible. (Enclosure 1, Letter from Arnold D. Samuel, General Counsel, Buena Vista Rancheria Me-Wuk Indians, to Alexis Strauss, Director, Water Division, U.S. EPA, Region 9). As explained in this letter and in the attached supporting correspondence from the bank assisting the Tribe with its financing, the proposed project requires financing from a volatile high-yield bond market which "risks closing at any time," thus posing a risk to the "ultimate viability of the project." Enclosure 1 at pp. 1 and 2. Given these potential risks to the Tribe's financing – and

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[2] AR at 1025-1035 (MOA at 3-4). Specifically, Section IV of the MOA provides:

IV. NOTICES TO PROCEED WITH CONSTRUCTION

EPA may issue Notices to Proceed (NTP) under any of the conditions listed below. Issuance of a NTP by the EPA does not constitute and shall not be interpreted to be authorization to discharge dredged and/or fill material pursuant to Section 404 of the Clean Water Act, 33 U.S.C. § 1344.

A. EPA, in consultation with SHPO, determines that there are no unevaluated historic properties within the APE for a particular construction segment; or

B. EPA, in consultation with SHPO, determines that there are no historic properties within the APE for a particular construction segment; or

C. EPA, in consultation with SHPO and signatories, determines that for a particular construction segment: (1) the fieldwork phase of the "Archaeological Testing Program," provision of the HPTP has been completed; and (2) EPA has accepted a summary of the fieldwork performed and a reporting schedule for that work.

D. EPA, in consultation with SHPO and signatories, determines that conditions resulting in the issuance of a "Stop Work," under the HPTP have been resolved.

thus to the proposed project as a whole – the Tribe urged the Region to issue the NTP, which is the only barrier to commencement of construction of the proposed project, as soon as possible.

Because the Tribe has satisfied the condition at Section IV.C of the NHPA MOA, the Region believes the Tribe is eligible for a NTP as contemplated by the governing MOA. In addition, in light of the information contained in the Tribe's letter, the Region believes it is appropriate to issue the NTP expeditiously. Following issuance of the NTP, the Tribe would be able to commence construction of the proposed project consistent with the terms of the NHPA MOA.[3] The Region by this letter informs the Board that we intend to issue a NTP to the Tribe no sooner than 21 days from the date of this letter.

Federal Court Litigation Re: the Buena Vista Rancheria

In addition, as a courtesy, the Region would like to bring to the Board's attention a recent decision in a federal court litigation currently ongoing between the County of Amador (County), one of the Petitioners before the Board, and the U.S. Department of the Interior (DOI). *Amador County v. Salazar*, No.10-5240 (D.C. Cir. May 6, 2011) (Enclosure 2). We note that the Region had been unaware of this litigation until very recently when the Tribe and its project developer informed the Region of the D.C. Circuit's decision.

Amador County involves a challenge by the County to DOI's approval through inaction of an amendment to the Tribe's gaming compact with the State of California. The County challenged the Compact Amendment on the basis that, as alleged by the County, the Buena Vista Rancheria fails to qualify as "Indian land" as required under the Indian Gaming Regulatory Act (IGRA), 25 U.S.C. § 2701, *et seq*. *Amador County*, slip op. at 6. The district court had dismissed the County's case without addressing the merits of the "Indian land" issue, finding that DOI's approval of the gaming compact was unreviewable. *Amador County v. Kempthorne*, 592 F. Supp.2d 101, 106-07 (D. D.C. 2009). The D.C. Circuit reversed and remanded for consideration of the merits, holding that judicial review of DOI's action was available consistent with both IGRA and the Administrative Procedure Act. *Amador County*, slip op. at 11-17, 20.

We note that in its Petition for Review of the instant NPDES permit and in certain related filings with the Board, the County asserts an argument that the Buena Vista Rancheria is not Indian country for purposes of the Region's NPDES permitting authority. The Region addressed this argument in its Response to Petitions for Review as well as in responding to the County's related submissions. Because the federal district and circuit court decisions in *Amador County* address solely jurisdictional and judicial reviewability issues – and do not reach the merits of the "Indian land" issue – they do not affect the Region's position regarding the land status of the Buena Vista Rancheria and the Region's authority to issue the NPDES permit for the proposed project. In particular, it continues to be EPA's position that the Rancheria is an Indian reservation, and thus Indian country, for purposes of federal NPDES permitting authority. The Region notes that this position is entirely consistent with that of the United States as a whole

[3] The Region notes that the CWA does not prohibit the commencement of construction of a facility prior to final issuance of an NPDES permit for discharges of wastewater from the constructed facility. *Natural Resources Defense Council, Inc. v. U.S. EPA*, 822 F.2d 104, 128 (D.C. Cir. 1987).

regarding the Rancheria's land status, as evidenced by the U.S. Department of Justice's filings in the *Amador County* case.

Respectfully submitted,

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Enclosures

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