



# ECOS

ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

July 6, 2022

E. Joaquin Esquivel, Chair  
State Water Resources Control Board  
c/o Administrative Hearings Office (AHO)  
[adminhrgoffice@waterboards.ca.gov](mailto:adminhrgoffice@waterboards.ca.gov)  
Via email

RE: San Joaquin County application #29657 from 1990

Dear Chair Esquivel and Members of the Board,

The Environmental Council of Sacramento (ECOS) supports the AHO's recommendation to cancel San Joaquin County's application #29657 from 1990. Over many years, San Joaquin County's conduct of due diligence has been inadequate as related to the Sacramento water interests affected by the application and to the Water Forum.

Some background:

The co-equal goals of the Sacramento Water Forum are to meet the water needs of the Sacramento area and to protect the American River. The Environmental Council of Sacramento has been a member of the Water Forum since 1993. Something on the order of \$40 million has been expended by the Water Forum to carry out these goals, working with our many partners, including the Bureau of Reclamation.

While not the subject of the AHO's recommendation, the diversion of 147,000 acre-feet of American River Water to San Joaquin County, as envisioned in application #29657, would have substantial adverse impacts to the American River and would disrupt the Water Forum's 29 years of work to meet water needs, protect river flows, manage river temperatures for salmon and steelhead, and restore aquatic habitats in the Lower American River. The up-stream diversion would likely impact river flows and summer temperatures. With climate change and the projected demand in this region, the river cannot absorb an additional 140,000+ acre feet of diversion and still maintain the fishery and full recreational potential of the lower American river.

Over the approximately three decades since this application was filed, San Joaquin County made only trivial efforts to engage with the affected Sacramento water interests. In addition, San Joaquin County never engaged with the Water Forum. This does not constitute adequate due diligence. Thank you for your consideration.

Sincerely yours,

Susan Herre  
President of the ECOS Board of Directors

Ted Rauh  
Chair of ECOS Water Committee

The mission of ECOS is to achieve regional sustainability, livable communities, environmental justice, and a healthy environment and economy for existing and future residents.

ECOS strives to bring positive change to the Sacramento region by proactively working with individual and organizational ECOS members, neighborhood groups, and local and regional governments.

ECOS implements its mission through its expertise coalition, community partnerships, and environmental activism as related to:

- Climate change
- Land use
- Transportation systems
- Air quality
- Green building
- Environmental Justice
- Preservation of habitat and open space
- Water quantity and quality
- Preservation of natural resources
- Urban and rural agriculture
- Solid waste and recycling