

October 12, 2011
P.O. Box 1173
Pinecrest, CA 95364

State Water Resources Control Board
Division of Water Rights
Attention: Kari Kyler
P.O. Box 2000
Sacramento, CA 95812-2000

Re: Sep 29 2011 Revised Notice Spring-Gap Stanislaus Hydroelectric Project –
Pinecrest Reservoir Minimum Lake-Level

Dear Ms. Kyler,

Following are my comments on the Pinecrest Reservoir Lake Level Study Report,
Final, April 2011, (FERC Project No. 2130).

1. **Recreation Season:** The end of seasonal recreation use at Pinecrest Lake should be changed from Labor Day to October 1. The Lake continues to see visitor use between Labor Day and the middle of October. The fall is a beautiful time to enjoy Pinecrest Lake.
2. **Surface Recreation:** The Study did not address recreation conditions on the surface of the Lake as water elevation recedes. As the Lake shrinks in perimeter, watercraft activities are condensed into a smaller area. Submerged hazards in various parts of the Lake begin to impair use of the Lake surface. Rocks and rock islands surface as elevation recedes, presenting serious navigational hazards and minimizing surface area available for boating. Lower levels exacerbate overcrowding of watercraft on the Lake.
3. **Clearing Beaches:** Consider clearing rocks and stumps on beaches to only the “good” or “fair” standard. Selectively apply the 6” height standard. Some larger rocks on the beaches are useful as back and foot rests. Pristine beaches are not expected at Pinecrest. It is a mountain lake and should be managed in as natural a state as possible.

The Report describes “Facility 4 – Mixed Day Use” as being unimpaired for all activities studied. In the early 1980’s in October when the water was low, cabin owners gathered in that area for two weekends during which they physically moved rocks to the water line. Physical labor and heavy equipment created the unimpaired beach that exists today, with good rocks maintained for back and foot rests. (Toot horn here.)

4. **Beach Sand:** Importing beach sand is only a useful mitigation measure if the importation is scheduled on a regular basis. Water flow within the lake coupled

with natural precipitation run-off from the day use areas adjacent to the lake cause continuous dislocation of the sand into the lake. The current deep ravines on the beaches in the swim area are a hazard and should be fixed.

5. **Swim Area Buoys:** Construction of an adjustable buoy line in the main swimming area would be a positive management action. I do not support placing a fixed buoy line within the swimming area because initial placement early in the season would have to extend too far out into the Lake in order to maintain a sizeable swimming area later in the season as the water recedes.
6. **Lower “Fishing Platform”:** I understand from the Forest Service that the lower fishing platform and associated walkway is to be removed. Should this prove an inaccurate understanding, I strongly urge the lower pod and walkway be removed. They are dangerous and ineffective structures. By no means should a third platform be constructed as suggested in the Report as a mitigation measure for elevations below 5605’.
7. **Upper “Fishing Platform”:** The upper fishing platform should also be removed. It was originally erected to meet an ADA requirement, but a poor design was chosen. It is only useful as a fishing pier for a very short time during the season. The rest of the time it is a hulking and ugly protrusion of concrete that detracts from the aesthetics of the Lake and creates an impediment to shoreline use until the mud dries out as the Lake recedes. The Report states that the upper platform is usable to 5611’. The fishing platform is categorized as usable for fishing opportunities when the water level is sufficient to touch at least the base of the platform.

The Report contradicts itself. At 5611’, the Field Data Sheet, Appendix D, states that the upper fishing platform is 24 feet from the shoreline, putting it into the unusable category. But the narrative states that the platform is usable at 5611’.

Appendix B, “Facility Plan and Profile Pictures” and Appendix C, “Photos,” both confirm the upper platform is unusable at 5611’. Therefore, the platform is usable only from full pool at 5617’ to 5613’. Based on years of local knowledge, the upper platform is unusable for fishing most of the season. Retaining a structure that is only usable for 4 vertical feet seems absurd.

I urge the Forest Service to thoroughly reconsider the benefit of retaining a decidedly useless and inelegant structure. The Recreation and Day Use Area Plans contain actions indicating new ADA compliant pathways will be built to reach the platform, a re-landscaping of the area will occur, and ADA compliant restrooms will be located nearby. Our society should not be memorializing for another 38 years, a useless and ill-conceived hunk of concrete.

Alternatives to Consider: I, and others including the community of interest, should work with the Forest Service to find an alternative location and/or type of facility to

achieve an ADA compliant feature at the Lake. Perhaps there is someplace else along the shore of the Lake to create an observation area/fishing deck, at little expense. The Summit District Trail Crew, who well know the perimeter of the Lake, might be engaged to assist with brainstorming. Creative thinking should be applied to this dilemma.

- 7. PG&E Requests Lower Elevations:** PG&E is currently held to a License condition of no lower than 5608' elevation at Labor Day. Based on the results of the Lake Level Study, PG&E can request modification of this target "minimum Pinecrest Reservoir elevation between End of Spill through Labor Day that protects recreational uses (specifically, Day-Use Area beaches, the marina to just east of the handicap fishing access, and other areas as directed by the State Water Board)." I understand that PG&E is planning to request a target elevation of 5600' in dry-normal dry years, and 5605' in wet-normal wet years.

Neither of these elevations will adequately preserve recreation uses at Pinecrest Lake. Recreational users at Pinecrest Lake enjoy the Lake when it is as full as possible, after early drawdown that creates beach area where people can enjoy the sun or can opt to sit closer along the treeline for shade. Mitigation measures for lower elevations cannot deliver the same experience as exists when the water is held higher. By 5605', the Lake has shrunk to a former slip of itself, and the navigational hazards are extreme.

My opinion of appropriate Lake level is as follows:

5610' at Labor Day;
5608' on October 1.

Thank you for the opportunity to comment on this interesting and well-executed Study. I would only add that the Study didn't include the most important data component: people. People, we the users of Pinecrest Lake, were not asked to contribute our decades of real world recreation experience at Pinecrest Lake.

Sincerely,

/s/ Keri Green

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