

October 23, 2011

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

RE: September 29, 2011 Revised Notice Spring-Gap Stanislaus Hydroelectric Project-  
Pinecrest Reservoir Minimum Lake Level

Dear Ms. Kyler.

Please find this letter as formal comments from Pinecrest Lake Resort regarding the: **September 29, 1011 Revised Notice Spring-Gap Stanislaus Hydroelectric Project- Pinecrest Reservoir Minimum Lake Level**. Pinecrest Lake Resort is a special use permit holder within the Stanislaus National Forest; our facilities include lodging, a commercial center, snack bar, restaurant and marina at Pinecrest Lake.

As we have previously stated, Pinecrest Lake Resort has some concerns with regard to the proposed lake elevations.

1. **Dates of Recreation Season** the proposed date of Labor Day as a mark to the end of the recreation season at Pinecrest Lake is inaccurate. There is a substantial amount of use, from varied user groups which occurs in Pinecrest after Labor Day until well into October. A proposed date of October 1 to achieve desired levels seems more realistic for all parties.

2. **Proposed Lake Elevation** Pinecrest Lake Resort feels it is important for Pinecrest Lake to be kept as high as possible for as long as possible. The increased surface area of the lake provides a safer and more user friendly environment for all user groups. As the lake level drops, especially below 5603 there are numerous obstacles which sit at or just below the surface creating hazards on the entire shoreline, under the surface easily hit by watercraft and making it difficult to access the shore of the lake (a problem for emergency personnel, recreation users, utility workers and cabin owners).

3. **Quality** much has been outlined in the Pinecrest Reservoir Lake Level Study Report about quality. However, there seems to be some missing areas when referring to quality. The report does not make the correlation between the beach quality, shore quality and surface quality. These areas go hand in hand. The lower the lake becomes and thus the lower the beach quality the surface and shore drop as well. Moreover the lesser quality of the surface not only creates obstacles (some visible, some not) it creates a much smaller surface area leading to greater congestion on the surface of the lake. This increases as the swimming area diminishes and will still be a problem even if the swimming buoys are made to be adjustable (though a wonderful idea).

4. **Long Term Planning** it seems appropriate when looking at lake levels to look at the issues further down stream, in this case the infrastructure of the Tuolumne Utilities District (TUD). The current “open ditch system” used by TUD is outdated and causes a drastic amount of water loss. One would assume that when discussing long term lake levels, the infrastructure of the consumptive water district should be analyzed and improved for the benefit of all parties involved.

5. **Consumptive Demand vs. Recreation Use** Pinecrest Lake Resort understands that the consumptive demands are of the utmost importance and recreation use cannot be put first. In the case of Pinecrest Lake and Tuolumne County; recreation use and consumptive demand go hand in hand. Recreation is vital to the economic survival of Tuolumne County and a shorter recreation season or even lack there of creates an undesirable economic environment in the county causing. Which can attribute to loss of jobs and often times leading to individuals to move out of the area, thus leading to less water use. It seems instead of trying to rank consumptive demand and recreation use one ahead of the other they should be considered as contributing factors to one another and a balance achieved. The long term economic survival of the entire county is at stake.

Pinecrest Lake Resort would encourage the SWRCB to look at the lake level of Pinecrest Lake from all perspectives and would encourage a surface elevation as high as possible for as long as possible throughout the season. In addition, we would like to stress the importance of considering a longer recreation season, one that ends October 1 instead of Labor Day.

Best Regards,

Laurie Cashman  
General Manager

