



File Code: 2770
Date: April 15, 2015

Jeffrey Parks
State Water Resources Control Board - Division of Water Rights
Water Quality Certification Program
P.O. Box 2000
Sacramento, CA 95812-2000

Dear Mr.Parks,

Thank you for the opportunity to comment on your Notice of Intent to Adopt a Mitigated Negative Declaration for PG&E's Pinecrest Lake Level Modification Project related to their formal request to modify the Clean Water Action Section 401 water quality certification for the SGS FERC license. My staff has completed their review of the Initial Study and Mitigated Negative Declaration (MND). Based on this review, I offer the comments below along with some additional facts and information for your consideration. (For ease of reference, the itemized numbers and lettering I use below represents the same designation of issue / issue components as used in the MND).

Initial Study / Mitigated Negative Declaration Comments

- 1. Aesthetics:** The MND findings include a determination that there will be Less Than a Significant Impact on the following two Aesthetic issue components: Would the project, a) have a substantial adverse effect on a scenic vista, or c) substantially degrade the existing visual character or quality of the site and its surroundings.

The MND states: "PG&E's proposed project would decrease the elevation of the lake water which would result in an additional few feet of exposed shoreline. The exposed shoreline would not interfere with the views of the nearby mountains." The MND goes on to state, "Given the size of Pinecrest Lake and the small change in elevation (maximum of 8 feet in normal-dry and dry water years), the change to the shoreline that would result due to PG&E's proposed project would generally not be noticeable."

Forest Service Comments: An 8-foot lake level elevation decrease may be more impactful to the shoreline since 8 foot in depth can add up to 100 feet or more of exposed lake bottom. Please refer to Pinecrest Reservoir Lake Level Study Report, Figure 2.4. The illustrated pedestrian access quality shows the 5600' elevation will expose 225 feet of lake bottom (page 26).

The aesthetics and scenic views of Pinecrest Lake are one of the specific reasons the public comes to enjoy the area. In addition to the water itself, the view includes the backdrop of



Pinecrest Lake with the granite mountains and surrounding forest. The foreground – the lake itself - is the most sensitive part of the scenery objective. The desired aesthetic and the recreation experience may be compromised at the proposed lake level of 5600 foot elevation.

- 9a. Hydrology and Water Quality:** The MND findings include a determination that there will be a Less Than a Significant Impact With Mitigation Incorporated on the following Hydrology and Water Quality issue component: a) Would the project violate any water quality standards or waste discharge requirements?
and

- 12. Noise:** The MND findings include a determination that there will be a Less Than a Significant Impact With Mitigation Incorporated on the following two Noise issues: Would the project result in: a) exposure of persons to or generation of noise levels in excess of standards established in any applicable plan or notice ordinance, or applicable standards of other agencies; or d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project (including construction)?

Forest Service Comments: PG&E's proposed project would involve the modification of sediment and /or the removal of large rocks and stumps within the shoreline and from the lake bottom. The MND contains mitigation measures (best management practices) to be implemented during the project to minimize impacts to water quality and to minimize noise impacts (noise control measures). The MND does not recognize/discuss, however, what the long term effectiveness/sustainability of the proposed project is.

The modification of sediment and removal of large rocks and stumps has already been completed for the 5608 to 5610 foot lake level elevation. Based on this effort and observations since, the proposed mitigation may not be sustainable at the 5600 foot elevation without multiple, repeated efforts over the course of the license to maintain the desired condition. Consideration of the proposed project effectiveness and the possible need to consider multiple entries to sustain the identified benefits/conditions may be warranted. Multiple entries may have cumulative effects on water quality and noise considerations.

- 15. Recreation:** The MND findings include a determination that there will be Less Than a Significant Impact With Mitigation Incorporated on the following recreation component: b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Forest Service Comments: The Environmental Setting description of the Recreation component is missing critical and affected elements. The highly used 4 mile National Recreation Trail that provides recreational opportunities around the lake needs to be included and addressed. In addition to the use of the trail itself (hiking, fishing access, scenery enjoyment, photography, etc.), associated facilities include a new picnic area, restroom facility, and boat launch/dock on the east side of the lake.

The MND findings refer to the Pinecrest Reservoir Lake Level Study Report (Study Report).



The Study Report recommends moving the floating buoy string that provides markers for the wading and swimming usable area. PG&E's proposed project includes a plan to adjust the buoyed markers as the lake level drops to maintain the wading and swimming useable area. The study failed to describe the proximity of the buoy line to the launch ramp and the Marina. The buoy line cannot be moved any further into the lake without putting swimmers dangerously close to the launch and marina facilities. The Study Report refers to Available Swimming Area, Criterion 4. On page 63 "As the elevation drops to approximately 5,603 ft., there is no water in the designated buoyed swimming area." The Study considered this severely impaired at approximately 5605 foot elevation. The mitigation to move the buoy line on the south side of the buoy line (nearest the fishing platform), could mitigate the impaired swimming area, however, it then interferes with the mooring of small boats in the adjacent area to the south of the beach buoy line.

Thank you again for the opportunity to comment on the Notice of Intent to Adopt a Mitigated Negative Declaration for PG&E's Pinecrest Lake Level Modification Project. As we enter the 6th year of SGS license implementation, we are mindful of the license complexities and the need to continue to work together with PG&E to ensure that all FERC license conditions are met. With the ongoing low water/drought conditions, our challenge becomes even greater recognizing the connected relationships in Tuolumne County between several different FERC licensees, the various water systems and providers, and the ongoing water needs of our community.

In closing, I have attached a copy of our October 18, 2012 letter regarding this effort soon after the public notice began. At this point in time, the Forest Service will not be seeking a modification to any of the 4e conditions included in the SGS License. Please contact STF Public Service Staff Officer Beth Martinez at (209) 532-3671 x 321 if you have any questions regarding the Forest Service comments provided above or if you need any additional information from us at this time.

Sincerely,



JEANNE M HIGGINS
Forest Supervisor

cc: Molly Fuller, Beth Martinez, Dennis Smith
Rich Doble, PG&E
Tom Scesa, Tuolumne Utilities District

Enclosure

