

From: "Doble, Richard" <RJD2@pge.com>
To: Benvoy@waterboards.ca.gov; sbahm@dfg.ca.gov
CC: pkampa@tuolumneutilities.com; johnb@cserc.org; JParks@waterboards.ca.gov
Date: 6/1/2012 3:17 PM
Subject: FW: comments from CSERC on Pinecrest drawdown and PG&E variance request

Hi Barbra and Sarah,

Mr. John Buckley of the Central Sierra Environmental Resource Center, requested that I forward the Center's email below to you. The Center's email supports the proposed drawdown of Pinecrest Lake to an elevation of 5,606 in order to help the Tuolumne Utility District meet their water delivery obligations for this year only.

If you have any questions please give me a call.

Richard J. Doble
Senior License Coordinator
License Management Team
Power Generation
Pacific Gas and Electric Company
(415)973-4480
From: John Buckley [mailto:johnb@cserc.org]
Sent: June 01, 2012 11:45 AM
To: Doble, Richard
Cc: Beth Martinez; Pete Kampa
Subject: comments from CSERC on Pinecrest drawdown and PG&E variance request

June 1, 2012

From John Buckley, executive director
Central Sierra Environmental Resource Center
Box 396
Twain Harte, CA 95383

To Rich Doble
Senior License Coordinator
PG&E
Mail Code N11C
P.O. Box 770000
San Francisco, CA 94177

Dear Rich:

As a long-time active participant in the relicensing process that spent years considered the management of lake levels at Pinecrest Reservoir, I am aware of the controversy surrounding the competing interests. The State Water Board and the U.S. Forest Service both see high value in maintaining the highest possible lake level until the Labor Weekend in order to best provide scenic and lake recreation benefits for the tens of thousands of recreational visitors who come to the Lake. Officials with the Tuolumne Utilities District strongly assert that the lake is fully adequate for recreation at a lower lake level than is now mandated and that the water use demands of their customers justify dropping the lake lower so as to reduce the need for drastic water conservation measures by TUD customers.

At a public meeting this week where TUD staff and board members discussed this matter for two hours, TUD staff strongly affirmed a desire to have the lake level set for the summer recreation season at a

threshold level lower than is now spelled out in the FERC license conditions and the SWB certification document. You (on behalf of PG&E) are now proposing to drop the lake down to an elevation of 5,606 by Labor Day in order to provide additional water to TUD due to the extremely minimal snowpack this year.

Moving past the question of what the minimum lake level should be for the long-term, I am providing this input for our Center for the proposal to drop the lake level to 5,606. Our non-profit center accepts as reasonable and appropriate the proposal by PG&E on behalf of TUD to draw down the lake to 5,606' during the period through Labor Day. We do not object to that lower lake level due in part to the exceptionally dry spring weather and the lack of any remaining snow pack to refresh Pinecrest and maintain its lake level. We also believe that due to the unusually dry year, the recreating public will generally be accepting of having the Pinecrest Lake level dropped to 5,606, even if some Pinecrest permittees do not support that lower lake level.

Since TUD will be receiving water that the utility district normally would not have access to during the summer recreation period, and since recreational visitors to Pinecrest will have a lower lake as their recreational experience this summer, it appears appropriate to expect TUD to require reasonable conservation measures for their customers (especially large agricultural users) so as to reduce the amount of water that must be drained from Pinecrest. PG&E may not be in any position to require or to oversee such water conservation measures by TUD, but it appears reasonable for the State Water Resources Control Board, the U.S.F.S., and the CA Department of Fish and Game to expect to see serious steps taken by TUD to reduce water use if TUD will be benefitting from a variance from the FERC and SWB conditions.

Again, our Center provides our support for THIS YEAR ONLY for TUD/PG&E to be granted the variance to allow the lake to be drawn down to 5,606' in order to be able to provide 1,500 af of additional water to TUD prior to Labor Day. It is our Center's perspective that the question of the lake level minimum threshold for the long-term needs to be reasonably tied to the efficiency of TUD's water system (or the lack of that efficiency) and to whether or not reasonable water conservation policies and practices can be put in place for long term management of TUD water allocations.

Thank you for the opportunity to comment and to provide support for the requested variance. I would be grateful if these e-mail comments could be forwarded to Barbara Envoy of SWB and Sara Bahm of DFG, since I do not have their e-mail addresses.

Respectfully submitted,

John Buckley, executive director
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