

May 27, 2013

Jeffrey Parks  
State Water Resources Control Board  
Division of Water Rights  
P.O. Box 2000  
Sacramento, CA 958121

Re:FERC #2130

Dear Jeffrey,

The Tuolumne Group of the Sierra Club believes that the value of water being left to flow in rivers at near-natural levels is extremely important for aquatic species and long-term health of the river ecosystem. Water diverted out of the river system should be wisely used and managed.

The Tuolumne Utilities District admits that up to 40% of the water it receives from the South Fork Stanislaus River never reaches a customer. We are concerned that TUD is not making responsible use of water diverted from the river. Allowing so much water each year to be lost to leaks and evaporation is not using the best available technologies and resources of modern water management. To save any significant part of the up to 40% lost would clearly eliminate any need for lowering Pinecrest Lake.

The TUD is using debatable claims to convince County and business groups to pressure the State Water Resources Control Board to give TUD more water by lowering the lake level at Pinecrest. Their website claims, "Water conservation alone cannot get us through dry conditions that will likely occur in the next 30 years." Yet when local media have repeatedly run articles that the snowpack this year is only 50% of normal and that forecasters are calling for exceptionally low snowmelt runoff, TUD has still never notified customers to conserve water. It is pretty revealing that on one hand TUD is claiming that the sky will fall if they can't get more water from Pinecrest, while at the same time choosing not to ask customers to reduce water waste and be more efficient with the water that TUD already has.

When it comes to the debate about whether to keep more water at Pinecrest Lake for recreational use or to instead send the water down the river to be diverted for TUD's commercial/residential demands, the Tuolumne Group feels that a middle ground solution is reasonable and prudent. Allowing a slightly lower minimum Lake level in very dry years may not be positive for recreation, but the needs of TUD customers do need to be considered. However, in order to reduce demands that would lower Pinecrest Lake more than is absolutely necessary, TUD should be required to apply mandatory water conservation measures in years when it gets extra water by lowering Pinecrest Lake.

And finally, the Sierra Club continues to believe that all utility districts, including TUD, should actively adopt strategic planning to apply water conservation measures every year so that water can remain in California's rivers. Based on feedback the Tuolumne Group has received from local Tuolumne County residents, TUD has distanced itself from all but the most minimal water conservation practices and could significantly improve its approach to water conservation.

Thank you in advance for your consideration of this issue.

Sincerely,

Jon M Sturtevant  
Chair, Tuolumne Group of the Sierra Club