



PINECREST PERMITTEES ASSOCIATION

P. O. Box 1248 • Pinecrest, California 95364 • Phone (209) 965-3234

October 17, 2012

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

RE: PG&E request for modification of Labor Day Lake Level at Pinecrest Lake

Mr. Parks-

The Pinecrest Permittees Association [PPA] is a membership owned utility which provides water, sewer, road maintenance, fire protection & emergency services to over 400 Permit holders in the Pinecrest Basin of the Stanislaus National Forest.

PG&E bases its request on the needs of it's customer, the Tuolumne Utilities District [TUD]. The proposed earlier flows will benefit TUD which participated fully in the Stanislaus Planning Action Team [SPLAT] process of 2008-2009. It is our understanding that much of the infrastructure of TUD is an "open ditch system" which causes a dramatic amount of water loss. When discussing long term lake levels the infrastructure of the TUD should be analyzed and improved for the benefit of all parties involved, including the TUD. We believe the goals of the PPA & the TUD are mutual. PPA supports the current staff recommendation. The recommended process performed satisfactorily just this year. The July 24 conservation measures within the TUD ended on September 5 .

We believe the data submitted to diminish the coordination of TUD needs with those of other users is based on inaccurate data.

- The Lake Level Study was incomplete and by no means collaborative.
- Historic lake level data includes low levels prior to 2002 dam repairs.
- Regional growth projections are not reflective of reality.
- Water waste by TUD is high [40% in raw delivery plus 15% in treated delivery].

Since PPA believes recreation is vital to the economic survival of Tuolumne County and a lowered lake level shortens the recreation season. This creates an undesirable economic environment to the county.

Maintaining the seasonal recreation period at Pinecrest Lake to its more common ending [October 1] is to the benefit of the PPA & the TUD. The selection of Labor Day as the end of the season is an anachronistic and arbitrary date selected at one time for convenience. The Lake continues to see extensive visitor use between Labor Day and the middle of October.

A lowered Lake during this mid-summer to October period also has a diminished safety aspect. Maintaining the higher lake level during the summer through the October 1 period provides a safer environment. As the lake level recedes, especially below 5603', there are numerous obstacles which sit at or just below the surface creating hazards to boat borne emergency personnel, recreation users, utility workers and cabin owners. The Pinecrest Permittees Association 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.

I and the Board endorse the well developed process recommended by SWRCB staff which protects all users. The process you have in place obligates all users to understand the needs of their neighbors and fairly responds to those times TUD actually needs additional water.

It was best summarized by one of the presenters at your October 4 workshop; ***fix a leaky bucket before putting more water in it.***

Thank you,

A handwritten signature in blue ink, appearing to read 'Tim Fisher', with a stylized flourish at the end.

Tim Fisher, President
Pinecrest Permittees Association