

Upper Mokelumne River Watershed

Comment	Commenter	Edit to Vol II Made	Response
UPPER MOKELUMNE RIVER WATERSHED			
Lower Bear Area Planning Unit			
<p>[Condensed from letter] Thirdly, the Amador Water Agency has stated that it is considering raising Lower Bear Reservoir Dam to increase storage for future water supply for Amador County. These statements are reflected on UM pages 9 & 13 in Volume II of the Land Conservation Plan. The Agency is forming a partnership with Calaveras County Water District, EBMUD, and Amador Water Agency to conduct the feasibility study to raise Lower Bear Dam. The study will be completed by early next year.</p>	Amador Water Agency	Yes	Comment noted. Text has been added to the report stating that a feasibility study of raising Lower Bear Reservoir Dam to increase storage for future water supply will be completed by early 2008.
<p><i>Include "protecting water quality and supplies" as part of the Recommended Concept Objective.</i></p>	EBMUD	No	As per the Settlement Agreement and Stipulation, PG&E must protect the Watershed Lands with perpetual conservation easements, or some equivalent legal mechanism, to preserve and enhance six Beneficial Public Values (BPVs), of which water resources is not specifically included. Water resources protection was considered in the development of potential measures.
<p><i>Include "Develop a Water Resources Management Plan for the planning unit."</i></p>	EBMUD	No	As per the Settlement Agreement and Stipulation, PG&E must protect the Watershed Lands with perpetual conservation easements, or some equivalent legal mechanism, to preserve and enhance six Beneficial Public Values (BPVs), of which water resources is not specifically included. Water resources protection was considered in the development of potential measures.
<p><i>Revise "Open Space Objective" to read, "Objective: Preserve open space in order to protect natural and cultural resources, viewsheds, water quality and supplies, the recreation setting, and the adjacent wilderness character."</i></p>	EBMUD	No	As per the Settlement Agreement and Stipulation, PG&E must protect the Watershed Lands with perpetual conservation easements, or some equivalent legal mechanism, to preserve and enhance six Beneficial Public Values (BPVs), of which water resources is not specifically included. Water resources protection was considered in the development of potential measures.

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<p>Revise paragraph 1: <i>The Recommended Concept will need to be re-evaluated if the Amador Water Agency proceeds with plans to expand Lower Bear River Reservoir Dam and thereby raise the reservoir level.</i></p>	<p>EBMUD</p>	<p>Yes</p>	<p>Comment noted. The Stewardship Council has been informed by PG&E regarding its Memorandum of Understanding (MOU) obligation to work with the Amador Water Agency (AWA) relative to additional storage. PG&E has informed the Stewardship Council that AWA has sent a letter to PG&E expressing interest in raising Lower Bear and that PG&E and AWA recently met to discuss the first steps in developing a confidentiality agreement. The Stewardship Council will continue to be informed by PG&E regarding status of this effort. Text in Volume II and in the Supporting Analysis for Recommendations has been revised to read: "Recommendations would need to be re-evaluated if the Amador Water Agency develops concrete plans to expand Lower Bear River Reservoir Dam and thereby raise the reservoir level (the 2006 Mokelumne Amador Calaveras Integrated Regional Water Management Plan identifies the reservoir as a future water supply)."</p>
<p>Revise Paragraph 4 to explicitly describe the interests of Amador Water Agency as follows and cite source: <i>"The Amador Water Agency (AWA), in partnership with Amador County, Amador Regional Sanitation Authority, Calaveras County Water District, East Bay Municipal Utilities District, and the Cities of Jackson, Sutter Creek and Plymouth, developed a Mokelumne/Amador/Calaveras Integrated Regional Water Management Plan (MAC IRWMP) that addressed common issues relating to water supply, water quality, flood protection and environmental enhancement. In that adopted MAC IRWMP, the MAC IRWMP partners identified Lower Bear River Reservoir as a future water supply for Amador County, Calaveras County and East Bay Municipal Utilities District areas. Preliminary studies have been conducted at this site. Future uses of the Lower Bear area should consider this resource as a future water supply facility. (2006 Mokelumne Amador Calaveras Integrated Regional Water Management Plan). AWA and Calaveras County Water District have unused senior water rights that require storage to be fully utilized. Calaveras County Water District has an immediate need for a firm water supply. AWA has projected needs for additional water supply by 2030."</i></p>	<p>EBMUD</p>	<p>Yes</p>	<p>Text in Volume II and in the Supporting Analysis for Recommendations has been revised to read: "Recommendations would need to be re-evaluated if the Amador Water Agency develops concrete plans to expand Lower Bear River Reservoir Dam and thereby raise the reservoir level (the 2006 Mokelumne Amador Calaveras Integrated Regional Water Management Plan identifies the reservoir as a future water supply)."</p>

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<p>Revise to read: <i>"Support future Upper Mokelumne River Watershed Authority efforts and include preserving drinking water quality, protecting water supplies, and identifying locations where restoration or protection projects are most critical as management priorities in this planning unit."</i></p>	EBMUD	No	<p>As per the Settlement Agreement and Stipulation, PG&E must protect the Watershed Lands with perpetual conservation easements, or some equivalent legal mechanism, to preserve and enhance six Beneficial Public Values (BPVs), of which water resources is not specifically included. Water resources protection was considered in the development of potential measures.</p>
<p>Revise to read: <i>"Support future Upper Mokelumne River Watershed Authority efforts and include preserving drinking water quality, protecting water supplies, and identifying locations where restoration or protection projects are most critical as management priorities in this planning unit."</i></p>	EBMUD	No	<p>As per the Settlement Agreement and Stipulation, PG&E must protect the Watershed Lands with perpetual conservation easements, or some equivalent legal mechanism, to preserve and enhance six Beneficial Public Values (BPVs), of which water resources is not specifically included. Water resources protection was considered in the development of potential measures.</p>
<p>Cole Creek watershed lands WITHIN the Mokelumne Wilderness The plan's descriptions of the geographical relationship of the watershed lands to the Mokelumne Wilderness are not precise enough. The watershed lands are indeed "adjacent" to the Wilderness, but the descriptions should point out that the wilderness boundary crosses the Cole Creek parcels and that a portion of the watershed lands is not merely adjacent to the Wilderness, but is an inholding within the Wilderness. Acquisition of privately owned lands inside designated wildernesses, which ensures that the wilderness qualities of such lands will not be degraded, is always an important objective of agencies' wilderness management. The recommended future management of the Cole Creek parcels would "complement adjacent Mokelumne Wilderness values", but no details of management prescriptions are given.</p>	John K Moore, Sierra Club	Yes	<p>According to the U.S. Forest Service (USFS) map of the Mokelumne Wilderness, the eastern Cole Creek parcel is indeed an "inholding" within the Wilderness boundary. Text has been revised in the main Volume II document and the Supporting Analysis for Recommendations to reflect this. The measures are intended to be illustrative in nature, not prescriptive. Conservation easements, and overall objectives for management plans, will be developed as part of the disposition process and will be included in the Disposition Packages (Volume IIIs). Specifics of management plans will likely be developed post transaction. The Supporting Analysis for Recommendations states that managing areas bordering the Mokelumne Wilderness: "would include managing recreation as primitive, not allowing motor vehicle use, protecting cultural resources, maintaining a visual quality of preservation (e.g., any trails and other related improvements should be designed to be as obscure as possible), maintaining natural condition of timber stands, and generally preserving the wilderness character of the land."</p>

Public Comments and
Response to Comments on LCP Volume II

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Entry of OHV's into the Wilderness from the watershed lands outside the boundary should be made as nearly impossible as is feasible. Barriers of large boulders should be placed at the Wilderness boundary.	John K Moore, Sierra Club	No	Comment noted. The Stewardship Council has developed a potential measure to manage the Cole Creek parcels to complement adjacent Mokelumne Wilderness values. As the Supporting Analysis for Recommendations states: "This would include managing recreation as primitive, not allowing motor vehicle use..."
Obviously, the best (and indeed the only rational) future disposition of watershed lands inside the Wilderness to "complement adjacent Mokelumne Wilderness values" is to donate these lands to the Forest Service to be managed as directed by the Wilderness Act and Forest Service wilderness management regulations. Forest Service wilderness management provides all the assurances of protection of the relevant beneficial public values that could possibly be desired.	John K Moore, Sierra Club	No	Comment noted. The Stewardship Council is developing an explicit set of criteria that will be used to determine which potential donees are qualified to participate in the disposition process. Qualified donees will be determined during the early stages of developing the Disposition Packages (Volume IIIs). There will be opportunities for the public and stakeholders to engage with the Stewardship Council and other stakeholders on this topic as well as other topics related to the disposition and future management and stewardship of the lands. The Stewardship Council will provide public notice and encourage participation in meetings, workshops, and other appropriate methods of participation in the planning process.
The Cole Creek lands outside the wilderness contain some commercial timber; the national forest lands to the north, south, and west of these lands are managed fairly intensively for timber. The LCP states that the western third of the Cole Creek lands contains valuable timber stands and that future harvests of these stands are planned, which was confirmed by PG&E foresters during a recent field trip. How management by a Sustainable Timber Management prescription can be performed so as to "complement adjacent Mokelumne Wilderness values" is not explained.	John K Moore, Sierra Club	No	Comment noted. Until disposition is complete, PG&E retains management of the lands and can continue managing timber at their discretion, which may not "complement adjacent Mokelumne Wilderness values" as this is a Stewardship Council potential measure for future management. The Stewardship Council's potential measures relating to forestry management are intended to be illustrative in nature, not prescriptive; however, text has been added to clarify that forestry practices on the Cole Creek parcels will need to take into account surrounding Wilderness values. Conservation easements, and overall objectives for management plans, will be developed as part of the disposition process and will be included in the Disposition Packages (Volume IIIs). Specifics of management plans will likely be developed post transaction.

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<p>The Land Conservation Plan recommends “assessing the potential for youth program opportunities” in the Lower Bear Planning Unit. The Cole Creek lands have very low potential for supplying youth program opportunities. The road into the watershed lands is extremely rough and difficult to travel in a low-clearance vehicle. There is some evidence of trails leading into the wilderness, but the trails are obscure and unmaintained, and do not appear to lead to enticing destinations with good campsites. Eldorado National Forest does not acknowledge the existence of any system trails leading into the wilderness from the Cole Creek lands, even infrequently maintained trails. Very few visitors enter the Mokelumne Wilderness from the Cole Creek trailhead.</p>	<p>John K Moore, Sierra Club</p>	<p>Yes</p>	<p>Comment noted. The Stewardship Council is recommending assessing the opportunity of youth environmental education programs on the parcels and is not suggesting the development of programs that would access the larger Mokelumne Wilderness. Text has been added to the Supporting Analysis for Recommendations, however, to indicate that difficult access and unmaintained trails may hinder youth program opportunities. The Stewardship Council is committed to identifying synergies between the Youth Investment Program and the Land Conservation Program, to be determined on a planning unit by planning unit basis, as to what is appropriate in each area. Developing the details regarding where and how these opportunities might be brought forward into implementation will occur during the disposition process, where there will be opportunities for the public and stakeholders to engage with the Stewardship Council and other stakeholders on this topic and others related to future use and management of the lands.</p>
<p>A comment letter will be sent via US mail to your Foster City office address, attention Elise Holland. Please advise if it is not received. Thank you.</p>	<p>Rob Alcott</p>	<p>No</p>	<p>Letter received. Letter contained comments from the Upper Mokelumne River Watershed Authority (see below).</p>
<p>[Condensed from letter] Add the following sentence to the end of the Outdoor Recreation section (p. UM-14): We further recommend that future recreation planning be closely coordinated with Amador Water Agency's efforts to study the potential enlargement of the Lower Bear Reservoir.</p>	<p>Upper Mokelumne River Watershed Authority</p>	<p>Yes</p>	<p>The suggested sentence has been added the Outdoor Recreation section of Volume II.</p>

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<p>[Condensed from letter] Revise the Council's Recommendations statement (p. UM-12, 13) as follows: The Stewardship Council recommends the land and land uses at the Lower Bear Area Planning Unit be preserved and enhanced by focusing on enhanced recreation facilities, and preserving future water supply and hydropower opportunities, while protecting the unique cultural resources, habitat values, and sensitive species present.</p>	<p>Upper Mokelumne River Watershed Authority</p>	<p>No</p>	<p>As per the Settlement Agreement and Stipulation, the conservation easements must honor existing legal agreements, and conservation easements must include "... an express reservation of a right for continued operation and maintenance of hydroelectric facilities and associated water delivery facilities, including project replacements and improvements required to meet existing and future water delivery requirements for power generation and consumptive water use by existing users, compliance with any FERC license, FERC license renewal or other regulatory requirements. In addition, easements will honor existing agreements for economic uses, including consumptive water deliveries." Therefore, as this is a mandate for all of the lands, it is not repeated under every planning unit and thus was not added to the text for the Lower Bear Area Planning Unit.</p>
<p>[Condensed from letter] The specific focus of this comment letter is the extent and sufficiency in which the draft LCP preserves future opportunities for enhanced public benefits associated with the enlargement of the Lower Bear Reservoir. We offer the following comments on LCP Volume II, Lower Bear Planning Unit, in anticipation that the Council's final LCP will better reflect the concerns and interests of the Authority and its member agencies. The last paragraph of the Overview section (p. UM-9) along with the associated footnote 1 (p.UM-15) should be edited to correctly note that the Bear River Reservoirs are sources of water supply for five counties (Alameda, Contra Costa, and San Joaquin, in addition to Amador and Calaveras), and that these reservoirs are also water supply sources for East Bay Municipal Utility District.</p>	<p>Upper Mokelumne River Watershed Authority</p>	<p>Yes</p>	<p>The text has been changed in the Overview section to state that the Bear River Reservoirs provide water supply for five counties, not two. The footnote has also been revised to add the additional three counties and the East Bay Municipal Utility District (EBMUD) as entities which receive water from the reservoirs.</p>