

**SCOPING REPORT FOR THE POTTER
VALLEY HYDROELECTRIC PROJECT
SURRENDER AND DECOMMISSIONING
FEDERAL ENERGY REGULATORY
COMMISSION PROJECT NO. 77
ENVIRONMENTAL IMPACT REPORT**

Prepared for:

**California State Water Resources
Control Board**

Prepared by:

Kleinschmidt Group

Kleinschmidt

**SCOPING REPORT
FOR
THE POTTER VALLEY HYDROELECTRIC
PROJECT SURRENDER AND
DECOMMISSIONING PROJECT
FEDERAL ENERGY REGULATORY COMMISSION
PROJECT NO. 77**

California State Water Resources Control Board

State Clearinghouse Number: 2025091048

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ACRONYMS AND ABBREVIATIONS

C

Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CWA	Clean Water Act

E

ERPA	Eel-Russian Project Authority
ESA	Endangered Species Act
EIR	Environmental Impact Report

F

FERC	Federal Energy Regulatory Commission
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N

NERF	New Eel-Russian Facility
NGO	non-governmental organization
NMFS	National Marine Fisheries Service
NOP	Notice of Preparation and Scoping Meetings for an Environmental Impact Report for the Potter Valley Project License Surrender and Decommissioning

P

PCFFA-IFR	Pacific Coast Federation of Fishermen's Associations, Institute for Fisheries Resources
PG&E	Pacific Gas and Electric Company
Potter Valley Hydroelectric Project	Potter Valley Hydroelectric Project, FERC No. 77
Proposed Project	decommissioning/removal of the Potter Valley Hydroelectric Project developments

S

State Water Board	State Water Resources Control Board
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U

USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), the State Water Resources Control Board (State Water Board) will prepare an Environmental Impact Report (EIR) for the proposed removal of the Potter Valley Hydroelectric Project (Federal Energy Regulatory Commission [FERC] No. 77) (Potter Valley Hydroelectric Project) developments, hereafter referred to as the Proposed Project or the Potter Valley Hydroelectric Project Surrender and Decommissioning Project (as described in Section 2.0 *Project Overview*). The EIR is being prepared to support consideration of Pacific Gas and Electric Company's (PG&E) application for water quality certification related to the proposed surrender of their FERC license and decommissioning of the Potter Valley Hydroelectric Project, including removal of Scott Dam and Cape Horn Dam. The EIR will evaluate potential impacts of the Proposed Project to water quality and other resources within California, as compared to the environmental baseline,¹ and will also evaluate alternatives.

As part of the environmental review process, on September 22, 2025, the State Water Board issued the Notice of Preparation and Scoping Meetings for an Environmental Impact Report for the Potter Valley Hydroelectric Project Surrender and Decommissioning (NOP) (Appendix A). The State Water Board sought written comments over a 42-day public comment period and held four public scoping meetings to provide information on the Proposed Project and solicit input from the public and interested parties. This scoping report documents the scoping process that occurred for the NOP, including the public scoping meetings and all comments received.

1.1 Scoping Purpose and Process

Scoping is generally defined as “early public consultation” and is one of the first steps of the CEQA environmental review process. The purpose of scoping is to involve the public, interested parties, California Native American Tribes, and other resource agencies early in the CEQA process to help determine the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in an EIR, and to eliminate from detailed study, issues found not to be important (CEQA Guidelines § 15083). Scoping has also been found to be “an effective way to bring together and resolve the concerns of affected federal, state, and local agencies, the proponent of the

¹ For CEQA, the current environmental setting—that is, the physical environmental conditions in the vicinity of the project—is normally the baseline the lead agency uses to determine whether an impact is significant.

action, and other interested persons including those who might not be in accord with the action on environmental grounds” (CEQA Guidelines § 15083).

As part of the scoping process, agencies often conduct public meetings. Public meetings allow interested parties to listen to information about a proposed project or action and express their concerns and viewpoints to the implementing agencies. During scoping meetings, the lead agency generally outlines the proposed project, identifies issues to be addressed in the environmental compliance document, and solicits public comments. Agencies also establish a comment period to accept scoping comments submitted in writing. Agencies consider these scoping comments during the formulation of alternatives and use them to determine the scope of the environmental issues the environmental document will address.

1.2 CEQA Scoping Requirements

After the lead agency determines an EIR is required for a project, the lead agency sends a notice of preparation of an EIR to the Office of Land Use and Climate Innovation and each responsible and trustee agency. This notice is also sent to every federal agency involved in approving or funding the project (CEQA Guidelines § 15082(a)).

For a project of statewide, regional, or area-wide significance, the lead agency must conduct at least one scoping meeting and provide notice of the scoping meeting to all of the following (CEQA Guidelines § 15082):

- a. Any county or city that borders on a county or city within which the project is located, unless agreed otherwise
- b. Any responsible agency
- c. Any public agency that has jurisdiction by law with respect to the project
- d. Any organization or individual who has filed a written request for the notice

The State Water Board’s public scoping period began on September 22, 2025, and ended at 4:00 p.m. on November 3, 2025. Four scoping meetings were held during the week of October 13-17, 2025.

2.0 PROJECT OVERVIEW

This section describes the Proposed Project location and background and the alternatives introduced during scoping.

2.1 Project Location

The Potter Valley Hydroelectric Project is located on the Eel River and the East Branch Russian River in Mendocino and Lake counties, California, approximately 15 miles northeast of the City of Ukiah. The majority of the Potter Valley Hydroelectric Project is located on land owned by PG&E (approximately 2,328 acres), with some Potter Valley Hydroelectric Project land surrounding Lake Pillsbury reservoir located on National Forest System lands (1,146 acres) administered by the United States Forest Service, Mendocino National Forest, and privately-owned land (41 acres). The major Potter Valley Hydroelectric Project facilities are shown in [Figure 2-1](#).

The uppermost portion of the 9.2-megawatt Potter Valley Hydroelectric Project includes Scott Dam and the storage reservoir it impounds, Lake Pillsbury reservoir, on the Eel River. Below Scott Dam, the Eel River flows approximately 12 miles to Van Arsdale Reservoir, created by Cape Horn Dam. Cape Horn Dam's fish passage facilities enable salmon, steelhead, and lamprey to access the Eel River and tributary streams between Cape Horn Dam and Scott Dam. There are no fish passage facilities at Scott Dam. At Van Arsdale Reservoir, diverted water is conveyed south by a series of tunnels, conduits, and penstocks to the Potter Valley Powerhouse, while water remaining in the Eel River is released from, or spills over, Cape Horn Dam where it flows northwest approximately 150 miles to the Pacific Ocean. Releases made at Scott Dam ensure spawning and incubation habitat for several special-status and Endangered Species Act (ESA) listed species salmonids between Scott Dam and Cape Horn Dam. Releases made at Cape Horn Dam provide habitat for salmonids including coho salmon, Chinook salmon, and steelhead populations in the Eel River.

The Potter Valley Powerhouse is located in the upper Russian River Watershed, and releases from the powerhouse are a source of water in the East Branch Russian River and for local water users. The Potter Valley Powerhouse discharges into canals used by the Potter Valley Irrigation District for irrigation or into the East Branch Russian River, which flows into Lake Mendocino.² Water from Lake Mendocino is used to meet

² The United States Army Corps of Engineers, in coordination with the Russian River Flood Control and Water Conservation Improvement District and Sonoma County Water

downstream demands for irrigation, municipal and domestic water supply, recreation, and to support habitat for salmon and steelhead populations in the Russian River.

Agency (local sponsor that manages water supply) manages and operates Lake Mendocino.

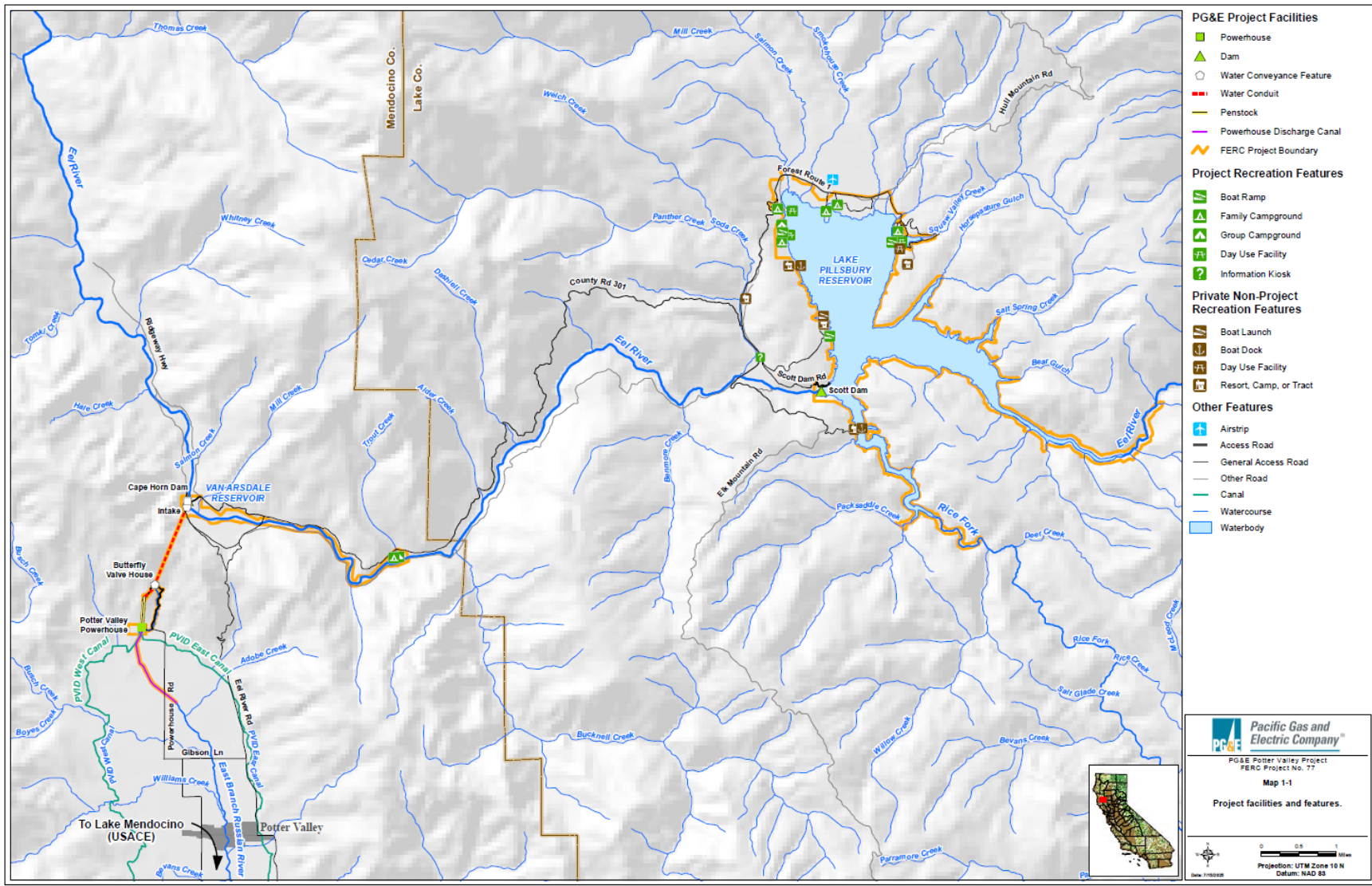


Figure 2-1 General Location of the Potter Valley Hydroelectric Project.

2.2 Background

On November 17, 2023, PG&E distributed an Initial Draft Surrender Application to regulatory agencies, California Native American Tribes, and other interested parties (e.g., local governments, non-governmental organizations [NGOs], and members of the public) to solicit comments on PG&E's approach for the Proposed Project (i.e., decommissioning).

PG&E filed a revised schedule with FERC on June 6, 2024, stating that PG&E would file the final Surrender Application with FERC by July 29, 2025. On July 1, 2024, FERC accepted PG&E's updated schedule.

PG&E distributed the Draft Surrender Application on January 31, 2025, to interested parties (i.e., agencies, California Native American Tribes, NGOs, and interested public) for a 30-day review and comment period. On July 25, 2025, PG&E released the Final Surrender Application for the Project.

As part of the Final Surrender Application, PG&E requests that FERC include a condition in the Surrender Order to remove all lands and Hydroelectric Project works necessary for the New Eel Russian Facility (NERF) from the Hydroelectric Project boundary and FERC jurisdiction after: (1) PG&E's decommissioning work at Cape Horn Dam and other Hydroelectric Project works necessary for the NERF is complete; (2) the NERF has been constructed; and (3) a completion report is filed with FERC on these actions. Please note that this EIR will analyze impacts related to the action proposed for the surrender and decommissioning of the Potter Valley Hydroelectric Project. The State Water Board is not the CEQA lead agency for the New Eel-Russian Facility. The construction, operation, and maintenance of the NERF facility will be analyzed separately by the Eel-Russian Project Authority.

Under Clean Water Act (CWA) Section 401, applicants for federal permits or licenses must seek water quality certification when their activities may cause a discharge into a state's navigable waters (33 U.S. Code § 1341). The State Water Board is the California State agency responsible for CWA Section 401 water quality certifications for proposed activities that involve or are associated with a hydroelectric facility and require a FERC license or amendment to a FERC license (Wat. Code § 13160; Cal Code Regs., tit. 23, § 3855, subd. (b)(1)(B)(2)). PG&E has not yet filed an application for water quality certification. Issuance of a water quality certification for the proposed license surrender is a discretionary action subject to CEQA. The State Water Board has determined it is the CEQA lead agency for PG&E's Proposed Project and will prepare an EIR.

2.3 Alternatives Introduced During Scoping

The State Water Board will evaluate alternatives from the No Project Alternative to removal of the two Potter Valley Hydroelectric Project dam developments. During the scoping process, the State Water Board requested input from the public on the range of alternatives and any suggestions for specific alternatives to the Proposed Project.

Per CEQA Guidelines 15126.6(f), “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”

The NOP indicated that the EIR will evaluate environmental impacts associated with the Proposed Project and the alternatives to the Proposed Project. The NOP included a summary of environmental factors potentially affected by the Proposed Project (Appendix A, pages 8-10).

3.0 NOTICE OF PREPARATION AND SCOPING MEETINGS

3.1 Scoping Meetings

This section provides summary information regarding the scoping meetings. The dates and locations of the four scoping meetings are presented in Table 3-1.

The State Water Board recognizes the complex and controversial nature of the proposed dam removal, that communities along the Eel and East Fork Russian rivers have diverse input to provide, and that travel for community members might be difficult. For these reasons, and to facilitate community input, the State Water Board conducted four scoping meetings, at various locations and times of day, during the NOP comment period.

Table 3-1 Public Scoping Meetings – Dates and Locations.

Fortuna, CA
Tuesday, October 14, 2025 (In-person Only) 6:00 p.m. to 8:00 p.m. River Lodge Conference Center 1800 Riverwalk Drive Fortuna, CA 95540
Ukiah, CA
Wednesday, October 15, 2025 (In-person Only) 11:30 a.m. to 1:30 p.m. Ukiah Valley Conference Center, Cabernet 1 and 2 Rooms 200 South School Street Ukiah, CA 95842
Santa Rosa, CA
Wednesday, October 15, 2025 (In-person Only) 5:30 p.m. to 7:30 p.m. North Coast Regional Water Quality Control Board Office DCJ Hearing Room 5550 Skylane Boulevard, Suite A Santa Rosa, CA 95403
Sacramento, CA
Friday, October 17, 2025 (In-person and Virtual) 12:30 p.m. to 2:30 p.m. CalEPA Building, Byron Sher Auditorium 1001 I Street, 2nd Floor Sacramento, CA 95814 <i>and</i> Via Zoom: https://waterboards.zoom.us/j/86984608826 Call in number: +1 669 444 9171 US, Meeting ID: 869 8460 8826

The Sacramento public scoping meeting included an in-person and virtual option via Zoom, was recorded, and was streamed live on YouTube. During the meeting and live stream, participants were invited to submit comments via electronic mail to:

wr401program@waterboards.ca.gov or Wilhelmina.Chon@waterboards.ca.gov.

A video recording of the Sacramento scoping meeting is available online at:

<https://youtu.be/hiTbGhAS49M>

The NOP originally included three public scoping meetings; however, after the NOP was submitted, interested parties requested an additional scoping meeting in the Lower Eel River (Appendix B). On September 30, 2025, State Water Board staff provided notice that an additional public scoping meeting was added in Fortuna, California, in Humboldt County (Appendix C).

3.1.1 Notice of Preparation

The State Water Board exceeded³ the CEQA notification requirements (CEQA Guidelines 15082 and 15083). On September 22, 2025, the State Water Board mailed hard copies of the NOP via U.S. Postal Service to the following entities:

- 39 responsible, trustee, and federal agencies
- 14 cities and counties
- Mendocino, Lake, Humboldt, Trinity, and Sonoma County clerk offices
- Tribes on the California Native American Heritage Commission list:
 - Cachil Dehe Band of Wintun Indians of the Colusa Indian Community, Cloverdale Rancheria of Pomo Indians, Cortina Rancheria - Kletsel Dehe Band of Wintun Indians, Grindstone Rancheria of Wintun-Wailaki, Guidiville Rancheria of California, Habematolel Pomo of Upper Lake, Manchester Band of Pomo Indians of the Manchester Rancheria, Noyo River Indian Community, Pinoleville Pomo Nation, Shasta Nation, Wiyot Tribe, Yokayo Tribe, and Yurok Tribe

³ CEQA Guideline 15082 states that the NOP must be distributed to each responsible and trustee agency, filed with the county clerks of each county that the project is in, and distributed to and filed with every federal agency involved with funding the project. CEQA Guideline 15083 states that, prior to completing the draft EIR, the Lead Agency may consult with any person or organization that it believes will be concerned with the environmental effects of the project. The State Water Board distributed the NOP to many interested organizations and individuals, as described in Section 3.1.1.

On September 22, 2025, the State Water Board distributed electronic copies of the NOP via email to the following Tribes on the California Native American Heritage Commission list:

- Bear River Band of Rohnerville Rancheria, Big Lagoon Rancheria, Big Valley Band of Pomo Indians of the Big Valley Rancheria, Blue Lake Rancheria, Cachil Dehe Band of Wintun Indians of the Colusa Indian Community, Cahto Tribe, Cher-Ae Heights Indian Community of the Trinidad Rancheria, Coyote Valley Band of Pomo Indians, Dry Creek Rancheria of Pomo Indians, Elem Indian Colony Pomo Tribe, Elk Valley Rancheria, Estom Yumeka Maidu Tribe of the Enterprise Rancheria, Guidiville Rancheria of California, Habematolel Pomo of Upper Lake, Hoopa Valley Tribe, Hopland Band of Pomo Indians, Karuk Tribe, Kashia Band of Pomo Indians of the Stewarts Point Rancheria, Koi Nation of Northern California, Middletown Rancheria of Pomo Indians of California, Mishewal-Wappo Tribe of Alexander Valley, Paskenta Band of Nomlaki Indians, Potter Valley Tribe, Pulikla Tribe of Yurok People (formerly Resighini Rancheria), Quartz Valley Indian Community, Redwood Valley or Little River Band of Pomo Indians, Robinson Rancheria of Pomo Indians, Round Valley Reservation/ Covelo Indian Community, Scotts Valley Band of Pomo, Shasta Indian Nation, Sherwood Valley Rancheria of Pomo, Tolowa Dee-ni' Nation, Tsnungwe Council, Wiyot Tribe, and Yocha Dehe Wintun Nation

In addition, on September 22, 2025, State Water Board staff posted the NOP on its Potter Valley Hydroelectric Project webpage and sent notification to all interested parties on the Federal Energy Regulatory Commission's Service List and the State Water Board's "Water Rights Water Quality Certification" email subscription lists.

Following distribution of the NOP, the State Water Board received two requests from interested parties to hold a public scoping meeting in Humboldt County to facilitate local attendance. The written requests are included in Appendix B. As described above in Section 3.1 *Scoping Meetings*, an additional meeting in Humboldt County (Fortuna, California) was held per request.

3.1.2 Newspaper Advertisements

To facilitate public input during the NOP public comment period, the State Water Board posted information regarding the scoping meetings in the following local newspapers:

- The Press Democrat (published September 25, 2025)
- Sacramento Bee (published September 25, 2025)
- Ukiah Daily Journal (published September 25, 2025)

Proof of publication for the newspaper advertisements are included in Appendix D.

3.1.3 Website

The State Water Board's Potter Valley Hydroelectric Project webpage is:

https://www.waterboards.ca.gov/waterrights/water_issues/programs/water_quality_cert/potter_valley_ferc77.html

3.2 Scoping Meeting Format and Content

This section describes the public scoping meeting format and content.

3.2.1 Agenda

The scoping meetings began with comment cards available at the door, where attendees were asked to provide their name and affiliation if they wanted to provide a comment. The State Water Board then gave a formal presentation (Appendix E) followed by a public oral comment period. Each scoping meeting continued until all public participants who wanted to provide oral comments had the opportunity to speak.

3.2.2 Meeting Materials

The State Water Board made meeting materials available to the public at each of the scoping meetings. These meeting materials included the following:

- A speaker/comment card for individuals who wanted to provide written or oral comments during the scoping meetings
- Copies of the NOP (upon request)
- Copies of the visual (i.e., PowerPoint) presentation (upon request)

The scoping meeting materials provided are included in the appendices. Transcripts from the meetings are included in Appendix F.

3.3 Staff

Table 3-2 lists the agency and consultant staff that attended each of the four public scoping meetings.

Table 3-2 State Water Board and Consultant Staff that Attended Public Scoping Meetings.

Fortuna, CA	
Erin Ragazzi	State Water Board
Nathan Fisch	State Water Board
Wilhelmina Chon	State Water Board
Parker Thaler	State Water Board
Dana Heinrich	State Water Board
Shannon Luoma	Kleinschmidt Associates
Carissa Shoemaker	Kleinschmidt Associates
Ukiah, CA	
Erin Ragazzi	State Water Board
Nathan Fisch	State Water Board
Wilhelmina Chon	State Water Board
Parker Thaler	State Water Board
Dana Heinrich	State Water Board
Shannon Luoma	Kleinschmidt Associates
Carissa Shoemaker	Kleinschmidt Associates
Santa Rosa, CA	
Erin Ragazzi	State Water Board
Nathan Fisch	State Water Board
Wilhelmina Chon	State Water Board
Parker Thaler	State Water Board
Dana Heinrich	State Water Board
Carissa Shoemaker	Kleinschmidt Associates
Sacramento, CA	
Erin Ragazzi	State Water Board
Nathan Fisch	State Water Board
Wilhelmina Chon	State Water Board
Parker Thaler	State Water Board
Dana Heinrich	State Water Board
Allison Rabe	State Water Board
Carissa Shoemaker	Kleinschmidt Associates

4.0 SCOPING COMMENT SUMMARY

This section presents a summary of all comments received by the State Water Board. As described in Section 1.0 *Introduction*, the scoping comments are considered by the lead agency in determining the scope of the EIR analyses.

4.1 Scoping Comment Overview

The State Water Board received 35 oral and 22 written comments during the public scoping meetings ([Table 4-1](#)), as well as 76 written comments submitted via email, four voicemails, and four postcards, for a total of 141 comments. Of the 81 written comments (email and postcards), 63 were received by November 3, 2025, and 18 comments were received after the close of the comment period; however, the State Water Board will consider all comments referenced in this report in its development of the EIR. Entities from federal, state, local, and California Native American Tribal governments, organizations, and individuals who provided written comments are listed in Table 4-2 through Table 4-55. Individuals that provided oral comments during the scoping meetings are listed in Table 4-6 along with their affiliation, as appropriate.

Table 4-1 Locations, Dates, and Number of Comments Received at Public Scoping Meetings.

Location	Date	Number of Oral Comments	Number of Written Comments
Fortuna	October 14, 2025	11	12
Ukiah	October 15, 2025	12	6
Santa Rosa	October 15, 2025	6	4
Sacramento	October 17, 2025	6	0
	Total	35	22

Table 4-2 Written Comments Received from California Native American Tribes.

Name	Affiliation
Mike Shaver	Potter Valley Tribe
Joseph Parker	Round Valley Indian Tribes

Table 4-3 Written Comments Received from Governmental Entities.

Name	Affiliation
State	
Tina Bartlett	California Department of Fish and Wildlife
Dan Gjerde	California Department of Transportation

Name	Affiliation
Valerie Quinto	North Coast Regional Water Quality Control Board
Local	
David Manning	Eel-Russian Project Authority
Hank Seemann	Humboldt County
Jeannie Fulton	Humboldt County Farm Bureau
Jennifer Burke	City of Santa Rosa
Kevin Thompson	City of Cloverdale
Lloyd Guintivano	County of Lake (Lake County)
Natalie Arroyo	Humboldt County, Klamath River Renewal Corp.
Sean White	City of Ukiah

Table 4-4 Written Comments Received from Organizations.

Name	Organization
Alan Levine	Coast Action Group (Redwood Coast Watersheds Alliance)
Alicia Hamann; Samantha Kannry; Mark Rockwell; Scott Harding; Alicia Bales	Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, Redwood Chapter Sierra Club
Carol Cinquini	Lake Pillsbury Alliance
Charlie Schneider	California Trout
Charlie Schneider; Matt Clifford	California Trout; Trout Unlimited
Dan Silver	Endangered Habitats League
Daniel Chandler	350 Humboldt/Climate Action California
GU Gives Team	GU Gives
Kelsey Machado	Rio Dell Community Garden
Lisa Damrosch	Pacific Coast Federation of Fishermen's Associations, the Institute for Fisheries Resources (PCFFA-IFR)
Regina Chichizola	Save California Salmon
Regina Chichizola; Keiko Mertz; Chris Shutes	Save California Salmon; Friends of the River; California Sportfishing Protection Alliance
Richard Brazil	Save Potter Valley Project
Scott Harding	American Whitewater
Vivian Helliwell; Harrison Ibach	Salmon Returning, Humboldt Fishermen's Marketing Assoc.
Vivian Helliwell; Harrison Ibach; Andy Colonna	Salmon Returning, Humboldt Fishermen's Marketing Assoc., California Sportfishing Protection Alliance

Table 4-5 Written Comments Received from Individuals.

Name	Name
Adriana Narro	Julia Carrera
Alison Gardner	Karen Jacques
Amanda Moran	Kate McClain
Andrew Nicoll	Kent Iverson
Andy Colona	Kim Turnage
Ann Dorsey	Kristin Womack
Ann Kilby	Kylin DeWolf
BB Kamoroff	Launa Wyrnd
Carissa Clark	Leslie Leach
Carl Tilchen	Lou Sandler
Carol Schaffer	
Cena Marino	Matt Richardson
Charles Sharpe	Melissa Mack Barker
Christian Masuda	Michele Grgich
Colleen Broderick	
Constance Titterton	Nancy Todd
Daniel Burval	Neil Hancock
David Sopjes	Patrick Carr
Davin Peterson	Patrick Ward
Doug Carroll	Pavel Prokopchuk
Duncan James	Pete Halstad
Ed Nickerman	Rachel Harris
Eric Stockwell	Ren Brownell
Ernest Merrifield	Richard Maas
Fred Schardt	Rue Furch
Freya Sylvester	Sharon Paltin
Gisele Albertine	Stephen Rosenberg
Hollie Smith	Stephen Welling
James Haufler	Steven Elliott
James Pretorius	Sue Lee Mossman
Jerry Albright	Suzanne Zechiel
John Almida	Sylvia S.
John Lee	Tim Burwell
Joseph Biben	Wendy Krupnick
Joyce King	William Spita
Judith Borcz	Wilma Keeney

Table 4-6 Individuals that Provided Oral Comments at Public Scoping Meetings.

Name	Affiliation/Organization
Fortuna	
Cena Marino	Private Citizen
Darren Mierau	California Trout
Eric Stockwell	Private Citizen
Launa Wyrnd	Private Citizen
Marisa McGrew	Assistant Natural Resources Director for Wiyot Tribes
Natalie Arroyo	Humboldt County, Klamath River Renewal Corp.
Regina Chichizola	Save California Salmon
Ren Brownell	Private Citizen
Scott Gracean	Friends of the Eel River
Stephen Rosenberg	Private Citizen
Vivian Helliwell	Salmon Returning, Humboldt Fishermen's Marketing Assoc.
Ukiah	
Andrew Nicoll	Private Citizen
Dakota Perez	Yurok Tribe member
Duncan James	James & McMullen, LLP
Frank Lynch	Lake Pillsbury Alliance
James Russ	Representative of the Round Valley Indian Tribes
Jeannie Fulton	Humboldt County Farm Bureau
John Almida	Private Citizen
Julia Carrera	<u>Lake County District 3 Supervisor Candidate</u>
Mike Shaver	Potter Valley Tribe
Nancy Todd	Private Citizen
Nikole Whipple	Save California Salmon
Pete Halstad	Private Citizen
Santa Rosa	
Joseph Byron	Ukomno'm member
Neil Hancock	Private Citizen
Richard Maas	Private Citizen
Rue Furch	Private Citizen
Stephen Welling	Private Citizen
William Spita	Private Citizen

Name	Affiliation/Organization
Sacramento	
Abigail Black	Save California Salmon
Emily Wood	Reentry Opportunities and Access to Resources
Glen Spain	PCFFA-IFR
Nikole Whipple	Member of Round Valley Indian Tribes
Regina Chichizola	Save California Salmon
Sarah Bates	Commercial fisherman, PCFFA-IRA

4.2 Comment Summary

This section summarizes comments received in response to the NOP. Comments are generally organized by subject area. Some comments covered multiple subjects/topics, and their placement in one area does not reflect a lack of recognition of the comment's relevance to other areas. If the comment was made by a governmental entity, a California Native American Tribe, or an organization, the entity, California Native American Tribe, or organization is often identified along with the comment, particularly for the broad categories of overall EIR scope (Section 4.2.1), environmental baseline (Section 4.2.2), the No Project Alternative (Section 4.2.4), and other Project Alternatives suggested during scoping (Section 4.2.5).

4.2.1 Overall EIR Scope

Several comments were submitted on the overall scope of the EIR.

- Several commenters emphasized that any proposed diversions should be considered and scoped as separate projects.
- Several commenters requested that the geographic scope of the EIR should extend to the Eel River estuary to encompass the entire watershed.
- Humboldt Fisherman's Marketing Association, Salmon Returning, California Sportfishing Protection Alliance commented that the affected area analyzed in the EIR should include the entire mainstem Eel River (starting with the headwaters feeding into Lake Pillsbury), the estuary, and the adjacent nearshore marine area.
- Two commenters stated that the EIR scope should be limited to areas impacted by the dam removal.
- The City of Santa Rosa suggested that the scope of the EIR include the entire Russian River basin and biological resources in the ocean that rely on Russian River resources.
- Lake Pillsbury Alliance stated that the EIR must evaluate impacts in all affected areas. For example, groundwater impacts and firefighting impacts will not be

limited to areas immediately adjacent to the Proposed Project boundaries. Lake Pillsbury Alliance noted the EIR must identify and require the implementation of all feasible mitigation measures, to include:

- Impacts on groundwater wells
- Impacts on water reliability and cost
- Impacts on water supplies for firefighting
- Impacts on transportation
- Impacts on communication infrastructure
- Impacts on recreation
- Biological impacts
- California Department of Fish and Wildlife (CDFW) recommended the scope of the EIR cover the following:
 - A complete assessment of the flora and fauna with and adjacent to the Proposed Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.
 - A thorough discussion of the Proposed Project's direct, indirect, and cumulative impacts that could adversely affect biological resources and specific measures to offset such impacts.
 - Avoidance, minimization, and mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts to biological resources, to the extent feasible.
 - Potential impacts to lake, river, and riparian resources, also providing adequate avoidance minimization, monitoring, and reporting commitments.
 - Proposed Project impacts to California Endangered Species Act (CESA) protected species, also specifying the mitigation monitoring and reporting program that will meet the requirements of Fish and Game Code § 2081.
- Round Valley Indian Tribes emphasized the need for the EIR to include comprehensive analysis of impacts on tribal cultural resources including tribal beneficial water uses, and stated that entire river segments may qualify as tribal cultural resources depending on their significance.
- Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance urge the State Water Board to address the following elements in the EIR, which are discussed under the individual topics below:
 - Sediment and water quality management
 - Cumulative downstream impacts

- Analysis of impacts of dam removal and increased flows on nuisance algal blooms and biostimulatory impacts
- Need for mitigation for movement of heavy metals
- Tribal consultation and cultural resource protection
- Restoration of fish passage and habitat connectivity
- Enforceable mitigation and adaptive management
- Recreation and aesthetic impacts
- Safety and short mitigations until dams are removed
- Invasive fish and water quality
- Real-time data and transparent communications

4.2.2 Environmental Baseline

Several comments were submitted regarding the environmental baseline to be used in the EIR.

- Many commenters requested that the current Potter Valley Hydroelectric Project flows should be considered the environmental baseline for the EIR analysis.
- The Lake Pillsbury Alliance emphasized that the EIR should be based on an accurate description of existing conditions for all impacted resource areas including local economic activity associated with recreation, tourism, and property use at Lake Pillsbury. Baseline data must reflect existing climate trends, water supply conditions, and the fire-risk context in Mendocino and Lake counties.

4.2.3 Proposed Project

General comments were submitted regarding the Proposed Project.

- Many commenters offered their support for dam decommissioning and removal and noted that short-term impacts of dam removal will be outweighed by positive long-term benefits to the ecosystem/watershed.
- Several commenters stated that the Proposed Project would be a mistake and that there would be significant unavoidable adverse impacts if dams are removed.
- Several commenters expressed concerns about both short-term and long-term Proposed Project impacts to resources and noted that these impacts need to be mitigated for and monitored in the long-term. For example, the reservoir drawdowns should be timed appropriately to limit impacts to resources. Long-term resource management plans will need to be developed.

- In support of dam removal, several commenters stated that the existing dams are not currently serving a purpose.
- Many commenters emphasized the need for urgency in the EIR process to facilitate an expedited decommissioning timeline. One commenter suggested striving for a 1-year timeframe for the EIR process.
- Eel-Russian Project Authority (ERPA) suggested that the Proposed Project's Non-Project Use of Project Lands requested by PG&E should be expanded to allow ERPA to construct NERF concurrent with the removal of Cape Horn Dam. ERPA's EIR will address direct and indirect impacts of NERF.
- Several commenters requested that PG&E develop a restoration plan for the entire basin to ensure full ecological restoration. Several comments implied that dam removal would restore the Eel River and revitalize the entire watershed.
- CDFW recommended that the EIR consider the future decommissioning of facilities within the Proposed Project area that may remain after the Proposed Project is implemented and describe remedial efforts to restore habitat after the facilities are removed.
- The City of Santa Rosa and Lake Pillsbury Alliance stated that the EIR should include both decommissioning the Potter Valley Hydroelectric Project and construction and operation of NERF, which would be the "whole of the action." The EIR should accurately describe the Proposed Project with NERF. The State Water Board's EIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the "whole of the action," including Potter Valley Hydroelectric Project decommissioning, construction of NERF, and long-term operation and maintenance of the Proposed Project.

4.2.4 No Project Alternative

- Lake Pillsbury Alliance stated that the EIR should review a No Project Alternative. Lake Pillsbury Alliance requests a thorough, unbiased evaluation of the No Project Alternative, which would reduce many of the impacts that will severely affect the communities in the Proposed Project area.

4.2.5 Other Project Alternatives Suggested During Scoping

The following comments suggested consideration of alternatives to the Proposed Project:

- CDFW stated that the EIR should analyze a range of Proposed Project Alternatives.

- Several commenters, including Save Potter Valley Project, stated that the existing dams could be improved as an alternative.
- Several commenters, including Lake Pillsbury Alliance, stated that the FERC decision should be stayed until all alternatives have been reviewed by an independent federal oversight committee.
- Two commenters noted that the money appropriated for Proposed Project dam removal should instead be spent on habitat restoration elsewhere.
- One commenter suggested installation of a state-of-the-art fish transport system and retooling the lake [Pillsbury] to a pumped storage green power generation project similar to the Helms Hydroelectric Project (FERC No. 2735).
- One commenter stated that the NERF project would be “stealing water from the Eel River unlawfully.”
- Humboldt Fisherman’s Marketing Association, Salmon Returning, California Sportfishing Protection Alliance stated that the Proposed Project and NERF must be analyzed separately in the EIR, so that timely dam removal is not reliant on completion of NERF, which may or may not happen, depending on funding availability that has yet to be determined.
- The City of Cloverdale stated that the EIR must analyze alternatives to the Proposed Project including alternative designs, which may include preserving certain components of the Potter Valley Hydroelectric Project that are proposed for demolition.
- Save Potter Valley Project requests the State Water Board conduct a full and comprehensive review of the Proposed Project surrender under both CEQA and the CWA; this will ensure that the EIR evaluates all feasible alternatives that preserve regional water reliability, public health and safety, and agricultural and domestic livelihoods, including license surrender without decommissioning of the Potter Valley Hydroelectric Project.
- Save Potter Valley Project stated the EIR should analyze an Improved Reservoir Alternative that maintains and, where feasible, increases storage capacity at Scott Dam to safeguard socioeconomic, health, and environmental stability while ensuring sufficient impoundment for summer diversions to Potter Valley, Lake Mendocino, and year-round reliability for both the Russian and Eel river valleys. This alternative should also incorporate engineered fish-passage and sediment-release structures at Cape Horn Dam, meeting ecological standards without removing the diversion function vital to regional agriculture, domestic wells, and municipal systems.
- Save Potter Valley Project suggested several Proposed Project Alternatives:
 - Rehabilitation of Scott Dam

- Improvements to Cape Horn Dam
- Increase height of Cape Horn Dam
- Groundwater and recharge impact evaluation
- Concurrent mitigations
- Lake County suggested several Proposed Project Alternatives:
 - Maintain the current operations of the Scott Dam but retrofit the dam with a fish ladder
 - Lower Scott Dam with a fish ladder
 - Reduce reservoir with Salmon Creek as the main tributary
 - Dam removal with off-channel pond restoration

4.2.6 Fish and Fisheries

Many comments submitted were related to fish and fisheries resources.

- Many commenters discussed general fish habitat, salmon habitat, and fish populations in their comments.
- Several commenters expressed their concerns regarding existing and future threats to the remaining fish populations in the watershed.
- Many commenters emphasized their concerns and the importance of ocean-based and commercial fisheries to the region.
- Several commenters noted that fish passage should be improved on the existing dams.
- Many commenters expressed the great importance of fish/fisheries resources in the Eel River to the ecosystem and residents.
- Several commenters supported the removal of passage barriers to improve fish spawning habitat.
- One commenter stated removal of the Eel River dams will contribute to the recovery of salmon and steelhead populations in the upper mainstem, especially in reaches above Scott Dam.
- Lake Pillsbury Alliance noted that the EIR must fully evaluate and disclose effects of dam removal on fish passage, spawning, and habitat conditions, including upstream restoration potential and downstream disruption.
- One commenter stated that the decline in the salmon population is not the fault of dams or farmers.

- Two commenters suggested a fish hatchery should be established to help stock the Eel River.
- One commenter stated that volitional fish passage at Van Arsdale Reservoir/Cape Horn Dam is needed.
- Several commenters noted that fishing in the Eel River watershed should be stopped entirely until the populations have fully recovered.
- Two commenters stated that removing the Potter Valley Hydroelectric Project dams will threaten fish populations. The City of Cloverdale stated the reservoirs are important for numerous protected biological species and habitats, especially fish.
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club stated that ESA-listed salmonids are being taken unlawfully because the Potter Valley Hydroelectric Project does not have an incidental take authorization with the National Marine Fisheries Service (NMFS).
- Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance stated that the water quality impairments from the Potter Valley Hydroelectric Project dams have led to the majority of salmonid species in the Eel River being listed under the ESA or being extirpated from the river.
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club noted that increased traffic due to Proposed Project implementation is unlikely to be significant. These commenters suggested a mitigation measure to minimize the use of construction vehicles with tires (e.g., use tracked vehicles instead) near the river channels because of a preservative compound in tires that has been linked to salmonid mortality.

4.2.7 Water Quality

Many commenters noted concerns about current and future water quality in the rivers and reservoirs in the Proposed Project area and vicinity.

- Comments generally described water cleanliness, turbidity, low dissolved oxygen, high water temperatures, overgrowth of toxic algae, and total maximum daily loads.
- Several commenters stated that dam removal will alleviate the adverse temperature effects of the reservoirs (e.g., increased summer/low flow temperatures) on the downstream river.

- Two commenters suggested that the water quality analysis in the EIR should be based on pre-Potter Valley Hydroelectric Project conditions.
- One commenter stated that the EIR should include a review of known contaminants in water and sediments in both the Eel and Russian river watersheds. The Potter Valley Tribe found arsenic in 2024 surface water sampling of Lake Pillsbury, mainstem Eel River at Trout Creek confluence, and in the East Fork of Russian River Tribal property in the village of Potter Valley. The Tribe's Tribal Environmental Office monitors water quality and samples for water pollutants in the mainstem Eel River and East Fork Russian River following the Tribe's United States Environmental Protection Agency (USEPA)-approved Quality Assurance Project Plan, and results can be found on the USEPA WQX database in the Potter Valley Tribe 2024 report. The Tribe requests that the State Water Board CWA Section 401 certification include Proposed Project requirements for the sampling and testing of both Lake Pillsbury and Van Arsdale Reservoir sediments for arsenic and surface water monitoring of arsenic levels throughout the dam removal procedure and following 3 years.
- Several commenters urged the Proposed Project to deliver on PG&E's promise of clean water.
- Several commenters urged the Proposed Project to deliver on their promise to promote a resilient watershed into the future.
- Several commenters expressed concerns about mercury accumulation in reservoirs, in both fish and sediment.
- Two commenters stated that there is degraded water quality from the cannabis industry.
- Two commenters described the ecological benefits of winter flushing flows.
- Several commenters noted that additional planning and analysis is needed for long-term water quality monitoring, especially turbidity.
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club stated that the Potter Valley Hydroelectric Project is currently in violation of the ESA with the existing water quality issues.
- The North Coast Regional Water Quality Control Board stated that during and after dam removal, drinking water quality could be temporarily adversely impacted and water quality standards could be temporarily violated.
- Several commenters, including Humboldt County, stated that dam removal will result in temporary downstream water quality impacts that may be unavoidable, such as increased turbidity. These impacts may cause temporary exceedances of water quality objectives.

- Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance suggested the EIR evaluate how the Proposed Project will protect against algal blooms and methylation of mercury. The analysis and an associated management plan should include modeling of post-removal nutrient dynamics, dissolved oxygen, and algal growth potential, along with adaptive management measures to prevent water quality impacts during the recovery period.

4.2.8 Water Supply

Several comments received described the potential for dam removal effects on water supply.

- Many comments expressed concern about the lost water supply if Lake Pillsbury is drained and asserted that the EIR must evaluate effects on water supply reliability for the Russian River communities and agricultural users.
- Many comments expressed concern about the decrease in downstream flows in the Russian River and associated communities if the Proposed Project goes ahead. Other associated negative impacts in the downstream Russian River were also noted if the flows decrease. The City of Ukiah noted that the restriction of Eel River water into the Russian River results in insufficient water to support appropriate water rights holders in most months of the year, even in the above-normal years experienced lately.
- The City of Cloverdale stated all the direct and indirect adverse impacts to the City water supply must be thoroughly analyzed and their level of significance disclosed in the EIR. The loss of the water diversion from the Potter Valley Hydroelectric Project into the Russian River will have a significant impact on the City of Cloverdale's water supply reliability. The Proposed Project will result in lower Russian River flows, especially during drought years. With the removal of the Scott Dam and Cape Horn Dam and other infrastructure under the Proposed Project, the water diversions from the Eel River to the Russian River will be eliminated, resulting in a significant risk of reduction to the City's water supply, especially during the summer and drought conditions.
- Several commenters noted that there needs to be more water in the Eel River, especially to support salmon populations.
- One commenter stated they believe that an increase in surface water storage is not being pursued aggressively because of the overwhelming opposition from minority preservation and environmental organizations.
- Save Potter Valley Project and Lake County stated that domestic wells in the Proposed Project area need to be protected.

- The North Coast Regional Water Quality Control Board and Lake County stated that during and after dam removal, drinking water supply could be temporarily impacted.
- The City of Santa Rosa stated the EIR should fully and accurately describe the potentially significant impacts to water supply in the Russian River basin. These include the potential for adverse impacts on Lake Mendocino's operations, effects on the future ability to achieve instream flow compliance for the protection of threatened and endangered species, impacts to municipal diversions downstream, and the potential for redirected impacts on other supplies from Lake Sonoma to mitigate the loss of supplies in Lake Mendocino.
- Save Potter Valley Project stated that CEQA mandates analysis of all significant environmental effects, including groundwater depletion and water-supply reduction (Pub. Res. Code § 21000 et seq.), and that failure to include Potter Valley and Russian River groundwater analysis would render the EIR legally deficient.

4.2.9 Water Rights

Several comments received expressed concerns about water rights in the Proposed Project area.

- Several commenters stated that the water in the Eel River belongs to the Eel River, not the Russian River, so there should be no more diversion of water into the Russian River.
- The City of Santa Rosa and City of Ukiah both commented on the Water Diversion Agreement that provides for the continued diversion of Eel River water into the Russian River watershed.
- One commenter noted that the Potter Valley Hydroelectric Project's current inter-basin diversion of water rights would not be approved today.
- One commenter noted that the people's share of developed water storage, for people and agricultural uses, must be protected.
- Several commenters discussed general water rights of people and communities along the Eel River.
- One commenter discussed general water rights of people and communities along the Russian River.

4.2.10 Hydrology

Many comments were focused on the potential effects of dam removal on hydrology in the Proposed Project area and vicinity.

- Several commenters discussed the potential benefits that a restored natural hydrograph could provide if dams are to be removed.
- Several commenters described the hydrologic restoration of the entire Eel River and estuary that could occur if dams are removed.
- Lake Pillsbury Alliance noted that the EIR should evaluate changes in flow regimes in the Eel River and Russian River.
- Two commenters, including Save Potter Valley Project, noted that groundwater recharge should be evaluated for the Proposed Project area in the EIR.
- The City of Cloverdale stated that the Russian River is hydrologically connected to the local groundwater basin. The reduced river flows will also reduce water available to replenish the groundwater basin.
- American Whitewater noted that the critical flow-monitoring gages should continue to operate after the Proposed Project, as they are important for recreator's safety.
- One commenter stated the EIR should evaluate river navigability.
- Lake County discussed the need for a groundwater monitoring plan; the need for more operations, storage, and streamflow gage analysis for an unimpaired Eel River; the need for a hydraulic model; and concerns about meeting downstream flow requirements.

4.2.11 Sediment

Many comments were focused on the Proposed Project's potential sediment-related effects.

- Several commenters expressed the importance of managing downstream sedimentation. Many commenters stated the impacts of fine sediment release on aquatic habitats, such as increased turbidity and decreased dissolved oxygen, will be in the short term, and the long-term effects are a net positive.
- Several of the commenters stated the importance of understanding the conditions necessary to quickly transport the sediment.
- Many commenters stated the EIR should thoroughly evaluate the effects of dam removal on sediment transport downstream. The evaluation should address sediment release volumes, transport, and depositional impacts on downstream reaches, including potential mobilization of legacy contaminants in reservoir sediments. Several commenters emphasized how river flows and volumes may affect erosion of the river channel and adjacent areas, including areas of known and potential archaeological resources, as well as revegetation with native plants to limit erosion.

- Several commenters expressed concern about the disposal of the sediment released and the potential mobilization of legacy contaminants in reservoir sediments. Humboldt Fishermen's Marketing Association, Salmon Returning, and California Sportfishing Protection Alliance recommended floating large suction dredges on Lake Pillsbury to transport sediment into flexible tubing that can be moved over the spillway to road-accessible trucks and then be transported at dug-out locations. At the off-site location, spawning gravel can be sorted from mud and used as soil amendments to support riparian areas and streamside bank stabilization that can support tree growth for shaded habitat.
- Several commenters stated the timing of releasing the sediment is critical. One of these commenters noted a drawdown plan and schedule is required for ensuring safe sediment transport and that drawdowns should occur when they will have the least impact on water quality and aquatic life.
- Many commenters stated release of sediment has the potential to be catastrophic to salmon and steelhead if not properly managed. One commenter stated CDFW must be consulted with regard to a streambed alteration agreement prior to any activity that will substantially obstruct or divert the natural flow, or substantially change the bed, channel, or bank of a river. Several commenters noted the EIR should evaluate alternatives that maximize fish passage and reestablish access to upstream habitats.
- Many commenters emphasized the importance of mitigation for aggregate removal, bank stabilization, and deeper channels following removal. Commenters added the EIR must include a comprehensive sediment and channel monitoring study and plan to model release rates, turbidity thresholds, and adaptive management responses.
- Several commenters stated the sediment should be mined before reservoir drawdowns. Sediment can be mined from the lake before drawdown, sorted, and released incrementally to reduce negative impacts of deposited sediment.
- Several commenters expressed concern about the toxicity of the sediment held behind the dam and the risk to downstream ecosystems. Several commenters stated the need for a plan to evaluate how restoring natural flow regimes, sediment transport, and cooler water temperatures will reduce nutrient retention and protect against harmful algal blooms and methylation of mercury. Several commenters noted the modeling should include post-removal nutrient dynamics, dissolved oxygen, and algal growth potential with adaptive management measures to prevent water quality impacts during the recovery period.
- One commenter stated that the Eel River is sediment deprived. The commenter emphasized the EIR should include the entire mainstem Eel River, starting with the headwaters feeding into Lake Pillsbury reservoir, the estuary, and the adjacent nearshore marine area to assess the natural hydrograph.

- Several commenters expressed concern with general sediment transport and channel migration. Several commenters noted integrated modeling is needed to understand hydrologic and ecological linkages and prevent unintended flow or habitat losses in the Eel River.
- Several commenters stated the EIR should assess long-term river management needs, including before, during, and after dam removal. One commenter stated long-term monitoring and ongoing research to understand the river's baseline and recovery is critical and should include: bank stabilization, temperature, dissolved oxygen, flow, turbidity, and heavy metal levels.
- Several commenters stated more information is needed on sediment composition prior to any construction activities.
- One commenter stated that the Tribal Environmental Office is concerned about the potential transport of arsenic in disturbed soils during highwater flows and transfer of arsenic from the Eel River watershed to the Russian River. The Potter Valley Tribe recommended that no water be diverted via the Potter Valley Hydroelectric Project's tunnel to the East Fork Russian River during the initial flushing of sediments as part of the planned rapid dam removal.
- One commenter stated the need to monitor for heavy metals in sediment. The commenter requested mitigation methods be considered related to movement of heavy metals and monitoring for any 303(d) listed metals such as mercury.

4.2.12 Erosion and Landslides

Several comments were received regarding the potential for erosion and landslides should the dams be removed.

- Two commenters remarked on the need to carefully consider erosion, highlighting areas near roads and bridges.
- An employee at the California Department of Transportation (Caltrans) provided comments submitted to the United States Army Corp of Engineers by Caltrans District 1 for the exploration of the raising of Coyote Dam requesting that the EIR evaluate whether the future releases could increase the potential for scour impacts to state bridges and impact stream bank stabilization improvements beyond baseline conditions, particularly in winter when flooding risks are increased.
- Two commenters remarked on the need for protection, mitigation, and enhancement measures specific to limiting erosion. One commenter stated the importance of timing the release to minimize impacts to aquatic life and that take mitigation measures like revegetation with native plants can help limit erosion. One commenter stated the need for the EIR to consider and evaluate alternative approaches and appropriate mitigations.

- One commenter stated landslide risks during dam removal need to be evaluated. The commenter requested the EIR consider and evaluate approaches and appropriate mitigations to reduce potential for reactivating historic landslides.
- Lake Pillsbury Alliance stated that the EIR should only base conclusions about landslide risk on adequate information. It should also require the applicant to determine how drawdown will affect groundwater levels and drainage within the landslide area
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club expressed concerns about the seismicity of the Proposed Project area and the need to manage potential landslides.

4.2.13 Recreation

Several comments were received regarding the potential for recreation issues should the dams be removed.

- Several commenters, including the City of Cloverdale, shared concerns about the impact of dam removal on the recreational opportunities provided by Lake Pillsbury such as swimming, boating, camping, and the summer home community. One commenter stated Lake Mendocino would no longer provide swimming, boating, and camping opportunities in the summer.
- Several commenters stated the general importance of recreation in the Proposed Project area to the county. Several commenters shared how the loss of reservoirs will reduce opportunities for some recreation but will create chances for others such as fishing, kayaking, and whitewater rafting, which will require river access points. One commenter shared that the State Water Board should work with the Mendocino National Forest and PG&E to develop agreements around the use of off-road vehicles. One commenter stated improving water quality will create healthier and safer recreation opportunities. Lake Pillsbury Alliance stated the EIR must evaluate the impacts of the destruction of Lake Pillsbury on boating, camping, fishing, and tourism economies at Lake Pillsbury.
- One commenter stated people are disconnected from the Eel River without trails to the water.
- Several commenters stated recreation on the Eel River is dangerous because of poor water quality conditions. One commenter noted the Eel River is riddled with large algal blooms and deemed unsafe for swimming and fishing.
- One commenter stated there is no public access to the lower Eel River.
- American Whitewater noted the EIR should evaluate continuity and navigability of public access. They included a request to evaluate continuity of public access

and navigability during drawdown, public implementation, and post-dam removal, specifically for put-in and take-out access for kayakers and rafters.

- American Whitewater stated the EIR should assess water quality conditions relevant to recreation.
- American Whitewater expressed concern with the short-term impacts to recreation such as channel evolution, debris, large wood, and unstable banks that may temporarily affect recreation and access.
- Lake County stated the need to evaluate impacts to recreation facilities that would remain after decommissioning.
- Lake County suggested restoration of the recreation facilities at Scott Dam after Proposed Project decommissioning.

4.2.14 Land Ownership

Several comments focused on potential effects to land ownership.

- Lake Pillsbury Alliance made comments on specific land ownership concerns that they say were inaccurately portrayed in the Draft Surrender Application; they requested that the corrections be made in the EIR. The comments concern the size and character of the Lake Pillsbury basin communities and businesses.
- Lake County commented that the EIR should address the ownership and management of currently submerged lands upon decommissioning, as it appears title to inundated lands may now be vested in the state. Lake County urges the State Water Board to seek guidance from the State Lands Commission on this matter and to provide relevant details to the public via the EIR and any other appropriate public disclosures.
- Lake County also provided comments regarding the Conservation Easement overseen by the Mendocino Land Trust. The easement purportedly covers certain currently inundated and other Proposed Project area lands. Participants in a recent state-funded visioning process for the Upper Eel River basin repeatedly expressed frustration surrounding a lack of clarity from PG&E and Mendocino Land Trust as to what alternative facilities could be developed.

4.2.15 Economics, Socioeconomics and Environmental Justice

Several comments were received regarding potential economic, socioeconomic, or environmental justice effects of Proposed Project dam removal, including property values.

- Many commenters shared concerns with the costs associated with dam removal. One commenter stated the dams will cost over \$500 million to remove without a cost or plan to replace Mendocino and Sonoma County water supplies. Several

commenters noted the costs to improve existing facilities are cheaper than to remove the dams, with one cost estimated to be \$75 million for fish ladder and modernization improvements.

- Several commenters, including Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance, noted the dams have historically resulted in reduced economic opportunity for downstream communities. One commenter requested the EIR fully assess cumulative impacts of dam removal together with any potential Eel–Russian River diversions to understand downstream impacts.
- Two commenters stated Humboldt County is in poor economic condition. The Humboldt Fishermen’s Marketing Association shared the county has dedicated funding for 100 years to protect the Humboldt County water supply from diversion of Eel River water to the Russian River system and from diversions of Trinity River water, and Russian River water users have constructed an economy around it.
- Several commenters stated that commercial fishermen would see benefits. One commenter noted that Tribal, fishing, and rural communities have borne the cost of degraded fisheries, unsafe infrastructure, and impacted cultural connections.
- Several commenters expressed concern about the increased cost of water if the dams are removed. One commenter shared there are 60,000 people depending on the water in the reservoirs and requested costs not increase from current rates for water following removal of the dams.
- One commenter emphasized that water users should not pay for rehabilitation efforts in the Eel River Basin.
- California Sportfishing Protection Alliance used PG&E’s Battle Creek Restoration Project as an example of delayed restoration and stated PG&E has not shown concern regarding project delays and costs to ratepayers and stakeholders.
- Several commenters expressed concern with the economic impact to the area if the dams are removed such as added costs and regulatory requirements for farms and ranchers to access water.
- One commenter suggested establishing a dedicated mitigation and maintenance fund (not to be deposited into a general fund) to address downstream dredging, sediment management, and long-term protection of municipal, agricultural, and community infrastructure and natural resources.
- Several commenters stated the dams are too expensive to keep in place. One commenter noted how PG&E stopped power generation as the dams are too expensive to operate.

- Two commenters stated that the EIR should include a full socioeconomic analysis that accounts for commercial fishing and coastal community impacts. One commenter shared how commercial fishing representatives must be included in the process to understand the economic losses to those communities.
- American Whitewater noted the need to evaluate future contributions to local and regional economies with the removal of the dams and water supply.
- Lake County stated the need to evaluate lost revenue to Lake County due to reduced recreation after decommissioning.
- Lake County stated they will lose tax revenue and unitary payments from PG&E with the license surrender and dam removal.
- One commenter stated environmental justice communities should be considered in the EIR.
- American Whitewater commented that the EIR should do the following:
 - Evaluate future contributions to local and regional economies from restored river recreation, including whitewater boating, angling, and related tourism. The analysis should take a holistic approach that considers economic gains from river restoration and recreation—not just potential losses associated with the removal of reservoirs.
 - Recognize improvements to quality of life associated with a healthy, free-flowing river, including increased outdoor recreation opportunities, community well-being, and public enjoyment of the river environment.
 - Consider equitable access to post-removal recreation benefits as an element of protecting designated beneficial uses, ensuring that nearby communities and Tribes can share in the long-term social and economic gains that develop from river restoration.
- One commenter shared the loss of water and water rights will affect their property value.
- One commenter requested an assessment of property value losses for Lake County.
- Lake Pillsbury Alliance stated that reduced property values will affect the types of businesses that can exist in the area. The EIR must evaluate the full range of impacts resulting from the massive changes that the Proposed Project would create in the affected watersheds.

4.2.16 Tribal Cultural and Historical Resources

Several comments were received regarding potential effects on Tribal cultural and historical resources following implementation of Proposed Project dam removal.

- Several commenters stated the importance of consulting with Tribes throughout the EIR development and decommissioning processes. One commenter stated the EIR should describe how the historic properties management plan and associated memorandum of understanding will integrate Tribal priorities for cultural resource protection and habitat restoration.
- A representative of the Round Valley Indian Tribes noted that the scope of the EIR should include measures to avoid impacts to Tribal and cultural resources as much as possible, and that avoidance, rather than mitigation, should be the primary goal. Another comment from a Round Valley Indian Tribe representative expressed that Tribal cultural resources include sites, landscapes, sacred places, and objects, and that traditional knowledge should give oral history and tradition the same weight as archaeological or written records. The comment also noted that confidentiality of tribal information is crucial and sensitive data should not be publicly disclosed without consent.
- Several commenters stated that protection, mitigation, and enhancement measures are needed to prevent harm to cultural resources. Many commenters emphasized the importance of a plan and monitoring to identify and protect cultural resources during and after construction.
- Several commenters expressed support for restoring Tribal fisheries. Many commenters noted cleaner, colder water would benefit salmon and steelhead recovery and support Tribal fishing practices.
- Two commenters noted the importance of assessing what Tribal lands will be affected in the decommissioning process.
- Three commenters stated the Eel River has state and federal designations to protect cultural values. One commenter noted the CWA Section 401 certification process is California's strongest tool to ensure PG&E's Proposed Project dam removal protects Tribal resources in the Eel River watershed.
- Two commenters commented on the importance of protecting cultural resources in the Russian River watershed.
- One commenter stated the importance of restoration of Indigenous connection with Eel River.
- Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance emphasized the importance of protecting plants and fish of cultural significance in Eel River.
- Several commenters expressed concerns about resources inundated by Lake Pillsbury being exposed by drawn down. One commenter stated protocols should be in place for how construction activities will change if cultural resources are uncovered to avoid unintentional harm.

4.2.17 Wildlife and Botanical Resources

Several comments were received regarding potential wildlife and botanical resources effects of Proposed Project dam removal.

- Several commenters, including CDFW and Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club, noted that the Eel River has state and federal designations to protect wildlife.
- Several commenters noted that salmonid species in the Eel River are important to the ecosystem and provide a food source for other wildlife.
- Several commenters, including CDFW and Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club, noted that fish populations need to be protected from potential adverse effects from decommissioning and dam removal activities.
- Two commenters emphasized the need for fish and wildlife recovery plans to be implemented after dam removal.
- Several commenters noted that the dams should be removed to protect fauna and flora.
- Several commenters, including CDFW and Lake County, stated that the EIR needs to evaluate potential Proposed Project impacts on plant and wildlife species, including rare, threatened, and endangered species.
- One commenter noted that Lake Pillsbury supports wildlife such as elk and raptors.
- Two commenters noted that a healthy Eel River is important for wildlife.
- CDFW provided the following suggestions for the EIR:
 - Evaluate wildlife habitat connectivity
 - Analyze how protection, mitigation, and enhancement measures will reduce impacts to rare, threatened, and endangered species
 - Evaluate impacts to sensitive plant communities
 - Describe mitigation areas in detail
 - Include a long-term resource management plan for mitigation land
 - Include a Restoration/Revegetation Plan(s) prepared by experts in California ecosystems and native plants
 - Include avian survey results
 - Require pre-construction nesting bird surveys

- Include an evaluation of impacts to tule elk in the Lake Pillsbury watershed
- Include an evaluation of impacts to native mollusks
- Include a mitigation monitoring and reporting program for fish and wildlife

4.2.18 Invasive Species

Several comments were received regarding potential effects of Proposed Project dam removal on invasive species.

- Several commenters noted that a restoration plan and/or a management plan for restoring native species and controlling invasives (plants, pikeminnow, mussels, etc.) needs to be developed for the Proposed Project.
- Several commenters noted that controlling the invasive pikeminnow would help protect salmon and steelhead populations.
- Humboldt Fishermen's Marketing Association, Salmon Returning, and California Sportfishing Protection Alliance noted that the reservoirs should be removed because they are a breeding place for invasive species.
- CDFW stated that the EIR should consider the population abundance and distribution of non-native fish such as Sacramento pikeminnow (*Ptychocheilus grandis*) within and upstream of the Proposed Project area and evaluate measures for minimizing the release of non-native fish from the reservoir into downstream waters during decommissioning activities.

4.2.19 Wetlands and Riparian Habitat

Several comments were received regarding potential effects on wetlands and riparian habitat from Proposed Project dam removal.

- One commenter stated the Eel River has state and federal designations to protect wetlands, lakes, streams, and any associated riparian habitats.
- CDFW noted that the Proposed Project may be subject to the notification requirement under Fish and Game Code 1602, Lake and Streambed Alteration Program. The EIR should fully identify the potential impacts to lake, river, and riparian resources and provide adequate avoidance, mitigation, and monitoring and reporting commitments.
- Several commenters stated the importance of conducting a wetland and riparian study to document existing habitats and potential Proposed Project effects.
- One commenter noted the EIR should assess the long-term river management needs such as riparian habitat, large woody debris, etc.

- The North Coast Regional Water Board stated that the Proposed Project has the potential to temporarily and permanently alter the distribution of state and federally protected wetlands.
- Lake Pillsbury Alliance stated that the EIR must fully evaluate and disclose impacts to riparian and wetland habitats during reservoir dewatering and post-removal recolonization.

4.2.20 Agriculture and Irrigation

Several comments were received regarding potential effects on agriculture and irrigation from Proposed Project dam removal.

- Several commenters noted that the EIR should evaluate downstream impacts that would occur from losing summer irrigation supply reliability.
- Two commenters noted that there is no need to change current irrigation ways.
- Lake County emphasized the general importance of agriculture and irrigation in Lake County.
- The City of Ukiah stated that the State Water Board should exercise its authorities under the CWA to regulate flow to protect beneficial uses of water, including water supply for municipal and domestic supply and agricultural supply. The City of Ukiah emphasized that the reasonable protection of these, and other, beneficial uses of water does not necessarily erode reasonable protection of other, equally valuable beneficial uses, such as protecting rare, threatened, or endangered species, including those on the Eel River.
- Save Potter Valley Project noted that the EIR should propose achievable mitigations within the Proposed Project schedule to protect domestic wells, firefighting capacity, and drought resilience throughout Potter and Russian River valleys.
- The Humboldt County Farm Bureau provided these comments on agriculture and irrigation:
 - Seasonal Water Optics and Flow Perception: Low flows in the late summer and early fall already present challenges. Without guaranteed regulated releases, the river may appear dry during key irrigation periods. This can create negative optics and potential misunderstandings about agricultural water use, and it can affect the public's ability to enjoy a natural resource.
 - Water Storage Policy Reform: Before dam removal proceeds, California's water storage laws must be updated to reflect modern realities. Current regulations restrict how long landowners can store water, preventing farmers, ranchers, and rural residents from capturing and holding water when it is abundant. The ability to retain water during wet months is critical to sustaining

crops, livestock, and communities during dry seasons and also supports instream flows for fish and aquatic-dependent species when surface water is scarce. We should not allow excess flows to rush unutilized to the ocean while local people and ecosystems struggle through the summer with inadequate supply. Water storage flexibility must be addressed before the dams are removed.

- Agricultural Representation: The Humboldt County Memorandum of Understanding primarily addresses water for fish but does not adequately consider agriculture. The Humboldt County Farm Bureau was left out of the County Memorandum of Understanding negotiations until after it was signed by the Board of Supervisors. We strongly oppose the exclusion of agriculture from these conversations and respectfully insist that the Humboldt County Farm Bureau have a direct and independent seat at the table. We do not authorize other entities to speak on our behalf.

4.2.21 Public Health and Safety, Dam Safety

Several comments were received regarding potential effects on public health and safety and general safety of the Potter Valley Hydroelectric Project dams (Scott Dam and Cape Horn Dam) from Proposed Project dam removal.

- Several commenters noted concerns about the current status of Potter Valley Hydroelectric Project dams, their overall aging infrastructure, and how the risk of earthquakes at the Proposed Project could increase potential risks to people downstream.
- American Whitewater noted that the EIR should evaluate river hazards and public safety considerations.
- The North Coast Regional Water Board stated the Proposed Project has the potential to expose people or structures to a significant risk of loss, injury, or death due to altered hydrology and peak runoff off changes.
- Lake County quoted Division of Safety of Dams reports documenting the October 18, 2023 inspections, where PG&E has stated the Potter Valley Hydroelectric Project dams are safe and performing satisfactorily.
- As also noted in Section 4.2.7 *Water Quality*, several commenters describe dangerous conditions of the Eel River due to poor water quality and toxic algal blooms.

4.2.22 Aesthetics

Several comments were received regarding potential aesthetic effects from Proposed Project dam removal.

- One commenter noted that the Eel River has Wild and Scenic River designations to protect the aesthetic attributes.
- Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance and Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club described how the long-term ecological and watershed health benefits would outweigh short-term aesthetic impacts from Proposed Project construction.
- Lake County and Lake Pillsbury Alliance noted that the aesthetics of Lake Pillsbury should be evaluated in the EIR, as compared to existing conditions. The “denuded reservoir” is the impact, not the baseline for analyzing aesthetic impacts. Short-term and long-term impacts must be assessed based on existing conditions.

4.2.23 Environmental Law Compliance

Several comments were received regarding potential effects on environmental law compliance for Proposed Project dam removal.

- Several commenters stated that the State Water Board should view the water quality certification process as a water and restoration tool.
- Several commenters, including Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance and Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club, stated the importance of the State Water Board's Restoration Policy implementation.
- One commenter noted that the Section 401 review is premature at this time and more information is needed before proceeding.
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club noted that the Potter Valley Hydroelectric Project does not have “incidental take” coverage under the ESA for fish.
- CDFW noted that the Proposed Project will need to consult with the United States Fish and Wildlife Service (USFWS) for ESA compliance and CDFW for CESA compliance.
- Several commenters noted that Proposed Project’s protection, mitigation, and enhancement measures need to be specific, measurable, and enforceable, under the Section 401 certification.
- Save Potter Valley Project, American Whitewater, PCFFA-IFR, and Save California Salmon asserted that the State Water Board must certify that

Proposed Project actions protect beneficial uses (municipal, agricultural, and groundwater recharge) under CWA Section 401 and the Porter-Cologne Act.

- Lake County noted the state’s policy under CEQA that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects,” pursuant to Pub. Res. Code § 21002. To achieve this objective and the other objectives of CEQA, an EIR must “identify the significant effects on the environment of a project, [. . .] identify alternatives to the project, and [. . .] indicate the manner in which those significant effects can be mitigated or avoided.”
- Many commenters noted other legal requirements that the EIR should consider or comply with. These include:
 - CEQA Guidelines (Cal Code Regs, title 14, §§ 15000 et seq., 15064, 15065, 15125, 15126.2, 15126.4, subd. (a)(1)(8).), 15130, 15380, 15381, 1602, 16355, 3503, 3503.5, and 3513)
 - Fish and Game Code, §§ 86, 1802, 1600 et seq., 2050 et seq, 2081.15, 3511, 4700, 5050, 5515
 - Public Resources Code, § 21000 et seq., §§ 21069; 21003, 21089
 - California Endangered Species Act and the Endangered Species Act
 - National Environmental Policy Act
 - CWA Section 401 (33 U.S. Code § 1341); Porter-Cologne Act (Wat. Code § 13160 et seq.)
 - California Wild and Scenic Rivers Act
 - California Constitutional Principles, Article. X, § 2 and Water Code § 106

4.2.24 Wildfire Suppression and Fire Danger

Several comments were received regarding potential effects from Proposed Project dam removal on wildfire suppression and fire danger.

- Several commenters, including the City of Cloverdale, described the importance of Lake Pillsbury and Scott Dam as water sources for fighting wildfires. Commenters were concerned that losing these water sources would restrict the ability to fight fires in the region. Lake Pillsbury Alliance stated that the EIR must consider groundwater and emergency water supplies for firefighting and provide accurate unbiased information on water availability for firefighting; Lake Pillsbury provides a year-round water supply essential to rapid response to fires.
- The City of Cloverdale stated there would be a significant adverse impact from the Proposed Project on water supply reliability for the City of Cloverdale and that

it will will greatly increase the wildfire risk to residents, businesses, and natural resources in the region. The Cloverdale Fire Protection District relies on the City's water supply to fight fires. The Proposed Project will reduce the reliability of the City of Cloverdale's water supply and storage, which will lead to water shortages during firefighting events, including minor urban fires.

- Several commenters noted that there would be an increased risk of wildfire if the Proposed Project were to proceed.
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club stated the forests need to be managed as a fire-safe landscape. The EIR should address restoring the natural hydrograph and managing forests for late seral conditions to create a more fire-safe landscape.
- Two commenters stated that firefighting capacity, by way of Lake Pillsbury's water storage, needs to be protected.
- Lake County stated that water reliability is particularly important during times of drought, and Lake Pillsbury currently provides that. If the lake is gone, firefighting response times would increase.

4.2.25 Cumulative Impacts Analysis

Several comments were received regarding potential cumulative impacts effects from Proposed Project dam removal.

- Many commenters, including CDFW, Save California Salmon, American Whitewater, ERPA, and Lake Pillsbury Alliance, emphasized the importance of a cumulative impacts analysis in the EIR. Commenters noted that the State Water Board needs to assess direct, indirect, and cumulative impacts from the Proposed Project.
- Several commenters noted that the cumulative impact analysis should include the effects of NERF.
- American Whitewater noted specifically that the cumulative impacts analysis needs to consider combined effects on recreation and public access.
- CDFW also provided the following comments:
 - CDFW recommends review of any previous biological technical reports and CEQA documents prepared for other projects in the vicinity of the Proposed Project to identify biological resources in the Proposed Project area and to perform a cumulative impacts analysis.
 - Cumulative effects on biological resources should be developed as described in CEQA Guidelines § 15130. General and specific plans, as well as past,

present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

- The City of Santa Rosa provided the following comments:
 - The EIR should assess the effects of the Proposed Project together with other stressors, like climate change, on water supplies in the Russian River basin. Additionally, the EIR should assess how the Proposed Project impairs the priorities and actions of the Supply Strategy.
 - As the proposed Project involves altering the water supply conditions for the Russian River Basin, the cumulative impacts analysis should include an assessment of impacts to closely related "past, present, and reasonably foreseeable probably future projects." This includes, but is not limited to, aquifer storage and recovery projects, Flood-Managed Aquifer Recharge projects, current and future water conservation projects, Forecast Informed Reservoir Operations, and recycled water projects.

4.2.26 Source Data and Information

Several commenters suggested new resources or source data to be incorporated into the EIR. Resources and data suggested are as follows.

- CDFW suggested that the EIR use several sources in the analysis:
 - California Natural Diversity Database
 - California Native Plant Society Rare Plant Inventory
 - USFWS Information for Planning and Consultation
 - CDFW's Areas of Conservation Emphasis
 - California Essential Habitat Connectivity Project
 - The Manual of California Vegetation (reference habitat connectivity)
 - Wildlife Conservation Board (reference funding)
- Humboldt County suggested the following resources be used for the EIR:
 - Stillwater Sciences et al., April 2021. Potter Valley Project Feasibility Study: Potential Ecosystem and Fisheries Responses to Project Alternatives. Prepared by Stillwater Sciences and McBain Associates, Arcata, California; McMillen Jacobs Associates, Boise, Idaho; M. Cubed, Davis, California; Princeton Hydro, South Glastonbury, Connecticut; and Geosyntec Consultants, Oakland, California for the Planning Agreement Parties
 - Stillwater Sciences, July 2021. Analyses of Fine Sediment Erosion Following the Proposed Scott Dam Removal, Eel River, California. Prepared for Two-Basin Solution Partners

- Stillwater Sciences. July 2021. Analyses of Fine Sediment Erosion Effects on Aquatic Species Following the Proposed Scott Dam Removal, Eel River, California. Prepared for Two-Basin Solution Partners
- <https://www.twobasinsolution.org/reports/>
- <https://humboldtcrd.org/programs/habitat-restoration/>
- <https://humboldt.gov.org/2820/Eel-River-Valley-Groundwater-Basin-Resou>
- <https://humboldt.gov.org/252/Surface-Mining-Reclamation-Act-SMARA-Doc>
- Moffatt & Nichol, August 2017. Eureka Littoral Cell, California – Coastal Regional Sediment Management Plan. Prepared for U.S. Army Corps of Engineers and Humboldt Bay Harbor, Recreation, and Conservation District
- Northern Hydrology & Engineering, April 2024. Eureka Littoral Cell Updated Tributary Sand Loads and Sand Budget. Prepared for Friends of the Dunes and the California State Coastal Conservancy
- Lake County suggested "CalEEMod" [California Emissions Estimator Model] should be used to determine construction emissions and impacts.
- Lake County suggested that several policies in the Transportation and Circulation Element of the Lake County General Plan may be applicable to the Proposed Project.
- PCFFA-IFR suggested that Pacific Fishery Management Council fisheries abundance and landings data should be used in the EIR.
- PG&E. 2022. Deed Of Conservation Easement And Agreement (Eel River Planning Unit) Between Pacific Gas And Electric Company, A California Corporation, As Grantor And Mendocino Land Trust Incorporated, A California Nonprofit Corporation, As Grantee.
- Humboldt Fishermen’s Marketing Association, Salmon Returning, and California Sportfishing Protection Alliance cited the “Department of Natural Resources 1982 report entitled Watershed Management for Highly Erodible Areas of North Coast California,” which could be used as a resource for the EIR.
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club suggested using an article from NMFS, “Roadway Runoff Known to Kill Coho Salmon also Affects Steelhead, Chinook Salmon,” from August 24, 2025 (see <https://www.fisheries.noaa.gov/feature-story/roadway-runoff-known-kill-coho-salmon-also-affects-steelhead-chinook-salmon>) to develop a mitigation measure for vehicles with tires.

4.2.27 Klamath Project

Several comments were received referencing the Klamath Project for Proposed Project dam removal.

- Many commenters noted that the recent Klamath Project's dam removals provide a learning opportunity for the Proposed Project and should be used as an example.
- One commenter noted that the Klamath Project is not a good comparison and should not be used as an example for the Proposed Project.
- Several commenters, including Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club and Humboldt Fisherman's Marketing Association, Salmon Returning, California Sportfishing Protection Alliance, noted that the Klamath Project (and other dam removals) shows feasibility of managing risks while safely removing dams.
- Several commenters, including Save California Salmon, Friends of the Eel River, and California Sportfishing Protection Alliance and Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club, noted that the Klamath Project was successful due to a strong Section 401 certification process.
- A commenter noted that, as they learned from the Klamath Project, FERC can slow down the Proposed Project's process and has a lot of decision-making authority with when and how to schedule hearings. The more prepared the State Water Board can be to move forward with the proposal is beneficial.
- Two commenters noted that the Klamath Project watershed has more fish because there is a project-associated fish hatchery contributing stocks to the watershed.
- American Whitewater noted that the Tribal engagement conducted for the Klamath Project protected cultural resources there.
- Lake County suggested that the Proposed Project use a similar strategy to the Klamath Project for groundwater mitigation.

4.2.28 Air Quality

Several comments focused on potential effects on air quality.

- Lake County expressed concerns regarding air quality from several sources of potential contamination: asbestos in Potter Valley Hydroelectric Project buildings, dust from potentially contaminated reservoir sediment, and smoke from

increasing wildfire occurrences. Lake County suggested a management plan is needed to control dust from sediment.

- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club noted that air quality in the Proposed Project area is good when there are no wildfires; vehicle traffic will cause some impairment; the EIR should include appropriate mitigation and minimization measures for air quality.

4.2.29 Roads, Traffic, and Transportation

Several comments focused on potential effects to roads, traffic, and transportation.

- Lake Pillsbury Alliance noted that the EIR must clearly identify all access roads that will be removed or altered around Lake Pillsbury, including identification of recreation area access that will be lost.
- Lake County noted that several access roads would need to be improved to allow for construction vehicles to decommission the dams. Lake County suggested that the EIR include assessment and evaluation of all access roads and other infrastructure and their suitability to facilitate the Proposed Project decommissioning, including future restoration and use of existing recreational and other facilities. The EIR should also evaluate potential temporary or permanent closures or restrictions on public access roads serving Lake Pillsbury recreation areas and adjacent communities. Additionally, the EIR should analyze the traffic and road network impacts.

4.2.30 Scoping Meeting Procedure

Several comments focused on the State Water Board's scoping process.

- One commenter asked for additional scoping meeting dates.
- One commenter noted they were having technical difficulties during the virtual meeting and that they would submit emailed comments.
- Two requests were received for a meeting to be held in Humboldt County.
- One commenter noted that no scoping meeting was held in Lake County.
- Two commenters noted that the State Water Board should give more advanced notice for scoping meetings and others in the future.

4.2.31 Other Comments

- One lawsuit against PG&E was presented to State Water Board staff at the Ukiah meeting on October 15, 2025 (*LaMalfa et al. v. Pacific Gas and Electric Company*, Verified Compl., No. 25CV02754, Cal. Super. Ct., Mendocino Cnty., filed October 7, 2025). The lawsuit primarily centers on water rights and riparian

rights in the Russian River watershed. A copy of the lawsuit is available on request from State Water Board staff.

- Round Valley Indian Tribes highlight the importance of evaluating impacts on tribal beneficial water uses, including traditional and subsistence fishing, ceremonies, and cultural practices, which are protected under California’s water quality plans and the Clean Water Act’s Section 401.
- Lake Pillsbury Alliance requested that the State Water Board ensure meaningful public engagement throughout the CEQA process. All technical studies, modeling assumptions, and draft sections should be made publicly available, with adequate time for review by interested parties and local governments. The public process should involve interested parties, including representatives of the Lake Pillsbury Alliance and the Lake Pillsbury Fire Protection District, in the development of measures to mitigate Proposed Project impacts.
- Several commenters discussed the proposal to raise Coyote Dam on Lake Mendocino, and how this potential dam raise may or may not increase water supply for the region to be used for fighting wildfires.
- One commenter provided the “Precautionary Principle,” which means “do no harm,” and suggested the Proposed Project should be guided by the principle.
- CDFW, Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club and Lake County commented that noise, vibrations, and utilities and public services needs from/for the Proposed Project should be evaluated.
- One commenter noted that general impacts from construction (e.g., greenhouse gases, land use, noise and vibration, transportation/traffic) should be evaluated.
- CDFW noted that potential adverse effects from Potter Valley Hydroelectric Project lighting should be evaluated in the EIR.
- Friends of the Eel River, Native Fish Society, Fly Fishers International, American Whitewater, and Redwood Chapter of the Sierra Club and Lake County noted that greenhouse gas emissions should be evaluated for the Proposed Project.
- Lake County suggested the development of a risk and uncertainty analysis for the proposed Scott Dam removal to better understand potential consequences and articulate the level of uncertainty or confidence in the data assumptions. If hydrologic information is limited or inconclusive, there is a lower level of confidence in the models, and assumptions are made to fill in gaps within the data.

APPENDIX A

NOTICE OF PREPARATION AND SCOPING MEETINGS FOR AN ENVIRONMENTAL IMPACT REPORT FOR THE POTTER VALLEY HYDROELECTRIC PROJECT LICENSE SURRENDER AND DECOMMISSIONING

APPENDIX B

REQUESTS FOR ADDITIONAL MEETING

APPENDIX C

NOTICE OF ADDITIONAL MEETING

APPENDIX D

NEWSPAPER PROOF OF PUBLICATION

APPENDIX E
MEETING PRESENTATIONS

APPENDIX F
MEETING TRANSCRIPTS