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July 23, 2026

Ms. Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Scoping Comments for the Potter Valley Hydroelectric Project Surrender and
Decommissioning, Project No. P-77-332

The City of Santa Rosa ("Santa Rosa") submits these scoping comments regarding the Environmental Impact Statement (EIS) for the proposed surrender and decommissioning of the Potter Valley Hydroelectric Project (Project No. P-77-332) (P-77-332 Scoping Notice). As a major municipality and retail water utility serving approximately 175,000 people, Santa Rosa is directly affected by the proposed decommissioning of Scott Dam and Cape Horn Dam, and the subsequent construction and operation of the New Eel-Russian Facility (NERF). Approximately 93% of Santa Rosa's water supply is purchased from Sonoma Water and originates from the Russian River, which has relied on Eel River water imports for over a century to support domestic, municipal, and industrial uses.

Santa Rosa acknowledges the importance of the Non-Project Use of Project Lands component of Pacific Gas & Electric Company's application and the specific inclusion of the proposed NERF construction as part of the decommissioning actions. Santa Rosa supports the prior and ongoing collaboration between Pacific Gas & Electric Company (PG&E) and the Eel Russian Project Authority (ERPA) to ensure a successful decommissioning is coordinated with construction of the NERF, including the re-purposing of existing Project components and assets for NERF operation, after PG&E's application for license surrender was received by FERC.

1. Proposed Action and Alternatives to the Proposed Action

Santa Rosa has no comments on the description of the actions proposed by PG&E (as the applicant) as part of their license surrender and decommissioning, including the non-project use of lands for the construction of the NERF. PG&E has requested surrender of their license to operate the project, and no other entity has successfully submitted to FERC a licensing interest proposal to assume the long-term operation of the existing facilities. Santa Rosa supports PG&E's proposal to develop management plans in consultation with resource agencies, tribes, and other interested parties, and file the plans by July 2027.

Santa Rosa, as a water supply contractor to Sonoma Water, has issued formal statements recognizing the continued diversion of water via the proposed NERF into the Russian River

watershed supports overall water supply reliability, fisheries, and operations of Lake Mendocino, as well as, particularly during dry periods, potentially providing water volume to supplement releases from Lake Sonoma thereby preserving storage and our contracted supplies.

2. The EIS Must Evaluate the "Whole of the Action" and the Entire Affected Watershed

The Federal Energy Regulatory Commission (FERC) is legally obligated to ensure the EIS does not adopt a narrow focus limited to the physical removal of dam structures. Under the National Environmental Policy Act (NEPA), federal agencies must take a "hard look" at the environmental consequences of major federal actions significantly affecting the quality of the human environment (*Oregon Natural Resources Council v. Marsh* (1995) 52 F.3d 1485). For this project, the "whole of the action" encompasses both the decommissioning of Project facilities and the construction and operation of the NERF, as these are "connected actions" that must be analyzed together in a single EIS (40 C.F.R. § 1508.25).

Furthermore, the geographic scope of the EIS must extend throughout the entire Eel and Russian River watersheds. Any reduction in historical diversions—which have already dropped from a historical average of 160,000 acre-feet annually (AFA) to just 39,000 AFA in recent years—has a proportionately large adverse impact on downstream beneficial users like Santa Rosa. The EIS must mirror the geographic scope of related federal biological opinions, which include the entire Russian River Basin and the ocean species that rely on these resources.

3. Mandatory Resource Areas for Detailed Downstream Study

To ensure a technically sufficient decision document, Santa Rosa identifies the following resource areas as critical for the project scope:

A. Water Use and Hydrology: The EIS must quantify how the surrender and the new winter-only diversion rules for the NERF will affect municipal water reliability. Without limiting the generality of the foregoing, the cumulative impacts analysis must evaluate Project impacts on:

1. Aquifer Storage and Recharge: Specifically, Aquifer Storage and Recovery (ASR) projects and Flood-Managed Aquifer Recharge (Flood-MAR) projects currently planned or in use by Santa Rosa and Sonoma Water.
2. Water Reuse Initiatives: This includes both recycled water projects and potable reuse projects designed to diversify the regional water portfolio.

3. Conservation Efforts: Current and future water conservation projects intended to reduce demand in the face of dwindling imports.

4. Reservoir Operations: The EIS should assess cumulative impacts on the operation of Lake Mendocino and Lake Sonoma, including the use of Forecast Informed Reservoir Operations (FIRO) to manage flood control and water supply.

5. Rediversion Impacts: Analysis must include potential redirected impacts on other supplies from Lake Sonoma to mitigate the loss of Eel River water formerly stored in Lake Mendocino.

B. Water Quality and Sediment Transport: The decommissioning of Scott Dam will proximately cause the release of approximately 12 million cubic yards of legacy sediment and the permanent alteration of flow regimes that support Santa Rosa's water supply. Impacts associated with these direct effects, including downstream effects within the entire watershed must be evaluated. The impact analysis must contemplate sediment releases over the proposed operating term of the NERF, and sediment impacts on NERF facilities.

1. Downstream Water Treatment Facilities. Without limiting the generality of the foregoing, the Commission must analyze how the massive release of sediment will affect the operational capacity of downstream water treatment plants.

C. Cost Responsibility, Economic Sustainability, and Long-Term Socioeconomic Impacts: The review should assess the socioeconomic consequences for downstream communities whose economic way of life relies on the Russian River watershed.

1. Cost and Cost Responsibility for NERF Construction and Implementation and Associated Impacts. The EIS must evaluate the costs of the project in a manner that is cognizable under NEPA. Economic impacts fall within the mandatory scope of review when they form the basis of choosing among alternatives, and such analysis cannot be misleading, biased, or incomplete. (*Seattle Audubon Soc. v. Lyons* (1994) 871 F. Supp. 1291, 1324.) Here, project cost and implementation and associated impacts must be evaluated in the EIS. The EIS should provide a detailed evaluation of total project costs, as cost constraints directly drive the selection of alternatives and the scope of feasible mitigation measures. (*NRDC v. U.S. Forest Serv.* (2005) 421 F.3d 797.)

2. PG&E's Cost Responsibility for NERF Mitigation: Because the NERF is the primary mechanism proposed to mitigate the significant environmental impact of losing Eel River water imports, the EIS must analyze PG&E's specific cost responsibility for its implementation over the 30- to 50-year implementation horizon. NEPA requires that

mitigation measures be "technically and economically feasible." Using "misleading economic assumptions" or failing to disclose the true long-term financial burden of this connected action would "skew the public's evaluation" of the project and thwart NEPA's informational goals. (*Nat. Res. Def. Council v. U.S. Forest Serv.* (2005) 421 F.3d 797.)

Conclusion

Santa Rosa requests that the Commission formally include these Russian River watershed-wide impacts and required cost analyses in the project scope to fulfill its federal mandates.

Respectfully Submitted,

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