July 22, 2026

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

SUBJECT: PROPOSED SURRENDER, DECOMMISIONING, AND NON-PROJECT USE OF PROJECT LANDS COMMENT LETTER PROJECT: P-77-332

Dear Ms. Reese:

On behalf of the Board of Directors and Elsinore Valley Municipal Water District (EVMWD), we thank you for the opportunity to provide these comments related to the subject project. We look forward that FERC will be taking these and other comments to develop a comprehensive NEPA record that fully evaluates water supply reliability, cumulative impacts, alternatives, mitigation measures, and public-interest consequences before considering surrender. Our questions and comments are provided to expand the scope of FERC's analysis and require it and PG&E to evaluate impacts that might otherwise receive limited attention.

Further, we have developed several general questions as well as questions specific to seismic issues, and others, below. We believe that a comprehensive review from all aspects, not just seismic, is important to an open and transparent process and that FERC rigorously evaluates whether the risk can be managed through less drastic dam removal alternatives that preserve the project's public health and water-supply benefits, and the type of issue that should be developed in the NEPA scoping record.

Water Supply Reliability and Public Interest

To meet the public interest requirement of Part 1 of the Federal Power Act (FPA), there must be assurances that constituents who depend on the water supply facilitated by the Potter Valley Project No. 77-332 will not be diminished by FERC decommissioning the Project.

- How will FERC evaluate the long-term impacts of surrender on water supply reliability for Russian River watershed users, including municipal water agencies, agricultural users, and downstream communities?
- What analysis will be conducted regarding the loss of storage currently provided by Lake Pillsbury and its role during drought conditions and for firefighting?

- Will FERC evaluate whether the proposed NERF facility can provide equivalent water supply reliability compared to the existing project, without a gap in the timing of that supply?
- What assumptions is PG&E using regarding future hydrologic conditions, drought frequency, and climate change, and will those assumptions be independently verified?
- How will FERC evaluate the public-interest consequences if the NERF is delayed, underperforms, or is never completed?
- Will FERC analyze alternatives that preserve water diversion capabilities while maintaining some or all existing project infrastructure?

Alternatives Analysis

- What range of alternatives will be evaluated beyond PG&E's proposed complete surrender and decommissioning?
- Will FERC evaluate alternatives involving the transfer of the project to another operator rather than surrender?
- Will FERC evaluate alternatives involving the continued operation of Scott Dam with modifications for fish passage?
- Will FERC consider phased decommissioning alternatives that preserve water storage until replacement infrastructure demonstrates successful operation?
- Will FERC evaluate alternatives that maintain Lake Pillsbury while implementing fisheries improvements?
- What criteria will FERC use to determine whether alternatives are reasonable and feasible?

Climate Change and Drought Resiliency

- How will the NEPA analysis account for increasing drought frequency and hydrologic variability in California?
- Will FERC evaluate the loss of drought resilience associated with removing one of the largest reservoirs in the watershed?
- How will future climate projections affect estimates of water availability under surrender and decommissioning scenarios?
- Will FERC analyze the cumulative effects of surrender together with other water supply constraints occurring throughout California, especially in light of the Governor’s Water Plan to create 9 million acre-feet of new supply/storage?

Cumulative Impact Analysis

- What other federal, state, tribal, and local projects will be included in the cumulative impacts analysis?
- Will FERC evaluate cumulative impacts associated with population growth, agricultural demand, wildfire risk, climate change, and regional water supply planning?
- How will cumulative impacts be analyzed if multiple restoration projects are occurring simultaneously within the Eel and Russian River watersheds?

Hydrology and Water Quality

- What studies will be conducted to evaluate changes in seasonal flows into the Russian River basin?
- How will FERC evaluate changes in groundwater recharge resulting from the removal of Lake Pillsbury?
- What modeling will be performed to evaluate sediment transport following dam removal?
- How will water quality impacts be assessed during dam removal and reservoir drawdown?
- Will the NEPA analysis evaluate impacts to downstream drinking water supplies during and after decommissioning?

Sediment and Reservoir Management

- What volume of sediment is anticipated to be mobilized following Scott Dam removal?
- How will sediment transport affect downstream reservoirs, water diversions, fisheries, and municipal infrastructure?
- What contingencies exist if sediment transport exceeds projections?
- Will FERC require independent peer review of sediment transport studies?

Fisheries and Ecosystem Tradeoffs

- How will FERC evaluate the tradeoffs between fisheries restoration benefits and water supply impacts?
- Will FERC quantify both ecological benefits and socioeconomic costs associated with surrender?

- What evidence supports assumptions regarding fish population recovery following dam removal?
- Will the NEPA analysis evaluate uncertainty associated with projected fisheries benefits?
- Has there been any legal confirmation by the Department of Commerce, National Marine and Fisheries Service, that the Biological Opinion (BO), issued by that agency some years ago, is still legally sufficient for FERC to base a decision on a hydropower project decommissioning application?

Socioeconomic Impacts

- How will FERC assess impacts on local communities that rely upon Russian River water supplies?
- Will the analysis quantify economic impacts associated with reduced water reliability during drought years (and potentially multiple dry years)?
- How will agricultural, municipal, industrial, and recreational water users be affected?
- Will FERC evaluate potential increases in water rates resulting from replacement infrastructure or reduced water availability?

Project Timing and Risk

- What protections exist if Scott Dam is removed before replacement diversion facilities are fully operational?
- Will FERC require demonstration that NERF can achieve intended diversion objectives before surrender becomes effective?
- What performance standards will apply to the NERF?
- What happens if NERF experiences operational failures after project surrender?

Federal Jurisdiction and Future Oversight

- PG&E proposes removal of NERF facilities from FERC jurisdiction once constructed. What continuing federal oversight, if any, would remain?
- How will FERC ensure long-term operation and maintenance of NERF facilities after surrender?
- What enforcement mechanisms would exist if NERF fails to meet operational expectations?

Studies and Information Requests

- Will FERC require independent review of hydrologic, sediment, fisheries, and climate analyses submitted by PG&E?
- What additional studies does FERC believe may be necessary before preparation of the draft NEPA document?
- How will FERC address uncertainties in modeling assumptions where significant public water supply interests are involved?
- Will FERC prepare an Environmental Impact Statement rather than a more limited environmental document given the regional significance of the proposal?

Seismic Issues

FERC must fully evaluate the nature, magnitude, probability, and location of the alleged seismic risk, and compare that risk against reasonable alternatives short of complete surrender and removal.

EVMWD asks that FERC analyze:

- Whether the seismic risk is immediate or speculative.
- Whether the risk can be mitigated.
- Whether the risk justifies surrender versus continued operation with modifications.
- Whether dam removal creates its own environmental and public safety risks.
- Whether the seismic concern affects water supply reliability more than public safety.

A full comparison of alternatives should be undertaken versus treating dam removal as the only feasible response.

Nature of the Risk

- What specific seismic hazard has PG&E identified?
- Is the identified fault considered active under current California Geological Survey standards?
- What is the estimated annual probability of the seismic event upon which PG&E bases its risk assessment?
- Has the seismic study been independently peer reviewed?
- Will FERC make all underlying seismic data and modeling assumptions publicly available?
- What uncertainties were identified in the study?

Location of the Hazard

- Does the identified seismic feature pose a direct threat to the dam's structural integrity?
- Is the hazard located upstream of the dam, downstream of the dam, or beneath the dam foundation?
- If the seismic concern is primarily related to landslide-generated wave action within the reservoir, what is the estimated magnitude of such an event?
- What is the estimated probability of such a landslide occurring during the remaining useful life of the project?
- What preventative or engineering measures have been evaluated related to the potential landslide and minimization of this risk?

Alternatives to Dam Removal

In relation to the seismic:

- What alternatives to complete dam removal were evaluated in response to the seismic findings?
- Were structural reinforcement alternatives evaluated?
- Were reservoir operating restrictions evaluated?
- Were reservoir drawdown alternatives evaluated?
- Were buttressing or stabilization measures evaluated?
- Were partial storage alternatives evaluated?
- Were risk-reduction measures compared economically to decommissioning?
- Why was surrender selected over repair, modification, transfer, or continued operation?

Public Safety Questions

If the risk is not a traditional downstream failure scenario:

- What specific public safety consequence is dam removal seeking to avoid?
- Who would be at risk if the identified seismic event occurred?
- How many people would be affected?
- What infrastructure would be affected?
- Is the primary concern public safety, environmental damage, operational reliability, or financial exposure?

- Has PG&E quantified expected fatalities, injuries, or economic losses under its seismic scenarios?

Dam Removal Creates Risk Too

- What geologic risks are associated with dam removal itself?
- Could removal destabilize slopes around the existing reservoir?
- Will FERC evaluate the seismic vulnerability of newly exposed reservoir sediments?
- How will removal affect erosion and sediment transport during future seismic events?
- Could a major seismic event during decommissioning create greater environmental impacts than maintaining the dam?

Water Supply Reliability Questions Related to Seismic Issues

- Has PG&E evaluated the loss of drought storage resulting from the removal of Lake Pillsbury against the probability of the seismic event?
- How does PG&E compare the projected seismic risk with the regional water-supply benefits currently provided by the reservoir?
- Has any quantitative risk-benefit analysis been performed?
- Will FERC evaluate whether loss of reservoir storage increases public health and safety risks during drought emergencies or wildfires?
- How will FERC weigh seismic concerns against long-term water reliability impacts affecting millions of downstream water users?

NEPA Questions for FERC Related to Seismic Issues

- Will the NEPA document independently evaluate PG&E's seismic conclusions rather than simply accepting them?
- Will FERC retain independent dam-safety or geotechnical experts?
- Will alternative methods of managing seismic risk be evaluated?
- Will FERC compare the environmental impacts of dam removal against continued operation with seismic mitigation measures?
- Will cumulative impacts include loss of drought resilience and emergency water storage capacity?

EVMWD Closing Questions

If the seismic concern identified by PG&E is associated with a geologic feature located upstream of the dam and not a conventional downstream dam-failure risk, what alternatives

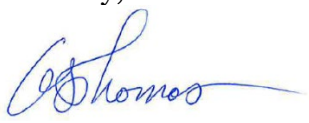
will FERC evaluate to determine whether that risk can be mitigated while preserving the significant water-supply, drought-resilience, and public-benefit functions currently provided by Lake Pillsbury?

Given the substantial role the Potter Valley Project has played in providing water supply reliability to the Russian River watershed for nearly a century, how will FERC ensure that the NEPA analysis fully evaluates whether surrender and dam removal can be accomplished without materially reducing long-term water supply reliability, drought resilience, and public welfare for downstream communities?

Will the federal government be willing to assess the benefits of the federal takeover of the dams? Given the extraordinary water supply problems in the West, should the federal government be investigating opportunities to use existing dams, rather than contemplate building new dams, as a cost-effective way to address the water supply problems in the West?

Thank you for your consideration of these comments. We appreciate the opportunity to participate in the scoping process and look forward to continued engagement as this process moves forward. If you have any questions or need additional information, please contact me at gthomas@evmwd.net or (951) 674-3146, ext. 8251.

Sincerely,



Greg Thomas
General Manager

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