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County of Lake
255 N. Forbes Street
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SLR Project No.: 102.021249.00001

RE: SLR Comments on PG&E's Draft Application for Surrender of License and Application for Non-Project Use of Project Lands dated January 2025

1.0 Introduction

SLR International Corporation (SLR) has been contracted by the County of Lake to analyze the effects of the proposed Scott Dam decommissioning, including providing comments on the Draft Application for Surrender of License prepared by Pacific Gas & Electric Company (PG&E).

PG&E has prepared a Draft Application for Surrender of License and Application for Non-Project Use of Project Lands dated January 31, 2025 (*Draft Application for Surrender of License; PG&E, 2025*) for the Potter Valley Hydroelectric Project (*Federal Energy Regulatory Commission [FERC] Proceeding No. 77*). The Draft Application for Surrender of License includes information on the decommissioning process for the Potter Valley Hydroelectric Project, and for the construction of a New Eel Russian Facility, which is identified as non-project use of project lands by the Eel-Russian Project Authority (ERPA).

This letter report summarizes SLR's comments on PG&E's 2025 Draft Application for Surrender of License. The comments provided only refer to the Application for Surrender of License aspects, and not the Non-Project Use of Project Lands by the ERPA.

Although FERC has primary regulatory authority in the Decommissioning Proceeding filed under FERC Docket P-77, the County would like SLR to provide recommendations on environmental mitigation and economic impacts to be considered by both PG&E and FERC in connection to the Environmental Impact Statement (EIS) process required by the National Environmental Policy Act (NEPA) and the Environmental Impact Report (EIR) process required by the California Environmental Quality Act (CEQA). PG&E will submit a Final Application for Surrender of License to FERC in July 2025.

The focus of SLR's comments is on the existing known or documented conditions and effects within the County of Lake; impacts outside of the County may likewise be noted, where relevant to the County of Lake's concerns.

The position of the County of Lake Board of Supervisors is that PG&E has not demonstrated the full effects of dam removal, proposed environmental mitigation measures or addressed potential economic impacts to the County[1][2].

Organization of the Comment Letter:

This letter is organized as follows:

[1] County of Lake, 2023.Motion to Intervene and Comments of the County of Lake. July 31.
[2] County of Lake, 2023b. PG&E's Proposed Decommissioning of Potter Valley Project and Scott Dam. July 11.

1.0 – Introduction: Provides an overview of the Draft Application for Surrender of License and Application for Non-Project Use of Project Lands dated January 31, 2025; background information on work conducted by PG&E and others for the Potter Valley Hydroelectric Project, and Interventions by the County of Lake.

2.0 – General Comments by SLR: This section lists general comments on the Draft Application for Surrender of License, and the general decommissioning process.

3.0 – Comments on PG&E Surrender Application: This section is subdivided into 19 subsections that correlate with the Affected Environment resource areas identified by PG&E. In particular, the resource areas directly match those listed in *Volume II, Section 3.3 Affected Environment* of the Draft Surrender Application. A summary correlation table is included for the reader.

1.1 Background Information

In 1922, Lake Pillsbury was created by the construction of Scott Dam, one of two dams included in PG&E's Potter Valley Hydroelectric Project. Scott Dam is located on the Eel River in the County of Lake, within the Mendocino National Forest.

PG&E is proposing to decommission the Potter Valley Hydroelectric Project, which includes Potter Valley Powerhouse, Cape Horn Dam and Scott Dam. The Draft Application for Surrender of License considers removal of Scott Dam and draining Lake Pillsbury. The proposed decommissioning of Scott Dam is also considered by some interested parties as part of a broader initiative to restore the Eel River's ecosystem and improve fish passage[3].

Scott Dam is a concrete, gravity-type, ogee-shaped structure. It is 130 feet high and 805 feet long. The spillway crest elevation is 1,900 feet[4]. There are five radial gates and 26 steel slide gates surmounting the spill crest that allow storage of water 10 feet above the spill elevation.

At its maximum capacity, Lake Pillsbury has a surface area of approximately 2,275 acres with an elevation of 1,910 feet. The initial design capacity of the lake is 76,876-acre feet at the elevation of 1,910 feet. PG&E reduced this capacity in 2023 due to concerns of dam instability, to a maximum elevation at the spillway crest of 1,900 feet. Therefore, the reservoir is currently operated for a storage capacity of 66,876 acre-feet (ac-ft).

1) On January 25, 2019, PG&E filed a notice of withdrawal with FERC, discontinuing its efforts to relicense or sell/transfer the Potter Valley Hydroelectric Project. FERC issued a notice soliciting applications, which did not result in a viable new applicant[5].
2) Since July 2021, the Potter Valley Powerhouse has been offline. PG&E determined a transformer did not meet operating standards (PG&E, 2025). No plans were made to return the Potter Valley Powerhouse to service.
3) The Project License expired April 14, 2022. The default license term for most hydroelectric projects under FERC jurisdiction is 40 years. Currently PG&E operates the project under annual licenses (PG&E, 2025).
4) FERC issued a Notice of Authorization for Continued Project Operation, on April 21, 2022.

[3] Friends of the Eel River, n.d. https://eelriver.org/about-us/
[4] Scott Dam Area elevations are based on PG&E's datum, which equals National Geodetic Vertical Datum of 1929 (NGVD29) + 81.7 feet. Elevations for Potter Valley Project (PVP) facilities in the Cape Horn Dam area are in relationship to the North American Vertical Datum of 1988 (NAVD88) datum.
[5] FERC Accession No. 20190125-5100 and FERC Accession No. 20190301-3038.

5) On July 8, 2022, PG&E proposed to file a Surrender application by January 2025, which was acknowledged by Commission staff on July 29, 2022.

6) In 2023, the Scott Dam spillways were permanently opened due to seismic risk with the approval of the Division of Safety of Dams (*DSOD, a Division of the California Department of Water Resources*). Lake Pillsbury reservoir had 20,000 AF of reduced capacity. PG&E submitted a long-term flow variance request to FERC. A Water Quality Certification for the lower flow is pending with the State Water Resources Control Board[6].

7) On December 12, 2023, a Joint Exercise of Powers Agreement was executed by Mendocino County Inland Water and Power Commission, County of Sonoma and Sonoma County Water Agency to create the Eel-Russian Project Authority (ERPA)[7].

8) On June 6, 2024, PG&E documented progress in developing a Decommissioning plan among the consulting parties. Prior to filing their final application with FERC, PG&E provided a revised Surrender application to interested parties and agencies in January 2025, for a 30-day comment period. The anticipated filing of a Final Surrender application by July 29, 2025.

Several non-governmental organizations (NGOs), governmental agencies, and working groups have an interest in the Decommissioning process.

Further, all project lands are covered by a Conservation Easement, which transfers the lands for conservation of the property for beneficial public values and significantly limits opportunity for future development. The Easement includes: protection of the natural habitat of fish, wildlife and plants; preservation of open space; limited outdoor recreation by the general public; sustainable forestry; agricultural uses; and historic values (*Deed of Conservation Easement and Agreement [Eel River Planning Unit]*; PG&E, 2022).

1.2 Interventions and Comments by the County of Lake

On July 31, 2023, the County of Lake filed a motion to intervene on the Potter Valley Hydroelectric Project Decommissioning with FERC using FERC Rule 214 subdivision (b). The County's interests in the proceedings include:

1) The Potter Valley Project (PVP) doesn't just generate power but also provides water supply for agriculture, recreation, and wildfire suppression.

2) The County has an interest in this matter as this project creates Lake Pillsbury on the Eel River. This lake has 31 miles of shoreline, used for recreational activities such as fishing, boating, sailing, and waterskiing.

3) The County opposes Decommissioning of Scott Dam, in part, because PG&E has not outlined mitigation measures that would be put in place to address environmental and safety concerns raised by the County.

4) If FERC provides approval for Decommissioning of Scott Dam, the County of Lake requests the following mitigation measures:

[6] State Water Resources Control Board (SWRCB), 2017. Study Requests and Comments on the Pre-Application Document and Scoping Document 1 for Potter Valley Hydroelectric Project, FERC Project No. 77, Mendocino and Lake Counties. August.

[7] The Agreement is available here: https://www.sonomawater.org/media/PDF/Water%20Resources/Potter%20Valley%20-%20ERPA/for%20signature_%20JEPA%20FINAL%20-%20Eel%20Russian%20Project%20Auth%20-%20signed.pdf

a. Establishing fire protection measures that directly address wildfire risks resulting from removal of Scott Dam;

b. Establishing water rights for the County of Lake and its residents on Scott Dam, and implementing water storage measures for the County of Lake;

c. Financial consideration of lost County of Lake property tax collections, and any and all revenue losses to result from removal of Scott Dam;

d. Additional monetary consideration for loss of economic development opportunity in the County of Lake;

e. Full restoration and revegetation of the area, restoring flora and fauna in areas due to the loss of Scott Dam and Lake Pillsbury;

f. Constructing road and other infrastructure improvements necessary to safely complete the decommissioning plan.

- The County asserts that any financial burden of these mitigation measures should be the responsibility of PG&E, as PG&E should remain responsible for the PVP and all consequences throughout the project lifecycle including Decommissioning.
- Additionally, FERC should maintain PG&E's Licensee status until these mitigation efforts are addressed. For example, FERC required PacifiCorp (the project owner) to stay Co-Licensee surrounding Decommissioning of the Klamath Dams.

On December 23, 2023, the County of Lake issued a comment letter to PG&E regarding the PVP Initial Draft Surrender Application. This letter expressed concern regarding the lack of sufficient consideration for the effects of decommissioning on the County of Lake. These effects include loss of property, environmental concerns, regional loss of recreation, loss of water supply for wildfire suppression, and more. Additionally, the rapid timeline proposed by PG&E and lack of risk mitigation measures with respect to the County of Lake was an issue. The County is concerned about the need to manage large amounts of sediment and the lack of communication between PG&E and the County. Lake Pillsbury is an important source of economic activity as well as local government tax revenues.

PG&E documents several meetings with the County of Lake in their Draft Application for Surrender of License; nevertheless, no substantive formal response to comments has been provided by PG&E to address the County of Lake's concerns.

1.3 FERC / NEPA / CEQA Process

PG&E has summarized the process to be followed by FERC and the State Water Resources Control Board as required by NEPA and CEQA. The process described is similar to what has been followed in other decommissioning processes.

A final approval of the Surrender Application would be documented in a FERC Order with conditions as specified in the EIS (*led by the FERC*) and EIR (*led by the State Water Resources Control Board*), Management Plans (*prepared by PG&E and others*), and any other conditions.

2.0 General Comments by SLR

In accordance with 18 Code of Federal Regulations Ch. I § 6.1, an application for the Surrender of a license for a dam must include a detailed plan outlining the disposition of project works and any required restoration measures. The plan should address environmental, public safety, and operational concerns associated with cessation of the project's use. The Surrender application

must be filed with FERC, accompanied by necessary environmental documentation and stakeholder consultations to ensure compliance with federal regulations. Based on SLR's independent review:

1) PG&E has not fully addressed or requested an evaluation of Federal and California Environmental review processes. The County of Lake intends to participate in both processes.
2) Specific studies are not included in the Draft Application for Surrender of License even though PG&E acknowledged in the Surrender Application additional studies will be conducted as part of the final Decommissioning per the future FERC order to be issued.
3) In the Draft Application for Surrender of License, there are references to facilities and features that will be left in place (*including piezometers and block building*) and there is no detailed discussion with respect to the plan to leave in place/restore.
4) The County of Lake has not been included in meaningful stakeholder consultation, and therefore the stakeholder consultation has not been adequate from the County's perspective.
5) PG&E has stated in the Draft Application for Surrender of License that various impacts resulting from the Scott Dam Decommissioning are unavoidable adverse impacts. However, the SLR review indicates these impacts are not sufficiently evaluated to be considered unavoidable.
6) PG&E should more thoroughly evaluate these impacts to establish that they are unavoidable and identify and evaluate options for minimizing unavoidable impacts. The County proposes PG&E include additional restoration scenarios that will likely minimize the unavoidable impacts to the County and enhance recreation, ecosystem, and fire suppression benefits. We recommend PG&E discusses with the County of Lake these likely options before the final Application for Surrender of License is submitted on July 29, 2025.

Unavoidable adverse impacts are defined in both NEPA and CEQA. The definitions include:

- NEPA states "Effects that can not be avoided due to constraints in alternatives. These effects do not have to be avoided by the planning agency, but they must be disclosed, discussed, and mitigated, if possible [40 CFR 1500.2(e)]" [8].
- CEQA states "A project impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level if the project is implemented. If a lead agency proposes to approve a project with significant unavoidable impacts, it must adopt a statement of overriding considerations to explain its actions (CEQA Guidelines, Section 15093(b))"

PG&E has indicated in the application that several impacts are unavoidable; nevertheless, PG&E has failed to identify mitigation strategies and offsets. PG&E would need to comply with NEPA and CEQA with respect to defining the unavoidable impacts.

Clear understanding of the impacts expected to result from the proposed decommissioning is important to the County, as following the decommissioning process, the County of Lake will need to revise its General Plan and the Local Area Plan.

[8] US Forest Service, nd. NEPA Glossary. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5298903.pdf

During a public online meeting on February 6, 2025, PG&E described how the dewatering of Scott Dam (*to occur during the low-flow season*) would not necessarily be followed by sediment being flushed down the river during the subsequent high-flow season. The Draft Application for Surrender of License does not describe dam removal activities during different years. Rather, there are mentions of complete rapid removal being completed in approximately two years. The Conceptual Decommissioning Plan does not specify how Scott Dam and the Eel River flows will be managed if the first high-flow season does not occur the November following the initial low-flow season (*i.e. if it is a low-flow winter that does not produce much precipitation*).

It is unclear how PG&E will determine when a wet season with enough precipitation is anticipated to conduct the sediment flushing needed during the first high-flow season described in the Conceptual Decommissioning Plan. PG&E should consider using the definition of the historic precipitation data in forecasting expected wet and dry seasons. In the absence of a high precipitation season, a long slow bleed of sediments may occur for many years, and PG&E would need to address these scenarios in the Sediment Management Plan.

Several plans to manage and mitigate environmental effects are briefly described in the application. PG&E needs to provide more detailed information on how proposed mitigation measures will be implemented. Additional comments are anticipated to be provided when these details become available.

3.0 Comments on PG&E Surrender Application

SLR comments are presented in the following subsections, organized by the resource areas in the draft PG&E application. For the reader's reference, this table outlines the corresponding sections in the PG&E application and this comment letter. Any comments that were not related to a specific resource areas in the PG&E Draft Application for Surrender of License are presented in Section 3.19.

Topic	PG&E Vol I	PG&E Vol II	SLR Comments
Water Use and Hydrology	6.3.1.1	3.3.1 3.4.1.2	3.1
Water Quality	6.3.1.2	3.3.2 3.4.1.3	3.2
Fish and Aquatic Resources	6.3.1.3	3.3.3 3.4.1.4	3.3
Botanical Resources	6.3.1.4	3.3.4 3.4.1.5	3.4
Wildlife Resources	6.3.1.5	3.3.5 3.4.1.6	3.5
Geology and Soils	6.3.1.6	3.3.6 3.4.1.7	3.6
Geomorphology	6.3.1.7	3.3.7 3.4.1.8	3.7

Topic	PG&E Vol I	PG&E Vol II	SLR Comments
Land Use	6.3.1.8	3.3.8 3.4.1.9	3.8
Recreation Resources	6.3.1.9	3.3.9 3.4.1.10	3.9
Aesthetic Resources	--	3.3.10 3.4.1.11	3.10
Cultural Resources	6.3.1.10	3.3.11 3.4.1.12	3.11
Tribal Resources	6.3.1.11	3.3.12 3.4.1.13	3.12
Socioeconomic Resources	6.3.1.12	3.3.13 3.4.1.14	3.13
Environmental Justice	--	3.3.14 3.4.1.15	3.14
Air Quality	--	3.3.15 3.4.1.16	3.15
Noise and Vibration	6.3.1.13	3.3.16 3.4.1.17	3.16
Traffic	--	3.3.17 3.4.1.18	3.17
Marine Resources	6.3.1.14	3.3.18 3.4.1.19	3.18
Others	--	--	3.19

3.1 Water Use and Hydrology

- PG&E needs to discuss the local beneficial uses of Lake Pillsbury water, including drinking, recreational, and others, and how loss of this water supply for the various beneficial uses will be mitigated. PG&E notes in the application there are no expected effects on water reliability or cost in the Scott Dam Area because there are no known surface or authorized water diversions, but PG&E did not acknowledge the potential recharge to groundwater from Lake Pillsbury, which will result in reduced water reliability and increased cost for well owners. Additional related comments are provided as part of Geology and Soils and Socioeconomic Resources sections herein.

- Water from Lake Pillsbury is currently used for fire suppression, and removing the lake will affect this resource and water use. Additional related comments are provided as part of the Land Use section.
- PG&E should evaluate the water supply and the effects on groundwater recharge as part of the final surrender application. Water supply insecurity has been a concern during drought conditions in recent years even with Scott Dam in place. As part of the NEPA Process, PG&E may be required to prepare a Water Supply Management Plan and Public Drinking Water Management Plan. The Draft Application for Surrender of License does not include any details on these plans. It is currently unknown what the anticipated groundwater levels will be in the vicinity of Lake Pillsbury. Drinking water should be made available to well owners that will be affected by the reduced groundwater recharge resulting from draining the lake. Long-term effects are not expected to be known until several years have passed.
- PG&E notes "removal of the dam would restore flows in the Eel River to unimpaired natural conditions. High flows are similar under existing conditions (*i.e. No-Action*) and the Proposed Action (refer to Section 3.3.1, Figure 3.3.1-18), but low flows would vary substantially. […] Because there are no water users in the Eel River between Scott Dam and the Van Arsdale Diversion, the Proposed Action would have no effect on water users in the river reach." PG&E needs to evaluate the current beneficial uses of Lake Pillsbury to include recreational, ecosystem, and fire suppression.
- The mass balance approach PG&E used to determine unimpaired flows and flood frequency is unconventional per standard industry practice. PG&E needs to develop a flood flow frequency analysis based on the USGS Guidelines for Determining Flood Flow Frequency – Bulletin 17C[9] and perform an uncertainty analysis to account for the raw hydrology data and unimpaired natural flow assumptions. Active USGS gages along the Eel River and within the County of Lake are limited and restricted in the information provided. Streamflow gages near Scott Dam only record periods where flow is controlled or impaired by dam operations and there are no known or active precipitation gages within the entire Eel River watershed. The streamflow gages used in the hydrologic analyses are likely to incur levels of uncertainty based on the unimpaired data available. PG&E should further analyze the raw hydrology data and assumptions to perform an uncertainty analysis.
- The January 2025 Draft Application for Surrender of License does not provide any insight on validating or calibrating the hydrology assumptions for unimpaired flows. PG&E needs to add additional streamflow gages upstream of the Scott Dam to understand inflows to the impoundment, validate and calibrate unimpaired natural flows, and predict future climate change flows. Note that, the California State Water Resources Control Board, as part of the 2022 California Stream Gaging Prioritization Plan, have highlighted the Smokehouse Creek-Lake Pillsbury, Lake Pillsbury-Eel River, and Rice Creek-Rice Fork watersheds that supply Lake Pillsbury as high-priority watersheds with significant gaps in their stream gaging network.[10] The Plan also highlights that the Eel River reach between Scott Dam and Cape Horn Dam are not defined as well-gaged but as almost well-gaged or un-gaged.

[9] https://pubs.usgs.gov/tm/04/b05/tm4b5.pdf
[10] SB 19 Stream Gaging Plan | California State Water Resources Control Board

- PG&E should conduct further analysis into the operations, storage, and streamflow gage relationship to better understand the flow relationship to operations and assumptions for unimpaired flows and water supply. Further analysis over the entire period of record will also provide a level of confidence in the data and assumptions made for the hydrology and hydraulics. Operations of Scott Dam have changed due to varying regulations and restrictions over the life of the dam. Storage capacity has likewise changed, due to the accumulation of sediment within Pillsbury Reservoir and permanently opening the spillway gates due to seismic concerns. SLR recommends verifying the assumption of no sediment management or removal of sediment within the Lake Pillsbury Reservoir. Changes in operations and storage can affect the stage discharge relationship.
- To the benefit of stakeholders including the County, PG&E should make all relevant data available to stakeholders and firms providing contracted technical support. Scott Dam has been in place since 1921, and there is limited publicly available data. A majority of relevant data is managed by PG&E. The various reports and studies completed reference a variety of PG&E supplied data not made available for this review.
- PG&E needs to further develop the hydrology, building on past analyses to evaluate future climate change scenarios as part of the environmental analysis for dam removal.
- PG&E should develop a hydraulic model to better define the proposed action during varying seasons and recurrence intervals. This would also support quantifying the sediment yield.
- PG&E needs to analyze sediment grain size distribution and determine the grain size and flow correlation for mobility (*i.e., At what flows will sediment move?*) to support changes in the longitudinal profile as well as core sampling the entire depth of sediment within Lake Pillsbury. Tributaries upstream and downstream of Scott Dam are likely sediment sources that account for and will continue to transport sediment into the Eel River system under all conditions.
- PG&E needs to develop 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. The hydrology informs the hydraulics and the function of the existing and proposed infrastructure and the assumptions under proposed conditions. If hydrologic information is limited or inconclusive, there is a lower level of confidence in the models and assumptions made to fill in gaps within the data.
- PG&E notes "The Flood Monitoring Plan would establish protocols for monitoring water levels and flood risks, enabling proactive measures to protect infrastructure and surrounding areas." The details of the proposed plan will need to accommodate the findings of the additional hydraulic modelling for defining the monitoring requirements.

3.2 Water Quality

- PG&E notes they expect a short-term adverse effect due to the suspended sediment and turbidity following removal of the dams. Based on the level of uncertainty of the models, and lack of grain size analysis data, it appears that the anticipated period of several days up to several months, and additional effects with remobilization for 1 to 3 years may be optimistic. PG&E should conduct further studies to improve the sediment grain-size distribution dataset and update the sediment transport models with improved data.

- PG&E should consider the above suggested additional data collection in development of short term and long-term sediment mitigation measures, including engineering controls and maintenance activities.
- PG&E acknowledges there will be impacts to water temperatures during and following the removal of Scott Dam. Given the uncertainty of the existing models, these may be underestimated, and additional evaluation with improved data should be conducted by PG&E in order to facilitate the methodologies for temperature monitoring.

3.3 Fish and Aquatic Resources

- The Application does not include the estimated current fish population of Lake Pillsbury. The Draft Application for Surrender of License provides an overview of fish and aquatic resources in the Project Study Area, which includes the Eel River from upstream of Lake Pillsbury downstream to the ocean, including the East Branch of the Russian River to Lake Mendocino. PG&E needs to include the lake-related fish population for estimating the ecological impacts due to the decommissioning of the Lake.

3.4 Botanical Resources

- PG&E needs to document the botanical resources within the footprint of Lake Pillsbury to better address the maintenance and improvements necessary to sustain these resources as part of the decommissioning process.
- PG&E needs to document riparian and wetland resources within the footprint of Lake Pillsbury to better address the maintenance and improvements necessary to sustain these resources as part of the decommissioning process.

3.5 Wildlife Resources

- PG&E needs to document the wildlife resources within the vicinity of Lake Pillsbury to better address the maintenance and improvements necessary to sustain these resources as part of the decommissioning process.

3.6 Geology and Soils

- PG&E needs to evaluate impacts on surface and groundwater interactions following dam removal and its effects on groundwater wells as part of the Surrender Process. It is anticipated stored groundwater will be used, and without surface water replenishment from the reservoir, groundwater levels will be lower and affect existing wells. As a mitigation, PG&E should establish a well monitoring program pre- and post-dam removal, and funding to support well owners to repair or deepen existing wells to allow access to groundwater.
- The Draft Application for Surrender of License says there was no readily available information on the specific groundwater wells that may be affected. PG&E should conduct additional evaluation of the publicly available well completion reports and identify potentially affectedwells.
- PG&E should conduct additional hydrogeological assessments and evaluate the radius of impact of the groundwater level drawdown. Once the system is better understood, PG&E should contact residents and landowners in the impacted radius to notify of these potential impacts, and request information on existing wells in the affected area. A detailed groundwater monitoring plan should be developed prior to decommissioning of Scott Dam.

- Suggested mitigation strategies similar to those established for the Lower Klamath Projects should be considered by PG&E. For example, in that instance, the Water Board required the following conditions to be met by the Renewal Corporation. Note that the distances or number of locations listed below are for information only, and site-specific criteria applicable here needs to be developed based on further studies:
    a) Monitor groundwater levels within a 2.5-mile range of the high-water marks, before, during and after reservoir drawdown;
    b) Contact all residents and landowners within 1,000 feet of the reservoirs;
    c) Identify potentially affected groundwater wells;
    d) Monitor groundwater levels at a minimum of 10 locations within the 1,000 feet radius for at least two months before drawdown activities, and continue monthly monitoring for at least two years;
    e) If necessary, mitigate groundwater impacts.
- The geotechnical engineering concerns indicated by PG&E (*i.e. landslide at the left abutment*) being presented as a reason for dam removal have not been subjected to adequate technical scrutiny. The original designers and constructors were apparently aware of the landslide-prone areas and have re-aligned the dam with a kink in it in an effort to avoid the higher risk area.
- The removal of the abutment structure will require more detailed evaluations including abutment removal sequence and phasing plan, temporary excavation support systems for worker safety, slope stability analysis for each stage of the proposed removal, permanent slope support systems, and ground movement monitoring and alarm systems. During removals, there is a high risk of triggering landslides. Proper restoration and re-vegetation of these slopes to their original condition may involve complete removal of the abutment.
- Upon removal, the existing slopes all around the basin will be subject to higher risk of landslides. This risk may be heightened during or soon after water release due to rapid drawdown conditions. The slope conditions of currently submerged areas need to analyzed and remedial grading should be developed accordingly.
- Alternative options should be further evaluated, as they can provide a well-balanced remedy to many of the geotechnical and geologic concerns.
- PG&E needs to conduct targeted and dam-specific subsurface investigations as a crucial part of this process in the absence of existing documentation to support the current conditions.
- Debris management needs to be considered as part of the removal process, including any disposal or reuse of the demolished concrete of the dam, other structures, material found at recreational facilities, and any material (*including solid waste*) discovered during sediment removal. PG&E proposes the bulk of the dam material would be stored and capped on PG&E lands. Land disposal of waste in California is regulated under California Code of Regulations Title 27, CEQA and County ordinances. PG&E should detail their planned permitting process for disposal of non-hazardous waste on PG&E lands.
- PG&E needs to evaluate risks associated with triggering slides when removing the dam and when cleaning out sediments. The Application to Surrender License does not provide details on evaluating these risks, it notes the exposed reservoir bed would be susceptible

to erosion and proposes to define specific mitigation measures in management plans that will be prepared in the future.

- Additional investigations and planning are needed to protect against a potential release of Naturally Occurring Asbestos (NOA) which is known to occur within the Lake Pillsbury watershed. A NOA management and mitigation plan would need to be developed to mitigate the potential impacts during the dam decommissioning process. The Draft Application for Surrender of License mentions there is serpentinite rock in the area of Scott Dam but does not consider the potential impacts of disturbing asbestos containing rocks or the potential risks of releasing asbestos into the air during construction.

3.7 Geomorphology

- Better understanding of current conditions of the dam and the lake will be crucial to support any proposed dam removal process. PG&E's proposed conceptual approach lacks sufficient baseline studies on the amount and quality of sediments impounded in Lake Pillsbury.
- PG&E needs to complete a comprehensive sediment risk analysis for the proposed action. The United States Bureau of Reclamation recommends an iterative, risk-based approach for evaluating and managing sediment impacts from dam removal projects in its *Dam Removal Analysis Guidelines for Sediment* (Bureau of Reclamation, 2017).
- The application notes "PG&E would develop a Scott Dam Slope Stability Monitoring Plan that would include the following measures to address and reduce the potential for reactivating the landslide and to protect worker safety." The details should be provided by PG&E to better understand the proposed plan.
- The application notes "Water surface elevations would continue to decline after the dam is removed. Without the impoundment, the denuded slopes surrounding Lake Pillsbury and the exposed reservoir bed would be susceptible to water and wind erosion, especially as the soils dry." The details should be provided by PG&E to better understand the proposed plan.
- The PG&E Draft Application for Surrender of License would need to address sediment impacts to water quality, erosion and transport following dam removal, and any mitigation alternatives such as sediment stabilization or removal.
- To analyze the effects of sediment transport, PG&E relies on the 2-year event scenario modeled by Stillwater Sciences (2021c)[11], which it acknowledges differs from the Proposed Action. Because the method of dam removal heavily affects sediment erosion and transport modelling, PG&E should model the final removal approach and determine sediment-related impacts.
- PG&E will need to evaluate sediment grain size distribution. Additional field studies would be needed to properly evaluate the relative proportions of coarse and fine sediment impounded behind Scott Dam, which will affect transport of sediments. If the lake is drained, there would be increased landslide hazards of the currently submerged slopes. These risks would be increased in a similar fashion to lowered safety factors for any slope under drawdown conditions. This may involve long-term maintenance efforts in the wet

[11] Stillwater Sciences. 2021c. Hydraulic model development and potential flood implications following the proposed Scott Dam removal, Eel River, California. Technical memorandum. August 2021. As referred to in PG&E, 2025.

seasons. Such slope failures or slumps would increase the volume of materials that have to be managed, in addition to the already inordinate amounts of sediments that must be mitigated. Other geotechnical issues to be looked at include the stability of submerged slopes when the lake is drained.

- Potential scour at or near the toes of future slopes needs to be addressed as it can be a triggering factor for landslides.

3.8 Land Use

- PG&E noted that "The Proposed Action may result in unavoidable adverse effects to local fire suppression to properties near Lake Pillsbury due to the replacement of Lake Pillsbury with the Eel River or other sources as a water source, resulting in potentially longer fire response times." The loss of Lake Pillsbury water availability would have significant wildfire suppression adverse impacts on infrastructure, property, and human life. Below is an analysis of the key impacts that PG&E need to include in their analysis:
    - Keeping small wildfires small is vital in the County of Lake due to the history of wildfires in the area. Federal, state and local fire resources have all worked together in the past to combat the many large campaign fires that have brought stress to the communities that have been affected.
    - Dry lightning around the Lake Pillsbury area poses the greatest risk for large scale wildfires in the area due to their unpredictability. Lightning fires can spark a large-scale wildfire in very remote areas of the Mendocino National Forest and have the potential to grow rapidly with fuel and topography alignment. Dry Lightning is a natural occurring event in California and is always a threat to the wildland every year.
    - The County is already prone to having water availability problems due to the wildland rural community interface that affects the populace that call the area home. Water availability directly correlates with fire department resources efficiency to fight fire in a rural area. Large fires that develop near Lake Pillsbury can grow (*and historically have grown*) exceptionally large due to the difficult access and topography aspects that promote fire growth.
    - Since its creation, Lake Pillsbury has always been utilized as a water resource because it reduces flight or drive time to resupply water to combat fires in the surrounding area. Extended fire attack operations that take place around Lake Pillsbury benefit from and rely on the lake as a primary water source because of reduced drive time for ground resources to refill their apparatus with water. Additionally, not having a body of water available to fire resources will always change fire strategies. Mitigating fire threats in rural locations always makes fire attack operations difficult for firefighter safety.
    - In the Lake Pillsbury area, the first suppression resource on scene of a fire will most likely be a fire engine. There exists a direct mutual aid agreement allowing both US Forest Service and CAL FIRE to respond regardless of jurisdiction. The first responder could be one of the helicopters from CAL FIRE. Because of the limited resources in the more rural areas, the helicopter resource becomes a critical initial attack resource. The closest fire station to Lake Pillsbury is a USFS station 2.6 miles/9 min drive to Lake Pillsbury. The closest CAL FIRE helicopter air support is in Willits, Ca. The estimated flight time for a Sikorsky S-70 Firehawk helicopter from Willits to Lake Pillsbury is approximately 8 to 10 minutes,

depending on specific conditions and flight paths. CAL FIRE's helicopter attack (Helitac) philosophy incorporates specific goals for air resources, enhancing their effectiveness in wildfire management. Their number one goal is a rapid response. Specifically, it is used to achieve a quick initial attack on wildfires, keeping most fires at 10 acres or less. Helicopters can reach remote fires in approximately 20 minutes, allowing for timely intervention.

  - The distance from Clear Lake to Lake Pillsbury is approximately 20 miles. Given that the Sikorsky S-70 Firehawk has a cruise speed of around 150 to 160 knots (approximately 173 to 184 mph), the estimated flight time for a Sikorsky S-70 Firehawk from Clear Lake to Lake Pillsbury is approximately 6 to 7 minutes, depending on specific conditions and flight paths. Given the spacing between fire stations, and the windy roads, the next fire engine to respond to a fire in the surrounding areas adjacent to Lake Pillsbury will be 20+ minutes away. Rotary wing and fixed wing aircraft play a pivotal roll in helping control the spread of a fire. Helicopters can get water from many sources, sources as small as a swimming pool. However, smaller water sources may only allow for one or two dips.
  - Another issue with water sources for the fire service is cross-contamination. In California, aircraft used for firefighting must adhere to strict guidelines to prevent cross-contamination of water from different sources, such as lakes or reservoirs. Firefighting aircraft are required to identify and use designated water sources that have been approved for firefighting purposes. To prevent contamination, aircraft must avoid collecting water from multiple sources in a single mission. This means they should not dip from different lakes or reservoirs in one operation. For CAL FIRE's fixed wing resources, the CL-415 Super Scooper is utilized, and these aircraft are able to scoop water from a larger water source. The scoopers response time is a little slower than the Helicopters, but they can dump more water on a fire than a helicopter. It would take about 20-25 minutes to fly from a nearby airbase to wildfires adjacent to Lake Pillsbury. For fires north of Lake Pillsbury there are fewer larger lakes and greater distances between fire stations.
  - Removing Scott Dam, eventually leading to Lake Pillsbury ceasing to exist, would increase fire behavior in the area due to the exposed lakebed. Invasive plant species already are well established in the area that can contribute to erratic fire behavior. Previous fires like the August Complex and the Mendocino Complex have already burned an exceptionally sizable portion of the Mendocino National Forest. Additionally, invasive brush and grass species will grow in these burn scars and create a bigger problem for wildfire, and in return make wildfire difficult to mitigate with ground and aerial resources. Ecosystems will be affected when taking a water source from the area, which means drier fuel moisture content that can increase fire behavior with certain types of fuel models. The largest fire in the State of California was the Mendocino Complex Fire. Without the Lake Pillsbury water, the potential exists for a similar situation. This makes Lake Pillsbury an important resource for the fire service and its loss will have long-term adverse wildfire suppression impacts.

- There are additional Wildfire Suppression-related adverse Impacts on infrastructure, property, and human life, as noted below (these should be addressed by PG&E):
  - Increased Wear on Aviation Equipment: Helicopters would need to fly an additional 40 miles to access water, leading to increased operational wear and tear on rotors,

engines, and other critical components. This could shorten equipment lifespan and increase maintenance costs, reducing overall readiness.

- Strain on Fuel Infrastructure: The additional flight distance increases fuel consumption, which could strain local aviation fuel supplies and necessitate more frequent refueling, delaying firefighting operations.
- Delay in Other Emergency Responses: With helicopters occupied for longer periods, there would be reduced availability for other critical missions, such as evacuations or medical response.
- Delays in Fire Containment: The additional round-trip distance to collect water translates to slower response times for suppressing fires, increasing the likelihood of wildfires spreading. This could result in greater destruction of homes, businesses, agricultural lands, and critical infrastructure (*e.g., power lines, roads*).
- Increased Costs of Fire Damage: Larger, uncontrolled wildfires typically lead to greater property losses and more extensive rebuilding efforts, which can strain local and state resources.
- Increased Risk to Residents: Delayed fire suppression increases the danger to residents, especially in rural areas where evacuation routes are limited. Lives could be lost or disrupted due to a lack of timely intervention.
- Helitac Crew Safety: Longer flight distances increase fatigue for Helitac crews, raising the risk of accidents during firefighting operations. The additional flight time also increases exposure to hazardous conditions, such as smoke, turbulence, and heat.
- Health Impacts from Smoke: Slower containment of wildfires leads to prolonged exposure to wildfire smoke for residents, exacerbating respiratory and cardiovascular issues, particularly among vulnerable populations.
- Loss of Natural Resources: Delayed fire suppression can lead to the loss of forests, watersheds, and wildlife habitats, which are critical for local ecosystems and the area's economy.
- Economic Hardship: The destruction of property and infrastructure could result in significant economic hardship for affected communities, including loss of jobs, reduced tourism, and increased insurance premiums.

- The decommissioning project will require several road improvements to ensure safe execution during the project and to maintain accessibility for emergency wildfire response, recreation, and other purposes afterward. Below is a breakdown of the necessary road improvements that PG&E will need to incorporate in future road improvements:
  - Fire Access Road accessibility around Lake Pillsbury is a concern for emergency response and must be upgraded to allow rapid emergency response. Roads always pose concern for emergency vehicles due to the difficulty in turning fire engines, if needed. Constructing or upgrading fire access roads with all-weather surfaces will ensure year-round usability. Adding turnouts and passing lanes on long, narrow roads will improve emergency vehicles safe passage.
  - Encroaching vegetation will also need to be cleared from high priority areas to reduce fire risk and improve visibility for emergency responders.

- Recreational access roadways post-decommissioning, to include trailhead and parking access may be changed or require modifications to parking lots and trailheads. Improvements may need to be made, including creating or improving parking facilities and access points for hiking, fishing, and other activities, and installing clear signage to direct visitors to new recreation areas.
- If the decommissioning affects current road alignments (*e.g., roads become submerged or rerouted due to reservoir changes*), new road sections may need to be built. Any unpaved or poorly maintained roads in the area must be upgraded to meet CAL FIRE standards for emergency access. The decommissioning project will require significant upgrades to roads and related infrastructure to ensure safety during construction and maintain accessibility afterward. Improvements such as road widening, weight-bearing capacity increases, emergency access enhancements, erosion control, and vegetation management will be essential. These upgrades will not only support the decommissioning project but also ensure the long-term usability of the area for wildfire response, recreation, and other community needs.

- The removal of Lake Pillsbury as part of the PG&E Scott Dam Decommissioning Project raises valid concerns about wildfire spread, particularly the loss of the Lake's role as a barrier to prevent small fires from becoming larger events, according to United States Forest Service and Lake Pillsbury Fire Protection District personnel. The lake has frequently acted as a natural firebreak, slowing or stopping the spread of wildfires. Without the lake, vegetation would replace the reservoir basin, potentially increasing fuel loads and creating a continuous pathway for fire spread. Below is an analysis of the technical considerations to address wildfire concerns and the feasibility of retaining or reconfiguring the lake to meet both wildfire mitigation and seismic safety goals that must be considered by PG&E:
  - Vegetation Management: Implementing rigorous fuel reduction measures (*e.g., controlled burns, mechanical thinning*) in the lake basin and surrounding areas to reduce fire risk.
  - Establishing permanent firebreaks where the lake currently acts as a barrier.
  - Strategic Water Storage: Constructing smaller reservoirs, ponds, or water tanks within the region to provide accessible water for firefighting.
  - Installing dry hydrants and ensuring sufficient water storage for aerial and ground crews.
  - Infrastructure Upgrades: Setting up permanent firefighting staging areas with water access near the former lakebed.
  - Enhanced Detection Systems: Installing advanced fire detection systems, such as remote cameras, infrared sensors, and drones, to monitor for lightning-related ignitions.

3.9 Recreation Resources

- PG&E is planning to remove the existing camping facilities. This would result in a significant recreation impact. PG&E should reconsider the removal of existing recreation facilities. To reduce recreation impacts, PG&E should include recreational elements in the Restoration Plan they intend to develop. The plan should be developed to offset the loss of recreational facilities, such as swimming opportunities, hiking, picnicking, off-road

vehicle paths, camping and fishing. This plan needs to be developed in coordination with both USFS/Mendocino National Forest (MNF) staff and the County of Lake.

- PG&E is preparing a Restoration Plan – within this plan, PG&E should add elements that offset the loss of recreational facilities, such as swimming opportunities, hiking, picnicking.
- The PG&E draft application and environmental reports need to address loss of revenue generated by visitor usage and similar losses that will be experienced in the area.
- Recreation needs to be quantified as value revenue loss. PG&E should provide compensation to the County of Lake for the loss of recreation. Other locations offering similar lake-based recreational opportunities are a 45-minute to 2-hour drive from Lake Pillsbury, and include Clear Lake, Lake Sonoma, and Lake Mendocino. PG&E has provided no information regarding recreational activities, facilities, visitor usage, etc. regarding these other facilities. PG&E should discuss the potential for overcrowding at these other facilities due to closure of recreational facilities at Scott Dam.
- The Scott Dam Area includes Scott Dam, Lake Pillsbury, and the surrounding recreation facilities.
- Recreation opportunities in the Project vicinity are concentrated around Lake Pillsbury, which inundates land primarily owned by PG&E but is surrounded by public land managed by the US Forest Service.
- Lake Pillsbury is the largest waterbody in the MNF and provides a variety of reservoir-based recreation opportunities such as, boating, wind surfing, fishing, and swimming. There are a variety of developed recreation facilities in the immediate area of Lake Pillsbury, including family campgrounds, group campgrounds, and day-use opportunities.
- All Project recreation facilities (including campgrounds and day-use areas), ancillary facilities, and associated access roads in the Scott Dam area would be removed and the sites would be restored.
- Construction activities associated with removal of the recreation facilities and ancillary features are anticipated to last for approximately 2 years in duration and would occur at the same time as the dam removal construction activities.
- A Construction Recreation Plan should be developed and implemented that will include public notification measures, such as announcements and postings of the Project construction schedule and closure areas, and educational signage that informs recreationists about Project activities.
- PG&E will also develop a Public Safety Plan that will include measures to address and reduce potential safety risks to the public during construction.
- PG&E could reduce temporary recreation impacts by leaving recreational facilities within the Project Area and developing a Recreation Plan to minimize recreational impacts.

3.10 Aesthetic Resources

- PG&E needs to incorporate the various proposed restoration activities to improve the aesthetic aspects of the decommissioning project. This consideration needs to be addressed within the NEPA and CEQA process.
- SLR recommends that PG&E include photo modelling/artist renderings of visual impacts following dam removal. A photo rendering was included for the Non-Project Use of Project

Lands subsection of the application. Similar renderings should be provided for the Scott Dam location.

- PG&E will need to prepare an ecosystem restoration plan that considers management of invasive species, and reintroduction of native and endangered species, along with management and stabilization of the lake sediments. Monitoring should be considered to evaluate the progress of revegetation, and any needed adaptation until vegetation is established in the areas affected by the Project.
- PG&E would need to properly address the restoration of all areas and items referenced in their preliminary restoration plan to the landowners' and the County's agreement.
- PG&E does not describe in this section how the Scott Dam area recreation facilities would be restored such as the campground, day-use areas, and associated roads and trails.
- Removing water bodies has a significant visual impact. Anything that is restored should be visually appealing. Small ponds and hiking trails could be help offset these visual impacts and should be included in a restoration plan.
- PG&E argues that no adverse effects to visual resources have been identified for Phase 2 of the Proposed Action. During Phase 2, visual resources will be impacted until final restoration is implemented. PG&E should note this impact and propose offsets. PG&E argues the overall impact would be temporary adverse effects during construction and long-term benefits as the rivers return to natural conditions and vegetation recovers. PG&E needs to provide a better justification for the offsets indicated with respect to the aesthetic aspects of the decommissioning project over a sufficient timeframe to allow for seed collection and responsible revegetation, as well as mitigation of invasive species.

3.11 Cultural Resources

- PG&E's proposed Historic Properties Management Plan will need to be reviewed for compliance and consistency with Federal and State environmental review requirements.

3.12 Tribal Resources

- PG&E's proposed Tribal coordination will need to be reviewed for compliance and meeting Federal and State environmental review requirements.

3.13 Socioeconomic Resources

- PG&E has not quantified Operation and Maintenance costs associated with areas that will be restored, where sediments will be disposed of, and where dam debris will be contained.
- PG&E states that the community way of life for residents surrounding Lake Pillsbury will likely be adversely affected both during and post construction. PG&E should identify proper compensation for current residents that may be impacted.
- PG&E states that river-based recreation, in the long term, may provide similar economic opportunity to reservoir-based recreation. PG&E also provided a study that "estimated that decommissioning of the Project would extend the rafting and kayak season on the Eel River by approximately 6 weeks…", which appears to be for a portion of the Eel River below Cape Horn Dam, and not for the Scott Dam area. With the absence of road infrastructure to access the river, any potential rafting and kayaking activity near Scott

Dam will be further reduced. Given that the loss of Lake Pillsbury will cause lost revenue from reservoir-based recreation for the County of Lake, and that the potential increase in river-based recreation may happen outside of County limits, PG&E will need to work with the County to identify the potential revenue loss for the County caused by the change in recreational activities from reservoir-based to river-based and conduct additional studies to identify mitigation measures associated with recreational activities for the water shed.

- PG&E states that "for recreationists who prefer lake-based activities", Lake Mendocino or Clear Lake "can provide substitute recreation opportunities." As many lake-based recreationalists from higher population centers currently travel to Lake Pillsbury from the west, most will likely go to Lake Mendocino instead. This would result in a loss of tourism and revenue to the County of Lake. Furthermore, Lake Pillsbury appeals to recreationists due to its remoteness, which these alternative lakes may not provide. PG&E has not accounted for this revenue loss.
- PG&E also states that "potential adverse affects can be offset with restoration of vegetation and site aesthetics (see the Restoration Plan) and with investment in river-based recreation infrastructure by local businesses." PG&E has not yet provided a Restoration Plan and appears to assume that restoration will involve investment by local communities. River based recreation infrastructure as part of the Restoration Plan should be prepared and set up funded by PG&E.
- PG&E ties the hypothetical fish abundance to an increase in recreational activities by stating that if "fish abundance in the Eel River were to improve in response to the Proposed Action and return to natural conditions, then economic opportunity associated with commercial and recreational fishing could also increase." This statement should be supported by additional studies to be performed to identify whether restoring the river is going to lead to additional fishing and if this would overcome the loss of lake fishing at Lake Pillsbury.
- The study identifies approximately 300 recreational homes and cabins surrounding Lake Pillsbury. PG&E has not defined how the impact area was identified. It is not clear how many other homes are in the surrounding hills that enjoy the aesthetics of the lake and are used recreationally by driving to the lake from a few miles away to enjoy boating, fishing, etc. A more detailed survey of the properties and of the people using the Lake should be conducted, with impacts documented on a map.
- In Section 3.3.13.6 of the application - Local Government Finance, PG&E have identified current revenue from property tax, lodging tax, sales tax and licenses, but have not evaluated how the lodging tax, sales tax, and licenses will be affected long-term. PG&E should consult with the County to obtain the correct tax information and incorporate it into the analysis.
- In Section 3.3.13.5, Table 3.13.3 of the application, PG&E shows that the County of Lake has a higher unemployment rate, poverty rate, and lower median income than the state average. PG&E has failed to quantify the effect of dam removal on these key economic indicators. These impacts need to be quantified, with mitigation measures identified and implemented by PG&E.

3.14 Environmental Justice

- PG&E has concluded that this is not an Environmental Justice community by comparing Lake County, Tract 1, Block Group 2 to the county average. PG&E should revise the

analysis to compare the census tract to a larger-scale reference community. At a minimum, this should include the region impacted by the project or the State of California, rather than county averages. This approach ensures a more comprehensive evaluation of potential disproportionate impacts on this community.

3.15 Air Quality

- The construction plans proposed by PG&E should address emissions from construction vehicles and other greenhouse gas aspects.
- Monitoring for airborne NOA and other asbestos will be required due to the presence of serpentinite rock in project construction areas and potential building demolition.

3.16 Noise and Vibration

- The construction plans proposed by PG&E should address noise and vibration from construction equipment and vehicles.

3.17 Traffic

- PG&E documented existing road infrastructure, transit and aviation facilities in the vicinity of Scott Dam and Lake Pillsbury area. However, the impact on access road infrastructure was limited to three access roads. PG&E should include all access roads and other infrastructure to facilitate the future restoration and use of the facilities.
- Regarding impacts of dam removal, PG&E will need to prepare inundation maps with respect to releases during dam drainage and removal, and evaluate the potential effects on road infrastructure, including road easements, culverts, bridges and other utilities.
- Once these effects are sufficiently evaluated, road and other infrastructure improvements deemed necessary to provide for consistent opportunity for ingress/egress by emergency services (*including United States Forest Service personnel*) and residents of/visitors to the area would need to be conducted prior to removal of Potter Valley Project Dams and Equipment. The application notes "[*sediment*] deposition can reduce the capacity of the river and floodways to transport water during periods of high rainfall, which can potentially cause localized flooding in areas that were previously unaffected. These changes can heighten the risk of flooding at downstream structures, such as bridges and road crossings". A Sediment/Channel Monitoring and Response Plan is proposed to monitor problematic levels and interventions.
- Roadwork improvements and modifications will be needed to accommodate the anticipated increased construction traffic and heavy equipment movement on local roads during the dam decommissioning. The general construction measures will include speed limits and dust control. PG&E proposes to prepare a Construction Transportation Management Plan and follow the General Construction Measures to mitigate transportation network effects. The construction transportation plan needs to include non-construction related traffic that is expected to be present in the vicinity of the Lake Pillsbury.

3.18 Marine Resources

- Impacts to Marine Resources are outside of the scope of this review.

3.19 Others

- PG&E will need to discuss the existing power grid in the area and provide mitigation measures for any impacts on the power grid due to dam and lake removal. PG&E notes that the project powerhouse has not generated power since May 2021, and the decommissioning would permanently eliminate generation capabilities. The Draft Application for Surrender of License does not explicitly state whether the vicinity of Lake Pillsbury is connected to the electrical grid.

4.0 Closure

SLR appreciates the opportunity to support the County of Lake on this important project. Please contact the undersigned if you have questions.

Regards,

SLR International Corporation

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