COUNTY OF LAKE
BOARD OF SUPERVISORS
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June 14, 2022

Richard Glick, Chair

Federal Energy Regulatory Commission

888 First Street, NE

Washington, DC 20426

Re: FERC Project No. 77

Dear Chair Glick:

The County of Lake is aware that United States Representative Jared Huffman wrote to you on or about February 16, 2022. You responded that his insights are essential to ensuring that the Commission's consideration of FERC Project 77 is both responsive and accurate. The County of Lake appreciated very much your statement that the Commission wishes to ensure that any action the Commission takes is in the public interest.

Given that response, the County of Lake, where Scott Dam is located and the County most likely to be harmed by injudicious actions designed to benefit only larger population centers, wishes to offer our insights as well.

Simply put, the removal of Scott Dam is not the only viable solution here and we fail to understand what is meant by a "compelling opportunity for environmental justice" espoused by Representative Huffman in his February 16, 2022 letter to you. The destruction of this dam will have extremely damaging environmental impacts in Lake County, will lay waste to the Lake Pillsbury community, and will result in the loss to Lake County of a considerable and crucial surface water resource in its fight to protect people and property from the devastation of wildfire. If "environmental justice" is to be taken for more than just pithy phrasing, it is clear the consequences which will be realized in Lake County if Scott Dam is removed will certainly not result in environmental justice for Lake County.

Moreover, no real weight is being given to the actual financial costs and the very real threat to our regional water security. Eel River water diverted from Lake Pillsbury ultimately flows into the Russian River, where it is then routed into pipelines supplying that water throughout Sonoma County and Marin County, into the taps of cities like Sonoma, Petaluma, and Novato.

Proponents of the Two-Basin Solution and the removal of Scott Dam voice as a certainty that this plan can meet the water needs of 600,000 people and seem to give almost no consideration to the considerable impacts of that "solution" to Lake County. Perhaps of more interest to the Commission, this plan fails to consider the history of the region and ignores the long-enduring caution that what's past is prologue.

In 1922, following the completion of Scott Dam, the Gravelly Valley of Lake County was filled to form what became known as Lake Pillsbury. The Lake County community of Hullville was destroyed when it was submerged under 125 feet of impounded Eel River water. At that time, it was investors from San Francisco who set this transformation into motion, already seeing the need for hydroelectric production to be used to power Ukiah and the diversion of water into Sonoma County. This system of dams and diversion became known as the Potter Valley Project.

Over the next century, the community of Lake Pillsbury developed along the shores of the destroyed town of Hullville. During this same time, development blossomed throughout Sonoma and Marin counties fueled by the Eel River-bolstered water supply of the Russian River.

In 1977, regional representatives presented testimony to Congress on the need for further strengthening of the water supply by constructing the Warm Springs Dam to create Lake Sonoma. Lake Pillsbury, Lake Mendocino, and Lake Sonoma have all come to form the backbone of Russian River's ability to meet an ever growing water demand. At that Congressional hearing, it was noted that prior to 1908, very little water flowed in the Russian River during the summer months and, in dry years, the river was usually dry. It was with the creation of Lake Pillsbury and the Van Arsdale diversion that water flowed in the Russian River throughout the summer months, allowing agriculture and recreational uses to flourish along the Russian River in Potter Valley, Southern Mendocino County, and Sonoma County.

Given that the history of the region, serious consideration must be given to the potential impacts of removing those very elements that made the Russian River a consistently viable water source. This is of crucial concern due to the multiplicity of massive wildfires in Northern California.

Proponents of the Two Basin Solution and the removal of Scott Dam want you to simply assume that the regional water supply would not be threatened by the dam removal. However, it is a historical pattern, and not merely an assumption, that the Eel River in Lake County may go dry and, without the water in Lake Pillsbury and Lake Mendocino, that risk will increase exponentially. The ongoing drought conditions and the unfortunately realistic prediction that the impacts of the continuing drought will continue for years in California belie any optimistic projections as to the sufficiency of water supply such that it can be argued that the impact of the removal of Scott Dam and the destruction of the water storage provided by Lake Pillsbury will be negligible. Lake Mendocino has dropped to and remains at historic lows in the midst of this drought. The worst-case scenarios of Lake Mendocino completely drying up nearly occurred last year and, as its water level continues to drop precipitously, remains an ongoing and substantial risk.

Proponents of the Two Basin Solution and the removal of Scott Dam want you to simply assume that the cost to remove the Scott Dam is cheaper than providing fish passage. Such an assumption is not grounded in fact or science. There are many cost-effective methods for fish passage in Lake County that were eliminated from further consideration because they were not viewed as the most desired outcome. Some of these, such as a trap & haul option, or pressurized transport systems, could be

implemented quickly without the need for the significant physical infrastructure associated with a fish ladder.

Proponents of the Two Basin Solution and removal of Scott Dam want you to simply assume that environmental impacts to Lake County will be minimal. Climate change has resulted in an increased fire season window and highlights the need for fire suppression during wildfire periods and increased control burning in off peak periods. This will require an adequate water pool as already exists at Lake Pillsbury. Geologic and soil resources must be considered. If Scott Dam is removed and Lake Pillsbury is destroyed, there will be significant issues related to erosion and sediment transport directly into the Eel River. The potential impacts to the flora and fauna presently thriving in this area once Lake Pillsbury is reduced to a mere trickle will be considerable. This area is home to elk, to eagles, and a panoply of plant life that depend upon an eco-system that includes a significant water resource.

The early cost estimates presented by the Two Basin Solution proponents offer nothing more than a broad range of costs and represent only an unsupported, albeit perhaps, well-meaning, guess. The removal of Scott Dam is estimated to cost anywhere from thirty million dollars to one hundred twenty million dollars. Although not given much attention by the Two Basin Solution proponents has been given to sediment removal and vegetation management, which are critical environmental remediations should Scott Dam be removed, those costs alone have each been estimated to fall within the incredibly broad range of twenty-five million to one hundred million dollars. What this means is that there is no present evidence to support a determination as to whether these costs will be eighty million dollars, three hundred and twenty million dollars, or some number in between. The range for all costs associated with the Two Basin Solution has been estimated to be anywhere between four hundred million dollars and five hundred twenty million dollars.

Finally, proponents of the Two Basin Solution and removal of Scott Dam argue that Scott Dam is unsafe. What they carefully omit is that the majority of dams in California, especially those of any substantive size, are considered high risk. Over 90% of the acre feet of dam water storage is classified as high risk. This alone cannot be the basis to begin eliminating water storage across the state.

The Two Basin Solution proponents demand the removal of Scott Dam and blithely ignore the consequences because they believe the consequences will only be borne by Lake County. Throughout this entire process, the County of Lake has been ignored, denied participation in any decision-making processes of the proponents, and relegated by them to the status of a minor player in actions that will have immediate and long-term future negative impacts in Lake County.

These same proponents have also chosen to ignore potential, even likely, negative impacts on their own constituencies as both the Russian and Eel Rivers are at risk.

The County of Lake is resolutely against rushing forward with the type of gamble supported by the proponents of the Two Basin Solution. The consequences raised here largely go unrecognized or, at best, are minimized through an unsupported optimism that no meaningful negative consequences could possibly result. Such a position is without support in the facts, environmental science, or the history of water in the State of California. If the destructive consequences to the County of Lake of this Two Basin Solution is not sufficient to justify a denial of the request to move forward with the decommissioning of Scott Dam, we respectfully ask that you consider whether, at a time when Northern California is plagued by drought and the constant threat of wildfire, this is time to move hastily forward

with such an ill-conceived demand for action. The negative impacts which will be created by the destruction of Lake Pillsbury, a significant surface water source, as well as the potential loss of water flow in both the Russian and the Eel Rivers are both substantial and readily foreseeable.

Sincerely,

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Chair, Lake County Board of Supervisors