VIA ELECTRONIC FILING

December 14, 2020

Ms. Kimberly D. Bose
Secretary, Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Potter Valley Project (FERC Project No. 77)
Responses to Comments on the Initial Study Report

Dear Secretary Bose,

In accordance with 18 CFR § 5.15(c)(5) Mendocino County Inland Water and Power Commission, Sonoma County Water Agency, California Trout, Inc., the County of Humboldt, California, and the Round Valley Indian Tribes (together, Notice of Intent Parties [NOI] Parties) hereby submit for filing Responses to Comments on the Initial Study Report (ISR) and study amendment requests for the relicensing of the Potter Valley Project (Federal Energy Regulatory Commission [FERC] Project No. 77).

The NOI Parties filed the ISR on September 14, 2020 and a revised ISR on September 15, 2020. The ISR summarized the status of implementing the FERC-approved Study Plan, summarized and provided study results that were available, explained any variances with implementing the studies, and presented proposed study modifications and two new studies to address changes to the proposed Project in support of relicensing.

On September 29, 2020, the NOI Parties held the ISR meeting with stakeholders and FERC staff to discuss study implementation status, findings, and variances; in addition to proposed study modifications and new studies designed to address changes to the proposed Project and associated study goals, objectives, and methods. A summary of the ISR meeting was filed with FERC on October 15, 2020 and included responses to comments received during the ISR meeting. Subsequently, 17 stakeholders filed comments on the ISR including: National Marine Fisheries Service, National Park Service, U.S. Fish and Wildlife Service, U.S. Department of Agriculture Forest Service, California State Water Resources Control Board, California Representative John Garamendi, Mendocino County Farm Bureau, Sonoma County Farm Bureau, County of Lake, City of Santa Rosa, Friends of the Eel River, Lake Pillsbury Alliance, and five individuals from the public. All comment documents were reviewed, individual comment text was entered into a response table, and a unique comment number assigned (e.g., National Marine Fisheries Service-1). The NOI Parties made a good faith effort to identify all of the significant comments that warranted a response and have provided a response to each of those comments in Attachment A - *Potter Valley Hydroelectric Project, Initial Study Report Comment Response Table* ("Response Table"). Comments that were not identified as warranting

a response from the NOI Parties included those that provided general background information; those related to the FERC process, regulations, or practices; those related to other regulatory processes; or comparisons with other hydroelectric Projects.

With this FERC letter and enclosed attachment, the NOI Parties provide responses to specific comments in Attachment A.

If you have any questions about this filing, please do not hesitate to contact the undersigned at the addresses or telephone numbers listed below.

Sincerely,

Grant Davis
General Manager
Sonoma Water
404 Aviation Boulevard
Santa Rosa, CA 95403
(707) 547-1900

Janet Pauli
Chair
Mendocino County Inland Water and Power Commission
P.O. Box 1247
Ukiah, CA 95482
(707) 391-7574

James Russ
President
Round Valley Indian Tribes
77826 Covelo Road
Covelo, CA 95428
(707) 983-6126

Curtis Knight
Executive Director
California Trout
360 Pine Street, 4th Floor
San Francisco, CA 94104
(415) 392-8887

Hank Seemann
Deputy Director-Environmental Services
Humboldt County Public Works Department
1106 Second Street
Eureka, CA 95501
(707) 268-2680

cc: Official Service List
Enclosure: Attachment A: Potter Valley Hydroelectric Project, Initial Study Report Comment Response Table ("Response Table")

ATTACHMENT A

POTTER VALLEY HYDROELECTRIC PROJECT, INITIAL STUDY REPORT COMMENT RESPONSE TABLE

This Page Intentionally Left Blank

Comment Number	Study (if applicable)	Comment	Response
National Marine Fisheries Service-1	general	The NOI Parties provided an Initial Study Report, which includes revisions to the previously Federal Energy Regulatory Commission (FERC)-approved study plan developed by Pacific Gas and Electric Company (PG&E), but does not include the specifics of those technical working groups and the associated timelines for completion. Because the proposed Project has changed significantly since relicensing began and that the majority of the PG&E studies have not been conducted as provided in the FERC-approved Study Plan outlined in § 5.15 (d)(1), National Marine Fisheries Service recommends FERC approve the study modifications outlined below.	Thank you for your comment. The NOI Parties look forward to working with National Marine Fisheries Service and other stakeholders toward the success of a Two-Basin Solution based on the shared objectives. Specific timelines and deliverables for the technical working groups are not yet developed.
National Marine Fisheries Service-2	general	Furthermore, there has been ongoing data development outside of the Federal Energy Regulatory Commission (FERC) licensing process (such as the Ad Hoc Process) relevant to the Potter Valley Project that may not be available to all those who are interested in, or are parties to, the licensing proceeding pending before FERC. FERC should direct the NOI Parties to file all relevant information and data developed outside of the FERC licensing proceeding, similar to what FERC requires to be included in the Pre- Application Document, including data the NOI Parties used to develop the Project Plan in the Feasibility Study.	The NOI Parties have used a wide variety of information to develop the Feasibility Study and the Project Plan, including confidential and Critical Energy Infrastructure Information (CEII) information provided by Pacific Gas and Electric Company (PG&E), and the results of confidential or closed-session discussions among and within the NOI Parties. The NOI Parties are committed to an open and transparent process and intend to furnish all publicly available information relevant to the Federal Energy Regulatory Commission process. Descriptions of new and modified studies provided in the Initial Study Report included updated relevant information when available. The NOI Parties will consider any additional relevant information brought forward to support the analyses proposed in new and modified studies. In addition, Technical Study Reports will include reference to resources used to support the analyses.
National Marine	AQ 1	National Marine Fisheries Service (NMFS) appreciates the willingness of the NOI Parties to continue Pacific Gas and Electric Company (PG&E)'s AQ-1 Hydrology and Project Operations Modeling study	The hydrology model that will be used in Study AQ 1 - Hydrology and Project Operations Modeling was developed in a transparent process by the

Comment Number	Study (if applicable)	Comment	Response
Fisheries Service-3		plan, which incorporated many of NMFS' requested study elements. We encourage the NOI Parties to continue to develop a project operations model that is transparent, open, and available to resource agencies and other interested parties. To the extent models and scenarios that have been developed outside the licensing proceeding are to be used in the Integrated Licensing Process (ILP), the NOI Parties should provide access to all supporting hydrology data and models to all interested parties, including the Federal Energy Regulatory Commission (FERC). Additionally, the NOI Parties should work with ILP participants to incorporate changes to model input and assumptions, as well as conduct new model runs to inform potential license conditions. NMFS also recommends that FERC requires the NOI Parties to conduct a third-party review and sensitivity analysis on the development, assumptions, and results of the hydrology and project operations model prior to submitting a final license application.	Congressman Huffman Ad Hoc Committee Water Supply Working group. An overview of the model is available at: http://pottervalleyproject.org/wp-content/uploads/2018/08/PvpResSim_Validation_20180829_4.pdf, and model results are available at: http://pottervalleyproject.org/wp-content/uploads/2020/02/Water-Supply-Modeling-Grp-Combined-Deliverables_Final.pdf. Additional hydrology information developed by Pacific Gas and Electric Company (PG&E) as part of Study AQ 1 is also available by request. The NOI Parties will continue to work with agencies and stakeholders to have an open, transparent process in the continued development of hydrology information and modeling, including any changes to model input, assumptions, and model runs. Study AQ 1 currently includes convening a technical modeling group to collaborate with while using the calibrated/validated HEC-ResSim model for simulating proposed operations and evaluating other operational alternatives, including climate change. The NOI Parties will provide the model and associated data to agencies and stakeholders if requested. An additional third-party review as part of the AQ 1 study is not proposed as the model development and calibration were extensively reviewed by the Ad Hoc Committee technical representatives, and the NOI Parties expect additional extensive review by technical working group members during study implementation.
National Marine Fisheries Service-4	AQ 1	National Marine Fisheries Service (NMFS) requests that fisheries impacts related to the Project bypass flows at Cape Horn Dam, include an assessment of fisheries objectives presented in Study AQ-5 Instream Flow. Specifically, this element should include fall and spring	Study AQ 1 - Hydrology and Project Operations Modeling currently includes assessing the potential effects of Scott Dam Removal and future Project operations (seasonal diversions) on Eel River

Comment Number	Study (if applicable)	Comment	Response
		flows, critical for salmonid upstream and downstream migrations, when Project operations may have the greatest influence on habitat and migration conditions between Cape Horn Dam and the Pacific Ocean. NMFS requests that the Federal Energy Regulatory Commission (FERC) and the NOI Parties ensure that the geographic scope of this study include the lower Eel River to properly assess the impacts of bypass flows on habitat and migration conditions during the fall and spring for adult and juvenile California Coastal Chinook salmon, Southern Oregon/Northern California Coast Coho salmon, and Northern California winter and summer run steelhead trout. The inclusion of the lower Eel River in the geographic scope, will allow an assessment of Project effects on adult and juvenile salmonid upstream and downstream passage; particularly, below the Middle Fork Eel River, which will be addressed in other Project studies (i.e. AQ 4 - Fluvial Processes and Geomorphology, AQ 5 - Instream Flows, and AQ 9 - Fish Populations).	hydrology from Scott Dam to the Middle Fork Eel River, and key locations downstream including Fort Seward and Scotia for certain times of year (see Lower Eel River Low Flow Hydrology Analysis).
National Marine Fisheries Service-5	AQ 1	Recent efforts by Round Valley Indian Tribes, and federal and state agencies resulted in short- term funding for the installation and operation of stream gages upstream of Lake Pillsbury and within Tomki Creek. We strongly encourage the Federal Energy Regulatory Commission (FERC) to require the NOI Parties to support long- term operation of these stream gages in both the Eel River and Rice Fork above Lake Pillsbury. This would include stream reaches upstream of Lake Pillsbury, within the reservoir's inundation footprint to inform an evaluation of potential diversion rates at Cape Horn Dam in meeting subsequent terms of a future license. Additionally, we strongly recommend continued operation of a stream gage within Tomki Creek near its confluence with the Eel River to evaluate the hydrologic impact on fall-run Chinook salmon passage, migration and spawner distribution associated with Project releases. Tomki Creek historically was a major producer of Chinook salmon which has significantly declined in recent years, possibly due to current Project flows. Tomki	The need for long-term streamflow monitoring and the operation and maintenance of flow gages could be considered during development of protection, mitigation, and enhancement measures in the License Application.

Comment Number	Study (if applicable)	Comment	Response
		Creek is a significant area of concern for National Marine Fisheries Service (NMFS) and will require essential hydrology information to develop license terms and conduct an eventual Endangered Species Act (ESA) consultation.	
National Marine Fisheries Service-6	AQ 1	We recommend that flow gages be installed in permanent monitoring locations that can be utilized through the duration of the next license and made available in real-time to resource agencies and the public. We recommend that the stage-discharge relationships established at each gage location be rated to the maximum discharge level necessary to evaluate project impacts. Discharge and stage-discharge relationships would be best accomplished by taking velocity measurements with an Acoustic Doppler Current Profiler (ADCP), as opposed to wadable equipment and protocols (which were proposed by the applicant). Using an ADCP to take velocity measurements at higher flows is a safer alternative, will allow measurements of higher velocities and is standard practice when developing a stage-discharge relationship at a gaging site.	Regularly updating rating curves and flow measurements for high flows are currently proposed in Study AQ 1 - Hydrology and Project Operations Modeling for the proposed period of operation. Also, please see response to Comment National Marine Fisheries Service-5.
National Marine Fisheries Service-7	AQ 1	We also recommend that the NOI Parties continue to use the operations model and any updated versions to run future scenarios that include removal of Scott Dam combined with projected climate change inflow hydrology. Unimpaired hydrology under future climate change has already been developed through the year 2099 by the California Water Science Center at the United States Geological Survey (USGS) and can be used as input to the operations model.	Study AQ 1 - Hydrology and Project Operations Modeling currently includes use of the operations model to assess future Project operations (seasonal diversions) and climate change on Eel River hydrology. The NOI Parties will coordinate with the technical working group (referred to as the technical modeling group in Study AQ 1) on model input parameters.
National Marine Fisheries Service-8	AQ 1	The NOI Parties should provide written documentation of the assumptions used in the operations model and how the magnitude and timing of the diversion at Cape Horn Dam will be implemented in the future. The NOI Parties should consult with all interested ILP parties to develop a range of potential future operations of the Project that can be represented by the operations model. Specifically, fall and spring diversion rates and the associated flow alterations	Documentation of operations model assumptions and parameters will be shared with stakeholders and included in a Technical Study Report. Alternative future Project operations scenarios will be assessed during implementation of Study AQ 1 - Hydrology and Project Operations Modeling and will inform development of proposed future operations, which

Comment Number	Study (if applicable)	Comment	Response
		downstream of Cape Horn Dam to the lower Eel River are of significant importance to National Marine Fisheries Service (NMFS) when evaluating impacts of potential hydrologic project operations under the ESA. Currently, under Study AQ-1 Hydrology and Project Operations Modeling, the Extent of the Study Area is defined as the Eel River from Scott Dam to immediately below the Middle Fork Eel River Confluence. This Extent of the Study Area is also stated in the ISR Meeting Summary question and answer section. We strongly request that the Federal Energy Regulatory Commission expand the Extent of the Study Area to continue to the estuary to adequately capture the seasonality of potential project hydrologic impacts to salmonids utilizing the mainstem Eel River.	will be included in the License Application. Hydrologic analysis of proposed Project operations using HEC-ResSim model in Study AQ 1 will focus on the reach from Scott Dam downstream to Cape Horn Dam, and existing United States Geological Survey gage data will be used to estimate flows downstream to the Middle Fork Eel River confluence for the period of record, and downstream to the Fort Seward, Scotia, and Fernbridge gaging stations during spring and fall periods. The Fernbridge gaging station is functionally at the Eel River estuary. Also, please see response to Comment National Marine Fisheries Service-14.
National Marine Fisheries Service-9	AQ 2	National Marine Fisheries Service (NMFS) appreciates the willingness of the NOI Parties to continue Pacific Gas and Electric Company (PG&E)'s AQ-2 Water Temperature study plan, which incorporated many of NMFS' requested study elements. We encourage the NOI Parties to continue to develop a temperature model that is transparent, open and available to resource agencies and other interested parties. To the extent models and scenarios that have been developed outside the licensing proceeding (such as the Ad Hoc process) are to be used in the Integrated Licensing Process (ILP), the NOI Parties should provide access to all supporting data and models to all interested parties, including the Federal Energy Regulatory Commission. Additionally, the NOI Parties should work with ILP participants to incorporate any changes to model input and assumptions, as well as conduct new model runs to inform potential license conditions.	Study AQ 2 - Water Temperature currently includes development of a physical-based temperature model (e.g., HEC-RAS, or comparable model) in consultation with the stakeholders (see Eel River Water Temperature Modeling). Modeling scenarios would also be developed in consultation with stakeholders. All data, model results, as well as completed model parameter files will be provided to stakeholders upon request.

Comment Number	Study (if applicable)	Comment	Response
National Marine Fisheries Service-10	AQ 2	We strongly encourage the Federal Energy Regulatory Commission (FERC) to require the NOI Parties to provide long-term support for the collection of continuous water temperature data in the tributaries upstream of Lake Pillsbury. This request is supported by NMFS' Effects of the Project and Related Activities on Water Temperature for Anadromous Fish Migration, Holding, Spawning, and Rearing Needs study request (found in our August 4, 2017 FERC submittal 20170811-0007). These data are of particular importance during the onset of the spring hydro-limb (e.g., in April) through the summer to evaluate the temperature regime of the Eel River following the removal of Scott Dam in developing potential licensing terms.	The need for long-term water temperature monitoring and the operation and maintenance of monitoring equipment could be considered during development of protection, mitigation, and enhancement measures in the License Application.
National Marine Fisheries Service-11	AQ 2	We also recommend that the NOI Parties use the temperature model to run future scenarios that include removal of Scott Dam combined with climate change inflow hydrology and water temperature. Unimpaired hydrology under future climate change has already been developed through the year 2099 by the California Water Science Center at the U.S. Geologic Survey (USGS) and can be used as input to the temperature model. Additional estimates of air and water temperature change under climate change have also been developed by the United States Forest Service (USFS) NorWest Project. In combination with these available resources and NMFS' recently completed Eel River thermal and habitat suitability model (FitzGerald et. al. 2020), the NOI Parties should be well equipped to fulfill this study element request.	Study AQ 2 - Water Temperature currently includes using the physical-based water temperature model to assess future operational scenarios that include removal of Scott Dam combined with climate change inflow hydrology and water temperature. The NOI Parties appreciate the identification of available information that may support the analyses. Model development and modeling scenarios will be developed in consultation with the technical working group (referred to as the technical modeling group in Study AQ 2).
National Marine Fisheries Service-12	AQ 3	The NOI Parties propose to utilize results from the water temperature modelling effort (described in AQ-2 Water Temperature) to inform how other water quality parameters might perform with a new diversion rate at Cape Horn Dam following the removal of Scott Dam and Lake Pillsbury. Generally, there are strong relationships between certain parameters, such as water temperature and dissolved oxygen (DO), however, other influences may confound these relationships.	Study AQ 3 - Water Quality currently includes utilizing results from water temperature modelling (Study AQ 2 - Water Temperature) to inform how other water quality parameters might perform under future project operations following the removal of Scott Dam and Lake Pillsbury. The NOI Parties believe the methods proposed in Study AQ 3 will provide

Comment Number	Study (if applicable)	Comment	Response
		For example, with a large biomass of algae in Lake Pillsbury, it is likely that DO levels are highly variable throughout the day in the lake and downstream river. Pacific Gas and Electric Company (PG&E) is collecting continuous DO from a vertical array in Lake Pillsbury near Scott Dam, which will provide useful baseline information in order to help predict future changes. The anticipated changes in algal biomass and corresponding amelioration of DO variability should also be modelled coincident with water temperatures based upon PG&E's data from 2020.	sufficient information on the magnitude and trajectory of change in nutrients, algal biomass, and dissolved oxygen (DO) to evaluate potential effects of the proposed Project. While the comment anticipates improved riverine water quality conditions associated with the removal of Scott Dam, the rationale for why the approach proposed in Study AQ 3 is insufficient to meet the information needs, and why additional water quality modeling is required to quantify potential changes (nutrients, algal biomass, and DO), is not provided.
National Marine Fisheries Service-13	AQ 4	National Marine Fisheries Service (NMFS) appreciates the NOI Parties continuing Pacific Gas and Electric Company (PG&E)'s proposed AQ-4 Fluvial Processes and Geomorphology study plan which incorporated many of NMFS' requested study elements pertaining to fluvial processes and geomorphology. We understand the NOI Parties propose to study the effects of potentially mobilizing 12 million cubic yards of sediment in Study AQ-12 Scott Dam Removal Assessment, via gathering new LiDAR and bathymetry data and running sediment transport models in addition to the other study elements listed below. It appears there could be overlap and opportunities to coordinate study AQ-4 Fluvial Processes and Geomorphology and AQ-12 Scott Dam Removal Assessment. Specifically, the data collected at the intensive geomorphic and riparian study sites that are outlined in the study plan for AQ-4 Fluvial Processes and Geomorphology could be used to inform the hydraulic and sediment transport model proposed in AQ-12 Scott Dam Removal Assessment.	Correct, Study AQ 4 - Fluvial Processes and Geomorphology and Study AQ 12 - Scott Dam Removal include related study elements that will be closely coordinated and when appropriate, information from Study AQ 4 including data collected at the intensive geomorphic and riparian study sites will be used to inform Study AQ 12.
National Marine Fisheries Service-14	AQ 4	We understand that study AQ-4 Fluvial Processes and Geomorphology (PG&E's Revised Study Plan Jan 15, 2018) contains a "Reservoir and Sedimentation and Sediment Yield" section that was previously focused on the coarse fraction of unimpaired sediment supply at	Study AQ 4 - Fluvial Processes and Geomorphology currently includes assessing sediment supply to the Eel River for key tributary basins downstream to the estuary. This sediment supply information will be used

Comment Number	Study (if applicable)	Comment	Response
		various points in the watershed. With the potential release of 12 million cubic yards of sediment, understanding the capacity of the Eel River to transport sand, slit and clay size particles relative to unimpaired conditions will be important. Therefore, we strongly support the NOI Parties proposal to develop a sediment budget that estimates the average annual sediment supply rates, sediment composition, and sediment transport capacity at key locations (i.e., sediment budget nodes) in the mainstem channel from Scott Dam to the Middle Fork Eel River and at select downstream long- term gaging sites (Dos Rios, Fort Seward, and Scotia). We also request that the spatial extent of the geographic study area extend to the estuary, as sediment loads resulting from dam decommissioning could have significant implications to lower Eel River adult salmonid staging pools and existing estuarine habitat.	to put the relative contribution of stored sediment potentially released by removing Scott Dam into the context of the basin-wide sediment supply under background conditions. Since the potential effects of releasing stored sediment from Lake Pillsbury following Scott Dam removal will diminish with distance downstream of Scott Dam, Study AQ 1 - Hydrology and Project Operations Modeling, Study AQ 4, and Study AQ 12 - Scott Dam Removal focus assessments on the 49-mile reach of the Eel River from Scott Dam to the Middle Fork Eel River. In addition, elements of Study AQ 1 and Study AQ 12 currently include investigating the potential effects of proposed Project on hydrology and sediment supply and transport characteristics at key locations downstream of the Middle Fork Eel River. Results from Study AQ 1 and Study AQ 12 will inform Study AQ 4 in assessing potential for changes to channel conditions downstream of the Middle Fork Eel River. The need to extend Study AQ 4 downstream of the Middle Fork Eel River will be dependent on the results of sediment transport modeling, sediment mass balance assessment, and hydrology assessment, and therefore is not proposed at this time. Accordingly, establishing additional Study AQ 4 intensive study sites and collecting additional site-specific information from the Middle Fork Eel downstream to the estuary (approximately 120 miles) may not be necessary and would be very expensive and therefore is not proposed at this time.

Comment Number	Study (if applicable)	Comment	Response
National Marine Fisheries Service-15	AQ 4	Pacific Gas and Electric Company's (PG&Es) AQ-4 Fluvial Processes and Geomorphology study plan did not provide a detailed study methodology for many study elements and the Federal Energy Regulatory Commission (FERC) did not mention study AQ-4 Fluvial Processes and Geomorphology in their February 15, 2018 Study Plan Determination. National Marine Fisheries Service (NMFS) suggests that the NOI Parties review and adopt the specific methodologies included in NMFS' Effects of the Project on Fluvial Processes for Anadromous Fish Habitat study request (found in NMFS' August 4, 2017 FERC submittal 20170811-0007) in light of the proposed removal of Scott Dam. The detailed study methodologies provided by NMFS are standard practice and were developed from relevant studies done elsewhere in California both inside and outside the ILP process.	Study AQ 4 - Fluvial Processes and Geomorphology currently includes the same or similar objectives and approaches to those included in National Marine Fisheries Service (NMFS) requested study "Effects of the Project on Fluvial Processes for Anadromous Fish Habitat." Study AQ 4, in combination with Study AQ 12 - Scott Dam Removal, incorporates both the quantitative analyses and conceptual models necessary to address the same study elements and key questions identified in the NMFS requested study. The methods proposed in Study AQ 4 and Study AQ 12 are standard practice and consistent with relevant studies implemented for recent hydroelectric relicensing projects throughout the Pacific states.
National Marine Fisheries Service-16	AQ 5	NMFS appreciates the NOI Parties identifying Instream Flow as a resource issue potentially impacted by the proposed Project operations. We further request the Federal Energy Regulatory Commission (FERC) to require the NOI Parties to emphasize how the proposed Project operations (e.g., diversion rates) might impact passage timing at Cape Horn Dam, and access to tributaries below and above Scott and Cape Horn Dam (e.g., Tomki Creek and Outlet Creek). How Project operations may affect habitat, distribute and/or delay essential migratory cues, and tributary connectivity for critical life stages of California Coastal Chinook salmon, Southern Oregon/Northern California Coast Coho salmon, and winter and summer run Northern California steelhead trout should be studied. We request that the Federal Energy Regulatory Commission (FERC) require the NOI Parties to evaluate the anticipated short-term instream flow conditions during the Scott Dam removal process and the level of impacts to aquatic resources at the appropriate de-construction time-scale. We also request that FERC require the NOI Parties to extend the geographic scope of this study to the Pacific	Study AQ 5 - Instream Flow currently includes assessing the effects of the proposed Project and potential future operations on stream flows and fish habitat as well as juvenile out-migration timing (see Instream Flow Modeling). Study AQ 7 - Fish Passage currently includes assessing the effects of the proposed Project and potential future operations on fish passage in the mainstem Eel River, including migration cues and timing, and access into key tributaries downstream of Scott Dam (see Critical Riffle Fish Passage and Tributary Confluence Fish Passage). The Study AQ 7 fish passage assessment will be informed by hydrologic conditions derived from Study AQ 1 - Hydrology and Project Operations Modeling. The potential impacts of the Scott Dam removal process on aquatic resources will be evaluated in the License Application. Study AQ 5 focuses on study sites between Scott Dam and the

Comment Number	Study (if applicable)	Comment	Response
		Ocean to properly assess impacts of long-term Project operations and bypass flows on habitat conditions downstream of Cape Horn Dam; particularly, during sensitive salmonid migration periods (i.e. fall and spring, and during low flow winters fall to spring.	Middle Fork Eel River, additional instream flow modeling sites are not proposed downstream of the Middle Fork Eel River. However, Study AQ 1 includes assessing how future Project operations would affect flow conditions in the Eel River downstream of Scott Dam, and will include assessing the effects of Project operations on flow conditions during spring and fall months at key locations downstream from the Middle Fork Eel River, including Fort Seward, Scotia, and Fernbridge.
National Marine Fisheries Service-17	AQ 5	We believe that understanding the relationships between the physical and biological parameters identified in this Feasibility Study (and study element) is important for the proper evaluation of proposed Project operations that are potentially limiting to salmonid production. However, we recommend an Instream Flow study that incorporates a production capacity model, such as a life- cycle model (LCM). An LCM can provide an effective management tool that incorporates all potential constraining parameters, including flow, and has the capacity to identify the most limiting constraints on a particular salmonid life stage within a given Project scenario. This type of tool will also provide National Marine Fisheries Service (NMFS) and other resource agencies with information to properly evaluate alternative Project scenarios (most notably passage and bypass flow scenarios) with defensible scientific merit. Therefore, we recommend, to the extent possible, inclusion of a production capacity model or LCM in combination with the described Instream Flow study. The development of a production capacity model could be expanded to the greater Eel River watershed, which would support the objectives of the Fisheries Restoration Plan described in the NOI Parties Feasibility Study. Please see the recent paper by Fitzgerald et. al. 2020, titled: Thermal and habitat suitability for anadromous salmonids in the dammed and inaccessible Upper Mainstem Eel River	Study AQ 9 - Fish Populations currently includes developing a conceptual life cycle model and analysis framework in collaboration with a technical working group. However, at this time, implementation of a production capacity life cycle model is not proposed due to the large spatial extent and high cost ($150–250k). Study AQ 5 - Instream Flow does propose to expand on the Physical Habitat Simulation (PHABSIM) model and foothill yellow-legged frog (FYLF) studies by using 2-D modeling and water temperature model output at the FYLF study sites to evaluate habitat and productivity of juvenile salmonids in relation to streamflow. The specific methods of this new analysis will be developed in collaboration with the technical working group.

Comment Number	Study (if applicable)	Comment	Response
		subbasin in the Eel River Basin, California for an example of a production capacity model.	
National Marine Fisheries Service-18	AQ 6	National Marine Fisheries Service (NMFS) appreciates that the NOI Parties proposed removal of Scott Dam is identified as the best and most efficient means of fish passage at this facility based on the finding of the Potter Valley Project Ad Hoc Committee: Fish Passage Profiles Evaluation Report (December 2019). We agree with the proposed deletion of this study because the Project Plan proposes to eliminate Lake Pillsbury; however, removal of Scott Dam will likely need to occur in phases over an extended period of time, which may create short-term adverse habitat conditions for salmonids. Therefore, we request that the Federal Energy Regulatory Commission require the NOI Parties to include a proper assessment of habitat conditions within the boundaries of the Lake Pillsbury footprint during Scott Dam removal activities within the appropriate time-scale context. This assessment could be included into the AQ-12 Scott Dam Removal Assessment or be a standalone study. Moreover, this type of assessment will be needed for resource agencies to properly evaluate impacts during dam decommissioning activities. Therefore, we strongly encourage that the NOI Parties consult with NMFS and California Department of Fish and Wildlife (CDFW) on a potential fish relocation and/or fish salvage plan.	Study AQ 12 - Scott Dam Removal will assess the potential effects of releasing stored sediment resulting from Scott Dam removal under different removal alternatives (one-time and phased) and inform the potential need for sediment management and mitigation measures. These study results and supplemental information on expected habitat conditions within the reservoir footprint will inform developing the decommissioning plan that details how removal of Scott Dam would occur and will inform how habitat conditions for salmonids may be affected. The potential environmental effects of Scott Dam Removal will be addressed in the License Application. The need for a fish relocation and salvage plan could be addressed during development of protection, mitigation, and enhancement measures, in consultation with National Marine Fisheries Service, California Department of Fish and Wildlife, and other resource agencies.
National Marine Fisheries Service-19	AQ 7	National Marine Fisheries Service (NMFS) supports the goals and objectives of Study AQ-7 Fish Passage proposed by the NOI Parties and the acknowledgement that the Cape Horn Dam and Van Arsdale Fishway are inadequate for the long-term viability of salmonids upstream of this facility. Therefore, we agree with the elimination of some, but not all, of the previously proposed field studies (see DIDSON sonar element discussed below) by Pacific Gas and Electric Company (PG&E) associated with Cape Horn Dam passage evaluation and re-licensing. We note that ongoing fish passage studies	Study AQ 7 currently includes establishing a fish passage technical working group composed of stakeholders knowledgeable in issues related to fish passage, including agency scientists and engineers. The purpose of the technical working group is to share knowledge and ideas including new and recent research, to inform study implementation including developing improved upstream and downstream fish passage designs. The NOI parties are committed to

Comment Number	Study (if applicable)	Comment	Response
		conducted by the United States Fish and Wildlife Service, California Department of Fish and Wildlife, and NMFS could assist with the evaluation of improved upstream and downstream fish passage alternatives by providing greater insight to the timing and passage approach by salmonids and Pacific lamprey. We strongly encourage the NOI Parties to engage these agencies as research findings become available that could inform modifications to the facility intended to meet the needs of the targeted species and appropriate life stages. Due to recent issues observed (PG&E 2020) with the delayed downstream passage of steelhead kelts (post-spawn steelhead), we request that the Federal Energy Regulatory Commission ensure that the NOI Parties evaluate the kelt life stage equally with all other species and life stages included in the overall evaluation of improved fish passage alternatives.	evaluating the steelhead kelt life stage equally with all other species and life stages included in the overall evaluation of improved fish passage alternatives.
National Marine Fisheries Service-20	AQ 7	Regarding the overall evaluation of improved fish passage alternatives at Cape Horn Dam, we believe the regulations clearly direct the Federal Energy Regulatory Commission and the applicants to conduct a thorough analysis of “all reasonable” alternatives and a detailed impact assessment.	Please see response to Comment U.S. Fish and Wildlife Service-2.
National Marine Fisheries Service-21	AQ 7	To accomplish this the Federal Energy Regulatory Commission should analyze alternative(s) for current fish passage and diversions at Cape Horn Dam. The Federal Power Act (FPA), ESA, Magnuson-Stevens Fishery Conservation and Management Act (MSA), Fish and Wildlife Coordination Act (FWCA), and National Environmental Policy Act (NEPA) together require the Commission to consult with resource agencies on effects to endangered and threatened species, to consider the environmental impacts of their proposed actions and reasonable alternatives to those actions, and to consider comment from the public when processing applications for licenses for hydroelectric projects. In order to meet these obligations, the Commission has developed regulations that require applicants for	Thank you for your comment.

Comment Number	Study (if applicable)	Comment	Response
		both original and relicenses to consult with resource agencies, affected Indian Tribes, and the public on project design and operations, the impacts of the proposed project on the environment, environmental protection, mitigation and enhancement, reasonable hydropower alternatives, and the studies needed for all the foregoing. 18 CFR §16.8.	
National Marine Fisheries Service-22	AQ 7	Regarding the need to fully evaluate the range of potential changes to Project structures and operations, under NEPA, the Commission must disclose and analyze a full range of alternatives. According to a frequently-consulted guidance memorandum from the Council on Environmental Quality (CEQ): Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.	Thank you for your comment.
National Marine Fisheries Service-23	AQ 7	In order to compare the relative impacts of each passage and water diversion alternative, the degree of analysis devoted to each alternative should be substantially similar to that devoted to the "proposed action." Section 1502.14 (b) of the Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations specifically requires "substantial treatment" of each alternative including the proposed action. Accordingly, monitoring and modeling must be adequate to develop a full range of reasonable alternatives and compare the relative impacts of each. These alternatives include facility and or operational change scenarios proposed by National Marine Fisheries Service (NMFS) and other stakeholders. The reasonableness of these scenarios should be	Thank you for your comment.

Comment Number	Study (if applicable)	Comment	Response
		viewed in light of the various planned and current restoration actions occurring in the basin.	
National Marine Fisheries Service-24	AQ 7	Regarding the need to conduct comprehensive project impact studies, the Code of Federal Regulations (CFR) at 18 CFR 16.8(b)(4) directs interested resource agencies to provide a potential applicant with written comments on needed studies. National Marine Fisheries Service (NMFS) has identified studies that are necessary to assess the environmental and biological consequences of the proposed relicensing and herein written responses to the Federal Energy Regulatory Commission's Initial Study Report and Initial Study Report Meeting Summary. The legislative history of the FPA supports a detailed and comprehensive environmental evaluation. The Electric Consumers Protection Act conference report notes that "in exercising its responsibilities in relicensing, the conferees expect the Commission to take into account existing structures and facilities in providing for these non-power and non-developmental values." Consistent with this legislative imperative, the Commission must also fully evaluate the environmental harms caused by these structures and facilities, in order give "equal consideration" of non-power values as mandated by FPA section 4(e) and must evaluate relicensing issues "in light of today's standards and concerns," and that "procedures and substance applicable to original licenses, including the treatment of non-developmental values, apply fully in relicensing." H.R.Rep. No. 99-507, at 33-34 (1986), reprinted in 1986 U.S.C.C.A.N. 2496, 2521.	Thank you for your comment.
National Marine Fisheries Service-25	AQ 7	Further, the applicant must conduct its studies in a timely fashion because under the applicable statute and case law, the Commission cannot issue its License for this project absent an adequate evaluation of potential Project impacts. Interpreting the Federal Power Action (FPA), the Ninth Circuit Court of Appeals has held that "[t]he law, then is well-defined: Prior to issuance of a new license, the Federal Energy	Thank you for your comment.

Comment Number	Study (if applicable)	Comment	Response
		Regulatory Commission (FERC) must study the effect of a project on the fishery resource and consider possible mitigative measures." Confederated Tribes and Bands of the Yakima Indian Nation v. FERC, 746 F.2d 466, 471 (9th Cir. 1984). The Commission cannot issue a hydroelectric license while deferring consideration and implementation of fishery protection measures; rather, the Commission is required to make detailed inquiries in the licensing proceeding. There can be no question that fishery protection is among the licensing issues that must be addressed when evaluating whether issuance of a license will serve the public interest in a river basin as required by § 10(a) of the FPA.	
National Marine Fisheries Service-26	AQ 7	Regarding improved fish passage and water diversion alternatives that should be analyzed under National Environmental Policy Act (NEPA) and the Federal Power Act (FPA), considering the several recent and prolonged fish passage closures at Cape Horn Dam due to debris load issues, National Marine Fisheries Service (NMFS) believes exploring a Cape Horn Dam removal option, while redesigning the diversion infrastructure is a reasonable and feasible alternative for achieving a "two basin solution". Therefore, we expect this alternative to be fully analyzed during the licensing process. Pursuant to our responsibilities and authorities under the Endangered Species Act (ESA), Federal Power Act (FPA), Magnuson-Stevens Act (MSA) and Fish and Wildlife Coordination Act (FWCA), NMFS will be focusing on optimizing "safe, timely and effective" fish passage through all project impacted stream reaches, to allow anadromous fish achieving adequate opportunity to navigate upstream reaches as they ascend to essential high-quality habitats.	Please see response to Comment U.S. Fish and Wildlife Service-2.
National Marine Fisheries Service-27	AQ 7	Clearly, unobstructed volitional fish passage (i.e., Cape Horn Dam removal) represents the best option for all anadromous fish species, but it's also important to note that impaired fish passage isn't the only impact to the aquatic ecosystem caused by dams that have the	Thank you for your comment.

Comment Number	Study (if applicable)	Comment	Response
		potential to result in "take" of federally ESA-listed salmonids. For instance, the current Cape Horn Dam/Van Arsdale Reservoir and facilities are known to create "hot spots" for invasive predatory fish (i.e., pikeminnow and bass) , where juvenile salmonids can easily be ambushed. National Marine Fisheries Service (NMFS) supports a "two basin solution" and is ready to assist the Federal Energy Regulatory Commission, the NOI Parties, and other stakeholders on these complicated fish passage and related issue. Therefore, we support the NOI Parties proposal to convene a Fish Passage Technical Working Group as proposed by the NOI Parties under Study AQ-7 Fish Passage to develop and assess a full range of viable and improved fish passage and water diversion alternatives at Cape Horn Dam.	
National Marine Fisheries Service-28	AQ 7	However, while Study AQ-7 Fish Passage proposes to convene a Fish Passage Technical Working Group it does not adequately define any timelines, targets, and/or deliverables for the group. Because the Project has changed significantly since the Federal Energy Regulatory Commission (FERC) approved the study plan, and study AQ-7 Fish Passage has not been conducted as provided for in the Commission approved Study Plan outlined in § 5.15 (d) (1), we strongly encourage FERC to update study AQ-7 Fish Passage to include: 1. Requiring the NOI Parties to include National Marine Fisheries Service (NMFS), California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), and Tribes in the Fish Passage Technical Working Group. 2. Requiring the NOI Parties to fully investigate all reasonable fish passage alternatives at Cape Horn Dam including unobstructed volitional passage. 3. Specific timelines and deliverables for the Fish Passage Technical Working Group.	Study AQ 7 currently includes establishing a Fish Passage Technical Working Group composed of stakeholders knowledgeable in issues related to fish passage, including participants representing National Marine Fisheries Service (NMFS), California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), and Tribes. Specific timelines and deliverables for the Fish Passage Technical Working Group are not yet developed. Also, please see response to Comment U.S. Fish and Wildlife Service-2.

Comment Number	Study (if applicable)	Comment	Response
National Marine Fisheries Service-29	AQ 7	We suggest that the expectations and deliverables of this technical working group should include reviews of existing fish passage and water diversion alternatives, as well as, contribute to the development of other fish passage and water diversion alternatives underdeveloped and/or not thoroughly evaluated. Each proposed design alternative must include the anticipated performance under extreme sediment and debris loads, which have historically required extensive and prolonged maintenance in order to resolve.	Study AQ 7 - Fish Passage currently includes assessing improved upstream and downstream fish passage alternatives (including conceptual designs, costs, and estimated efficacy) at Cape Horn Dam in collaboration with the fish passage technical working group. Designs will consider potential short-term and long-term effects of Scott Dam removal and associated changes to sediment supply on Cape Horn Dam fish ladder. Designs considerations will include consideration of working under extreme sediment and woody debris loads based on information from Study AQ 12 - Scott Dam Removal. Also, please see response to Comment U.S. Fish and Wildlife Service-2.
National Marine Fisheries Service-30	AQ 7	Pacific Gas and Electric Company (PG&E), California Department of Fish and Wildlife (CDFW), California Trout (CalTrout), Trout Unlimited, and National Marine Fisheries Service (NMFS) have demonstrated that DIDSON sonar technology can successfully assess migration timing and enumeration of Chinook salmon escapement, and to a lesser extent, winter-run steelhead trout in the mainstem Eel River (CDFW 2019, 2020). NMFS believes that further expansion of the DIDSON sonar network by capturing the major spawning tributaries of Chinook salmon, would assist in evaluating dam removal alternatives that may result in rapid sediment mobilization and/or adverse water quality releases. By expanding the DIDSON sonar network to the Van Duzen River, Middle Fork Eel River, North Fork Eel River, and potentially other areas, fisheries managers can establish the relative distribution of salmonids in the upper Eel River, which may provide insight to mitigating loss of refugia areas from dam removal activities. Furthermore, the continuation of the current mainstem DIDSON sonar location, while extending the monitoring season into the spring,	Dual Frequency Identification Sonar (DIDSON) was performed in the mainstem Eel River upstream of the South Fork for 2 years and provides valuable information on abundance and life history timing that will inform proposed studies. The NOI Parties understand that DIDSON monitoring will continue in some Eel River locations with support from California Department of Fish and Wildlife and others. The NOI Parties believe that existing abundance and life history timing information is sufficient to inform the proposed studies within the study area, and do not propose funding the existing or an expanded DIDSON network at this time. However, any additional Eel River DIDSON fish population monitoring information for the Eel River made available to the NOI Parties will be considered during study implementation.

Comment Number	Study (if applicable)	Comment	Response
		would capture the summer-run steelhead migration; an important component of assessing future Project operation alternatives. We request that the Federal Energy Regulatory Commission require the NOI Parties to work with the agencies and tribes for the continuation, and possible expansion, of the DIDSON sonar units, by providing funding for scientific aids, as California Department of Fish and Wildlife has DIDSON sonars available for use in the Eel River, but requires more field technician support.	
National Marine Fisheries Service-31	AQ 8	The NOI Parties propose to analyze the effects of a revised diversion schedule at either the existing structure at Van Arsdale, or an alternative structure. The existing screen at Van Arsdale is in need of major improvements as structural elements are worn and corroded and seals have gaps that could allow for entrainment of fish. A preliminary design was developed by Meade and Hunt that retained the same design concept but with some improvements. The conceptual design has some flaws but probably provides acceptable protection from entrainment. Algae growth on screen panels is an unavoidable problem with the existing design which uses an air burst cleaning system. A cleaning system that uses brushes, and a thorough cleaning more often than once annually would improve screen performance. If the diversion rate is going to be increased, a completely new intake with fish screen and bypass system is warranted to improve downstream migration (AQ-7 Fish Passage), reduce predation, and improve screen function.	Study AQ 7 - Fish Passage will assess existing fish screen performance at Van Arsdale Diversion under existing and proposed diversion patterns. The results of the Study AQ 7 fish screen evaluation (with design concepts from others including the preliminary design by Meade and Hunt) will inform Van Arsdale Diversion modification designs that could be included in the License Application.
National Marine Fisheries Service-32	AQ 9	National Marine Fisheries Service (NMFS) supports the goals and objectives of Study AQ-9 Fish Populations, as proposed by the NOI Parties and believes that the proposed additions are important for the development of a future Potter Valley Project. We would like to acknowledge that significant work was completed by Pacific Gas and Electric Company (PG&E) and their consultants regarding habitat conditions upstream of Scott Dam, including an evaluation of a	Study AQ 9 - Fish Populations currently includes convening a Predatory Fish Working Group to review and identify potentially viable and cost-effective suppression techniques for pikeminnow and other non-native predatory fish populations in the upper Eel River. In addition, Study AQ 9 includes the evaluation of predator hotspots, for which field work was

Comment Number	Study (if applicable)	Comment	Response
		natural passage barrier at Bloody Rock that segregates *O.mykiss* from downstream, invasive pikeminnow. Unfortunately, this information has not been released to the NOI Parties, or the many stakeholders, tribes, or federal and state agencies involved in the relicensing of the Project. We strongly encourage the Federal Energy Regulatory Commission to require PG&E to release this information which is currently unavailable but is critical to Project development. Additionally, PG&E has revised their approach to predatory fish (i.e., pikeminnow and bass) eradication within Van Arsdale Reservoir, with notable success. We strongly encourage the NOI Parties to engage with PG&E, the agencies and tribes regarding the suppression of invasive predatory fish at "hot spots" near and around Project facilities; especially, Cape Horn Dam (see Study AQ-7 Fish Passage).	performed in 2018. The NOI Parties are committed to working with Pacific Gas and Electric Company (PG&E), the agencies, and tribes with implementing Study AQ 9 and the other proposed studies.
National Marine Fisheries Service-33	AQ 9	There should be a detailed nonnative fish removal plan that would be implemented during the phased removal of Scott Dam to protect ESA species downstream of the Dam. This plan should consider the timing, species composition, methods, area and disposal. The timing should consider the time of year that will minimize impacts to salmonids that may be encountered with an emphasis on protection of native genetic diversity of salmonids that may be collected. The method needs to be described in detail and indicate the areas where fish removal will occur within Lake Pillsbury and associated tributaries such as the Eel River and the Rice Fork. The disposal plan for nonnative fish should be described and provide assurances that it will not result in adverse effects to the environment.	A nonnative fish removal plan (or "suppression and eradication plan") could be considered during development of protection, mitigation, and enhancement measures in the License Application.
National Marine Fisheries Service-34	AQ 9	A suppression and eradication plan should be included that is based on the summary of available information, eradication techniques, effectiveness, and cost. This plan should include the project scope identified previously in PG&E's January 15, 2018 revised study plan which includes the geographic area from the confluence of the Middle Fork Eel River upstream on the mainstem Eel River to all tributaries	Study AQ 9 - Fish Populations currently includes summarizing information on predatory fish suppression techniques, effectiveness, and cost relevant to non-native species in the upper Eel River watershed [see Pikeminnow (and other Predatory Fish) Suppression and Predation Hotspots]. In

Comment Number	Study (if applicable)	Comment	Response
		draining into Lake Pillsbury that have nonnative fishes. This request is consistent with the previously accepted study plan scope to describe the relative abundance of pikeminnow and other predatory fish species in tributaries upstream of Lake Pillsbury. A pikeminnow suppression plan should include evaluation of more aggressive physical eradication methodologies for all areas of the Eel River watershed where these nonnative fish persist.	addition, Study AQ 9 currently includes identifying the distribution and relative abundance of pikeminnow in tributaries upstream of Lake Pillsbury based on snorkeling at selected locations downstream of existing fish barriers [see Pikeminnow (and other Predatory Fish) Distribution and Relative Abundance Upstream of Lake Pillsbury]. Also, please see response to Comment National Marine Fisheries Service-33.
National Marine Fisheries Service-35	AQ 9	Additional restoration opportunities in the tributary streams draining into Lake Pillsbury should be investigated such as those identified in the National Marine Fisheries Service (NMFS) Coastal Multispecies Recovery Plan (NMFS 2016), which identifies fish passage improvements along the M6 USFS road to maximize access to high value salmonid habitat within this area. This example and others should be included in AQ-7 Fish Passage. NMFS (2016) also identifies actions in USFS tributaries located above Lake Pillsbury that call for actions to improve large wood frequency, improve riparian corridors, and upgrade failing road systems.	The NOI Parties may consider restoration opportunities in reaches upstream of Lake Pillsbury as well as elsewhere in the Eel River basin, however, any potential restoration actions beyond Project-affected reaches would most likely be considered outside of the Federal Energy Regulatory Commission process.
National Marine Fisheries Service-36	SE 1	We support the inclusion of socio-economic information in the license application. However, we recommend that the scope of the proposed study be expanded to include potential positive (beneficial) effects as well. The net socio-economic impact of the proposed action would likely be incomplete and possibly misleading without a fuller analysis to include positive benefits. Further, the Federal Energy Regulatory Commission cannot credibly administer its responsibilities under section 10(a) of the Federal Power Act, to ensure the best comprehensive development of the Eel River, without a full accounting of both positive and negative impacts. For example, even though there will be some negative effects from the proposed	Study SE 1 - Socioeconomics will consider potential beneficial and adverse socioeconomic effects for all resource issues identified in the study description. In regard to the specific recommendations identified in the comment, Study SE 1 currently includes the evaluation of direct effects to Pacific Ocean commercial and sport fisheries value (including ESA-listed salmonids), Eel and Russian river sport fisheries, and in-river recreation; as well as indirect effects to the region including, but not limited to, construction related employment.

Comment Number	Study (if applicable)	Comment	Response
		removal of 5 main-stem dams on the Klamath River, a series of detailed and comprehensive socio-economic analyses indicate a significant, net socio- economic benefit (Thorsteinson et al. 2011). Specifically, we recommend the study scope be expanded to include the following topics or resource areas: commercial fishing; in-river sport fishing; ocean sport fishing: ocean commercial fishing; ESA-listed species recovery; construction related employment; and in-river recreation.	
National Marine Fisheries Service-37	SE 1	Additionally, a full accounting of the project must include social benefits associated with "non- use value". Non-use values accrue to members of the public who value Eel River restoration regardless of whether they ever consume or catch Eel River fish, visit the Eel River, or otherwise use the natural resources of the Eel River. Non-use value is one component of the total value individuals place on the proposed environmental change. Evidence that non-use values exist for these types of projects can be found in donations to nonprofit organizations that work to protect the environment.	A non-use value assessment may be considered by the NOI Parties outside of the Federal Energy Regulatory Commission Process.
National Marine Fisheries Service-38	AQ 12	In addition [to the study elements currently included in Study AQ-12], National Marine Fisheries Service (NMFS) recommends the following study elements: – Evaluate completing Scott Dam removal and Lake Pillsbury drawdown during one wet- season. This alternative would limit the impacts of suspended sediment concentration and coarse sediment release to one year, rather than continue as chronic impacts. – Evaluate a range of hydrologic conditions following dam removal, including extreme wet and dry hydrology, in order to establish range of impacts from sediment mobilization. – Evaluate the potential for various Scott Dam removal alternatives to impact the operation of the fish ladder at Cape Horn Dam and propose ways to mitigate this impact.	In their comment letter, National Marine Fisheries Service submitted a request for a new study which included all elements of the proposed Study AQ 12 - Dam Removal and identified additional study elements. The first four recommended additional study elements are currently included in Study AQ 12 - Scott Dam Removal: 1) Study AQ 12 will assess the potential effects of releasing stored sediments under both one-time and phased removal alternatives. 2) The hydrologic period of record will be used to assess the range of potential sediment transport conditions following dam removal including extreme wet and dry hydrology. 3) Results from sediment transport modeling will inform the potential for released

Comment Number	Study (if applicable)	Comment	Response
		– If initial sediment transport modeling indicates substantial coarse sediment deposition, evaluate the potential for coarse sediment abrasion as the particles are transported downstream. – Develop a Lake Pillsbury Predatory Fish Eradication Plan for pikeminnow, bass and other predatory fishes to be implemented prior to dam removal. Lake Pillsbury has likely the highest density of these invasive fish in the Eel River and potentially the primary source of recruitment of pikeminnow and other nonnative species in the basin. – Work with National Marine Fisheries Service and California Department of Fish and Wildlife in developing an Anadromous Fish Reintroduction Monitoring Plan including California Coastal Chinook salmon, winter and summer run Northern California steelhead trout, and Pacific Lamprey.	sediment to impact Project infrastructure and fish passage conditions at Cape Horn Dam. In addition, Study AQ 7 - Fish Passage will use results of sediment transport modeling to inform designs to modify and improve fish passage conditions at Cape Horn Dam. 4) Study AQ 12 currently includes assessing sediment particle abrasion to inform sediment transport modeling. The last two recommended study elements could be considered during development of protection, mitigation, and enhancement measures in the License Application. Also, please see response to Comment National Marine Fisheries Service-33.
National Park Service-1	general	The ISR includes no references to the data that the National Park Service and BLM need to complete a Wild and Scenic River (WSR) Act Section 7 determination of the Eel River. Starting 100 yards downstream of Cape Horn Dam, the Eel River and its tributaries are designated as WSRs. The National Park Service and Bureau of Land Management (BLM) have WSR determination responsibilities under Section 7 of the WSR Act for the segments immediately downstream of the Project. Since the Project is located upstream of the Eel WSR, the standard to be used for the relicensing effort is whether the Project will invade or unreasonably diminish the fish, wildlife, recreation, and aesthetic resource values, with the baseline conditions being the date of designation (i.e., 1981). Any potential protection, mitigation, or enhancement measures proposed to be located within the designated portion of the Eel WSR would be evaluated under the direct and adverse effects on the values for which the river was established standard. A favorable WSR	The NOI Parties cannot respond specifically to a National Park Service (NPS) proposed study since the NPS has not proposed any specific studies. However, in general the NOI Parties are confident that existing information and information to be developed by the NOI Parties' proposed studies will provide adequate data for the NPS to complete a Wild and Scenic River (WSR) Act Section 7 determination, especially considering that the NOI Parties proposed Project does not include the construction or removal of any facilities in the WSR corridor and the NOI Parties intend to consult with agencies in the development of any protection, mitigation, and enhancement measures. The NOI Parties License Application will address potential effects of the NOI Parties' proposed Project on the outstandingly remarkable resource

Comment Number	Study (if applicable)	Comment	Response
		determination is necessary before the Federal Energy Regulatory Commission can issue a license.	values for which the Eel River WSR was designated at the time of the designation.
National Park Service-2	general	[comment was abbreviated] . . . National Park Service is concerned that the Applicants may not generate adequate information on the four WSR resource values in the draft license application (DLA) necessary for the (NPS) and BLM to initiate their WSR Section 7 determination. As mentioned above, a favorable determination is necessary before the Federal Energy Regulatory Commission can issue a license. Consequently, as in our previous comments, the NPS requests that the DLA address all four WSR resource values and related effects on the Eel WSR compared to the conditions present in 1981. This includes the resource impact analysis for Fish, Wildlife, Recreation, and Aesthetics.	Please see response to Comment National Park Service-1.
National Park Service-3	REC 3	The NPS reviewed REC 3-Whitewater Boating Study Technical Study Summary and associated documents found in Attachment 1 Volume V of the ISR. The NPS has also reviewed the summary of REC 3 in Section 2.19 of the ISR. From our review, the NPS acknowledges that certain components of the study are complete, including the results of interviews and a focus group session and hydrology data from Study AQ 1, and that focus group participants collectively agreed that a whitewater boating flow study was not necessary. The focus group also indicated that there is a need for real time flow data vs daily/monthly. It is our understanding that this will be analyzed/evaluated as part of the new license.	The Hydrology Assessment will be completed as described in Study REC 3 - Whitewater Boating. Potential effects of the proposed Project on whitewater boating will be evaluated in the Draft License Application. The National Park Service is correct that the need for improved real-time flow information could be considered during development of protection, mitigation, and enhancement measures in the License Application.
National Park Service-4	REC 3	As identified in the ISR, there are certain aspects of REC 3-Whitewater Boating Study that have not been completed. This includes a site visit identified during the focus group discussion as necessary to assess access conditions at the put-in at Benmore Creek, take-out at Bucknell Creek, and put-in below Cape Horn Dam. An additional run was identified as needing to be studied, the East Branch Run, and a site visit to that location was also determined necessary. The National	During the 2018 Whitewater Boating Focus Group Meeting, participants determined that a site visit was necessary to assess access conditions in the Eel River at the following locations: put-in at Benmore Creek; take-out at Bucknell Creek; and put-in below Cape Horn Dam. The site visit for these locations will be completed. Additionally, the study area was expanded

Comment Number	Study (if applicable)	Comment	Response
		Park Service appreciates the Applicants' commitment to conducting these site visits and requests to be informed about their scheduling.	to include the East Branch of the Russian River; the run identified on the East Branch Russian River will be evaluated as part of Study REC 3 - Whitewater Boating and a site visit will be conducted. The NOI Parties are happy to inform the National Park Service about scheduling for these site visits.
National Park Service-5	REC 3	The NPS is satisfied with the initial results of REC 3-Whitewater Boating Study and commends the Applicants for their commitment to completing the study, including conducting the site visits identified as necessary by the focus group. The study as conducted thus far follows the methods outlined in the study request that the NPS submitted in response to the Pre-Application Document on August 4, 2017. However, that study request was submitted prior to Scott Dam being considered for removal. The objective of NPS's study request was to "better understand the Project Area's hydrology, whitewater boating opportunities, Project operations effects on these opportunities, and how recreationists access boatable reaches in the Project Area." The purpose of the study was to gather information that could be "used to evaluate the impacts of the Project on existing and potential recreational whitewater boating use." The participants in the interviews and focus group did not assess the whitewater boating opportunities with the removal of Scott Dam in mind, which would potentially affect the runs studied, including changes stemming from hydrology and access. In addition, the removal of Scott Dam would affect runs not studied in REC 3, including runs upstream of Lake Pillsbury (Upper Eel, Rice Fork), as well as new runs that would emerge with the draining of the reservoir. The NPS does not believe that a new whitewater boating study is necessary to "evaluate the impacts of the Project on existing and potential recreational whitewater boating use" that were not evaluated in the existing REC 3 study. Instead, the NPS requests that	The NOI Parties agree to include additional focus group discussion regarding whitewater runs that could be directly impacted by the removal of Scott Dam. This discussion would be planned during the site visit intended for the East Branch Russian River and at locations previously identified during the focus group discussion (i.e., put-in at Benmore Creek; take-out at Bucknell Creek; and put-in below Cape Horn Dam).

Comment Number	Study (if applicable)	Comment	Response
		the Applicants lead an additional focus group discussion with stakeholders involved in the previous focus group, or others who are similarly familiar with whitewater boating in the affected sections of the Eel and Russian Rivers. The discussion would compare the results outlined in REC-3 study report to potential changes in boating opportunities due to the removal of Scott Dam. This would include identifying additional runs that would be directly impacted by the Project, including those upstream and beneath Lake Pillsbury. To be efficient, the additional focus group discussion could be combined with the site visits that the Applicants plans to lead.	
U.S. Fish and Wildlife Service-1	general	U.S. Fish and Wildlife Service (USFWS) has been a member of the Potter Valley Ad Hoc Committee since its inception and supports the principles of the committee's "two-basin solution". This "two-basin solution" was intended to include co-equal goals of 1) improving fish passage and aquatic habitat conditions on the Eel River, supporting recovery of naturally reproducing, self-sustaining and harvestable native anadromous fish populations, including upstream and downstream migratory access at current project dam locations; and 2) minimizing or avoiding adverse impacts to water supply reliability, fisheries, water quality, and recreation in the Russian River and Eel River basins. In the development of this letter, USFWS reviewed letters submitted to the Federal Energy Regulatory Commission on this topic by California Department of Fish and Wildlife, Friends of the Eel River, NOAA Fisheries and the U. S. Forest Service. USFWS comments are directed at evaluating project alternatives that maximize benefits to the principles of the "two-basin solution."	Thank you for your comment. The NOI Parties look forward to working with U.S. Fish and Wildlife Service and other stakeholders toward the success of a Two-Basin Solution based on the shared objectives.
U.S. Fish and Wildlife Service-2	AQ 7	U.S. Fish and Wildlife Service (USFWS) recognizes and appreciates the extensive effort put forward by the NOI Parties in the development of the Initial Study Report, but we are concerned that the plan currently fails to address all reasonable alternatives related to providing fish passage at Cape Horn Dam. This point was raised previously in	The NOI Parties agree that the Federal Energy Regulatory Commission (FERC) should consider all relevant alternatives to the proposed action in the new License Application. We expect FERC to consider alternatives that relate to fish passage at Cape Horn

Comment Number	Study (if applicable)	Comment	Response
		comments submitted by USFWS to the Federal Energy Regulatory Commission dated June 29, 2020, which were not addressed in the Initial Study Report (including in the description provided in AQ-7 Fish Passage Study Plan). More specifically, we request the removal of Cape Horn Dam be included as a reasonable alternative to provide migratory fish passage and be analyzed by the NOI Parties. This request was re-iterated in a verbal comment by USFWS (Representative Damon H. Goodman) to the NOI Parties during the September 29, 2020 Initial Study Report Meeting. The response from the NOI parties during the meeting differed among NOI representatives and was subsequently not included in the October 14, 2020 meeting summary notes. To clarify, the removal of Cape Horn Dam alternative differs from a "no-project" alternative in that it would maintain a diversion to the Russian River in alignment with the principles of the "two-basin solution." Below we re-state our previous comments on this topic and provide justification for including this alternative in the AQ-7 Fish Passage Study Plan.	Dam. The NOI Parties, as the proxy for the future applicant, are not required to study all alternatives that FERC will analyze in the National Environmental Policy Act (NEPA) document. The NOI Parties agree that current fish passage infrastructure at this dam is inadequate and should be improved during the term of any new license. We request that National Marine Fisheries Service (NMFS), U.S. Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW) propose performance standards or criteria for effectiveness, along with the record basis for such criteria. The NOI Parties have already developed, and the record includes, significant information (including engineering and cost analysis) related to the feasibility of alternatives for fish passage at Cape Horn Dam. This information covers the alternative of removal of Cape Horn Dam, among others. Such information is found in the Potter Valley Project Capital Modifications Feasibility Study Report (July 2018), available at: http://pottervalleyproject.org/wp-content/uploads/2018/08/MJ-Potter-Valley-Project-2018-08.pdf The NOI Parties continue due diligence related to Cape Horn Dam as we proceed towards development of a new License Application. This due diligence (which supplements the studies in the FERC-approved study plan) is specifically designed to advance the objectives

Comment Number	Study (if applicable)	Comment	Response
			of a Two-Basin Solution under the Amended Planning Agreement. To that end: 1. The Parties will develop quantitative criteria for water supply reliability. We will apply performance criteria for fish passage. These criteria will form the basis for identifying and screening potential options for modification of Cape Horn Dam. As has been our practice to date, NOI Parties will continue to consult with stakeholders (including USFWS, NMFS, and CDFW, among others) regarding this due diligence. 2. NOI Parties intend to investigate all options that we believe meet the Parties' criteria and otherwise are consistent with a Two-Basin Solution. The due diligence will inform the NOI Parties' decision on what to propose in the new License Application. That application will include exhibits with the applicable information necessary to support the proposed action. 3. At this time, the NOI Parties are not prepared to endorse or discount any specific options for modification of Cape Horn Dam.
U.S. Fish and Wildlife Service-3	AQ 7	Under the action proposed by NOI Parties, the fishery benefits of removing Scott Dam would be almost completely contingent upon the ability of fish to access this reach of river. In the proposed project configuration, fish would need to pass over the roughly 60-ft tall crest at Cape Horn Dam to access habitats made available by the removal of Scott Dam. U.S. Fish and Wildlife Service (USFWS) requests the NOI Parties execute a study to place the risks and uncertainties of their proposed project configuration in the context of alternative	Please see response to Comment U.S. Fish and Wildlife Service-2.

Comment Number	Study (if applicable)	Comment	Response
		approaches to maintaining the inter-basin water diversion. In this study, we request the NOI Parties consider the risks and uncertainties associated with meeting the "two-basin solution" and specifically, the project's ability to support anadromous fish populations while maintaining a reliable water supply to the Potter Valley Irrigation Project. Please consider the following scenarios in AQ-7: 1) maintain Cape Horn Dam and modify the technical fishway as described in the NOI Parties' Feasibility Study and, 2) remove Cape Horn Dam to provide a natural channel for both upstream and downstream fish migration and restructure the diversion intake to facilitate diversions without Cape Horn Dam. This study should incorporate expected changes in the coarse sediment transport regime in the short and long-time frames as the Eel River channel finds a new dynamic equilibrium after removal of Scott Dam. This analysis will likely require consideration of a phased implementation approach when analyzing the scenarios.	
U.S. Fish and Wildlife Service-4	AQ 7	As mentioned by other resource management agencies commenting on the Initial Study Report, U.S. Fish and Wildlife Service (USFWS) shares serious concerns about the functionality of the existing fishway at Cape Horn Dam. This facility is California's largest and tallest man-made fishway and was originally constructed in the 1920's. Despite numerous modifications and reconfigurations over the past 100 years, substantial upstream and downstream fish passage issues persist due, in part, to site-specific challenges. USFWS requests the NOI Parties conduct a comprehensive analysis and review of passage issues at Cape Horn Dam fishway and screening facility to develop an understanding of existing issues to be addressed when designing a potential fishway modification or an alternative that would include removal of the Cape Horn Dam facility. In addition, USFWS requests this study fully evaluate if the fishway modifications proposed by the NOI Parties would be susceptible to the same ongoing issues and therefore be insufficient to support viable native fish populations.	Study AQ 7 - Fish Passage currently includes assessing upstream and downstream fish passage improvements at Cape Horn Dam. Fish passage design considerations will specifically address downstream passage of juveniles and steelhead kelts at Cape Horn Dam, as well as potential migration delays at the fishway/ladder. In addition, fish passage improvement designs will consider potential short-term and long-term effects of Scott Dam removal and associated changes to sediment supply on Cape Horn Dam fishway/ladder, and consideration of working under extreme sediment and woody debris loads. Also, please see response to Comment U.S. Fish and Wildlife Service-2.

Comment Number	Study (if applicable)	Comment	Response
U.S. Fish and Wildlife Service-5	AQ 7	The complexity of providing functional fish passage at this location is challenged not only to the size of Cape Horn Dam, but also the dam site's active geologic setting and sediment transport regime that is particularly challenging for operating a large technical fishway. From T.E. Lisle (1990): "the Eel River draining the Coast Range of northwestern California has the highest recorded average suspended sediment yield per drainage area of any river of its size or larger unaffected by volcanic eruptions or active glaciers in the conterminous United States."	Please see response to Comment U.S. Fish and Wildlife Service-2.
U.S. Fish and Wildlife Service-6	AQ 7	This issue is well exemplified by numerous and prolonged unplanned, unforeseen and unpermitted closures to the fishway at Cape Horn Dam during critical fish migration periods due to sedimentation caused by periodic high-water events. In 2019 for example, the fishway was closed for over 60% of the time or 36 days between mid-January and mid-March, which falls completely within the migration period of ESA-listed steelhead Rainbow Trout (PG&E 2020). The 2019 closures were due to high flow events that caused the fishway to be filled with sediments and passage to be blocked. In addition, it is highly probable that the sedimentation issue at the fishway will intensify in response to implementing the proposed action as the coarse sediment that is currently captured by Scott Dam will be mobilized following its removal and will travel downstream to Cape Horn Dam.	Please see response to comments U.S. Fish and Wildlife Service-2 and U.S. Fish and Wildlife Service-4.
U.S. Fish and Wildlife Service-7	AQ 7	Concerns about upstream and downstream fish passage at the Cape Horn fishway have also been brought into question during time periods when the fishway is considered "open". These passage issues have been identified in ongoing mark-recapture fish migration studies conducted at the fishway, which have documented non-linear patterns in migration rates of both salmonids and lampreys. These passage issues have been expressed as either migration delays or even a total lack of passage, even when the fishway is considered	Please see response to Comment U.S. Fish and Wildlife Service-4.

Comment Number	Study (if applicable)	Comment	Response
		"open" and therefore considered passable (U.S. Fish and Wildlife Service, California Department of Fish and Wildlife and National Marine Fisheries Service unpublished data). These studies have also documented steelhead Rainbow Trout kelts attempting to swim downstream through the ladder, only to later retreat back upstream, thereby delaying their intended downstream migration. In addition, the viability of downstream passage of juvenile Chinook Salmon, steelhead Rainbow Trout and Pacific Lamprey has not been studied specifically but was requested in previous study planning processes due to concerns over the probable migratory path over the face of Cape Horn Dam spilling directly onto rocks.	
U.S. Fish and Wildlife Service-8	AQ 7	Predation is another primary threat observed at the Cape Horn Dam fishway and is common where fish pass through man-made structures. The Eel River channel in this reach is approximately 100 ft wide. However, fish are restricted to a 4 ft wide channel within the fishway while fish are challenged with passing over the dam using the fishway. Predators have been observed taking advantage of this opportunity to prey upon upstream and downstream migrating fishes. Predators observed feeding at the fishway include, but are not limited to, Sacramento Pikeminnow, Smallmouth Bass, Otter, Bald Eagle, Raccoon and Black Bear.	The NOI Parties appreciate concerns regarding predation associated with project infrastructure at Cape Horn Dam and the fishway/ladder and will consider design improvements to reduce the risk of predation when developing potential modifications to Cape Horn Dam and the fishway/ladder. Also, please see response to Comment U.S. Fish and Wildlife Service-2.
U.S. Forest Service-1	AQ 12	Under POTENTIAL RESOURCE ISSUE(S) the Forest Service believes it would be desirable to have data from the PVP Sediment Stabilization Measures as mentioned in AQ 12 in order to help us better understand what information is available. The Forest Service believes it would be helpful to see goal(s) statement(s) on why there is a need for the hydrodynamic, sediment transport, sediment supply, channel morphology modeling as well as the sediment and vegetation management assessments. This would assist in developing a future adaptive management plan for the Lake bottom. In addition, the Forest Service would like clarification regarding the purpose of the	Supporting study information will be made available to stakeholders during study implementation. The need for the various proposed analyses is provided in the Information Gaps section of Study AQ 12 - Scott Dam Removal. The goals of sediment transport modeling and sediment supply analysis are to gather information needed to estimate the potential downstream effects of releasing stored sediments following Scott Dam removal and compare estimates of increased sediment supply with background

Comment Number	Study (if applicable)	Comment	Response
		Sediment and Vegetation Management Assessments. Will information from these Assessments be used to generate an adaptive management plan?	sediment supply estimates. Specific goals for sediment and vegetation management study elements in Study AQ 12 are to refine potential approaches and inform estimated cost. Information from the sediment and vegetation management study elements could also be used to inform management plans that could inform or be included in the decommissioning plan. Adaptive management could be considered in those management plans.
U.S. Forest Service-2	REC 1	Under Visitor Surveys (page REC 1-7) and the bullet statement regarding recreation visitor surveys, the Forest Service recommends that we expand this study to gather information about potential new recreational users and recreation season when the dam is removed. This information will help us better understand what protection and mitigations measures might be required post dam removal.	Study REC 1 - Recreation Facility Assessment currently includes Focused Recreation Visitor surveys. The survey instrument for this study element will be developed in consultation with U.S. Forest Service during study implementation and is generally intended to develop information about visitor demographics, needs, preferences, and perceptions regarding the Project recreation facilities. During consultation, the NOI Parties agree to discuss possible questions for inclusion in Focused Visitor Surveys related to future recreation opportunities without Scott Dam and Lake Pillsbury.
U.S. Forest Service-3	LAND 1	U.S. Forest Service (USFS) suggests revising the 4th bullet in Study LAND 1 Proposed Studies/Analyses to Address Identified Significant Information Gaps. The study originally stated, "Possible locations of roads and trails when the dam is removed to provide recreational opportunities." USFS suggests revising the study to "Possible locations of roads and trails when the dam is removed to provide access to new recreational opportunities identified in the visitor focused studies."	Study LAND 1 - Roads and Trail Assessment is designed to assess the condition of existing Project roads and Project trails and identify user-created trails within the FERC Project Boundary. Potential effects of the proposed Project on existing roads and trails will be evaluated in the License Application. Potential locations of new roads and trails after dam removal could be considered as a protection, mitigation, and enhancement measure and could be informed by

Comment Number	Study (if applicable)	Comment	Response
			information collected by Focused Visitor Surveys in Study REC 1 - Recreation Facilities Assessment. Also, please see response to Comment U.S. Forest Service-2.
U.S. Forest Service-4	LAND 1	U.S. Forest Service suggests adding the following bullet to Study LAND 1 Proposed Studies/Analyses to Address Identified Significant Information Gaps. "Determine which roads and trails are no longer necessary to support the current reservoir-based recreation and develop decommissioning plan for those roads and trails."	Study LAND 1 - Roads and Trail Assessment is designed to assess the condition of existing Project roads and Project trails and identify user-created trails within the FERC Project Boundary. Potential effects of the proposed Project on existing roads and trails, including the potential loss of roads and trails that will no longer be necessary after the removal of Scott Dam, will be evaluated in the License Application. The decommissioning plan for Scott Dam will be included with the Preliminary Licensing Proposal/Draft License Application and will describe potential roads and trails that may no longer be necessary. A management plan for decommissioning existing roads and trails that may no longer necessary could be considered during development of protection, mitigation, and enhancement measures.
U.S. Forest Service-5	LAND 1	U.S. Forest Service (USFS) suggests revising the 1st bullet under Relationship to Other Studies: The study originally stated "Information regarding Recreation Facility Access Roads will be used in coordination with Study REC 1 - Recreation Facility Assessment to characterize overall Project recreation facility condition and functionality." USFS suggests revising the study to "Information regarding Recreation Facility Access Roads will be used in coordination with Study REC 1 - Recreation Facility Assessment to characterize overall Project	Study LAND 1 - Roads and Trail Assessment is designed to assess the condition of existing Recreation Facilities Access Roads. New recreation facilities and associated access roads could be considered as a protection, mitigation, and enhancement measure and could be informed by information collected by Focused Visitor Surveys in Study REC 1 - Recreation Facilities Assessment.

Comment Number	Study (if applicable)	Comment	Response
		recreation facility condition and functionality, as well as possible access to new recreation facilities when the dam is removed."	Also, please see response to Comment U.S. Forest Service-2.
U.S. Forest Service-6	LAND 2	U.S. Forest Service (USFS) suggests revising text under Project Nexus. The study originally stated, "The presence of Project facilities could affect visual resources." USFS suggests revising the study to "The proposed removal of the dam will change the visual quality of the project area."	The NOI Parties do not agree that the suggested change to the nexus statement is warranted. Study LAND 2 - Visual Resources Assessment is designed to assess existing visual condition of Project facilities. The decommissioning plan for the removal of Scott Dam will be included in the License Application and will describe the rehabilitation of the lands following dam removal in consideration of Mendocino National Forest visual quality standards. Potential effects of the proposed Project on visual condition will be evaluated in the License Application and informed by data collected under Study LAND 2 as well as the decommissioning plan.
U.S. Forest Service-7	LAND 2	U.S. Forest Service (USFS) suggests adding the following bullet to the Proposed Studies/Analyses to Address Identified Significant Information Gaps section. "Assess the potential visual quality impacts of the project area with the dam removed."	Please see response to Comment U.S. Forest Service-6.
U.S. Forest Service-8	LAND 2	U.S. Forest Service (USFS) suggests revising the Study Methods and Analysis - Inventory and Assess Existing Visual Conditions section as follows: The study originally stated "Utilize the recreation visitor surveys to be conducted as part of Study REC 1 to develop information about visitor satisfaction, preferences, and concern levels related to landscape and scenic character." USFS suggests revising the study to "Utilize the recreation visitor surveys to be conducted as part of Study REC 1 to develop	Information obtained during Focused Visitor Surveys under Study REC 1 - Facilities Assessment will inform visitor impressions of existing landscape and scenic character. The decommissioning plan will describe the rehabilitation of the lands following dam removal in consideration of Mendocino National Forest visual quality standards. Potential effects of the proposed Project on visual condition will be evaluated in the License Application once the decommissioning plan is developed and will be informed by data collected

Comment Number	Study (if applicable)	Comment	Response
		information about visitor satisfaction, preferences, and concern levels related to landscape and scenic character with the impacts of the removal of the dam."	under Study LAND 2 and Study REC 1 to describe the existing visual condition.
U.S. Forest Service-9	LAND 3	U.S. Forest Service (USFS) suggests revising the 3rd bullet under the Relevant Information section. The study originally stated "Information about the major fires that have occurred in the Project vicinity, including acreages and ignition sources, is available from the Fire and Resource Assessment Program (FRAP 2018), which is managed by CalFire." USFS suggests revising the study to "Information about the major fires that have occurred in the Project vicinity, including acreages and ignition sources, is available from the Fire and Resource Assessment Program (FRAP 2018), which is managed by CalFire. FRAP does not include all ignition points. Acquire data that includes all ignition points (Forest Service can provide this data). Without a lake, water sources may be further away which could make immediate suppression of ignitions less likely and more likely to increase the number of fires that become larger. This information is necessary in order for this study to be accurate."	Study LAND 3 - Fuels Assessment will be expanded to consider information from U.S. Forest Service, Cal FIRE, and the Fire Resource Assessment Program (FRAP 2018) about the major fires that have occurred in the Project vicinity, including acreage and ignition source.
U.S. Forest Service-10	LAND 3	U.S. Forest Service suggests adding the following bullet to the Proposed Studies/Analyses to Address Identified Significant Information Gaps section. "Include data regarding change in fire suppression response time-frames, strategies and capabilities for fire suppression resources particularly fire engines and aircraft in regard to use of water post dam removal. Post dam removal (i.e., no lake) fire suppression tactics include, but not limited to, drafting from fire engines and water tenders, helicopter bucket use and super scoopers. Study needs to include the lack of water availability and cost of using water sources	Study LAND 3 - Hazardous Fuels Reduction Assessment will be expanded to include fire suppression response timeframes, strategies, and capabilities for fire suppression resources, particularly fire engines and aircraft in regard to use of water post dam removal. Study SE 1 - Socioeconomics will assess the potential socioeconomic effects of the proposed Project.

Comment Number	Study (if applicable)	Comment	Response
		located on private property. Not all landowners will give permission to use their water source."	
U.S. Forest Service-11	LAND 3	U.S. Forest Service suggests adding the following text to the Extent of the Study Area section. "The Lake is used for fire suppression activities outside the FERC boundary. Fuel reduction mitigations and alternative water source research/data would require going outside this boundary."	The NOI Parties agree in-part with the suggested modification and will expand Study LAND 3 - Fuels Assessment to include alternative water sources beyond the FERC Project boundary to a reasonable distance for firefighting in the Project vicinity. Fuel reduction and other potential protection, enhancement, and mitigation measures could be discussed as part of the License Application.
U.S. Forest Service-12	LAND 3	U.S. Forest Service (USFS) suggests revising the 1st bullet under the Study Methods and Analysis - Water Availability section as follows: The study originally stated "Identify alternative water drafting sites for fires that might be used in the Study Area in the absence of Lake Pillsbury. Specify those that can be used during years of extreme drought." USFS suggests revising the study to "Identify alternative water drafting sites for fires and other uses, that might be used in the Study Area in the absence of Lake Pillsbury. Specify those that can be used during years of extreme drought."	Study LAND 3 - Hazardous Fuels Reduction Assessment is designed to collect information about current and alternative water drafting sites for fire suppression. The comment does not clarify what 'other uses' might be and whether these would need to be considered for purposes beyond firefighting. Therefore, the NOI Parties do not propose to expand the assessment to include 'other uses'.
U.S. Forest Service-13	LAND 3	U.S. Forest Service suggests adding the following bullets to the Study Methods and Analysis - Water Availability section: "Analyze the change in fire suppression capabilities as a result of having to utilize other water sources." and "Identify mitigation activities needed as a result of change in fire suppression capabilities. (e.g. fuels reduction work needed in the surrounding areas due to extended time needed to get water to fires that normally would utilize the lake as the water source)."	Study LAND 3 - Hazardous Fuels Reduction Assessment study is designed to characterize existing fuel loads and assess the ability to prevent, control, and suppress fires. Potential effects of the proposed Project on fire suppression capabilities will be evaluated in the License Application. The need for potential mitigation activities could be considered during development of protection, mitigation, and enhancement measures in the License Application.

Comment Number	Study (if applicable)	Comment	Response
U.S. Forest Service-14	REC 1	U.S. Forest Service suggests addition the following bullets to the Potential Information Gaps section: "Economic viability of the current recreation facilities when the dam is removed." and "Effects of increased motorized use (OHV) on the lake bottom to soil, vegetation, water quality, archeology, and wildlife when the dam is removed."	Study REC 1 - Recreation Facilities Assessment is designed to collect information on the condition of existing recreation facilities. Potential effects of off-highway vehicle use on the lake bottom after Scott Dam is removed will be evaluated in the License Application.
U.S. Forest Service-15	REC 1	U.S. Forest Service (USFS) suggests revising bullet 2 under the Potential Information Gaps section as follows: The study originally stated "Information about visitor needs, preferences, and perceptions regarding Project recreation facilities and opportunities; Information regarding recreation use and demand;" USFS suggests revising it to "Information about visitor needs, preferences, and perceptions regarding Project recreation facilities and opportunities; Information regarding recreation use and demand; and desired recreation opportunities when the dam is removed."	Study REC 1 - Recreation Facilities Assessment includes consultation with the U.S. Forest Service (USFS) to develop the survey instrument described for the Focused Visitor Surveys study element. The NOI Parties agree to discuss with the USFS possible survey questions related to future recreation opportunities without Scott Dam and Lake Pillsbury. Also, please see response to Comment U.S. Forest Service-2.
U.S. Forest Service-16	REC 1	U.S. Forest Service (USFS) suggests revising bullet 3 under the Potential Information Gaps section as follows: The study originally stated, "Information about existing and future recreation needs compared to existing recreation facility features and capacities" USFS suggests revising it to "Information about future recreation needs compared to existing recreation facility features and capacities"	The NOI Parties do not agree with the proposed revision to the study. The primary goal of Study REC 1 - Recreation Facility Assessment is to assess current recreation use and demand relative to the capacity and features of existing facilities. Although recreation use patterns and needs may change under the proposed Project, understanding existing use is necessary for the Federal Energy Regulatory Commission's Environmental Impact Statement and will be evaluated in the License Application.

Comment Number	Study (if applicable)	Comment	Response
U.S. Forest Service-17	REC 1	U.S. Forest Service (USFS) suggests revising bullet 2 under the Proposed Studies / Analyses to Address Identified Significant Information Gaps section as follows: The study originally stated "Conduct focused visitor surveys at the Project recreation facilities to identify visitor needs, preferences, and perceptions regarding Project recreation facilities and opportunities" USFS suggests revising it to "Conduct focused visitor surveys at the Project recreation facilities to identify visitor needs, preferences, and perceptions regarding Project recreation facilities and opportunities when the dam is removed, and reservoir-based recreation is no longer available."	Study REC 1 - Recreation Facilities Assessment currently includes consultation with the U.S. Forest Service to develop the survey instrument described for the Focused Visitor Surveys study element. The NOI Parties agree to discuss with the USFS possible survey questions related to future recreation opportunities without Scott Dam and Lake Pillsbury. Also, please see response to Comment U.S. Forest Service-2.
U.S. Forest Service-18	REC 1	U.S. Forest Service suggests adding the following bullet to the Proposed Studies / Analyses to Address Identified Significant Information Gaps section: "Determine which existing recreation facilities are viable when the dam is removed and what new recreation facilities are needed. Identify possible locations of new recreation facilities to support the desired recreation opportunities identified in the visitor focused surveys."	Study REC 1 - Recreation Facilities Assessment is designed to assess existing and future recreation use and demand in the Project Area which will inform the effects assessment included in the License Application. Potential changes to existing recreation facilities and potential new recreation facilities could be considered as a protection, mitigation, and enhancement measure in the License Application.
U.S. Forest Service-19	REC 1	U.S. Forest Service suggests adding the following bullet to the Proposed Studies / Analyses to Address Identified Significant Information Gaps section: "Identify impacts to the project area with new recreation user groups when the dam is removed."	Study REC 1 - Recreation Facilities Assessment is designed to assess existing and future recreation use and demand in the Project Area which establishes a baseline of comparison. Potential impacts of new recreation users when the dam is removed will be assessed in the License Application and informed by the decommissioning plan.
U.S. Forest Service-20	REC 1	U.S. Forest Service suggests adding the following bullet to the Proposed Studies / Analyses to Address Identified Significant Information Gaps section: "Conduct an analysis to determine	Please see response to Comment U.S. Forest Service-14.

Comment Number	Study (if applicable)	Comment	Response
		potential effects of allowing OHV use on the lake bottom when the dam is removed."	
U.S. Forest Service-21	REC 1	U.S. Forest Service suggests adding the following bullet to the Study Methods and Analysis - Recreation Facility Inventory and Assessment section: "Develop a GIS map showing potential locations of new recreation sites when the dam is removed to support the potential change in recreation use of the project area."	Study REC 1 - Recreation Facilities Assessment is designed to assess existing and future recreation use and demand in the Project Area which will inform the effects assessment included in the License Application. Potential changes to existing recreation facilities and potential new recreation facilities could be considered as a protection, mitigation, and enhancement measure.
U.S. Forest Service-22	REC 1	U.S. Forest Service suggests revising the 1st sub-bullet under the Study Methods and Analysis - Focuses Visitor Surveys section: The study originally stated, "Identify activities visitors participate in when visiting a Project recreation facility." USFS suggests revising it to "Identify activities visitors participate in when visiting a Project recreation facility, and identify activities visitors would want to participate in when the dam is removed"	Please see response to Comment U.S. Forest Service-2.
U.S. Forest Service-23	REC 1	U.S. Forest Service (USFS) suggests revising the 3rd sub-bullet under the Study Methods and Analysis - Focuses Visitor Surveys section: The study originally stated, "Identify why people visit Lake Pillsbury, including reasons that may involve landscape character and scenic integrity". USFS suggests revising it to "Identify why people visit Lake Pillsbury, including reasons that may involve landscape character and scenic integrity; identify if the existing user group will continue to recreate at the site when the dam is removed;"	Please see response to Comment U.S. Forest Service-2.

Comment Number	Study (if applicable)	Comment	Response
U.S. Forest Service-24	REC 1	U.S. Forest Service suggests adding the following sub-bullet under the Study Methods and Analysis - Focuses Visitor Surveys section: "Identify other recreation user groups that may want to recreate in the project area after the dam is removed;"	Study REC 1 - Recreation Facilities Assessment currently includes an assessment of current user groups; new recreation user groups who do not presently recreate in the Project Area will not be evaluated.
U.S. Forest Service-25	REC 1	U.S. Forest Service suggests adding the following sub-bullet under the Study Methods and Analysis - Focuses Visitor Surveys section: "Identify the desired level of access that the public wants in the project area;"	Please see response to Comment U.S. Forest Service-2.
U.S. Forest Service-26	REC 1	U.S. Forest Service (USFS) suggests revising the 4th sub-bullet under the Study Methods and Analysis - Focuses Visitor Surveys section: The study originally stated, "Identify motorized and non-motorized recreation opportunities" USFS suggests revising it to "Identify the level of recreation development the public desires in the project area following the removal of the dam;"	Please see response to Comment U.S. Forest Service-2.
U.S. Forest Service-27	REC 1	U.S. Forest Service suggests adding the following sub-bullet under the Study Methods and Analysis - Focuses Visitor Surveys section: "Identify motorized and non-motorized recreation opportunities when the dam is removed"	Study REC 1 - Recreation Facilities Assessment is designed to assess existing and future recreation use and demand in the Project Area which will inform the effects assessment included in the License Application. Potential changes to motorized and non-motorized recreation opportunities could be considered as a protection, mitigation, and enhancement measure in the License Application.
U.S. Forest Service-28	REC 1	U.S. Forest Service (USFS) suggests revising the following sub-bullet under the Study Methods and Analysis - Focuses Visitor Surveys section: The study states "Collect the following information, which will be used for Study REC 2 - Reservoir Recreation Opportunities: …	Please see response to Comment U.S. Forest Service-24.

Comment Number	Study (if applicable)	Comment	Response
		Potential user conflicts (i.e., overall crowding or conflicts between competing recreation uses); and. . . " USFS suggests revising it to "Collect the following information, which will be used for Study REC 2 - Reservoir Recreation Opportunities: … Potential user conflicts (i.e., overall crowding or conflicts between competing recreation uses); and potential user conflicts of new user groups when dam is removed. . . "	
U.S. Forest Service-29	REC 2	U.S. Forest Service (USFS) suggests revising the 2nd bullet under Project Nexus: The study states, "Project operations result in water surface elevation (WSE) changes at Lake Pillsbury that may affect reservoir recreation opportunities and use." USFS suggest revising it to "Proposed dam removal will eliminate reservoir recreation opportunities and use."	The NOI Parties agree with proposed characterization of nexus.
U.S. Forest Service-30	REC 2	U.S. Forest Service suggests deleting the 3rd bullet under Project Nexus which states, " Proposed changes in Project facilities and operations would affect reservoir recreation opportunities and use at Lake Pillsbury."	The NOI Parties agree with proposed characterization of nexus.
U.S. Forest Service-31	REC 2	U.S. Forest Service suggest adding the following bullets to the Proposed Studies / Analyses to Address Identified Significant Information Gaps section: "Determine what recreation opportunities are desired by the public in the project boundary when the dam is removed" "Determine what recreation opportunities are possible in the project boundary when the dam is removed and there is no reservoir-based recreation"	The NOI Parties agree to discuss with the U.S. Forest Service possible survey questions related to future recreation opportunities without Scott Dam and Lake Pillsbury. Also, please see response to Comment U.S. Forest Service-2.

Comment Number	Study (if applicable)	Comment	Response
U.S. Forest Service-32	REC 2	U.S. Forest Service suggests replacing "WSE" with "dam removal" at several locations throughout Study REC 2.	Study REC 2 - Reservoir Recreation Opportunities is intended to evaluate existing reservoir recreation conditions, a global replace of “WSE” with “dam removal” is not appropriate in all instances.
U.S. Forest Service-33	REC 2	U.S. Forest Service suggests revising the 1st bullet in the Study Methods and Analysis - Identify Reservoir Recreation Opportunities and Operational Constraints section as follows: The study states, "Identify and characterize recreation opportunities at Lake Pillsbury including organized fishing events such as the annual pike minnow derby." USFS suggests revising it to "Identify and characterize reservoir recreation opportunities at Lake Pillsbury when the dam is removed."	Please see response to Comment U.S. Forest Service-31.
U.S. Forest Service-34	REC 2	U.S. Forest Service suggests revising the 1st sub-bullet in the Study Methods and Analysis - Visitor Surveys section as follows: The study states, "Adequacy and maintenance of recreation support facilities (e.g., boat ramps, parking areas, bathrooms, beaches, picnic areas, campgrounds)" USFS suggests revising it to "Adequacy and maintenance of recreation support facilities (e.g., river access ramps, parking areas, bathrooms, beaches, picnic areas, campgrounds)"	Study REC 2 - Reservoir Recreation Opportunities is designed to assess existing reservoir recreation use. Effects of the proposed Project will be assessed in the License Application. Potential changes to recreation support facilities could be considered as a protection, mitigation, and enhancement measure.
U.S. Forest Service-35	REC 2	U.S. Forest Service suggests revising the 3rd sub-bullet in the Study Methods and Analysis - Visitor Surveys section as follows: The study states, "Relationship between WSE, user satisfaction, ability to participate in activities, and timing of visitation" USFS suggests revising it to "Relationship between river level, user satisfaction, ability to participate in activities, and timing of visitation"	Please see response to Comment U.S. Forest Service-34.

Comment Number	Study (if applicable)	Comment	Response
U.S. Forest Service-36	REC 2	U.S. Forest Service suggests revising the 6th sub-bullet in the Study Methods and Analysis - Visitor Surveys section as follows: The study states, "Adequacy of publicly available WSE information" USFS suggests revising it to "Adequacy of publicly available river flow information"	Study REC 2 - Reservoir Recreation Opportunities focuses on reservoir recreation use. Study REC 3 - Whitewater Boating currently includes a hydrology assessment of gaging stations as well as interview and focus group discussions where whitewater recreators are invited to collaborate on the adequacy of existing information.
State Water Resources Control Board-1	AQ 12	Collection of LiDAR and bathymetry data in the Eel River downstream of Scott Dam through the Eel River Estuary.	LiDAR already exists for the entire Eel River corridor. Study AQ 12 - Scott Dam Removal will survey channel bathymetry (cross sections) to supplement available LiDAR from Scott Dam downstream to the Middle Fork Eel River confluence (approximately 49 miles) for use in hydrodynamic and sediment transport modeling. In addition, uncertainty with sediment transport modeling results increases with distance downstream of Scott Dam. Therefore, sediment transport modeling (and required LiDAR and bathymetric data) will initially focus on the reach from Scott Dam downstream to the Middle Fork Eel River where potential effects could be most pronounced. In addition, Study AQ 12 (in coordination with Study AQ 4 - Fluvial Processes and Geomorphology) will include assessing annual sediment mass balance under dam removal scenarios and comparing results with estimates of mass balance under existing conditions at key locations in the mainstem channel from Scott Dam to the Middle Fork Eel River (i.e., sediment budget nodes) and at select downstream long-term gaging sites (Dos Rios, Fort Seward, and Scotia). The need for additional bathymetry data collection effort downstream of the Middle Fork Eel River will be dependent on the results of sediment transport modeling and sediment mass

Comment Number	Study (if applicable)	Comment	Response
			balance assessment, therefore is not proposed in Study AQ 12. Accordingly, collecting additional bathymetric data from the Middle Fork Eel downstream through the estuary (approximately 120 miles) to extend modeling may not be necessary and would be very expensive (~$500k) and therefore is not proposed at this time.
State Water Resources Control Board-2	AQ 12	Quantification of the amount of sediment that could be flushed into the Eel River under different water years and sediment release options being considered.	Study AQ 12 - Scott Dam Removal currently includes estimating the present volume and spatially distributed thickness of Lake Pillsbury reservoir sediment deposits, in addition to estimating the amount of sediment that could be mobilized and transported downstream under different hydrological conditions and dam removal alternatives.
State Water Resources Control Board-3	AQ 12	Estimation of suspended sediment that will be released during Scott Dam removal into the Eel River, including anticipated sediment transport downstream through the Eel River Estuary and to the Pacific Nearshore Ocean Environment. This estimation shall include an evaluation of the initial release and subsequent releases following initial removal of Scott Dam.	Study AQ 12 - Scott Dam Removal currently includes estimating suspended sediment concentrations immediately downstream of Scott Dam following Scott Dam removal for the initial sediment pulse and subsequent levels of sediment erosion. Study AQ 4 - Fluvial Processes and Geomorphology and Study AQ 12 will also assess how this short-term suspended sediment concentration compares with estimated current suspended sediment concentrations in the lower Eel River based on historic USGS suspended sediment samples. Coarse sediment transport modeling will be performed for the 49-mile reach from Scott Dam to the Middle Fork Eel River and is not proposed for downstream reaches pending results from the modeling results between Scott Dam and the Middle Fork Eel River and the sediment mass balance

Comment Number	Study (if applicable)	Comment	Response
			assessment proposed in Study AQ 4 - Fluvial Processes and Geomorphology. Also, please see response to comment State Water Resources Control Board-1.
State Water Resources Control Board-4	AQ 12	Biological oxygen demand in the evaluation of biological impacts associated with high suspended sediment concentrations due to Scott Dam removal.	Study AQ 12 - Scott Dam Removal will be expanded to include assessment of biological oxygen demand in the evaluation of biological impacts associated with high suspended sediment concentrations following Scott Dam removal. Sediment samples will be collected for laboratory testing of sediment oxygen demand, and results will be used to estimate dissolved oxygen levels in the Eel River following dam removal.
State Water Resources Control Board-5	AQ 12	Quantification of particle sizes for sediments in Van Arsdale Reservoir and Lake Pillsbury. The sediment analysis should not only target fines but also be designed to evaluate the full range of sediments present to inform the sediment transport model and where sediment may be deposited following Scott Dam removal.	Study AQ 12 - Scott Dam Removal currently includes characterizing the current stratigraphy and physical properties (e.g., grains size distribution and density) of Lake Pillsbury reservoir sediment deposits. Characterizing sediments in Van Arsdale Reservoir is not currently proposed because the proposed Project currently includes retention of Cape Horn Dam with no change in sediment management within Van Arsdale Reservoir.
State Water Resources Control Board-6	AQ 12	Quantification of percentage and amount of sediment particle sizes in the Eel River at representative locations downstream through the Eel River Estuary.	Study AQ 4 - Fluvial Processes and Geomorphology currently includes particle size characterization of Eel River sediments at geomorphic study sites upstream of Lake Pillsbury and from Scott Dam downstream to (and including) the Middle Fork Eel River. This data was collected by Pacific Gas and Electric Company (PG&E) during study implementation in 2018. Additional particle size characterization of Eel River sediments within the 120-mile reach from the Middle

Comment Number	Study (if applicable)	Comment	Response
			Fork Eel River downstream to the estuary is not proposed at this time. The need for additional effort downstream of the Middle Fork Eel River will be dependent on the results of sediment transport modeling (Study AQ 12 - Scott Dam Removal) and sediment mass balance assessment (studies AQ 4 and AQ 12).
State Water Resources Control Board-7	AQ 12	Identification of chemicals of potential concern in Lake Pillsbury, Van Arsdale Reservoir, and the Eel River at representative locations moving downstream through the Eel River Estuary.	Results from recent chemical sampling in Lake Pillsbury and Van Arsdale Reservoir fine sediments (Geosyntec 2020) show no chemical contaminant concentrations of concern. Study AQ 12 - Scott Dam Removal will be expanded to conduct additional chemical sampling in deeper/coarser Lake Pillsbury sediments that were not previously sampled. The NOI Parties propose that any further expansion of chemical sampling in river sediments would be dependent on results of the additional samples in deeper/coarser sediments in Lake Pillsbury, with additional sampling considered if high concentrations of chemicals of concern are detected.
State Water Resources Control Board-8	AQ 12	Comparison of the chemicals of potential concern with appropriate screening levels including those pertaining to human health and ecological receptor thresholds, as discharges from Scott Dam may affect water supply associated with diversions on the Eel River.	Study AQ 12 - Scott Dam Removal will be expanded to include a comparison of results for the chemicals of potential concern with appropriate screening levels.
State Water Resources Control Board-9	AQ 12	Evaluation of nutrient dynamics and water quality alterations following removal of Lake Pillsbury and any potential effects to benthic algae (including blue-green algae).	Study AQ 3 - Water Quality currently includes evaluating the effects of Scott Dam removal on water quality by using results from reference sites upstream of Lake Pillsbury as well as water temperature modeling from Study AQ 2 - Water Temperature to inform potential changes to water quality parameters

Comment Number	Study (if applicable)	Comment	Response
			in the Eel River. Benthic Algae sampling is not currently included in Study AQ 3. Study AQ 3 will be modified to include benthic algae sampling and identification during summer and fall at upstream reference sites and sites immediately downstream of Scott Dam for comparison. Specific methods and level of detail will be discussed in the Water Temperature/ Quality Technical Workgroup.
State Water Resources Control Board-10	AQ 12	Quantification of 100-year flood plain alterations following Scott Dam removal.	Study AQ 12 - Scott Dam Removal will include assessing potential changes to 100-year flood inundation within a proposed 2-D modeling reach in the vicinity of Van Arsdale Diversion, Cape Horn Dam and residences immediately downstream where potential flooding risk at existing infrastructure and residences could be most pronounced. Additional evaluation of 100-year flood plain alterations could be considered at a later time depending on results of the sediment transport modeling and 2-D hydraulic analysis, as well as results from assessing potential changes to hydrology in Study AQ 1 - Hydrology and Project Operations Modeling.
State Water Resources Control Board-11	AQ 12	Consideration of impacts to wetlands that may be adjacent to Lake Pillsbury following Scott Dam removal.	Wetlands surrounding Lake Pillsbury will be assessed as part of Study TERR 1 - Botanical. Potential impacts to wetlands will be identified in the License Application.
Rep. J. Garamendi -1	AQ 7	"At this time, I strongly oppose draining Lake Pillsbury reservoir because I believe the parties have intentionally overlooked better alternatives. A 2018 study prepared for the Sonoma County Water Agency - one of the parties seeking to remove the Scott Dam - found that providing volitional fish passage both upstream and downstream	An alternative that includes fish passage over Scott Dam was investigated by Congressman Jared Huffman's Ad Hoc Committee and supplemental investigation was conducted by the NOI Parties in the Feasibility Study Report on Potential Licensing

Comment Number	Study (if applicable)	Comment	Response
		of the Scott and Cape Horne Dams would cost less than $64 million. By contrast, decommissioning the Scott Dam, removing or otherwise mitigating 12 million cubic yards of sediment stored within Lake Pillsbury reservoir, and other proposed project changes are estimated to cost upwards of $400 million, according to the parties' feasibility study report. These critical issues are not addressed by the initial study report filed with the Federal Energy Regulatory Commission (FERC) on September 15, 2020. During the September 29, 2020 public meeting on the initial study report prepared by the parties, it was summarily announced that the technical studies (AQ 7) and future planning documents for the integrated relicensing process would no longer include an assessment of fish passage improvements at Scott Dam other than removal of the dam. How can FERC or the parties accurately assess the impact of the proposed removal of Scott Dam on federal protected fish species without considering those benefits, if any, relative to other potential fish passage improvements at the dam?	Proposal for Potter Valley Project. The conclusion of both efforts was that fish passage over or around the dam (upstream and downstream) was not the most feasible way to meet Two-Basin Solution objectives. Study AQ 12 - Scott Dam Removal will assess the potential effects of releasing stored sediments on downstream resources and will inform the potential need for sediment management and mitigation. Study SE 1 - Socioeconomics will assess the potential economic effects of changes to Project infrastructure and operations on potentially affected communities, including the loss of Lake Pillsbury and possible changes to water supply.
Rep. J. Garamendi -2	SE 1	Furthermore, I am very concerned that the Federal Energy Regulatory Commission (FERC) scoping document #3 published on July 28, 2020, failed to consider the significant impact of the proposed draining of Lake Pillsbury reservoir on private landowners, stating erroneously that "Except for Westshore Camp, all private recreation facilities in the vicinity of Lake Pillsbury are located on Forest Service lands." This inaccurate and uninformed claim was noted by the Lake Pillsbury Alliance's comment on scoping document #3 submitted on August 27, 2020, which detailed more than 1,325 acres of privately owned land not owned by Pacific Gas and Electric Company (PG&E) within the 3,515-acre project boundary. Some 450 homeowners would suffer severe property value loss and other damages if Lake Pillsbury reservoir were to be drained, as proposed by the parties. This is in addition to the dozens of property owners operating under special	Study SE 1 - Socioeconomics is currently designed to assess potential effects of Scott Dam removal on property values near and adjacent to Lake Pillsbury and Lake Mendocino, which includes an assessment of residential and commercial properties. Also, please see response to Comment Lake Pillsbury Alliance-7.

Comment Number	Study (if applicable)	Comment	Response
		use permits with the U.S. Forest Service around Lake Pillsbury. I appreciate that FERC is not required to give equal weight or consideration to every potential impact of a proposed project change in the relicensing process. However, Congress has long mandated that FERC weigh heavily the impacts of any proposed change on adjacent private landowners. Scoping document #3 failed to do that for over a third of the acreage within the project boundary. This glaring error calls into serious question the veracity of FERC's integrated relicensing process for this project, to date.	
Rep. J. Garamendi -3	general	However, seeking to simply rewind the clock and revert a now heavily developed and interdependent water system to pre-20th century natural conditions which no longer exist does not make sense in this case. At a minimum, further independent study is needed to justify that the benefits of removing the Scott Dam outweigh the substantial costs, rather than just assuming this to be the case as the parties' Federal Energy Regulatory Commission-filings do.	The proposed studies are intended to assess the potential effects of the proposed Project, both positive and negative, as well as to inform potential costs. Study AQ 1 - Hydrology and Project Operations Modeling will assess potential changes to Project infrastructure and operations on flow conditions and water supply. Study AQ 5 - Instream Flow will assess the potential changes to Project operations and flow conditions on aquatic habitat conditions. Study AQ 9 - Fish Populations will assess the potential effects of removing Scott Dam on fish populations. Study AQ 12 - Scott Dam Removal will assess potential effects of releasing stored sediments on downstream resources and will inform the potential need for sediment management and mitigation, as well as the cost of dam removal and restoration of Lake Pillsbury footprint. Study SE 1 - Socioeconomics will assess the potential economic effects of changes to Project infrastructure and operations on potentially affected communities, including the loss of Lake Pillsbury and possible changes to water supply. Collectively, the results of these studies will inform the NOI Parties and stakeholders of the potential benefits, impacts and

Comment Number	Study (if applicable)	Comment	Response
			costs of the proposed Project. Therefore, a separate independent study to evaluate the cost/benefit of removing Scott Dam is not proposed. Also, please see response to Comment Rep. J. Garamendi-1.
Rep. J. Garamendi -4	LAND 3	Moreover, I remain deeply concerned about the loss of critical firefighting capacity if Lake Pillsbury reservoir were to be drained, as proposed by the parties.	Study LAND 3 - Hazardous Fuels Reduction Assessment will assess potential alternative firefighting drafting sites to inform evaluating the potential effects of the proposed Project on firefighting resources. Also, please see response to comment County of Lake-2.
Mendocino County Farm Bureau-1	general	Mendocino County Farm Bureau (MCFB) would like to reiterate the importance of the analysis of the water supply components related to the Project. Since a number of MCFB members are dependent upon the Potter Valley Project for their agricultural, domestic, municipal, industrial, fire suppression and recreational water supply, MCFB requests that the Federal Energy Regulatory Commission ensure that the water supply benefits and impacts from the Project in the Russian River Watershed beyond Lake Mendocino, including impacts to water rights holders, is included in the Initial Study Report analysis.	The first objective of the shared objectives for a Two-Basin solution includes minimizing or avoiding adverse impacts to water supply reliability in the Russian River and Eel River basins. The NOI Parties are committed to the shared objectives for a two-basin solution and acknowledge the importance of Russian River water users both upstream and downstream of Lake Mendocino. Also, please see response to comment Sonoma County Farm Bureau-2 regarding water rights.
Mendocino County Farm Bureau-2	general	The nexus between the discussion in Scoping Document 3 and the ISR is not apparent. How have the Federal Energy Regulatory Commission considerations discussed in Scoping Document 3 been incorporated into the ISR?	Scoping Document 3 provides guidance on the scope of cumulative effects and site-specific resource issues expected to be addressed in the Federal Energy Regulatory Commission's National Environmental Policy Act (NEPA) analysis, which will rely in-part on results from the resource studies to be implemented by the NOI Parties. The resource issues identified in

Comment Number	Study (if applicable)	Comment	Response
			Scoping Document 3 will be addressed in the License Application and were considered when developing the modified and new studies proposed by the NOI Parties to address proposed changes to Project facilities and operations. The proposed study modifications and new studies were provided as Attachment 3 and 4 of the Initial Study Report.
Mendocino County Farm Bureau-3	general	What is the timing of the release of the Federal Energy Regulatory Commission Scoping Document 4 that was mentioned at the initial study report meeting? See comment #7 in the initial study report meeting summary.	The NOI Parties are not privy to when the Federal Energy Regulatory Commission might release Scoping Document 4.
Mendocino County Farm Bureau-4	general	Several study proposals appear to be limited to qualitative analysis. Qualitative analysis is not sufficient. There needs to be quantitative analysis included in the evaluation of the various impacts from the proposed project	It is unclear which study elements the commenter is referring to. The proposed studies include a vast number of mostly quantitative analyses, however, when quantitative analyses are not possible, or feasible due to cost or other limitations, qualitative analyses may be used.
Mendocino County Farm Bureau-5	AQ 1	Relevant Information lists the hydrological period of record being from 1911-2017. It is requested that the record be extended to include data from 2018-2020. This data is available and should be included in the analysis.	The 1911–2017 data set represents 107 years of hydrologic record. It is a very robust data set that includes a full range of hydrologic conditions. The 1911–2017 period of record also includes the historic floods and droughts of record. Extending the data set for three additional years would not introduce hydrologic conditions that are not represented in the period of record, and thus is not proposed.
Mendocino County Farm Bureau-6	AQ 1	The potential information gaps section discusses the operational scenarios with the potential removal of Scott Dam and a modified Van Arsdale diversion. AQ1 is specifically listed as a study to “provide as much data as possible” to SE1 and should not be left as information gaps.	The purpose of Study AQ 1 - Hydrology and Project Operations Modeling is to fill the information gaps identified, so the study will not leave results of Operational Scenarios as an information gap.

Comment Number	Study (if applicable)	Comment	Response
Mendocino County Farm Bureau-7	AQ 1	The study area is limited and does not match the study area in SE1.	The study areas are similar, but not identical, because the potential hydrologic effects will have a different spatial extent than the potential socioeconomic effects.
Mendocino County Farm Bureau-8	AQ 1	SE1 needs to be added under relationships to other studies.	Agreed. Study AQ 1 - Hydrology and Project Operations Modeling will provide information to Study SE 1 - Socioeconomics.
Mendocino County Farm Bureau-9	AQ 2	All relevant AQ2 temperature studies that involve the establishment of various sampling/modeling sites and sampling/modeling procedures performed on or near private property should require prior approval and notification of the property owner before the activity occurs.	The NOI Parties appreciate the comment and are committed to notifying private landowners and requesting permission before accessing private property for purposes of study implementation.
Mendocino County Farm Bureau-10	AQ 3	All relevant AQ3 water quality studies that involve the establishment of various sampling/modeling sites and sampling/modeling procedures performed on or near private property should require prior approval and notification of the property owner before the activity occurs.	Please see response to comment Mendocino County Farm Bureau-9.
Mendocino County Farm Bureau-11	AQ 4	All relevant AQ4 studies that involve the establishment of various sampling/modeling sites and sampling/modeling procedures performed on or near private property should require prior approval and notification of the property owner before the activity occurs.	Please see response to comment Mendocino County Farm Bureau-9.
Mendocino County Farm Bureau-12	AQ 4	How will the recent wildfire impact on the areas surrounding Lake Pillsbury be incorporated into the analysis of sedimentation, erosion and woody debris loading?	Areas where recent fires occurred near the study area will be considered for potential changes to background sediment supply. Methods used to estimate sediment supply based on geology and reservoir sedimentation will not change. However, the potential effects of fires on sediment supply will be considered in Study AQ 4 - Fluvial Processes and Geomorphology.

Comment Number	Study (if applicable)	Comment	Response
Mendocino County Farm Bureau-13	AQ 5	Any AQ5 site visits to access minimum flows on the Eel or Russian River performed on or near private property should require prior approval and notification of the property owner before the activity occurs.	Please see response to comment Mendocino County Farm Bureau-9.
Mendocino County Farm Bureau-14	AQ 5	AQ5 is specifically listed as a study to "provide as much data as possible" to SE1. However, AQ5 doesn't include analysis of instream flows beyond Lake Mendocino. The study area should be expanded to match SE1 for the analysis of instream flow changes in relation to the impacts to socioeconomics.	As with the Eel River, the primary hydrologic changes of the proposed Project will diminish with distance downstream of Scott Dam, so the study area on both basins is prioritized in the reaches where changes may be most pronounced. Therefore, the NOI Parties do not propose to extend instream flow study sites downstream of the Middle Fork Eel River or the Russian River downstream of Lake Mendocino. However, Study AQ 1 - Hydrology and Project Operations Modeling currently includes investigating the potential effects of proposed Project infrastructure and operational changes on hydrology/flows at key locations downstream of the Middle Fork Eel River and Russian River downstream of Lake Mendocino.
Mendocino County Farm Bureau-15	AQ 5	SE1 needs to be added under relationships to other studies.	Agreed. Thank you for your comment.
Mendocino County Farm Bureau-16	AQ 7	Coho salmon habitat is not present in the proposed study area therefore analysis for this species is not required	The study plan was modified by Pacific Gas and Electric Company (PG&E) to include Coho Salmon in response to stakeholder comments received during study plan development (PG&E 2018, page A-32, comment RVIT-11). The NOI Parties propose to keep Coho Salmon as an analysis species for Study AQ 7 - Fish Passage. Also see response to Comment Mendocino County Farm Bureau-18.

Comment Number	Study (if applicable)	Comment	Response
Mendocino County Farm Bureau-17	AQ 8	Under data gaps, how will revised diversion patterns connected to the proposed removal of Scott Dam in AQ12 be connected to potential limitations to the functionality of the existing fish screen? The fish screen is already limited due to debris presence during high flows. If revised diversion patterns are limited to high flow diversions, will the existing fish screen be an inhibition to the ability to divert water through the project? If so, what fish screen alternatives are being proposed to correlate with the operational changes?	The proposed diversion patterns will increase the magnitude of diversion, and the existing fish screen system currently limits the magnitude of the diversion. Study AQ 8 - Fish Entrainment will assess the potential effects of the proposed diversion pattern on screen performance, which will provide information to subsequent engineering designs that develop alternative fish screen designs that enable the proposed increase to diversion capacity. Engineering designs would be submitted with the License Application.
Mendocino County Farm Bureau-18	AQ 9	Coho salmon habitat is not present in the proposed study area therefore analysis for this species is not required.	Historically, Coho Salmon populations occurred in both the Outlet Creek and Tomki Creek watersheds and utilized the mainstem Eel River as a migratory corridor. Recent observations of the species are rare, and these populations are presumed to be very small and potentially extirpated (NMFS 2014). Because of their historical and potential current presence in the Project Area, Coho Salmon is included in the Eel River Fish Species Composition, Distribution, Timing, and Abundance Synthesis study element of Study AQ 9 – Fish Populations.
Mendocino County Farm Bureau-19	AQ 9	Any AQ 9 site visits to perform snorkel surveys on the Eel or Russian River performed on or near private property should require prior approval and notification of the property owner before the activity occurs.	Snorkel surveys described in Study AQ 9 - Fish Populations were completed by Pacific Gas and Electric Company (PG&E) in 2018. Also, please see comment Mendocino County Farm Bureau-9.
Mendocino County	AQ 12	AQ 12 needs to fully address how the existing Project water rights connected to Lake Pillsbury storage, will be amended with the State Water Resources Control Board and the timeframe for doing so to	Comment noted; but securing the necessary water rights is outside the jurisdiction of the Federal Energy Regulatory Commission and not part of the study plan,

Comment Number	Study (if applicable)	Comment	Response
Farm Bureau-20		ensure that water rights are secured to allow for the operation of the Project before any infrastructure changes (like the removal of Scott Dam) are considered.	so it is not appropriate to assess impacts to such rights in Study AQ 12 - Scott Dam Removal.
Mendocino County Farm Bureau-21	AQ 12	Under "potential resource issues", "project nexus" and "potential information gaps" the impact on water supply reliability and water rights (both on the Russian and Eel River) needs to be specifically listed. This is a separate concern from impacts to groundwater elevations in the Project vicinity.	Study AQ 12 - Scott Dam Removal currently focuses on assessing the potential effects of releasing sediments stored in Lake Pillsbury on reaches downstream, which includes potential effects on water supply reliability. The potential effects of the proposed Project on water supply availability will be evaluated in Study AQ 1 - Hydrology and Project Operations Modeling. Also, please see response to comments Mendocino County Farm Bureau-20 regarding water rights and Sonoma County Farm Bureau-2.
Mendocino County Farm Bureau-22	AQ 12	Impacts from sedimentation of downstream Project facilities following Scott Dam removal is listed as a potential resource issue and information gap. This is a serious concern for water supply capacity and reliability. Sedimentation impacts to Project diversion infrastructure need to be fully addressed.	Agreed. The potential effects of increased sediment supply on Project facilities following Scott Dam removal, and potential impacts to water supply availability and reliability, is a priority issue that will be addressed in Study AQ 12 - Scott Dam Removal and Study AQ 1 - Hydrology and Project Operations Modeling.
Mendocino County Farm Bureau-23	AQ 12	The proposed studies focus mainly on sedimentation concerns on the Eel River. The removal of Scott Dam and the related impact analysis should not be limited to the Eel.	Study AQ 12 - Scott Dam Removal focuses on assessing the potential effects of increased sediment supply on Eel River reaches downstream of Scott Dam following removal including hydrology, water supply, and aquatic resources. The potential effects of Scott Dam removal on the Russian River and Lake Mendocino will be informed by currently proposed study elements and are expected to be negligible. The currently modeled diversion volume for the proposed Project is approximately equal to the existing operations;

Comment Number	Study (if applicable)	Comment	Response
			although, the maximum diversion rate would increase from 240 cubic feet per second (cfs) to approximately 300 cfs. Assuming the future diversion would be infrequently shut off during high flows with large sediment and debris loading (as is the current practice above 7,000 cfs), the amount of additional fine sediment in suspension in the diverted water may increase slightly over existing conditions. However, the peak flow magnitudes and frequencies (and thus proportion of total sediment load) into Lake Mendocino from the unregulated tributaries in Potter Valley and Cold Creek are considerably larger than the maximum Potter Valley Project (PVP) diversions (typically 3,000 cfs to 18,000 cfs, compared to maximum proposed PVP diversions of approximately 300 cfs). Between 1959 and 2001 (42 years), storage capacity in Lake Mendocino has only dropped from 122,400 acre-feet (ac-ft) to 116,500 ac-ft, representing a 5% reduction in storage capacity, which includes much of the period where the PVP was diverting considerably more water, and at higher peak diversion magnitude (up to 320 cfs). Because 1) Lake Mendocino has retained 95% of its original storage capacity over the past 42 years, and 2) the proposed future PVP diversion will be smaller than the diversion over most of that 42-year period, the potential impact of the proposed project on sedimentation rates in Lake Mendocino should be negligible, and additional analysis is not warranted at this time. If the results of the sediment transport analyses in Study AQ 12 - Scott Dam Removal indicate a change in understanding of

Comment Number	Study (if applicable)	Comment	Response
			potential sediment yield of the Project diversion, then this potential issue could be revisited.
Mendocino County Farm Bureau-24	AQ 12	Under "study method and analysis" there is language discussing the formation of a Scott Dam removal working group. The makeup of the working group needs to include representatives of beneficial users that could be impacted by the potential removal of Scott Dam.	Correct, Study AQ 12 - Scott Dam Removal will include establishing a technical working group composed of stakeholders knowledgeable in issues related to sediment transport, sediment management, vegetation management, hydraulic modeling, and dam removal engineering. Technical representatives from downstream beneficial users are welcome to participate in the technical working group.
Mendocino County Farm Bureau-25	AQ 12	The study area is limited to the Eel River. At a minimum, the geographic scope within the study area for AQ12 for the analysis of potential impacts to water rights should be extended to include the Russian River from the Project diversion point in Potter Valley to the confluence with Pacific Ocean to be consistent with SE1.	Please see response to comments Sonoma County Farm Bureau-2 and Mendocino County Farm Bureau-20.
Mendocino County Farm Bureau-26	AQ 12	AQ 12 has a direct relationship to the socio-economic impact analysis in SE 1. The proposed removal of Scott Dam, as analyzed in AQ 12, needs to be connected to and consistent with SE 1 to fully document the potential socio-economic impacts related to water delivery capacity, power production, water supply reliability, water rights holders and other beneficial uses of water. The proposed removal of Scott Dam will eliminate a year-round water supply connected to the Project diversion. Full qualitative and quantitative analysis should be included on the nexus of potential dam removal and impacts to the multiple beneficial water uses.	The effects of the proposed Project have the potential for a wide range of socioeconomic affects. Study SE 1 - Socioeconomics will address potential direct socioeconomic effects associated with changes to Project facilities and operations, in addition to potential indirect socioeconomic effects on water users and local communities. Study AQ 1 - will address changes to water supply availability and project operations. Study AQ 2 - Water Temperature and Study AQ 3 - Water Quality will address associated beneficial uses associated resources as the commenter indicates. The potential socioeconomic effects of the proposed Project on beneficial water uses will be included in study SE 1. Additional economic analyses associated with the proposed Project, including power generation, will be provided in the License Application.

Comment Number	Study (if applicable)	Comment	Response
			Also, please see response to comments Mendocino County Farm Bureau-20 and Sonoma County Farm Bureau-2 regarding water rights.
Mendocino County Farm Bureau-27	LAND 3	Will the hazardous fuels assessment be performed in coordination with the U.S. Forest Service account for anticipated fuel loads as a result of the 2020 wildfires adjoining Lake Pillsbury and the Project?	Study LAND 3 - Hazardous Fuels Assessment is designed to assess fuel loads and fuel reduction opportunities within the FERC Project boundary. Therefore, fuel loads within the FERC Project Boundary will be characterized, including fuel resulting from the 2020 wildfires.
Mendocino County Farm Bureau-28	LAND 3	Will the U.S. Forest Service be providing updated land management plans in relation to short- and long-term fire fuel load reduction activities?	The NOI Parties cannot speak to whether the U.S. Forest Service will provide updated land management plans; however, all relevant data from stakeholders, including any updated land management plans from the U.S. Forest Service, is welcome.
Mendocino County Farm Bureau-29	LAND 3	Will Cal Fire, U.S. Forest Service fire and local volunteer fire districts (Pillsbury, Potter Valley, etc.) be consulted in the process of identifying potential alternative water drafting sites for fire suppression? This is also a question for SE1.	The NOI Parties will reach out to Cal Fire, U.S. Forest Service fire and local volunteer fire districts (Pillsbury, Potter Valley, etc.) for any relevant information on water drafting sites and welcomes all data from interested parties that help inform Study LAND 3 - Hazardous Fuels Assessment.
Mendocino County Farm Bureau-30	REC 1–3	None of the recreation studies include Lake Mendocino within the study area. If there is no assessment of historic recreational use at Lake Mendocino within the REC 1–3 analysis, it is assumed that the full analysis will be completed under SE1.	Study REC 2 - Reservoir Recreation will be expanded to include an assessment of the boat launch usability at Lake Mendocino to assess if Project operations changes could result in water surface elevation changes that impact recreation. Study SE 1 - Socioeconomics will assess potential economic impacts of changes to Lake Mendocino recreation associated with the proposed Project.

Comment Number	Study (if applicable)	Comment	Response
Mendocino County Farm Bureau-31	SE 1	Potential information gaps connected to the socio-economic impacts related to Scott Dam removal are numerous. It is stated that in some cases, these data gaps will remain and/or full quantitative analysis will not be included. The quality of life and economic stability of multiple communities are connected to the water supply from the Project. It is unacceptable to not perform full qualitative and quantitative analysis of the impact of the potential removal of Scott Dam and the impacts to the overall beneficial users of the water supply.	Please see response to comments Sonoma County Farm Bureau-1, City of Santa Rosa-4, and City of Santa Rosa-8.
Mendocino County Farm Bureau-32	SE 1	The word adjudication is mentioned multiple times in the context of water supply reliability for various uses. Adjudication may be the preferred for a one size fits all solution, but a complete re-allocation of existing water rights is not the preferred course of action for existing water users. The context of the potential for adjudication under SE1 is not clear and requires additional explanation.	Please see response to Comment City of Santa Rosa-12.
Mendocino County Farm Bureau-33	SE 1	When did the removal of Cape Horn Dam become part of the study context since it was not included in the original feasibility study report? In the initial study report meeting summary filed by the NOI parties on October 14, 2020, comment #46 (below) asks the same question. The response to this comment stated that the mention of Cape Horn Dam removal in SE 1 was an error and that SE1 was revised to remove reference to the removal of Cape Horn Dam. This error and revision were not brought forward into the ISR document. For this reason, references to the removal of Cape Horn Dam need to be taken out of the language in SE1 and other study plan sections if applicable.	Thank you for your comment. The inclusion of Cape Horn Dam Removal in Study SE 1 - Socioeconomics was an error and was removed in the revised Study SE 1 which was filed with the Initial Study Report Meeting Summary on October 14, 2020.
Mendocino County Farm Bureau-34	SE 1	Indirect impacts are not limited to wineries in the context of agricultural processing facilities. Pear production has historically been in the top five million-dollar crops for Mendocino County. A large percentage is fresh market product that supports regional packing houses (Lake County). In addition, there are local timber milling	Indirect effects to agricultural production will be assessed under Study SE 1 - Socioeconomics. Wineries were included in the study description as an example.

Comment Number	Study (if applicable)	Comment	Response
		facilities that could be impacted. Indirect agricultural impacts need to be expanded and included in the proposed study analysis.	
Mendocino County Farm Bureau-35	SE 1	The proposed studies for SE 1 do not include data collection for water users/water rights holders on the Russian River. This analysis should not be limited to the Eel River below Scott Dam.	Study SE 1 - Socioeconomics currently includes assessing the potential effects of the proposed Project on water supply availability and reliability and associated socioeconomics effects to communities along the Eel and Russian rivers. Also, please see response to comments Mendocino County Farm Bureau-20, City of Santa Rosa-8, and Sonoma County Farm Bureau-2.
Mendocino County Farm Bureau-36	SE 1	Is cannabis being considered as “agricultural production” in the flood damage assessment below Scott Dam? Cannabis is not an agricultural commodity.	Cannabis will not be considered as an agricultural commodity under Study SE 1 - Socioeconomics.
Mendocino County Farm Bureau-37	SE 1	What is “next available water supply source” and how would the “next least costly alternative for the water be identified”? The Potter Valley Project has been in place for 100+ years. Communities and economies have developed around this water supply. Looking for additional water supply sources has come up over time. Some feasible such as recycled water programs others not so feasible such as transporting water from Ruth Lake on the Mad River in Humboldt County (Humboldt Bay Municipal Water District) for storage in Lake Mendocino. The ability to find an additional water source to replace the Potter Valley Project is not likely.	The first objective of the Two-Basin Solution is to: "Minimize or avoid adverse impacts to water supply reliability, fisheries, water quality and recreation in the Russian River and Eel River basins." The NOI Parties are committed to minimizing or avoiding adverse water supply impacts in the Russian River basin. Also, please see response to Comment City of Santa Rosa-13.
Mendocino County Farm Bureau-38	SE 1	Potential reduced water availability from the Project to Lake Mendocino will decrease stored water availability for fire suppression use. The seasonal fire-fighting water storage value study method and	Study AQ 1 - Hydrology and Project Operations Modeling includes assessing the potential effects of Scott Dam Removal and future Project operations (seasonal diversions) on flows in the Eel and Russian

Comment Number	Study (if applicable)	Comment	Response
		analysis should include Lake Mendocino and private agricultural ponds on the Russian River.	rivers, as well as storage in Van Arsdale Reservoir and Lake Mendocino. Study LAND 3 - Hazardous Fuels Reduction Assessment will evaluate potential alternative water drafting sites in the Project vicinity for firefighting. Potential direct or indirect economic effects of changes to water availability for firefighting will be assessed in Study SE 1 - Socioeconomics.
Mendocino County Farm Bureau-39	SE 1	The 2020 Highlands Economics study is listed as privileged and confidential. If this is the only current Russian River based economic analysis being sited in SE1, then there is a need to either 1) have the NOI partners perform a similar analysis and make it available for comment or 2) release the Highlands Economic study for public comment.	The Highland Economic report contains sensitive information; Study SE 1 - Socioeconomics will consider relevant and reasonably available information and will make results available to the public if appropriate.
Mendocino County Farm Bureau-40	SE 1	Mendocino County Farm Bureau does not agree with other commenters that “non-use” values should be equally assessed in the Socio-Economic analysis. The impacts to “use values” should have higher priority.	Study SE 1 - Socioeconomics will objectively weigh potential impacts to all resources equally, which is standard practice for a socioeconomic evaluation.
Sonoma County Farm Bureau-1	SE 1	We are first and foremost concerned about the economic and resource impact for our farmers and ranchers who rely on the water diverted to the Russian River from this existing Project. Over 15,000 acres of grapes are impacted by the Potter Valley Project, along with the residents of Cloverdale and Guerneville. We think there is great importance in the be continued analysis throughout the process on these critical topics so that all factors of the potentially detrimental impacts be considered.	The first of the NOI Parties’ shared objectives for a two-basin solution includes minimizing or avoiding adverse impacts to water supply reliability in the Russian River and Eel River basins. The NOI Parties are committed to the shared objectives for a two-basin solution and acknowledge the importance of Russian River water users both upstream and downstream of Lake Mendocino. Study AQ 1 - Hydrology and Project Operations Modeling will assess the potential effects of the proposed Project on water supply availability to the Russian River. In addition, Study SE 1 - Socioeconomics will assess potential socioeconomic effects of the proposed Project to agriculture-based businesses and communities along the Russian River.

Comment Number	Study (if applicable)	Comment	Response
Sonoma County Farm Bureau-2	AQ 12	Specifically, in Study AQ 12: Scott Dam Removal under potential resource issues, project nexus and potential information gap the impact on water supply reliability and water rights (both on the Russian and Eel River) needs to be included.	Study AQ 12 - Scott Dam Removal currently includes collecting information to inform an assessment of the potential effects of releasing stored sediment in Lake Pillsbury following dam removal on diversion infrastructure downstream, including Van Arsdale Diversion. Reference to potential effects of Scott Dam removal on water supply reliability are included under Potential Resource Issues (bullets 4 and 5), Project Nexus (bullet 1), and Potential Information Gaps (bullet 4). Study AQ 1 - Hydrology and Project Operations Modeling currently includes assessing the potential effects of the proposed Project on hydrology and water supply in the Eel and Russian River Basins. In addition, Study SE 1 - Socioeconomics currently includes assessing the potential effects of the proposed Project on water supply availability and reliability and associated socioeconomics effects to communities along the Eel and Russian rivers.
Sonoma County Farm Bureau-3	AQ 12	The current study area is limited to the Eel River, however, the geographic scope within the study area for AQ12 for the analysis of potential impacts to water rights should be extended to include the Russian River from the Project diversion point in Potter Valley to the confluence with Pacific Ocean to be consistent with SE 1. The proposed removal of Scott Dam and the elimination of a year-round water supply will be a long-term impact to multiple beneficial water users.	Study AQ 12 - Scott Dam Removal does not currently directly assess impacts to water rights in the Eel River. Study AQ 12 currently includes collecting information to assess the potential effects of increased sediment supply resulting from Scott Dam removal and the potential for increased sediment deposition to inhibit water intake systems (private and public) on the Eel River downstream of Scott Dam. Study AQ 1 - Hydrology and Project Operations Modeling will assess the effects of the proposed Project, including removal of Scott Dam, on water supply availability to the Russian River.

Comment Number	Study (if applicable)	Comment	Response
			Also, please see response to Comment Sonoma County Farm Bureau-2 regarding water rights.
Sonoma County Farm Bureau-4	SE 1	In Study SE 1: Socioeconomics it is stated that in some cases, data gaps will remain and/or full quantitative analysis will not be included. The quality of life and economic stability of multiple communities are connected to the water supply from the Project. It is unacceptable to not perform full qualitative and quantitative analysis of the impact of the potential removal of Scott Dam and the impacts to the overall beneficial users of the water supply.	Please see response to comment Sonoma County Farm Bureau-1, Sonoma County Farm Bureau-2, City of Santa Rosa-5, and City of Santa Rosa-11.
Sonoma County Farm Bureau-5	SE 1	The proposed studies for SE 1 do not include data collection for water users and water rights holders on the Russian River. Reduced water availability from the Project to Lake Mendocino will reduce stored water availability for fire suppression use which would have a critical impact on already fire ravaged communities within the watershed. For this reason, the seasonal fire-fighting water storage value study method and analysis should include Lake Mendocino and private ponds on the Russian River.	Water users on the Russian River will be evaluated as part of Study SE 1 - Socioeconomics. Also, please see response to comment Sonoma County Farm Bureau-2 regarding water rights. Please see additional information provided in the response to comments City of Santa Rosa-4 and City of Santa Rosa-8.
County of Lake-1	SE 1	There are certainly "tradeoffs" benefitting the NOI Parties' with their proposed changes. The negative impacts are borne by the County of Lake and the positive impacts resulting from this "tradeoff" will be enjoyed by the NOI Parties. It truly strains credulity that any proposal can be seriously considered where such a significant burden will be borne by Lake County with no corresponding positive impact. Apparently, the "tradeoff" scenario only applies to the NOI Parties who are proposing to trade the considerable negative impacts to Lake County for very positive impacts for themselves. Certainly, the NOI Parties will agree to carefully-worded studies to determine what will undoubtedly be couched as minimal impacts to small, rural Lake County. The NOI Parties will consider property value	The NOI Parties are committed to each other and to working with all stakeholders, including Lake County. Lake County has participated in Congressman Huffman's Ad Hoc Committee and the Federal Energy Regulatory Commission process and the NOI Parties have been and will continue to meet with Lake County to develop solutions for addressing Lake County's concerns. Study SE 1 - Socioeconomics will assess both the potential positive and negative impacts to local communities, including the potential impacts to Lake County. No weighting or priority will be given to one specific impact.

Comment Number	Study (if applicable)	Comment	Response
		loss as to the Lake Pillsbury community and regional spending from seasonal property owners. The NOI Parties will agree to consider any studies which are narrowly defined in a manner to illustrate their view that impacts to Lake County are negligible and unimportant. None of this will address the fundamental wrong that permeates their proposal - the NOI Parties will sacrifice the County of Lake to ensure their goals are met. Negative impacts in the Lake Pillsbury area will create a ripple effect throughout Lake County. The NOI Parties seek to determine the future of the Lake Pillsbury Community, the economic factors which influence the County of Lake's recovery after a prolonged and destructive pandemic, what is allowed to exist in the County's ecosystem, and the very access to an available water source in a county plagued for years by wildfires.	
County of Lake-2	SE 1	Modifications to the Initial Study Report, as provided in Study SE 1, propose to use least cost approach to determine the next available water supply source and to consider "if it's better to accept increased risks of fires compared to paying a higher cost for additional water." It is astounding that such a consideration is given any validity after the horror faced in Northern California as a result of wildfire. The residents of the County of Lake have repeatedly faced those horrors and the County has lost 60% of its land mass to wildfire. Yet, the NOI Parties presume to analyze the impacts of wildfire risks for the County of Lake. This is a cost-benefit analysis where the cost is borne by one other than the NOI Parties proposing it. It assumes there are comparable alternate sources for additional water. Modifications to the ISR point to consultation with the United States Forest Service. Such consultation should not be limited to the Forest Service. The fire chiefs in the County of Lake can speak to the critical nature of Lake Pillsbury in its fire-fighting efforts, not just in prior years but in this very year.	The NOI Parties are committed to a comprehensive and objective assessment of potential effects of the proposed Project on firefighting resources and communities in the region. Study LAND-3 - Fuels Assessment will identify alternative water drafting sites for fires that might be used in the absence of Lake Pillsbury, including those that can be used during years of extreme drought. Study Land 3 does not assume that there are comparable alternate sources for additional water, rather, the study is intended to objectively document what alternative sources of water are potentially available for firefighting. Also, please see response to Comment Mendocino County Farm Bureau-29. Study SE 1 - Socioeconomics will utilize data developed under Study LAND 3 to assess economics of potential

Comment Number	Study (if applicable)	Comment	Response
		Moreover, an environmental review demands much more than a simple cost-benefit analysis. There should be a Project-specific analysis of the Project's exacerbating impacts on wildfire risk to determine whether the Project as proposed will exacerbate the risk of wildfire ignition and spread. Such an analysis must take Lake County specifically into account. The risks of this Project should not be imposed upon the County of Lake in order to affect a hypothetical benefit of to the NOI Parties that fish passage will be enhanced. The wildfire risks of this Project should not be imposed upon the County of Lake for a proposal that will very likely fail to acquire adequate funding for anything other than the destruction of Scott Dam.	changes in quantity of water available for use fighting fires. The least-cost approach is an economics analysis tool used to determine the value of different water sources for firefighting based on the next least expensive water source available.
City of Santa Rosa-1	SE 1	PAGE D-3 (POTENTIAL RESOURCE ISSUE(S)) Comment No. 1 - We recommend that a list of definitions be added for some of key terms used in this Study (e.g., agricultural producer, domestic water user, M&I water user)	These terms will be defined in subsequent documents for Study SE 1 - Socioeconomics including Technical Study Reports and the Preliminary Licensing Proposal/Draft License Application.
City of Santa Rosa-2	SE 1	PAGE D-3: PROJECT NEXUS, FIRST 4 BULLETS: Comment No. 2 states that specific types of impacts to be evaluated because they may have "direct effects. . . on the affected population." The specific types of impacts should be more clearly identified. The Study should indicate how "the value of water supply reliability" compares to the other categories of impacts, and the degree to which the comparison will be subjective. E.g., will the Study's approach to ascertaining "value" in this context be reduced to economic value, or will other factors also be considered? If so, which values and why?	Study SE 1 - Socioeconomics will be limited to the economic value. All economic impacts will be evaluated equally. In addition, the NOI Parties may or may not make decisions based on primarily non-economic factors. The first objective of the Two-Basin Solution is to: "Minimize or avoid adverse impacts to water supply reliability, fisheries, water quality and recreation in the Russian River and Eel River basins." The NOI Parties are committed to minimizing or avoiding adverse water supply impacts in the Russian River basin.
City of Santa Rosa-3	SE 1	PAGE D-3: PROJECT NEXUS, FIRST 4 BULLETS: In addition, formation of the proposed Regional Entity, including its boundaries, mission, and governance, will have an impact on overall project economics and socioeconomics, including economic effects on all classes of water	Study SE 1 - Socioeconomics will assess the potential effect of the proposed Project on the contribution of water to the value of agricultural production, municipal and industrial use, and domestic water for

Comment Number	Study (if applicable)	Comment	Response
		users, and should be analyzed to ensure that no water user or class of water users will be obligated to pay any cost that is disproportionate to the benefit to be received. Identification of such effects should include both capital and operational costs over the life of the project.	different hydrology (e.g., wet vs. dry) with considerations for fixed and variable costs (reliability), and seasonality. Project economics will be evaluated in the License Application.
City of Santa Rosa-4	SE 1	PAGE D4: POTENTIAL INFORMATION GAPS - DIRECT IMPACTS: Comment No. 3 - Regarding "direct impacts of project options," the first bullet is limited to "water intake systems." True comparison of direct impacts should include the effects on water systems as a whole and not just their intakes. Evaluation of impacts on a single farm that has diversion rights and an intake system cannot be compared to evaluation of impacts on large community water supply and distribution systems simply based on information about their respective intake systems.	Study SE 1 - Socioeconomics will assess water supply reliability value to users on the Russian and Eel rivers. The assessment for users with intake structures on the Eel River will focus on potential impacts of sedimentation associated with the removal of Scott Dam. Please see the Study Methods and Analysis section of the study description.
City of Santa Rosa-5	SE 1	PAGE D4: POTENTIAL INFORMATION GAPS - DIRECT IMPACTS The word "value" or "values" is used 5 times in the discussion of "direct impacts." The manner in which the analysis will be done for competing water uses should be more clearly defined or explained - e.g., will the values and impacts considered be objective or subjective or both? Will they be qualitative or quantitative or both?	The degree to which study elements can be assessed quantitatively is dependent on the information and data that can be obtained. Quantitative assessments will be conducted where data permits such an assessment. Unit values (e.g., dollars per acre-foot and dollars per recreational fishing day) will be determined by considering the range of available information and data.
City of Santa Rosa-6	SE 1	PAGES D4 - D5: POTENTIAL INFORMATION GAPS - INDIRECT IMPACTS: Comment No. 4 - Regarding "indirect impacts of project options," community water systems for hundreds of thousands of people will be impacted in the same or similar ways as are listed in this summary for various forms of businesses. indirect impacts, both quantitative and qualitative, on communities from potential changes in the reliability of their water supply should also be evaluated.	Study SE 1 - Socioeconomics currently includes an analysis of indirect effects associated with change in water supply availability and water reliability for municipal water users. Please see the section of the Study SE 1 study description titled: Study Methods and Analysis, and the study element titled: *Water supply reliability value to agricultural producers, M&I water users, and domestic water users (including non-commercial agriculture) due to a potential change in*

Comment Number	Study (if applicable)	Comment	Response
			water supply from the Eel River, Russian River, Lake Pillsbury, and Lake Mendocino.
City of Santa Rosa-7	SE 1	PAGES D5–D6: PROPOSED STUDIES/ANALYSIS - SIGNIFICANT INFORMATION GAPS: Comment No. 5 - The Water Agency's 2016 Fish Flow Draft EIR, as well as the National Marine Fisheries Service's (NMFS) 2008 Russian River Biological Opinion, should be added to the list of relevant information (see also Comment No. 7, below).	Thank you for your comment. The suggested references will be considered during implementation of Study SE 1 – Socioeconomic.
City of Santa Rosa-8	SE 1	The 2nd Bullet says primary data should be collected on the Eel River below Scott Dam. Additionally, such data should be collected for all diversions from both the Eel and Russian Rivers, grouped by critical river reaches, and should include all competing water uses, including consumptive uses based upon diversions under riparian or appropriative rights, those based upon water supply contracts, and non-consumptive uses such as fisheries and recreation.	Study SE 1 - Socioeconomics currently includes primary data collection of water users who have water intake systems on the Eel River downstream of Scott Dam to assess potential effect of increased sediment supply on water intake systems following Scott Dam removal. Study AQ 12 - Scott Dam Removal will assess the potential for increased sediment supply following Scott Dam removal to deposit in reaches downstream (which could affect water intake systems). A similar analysis for the Russian River is not proposed since the potential effects of releasing sediment following Scott Dam removal is primarily a concern for the Eel River.
City of Santa Rosa-9	SE 1	The Study should clearly distinguish between qualitative and quantitative analyses, and describe the criteria used for any relative ranking between and among the various impacts to be evaluated.	Please see response to Comment City of Santa Rosa-5.
City of Santa Rosa-10	SE 1	PAGE D.6: EXTENT OF STUDY AREA: Comment No. 6 - In addition to the various reaches in each river system, potential impacts of Project operations to Lake Sonoma should be within the Study Area Extent, as should potential impacts on consumers in areas served by water users with appropriative rights, in order to fully compare and contrast relevant and appropriate socioeconomic impacts.	Water supply from Lake Sonoma is not anticipated to change as a result of the proposed Project. Water availability for appropriation by other water users in the Russian Basin may change as a result of different Project operations. Study AQ 1 - Hydrology and Project Operations Modeling will evaluate the amount and frequency of changes in water supply availability.

Comment Number	Study (if applicable)	Comment	Response
			Existing information will allow estimation of socioeconomic impacts of any such changes as modeled in that study.
City of Santa Rosa-11	SE 1	PAGE D.7 . WATER SUPPLY RELIABILITY VALUE TO WATER USERS: Comment No. 7 - This paragraph discusses review of other studies that impact instream flows regarding changes in water volume from the Eel and Russian Rivers. On September 24, 2008, National Marine Fisheries Service (NMFS) issued a 15-year Biological Opinion for waler supply, flood control operations, and channel maintenance conducted by the U.S. Army Corps of Engineers (USACE), Sonoma County Water Agency (Water Agency), and Mendocino County Russian River Flood Control and Water improvement District in the Russian River watershed. Compliance with this Biological Opinion is critical to maintaining the water rights and water quantities required for the supply of water to the water contractors. Determining the water supply reliability value in the Russian River must take into account continued compliance with this Biological Opinion. Similarly, the Draft EIR prepared by the Water Agency should be taken into account because of its comprehensive review of issues related to and impacts of all water uses in the Russian River. The 2nd Bullet mentions "considerations for appropriative water rights," but is silent with regard to considerations for other forms of water rights and entitlements for water users and classes of users from both the Eel and Russian Rivers.	Study SE 1 - Socioeconomics currently utilizes existing and future modeling information derived in Study AQ 1 - Hydrology and Project Operations Modeling to assess water supply availability and water reliability under the proposed Project. Existing operations modeled for the Russian River under Study AQ 1 will be based on the 2008 National Marine Fisheries Service Biological Opinion (NMFS 2008) and State Water Resources Control Board Decision 1610.
City of Santa Rosa-12	SE 1	Similarly, the 3d Bullet mentions "potential adjudication costs" but lacks explanation or context. lf the Study authors are suggesting the possibility of a limited or system-wide water rights adjudication, that seems to imply an assumption that anticipates some form of re-allocation of available water resources outside of or in addition to normal water rights implementation and enforcement. lf that is the intention, a clear explanation of the purpose, scope, and context for	Language referring to water rights adjudication and adjudication costs in Study SE 1 - Socioeconomics and will be removed.

Comment Number	Study (if applicable)	Comment	Response
		such an adjudication (a complex, lengthy, and expensive undertaking) should be provided.	
City of Santa Rosa-13	SE 1	The 4th Bullet should be expanded to explain the purpose of using "a least cost approach to determine the next available water supply source." Least cost to whom? Next available water supply for whom? Is this to be evaluated by each individual water user? Or class of water user by (or versus) other class of water user? What purpose does such an analysis serve in the context of this Study? When performed, this type of analysis should be vigorous and extend well beyond a simple literature review of previous studies. For example, it should not be limited to published studies that estimate household willingness to pay to increase water supply reliability and to avoid water shortages.	The least-cost approach is an economics analysis tool used to determine the value of different water sources based on the next, least expensive water source available. A least-cost approach will be used to assess potential economic trade-offs to agricultural producers, municipal and industrial water users, and domestic water users (including non-commercial agriculture) due to a potential change in water supply availability from the Eel River, Russian River, Lake Pillsbury, and Lake Mendocino. Study SE 1 - Socioeconomics will consider the full range of information and data available to identify values for alternative water supply provisions.
City of Santa Rosa-14	SE 1	The methodology(ies) to be used to attempt to evaluate 'Water supply reliability value" to various types of water users need to be explained, and the criteria for any type of ranking or other relative comparison need to be defined and fully explained.	Study SE 1 - Socioeconomics will utilize existing and future modeling information derived in Study AQ 1 - Hydrology and Project Operations Modeling to assess potential changes in water supply availability and reliability to agricultural producers, municipal and industrial water users, and domestic water users (including non-commercial agriculture) on the Eel and Russian rivers under the proposed Project. Suitable values for water supply reliability will be determined by available data and what is deemed the most applicable value(s) at the time the study is conducted. Given the range of possible values, it is difficult to determine *a priori*.

Comment Number	Study (if applicable)	Comment	Response
Friends of the Eel River-1	SE 1	Friends of the Eel River requests that each of the proposed study plans which includes analysis of Scott Dam removal be amended to include a parallel analysis of Cape Horn Dam removal. Most essentially, this would include SE 1, socioeconomics, and AQ 7, fish passage. Cape Horn Dam removal analysis in both studies would closely parallel the analysis of Scott Dam removal already described in detail in both study plans. The issues, methods, and relevant questions for Cape Horn Dam closely track those already described for Scott Dam.	Please see response to Comment U.S. Fish and Wildlife Service-2.
Friends of the Eel River-2	SE 1	As detailed below, SE 1 should also be amended to require analysis of the potential public health impacts of the extremely high mercury levels found in fish in the Lake Pillsbury reservoir, as well as to clarify that its analysis of economic impacts will be based on the fantasy that Pacific Gas and Electric Company (PG&E) can somehow be compelled to keep Scott Dam standing and operating even though it cannot relicense the dam.	Study AQ 3 - Water Quality includes the sampling of fish tissue to characterize mercury concentrations. Results from the tissue sampling were reported in the Initial Study Report (see the Technical Study Summary for Study AQ 3 provided by PG&E). The proposed Project includes removal of Scott Dam, which is expected to remove conditions that cause mercury methylation and reduce mercury concentrations in fish. Therefore, the NOI Parties are not proposing to evaluate the potential public health impacts of the mercury found in fish in Lake Pillsbury.
Friends of the Eel River-3	New Study	Additionally, a separate study plan parallel to AQ 12, Scott Dam removal, should be required to analyze all aspects of Cape Horn Dam removal. Again, the issues, methods, and relevant questions for Cape Horn Dam removal are essentially identical to those already described for Scott Dam in AQ 12.	Please see response to Comment U.S. Fish and Wildlife Service-2.
Friends of the Eel River-4		As we noted in our comments on Scoping Document 3 (SD3), the Federal Energy Regulatory Commission's (FERC) process of environmental analysis under National Environmental Policy Act (NEPA) is fundamentally flawed, in that it takes the status quo as the No Action Alternative. The California State Water Resources Control Board (State Water Board) will require an analysis of the project	Please see response to Comment U.S. Fish and Wildlife Service-2.

Comment Number	Study (if applicable)	Comment	Response
		under the California Environmental Quality Act (CEQA), in which a true No Project alternative must be evaluated. As well, FERC will have to consider Cape Horn Dam removal as a feasible alternative under NEPA. It makes very little sense to refuse to analyze the question at this point - unless the purpose of the refusal is to make it clear that Cape Horn Dam removal is off limits, regardless of the facts regarding fish passage. This is not the deal we agreed to when we agreed to support a continued diversion of Eel River water to the Russian River.	
Friends of the Eel River-5	SE 1	It also makes no sense to conduct a study, as SE 1 is proposed, which will analyze the proposed project against the status quo ante. In the wake of PG&E's withdrawal of its relicensing application, there is no proposal, let alone any feasible proposal, to keep Scott Dam in place. Such an economic analysis will of necessity presume that PG&E can be compelled to keep maintaining Scott Dam indefinitely - when all available evidence indicates the opposite is true. An analysis that counts benefits but ignores costs is unlikely to prove informative. SE 1 should provide a full account of all expenditures by PG&E necessary to maintain the status quo and explain as clearly as possible that its basic assumption that the status quo will continue is nothing but a fantasy.	Consistent with the Federal Energy Regulatory Commission's (FERC's) relicensing requirements, Study SE 1- Socioeconomics is intended to assess the proposed Project relative to existing conditions. The NOI Parties acknowledge the potential need for an alternative without the Two-Basin Solution. FERC will determine whether their National Environmental Policy Act (NEPA) analysis will include additional alternatives for analysis.
Friends of the Eel River-6	SE 1	The response [to our question at the Initial Study Report meeting] misses the point of the question. It appears to deny that there are or could be public health impacts from consumption of such high levels of mercury. While subsistence fishing would obviously present an even more dangerous scenario, consumption of fish with such high levels of mercury by, e.g., pregnant women and young children is clearly quite dangerous given mercury's well-documented impacts as a neurotoxin and developmental hazard.	Please see response to Comment Friends of the Eel River-2.

Comment Number	Study (if applicable)	Comment	Response
		Has Pacific Gas and Electric Company (PG&E), Federal Energy Regulatory Commission, the U.S. Forest Service or any other party taken any steps to provide information to the public about high levels of mercury, especially in older, larger Lake Pillsbury Reservoir fish? To prevent consumption of fish by at-risk populations? Absent such information, people are much more likely to consume fish that could be hazardous. Analyzing the economic effects on fishing is not the same as analyzing the potential public health effects of this powerful neurotoxin. The study plan should be revised to include consideration of potential human health effects from methylmercury consumption, including consequent economic impacts, not just impacts on fishing and related activities.	
Friends of the Eel River-7	General	Further work is needed to clarify how a sustainable diversion from the Eel to the Russian can best be constructed and operated, and how fish passage consistent with the promises of the Two Basin Principles will be provided at Cape Horn Dam. The Planning Agreement Group further analyzed these issues in their Feasibility Study. However, because this document still has not been released to the public and to partner agencies, its utility remains unfortunately limited.	Please see response to Comment U.S. Fish and Wildlife Service-2.
Friends of the Eel River-8	AQ 7	As Friends of the Eel River (FOER) explained in our comments on the Feasibility Study Report (FSR), we still need an integrated analysis of the Van Arsdale diversion works, the Cape Horn Dam, and the Van Arsdale fishway together. These questions are not afterthoughts which can be resolved following preparation of a draft license, but central issues that need to be fully analyzed and addressed in a comprehensive fashion if any future version of the PVP is to function sustainably for Eel River fisheries as well as Russian River water supplies.	Study AQ 7 - Fish Passage currently includes assessing improved upstream and downstream fish passage alternatives (including conceptual designs, costs, and estimated efficacy) at Cape Horn Dam in collaboration with the fish passage technical working group. Designs will consider potential short-term and long-term effects of Scott Dam removal and associated changes to sediment supply on Cape Horn Dam fish ladder. Design considerations will include consideration of

Comment Number	Study (if applicable)	Comment	Response
		The Planning Agreement Group's FSR fails to acknowledge this fact. This failure, and their refusal to analyze Cape Horn Dam removal in their proposed Study Plans, are flatly inconsistent with the Two Basin Principles. Evidence continues to accumulate that take of listed species in violation of the Endangered Species Act is occurring at the Van Arsdale fishway. FOER provided evidence to the Federal Energy Regulatory Commission (FERC) that the fishway has been blocked repeatedly during steelhead migration by sediment and debris carried by high flows. FERC misclassified that problem as "inadequate maintenance" rather than the systemic problem it clearly is. The fact that Pacific Gas and Electric Company (PG&E) is now rushing to install doors apparently intended to keep sediment and debris out of the Fish Hotel structure on the fish ladder makes it very clear that the problem is not "inadequate maintenance."	working under extreme sediment and woody debris loads. Also, please see response to Comment U.S. Fish and Wildlife Service-2.
Friends of the Eel River-9	AQ 7	As well, it is clear that predation - especially by otters - in the Van Arsdale fishway presents very serious problems both in terms of impacts on fish passage and the difficulty of preventing those impacts.	Study AQ 7 - Fish Passage currently includes assessing improved upstream and downstream fish passage alternatives (including conceptual designs, costs, and estimated efficacy) at Cape Horn Dam in collaboration with the fish passage technical working group. Predation will be considered as one of the design/evaluation criteria for different fish passage improvement alternatives considered in Study AQ 7. Also, please see response to Comment U.S. Fish and Wildlife Service-2.
Friends of the Eel River-10	AQ 7	At this point, the technical burden of showing that passage consistent with the Two Basin Principles can be provided at the Cape Horn Dam location should be borne by those who would prefer to keep Cape Horn Dam in place. Thus, Cape Horn Dam removal must be analyzed	Please see response to Comment U.S. Fish and Wildlife Service-2.

Comment Number	Study (if applicable)	Comment	Response
		to the extent necessary to provide for dam removal, if dam removal is required to achieve the Two Basin Principles. Cape Horn Dam removal and replacement of the diversion works are entirely consistent with a Two Basin Solution that will prove resilient and sustainable. Nonetheless, both the Planning Agreement Group's Feasibility Study Report and the Federal Energy Regulatory Commission's Scoping Document 3 (SD3) reject our continued requests to analyze Cape Horn Dam removal. Similarly, the Initial Study Report makes it clear that the PAG are flatly refusing to study Cape Horn Dam removal: (…)	
Friends of the Eel River-11	AQ 7	The Planning Agreement Group (PAG) and the Federal Energy Regulatory Commission both appear to be proceeding on the assumption that the Van Arsdale fish ladder can, after a century of failed attempts, finally be sufficiently modified to provide either the volitional passage that National Marine Fisheries Service will require under the Federal Power Act, or the still greater degree of passage that the PAG have agreed to under the Two Basin Principles, without the need to remove Cape Horn Dam. Neither the PAG nor (FERC) have provided evidence that modifications to the Van Arsdale fish ladder alone will provide adequate fish passage under either standard. Even if it is possible to rebuild the Van Arsdale ladder as the PAG appear to believe, the question of cost-effectiveness remains…Clearly, the PAG may define their project as including Scott Dam removal, yet still request a study plan analyzing Cape Horn Dam removal. Such a study is necessary to fill the data gaps which clearly exist concerning the costs and consequences of either removal or modification of Cape Horn Dam. Indeed, absent such an analysis it would appear impossible to fully evaluate the passage options at the nexus of Cape Horn Dam and the Van Arsdale fish ladder. Because the diversion works are just upstream from Cape Horn, these questions are also directly implicated in the still-unresolved question as to what diversion works might be more sustainable than the current	Please see response to Comment U.S. Fish and Wildlife Service-2.

Comment Number	Study (if applicable)	Comment	Response
		installation. In sum, analysis of Cape Horn Dam removal is an indispensable piece of the larger analysis that must be conducted before decisions can be made about whether and how to move forward with the proposed project. Without an analysis of Cape Horn Dam removal, it will not be possible to fully specify the license conditions necessary to secure adequate fish passage.	
Friends of the Eel River-12	AQ 7	As noted in our comments on the Feasibility Study Report (FSR), Cape Horn Dam removal must be studied in all of the same ways that Scott Dam removal needs to be analyzed prior to removal. Of particular importance is estimating the cost of removal, and if necessary to provide an alternative structure to permit continued diversion during the wet season. Without reliable cost estimates, we cannot meaningfully compare the various options for fish passage and water diversion.	Please see response to Comment U.S. Fish and Wildlife Service-2.
Lake Pillsbury Alliance-1	REC 1	The Alliance disagrees with the meeting summary's proposal to modify three FERC-approved studies. Specifically, the Alliance disagrees that the following NOI Parties modification of FERC-approved studies, as provided in its Initial Study Report (ISR) meeting summary, satisfy the ILP regulations… First, the Alliance disagrees that the modifications to Study REC 1 - Recreation Facility Assessment are "appropriate to the facts of the case" because it excludes local users of the recreational facility from the study. Under 16 U.S.C. § 797(e), the Commission shall "give equal consideration to the purposes of . . . the protection of recreational opportunities, and the preservation of other aspects of environmental quality." (emphasis added). The modification to merely "extend visitor survey dates to include the elk breeding season" is inadequate and falls short of considering the impacts to all users of the recreation facilities. During the comment period, commenters raised concerns that the study needs to be more inclusive—and that it needs to take	Study REC 1 - Visitor Surveys, currently includes any recreation users, including Westshore Campers, if they are using the Project recreation facilities, which includes campgrounds, boat launches, and day use areas — 13 facilities in all. In addition, Study REC 2 - Reservoir Recreation currently includes the Westshore Campers as part of the focus group meeting/workshop. Currently, Study REC 2 focus group meeting/workshop will include "Lake Pillsbury homeowners and local users", and the Westshore Campers will be included under the "local users" category.

Comment Number	Study (if applicable)	Comment	Response
		into consideration seasonal and full-time residents that live and recreate in Lake Pillsbury. 18 C.F.R. § 5.15(d). In its ISR, the NOI Parties provide a table with five general facilities: family campgrounds, group campgrounds, day use facilities, recreation access roads, and project recreation trails. The Alliance members, including homeowners, utilize these facilities. And yet, the NOI Parties seek to exclude the homeowners by putting them under the REC 2 study for reservoir recreation. It is inappropriate to exclude existing homeowners and residents that use the Lake Pillsbury "recreation facility" from REC 1 - Recreation Facility Assessment, and unjustified by the NOI Parties. The Alliance also disagrees with the ISR meeting summary's failure to include the Westshore Campers, comprising of 80 families with private facilities located within the Project boundary on land leased from Pacific Gas and Electric Company (PG&E), in the Study REC 1 - Recreation Facility Assessment. There are six family campgrounds provided in Study REC 1. When the Alliance asked whether the Westshore Campers will be included in Study REC 1, the NOI Parties responded with an inappropriate distinction between "local users" and "visitors." The NOI Parties responded that "If these visitors utilize Lake Pillsbury recreation facilities, then they would be included . . . as part of Study REC 1 - Recreation Facility Assessment." However, as a "local user, these visitors would be captured . . . as part of the Study REC 2 - Reservoir Recreation Opportunities." The exclusion of local users and the Westshore Campers is inappropriate and risks rendering a conclusion based on incomplete data for Study REC 1 - Recreation Facilities Assessment. In addition, other peak-period recreational users are likely to be missed if visitor surveys are limited to distribution in the six campgrounds. The peak-period recreational users include boat-in campers, backpackers, and those who camp or stay in cabins at the Lake Pillsbury Resort. Other seasonal recreational users with sport specific peak periods will need to be captured, e.g., deer, elk and duck hunting seasons, off-highway	

Comment Number	Study (if applicable)	Comment	Response
		vehicles (OHV), hang-gliding, mountain biking, "off-season" camping. While some are not lake specific, the lake itself is the anchor for the Mendocino National Forest. Thus, isolating visitor surveys to only peak periods of major uses will exclude all other users and be a disservice to the public.	
Lake Pillsbury Alliance-2	TERR 2	Second, the Alliance disagrees with the modifications to the Technical Study Summary (TSS) provided by Pacific Gas and Electric Company (PG&E) for TERR 2 - Wildlife Resources as it does not include all relevant technical summaries. During the ISR meeting, a consultant indicated that they used the most recent Bald Eagle monitoring report from PG&E. However, the ISR meeting summary fails to reference the 2019 PG&E Bald Eagle Monitoring Report (2014-2019) that was filed with the Federal Energy Regulatory Commission in December 2019 or include the monitoring report as part of its "PG&E Technical Study Summaries for Study TERR 2." At Lake Pillsbury, the nesting productivity of bald eagles increased during the 2015-2019 monitoring period compared to the 2009-2014 monitoring period. This monitoring report shows four new bald eagle nesting territories and that "[a]ll four territories at Lake Pillsbury produced some young during the 2015-2019 monitoring period." Despite this, the NOI Parties do not incorporate the data in its ISR meeting summary.	The Technical Study Summary for Study TERR 2 - Wildlife Resources presents a summary of data and information that was developed by Pacific Gas and Electric Company (PG&E) prior to January 25, 2019. The 2019 Bald Eagle monitoring report was not available at the time PG&E prepared the Technical Study Summary. The NOI Parties' proposed Study TERR 2 - Wildlife Resources expands the period for which bald eagle data will be summarized. Please see the fourth bullet under the Relevant Information section. The NOI Parties intend to include all available information from PG&E's Bald Eagle monitoring program to evaluate potential effects of the proposed Project in the License Application.
Lake Pillsbury Alliance-3	AQ 10	Third, the Alliance disagrees with the modifications to the Technical Study Summary (TSS) provided by Pacific Gas and Electric Company (PG&E) for Study AQ 10 - Special Status Amphibians and Aquatic Reptiles—particularly its claim to withhold information on the Foothill Yellow Legged Frog 2018 Clutch Data as "confidential." The NOI Parties seek to keep the study confidential under 18 C.F.R. § 385.1112 because it "contain[s] details on the locations of special-status biological resources and qualifies] as Confidential Information[.]" However, 18 C.F.R. § 385.1112 is inapplicable here—the rule only applies to "Petitions for Adjustments Under the [Natural Gas Policy	It is common practice to protect survey information and data for sensitive species which, if released, could jeopardize the species. Foothill Yellow-legged Frog and Western Pond Turtle are California species of special concern. Public versions of Pacific Gas and Electric Company (PG&E) Technical Study Summaries for Study TERR 2- Wildlife Resources and Study AQ 10 - Special Status Amphibians and Aquatic Reptiles were provided October 14, 2020 as Attachment E to the Initial Study Report Meeting Summary.

Comment Number	Study (if applicable)	Comment	Response
		Act] NGPA," which this ISR meeting summary is not. 18 C.F.R. subpart K, § 385.1101-.1117. The ISR meeting summary is not a proceeding under the NGPA and so 18 C.F.R. § 385.1112 is an inappropriate basis for confidentiality. 18 C.F.R. § 385.1112 ("a person filing a document under this subpart claims that some or all of the information contained in a document . . . is otherwise exempt by law from public disclosure"). Thus, the Alliance disagrees that the studies are confidential.	
Lake Pillsbury Alliance-4	AQ 6	Furthermore, the Alliance disagrees with the rationale provided for dropping AQ 6 - Lake Pillsbury Fish Habitat. Instead of demonstrating how removing the approved study would meet 18 C.F.R. § 5.15(d), the ISR meeting summary merely states "With the removal of Scott Dam and Lake Pillsbury, the NOI Parties felt there was no longer a need for that study since there wouldn't be a reservoir (or reservoir habitat) under the NOI Parties' proposed Project." It appears that the NOI Parties hope to eliminate this study because they are concerned that the study results will justify maintenance rather than removal of the dam. The above-quoted statement amounts to pre-determination in violation of the law and is conclusory and insufficient to demonstrate why the Federal Energy Regulatory Commission should eliminate the study of fish habitat before the considering the proposal to remove Scott Dam. Indeed, the NOI Parties are studying other resources that would be affected by their proposal to remove Scott Dam. As such, conducting Study AQ 6 - Lake Pillsbury Fish Habitat should be treated the same. The Alliance disagrees with the explanation regarding the removal of the study.	The removal of Scott Dam and Lake Pillsbury is a fundamental component of the proposed Project. Conducting a study on Lake Pillsbury fish habitat when the reservoir will not remain under the proposed Project is not an efficient use of resources. Study AQ 9 - Fish Populations includes sampling the fish populations in Lake Pillsbury, which has more bearing on assessing the potential effects of the proposed Project.
Lake Pillsbury Alliance - 5	SE 1	The Initial Study Report (ISR) meeting summary's proposal to "modify" an unapproved new study entitled, "SE 1—Socioeconomics" fails to meet the criteria under both 18 C.F.R. § 5.15(e), and 5.9.26 Pursuant to 18 C.F.R. § 5.15(e), any proposal for new information gathering or studies must be accompanied by a showing of good cause why the	The NOI Parties identified a need to evaluate potential Socioeconomic effects of the proposed Project during development of the Feasibility Study Report for the Potter Valley Project. On June 28, 2019, the NOI Parties filed with the Federal Energy Regulatory

Comment Number	Study (if applicable)	Comment	Response
		proposal should be approved; and must include a statement explaining "[w]hy the new study request satisfies the study criteria in § 5.9(b)." (Emphasis added). The study criteria in 18 C.F.R. § 5.9(b) compels a showing of several study criteria: … (3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study; (4) Describe existing information concerning the subject of the study proposal, and the need for additional information; (5) Explain any nexus between project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements; (6) Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge; and (7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs. In essence, "[i]n ILP proceedings . . . entities must show that the studies they request meet criteria set forth in the Commission's regulations." See Pub. Util. Dist. No. 1 of Douglas County, Washington (2008) 122 FERC ¶ 61032 (citing 18 C.F.R. § 5.9(b)). As acknowledged by the Federal Energy Regulatory Commission, the bar for new study requests at this stage of the Integrated Licensing Process (ILP) is high.	Commission (FERC) the Notice of Intent to seek a new license for the existing Potter Valley Project. On May 13, 2020, the NOI Parties filed the Feasibility Study Report for the Potter Valley Project, which included proposed study modifications and new studies to address changes to the proposed Project. On July 28, 2020 FERC released Scoping Document 3 which identified socioeconomic resources that could be affected by the proposed Project under its preliminary list of potential environmental issues to be addressed in the Environmental Impact Statement. The proposed Study SE 1 - Socioeconomics is currently structured to meet the needs of Scoping Document 3 and satisfy each of the seven FERC study criteria.
Lake Pillsbury Alliance- 6	SE 1	First, the Initial Study Report (ISR) meeting summary's new study proposal for "SE 1—Socioeconomics" fails to satisfy 18 C.F.R. § 5.15(e). According to the ISR meeting summary, the revisions to the new socioeconomic study would "clarify potential issues related to the removal of Scott Dam and the downstream release of sediments. A revised study description is included in Attachment D. This	As described in the Initial Study Report, the proposed Project, which includes removal of Scott Dam, necessitates new studies as justified under 18 CFR 5.15 (e). The removal of Scott Dam and the associated release of stored sediment from Lake Pillsbury may have effects on downstream riverine ecology and

Comment Number	Study (if applicable)	Comment	Response
		statement is insufficient. In fact, the ISR meeting summary and its Attachment D is completely devoid of the required "statement explaining . . . Why the new study request satisfies the study criteria in § 5.9(b)." The absence of this statement, as required by the ILP regulation, shows a lack of good cause as to why the proposal should be approved. See 18 C.F.R. § 5.15(e). Second, even if the ISR meeting summary includes the statement to explain 18 C.F.R. § 5.15(e)(5), the content of Attachment D does not satisfy 18 C.F.R. § 5.9(b). As noted above, the ILP's procedures test whether a potential applicant has met that obligation. See 18 C.F.R. § 5.15(e)(5) (citing 18 C.F.R. § 5.9(b)). Although the revised new study addressed some of the 18 C.F.R. § 5.9(b) criteria (e.g., goals of the study proposal and level of effort and cost), the NOI Parties' proposal for its revised new study falls short—the revised new study fails to "explain any relevant public interest considerations,"18 C.F.R. § 5.9(b)(3). Exelon Generation Co., LLC (2010; cited on page 7 of the comment letter but reference not included) 132 FERC ¶ 61038 n.12 ("An additional criterion . . . calls for non-agencies to explain the public interest consideration relevant to their requests").	infrastructure. Additionally, the changes to Project infrastructure and operations, may have socioeconomic effects on the communities in the Eel River and Russian River basins. Therefore, the NOI Parties are proposing two new studies in Attachment 3 of their ISR: Study AQ 12- Scott Dam Removal and Study SE 1 - Socioeconomics. Additional revisions to clarify Study SE 1 - Socioeconomics were submitted in the NOI Parties ISR Meeting Summary. Also, please see response to Comment Lake Pillsbury Alliance-5.
Lake Pillsbury Alliance-7	SE 1	Most apparent is the failure to explain relevant public interest considerations, such as non-lakeside property values, in its revised new socioeconomic study. The Integrated Licensing Process (ILP) regulations require explanations that "clearly establish" the connection between the socioeconomic study and the public interest. Here, the revised socioeconomic study seeks to only evaluate "Lakeside property values" even though the extent of the study area includes a much greater area. The term "lakeside" is not defined in the ISR meeting summary and revised new study—and its geographic scope is vague. In an attempt to explain what properties are "lakeside," the NOI Parties provide inconsistent and unclear responses.	Study SE 1 - Socioeconomics currently includes an assessment of potential socioeconomics effects of the proposed Project on property values near Lake Pillsbury (both on Project and non-Project land). The intention of the study is to include all properties that may be directly or indirectly affected by the proposed Project. The radius of the property value assessment will be determined during study implementation using hedonics within the Lake Pillsbury Basin. Additionally, Study SE 1 - Socioeconomics will utilize data collected under Study REC 1 - Recreation Facility Assessment and Study REC 2 - Reservoir Recreation Opportunities

Comment Number	Study (if applicable)	Comment	Response
		The public's interest in the property values impacted by the removal of Scott Dam extend beyond the "lakeside" properties. For instance, non-lakeside property encompasses at a minimum of 1,325 acres of land that is nearby, adjacent to and/or within the the Federal Energy Regulatory Commission project boundary. There are three non-project private residential tracts in the Lake Pillsbury basin, and two are on privately owned lands: Lake Pillsbury Ranch and Rice Fork Homeowners. Lake Pillsbury Ranch is about 1,100 acres, and includes 332 lots, 256 owners, and 25-30 families in full time residence. The Rice Fork Homeowners group is about 225 acres, and has about 30 property owners. The third non-project residential tract is the Lake Pillsbury Homesite Tract (71 cabins) which is located on National Forest Lands and operated under Special Use Permits. The Westshore Campers, a private camping community (80 families), is located within the Project boundary on land that is leased from Pacific Gas and Electric Company (PG&E). Additional non-project recreational facility properties include the Lake Pillsbury Resort & Marina, Soda Creek Store, and several other permitted and privately owned lands, including large ranch properties within the community. The revised new study ignores the broader Lake Pillsbury community. Therefore, the Alliance disagrees with the limited scope of the revised new study included in the ISR meeting summary. Beyond property values, the revised new study does not explain relevant public interest considerations, including lake-based improvements and cultural and aesthetic values. The "public interest cannot be evaluated adequately only by dollars and cents" and considers "non-power resources such as aquatic habitat, fish and wildlife, recreation, and cultural and aesthetic values[.]" Many of the property owners have multi-generational histories that span over 80 years in the project area. A multi-generational community and culture	to assess potential effects of the proposed Project on recreation value. The NOI Parties agree to extend the scope of Study SE 1 - Socioeconomics to include businesses associated with Lake Pillsbury (e.g., Soda Creek Store and Lake Pillsbury Resort).

Comment Number	Study (if applicable)	Comment	Response
		has grown around Lake Pillsbury. Indeed, property owners' lake-based infrastructure (e.g., boat ramps, boat docks, marinas, and other water-related equipment and facilities) could no longer be utilized if Scott Dam is removed. But more importantly, the presence of Lake Pillsbury adds cultural and aesthetic values that is not considered in the revised study plan. The Federal Energy Regulatory Commission should not allow the NOI Parties to advocate for the elimination of the lake as a consequence of a lack of available data considering socioeconomic impacts to the surrounding community. Thus, the Alliance disagrees with the revised new study's exclusion of relevant lake-based improvements and cultural and aesthetic values.	
Lake Pillsbury Alliance-8	SE 1	Specifically, the Alliance takes issue with the revised new study's "Study Methods and Analysis." The revised new study does not explain how the study methods for evaluating "Lakeside property value adjacent to Lake Pillsbury and Lake Mendocino due to elimination of Scott Dam and drainage of Lake Pillsbury" is generally accepted in the scientific community.37 See 18 C.F.R. § 5.15(e)(5) (citing § 5.9(b)); 18 C.F.R. § 5.9(b)(6) ("Any . . . study request must . . . [e]xplain how any proposed study methodology . . . is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant tribal values and knowledge"). Rather, the NOI Parties provide a blanket conclusion that its listed methodologies is generally accepted scientific practice. This conclusory statement is inadequate. Contrary to the ILP regulations, the NOI Parties do not show how the study methods are generally accepted, specifically as it relates to the context of the study's purpose. For example, the NOI Parties propose to evaluate the "lakeside property value" by reviewing "other Potter Valley Project relicensing studies (e.g., Study AQ 1 - Hydrology and Project Operations Modeling) to evaluate change in water surface elevations." There is no explanation as to how reviewing other	Study SE 1 - Socioeconomics will assess potential impacts of the proposed Project on property value adjacent to Lake Pillsbury and Lake Mendocino. Study AQ 1 - Hydrology and Project Operations Modeling will inform an estimate of distance from nearby properties to the future shoreline of the Eel River after Scott Dam is removed and to the water surface elevation in Lake Mendocino under proposed operations. Study SE 1 - Socioeconomics will use a standard hedonic property value modeling approach for considering how property values might change from reduction in elevation and size of a lake or complete lake removal. A hedonic property value analysis is standard practice for evaluating potential effects of dam removal and river restoration (Lewis et. al., 2008). Also, please see response to comments Lake Pillsbury Alliance-7 and Mendocino County Farm Bureau-40.

Comment Number	Study (if applicable)	Comment	Response
		licensing studies may be relevant to a change in water surface elevations and property values of the affected properties specifically affected around the Lake Pillsbury basin. In addition, there is no explanation as to why the study methods are very limited to the property values "adjacent to Lake Pillsbury." Nor is there an explanation as to how the limited the scope of the study would be consistent with the "generally accepted practice in the scientific community." 18 C.F.R. § 5.9(b)(6). A limited study method risks producing limited results relevant to the socioeconomic impacts to the broader community within the Lake Pillsbury basin. The revised proposal provided by the NOI Partners includes a change to the project description to remove the dam. The socio-economic section is "driven" by this proposed change, has not been subjected to a cost benefit analysis considering alternative actions to improve fisheries, and is based on a conclusion that is founded on cherry-picked scientific information. There is an equally or more compelling case based on the best available scientific information that alternative fishery enhancements can be done throughout the Eel River system, e.g., clearing historic blockages to migration caused by flooding, road and rail contraction, enforcement of existing regulations for extraction of water, control of contaminants, improvements to other locations and areas of impact. It ignores facts that ocean conditions have changed impacting overall fish populations and migrations. It only prioritizes one view, one conclusion.	
Lake Pillsbury Alliance-9	SE 1	Finally, the Alliance disagrees with the meeting summary's revised new study's insufficient description of relevant socioeconomic resources. Under 18 C.F.R. § 5.6(d)(3)(xi), a potential applicant "must" include a discussion on socio-economic resources that describes the "general land use patterns (e.g., urban, agricultural, forested), population patterns, and sources of employment in the project	A discussion of land use patterns is one of the requirements for the License Application. The proposed studies and resulting technical reports will not develop all information required for the License Application. Additional information for the License Application will be developed outside of the proposed

Comment Number	Study (if applicable)	Comment	Response
		vicinity." Specifically, the ILP regulations require a discussion on the "scope and level of [socio-economic] resource impacts caused or potentially caused by the proposed project[.]" 18 C.F.R. § 5.6(d)(3)(i)(D). Here, the potential socioeconomic issues do not include general land use patterns within the project area, such as rural residential, rural community, resort, and developed and dispersed recreation. A failure to examine general land use patterns around Lake Pillsbury is inappropriate and inconsistent with the Integrated Licensing Process (ILP) regulations as it fails to take into account resource impacts necessary for its socioeconomic study. As such, the Alliance disagrees that the revised new study sufficiently describes the socioeconomic impacts to the broader rural community within the project area.	studies, including rural residential, rural community, resort, and developed and dispersed recreation.
Lake Pillsbury Alliance-10	SE 1	The Alliance generally agrees with the Study SE 1's goal should be to "evaluate potential socioeconomic effects of Scott Dam removal, including a broader evaluation of potential socioeconomic resource issues." However, the Alliance disagrees with the Initial Study Report (ISR) meeting summary because it does not adequately address relevant potential resource issues that affect the property values beyond the "lakeside," 18 C.F.R. S 5.9(b}(4); and explain the project nexus and the non-lakeside properties, 18 C.F.R.5 5.g(bxs). In addition to the concerns above, the Alliance specifically requests that the revised new "Study SE 1- Socioeconomics" be amended so that it may evaluate the impacts to the broader Lake Pillsbury community In Lake County. The new study needs to include and adequately describe "existing information concerning the subject of the study proposal, and the need for additional information [.1" 18 C.F.R. I 5.9(bX4). As such, the Alliance includes existing information that the geographic scope of the "local economy should encompass an area extending at least 50 miles from cabins permitted by U.S. Forest Service. The revised study should apply the same geographic	Please see response to Comment Lake Pillsbury Alliance-7.

Comment Number	Study (if applicable)	Comment	Response
		scope to include information on all recreational users and properties to gain more information on non-lakeside properties. Accordingly, the study should evaluate the direct and indirect impacts to non-lakeside properties and facilities.	
Anderson, Bob - 1	AQ 7	Redesign the diversion to times when there is a surplus in the Eel River and then use a new modern method to divert it from under the bed of a constructed side channel. In a modified Study Plan, I would add to AQ-7 relocating the existing diversion tunnel upstream to just below the Eel River Road bridge. Place a weir upstream of the bridge: (an example from Australia). Think of it operating like a simple beaver dam, with the weir creating a pool or backwater and, when it fills, any water not diverted simply exits over the top and continues its way to the ocean. • Include a permanently installed notch in the weir so any flow below a certain threshold, say 20 cubic feet per second (cfs), can pass freely and remain in the river. • Add a side channel delivering water to the other side of the bridge. The side channel's opening upstream of the weir would be designed to limit flows entering to 325 cfs or less. For fish passage, the first 25 cfs would be returned to the river just below the bridge and, when available, 300 cfs for diversion. • The relocated opening to the diversion tunnel would be positioned beneath an infiltration gallery filled with rocks and boulders and constructed to allow water to flow into the tunnel by gravity but effectively returning any fish to the river. This option is preferable to spending millions of dollars to modernize the fish screens and fish ladder at Cape Horn Dam knowing that any improvements to those facilities would still be at risk from the release	The NOI Parties appreciate the thoughtful explanation of a potential alternative solution for Cape Horn Dam fish passage. Study AQ 7 - Fish Passage includes establishing a Fish Passage Technical Working Group composed of stakeholders knowledgeable in issues related to fish passage, including participants representing agencies (e.g., National Marine Fisheries Service, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service) and tribes, in addition to expert scientists and engineers. The NOI Parties will evaluate improved upstream and downstream fish passage alternatives (including conceptual designs, costs, and estimated efficacy) at Cape Horn Dam in collaboration with the fish passage technical working group. Also, please see response to Comment U.S. Fish and Wildlife Service-2.

Comment Number	Study (if applicable)	Comment	Response
		of sediment once Scott Dam is removed. Utilizing natural materials, this design can be easily maintained and reduces on going operational and maintenance costs of the project.	
Bock, Louis - 1	general	I write regarding the evolution of the plans for the EEL River Watershed and the two dams. I have been using Redwood Valley Irrigation district water for almost 40 years in my vineyard. It has proved to be the factor of my survival as a grape grower and my success in the wine business. I have watched the events transpire and they seem to me to be much like our current national politics. Fractured and not holistic. It seems that we have positive attributes with the dams in place and still have scientific needs of the river's restoration for the use of fish especially, and the public in general. I just received notice that today was the day to file any thoughts on positions and potential resolution of the issues outstanding. So, my thinking goes that in order to do the least harm, we should move slowly and see how we can maintain the flow through Potter Valley into Lake Mendocino. Besides keeping the many farms in Potter Valley supplied with water, and the same to Redwood Valley and points South, we must creatively work to protect EEL river habitat. The Pillsbury Dam allows for cold water to be released in the summer to the benefit of the Salmonid population. In addition at far less cost than the destruction of the two dams, adaptations can be made to further the better management of water and the habitat around the river. Obviously we have many mouths to feed here, and while I am an avid conservationist, I know that we have a thriving population of people who depend on the water to survive. With the Pike Minnow now in Lake Pillsbury and below, it does not seem that opening the water flow by removing the dams would be beneficial to the ongoing need to protect Salmon and Steelhead. Can we not work first on cleaning out the entrances to the various tributaries and manage the flow more for fish health while looking for more creative methods than simply removing the dams. We have valuable constructions that	The NOI Parties are committed to the shared objectives for a Two-Basin Solution, which include (1) minimizing or avoiding adverse impacts to water supply reliability, fisheries, water quality, and recreation in both basins; (2) improving fish passage and habitat on the Eel River sufficient to support recovery of native anadromous fish populations, including passage at existing dam locations; (3) reliance on best available science and engineering analyses to evaluate options for restoration, water delivery, and hydroelectric generation under a new license; (4) collaboration on funding; (5) active participation of tribes and other stakeholders supportive of the Shared Objectives; (6) economic welfare of both basins; (7) continued hydroelectric generation; and (8) protecting tribal cultural, economic, and other interests in both basins. The NOI Parties believe these shared objectives support the communities and environments of both the Eel and Russian and river basins.

Comment Number	Study (if applicable)	Comment	Response
		only manage a small part of the water in the Eel. Let's manage them for the overall benefit of involved.	
Gaytan, Salvador - 1	general	I STRONGLY AM AGAINST THIS.... WE THE PEOPLE IN LAKE COUNTY DESERVE TO HAVE A SAY IN THIS MATTER, WE ARE APART OF THIS, ITS NOTJUST UNFAIR ITS AND INJUSTICE TO EVERYONE IN LAKE COUNTY, IT SEEMS THAT EVERYONE THINKS THAT LAKE COUNTY IS A LOST CAUSE, AND THAT ITS PEOPLE DONT CARE, BUT THAT HAS CHANGE LAKE COUNTY HAS SLOWLY BEING FIGHTING TO BE BETTER PLACE, BUT WE ARE OFFENT LEFT OUT OR GIVEN THE SHORT END OF THE STICK HOW CAN WE BETTER OURSELF, OUR PEOPLE, OUR TOWNS....ITS NOT OK TO TAKE AWAY OUR RIGHT TO BE THEREAND GIVE IT TO OTHER COUNTIES THAT ARE ALREADY ON THE RIGHT PATH TO BEING BETTER.... SAD TO SAY BUT GREED IS WHAT DRIVES PEOPLE NOW A DAYS, AND THAT IS WHY THE WORLD IS THE WAY IT IS....AGAIN I AS A LAKE COUNTY RESDIENT AM AGAINST THIS....	Please see response to Comment County of Lake-1.
Karnowski, Ellen-1	AQ 7	I think providing fish movement or passage up and down the streams will cost less than decommissioning Scott Dam. Providing mitigating measures instead is what I would like to urge you to follow.	Please see response to Comment Rep. J. Garamendi-1.
Karnowski, Ellen-2	LAND 3	I recommend these measures due to the fact that the Lake Pillsbury reservoir has been established in Lake County since 1922 and provides firefighting emergency water sources. These are critical issues and have not been addressed in the current proposal.	Please see response to Comment Rep. J. Garamendi-4.
Karnowski, Ellen-3	SE 1	Excluding Lake County from the process is intentionally hurting the Lake County residents of Lake Pillsbury and they are the ones who are most affected. The practice of no consideration of one-third of the acreage within this project's boundary is not acceptable.	Please see response to Comment County of Lake-1.

Comment Number	Study (if applicable)	Comment	Response
Whipple, Jonathan-1	SE 1 & LAND 3	If one is going to study impacts downstream, one must include the Russian River Communities, which have been downstream for a heckuva long time, long enough to have established ways of life dependent on reliable water supplies. These and presumed water rights and wildfire fighting resources will all likely be jeopardized if Scott Dam is removed. Please gather data on the impacts on us, and include our representatives in working groups. This might avoid a bunch of headaches later.	Study AQ 1 - Hydrology and Project Operations Modeling will assess the effects of the proposed Project on water supply availability to the Russian River. Study SE 1 - Socioeconomics will assess the potential socioeconomic effects of the proposed Project on communities along the Russian River. Study LAND 3 - Hazardous Fuels Reduction Assessment will assess the potential effects of the proposed Project on the ability to prevent, control, and suppress wildfires. Also, please see response to comments U.S. Forest Service-9, U.S. Forest Service-10, U.S. Forest Service-11, and Sonoma County Farm Bureau-1.
Williams, Jeff-1	General	It is heartening to see the great news about Pebble Mine and the Klamath Dams and it is also a reminder of just how much work remains to be done to protect and restore our anadromous fisheries. As a native northern Californian who grew up with the Sacramento River in my backyard, I've had the privilege to enjoy the beauty and serenity of our northern rivers and lakes for over half a century. Sadly, in that time I've seen the toll that environmental abuses and climate change have taken on our natural environments. Among the many amazing California rivers that have long suffered from environmental degradation and the negative effects of dams, the Eel River seems a prime candidate for the next big removal project. Historically, the Eel supported enormous runs of at least five distinct salmonid populations. Conservative estimates (based on harvest data) put the size of Chinook run range from 100K to as much as 800K in peak years during the late 1800s. Salmon and steelhead populations declined significantly into the 20th century but were still relatively robust considering that Chinook and steelhead runs were estimated to average around 50K to 80K respectively in the mid-	Thank you for your comment.

Comment Number	Study (if applicable)	Comment	Response
		1960s. Fast forward to 2019 and those numbers have declined to the low thousands (even below 1,000 in 2012). Unfortunately, there is no silver bullet to restoring these historic runs. Factors such as habitat degradation from logging and grazing, water diversions for agriculture, invasive pike minnows, and climate change have all impacted the fishery. The exact degree to which the Scott and Cape Horn dams have impacted the Eel fishery is not completely understood. Furthermore, dam removal and improved fish passage for the Eel should not be viewed as a panacea. Regardless, removal is a key component of what will be a multi-faceted effort to restore the Eel salmonids to levels that are sustainable. Please expedite the removal of Scott Dam and the restoration of the Eel River watershed before we lose these magnificent salmonids from this system forever.	

List of References

FitzGerald, A, D. Boughton, J. Fuller, S. John, B. Martin, l. Harrison, and N. Mantua. 2020. Thermal and habitat suitability for anadromous salmonids in the dammed and inaccessible Upper Mainstem Eel River subbasin in the Eel River Basin, California. Southwest Fisheries Science Center, NOAA NMFS. Santa Cruz, California.

Lewis, L.Y., C. Bohlen, and S. Wilson. 2008. Dams, Dam Removal, and River Restoration: A Hedonic Property Value Analysis. Contemporary Economic Policy. 26[2]. April.

Lisle, Thomas E. 1990. The Eel River, northwestern California; high sediment yields from a dynamic landscape. In: M.G. Wolman and H.C. Riggs (ed.), Surface Water Hydrology, v. O-1, The Geology of North America, Geological Society of America. p. 311-314.

NMFS (National Marine Fisheries Service). 2008. Biological Opinion. Water supply, flood control operations, and channel maintenance conducted by the U.S. Army Corps of Engineers, the Sonoma County Water Agency, and the Mendocino County Russian River Flood Control and Water Conservation Improvement District in the Russian River watershed. PCTS Tracking Number: F/SWR/2006/07316. National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Southwest Region, PCTS: 2006/07316, Santa Rosa, California.

NMFS. 2014. Final Recovery Plan for the Southern Oregon/Northern California Coast Evolutionarily Significant Unit of Coho Salmon (Oncorhynchus kisutch). National Marine Fisheries Service. Arcata, California.

PG&E (Pacific Gas and Electric Service). 2018. Potter Valley Project, FERC No. 77, Revised Study Plan. January.

PG&E. 2020. Draft Article 52(b) Annual Performance Report, 2019. Pacific Gas and Electric Company, Potter Valley Project FERC Project No. 77.

Thorsteinson, Lyman; VanderKooi, Scott; and Duffy, Walter. 2011. Proceedings of the Klamath Basin Science Conference, Medford, Oregon, February 1–5, 2010: U.S. Geological Survey Open-File Report 2011-1196, 312p. *Full reference was not provided by the commenter.*

This Page Intentionally Left Blank

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 14th day of December, 2020.

/s/ Mealear Tauch
Mealear Tauch
Van Ness Feldman, LLP
1050 Thomas Jefferson Street, NW
Washington, DC 20007
(202) 298-1800
mzt@vnf.com

Document Content(s)