

Todd Lands, Cloverdale, CA.

City of Cloverdale Scoping Questions for the Federal Energy Regulatory Commission

The City Council of the City of Cloverdale respectfully submits the following scoping questions regarding PG&E's application to surrender the Potter Valley Project. The City has a direct and substantial interest in the continued reliability of the Russian River water supply, the economic vitality of northern Sonoma County, public safety, environmental stewardship, and the long-term resilience of our community.

The City requests that FERC prepare a comprehensive Environmental Impact Statement that fully evaluates all reasonably foreseeable environmental, economic, public safety, water supply, and community impacts before any decision is made.

Given the regional importance of the Potter Valley Project, the City believes the National Environmental Policy Act requires a rigorous evaluation of reasonable alternatives, cumulative impacts, mitigation measures, and long-term public interest considerations.

- How will FERC evaluate impacts on the City of Cloverdale's long-term municipal water supply reliability?
- How will reduced Russian River flows affect Cloverdale residents during extended droughts?
- What impacts could the proposed surrender have on future residential and commercial development within the City?
- How will FERC evaluate impacts on the City's emergency water supply during wildfire, drought, or other disasters?
- Will FERC analyze the financial impacts on Cloverdale ratepayers if replacement of water supplies become necessary?
- How will the surrender affect the City's ability to comply with state housing mandates that depend upon reliable long-term water supplies?

The economic impacts to the City of Cloverdale should be strongly considered:

- What impacts will reduced water reliability have on Cloverdale's local economy?
- Will FERC evaluate impacts on wineries, agriculture, tourism, restaurants, small businesses, and employers?
- How will reduced water certainty affect future investment within northern Sonoma County?
- Will FERC analyze impacts on property values resulting from diminished long-term water reliability?
- Will FERC evaluate fiscal impacts on local governments?

Public safety is of utmost importance to the City of Cloverdale.

- How will removal of Lake Pillsbury affect regional wildfire response?
- What emergency water storage will replace the reservoir? And can it be built in a timely manner?
- How will FERC evaluate emergency response planning if replacement facilities fail?
- Will emergency management agencies be consulted?

The City of Cloverdale is asking FERC to consider:

- How will FERC coordinate with cities that depend upon Russian River water?
- How will local governments participate in developing mitigation measures?
- Will FERC consult with Sonoma County cities regarding General Plans and future water demands?
- How will FERC incorporate local land use planning into the NEPA analysis?

The City of Cloverdale needs growth and development to be successful. But without water reliability, it will be difficult for even the current community to survive.

- How will reduced water reliability affect Cloverdale's ability to meet Regional Housing Needs Allocation (RHNA) obligations?
- Will FERC evaluate impacts on future housing construction?

The City of Cloverdale is hoping FERC will consider all alternatives:

- Will FERC evaluate alternatives that preserve Lake Pillsbury while improving fish passage and maintaining water supply reliability for Russian River communities?
- Will FERC evaluate federal ownership, public ownership, or transfer to another qualified operator?
- Will FERC evaluate phased improvements rather than permanent loss of storage?
- Will FERC evaluate the dams remaining in place as flood control and storage vs. hydropower?

The City of Cloverdale is requesting honest and transparent information regarding the seismic status of the dams, as all information provided to date state, they are seismically safe.

The City requests that FERC independently evaluate whether any identified seismic risks can be mitigated through engineering improvements rather than permanent loss of one of Northern California's most important water storage facilities.

The City of Cloverdale respectfully requests that FERC fully evaluate whether removal of Scott Dam and surrender of the Potter Valley Project are consistent with the Federal Power Act's public interest requirements when balanced against the long-term municipal water supply, drought resilience, economic vitality, public safety, wildfire preparedness, environmental stewardship, and future growth needs of Russian River communities.

Before approving surrender, how will FERC determine that all reasonable alternatives capable of preserving Lake Pillsbury's significant public benefits have been fully analyzed and shown to be infeasible?

Given California's increasing water shortages and the substantial public investment that would be required to replace existing storage, will FERC evaluate whether continued operation, rehabilitation, public ownership, or federal ownership of the Potter Valley Project better serves the long-term public interest than dam removal?