



NORTHERN CALIFORNIA
COUNCIL

FLY FISHERS
INTERNATIONAL

July 23, 2026

Re: COMMENTS on Scoping Document 1 for the proposed surrender and decommissioning of the Potter Valley Hydroelectric Project, P-77-332

Via Electronic Filing

Hon. Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington D.C. 20426

Dear Ms. Reese,

The Northern California Council, Fly Fishers International (NCCFFI) provides the following comments on Scoping document 1(SD1) for Pacific Gas and Electric (PG&E)'s proposed license surrender and decommissioning of the Potter Valley Hydroelectric Project, P-77-332 (PVP) to the Federal Energy Regulatory Commission (FERC/The Commission). NCCFFI supports SD1's description of the applicant's proposed action, including license surrender and removal of Scott Dam and Cape Horn Dam on the upper mainstem of the Eel River. We also supports the Commission's parallel consideration of a reasonable range of alternatives to the proposed action.

Impacts to the Fly Fishing Community

The NCCFFI is a regional organization in Northern California, and one of 17 total Councils in the U.S. connected to our parent organization, Fly Fishers International. Our geography starts in Fresno in the south and runs to the Oregon border in the north, and from the Pacific Ocean to the west through central Nevada to the east. We have 27 affiliated fly fishing clubs in this region, with more than 10,000 members. The majority of our members fish the rivers of Northern California, and the Eel River has

historically been a primary focus in the Fall and Winter resulting from the historical populations of Chinook & Coho salmon and Steelhead. The Eel River was once the second most visited anadromous fish river our members visited, behind only the Klamath River. What our members have watched since Scott and Cape Horn dams were built is a continual decline in fish populations. These reduced populations changed a “great fishery” to a “maybe fishery”, with only a small population of fly fishers going there today. Most no longer fish for salmon due to closed seasons or near zero populations. Steelhead, which are sometimes available, and some “old timers” still go today. Most of the younger club members have never fished the Eel River because the likelihood of catching a fish is “slim”. We have advocated for removal of these dams for many years, even before PG&E decided to surrender its license to operate the PVP. We are fully in support of FERC accepting the license surrender and decommissioning of both Scott and Cape Horn Dams, and fully support the 2025 Water Diversion Agreement for a New Russian-Eel Facility (WDA), which PG&E’s proposed action would facilitate, and all members of The Two Basin Agreement have signed.

NO ACTION ALTERNATIVE

In our view, the Commission is correct to dismiss the no-action alternative as unreasonable. PG&E has determined the project is uneconomic to operate. It is our understanding that the PVP has been the worst performing asset in its class of generation assets with operational and maintenance costs exceeding revenues from power production many times over. (See March 22, 2023 PG&E letter to FERC, Potter Valley Hydroelectric Project, FERC No. 77) The only remaining asset of the PVP is the diversion of water to the East Branch Russian River, which is scheduled to be continued after dam removal. Lastly, the no-action alternative would require PG&E to obtain a new license for the PVP. However, under FERC’s regulations, PG&E may not obtain a new license for the PVP, since it failed to complete the relicensing application it began in 2017. Hence, PG&E must complete the license surrender process.

Of great importance in this case, the no action alternative no-action alternative is impracticable because the current project configuration and operations have caused and continue to cause serious harm to Chinook salmon and steelhead, both of which are listed under the federal Endangered Species Act. Thus, it is important to the fisheries that PG&E

be allowed to move forward with dam removal as soon as possible. Removal of Scott and Cape Horn dams is the most reasonable and feasible way to restore passage of Chinook salmon and steelhead into the upper reaches of the mainstem Eel River basin, allowing access to the best spawning and rearing habitat in the eel River. These two dams have blocked passage since they were installed, with the populations of both species now only a small fraction of their historical populations. Additional benefit from dam removal will be greatly improved water quality, including colder water temperatures in the river below the location of the dams, as the presence of Lake Pillsbury will no longer negatively influence water quality in the river.

Surrender and Decommissioning (Dam Removal) without NERF

On this issue, we are in complete agreement with other groups submitting comments - Friends of the Eel River, California Sportfishing Protection Alliance, Native Fish Society, Northern California Association of River Guides, and Redwood Chapter of the Sierra Club - we disagree with the SD1's proposal to eliminate an alternative that would provide for surrender & decommissioning without "PG&E's non-project use of project lands proposal of ERPA's (Eel Russian Project Authority) construction of the NERF (New Eel Russian Facility). We do not object to construction of the NERF, and understand why doing it at the same time the dams are removed might seem appropriate. However, we are concerned that the PG&E proposal includes NERF construction as an inseparable element of its dam removal proposal. The ERPA's involvement with NERF creates permitting and NEPA analysis complications, which complicates the process. Hence, we agree with others that it would be more effective, logical, and appropriate for the Commission to consider NERF construction in its own NEPA process, distinct from license surrender & dam removal. It appears to us that the NERF is not certain of construction due to many complications and outside interests. Due to the challenges the NERF has to consider, we feel it best the facility move forward independently from dam removal. It is also our position that Eel River dam removal must not be contingent on construction of the NERF or the approval by ERPA. Making dam removal contingent on the NERF complicates the decision on when decommissioning and dam removal will happen. What is best for PG&E,

their ratepayers, as well as the natural resources of the river and its watershed is to move forward now with the Decommissioning decision.

An issue of concern for us in SD1 is the dismissal of the no NERF dam removal alternative. In SD1 the stated reason for dismissal is that a no NERF alternative eliminates the existing infrastructure necessary for future diversions to the East Branch of the Russian River. Factually, PG&E has not proposed to remove the tunnel that allows water transfers to the Russian River. What PG&E has represented is: if NERF were not constructed, the company would cap the tunnel rather than remove it. Hence, the tunnel and important infrastructure would still exist and be useable for future diversions to the Russian River. It is not true that “any future diversions to the East Branch of the Russian River” would be precluded by dam removal without construction of NERF.

Also of concern for us in SD1 & dismissal of the alternative of dam removal without NERF relates to the concern that dam removal would block the ability for PG&E to divert water to PVID, via the use of the PG&E’s water right. That said, when the license is surrendered and Lake Pillsbury is gone, the water contract with PVID will terminate. This agreement functions under a water right held by PG&E, and we believe that the Federal Power Act grants FERC no jurisdiction over water rights. That is for the state of California to manage. Hence, if PVID and others in ERPA want to continue the diversion to the Russian River, they would need to reach agreement with the state Water Board.

Long Term Concerns and Opportunities

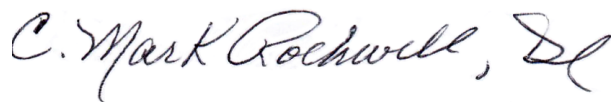
It is our observation that returning the Eel River to its historical conditions (no dams) is an opportunity to “Make It Right!” again. There is no question that the dams and their impacts have drastically reduced the historically significant fisheries that once occupied the river and its tributaries. Historical population numbers for the Eel show it to be the 4th most productive salmon river in the Pacific Northwest, and third most productive in California (<https://scc.ca.gov/2016/05/13/exciting-projects-on-the-eel-river-north-coast-coastalact40/>). What that meant to small town jobs along the northern California coast was everything, especially when you combine this fishery with Klamath River Salmon, and fish from other streams in the region. The Northern California coast was a bustling place as a result of a healthy salmon fishery. All that changed when the dams were built on the Eel &

Klamath rivers and the fisheries collapsed. The drop in both commercial and recreational fishing resulted in a significant economic negative impact that is still being felt today.

A significant milestone took place in October, 2024, when salmon were once again allowed to move upstream beyond the locations of the 4 dams that blocked fish passage for more than 100 years. The two years since the dams were removed has seen salmon returning to their historical spawning and rearing habitats in Oregon. It demonstrates that if we give the fish a chance, they will find their way to historical watersheds, and begin building stable and self sustaining populations, which can easily lead to stability for them, and removal from the Endangered Species Act (ESA) listing. All signs are showing that increased numbers of naturally spawning salmon will again populate the Klamath and the ocean along the Northern California coast.

We now have a chance to open the spawning & rearing door to the upper watersheds of the Eel River, and allow the Eel River fishery an opportunity to return to its historic greatness. This is truly an historic opportunity - for the fish, for Tribes, and for the economic viability of coastal towns, and the people who live there. We appreciate the Commission's careful consideration of the complex issues this project presents, and we ask that the Commission approve PG&E's request for license surrender and allow dam removal to move forward as soon as possible.

Sincerely yours,



Dr. C. Mark Rockwell, Board member and V.P. Conservation
Northern California Council, Fly Fishers International