



September 18, 2026

Debbie-Anne A. Reese, Secretary,
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Subject: Comments on NEPA Scoping for Potter Valley Project (P-77-332)

Dear Secretary Reese,

On behalf of the undersigned organizations, this letter expresses our support for an efficient and safe decommissioning of the Potter Valley project and removal of Scott and Cape Horn Dams. We are grateful to the Federal Energy Regulatory Commission for the timely initiation of this NEPA process. The wild salmon, steelhead, and lamprey runs of the Eel River need the dams to be removed as soon as possible and comprehensive restoration to be completed to ensure these runs are viable into the future.

The Eel River and the fisheries it supports are of utmost importance to regional Tribes. The 3,600-square mile Eel River watershed is used for tribal cultural and ceremonial purposes; therefore, restoring it should be a priority for PG&E and state and federal agencies.

During the decommissioning and removal process, PG&E should consult with interested Tribes early and often and protect cultural sites and resources that will be affected by the removal of the Dams and subsequent restoration projects.

Dam removal is paramount to the state in completing our 30x30 goal. With the hefty charge of conserving 30% of land and coastal waters by the year 2030, California has less than five years to protect almost 4 million acres of land and 283,000 acres of coastal waters. California does not have a clear method for quantifying freshwater conservation, however, implementing watershed-scale restoration projects that reconnect fish passage to conserved lands, such as those in Mendocino National Forest is an important pathway to 30x30¹². Additionally, the state has prioritized the removal of unnecessary and obsolete waterway barriers, such as the Eel River dams, as a priority action for restoring degraded waterways under the State's Salmon Strategy³.

The Scoping Document states that keeping dams is not an option, and we agree. In order to reap the full benefits of ecosystem and species restoration, dam removal must be authorized quickly. The Eel River still hosts native runs of summer-run steelhead, in addition to the now dominant winter runs. The National Marine Fisheries Service (NMFS) has to date listed winter and summer steelhead together in the Eel River as Northern California steelhead. The state of California, however, has recognized Northern California Summer Steelhead as distinct from winter-run steelhead, listing them as Endangered under the California Endangered Species Act⁴. We urge the Federal Energy Regulatory Commission to recognize the significance of the Project for the recovery, not only for salmonids generally and steelhead in particular, but especially for what was the southernmost run of summer steelhead on earth until Scott Dam was built. As Kannry et. al. have demonstrated, rainbow trout populations above Scott Dam still retain the genetic capacity for both anadromy and for the summer steelhead life history⁵. Thus, a likely result of removal of the project dams will be the restoration and recovery of a population of extraordinary significance that is now functionally extinct.

PG&E's application for dam removal includes a collaborative solution for continued water supply for the Russian River that we support, as it is also protective of habitat in the Eel River. We also believe that there should be a "no NERF alternative" in the analysis so that dam removal is not delayed by any issues with the construction of the New Eel-Russian Facility (NERF). This is a

¹ Pathway 6.6 under "Restore degraded landscapes, waterways, and priority habitats" in [Final Pathways to 30x30](#) guiding document

² Pathway 10.12 under "Invest in long-term monitoring, adaptive management, and stewardship" in [Final Pathways to 30x30](#) guiding document

³ California Department of Fish and Wildlife. 2024. California Salmon Strategy for a Hotter, Drier Future: Restoring Aquatic Ecosystems in the Age of Climate Change. Sacramento, CA.

Retrieved from:

<https://www.gov.ca.gov/wp-content/uploads/2024/01/Salmon-Strategy-for-a-Hotter-Drier-Future.pdf>

⁴ See California Natural Diversity Database (CNDDB). October 2025. State and Federally Listed Endangered and Threatened Animals of California. California Department of Fish and Wildlife. Sacramento, CA. p 9. pdf at <http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline>

⁵ Kannry, Samantha H., Sean M. O'Rourke, Suzanne J. Kelson, and Michael R. Miller, On the Ecology and Distribution of Steelhead (*Oncorhynchus mykiss*) in California's Eel River, Journal of Heredity, 2020, 548–563, doi:10.1093/jhered/esaa043



core principle of the collaborative agreement for continued water diversions after the dams are removed⁶.

PG&E is making a private business decision to remove these dams because they no longer generate electricity and have been uneconomical for years. The Eel River dams need to be removed as soon as possible to reduce costs to ratepayers, mitigate safety and maintenance issues, and provide relief from on-going ecosystem harms. The plan presented serves the public interest by supporting holistic river stewardship, enhancing fish passage, rebuilding habitat, and addressing long-standing Tribal, ecological, and economic issues.

Thank you for the opportunity to comment on the NEPA Scoping Document for the Potter Valley Project (P-77-332). Please see the list of organizations signed on from the Power in Nature coalition. Power in Nature is a statewide coalition of over 500 community groups, environmental and conservation organizations, land trusts, tribal nations, Indigenous organizations, and Tribal members dedicated to advancing California's 30x30 commitment. The Power In Nature coalition has identified nearly 100 potential 30x30 projects across the state and works on a broad range of issues, including biodiversity protection, climate resilience, equity, recreation, outdoor access, and social justice. For more information, visit PowerInNature.org.

Sincerely,

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⁶ MEMORANDUM OF UNDERSTANDING TO ADVANCE A WATER DIVERSION AGREEMENT FOR A NEW EEL-RUSSIAN FACILITY. February 7, 2025.
<https://eelriver.org/wp-content/uploads/2025/02/Attachment-2-Draft-Memorandum-of-Understanding-for-Water-Diversion-Agreement-2-7-2025.pdf>



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