TRIBAL BENEFICIAL USES OF THE EEL RIVER:

Survey Findings from Indigenous Community Members

Prepared by: Revitalizing Opportunities for the Alderpoint Region (ROAR)
A Fiscally Sponsored Project of Community Initiatives.
Prepared for: The Federal Energy Regulatory Commission (FERC)
Public Comment Scoping Proceedings | Project No. 77-332
(Potter Valley Hydroelectric Project Surrender and Decommissioning), June 2026.
Funding Acknowledgments: Survey data collection was made possible via the State Coastal Conservancy's Great Redwood Trail earmarked funding: ROAR added 'Tribal Beneficial Use'-specific survey questions within a larger survey designed to gather cultural resource preservation and art/design recommendations from tribal communities connected to the Great Redwood Trail's Alderpoint segement.

These findings are based on in-depth responses from 38 Tribal community members, descendants, and cultural knowledge holders. Thank you to Nikcole Whipple, an independent contractor of Save California Salmon for her guidance in designing the TBU survey questions.

EXECUTIVE SUMMARY

Purpose

This report summarizes findings from a 2026 survey conducted with Wailaki/Kinest'e and other Eel River Tribal community members as part of a broader Cultural Resource Study for the Alderpoint segment of the Great Redwood Trail. This report covers Tribal Beneficial Uses (TBU) of the Eel River and is one component of the larger study.

Tribal Beneficial Uses are the cultural, spiritual, subsistence, educational, ecological, and community relationships Tribal people maintain with rivers, streams, fisheries, plants, wildlife, and watersheds. The survey documents these relationships to support ongoing Tribal Beneficial Use recognition efforts, watershed restoration planning, fisheries recovery, and water quality protection within the Eel River watershed. A total of 38 survey responses were received as of June 2026.

Key Findings

The survey documents ongoing Tribal relationships with the Eel River that remain active today. Participants described deep connections to the river through:

- Fishing and traditional foods
- Gathering culturally important plants
- Teaching youth
- Ceremony and prayer
- Visiting ancestral places
- Traditional ecological knowledge
- Family activities along the river
- Cultural identity and belonging

The findings demonstrate that Tribal Beneficial Uses are not simply historical activities. Respondents described present-day uses, ongoing cultural responsibilities, and strong desires to maintain and strengthen relationships with the river for future generations.

River Health Directly Affects Tribal Practices

Participants consistently reported that declining ecological conditions have affected their ability to carry out cultural and subsistence practices. Common concerns included:

- Declining salmon runs
- Reduced river flows
- Water quality concerns
- Algae blooms
- Loss of access to traditional gathering areas
- Changes to culturally important plants and habitats

Many respondents indicated that they would increase participation in fishing, gathering, cultural education, and other traditional activities if river conditions improved.

Clean Water Supports Cultural Continuity

Survey responses repeatedly identified clean water as essential to Tribal life. Participants described clean water as necessary for fish harvesting, gathering plants, cultural education, ceremony and prayer, family use of the river, and maintaining cultural identity. These findings support the principle that water quality protections should consider cultural uses of the river in addition to recreational, agricultural, municipal, and industrial uses.

Salmon Recovery Supports Cultural Recovery

Survey participants consistently linked salmon to culture, identity, family traditions, education, and food systems. Respondents described salmon as more than a resource; they are part of broader relationships connecting people, water, wildlife, plants, and place. The findings show that restoring salmon runs directly supports family traditions, passing down knowledge, and household food security.

Relationship to Current Eel River Restoration Efforts

These findings are directly relevant to current discussions regarding the removal of Scott Dam and Cape Horn Dam through the Potter Valley Project decommissioning process. Current Federal Energy Regulatory Commission (FERC) proceedings recognize dam removal as the primary path forward for restoring fisheries and ecosystem function within the Eel River watershed. Survey participants repeatedly identified values that align with restoration goals, including healthy salmon populations, clean water, access to traditional gathering areas, protection of culturally important plants, opportunities to teach youth, and long-term stewardship of the river.

Primary Recommendations

Based on survey findings, this report recommends:

1. Recognize Tribal Beneficial Uses as living, ongoing practices requiring present-day protection.
2. Protect water quality standards necessary to support cultural uses of the river.
3. Support restoration actions that improve Tribal access to traditional practices.
4. Include Tribal knowledge holders throughout water quality planning and restoration efforts.
5. Recognize salmon recovery as both an ecological and cultural objective.
6. Incorporate Tribal Beneficial Uses throughout Potter Valley Project restoration planning and implementation.
7. Advance formal recognition of Tribal Beneficial Uses within water quality planning and regulatory processes.

Conclusion

The survey documents substantial evidence of ongoing Tribal Beneficial Uses associated with the Eel River. Participants described active cultural, educational, spiritual, ecological, subsistence, and family relationships with the river that continue today. They also identified ways that declining ecological conditions have affected those relationships and described how restoration of river health could strengthen cultural practices for future generations. Taken together, these findings support continued efforts to recognize, protect, and restore Tribal Beneficial Uses throughout the Eel River watershed.

1. OVERVIEW OF THE TBU REGULATORY PROCESS

Water regulation in California operates on two levels: the State Water Resources Control Board (State Board) sets broad policy, and nine Regional Water Quality Control Boards manage specific watersheds. The Main Stem Eel River falls under the jurisdiction of the North Coast Regional Water Quality Control Board (Region 1).

Each Regional Board maintains a Basin Plan that establishes water quality standards. The plan lists rivers and defines their Beneficial Uses—the legally recognized ways people, plants, and wildlife use the water (e.g., drinking, agriculture, or fish habitat).

In 2017, the State Board established statewide definitions for Tribal Beneficial Uses (TBUs) to protect tribal relationships with water:

- **Tribal Tradition and Culture (T-CUL):** Protects water quality needed to support cultural, spiritual, ceremonial, or traditional rights and lifeways, including plant gathering.
- **Tribal Subsistence Fishing (T-SUB):** Protects water quality needed to support the non-commercial catching or gathering of fish, eels, and shellfish for consumption by tribal families to meet nutritional needs.

How a River Gets Designated

Designation requires a Basin Plan Amendment by the North Coast Regional Board. This public legal process involves:

1. Written request and consent from a local Tribe.
2. Tribal consultation and environmental review under the California Environmental Quality Act (CEQA).
3. Public comment periods and hearings.
4. Final approval by the State Water Board and the Office of Administrative Law (OAL).

Once designated, the Regional Board must protect these uses when reviewing water rights, logging or construction permits, or enforcement actions.

Current Relevance

The State Water Board has released its Draft Guidance on Designating Tribal Beneficial Uses for public review, with a comment deadline of August 31, 2026. Data from this survey provides evidence directly relevant to this process.

2. GEOGRAPHIC SCOPE AND SURVEY INTENT

The survey was distributed to tribal members and descendants with heritage along the Main Stem Eel River, primarily from Alderpoint to Dos Rios, as well as the wider watershed. While the broader study focuses on the Alderpoint trail corridor, the TBU questions were broader because water quality protections must apply to the entire river system to be effective downstream.

The Main Stem Eel River corridor. Survey respondents emphasize that water quality protections must safeguard the entire river system to support downstream cultural uses.

3. METHODOLOGY

Survey Purpose

The 2026 Wailaki/Kinest'e and Eel River Tribal Community Survey was developed as part of a broader Cultural Resource Study for the Alderpoint segment of the Great Redwood Trail, with a “Tribal Beneficial Uses of the Eel River” subsection added under the guidance of Nikcole Whipple, Round Valley Tribal member and Save California Salmon staff member. The survey was designed to gather Tribal perspectives regarding cultural resources, traditional ecological knowledge, culturally significant places, stewardship priorities, and Tribal Beneficial Uses of the Eel River.

This report focuses specifically on survey findings related to Tribal Beneficial Uses (TBU) of the Eel River.

Survey Distribution

The survey was distributed between Spring and Summer 2026 through community outreach conducted by Revitalizing Opportunities for the Alderpoint Region (ROAR).

Participants were invited to contribute through:

- Online survey responses
- Direct communication with project staff
- Community outreach efforts
- Cultural Resource Study engagement activities

The survey was intended primarily for Wailaki/Kinest'e Tribal descendants, Eel River Tribal community members, knowledge holders, elders, youth, and other individuals with cultural connections to the Eel River region. Participation was voluntary. Respondents were informed that they could skip any question, participate anonymously, or request confidentiality.

Survey Responses

As of June 2026, the survey received 38 responses. Because participants were encouraged to answer only questions they felt comfortable responding to, response totals vary between individual questions. Percentages reported throughout this document are therefore based on the number of responses received for each specific question rather than the total number of survey participants. This allows the report to reflect specific areas of individual knowledge accurately.

Analysis Methods

Survey results included both quantitative and qualitative data. Quantitative data consisted primarily of multiple-choice responses, checkbox selections, use categories, and river health concerns. These responses were summarized using counts, percentages, and frequency analysis. Qualitative data consisted primarily of written comments, personal reflections, traditional ecological knowledge, and stewardship recommendations. Written responses were reviewed to identify recurring themes and patterns across participants.

Confidentiality and Data Sovereignty Protection

Participants were given multiple options regarding how their information could be used. Some respondents authorized use of their names and comments in project documentation. Others requested anonymity or limitations on how their information could be shared.

To respect those requests, direct quotations are only included when consistent with participant permissions, sensitive cultural locations are omitted, and responses have been summarized at a general level where necessary to protect privacy. The survey team recognizes the importance of Indigenous Data Sovereignty and the right of Tribal communities to guide how cultural information is collected, stored, and shared.

Limitations

Participation was voluntary and therefore does not represent a random sample of all Tribal community members. Response rates varied between questions because participants were encouraged to answer only those questions they wished to address. The survey was designed to document community knowledge, experiences, concerns, and priorities rather than to produce statistically representative population estimates.

Despite these limitations, the survey provides valuable documentation of ongoing Tribal relationships with the Eel River and offers clear evidence regarding Tribal Beneficial Uses, cultural practices, and restoration priorities identified by participants.

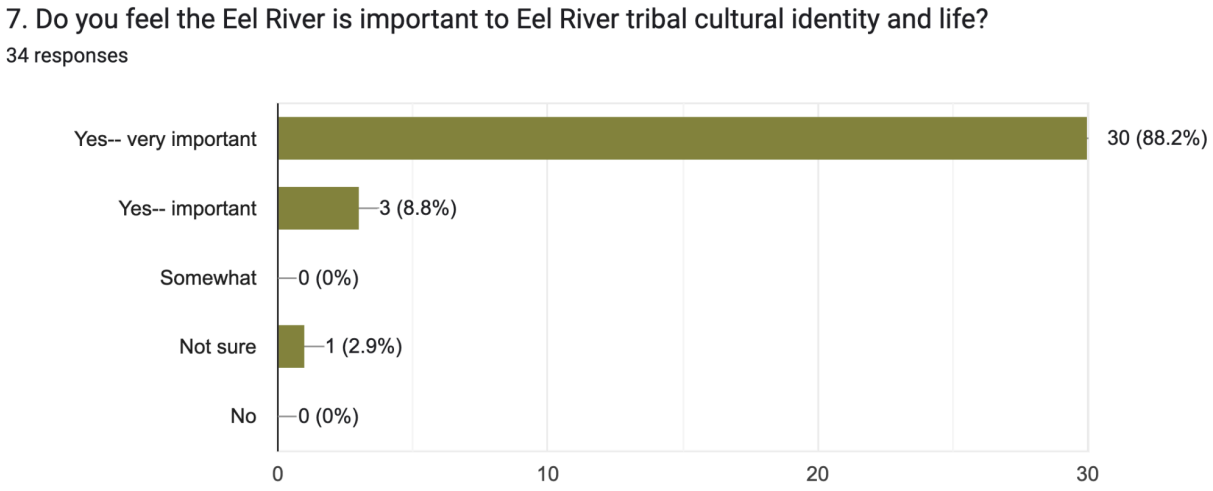
4. QUANTITATIVE SURVEY RESULTS

Question TBU-1: Tribal Identity and the Eel River (Survey Question TBU #7)

Question: "Do you feel the Eel River is important to Eel River Tribal cultural identity and life?"

Responses (n=34)

- Yes – Very Important: 30 responses (88.2%)
- Yes – Important: 3 responses (8.8%)
- Not Sure: 1 response (2.9%)
- No: 0 responses (0%)



Key Finding: 97.1% of respondents identified the Eel River as important or very important to Tribal cultural identity.

Question TBU-2: Traditional and Cultural Uses of the Eel River

Question: "How have you, your family, or your ancestors used—or wished to use—the Eel River and its riverbanks?" **Responses (n=34, participants selected multiple options)**

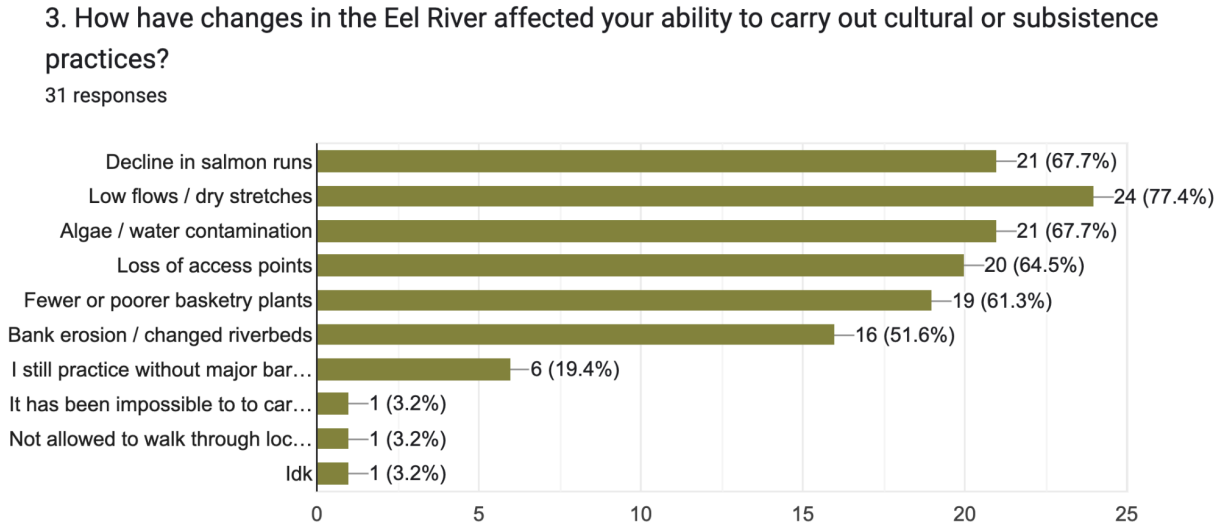
- Swimming, Canoeing, Family River Activities: 31 responses (91.2%)
- Gathering Basketry Materials: 26 responses (76.5%)
- Gathering Medicinal or Food Plants: 24 responses (70.6%)
- Historically Harvested Salmon: 22 responses (64.7%)
- Ceremonial or Spiritual Practices: 22 responses (64.7%)
- Teaching Youth Traditional Knowledge: 22 responses (64.7%)
- Visiting Ancestral or Cultural Places: 22 responses (64.7%)
- Historically Harvested Lamprey or Mussels: 19 responses (55.9%)

Key Finding: Respondents use the river for multiple overlapping cultural, educational, and subsistence activities.

Question TBU-3: Changes Affecting Traditional Practices

Question: "How have changes in the Eel River affected your ability to carry out cultural or subsistence practices?" **Responses (n=31, participants selected multiple options)**

- Low Water / Dry River Conditions: 24 responses (77.4%)
- Decline in Salmon Runs: 21 responses (67.7%)
- Algae or Water Contamination: 21 responses (67.7%)
- Loss of Access Points: 20 responses (64.5%)
- Fewer or Poorer Basketry Plants: 19 responses (61.3%)
- Riverbank Erosion / River Changes: 16 responses (51.6%)
- Still Practice Without Major Barriers: 6 responses (19.4%)



Anabaena, a toxin-producing cyanobacteria, in and around dying green algae. (Photo by Rich Fadness, NCRWQCB)

Key Finding: Most respondents report significant environmental barriers to maintaining traditional relationships with the Eel River.

Question TBU-4: Current Harvesting of Fish and River Foods

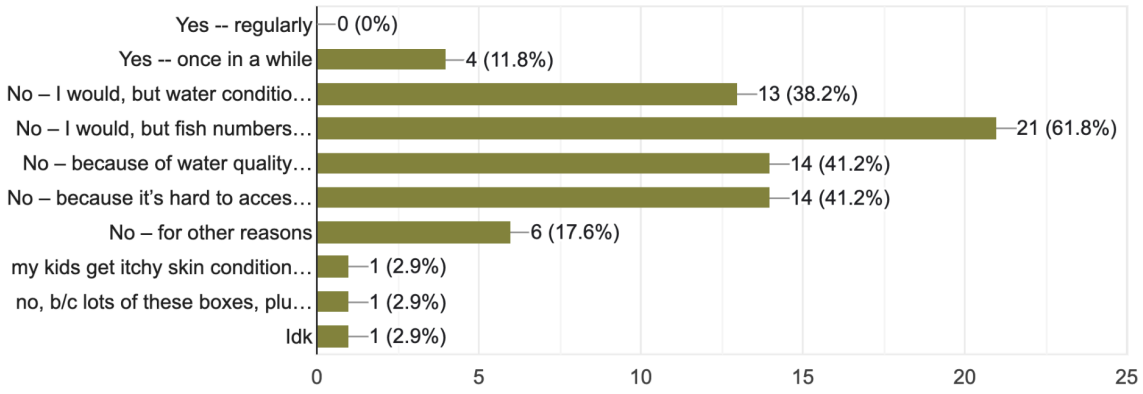
Question: "Do you currently eat or harvest fish or other river foods from the Eel River today?"

Responses (n=34, participants selected multiple options)

- Would Harvest if Fish Numbers Improved: 21 responses (61.8%)
- Water Quality Concerns Prevent Harvest: 14 responses (41.2%)
- Access Limitations Prevent Harvest: 14 responses (41.2%)
- Poor Water Conditions Prevent Harvest: 13 responses (38.2%)
- Currently Harvest Occasionally: 4 responses (11.8%)

4. Do you currently eat or harvest fish or other river foods from the Eel River today?

34 responses



Key Finding: Current harvesting is substantially constrained by reduced fish populations, degraded water quality, and access limitations.

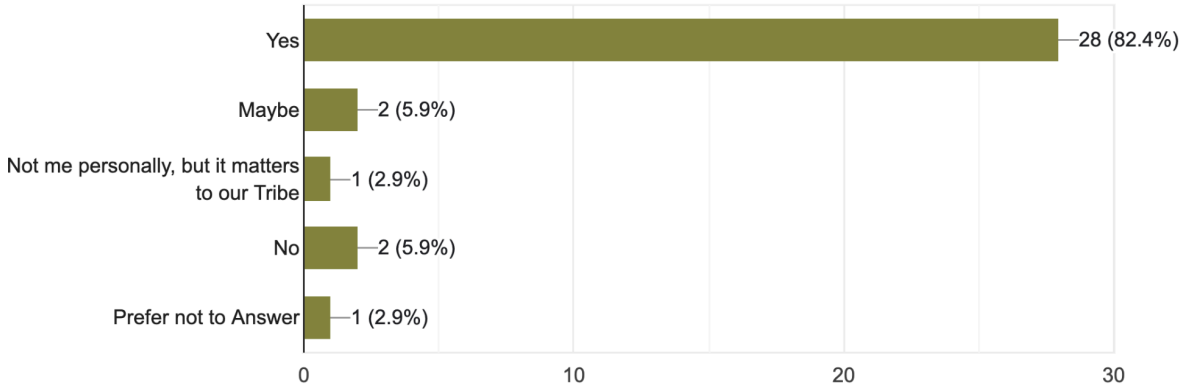
Question TBU-5: Future Harvesting if River Conditions Improve

Question: "If the river were healthier (better flows, clean water, stronger fish runs), would you want to fish or harvest there again?" **Responses (n=34)**

- Yes: 28 responses (82.4%)
- Maybe: 2 responses (5.9%)
- Not Me Personally, But Important For Tribe: 2 responses (5.9%)
- No: 2 responses (5.9%)

5. If the river were healthier (better flows, clean water, stronger fish runs), would you want to fish or harvest there again?

34 responses



Key Finding: 88.2% expressed explicit interest or potential interest in renewed harvesting if river conditions improved.

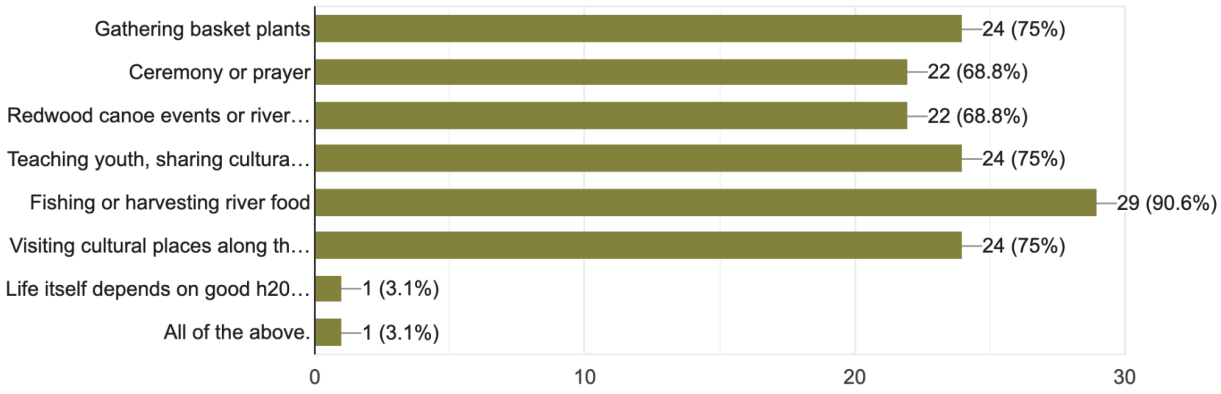
Question TBU-6: Cultural Activities Dependent Upon Clean Water

Question: "Which traditional or cultural activities depend on clean, healthy water in the Eel River?" **Responses (n=32, participants selected multiple options)**

- Fishing / Harvesting River Foods: 29 responses (90.6%)
- Gathering Basket Plants: 24 responses (75.0%)
- Teaching Youth: 24 responses (75.0%)
- Sharing Cultural Knowledge: 24 responses (75.0%)
- Visiting Cultural Places: 24 responses (75.0%)
- Ceremony / Prayer: 22 responses (68.8%)
- Canoe Events / River Gatherings: 22 responses (68.8%)

6. Which traditional or cultural activities depend on clean, healthy water in the Eel River?

32 responses



Key Finding: Clean water is a baseline requirement for both cultural practices and food harvesting.

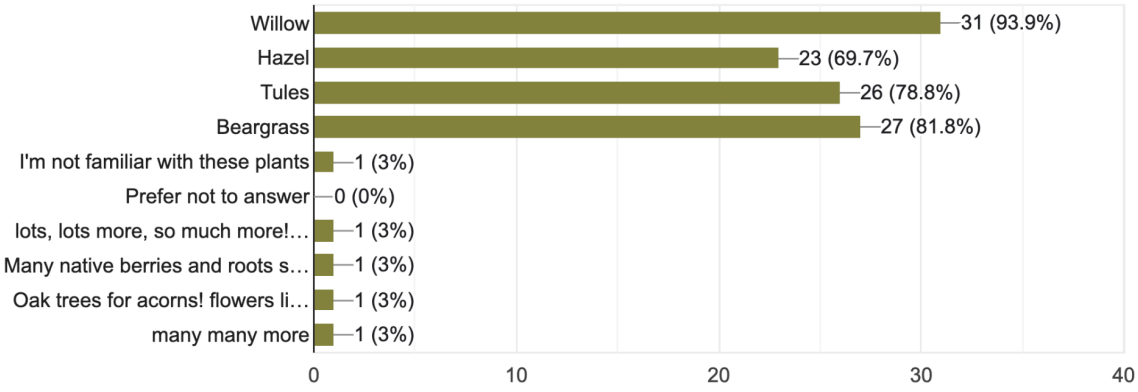
Question TBU-7: Traditional Plant Knowledge

Question: "Are you familiar with the traditional use of any of the following plants along the Eel River?" **Responses (n=33, participants selected multiple options)**

- Willow: 31 responses (93.9%)
- Beargrass: 27 responses (81.8%)
- Tules: 26 responses (78.8%)
- Hazel: 23 responses (69.7%)

8. Are you familiar with the traditional use of any of the following plants along the Eel River for cultural practices (such as basketry, medicine, food, or ceremonies)?

33 responses



Key Finding: Traditional ecological knowledge regarding river-corridor vegetation remains active and widespread among respondents.

Native tule ready for cultural use

Photo by Native Health in Native Hands

Invasive Yellow Star Thistle

Question TBU-8: Traditional Uses of Cultural Plants

Question: "Were those plants traditionally used by your ancestors for any of the following cultural purposes?" **Responses (n=33, participants selected multiple options)**

- Basket Weaving: 29 responses (87.9%)
- Shelter / Construction Materials: 24 responses (72.7%)
- Ceremonial Uses: 23 responses (69.7%)
- Medicine: 21 responses (63.6%)
- Food: 21 responses (63.6%)
- Tools: 21 responses (63.6%)

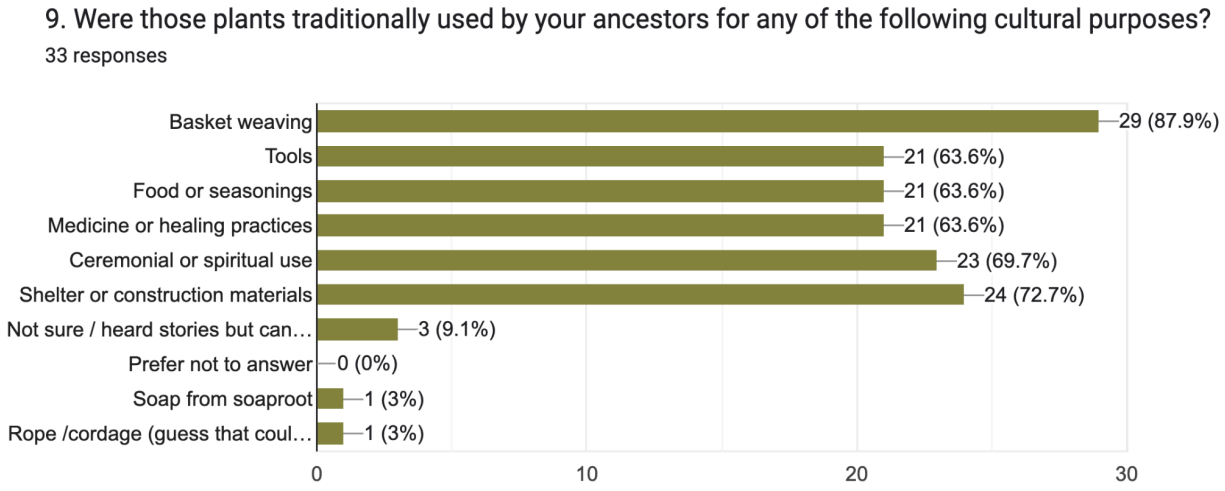


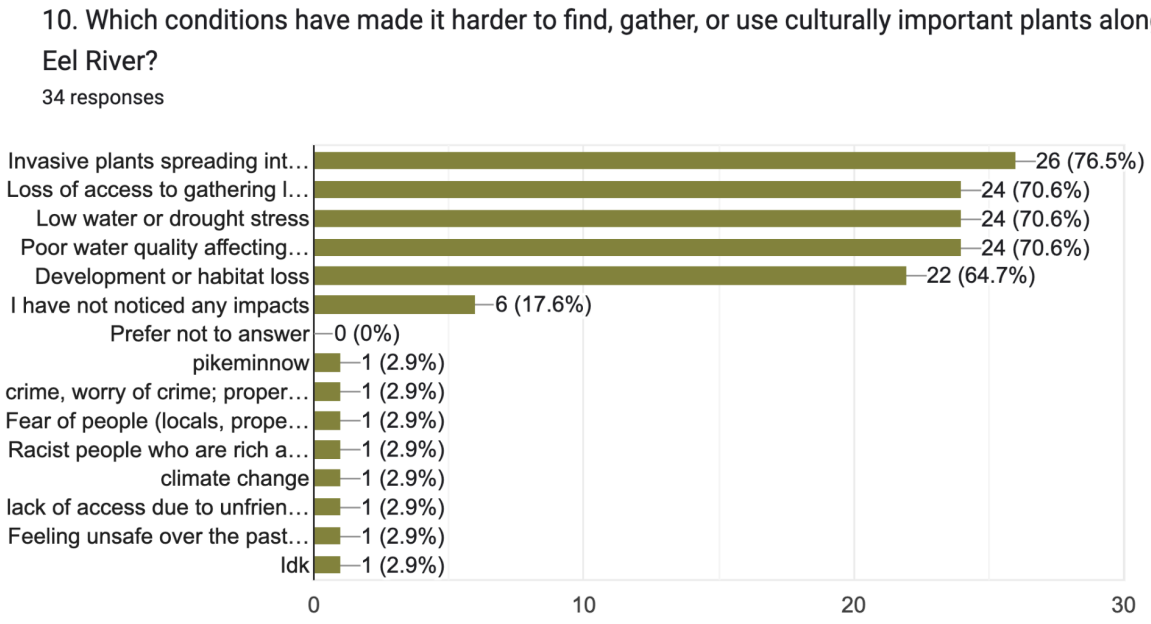
Photo by Native Health in Native Hands

Key Finding: River plants serve specific practical, ceremonial, and food needs.

Question TBU-9: Threats to Culturally Important Plants

Question: "Which conditions have made it harder to find, gather, or use culturally important plants along the Eel River?" **Responses (n=34, participants selected multiple options)**

- Invasive Plants: 26 responses (76.5%)
- Poor Water Quality: 24 responses (70.6%)
- Low Water / Drought: 24 responses (70.6%)
- Loss of Access: 24 responses (70.6%)
- Habitat Loss / Development: 22 responses (64.7%)
- No Impacts Observed: 6 responses (17.6%)



Key Finding: Gatherers face multiple barriers, including weeds, low water, and locked gates.

APPENDIX: SELECTED QUOTATIONS

Community, youth, and local tribal members prepare for a rafting day on the Eel River.

The following direct statements from survey participants provide qualitative evidence supporting the formal definitions of Tribal Tradition and Culture (T-CUL) and Tribal Subsistence Fishing (T-SUB). These responses are tracked directly to the raw survey data rows using the lookup tags below.

Theme 1: Water Quality and Tribal Tradition (T-CUL Support)

"We gather basketry materials like willow, hazel roots, and tules. These plants require clean water and healthy seasonal floods to produce the straight, flexible shoots needed for weaving."
— **R. Whipple** (Respondent Code: R. Whipple, Sheet Row: 38, Column: Cultural Uses / Plant Familiarity)

"We still take our children down to the gravel bars to teach them the old names for the places around Alderpoint. The river is where our history lives. If the water isn't healthy, our connection to our ancestors feels fractured."
— **Survey Participant (Anonymized)** (Respondent Code: TBU-09, Sheet Row: 11, Column: Cultural Knowledge Sharing)

"Our family participates in the annual river float events and traditional canoe practices. This isn't recreation for us; it is a continuation of our cultural identity that goes back generations along the Main Stem."

— **Survey Participant (Anonymized)** (Respondent Code: TBU-23, Sheet Row: 25, Column: Clean Water Interdependence)

Theme 2: Food Security and Tribal Subsistence Fishing (T-SUB Support)

"Subsistence fishing is everything to our winter food supply. Salmon runs have declined significantly, making it much harder to get what we need, but we still rely on what we can catch to feed our elders."
— **Survey Participant (Anonymized)** (Respondent Code: TBU-14, Sheet Row: 16, Column: Ancestral & Family Food Uses)

"We fish for salmon, steelhead, and eels. It's a primary source of traditional food security for us. When the flows are too low or the water is too warm, the fish don't make it, and our dinner tables show the impact."
— **Survey Participant (Anonymized)** (Respondent Code: TBU-31, Sheet Row: 33, Column: River Degradation Impacts)

Theme 3: Tribal Identity, Stewardship, and Continuity

"The River is my home and it always will be no matter how far I travel or where I go. I will always be connected. I've tried to teach my children about the old ways and stay away from the political aspect of tribal issues. I prefer to be alone with my children, along the river, learning, honoring and preserving. However, as I've gotten older, I have no problem, stepping beyond that threshold to help protect our home."
— **J. Matthews** (Respondent Code: J. Matthews, Sheet Row: 39, Column: Final Comments / Open Response)

"I am teaching my grandchildren how to find and pull sedge roots along the riverbanks just like my grandmother taught me. But invasive weeds are choking out the sandy spots where the best roots grow."
— **Survey Participant (Anonymized)** (Respondent Code: TBU-18, Sheet Row: 20, Column: Specific Gathering Barriers)

ADDENDUM: ONE-PAGE FERC SCOPING HANDOUT

Designed for distribution at the Ukiah Valley Conference Center scoping meeting on June 24, 2026, and for submission to the FERC eLibrary under Docket P-77.

PUBLIC COMMENT SCOPING SUBMISSION: POTTER VALLEY HYDROELECTRIC PROJECT (NO. 77-332)

Eel River Dam Removal Is Cultural Resource Protection
Submitted by: Revitalizing Opportunities for the Alderpoint Region (ROAR)
Data Source: 2026 Eel River Tribal Community Survey (38 Indigenous Respondents)

Core Position & Scoping Requests for the NEPA Document

1. **Support Complete Dam Removal as the Only Long-Term Solution:** ROAR agrees with the FERC Scoping Document that retaining Scott Dam is not a viable alternative due to seismic risks and ongoing economic losses. The final National Environmental Policy Act (NEPA) document must treat the full, complete removal of both Scott Dam and Cape Horn Dam as the primary objective to restore fish passage and natural river function.
2. **Demand an Expedited NEPA Review Process:** Threatened and endangered fish species in the Eel River cannot survive regulatory delays. FERC must move the NEPA process forward efficiently to allow decommissioning to proceed without unnecessary procedural delays.
3. **Include a "No New Eel-Russian Facility (NERF)" Alternative:** While regional wet-season water reliability can be addressed through collaborative basin agreements, the construction of new diversion infrastructure (NERF) must not delay dam removal. FERC must evaluate a "No NERF" alternative in the environmental document to ensure that if local authority funding or construction lags, PG&E is still required to remove the dams on schedule.
4. **Reject Out-of-Basin Water Transfers:** ROAR opposes any proposal to transfer project infrastructure or water rights to outside agencies, such as southern water districts. The decommissioning process must remain focused on regional ecosystem restoration and local watershed health.

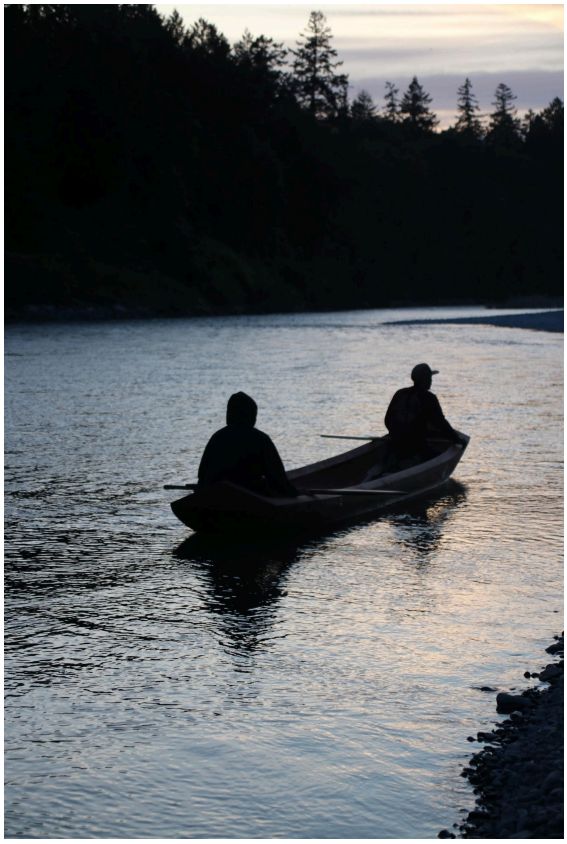
Survey Data: How River Conditions Impact Tribal Practices
Conventional environmental reviews evaluate dam removal through biological metrics alone. Data collected from 38 local tribal members, descendants, and knowledge holders demonstrates that ecological restoration directly affects cultural survival:

- **Identity and Connection (97.1%):** 97.1% of respondents identify the Eel River as important or very important to tribal cultural identity and life.
- **Practice Suppression (84.2%):** 84.2% report that environmental changes—specifically low flows, drought stress, and toxic algae blooms—harm their ability to practice cultural and subsistence traditions.

- **Food System Collapse (71.1%):** 71.1% of respondents have stopped harvesting fish and river foods due to collapsed salmon runs and water quality safety concerns.
- **Interest in Returning to the River (94.7%): 94.7% state they will return to fishing.:** 94.7% state they will return to fishing and subsistence harvesting if water conditions, flows, and fish runs are restored through dam removal.
- **Intergenerational Risk (86.8%):** 86.8% state that passing down tribal identity and traditional ecological knowledge to youth depends directly on clean water. Low summer flows cause toxic algae blooms, preventing elders from safely taking children to the riverbanks to teach them.

Conclusion for Decision Makers

For families along the Main Stem from Alderpoint to Dos Rios, wild salmon runs are fundamental to cultural preservation. Dam removal is not simply a fisheries management strategy; it is a direct mechanism for cultural revitalization. FERC must ensure the swift, full removal of these facilities to protect both the river ecosystem and the living culture of the people who belong to it.



Tribal members in a traditional dugout canoe on the Eel. Photo by ROAR.