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

Submitted via FERC Comment site

3/20/25

FERC Project No. 77 opposition of the Decommissioning of Scott Dam
Dear Secretary Bose:

I am writing to submit comments regarding the proposed decommissioning of the Scott Dam and the Van Arsdale dam currently under review by the Federal Energy Regulatory Commission. I am one of thousands of people who are wondering how this entire process is being managed. How on earth is PG&E, or any other entity, allowed to take such drastic irreversible action destroying the existing water storage facility that California so desperately needs. And to do this and not allow all of the real stakeholders to be part of that decision, to present facts and opinions from all impacted people. PG&E wants us to believe that all the alternatives possible were considered and tearing the dam down was the best alternative. What a joke. This project has been clearly biased from day one when Huffman started this whole idea and kept out anyone at all that even mentioned the idea of NOT tearing down the Scott Dam. They have not been interested in the slightest in the needs and wants of the actual stakeholders, the people and habitat of the eel river and those in the community of Lake Pillsbury, the amazing lake that they propose to eliminate forever!

Lake Pillsbury has been in existence since the early 1920's. It was created to produce energy and benefits regulated water flow from the Eel River, and the Russian River by an inter-basin connection with the Eel as part of the "Potter Valley Project". It produces clean hydro-electric power serving Potter Valley and Ukiah. Ultimately it created unique,

protected habitats for elk, deer, bears, freshwater otters, bald eagles, osprey, and fish, as well as an important water reservoir critical for wildfire control and recreational resource for the Mendocino National Forest and surrounding region. In 1985 the Army Corps of Engineers introduced Florida strain Bass to the lake. Pillsbury is now one of the best bass fishing lakes in California, attracting anglers from all over the state and even some from out of state in the spring. Pillsbury is one of very few lakes in CA that has produced multiple fish over 10 pounds over the years. That cannot be replicated, this evolution as a fishery is due to the abundant forage in the lake, blue gill, trout and crawdads are all present. The Bass population has never been restocked since 1985, it is self-sustaining and supported by most of the anglers practicing catch-and-release.

My family has a multi-generational relationship with Lake Pillsbury, we have owned the Rice Fork Lodge property since 1969, we lost the historic Lodge in the 2018 Ranch fire but the brave firefighters used Lake Pillsbury to finally stop the biggest fire in the history of California. That would not have been possible without the water storage of Lake Pillsbury. We are in the process of rebuilding as are our neighbors and this ridiculous plan to take down the dam is very unsettling. Honestly, if the dam comes down our property value will plummet, likely leaving us and many other homeowners left to try and sue PG&E for the devaluation they will create if they eliminate the lake from our lake side homes. But that is trivial compared to the travesty of eliminating a fully functional drastically needed water storage facility and surrounding community.

As with many of the other homeowners at Pillsbury we have served as responsible environmental stewards of the lake, its basin and the surrounding National Forest. We are acutely aware of the value of Lake Pillsbury serving as an important water reservoir, environmental habitat, clean power generator, fire mitigation reserve, recreational resource and a regulatory management of water flow for many downstream uses and activities. I personally am a member of the Lake Pillsbury Fire Protection District and we are steadfastly opposed to the removal of this lake!

I strongly support formation of a new regional entity to take over the Potter Valley Project, but do not support removal of Scott Dam. As currently proposed in the decommissioning plan from PG&E, Lake Pillsbury and its basin, including its 100-year old ecosystems and wildlife habitats will be negatively impacted and permanently changed.

Since the formation of Congressman Huffman's farce of an Advisory Ad Hoc Committee through the completion of the NOI Parties' Feasibility Study, Lake Pillsbury homeowners, recreational users and businesses have been denied access to participate in discussions shaping a proposed direction for relicensing of the Potter Valley Project. In addition, Lake County, where the lake is located, was blocked from joining the NOI Parties conducting the Feasibility Study, and minimized in other decision-making discussions. Lake County was significantly impacted by recent wildfires, and the loss of Lake Pillsbury will further impact the County economy as property values, recreation and tourism revenues decline. Let me repeat that, that actual people, tax payers, property owners and people who live and work in that area every day / week / year are not included, but the people making these decisions will then go back to their homes elsewhere and leave us to have to try and live with their actions.

If Scott Dam is removed Lake County will lose a critically important water reservoir, part of its Wildfire Protection Plan to combat wildland fires. In 2018, the Mendocino Complex fire burned 460,000 woodland acres in four counties, Lake, Mendocino, Colusa and Glenn. This was the largest wildfire in California history. This massive fire was halted at Lake Pillsbury, which proved to be a formidable barrier that prevented the fire from advancing further into the Mendocino National Forest. The lake reservoir also served key firefighting efforts by water dropping aircraft that used the lake to refill water tanks. California climate change projections anticipate continued years of drought, increasing temperatures, and greater risks of wildfires.

The proposed plan from PG&E does not assure water supply reliability for the 600,000 agricultural and domestic users in Sonoma, Mendocino and North Marin Counties. It does not assure minimum flows in the Eel and Russian Rivers to support endangered salmonids, nor does it assure water quality, water volumes, aquifer replenishment, projected and prolonged California droughts, recreation and tourism throughout the Russian River system including the communities and agricultural interests it serves. All these issues must be considered. Regulated water release ensures managed water flows throughout the year. Historically, the regulated release has controlled both timely water supply, and prevented downstream flooding.

Thousands of people visit the Lake Pillsbury basin throughout the year. The proposed decommission plan from PG&E needs to address the economic impacts to Lake County as property and sales taxes will decline significantly. The impacts will be felt regionally in both Lake and Mendocino Counties. The US Forest Service will also suffer losses in service fees and permits.

PG&E's direct capital cost estimates to remove Scott Dam, manage 12 million cubic yards of sediment, conduct some measure of revegetation and refurbish the remaining infrastructure is estimated between \$100 million to \$500 million. And that could be as inaccurate as most of their other research has been and could actually surpass \$1,000,000,000 This does not even address the question of who will be paying for this. Is it 100% funded by PG&E or will the people of Lake County eventually be forced to participate in this funding?

An alternative which I, and the lake community, support is a win-win option of building an improved fish passage at Cape Horn Dam and new, state of the art, passage facilities at Scott Dam. This more reasonable and affordable approach has an estimated cost of \$40 million to \$60 million, and includes a generous contingency. This win-win option meets the goals of Congressman Huffman's Ad Hoc Committee and the goals of the lake user

community. In addition, the sources of funding for this latter option include fishery improvement grants, as well as assessment of local users, diminishing the significant public costs included in the existing decommissioning proposal. Possibly the Army Corps of Engineers can get involved like they are for Mendocino and Sonoma.

PG&E's "all or nothing" solution is formed from a bias that the dam removal is the only alternative. However, this position is based on assumptions, and lacks environmental study. Salmonid migration experts believe the inland portions of the Eel are far too warm during the summer months to support, cold water pools to sustain fish over the dry season. Climate change producing warmer ocean temperatures, multi-year droughts and increased water acidity all will contribute to a questionable environment for salmonids. In addition, the Feasibility Study has significantly overestimated the presumed upstream migration habitat above Scott Dam.

There are impact concerns for the thriving wildlife ecosystem habitats that exist within the Lake Pillsbury Basin if the dam was removed, especially for the Tule elk, protected by the Public Trust Doctrine (PTD) and nesting bald eagles which are listed by the USFWS as Birds of Conservation Concern (BCC) and USFS as Forest Service Sensitive (FSS). Bald eagles hunt over the still lake water, and do not hunt over moving rivers. Lake Pillsbury hosts migratory birds, a wide variety of duck species and Canadian geese. Impacts from radical changes to this environment need to be evaluated. Tule elk and black tailed deer are both knee-deep lake waders and lake weed feeders. The lake also supports bears, mountain lions, foxes, rabbits, freshwater otters, turtles, and a variety of aquatic species.

One of the ongoing frustrations in this process is the countless supporters of the take down the dam proposal that have one or two things in common. 1. They do not live or work anywhere near the lake or the Eel River (many of their "supporters" are out of state people) and/or 2. They do not have facts only speculation on what might happen if the dam came down. It appears as though all those supporters of the dam coming down have one

common theme. They don't seem to place any value in the life above the Scott Dam. Supporters of the removal simply say tear down a dam because "dams are bad". This is insane, dams are part of the evolution of this country, people learned how to better use what God created. These advocates of removing the dam are not "stakeholders", they have no vested interest, have no facts to conclude that Salmon / Steelhead would actually benefit from tearing down the dam only speculation. The fact is removing the dam that controls waterflows and makes sure there is water 12 months a year could actually make the habitat worse for the fish they are trying to protect. Fish need water I think we can all agree on that. I would be curious if they voted the same way if they had to give up a home or their vacation spot etc. or the view out of their house, wherever it is, in order to get their wish. It's pretty easy to eliminate someone else's lake or kill off some other species habitat when you don't have to experience it yourself?

On 24 Jul 2018, the state of California approved spending \$2.5 billion to help fund construction of four new dams and four underground storage projects to help alleviate water shortages across the state. It is the largest commitment of state money to construct new dams and water storage projects in California since 1960, when voters approved a bond to build Oroville Dam and the State Water Project. How does it make sense to authorize \$2.5 billion to increase water storage within the state and then spend \$500Million to \$1 Billion to remove existing water storage that feeds 5 counties?

There is an unfounded belief that Scott Dam, which does not have a fish ladder or other means of fish passage, is the single major impediment to a declining fishery within the Eel River system. They do not consider other major influences that have damaged the salmonid migration that include lumber practices, road and railroad construction; major floods which have all significantly changed the morphology of the river since Scott Dam was erected. Other factors that have damaged the fishery are a huge unregulated and "outlaw" cannabis industry which introduced pesticides, fertilizers, and massive water diversions.

In summary, the lake supports the economy, critical habitats, environmental balancing, clean energy production, many important public policies, critical wildfire management and protection, key local economies, sustainable water management, and multiple recreational uses. I believe the proposed solution of maintaining and improving the Scott Dam and researching a fish ladder system is a win-win for all parties.

Thank you for your consideration.

Sincerely,
Dave Luhrs
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