



July 23, 2026

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

**Re: COMMENTS on Scoping Document 1 for the proposed Potter Valley Hydroelectric Project
Surrender and Decommissioning, P-77-332**

Ms. Reese,

On behalf of San Francisco Crab Boat Owners Association, I am writing to express our complete support for full removal of the Potter Valley Project.

Crab Boat Owners Association (CBOA) has represented the San Francisco commercial fishing fleet for over 100 years. Our commercial members harvest salmon, crab, groundfish, and other species from the Pacific Ocean to provide healthy protein and food security to consumers in California and beyond. Our historic boat members are dedicated to preserving the working history of the San Francisco fishing fleet. Though we are not geographically near the Eel River watershed, commercial fleets from San Francisco and the entire west coast have historically harvested Eel River fish since *before* the construction of Scott and Van Arsdale Dams. North coast fisheries supported thousands of individual fishermen, their families, and coastal communities throughout California. The timely and thoughtful decommissioning of these environmentally destructive dams will have great impact on commercial and recreational ocean fisheries from Cape Falcon (Oregon) to the Mexico border.

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 and is eager to remove the Potter Valley Project from its portfolio. Among many shortcomings, Scott Dam lacks fish passage entirely, while Cape Horn Dam's fish ladder, the highest and longest in California, nearly completely impedes fish passage despite decades of attempts to improve its function. Removal of Scott and Cape Horn dams is the only feasible means of restoring passage for Chinook salmon and steelhead into the upper reaches of the mainstem Eel River watershed.

The FERC scoping under this license surrender application process must include the following:

1. Plans for reservoir drawdown, dam removal, and anticipated sediment movement must minimize the impact to salmon populations. The majority of anticipated negative impacts to salmon populations can be minimized by careful timing of reservoir drawdown, i.e., during times when juvenile, adult, or incubating salmon are not in the river system.
2. Pike minnow populations in Lake Pillsbury reservoir must be addressed. This introduced predator of juvenile salmon is devastating during the out-migration period. Populations behind Scott Dam should be targeted for removal before drawdown of the Lake Pillsbury reservoir.
3. In collaboration with National Marine Fisheries Service, California Department of Fish and Wildlife, and fishing representatives, reintroduction plans for Endangered or Threatened salmon and steelhead should be drafted. After more than 100 years of diversion, blockage from spawning grounds, and poor water quality, salmonid populations in the Eel River have declined by over 95%. Rebuilding the riverine ecosystem, population strongholds, and ocean fisheries depends on an accelerated plan for rebuilding Eel River salmonid populations.

Thank you for considering these details in the FERC scoping process for removal of Scott and Van Arsdale Dams.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Bates". The signature is fluid and cursive, with the first name "Sarah" being more prominent than the last name "Bates".

Sarah Bates.

Treasurer, Crab Boat Owners Association