



COUNTY OF HUMBOLDT BOARD OF SUPERVISORS

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July 17, 2026

Diana Shannon
Division of Hydropower Administration and Compliance
Office of Energy Projects
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 204256

Submitted via eFiling

Subject: Potter Valley Hydroelectric Project No. 77-332 – Scoping Document 1

Dear Ms. Shannon:

The County of Humboldt hereby submits comments on Scoping Document 1 (dated May 22, 2026) for the proposed Potter Valley Hydroelectric Project surrender and decommissioning along with the proposed non-project use of project lands to construct the New Eel-Russian Facility.

Background and Overview of Humboldt County's Interests

The Potter Valley Project is located on the upper portion of the Eel River in Mendocino County. From there, the Eel River flows downstream through Humboldt County for 81 miles before entering the Pacific Ocean. The Eel River watershed encompasses approximately 33% of Humboldt County and is highly valued by residents and communities for providing fish and wildlife habitat, water supply, recreation opportunities, scenic beauty, and tribal beneficial uses. The ecosystem services and beneficial uses of the Eel River are vital parts of Humboldt County's core community values and identity.

PG&E made a business decision in 2019 not to pursue re-licensing the Potter Valley Project and to decommission and remove certain facilities because the Project operates at a significant financial loss and represents substantial risks and liabilities. PG&E made this decision in the interests of rate-payers across the State of California and the company's shareholders.

Humboldt County appreciates FERC initiating the NEPA process in response to PG&E's license surrender application and decommissioning plan and FERC's commitment in Scoping Document 1 to conduct an accurate and thorough analysis of the effects on the environment associated with the Proposed Action.

Historically, the Eel River watershed supported some of the largest runs of salmon and steelhead on the North Coast; however, these fisheries suffered a major decline through the 20th century. The Potter Valley Project was a significant contributing factor to the decline of Eel River fisheries and the health of the river by blocking fish passage above Scott Dam, disrupting natural river processes, altering the natural flow regime, and providing a source for invasive species such as the Sacramento pikeminnow. Given this context and history, FERC's action to approve PG&E's license surrender application is expected to have substantial positive outcomes for the Eel River environment overall.

3.2 Applicant's Proposed Action

Humboldt County has worked closely with our neighbors in Mendocino County and Sonoma County along with tribes and conservation organizations to develop the Two-Basin Solution framework for adapting to the decommissioning of the Eel River dams in a way that addresses the needs of both the Eel and Russian River basins and their communities. The Two-Basin Solution enables local control of water resources and is planned to ensure continuity of supply to the Russian River during dam decommissioning.

In July 2025, Humboldt County joined Sonoma Water, Mendocino Inland Water and Power Commission (IWPC), Round Valley Indian Tribes, California Trout, Trout Unlimited, and California Department of Fish and Wildlife as signatories to a Water Diversion Agreement which supports removal of the two dams and construction of the New Eel-Russian Facility, also known as NERF, to support water supply in the Russian River following dam removal. The Eel-Russian Project Authority was formed to lead the construction and operation of NERF and 100% funding has been secured for the design and permitting of NERF, which is currently underway.

Two-Basin Solution documents are available here: <https://www.eelrussianauthority.org/reports>

The Water Diversion Agreement contains rules and criteria for water diversions using the best available scientific information to account for the needs of Eel River fisheries and their life-history stages. We understand that the NEPA document for the Proposed Action will analyze the effects of NERF construction, while evaluation of NERF operations will be conducted separately through the permitting actions for NERF which do not involve FERC.

Humboldt County appreciates that PG&E included provisions related to NERF in its license surrender application, and we will continue working with supporters of the Water Diversion Agreement to help make NERF a successful enterprise. The parties of the Water Diversion Agreement are working closely with PG&E to plan for NERF to be constructed simultaneously with the decommissioning of Cape Horn Dam to ensure negligible gaps in water supply. The parties are also working together to support Mendocino IWPC and Potter Valley Irrigation District evaluating the feasibility of water storage options (e.g., pond storage, groundwater storage and recharge, new surface storage) for water users in Potter Valley.

3.4 Alternatives considered but eliminated from detailed study

Some commenters will likely request that FERC analyze retention of Scott Dam as an alternative in the NEPA document. We understand that under long-standing policy, FERC cannot force an owner of a federally licensed project to continue operating a facility against their will. From March 2019 through April 2022, third-party entities had the opportunity to apply for re-licensing the Potter Valley Project. In April 2022, FERC determined that no adequate license application had been received and directed PG&E to initiate the license surrender and decommissioning process. Therefore, retention of Scott Dam is not a feasible alternative and does not warrant detailed study.

4.2.2 Water Use and Hydrology

Scoping Document 1 expressed FERC's intent to analyze effects on downstream Eel River water users. Please note that the Scotia Community Services District and the City of Rio Dell, both located in Humboldt County, are downstream water users who utilize surface water from the Eel River for municipal water supply. Dam decommissioning could affect the drinking water supplies for these communities through the release of sediment stored behind Scott Dam and Cape Horn Dam. The NEPA document should analyze potential impacts to water quality, sedimentation, and channel migration resulting from dam removal which could affect the water infrastructure of the Scotia Community Services District and the City of Rio Dell, and PG&E should identify appropriate protective and/or response measures.

4.2.12 Socioeconomics

Scoping Document 1 expressed FERC's intent to analyze the effects of the Proposed Action on recreation value, community way of life, and habitat and species-related cultural and economic values. The NEPA document should identify and consider the effects of the Proposed Action on Eel River sport fishing, ocean sport fishing, ocean commercial fishing, and whitewater recreation along with the associated use and non-use benefits for Humboldt County, Mendocino County, and other affected counties. The NEPA document should also identify and consider the economic effects associated with fishery restoration, reintroduction, and monitoring and implementation of mitigation measures. For reference, studies on the socioeconomics of dam removal on the Klamath River may be helpful, including:

- Klamath Dam Removal Overview Report for the Secretary of the Interior – An Assessment of Science and Technical Information (prepared by U.S. Department of the Interior, U.S. Department of Commerce, National Marine Fisheries Service; March 2013)
- Final Environmental Impact Statement for Hydropower License Surrender and Decommissioning Lower Klamath Project: FERC Project No. 14803-001 Klamath Hydroelectric Project and FERC Project No. 2082-063 (prepared by FERC; August 2022)

The points of contact at Humboldt County for further information are:

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Sincerely,



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