

Sonoma County Farm Bureau
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July 15, 2026

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

RE: Scoping Comments on the Decommissioning and Proposed Removal of the Potter Valley Project (FERC Project No. 77) Scott Dam, Cape Horn Dam, and Associated Water Diversion Infrastructure

To the Federal Energy Regulatory Commission:

The Sonoma County Farm Bureau (SCFB), representing nearly 1,500 agricultural producers, multi-generational family farms, and rural landowners, submits this formal comment in response to the Federal Energy Regulatory Commission's (FERC) scoping meetings regarding the proposed decommissioning and removal of the Potter Valley Project (PVP), including Scott Dam and Cape Horn Dam.

For more than a century, the Potter Valley Project has been a cornerstone of Northern California's regional water security. By diverting a very small percentage of water from the Eel River watershed into the East Fork of the Russian River, the PVP has quietly sustained communities, municipal water supplies, agriculture, and critical aquatic ecosystems across Mendocino, Sonoma, Lake, and Marin Counties.

Decisions currently under consideration by FERC threaten to permanently destabilize this fragile equilibrium. SCFB urges FERC to recognize that removing this infrastructure without fully funded, permitted, and operational successor facilities is a catastrophic gamble with the livelihoods of over 600,000 people.

The removal of the PVP and its associated dams will trigger severe economic losses that will compound annually. To understand the true fiscal risk, the Sonoma County Farm Bureau commissioned an independent economic impact analysis prepared by Economic Forensics and Analytics (available at SCFB PVP Economic Impact Report).

The findings are unambiguous:

- Even a modest 10% reduction in water currently supplied to Sonoma County through the Potter Valley Project would result in an estimated 67.5 million dollars in direct economic losses in the first year alone.

- These losses are not static. Year over year, the economic damage will compound as decreased water availability permanently limits crop selection, lowers yields, and stalls long-term investments.
- Sonoma County's agricultural sector, specifically our world-renowned, premium wine-grape and dairy industries, will bear the immediate brunt of these reductions. This economic contraction will ripple instantly into the broader economy, affecting agricultural processing, equipment suppliers, seasonal farmworkers, tourism, hospitality, and municipal tax bases.

Agriculture does not exist in a vacuum. A threat to our agricultural water supply is a direct threat to the financial viability of our entire local business ecosystem.

Proponents of total dam removal often rely on simplified environmental narratives. However, historical data demonstrates that regulatory flow reductions over the past two decades have completely failed to deliver the ecological benefits predicted by special interest groups.

A review of fish count data recorded at Cape Horn Dam shows that reduced diversion flows have not improved the native salmonid population. The average salmon count for the five years preceding 2025 was just 1/3 (33%) of the average recorded in the five years preceding the 2005 flow reductions. Steelhead trout counts for that same five-year period collapsed to just 1/4 (25%) of their pre-2005 levels.

This biological reality proves that dismantling infrastructure will not act as a magical ecological cure-all. Regulatory agencies must analyze the complex factors affecting fish survival, including ocean conditions, habitat degradation, and predatory species, rather than lazily relying on flow manipulation at the expense of human communities.

The Critical Limitations of The "Two-Basin Solution" & Nerf

The proposed "Two-Basin Solution" and the conceptual New Eel Russian Facility (NERF) are frequently presented as viable replacements for the PVP. However, under the current proposed operating rules, these successor projects offer zero practical water reliability.

The proposed Water Diversion Agreement dictates that water cannot be diverted through NERF unless the unimpaired flow of the Eel River exceeds a strict, seasonally established "flow floor." Even when this floor is met, diversions are capped at no more than 30% of the total flow, provided the river does not drop below minimum thresholds. Under these highly restrictive parameters, zero water would have been diverted through the system in the year 2026.

Forcing communities to surrender concrete, physical water storage in exchange for a highly restricted "run-of-the-river" diversion plan is not a water policy; it is a recipe for permanent regional drought.

The proposed removal of Scott Dam and the resulting elimination of Lake Pillsbury present severe environmental, recreational, and safety hazards to Lake and Mendocino Counties. Completed in 1922, Lake Pillsbury has served as the recreational and environmental hub of the Mendocino National Forest for over 100 years. Draining the reservoir will permanently eliminate a thriving wetland and lake ecosystem, destroying local businesses, marinas, campgrounds, and residential communities that rely on tourism. Emptying Lake Pillsbury will immediately lower local water tables, drying up domestic wells, developed springs, and small public water systems that support rural households and recreational facilities.

In an era of increasingly severe wildfires, Lake Pillsbury serves as a critical, immediate, and high-capacity water source for rapid-response aerial firefighting. Eliminating this water source will dramatically increase helicopter and air-tanker response times, exposing Lake County, Mendocino County, and the Mendocino National Forest to catastrophic fire risks.

The Sonoma County Farm Bureau demands that FERC implement a strict, logical, and protective sequence for any decommissioning activities:

- **No Dismantling Without Functional Replacements:** Before any existing water diversion or storage infrastructure is decommissioned, modified, or dismantled, replacement water systems must be fully funded, fully permitted, fully designed, and fully operational.
- **Proportionality of Water Volume:** Even at its historical peak, less than 2% of the Eel River's total drainage was diverted to the Russian River. Since 2020, that average has dropped to just 0.37%. It is an unacceptable, disproportionate trade-off to jeopardize the water security of 600,000 people, municipal systems, and family farms over less than half a percent of the Eel River's annual flow.
- **Taxpayer Accountability:** FERC must require a transparent, comprehensive accounting of who will fund the proposed dam removals, who will pay for alternative municipal water infrastructure, and who will bear the financial liability if the projected environmental benefits fail to materialize.

For generations, the rural communities of Northern California have been stewards of the land, producing the nation's food and managing precious natural resources. Yet, residents, farmers, and business owners have been systematically excluded from the closed-door negotiations determining the future of the Potter Valley Project.

Once Scott Dam and Cape Horn Dam are removed, there is no second chance. You cannot undo the destruction of a regional water supply. The Sonoma County Farm Bureau urges FERC to prioritize human lives, agricultural survival, and common-sense resource management over political pressure and unproven environmental models.

We demand transparency, accountability, and a future of secure water accessibility and availability.

Respectfully submitted,

Dayna Ghirardelli and Pat Burns

On behalf of the Sonoma County Farm Bureau