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Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Submitted electronically via FERC Online

Re: Comments on Scoping Document 1, Potter Valley Hydroelectric Project (P-77-332)

Dear Secretary Reese:

American Whitewater appreciates the opportunity to comment on the Commission's Scoping Document 1 ("SD1") for the proposed surrender of the Potter Valley Project and associated Application for Non-Project Use of Project Lands. We generally agree that SD1 identifies the principal environmental resource areas requiring analysis and appreciate the Commission's effort to identify the issues that should be evaluated through the forthcoming environmental review.

American Whitewater supports the timely initiation and completion of the Commission's National Environmental Policy Act review and agrees with SD1's conclusion that continued operation of the Potter Valley Project under the existing license is not a reasonable alternative for consideration. Thus, our comments are directed toward ensuring that the Commission's environmental review provides a thorough evaluation of the environmental consequences of Project surrender and associated federal actions.

SD1 appropriately recognizes that recreation will fundamentally change following Project removal, but it does not fully identify several of the principal recreation issues necessary to evaluate those changes and their environmental consequences. In addition, the Commission's environmental analysis should clearly distinguish between environmental effects attributable to Project removal and those associated with the proposed Non-Project Use of Project Lands.

The following five comments identify recreation-related and procedural issues that American Whitewater recommends be more explicitly identified within the scope of the Commission’s environmental review.

I. River Access Should Be Identified as a Distinct Recreation Issue

Scoping Document 1 appropriately recognizes that surrender of the Potter Valley Project will fundamentally change recreation opportunities by converting Pillsbury and Van Arsdale reservoirs to free-flowing river reaches. However, while SD1 identifies changes in recreation opportunities as an issue for environmental review, it does not identify public river access itself as a distinct recreation issue requiring analysis.

This omission is notable because PG&E’s License Surrender Application recognizes that restoration of a free-flowing river will require new public river access facilities and identifies potential locations where new access facilities are necessary.¹ Although the applicant acknowledges that dam removal will create new river access needs, SD1 does not identify evaluation of those needs, or public river access more generally, as an issue for environmental review.

River access is not simply another recreation facility; it is the mechanism by which recreation occurs. Dam removal will fundamentally alter how the public reaches and experiences the restored river. Existing reservoir access points will no longer serve the same function, boating routes that presently terminate at Pillsbury Reservoir will transition to free-flowing river reaches, and new recreation opportunities will emerge within areas that have been inundated for decades or have had their flow regulated by the hydropower project. Evaluating how the public will access these restored river reaches is therefore a distinct environmental issue rather than merely an implementation detail.

Whether additional public access is ultimately needed, where such access may be appropriate, and how those needs should be addressed are questions for the Commission’s environmental review. Identifying river access as an issue for analysis does not presume any particular outcome

¹ PG&E acknowledges that, for both the Upper Main Eel and Rice Fork runs, “[f]ollowing Scott Dam removal, boaters will need a new take-out location.” Pacific Gas and Electric Company, *Final Application for Surrender of License and Application for Non-Project Use of Project Lands*, Volume II, Part 2, Table 2.2.3.9-3, at 2.2.3.9-17 (PDF p. 109) (filed July 25, 2025), FERC Accession No. [20250725-5175](#). American Whitewater has identified additional river-access needs. See American Whitewater, *Motion to Intervene and Comments of American Whitewater*, Table 1 (PDF pp. 5–6) (filed Nov. 26, 2025), FERC Accession No. [20251126-5429](#).

or require any specific access improvements. Rather, it ensures that the environmental review evaluates one of the principal recreation consequences—and opportunities—of dam removal.

Accordingly, American Whitewater recommends that Scoping Document 1 be revised to expressly identify evaluation of post-removal public river access needs as part of the recreation analysis.

II. Evaluation of Recreation Planning Needs

Scoping Document 1 appropriately recognizes that recreation will fundamentally change following dam removal, but it does not fully identify the mechanisms by which those changes will occur or the principal issues that must be evaluated to understand their environmental consequences.

The document recognizes that removal of Scott Dam and Cape Horn Dam will convert Pillsbury and Van Arsdale reservoirs from reservoir-based recreation settings to free-flowing river environments, fundamentally changing recreation opportunities throughout the Project area. SD1 also identifies numerous resource issues that may require future planning, monitoring, adaptive management, consultation, and other resource-specific management processes as the environmental review proceeds. Recreation is the notable exception.

While SD1 appropriately identifies recreation as a resource requiring environmental analysis, it does not identify whether a recreation planning process may be necessary to address the substantial changes in recreation opportunities, public access, river safety, visitor information, and other recreation-related issues resulting from Project surrender and dam removal.

This omission is significant because the environmental review will necessarily evaluate recreation impacts associated with the transition from reservoirs to free-flowing rivers. Whether those impacts ultimately warrant coordinated recreation planning is itself an appropriate subject for environmental review. Identifying recreation planning as an issue for analysis does not presume that a Recreation Plan or any particular management measure will ultimately be required. Rather, it ensures that the Commission's environmental review fully considers whether additional recreation planning may be necessary to address the changes created by the proposed action.

Accordingly, American Whitewater recommends that Scoping Document 1 be revised to identify evaluation of post-removal recreation planning needs as part of the recreation analysis.

III. Project-Related River Recreation Safety Should Be Identified as a Distinct Recreation Issue

Scoping Document 1 identifies numerous public safety issues associated with construction activities, including traffic, construction access, emergency response, and other temporary hazards associated with Project implementation. However, it does not separately identify project-related river recreation safety as an issue requiring environmental review following dam removal.

Dam removal will create a free-flowing river through areas that have been impounded for decades. As the river reestablishes its channel, foreseeable changes associated with the proposed action—including channel evolution, sediment redistribution, newly exposed bedrock, project-related debris, retained Project features, and other conditions resulting from Project removal—may affect public navigation and river recreation. These issues are distinct from temporary construction hazards because they relate to the condition of the restored river itself and may persist beyond completion of construction activities.

Similarly, evaluation of Project-related recreation safety may include consideration of whether features created by, retained as part of, or left in place following dam removal could affect public navigation and recreation. Examples include retained Project structures, in-stream placement of dam demolition material, or other Project-related conditions that influence safe passage through or immediately downstream of former Project facilities. These are foreseeable consequences of the proposed action and are appropriately distinguished from natural river processes or unrelated hazards that may develop elsewhere in the watershed.

Identifying project-related river recreation safety as an issue for environmental review does not prejudice the appropriate mitigation or management measures. Rather, it ensures that the Commission's environmental review evaluates whether the proposed action will create or leave Project-related conditions that may affect public navigation and river recreation following Project removal.

Accordingly, American Whitewater recommends that Scoping Document 1 be revised to identify project-related river recreation safety as a distinct issue, separate from construction-related public safety.

IV. Public Flow Information and Stream Gaging Should Be Identified as an Issue

Scoping Document 1 appropriately identifies changes in hydrology and river flows as issues requiring environmental review. However, it does not identify continuation of public flow information and stream gaging as an issue associated with the transition from a regulated hydropower project to a free-flowing river.

The existing stream gages and publicly available streamflow information were developed, in part, to support operation of the Potter Valley Project. Although Project operations will cease following license surrender, the need for reliable public streamflow information will continue. Streamflow information will remain important for public safety, river recreation, resource management, and evaluation of post-removal river conditions.

Continuation of public flow information is distinct from the hydrologic analysis itself. While the environmental review will evaluate how river flows change following Project removal, it should also identify whether continued public availability of streamflow information is an issue requiring consideration as part of the environmental review.

Accordingly, American Whitewater recommends that Scoping Document 1 be revised to identify continuation of public flow information and stream gaging as part of the environmental review.

V. The Environmental Analysis Should Clearly Distinguish Between the Effects of Project Removal and the Proposed Non-Project Use of Project Lands

Scoping Document 1 appropriately identifies the proposed surrender of the Potter Valley Project and the associated Application for Non-Project Use of Project Lands (“NPUPL”) as the actions before the Commission. However, the Commission’s environmental review should clearly distinguish between the environmental effects attributable to Project removal and those attributable to authorization and construction of the proposed New Eel-Russian Facility (“NERF”) under the NPUPL.

This distinction is reflected in PG&E’s Surrender Application. PG&E submitted separate applications for license surrender and for the proposed NPUPL and prepared separate environmental analyses addressing each proposed action. The Surrender Application evaluates the environmental effects of Project removal, while the NPUPL Application evaluates the environmental effects associated with construction of the NERF. In addition, PG&E explains that operation of the NERF will be subject to separate environmental review and permitting by the Eel-Russian Project Authority and other regulatory agencies.

Accordingly, the Commission’s environmental review should avoid conflating environmental effects attributable to Project removal with effects attributable solely to authorization and construction of the proposed NERF. Maintaining this distinction will provide a clearer evaluation of each proposed federal action and the environmental consequences associated with each.

Accordingly, American Whitewater recommends that Scoping Document 1 clarify that the Commission’s environmental analysis will separately identify and evaluate environmental effects

attributable to the proposed Project surrender and those attributable to the proposed Non-Project Use of Project Lands.

Conclusion

American Whitewater respectfully requests that the Commission consider these recommendations as it refines the scope of its environmental review and prepares the forthcoming environmental document. We look forward to continued participation in this proceeding as the Commission evaluates the environmental consequences of the proposed Project surrender and associated federal actions.

Sincerely,

A handwritten signature in black ink that reads "Scott Harding". The signature is written in a cursive, slightly slanted style.

Scott Harding
Pacific Rivers Program Director
American Whitewater

Certificate of Service

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 21st day of July 2026.

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