



"A Voice for Salmon"
365 Days a Year

September 17, 2026

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

Via e-filing

Re: Potter Valley Hydroelectric Project – FERC Docket No. P-77-332

Comments of the Golden State Salmon Association on Scoping for the Environmental Review of PG&E's Application for Surrender of License and Decommissioning

Dear Secretary Reese:

The Golden State Salmon Association (GSSA) represents commercial and recreational salmon fishermen, seafood businesses, tribal partners, and salmon advocates working to restore California's salmon runs for their economic, cultural, and ecological value. Our members depend directly on healthy, fishable salmon populations up and down the California coast, and we have a direct stake in how the Commission resolves the future of the Potter Valley Hydroelectric Project. We submit these comments in response to the Commission's scoping notice for the environmental review of Pacific Gas and Electric Company's (PG&E) application to surrender its license and decommission Scott Dam and Cape Horn Dam.

GSSA strongly supports removal of Scott Dam and Cape Horn Dam, and we urge the Commission to complete its environmental review and move this process toward a final decision without unnecessary delay. As the Commission's own Scoping Document already recognizes, dam removal is the only viable path forward for this Project. Continued operation of the Project is foreclosed by PG&E's business decision to cease operation of the facilities because of ongoing economic losses. FERC cannot require PG&E to operate facilities it no longer wants to operate. FERC cannot allow PG&E to leave the dams in place as they are ecologically damaging, especially to commercially and recreationally important Chinook salmon and steelhead, and for public safety. Scott Dam is a high-hazard dam located atop the Bartlett Springs Fault Zone, a fault capable of producing a magnitude 7 earthquake. GSSA agrees that FERC must rule out retention of Scott and Cape Horn Dams, and we write to underscore why that conclusion matters as much to fishing families as it does to engineers and accountants.

Scott Dam Blocks Access to the Eel River's Best Cold-Water Habitat

The Eel River was once California's third-largest salmon and steelhead producer, behind only the Sacramento and Klamath systems. Its Chinook run alone was historically the fourth-largest wild Chinook run in the continental United States, with returns once estimated as high as 800,000 adult fish. Today, that run has collapsed to a small fraction of its historic size. Scott Dam has blocked anadromous fish from headwater habitat in the upper Eel and its tributaries for over a century – water that today remains among the coldest and most resilient to a warming climate anywhere in the watershed.

GSSA's members have lived through what happens when California's rivers lose their cold-water habitat and flows: collapsed salmon runs, closed fishing seasons, and fishing families and coastal economies left to absorb the cost. We do not want to see the Eel repeat that trajectory when a fix is within reach. Removing Scott Dam would reopen the single largest block of unimpaired habitat available to any salmon or steelhead population on California's North Coast.

The Economic Cost of a Dammed Eel River Falls on Fishing Families Statewide, Not Just Locally

This is not only a North Coast issue. Under "weak stock management," ocean salmon fisheries from northern Oregon to San Francisco are regularly constrained, and in bad years closed, to protect the weakest intermingling stock in the mix. For decades, that weakest stock has often been Eel River-origin Chinook or Coho. Because California's salmon fisheries are managed as mixed-stock fisheries, a collapsed Eel River run does not just cost North Coast communities their own fish, it constrains harvest of healthier stocks from the Sacramento and Klamath systems as well. GSSA's statewide membership feels the effects of this Project regularly, when a weak-stock closure or reduction is triggered as a result of depressed numbers on the Eel.

The human impacts of the decline of salmon are large. The attached 2012 Southwick Report concludes that, when our salmon runs were healthier, the California salmon fishing industry supported \$1.4 billion in economic activity annually and 23,000 jobs. It found that fully restored salmon runs would support \$5.7 billion annually and 94,000 jobs. Today, our industry is threatened. During three years of closed commercial fishing, and only six days of recreational ocean fishing in the past three years, nearly all income and jobs from California salmon fishing were lost. Beyond these numbers, the collapse of salmon runs and the closure of salmon fishing has had devastating impacts on coastal communities, businesses and families. Salmon is a critical part of California's natural heritage that we are in danger of losing if we do not take bold action. Klamath Dam removal will help. GSSA is working hard to rebuild Central Valley salmon runs. Restoring Eel River salmon runs could also make a dramatic contribution to rebuilding and sustaining California's salmon runs and salmon fishing jobs.

FERC has long recognized that it is "in the broad public interest that electric utilities be allowed to divest themselves of unproductive, deteriorating, and/or hazardous facilities," and that the

Commission cannot compel a licensee to operate an unprofitable Project indefinitely. Continuing to operate Scott Dam would be an ongoing economic loss for both PG&E and the fishing families and communities whose livelihoods depend on the fish it blocks.

The Two-Basin Solution Answers the Legitimate Concerns Raised by Others in This Proceeding

We recognize that some parties in this docket have raised concerns about water supply reliability for the Russian River watershed. Those are legitimate concerns, and GSSA does not dismiss them; however, the locally negotiated Two-Basin Solution was built to address them. A new diversion facility replacing the current Project is intended to maintain a water supply to the Russian watershed while allowing PG&E to reduce its liabilities by removing Scott and Cape Horn Dams.

PG&E Should Be Held to Its Restoration and Mitigation Obligations

As with every dam decommissioning, we expect the environmental review to hold the licensee to firm, enforceable commitments – on sediment management, water quality during and after removal, and funding for the habitat restoration work needed to make the newly reopened reaches productive for fish, not just passable. We share the concern raised by others that the planned single-flush sediment release, while necessary, will cause short-term impacts downstream. A surrender order is only as good as the conditions attached to it, and those conditions should be judged by whether they deliver a river that can actually rebuild harvestable salmon runs, not merely a river with dams removed from it.

We also note that continued operation of the Project, including the annual licenses that have kept it running past its 2022 expiration, has already been the subject of litigation over unauthorized take of ESA-listed Chinook and steelhead. That history should inform how the Commission weighs any further delay in this proceeding. Every additional year the Project remains in place is another year of unlawful harm to listed fish and another year of foreclosed economic recovery for the fishing communities that depend on them.

Conclusion

California's salmon fishing industry has absorbed years of closures and disaster declarations while its rivers lost the cold water and habitat that salmon need to survive. The Potter Valley proceeding is a rare case where the science, the fishing and conservation communities, the affected local governments and tribes, and a workable plan for the water users involved are already aligned behind a solution. The Commission's own scoping analysis, the fishing industry, the conservation community have all reached the same conclusion that dam removal is necessary. GSSA urges the Commission to complete its environmental review on schedule, find that removal meets the broad public interest standard, approve the surrender of license, and allow removal of Scott Dam and modification of Cape Horn Dam to proceed without further delay.

Thank you for the opportunity to comment. Please contact us with any questions regarding these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'MBF' with a long horizontal stroke extending from the end.

Michael Frost
Executive Director

August 9, 2012

Mr. Richard Pool
Golden Gate Salmon Association
[REDACTED]

Dear Mr. Pool:

We looked into updating our previous economic impact estimates associated with recreational salmon fishing in California. Please accept this letter as a presentation of the best estimates available along with a description of the methodology and data sources used.

As described below, our data sources were the U.S. Department of Commerce's National Marine Fisheries Service and the California Department of Fish and Game. We sought to update our 2006 estimates to 2010/2011, but the data necessary to estimate the economic impacts of salmon harvests were not available for these years. Therefore, we will stick with the 2006 estimates which are summarized as:

	Sales Impact ¹	Jobs Impact
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Total 2004-2006 Commercial and Recreational Activity	\$1.4 billion	23,000
Estimate of the Future Returns if Salmon were Restored to their Full Potential	\$5.7 billion	94,000

Commercial Fisheries:

To estimate the potential impacts from a restored commercial salmon fishery, average landings for 2004 and 2005 were used as they represent rather steady harvests. Harvests began to decrease rapidly in 2006 down to practically nothing in 2008 and 2009. In 2004 and 2005, salmon on average represented 12% of the total value of California's commercial fisheries landings. Assuming the mark-ups and value added from salmon processing, distribution and retail were the same as for all other commercial fisheries in California as reported by NOAA, then the economic impacts for commercial salmon harvests at 'normal' 2004 and 2005 levels would have been:

¹ Sales impacts = Sales by California businesses.

Sales impacts (total sales that occur in the CA economy): \$1.17 billion
Income impacts (salaries/wages/benefits, sole proprietor earnings): \$608 million
Employment (full and part time): 21,480

All data for these commercial salmon impacts were not produced by Southwick Associates but instead were obtained directly from the National Marine Fisheries Service's (NMFS) annual report *Fisheries Economics of the United States, 2006* (Economic and Sociocultural Analysis Division, National Marine Fisheries Service, NOAA, Silver Spring, MD. 2007). The 2006 impacts provided in my estimates were not changed in any way as reported by NMFS. This source provided information on the number of fish harvested, the dollars per pound received by fishermen, and the economic impacts of these dollars, including the multiplier effects. These data were produced by NOAA Fisheries economists and statisticians. The commercial impact calculations were produced in a straightforward fashion. We assumed the impacts per fish would be the same as in 2006, and simply matched the impacts per pound with the total pounds harvested in 2004-05.

Looking back, salmon landings in 2004 and 2005 (6.06 million lbs) were well under historic landings from previous decades. If salmon can be re-established to historic levels, annual commercial harvests could realistically reach 25 million pounds. At such levels, assuming no change in the economic impacts per pound of fish landed from current levels, economic impacts from commercial salmon landings could reach:

Sales impacts (total sales that occur in the CA economy): \$4.83 billion
Income impacts (salaries/wages/benefits, sole proprietor earnings): \$2.51 billion
Employment (full and part time): 88,672

Recreational Fisheries:

Recreational impacts were produced using several sources. The number of salmon fishing trips in California in 2006 was measured by the California Department of Fish and Game via its *California Recreational Fisheries Survey* (CRFS). This same data source reported the total number of recreational fishing trips for salmon and all other species combined. With these data, we estimated the percentage of all California marine recreational fishing attributable to salmon.

The economic impacts generated by each marine sportfishing trip in California were also obtained directly from the National Marine Fisheries Service's (NMFS) *Fisheries Economics of the United States, 2006*. Just like the

commercial fisheries data, the impact information including multipliers obtained from NMFS were not changed in any way. We matched the two data sources to estimate impacts attributable to recreational salmon fishing.

Economic impacts were not available specifically for salmon fishing. Instead, they were only available by fishing method such as fishing from a boat or from shore. Considering most salmon fishing is done from boats, we first determined the impacts generated by California marine anglers using boats. Next, an adjustment was made to account only for boat trips targeting salmon. According to CRFS, in 2004 and 2005, 14.82% of California's marine boat fishing trips targeted salmon. Assuming the economic impacts per trip are consistent regardless of species targeted, the economic impacts associated with salmon trips would have been expected to average approximately:

Total sales impacts (total sales that occur in the CA economy): \$204.8 million

Value-added impacts (salaries/wages/benefits, proprietors & property income, dividends, excise & sales taxes): \$107.2 million

Employment (full and part time): 1,345

Just like the commercial fisheries analysis presented earlier, the recreational analysis is based on 2004-2005 data. A healthy, well-managed fishery would reasonably be expected to allow for additional recreational fishing trips. If recreational fisheries could also increase by the same amount as commercial landings as described above (4.13 times greater than 2004-05 levels), and assuming the impacts for the additional trips remain consistent, the economic impacts could reach up to:

Total sales impacts (total sales that occur in the CA economy): \$845.8 million

Value-added impacts (salaries/wages/benefits, proprietors & property income, dividends, excise & sales taxes): \$442.7 million

Employment (full and part time): 5,555

Combined Commercial and Recreational Impacts:

By adding the result for the commercial and recreational analyses above, California had nearly 23,000 jobs related to salmon, and nearly \$1.4 billion in economic activity:

	<u>Sales Impacts</u>	<u>Jobs:</u>
Commercial	\$ 1.170 billion	21,480
Recreational	\$ 205 million	1,345
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Total	\$1.375 billion	22,825

If historical salmon harvests could be reached again, the impacts would increase significantly:

	<u>Sales Impacts</u>	<u>Jobs:</u>
Commercial	\$ 4.830 billion	88,672
Recreational	\$ 846 million	5,555
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Total	\$5.676 billion	94,227

We expect the former 2004-05 levels to be more realistic, but the latter results may hopefully encourage California to strive for greater habitat restoration goals.

If you have any questions, please do not hesitate to let me know. Thank you.

Sincerely,



Rob Southwick ,
President