September 29, 2026

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

Re: Public Comment — Potter Valley Hydroelectric Project, Application for Surrender of License and Non-Project Use of Project Lands (FERC Docket P-77-332)

Dear Secretary Reese and Commissioners:

California Four Wheel Drive Association (Cal4Wheel) submits these supplemental scoping comments concerning the Federal Energy Regulatory Commission's environmental review of Pacific Gas and Electric Company's proposed surrender and decommissioning of the Potter Valley Hydroelectric Project, FERC Project No. 77-332.

These comments supplement Cal4Wheel's prior comments regarding the extraordinary recreational, socioeconomic, water-supply, wildfire-response, ecological, and public-interest consequences associated with removal of Scott Dam and elimination of Lake Pillsbury. Cal4Wheel continues to urge preservation of Scott Dam and Lake Pillsbury. Our purpose in this supplemental submission, however, is more specifically directed to the scope, methodology, alternatives, data, and environmental consequences that FERC must meaningfully evaluate before deciding whether surrender and decommissioning should proceed in the manner proposed by PG&E.

That distinction is consequential. PG&E filed its surrender application and decommissioning plan in July 2025, and FERC issued Scoping Document 1 on May 22, 2026. FERC's present process is intended to identify the environmental consequences, alternatives, and information necessary to support the Commission's ultimate decision. The extended scoping process therefore presents precisely the appropriate opportunity to ensure that the environmental review is not artificially confined to demolition activities, sediment management, fish passage, or the physical footprint of project facilities while treating the elimination of a 2,280-acre reservoir and its associated human environment as a secondary consideration (Federal Energy Regulatory Commission [FERC], 2026; Pacific Gas and Electric Company [PG&E], 2025).

Cal4Wheel urges FERC to prepare an Environmental Impact Statement (EIS) and to evaluate, with comparable rigor, both the anticipated benefits and the foreseeable adverse consequences of the proposed action. Lake Pillsbury is the Mendocino National Forest's largest lake and has roughly 31 miles of shoreline. It is simultaneously a reservoir, recreation destination, camping hub, motorized-access anchor, wildlife resource, wildfire-response asset, component of an interstate federal public land management landscape, and element of a water system upon which agricultural and downstream communities have relied for generations (U.S. Forest Service [USFS], 2025a).

The environmental baseline cannot reasonably be defined as though those existing uses and values disappear merely because PG&E has elected to surrender its hydropower license.

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I. FERC SHOULD PREPARE AN ENVIRONMENTAL IMPACT STATEMENT

Cal4Wheel requests preparation of an EIS capable of transparently quantifying the proposed action's significant effects on recreation, public access, visitor displacement, wildfire suppression, water availability, agriculture, rural economies, habitat, wildlife, water quality, geomorphology, public safety, and the human environment.

NEPA requires environmental review to focus upon the environmental effects of the proposed federal action and reasonable alternatives to that action. The Supreme Court recently reaffirmed that NEPA is procedural rather than outcome determinative and that agencies possess substantial discretion concerning the depth and breadth of environmental analysis. At the same time, this legal precedent (*Seven County Infrastructure Coalition v. Eagle County*) did not eliminate the obligation to examine significant environmental effects of the project actually before the agency. The Court expressly recognized that an EIS addresses significant environmental effects of a proposed project and identifies feasible alternatives capable of mitigating those effects (*Seven County Infrastructure Coalition v. Eagle County*, 605 U.S. ___, 2025).

That distinction strongly favors a comprehensive examination of this proposed action: removal of Scott Dam. The disappearance of Lake Pillsbury is not a remote effect of some separate project over which FERC has no authority. It is a direct physical consequence of the proposed removal of Scott Dam. Likewise, the loss of reservoir recreation, displacement of visitors, conversion of the existing reservoir footprint, alteration of water availability, loss of an existing wildfire-suppression water source, and changes to the recreation setting surrounding the reservoir arise from the action FERC is reviewing. An EIS should therefore evaluate these effects as components of one interconnected human and natural environment rather than partitioning the analysis into isolated resource categories that obscure their cumulative practical consequences.

The central analytical question is not simply what happens at Scott Dam when concrete is removed. It is what happens to the Lake Pillsbury landscape, the surrounding National Forest recreation system, affected communities, water users, public safety resources, and environmental conditions when Lake Pillsbury ceases to exist.

That is the relevant environmental comparison.

II. FERC MUST FULLY EVALUATE THE NO-ACTION ALTERNATIVE AND REASONABLE LAKE-PRESERVATION ALTERNATIVES

Cal4Wheel urges FERC to develop a genuine alternatives analysis rather than an environmental document in which dam removal is effectively predetermined and alternatives differ primarily in the means, timing, or mechanics of demolition. FERC should fully analyze the **No Action Alternative** and all reasonable alternatives within the Commission's authority that could preserve Lake Pillsbury for continued public benefit. The analysis should address, as appropriate, continued operation, transfer to another qualified owner or operator, rehabilitation or structural modification, seismic retrofit, operational changes, reduced or modified hydropower operations, phased improvements, alternative financing or ownership

structures, and combinations of infrastructure modification and fish-passage measures. These alternatives should be examined on their actual merits, with comparable engineering, environmental, economic, and operational information. FERC should not subject preservation alternatives to exacting feasibility requirements while accepting uncertainty concerning the long-term ecological, geomorphic, socioeconomic, and recreational consequences of dam removal.

This issue has acquired additional significance since Cal4Wheel's original comments.

Secretary of Agriculture Brooke Rollins formally intervened in the Potter Valley proceeding in December 2025 and urged FERC to reject PG&E's surrender application. In April 2026, Secretary Rollins publicly reported interest by the Elsinore Valley Municipal Water District in acquiring the project and continuing operation of Scott and Cape Horn Dams. Subsequent public records confirm federal discussions involving the Departments of Agriculture and Interior regarding the potential acquisition and continued operation of Potter Valley Project infrastructure (Rural County Representatives of California [RCRC], 2026; U.S. House Committee on Natural Resources, 2026).

Those developments do not establish that transfer is feasible, nor does Cal4Wheel suggest that FERC should presume that they do. Elsinore Valley Municipal Water District itself reportedly characterized its interest as exploratory, and substantial legal, engineering, financial, seismic, tribal-rights, fisheries, and operational questions remain unresolved (Russian River Flood Control & Water Conservation Improvement District [RRFC], 2026a). But those uncertainties are precisely why **transfer and continued-operation alternatives warrant objective analysis rather than summary dismissal**.

FERC's environmental review should disclose what would actually be required to preserve Scott Dam and Lake Pillsbury: capital improvements, seismic remediation, ownership arrangements, operating costs, fish-passage requirements, water rights, regulatory approvals, and potential federal, state, local, or private participation. Only then can the Commission and public compare preservation against demolition on a common evidentiary basis.

III. LAKE PILLSBURY MUST BE ANALYZED AS THE RECREATIONAL HUB OF A MUCH LARGER PUBLIC-LANDS LANDSCAPE

Cal4Wheel particularly urges FERC to substantially expand its recreation analysis. Lake Pillsbury is not merely a reservoir at which discrete water-based recreation occurs. It operates as a destination anchor for a geographically extensive recreation system encompassing OHV travel, four-wheel-drive touring, dispersed camping, developed camping, hunting, fishing, boating, hiking, equestrian use, wildlife viewing, scenic travel, and multi-day backcountry recreation.

The Mendocino National Forest identifies Lake Pillsbury as its largest lake, encompassing 2,280 surface acres and 31 miles of shoreline (USFS, 2025a). The reservoir and surrounding Forest lands support developed campgrounds, day-use opportunities, dispersed recreation, water access, and connections to the surrounding road and trail system.

For OHV recreation specifically, the scale is substantial. The Forest Service identifies more than 135 miles of system trails and roads within the Upper Lake Ranger District OHV area. In the Lake Pillsbury

basin context itself, the agency separately identifies 33 miles of trail, noting that many are four-wheel-drive trails (USFS, 2025b, 2025c). These are not abstract mileage statistics. They describe an integrated recreation landscape in which visitors can establish a base camp near Lake Pillsbury and participate in multiple recreation activities during a single trip.

Cal4Wheel's prior comments specifically documented this relationship and explained that the reservoir functions as a destination node supporting trail use, staging, camping basecamps, and multi-day family recreation. FERC should now carry that issue forward into a substantially more sophisticated recreational analysis. Recreation displacement is an environmental effect, not an accounting exercise. Eliminating Lake Pillsbury will not cause every existing visitor simply to cease recreating. A significant portion of that demand can reasonably be expected to relocate.

Visitors displaced from Lake Pillsbury may seek substitute opportunities at other Mendocino National Forest campgrounds, trailheads and dispersed recreation sites; elsewhere within the Upper Lake Ranger District; at Lake Mendocino; along the Russian River; or at other regional reservoirs and public lands. The environmental consequences of displacement can include increased vehicle travel, congestion, parking demand, sanitation pressure, unauthorized dispersed camping, trail crowding, conflicts among recreation classes, wildfire ignition exposure, emergency-response demand, shoreline pressure, and accelerated maintenance requirements. FERC therefore should not measure recreational effects merely by counting campsites or acres inundated under existing conditions. It should evaluate the recreation system.

The analysis should determine existing visitation, seasonal use patterns, campground occupancy, OHV use, dispersed-camping demand, boating and fishing use, length of stay, peak-weekend demand, visitor origin, and the availability and capacity of reasonable substitute destinations.

Where route-specific visitation data do not exist, that absence should not be converted into a conclusion of insignificant impact. FERC should employ National Visitor Use Monitoring information, campground reservation and occupancy records, traffic counts, Forest Service recreation data, OHV program information, mobile-device visitation datasets where methodologically appropriate, visitor surveys, county tourism information, and defensible recreation-demand modeling.

The appropriate question is not simply how many people currently visit a particular trail. It is how elimination of the destination around which those trails function will change use of the entire recreation network.

IV. FERC MUST EXAMINE CUMULATIVE RECREATIONAL PRESSURE ON SURROUNDING PUBLIC LANDS

The geographic scope of the recreation analysis should extend far enough to capture reasonably foreseeable displacement directly resulting from the loss of Lake Pillsbury. Particular attention should be directed to Lake Mendocino, Russian River recreation sites, adjacent Mendocino National Forest recreation areas, and other regional camping and OHV destinations that offer plausible substitutes. For each, FERC should evaluate existing visitor capacity against foreseeable displaced demand. This should include campground occupancy, parking and staging capacity, sanitation infrastructure, road capacity and condition, trail maintenance, law-enforcement demand, search-and-rescue capacity,

emergency medical access, wildfire evacuation capability, and environmental stress associated with concentrated recreation.

This is particularly important for OHV recreation because designated motorized opportunities cannot simply be recreated anywhere users choose. Travel-management designations confine motorized use to particular roads, trails, and areas. Consequently, displacement from one established recreation hub can concentrate use on a finite designated network elsewhere. A conclusion that visitors can "recreate elsewhere" would therefore be analytically inadequate unless FERC identifies **where**, establishes that substitute capacity actually exists, and analyzes the environmental and public-safety consequences of transferring that demand.

V. THE EIS MUST EXAMINE LOSS OF DEVELOPED AND DISPERSED CAMPING AS PART OF THE SAME RECREATION SYSTEM

Camping warrants distinct treatment because it is the mechanism that makes many Lake Pillsbury recreation experiences possible.

For four-wheel-drive families and other visitors traveling significant distances, Lake Pillsbury is not merely a place visited for several hours. Camping converts the area into a multi-day destination and permits users to combine trail riding, scenic travel, boating, fishing, hunting, hiking, and family recreation. Removal of the lake would alter the attractiveness and functional utility of developed and dispersed camping even where individual camping sites are not physically excavated. FERC should therefore quantify:

- existing developed campground inventory and occupancy;
- dispersed camping patterns around the basin;
- seasonality and peak-use periods;
- average visitor length of stay;
- dependence of campground demand upon lake recreation;
- potential campground closures, relocations, or loss of utility following reservoir removal;
- displacement to undeveloped locations;
- sanitation, waste, fire, and resource impacts from redistributed dispersed camping; and
- consequences for OHV staging and multi-day trail use.

The analysis must recognize functional loss, not merely physical destruction.

VI. THE SOCIOECONOMIC ANALYSIS SHOULD FOLLOW THE ENVIRONMENTAL CONSEQUENCES ACROSS THE AFFECTED REGION

Cal4Wheel urges FERC to conduct a comprehensive socioeconomic analysis tied to the environmental changes produced by the proposed action, including relevant effects within Lake, Mendocino, Sonoma, and Humboldt Counties. The analysis should not be confined to PG&E's costs or temporary demolition employment.

Lake Pillsbury supports spending associated with camping, fuel, groceries, vehicle supplies, lodging, marina activity, boating, fishing, OHV recreation, hunting, and other visitor expenditures. Cal4Wheel's

prior comments also identified Lake County's concern that elimination of Lake Pillsbury could significantly reduce tourism revenue and produce county fiscal losses associated with property values and project-related revenues. The EIS should quantify, to the extent supported by available data, effects upon recreation-dependent businesses, gateway communities, Forest Service visitation, local employment, county tax bases, property values, emergency services, road maintenance, public services, and visitor expenditures.

Importantly, the analysis should distinguish temporary economic activity created by demolition from permanent economic changes caused by loss of the reservoir. Short-term construction expenditures cannot rationally be treated as equivalent to the continuing annual value of a recreation asset or the long-term economic productivity associated with water-supported agriculture.

Potter Valley Irrigation District reports that family farms within Potter Valley produce wine grapes, pears, cattle, sheep, and other agricultural products valued at more than $34 million. That economic activity demonstrates the broader significance of water reliability to the regional human environment (Potter Valley Irrigation District [PVID], 2026).

FERC should evaluate the proposed action across appropriate time horizons, including 10-, 25-, and 50-year periods, rather than allowing temporary deconstruction expenditures to obscure enduring changes in recreation, agriculture, property values, public services, and rural economic activity.

VII. WATER SUPPLY AND AGRICULTURAL CONSEQUENCES REQUIRE FULL ANALYSIS

Scott Dam and Lake Pillsbury exist within a water-management system upon which communities and agricultural users have relied for generations. The environmental review should accurately distinguish between Lake Pillsbury storage, existing Potter Valley Project diversions, proposed future diversions through the New Eel-Russian Facility, Lake Mendocino storage, groundwater interaction, and local domestic-water dependence. We are asking FERC to disclose, quantitatively, what is lost, what is replaced, what remains uncertain, and who bears the consequences. FERC should model wet, median, dry, and critically dry hydrologic conditions and evaluate how removal of reservoir storage changes system resilience under each.
Particular attention should be directed to agricultural water security, domestic wells, drought buffering, seasonal water availability, and the degree to which any proposed replacement infrastructure actually reproduces the functions presently supplied by storage.

A diversion structure is not necessarily equivalent to a reservoir. That distinction must remain explicit throughout the EIS.

VIII. WILDFIRE SUPPRESSION AND WILDFIRE RISK REQUIRE A DEDICATED OPERATIONAL ANALYSIS

The wildfire consequences deserve substantially greater scrutiny than a conventional recreation or public-safety subsection. Lake Pillsbury exists within a remote, heavily vegetated, fire-prone landscape. Its utility as a large, immediately available water body therefore has significance not only for residents, but for National Forest visitors, firefighters, adjacent communities, wildlife habitat, and watershed protection.

Cal4Wheel's original comments identified the reservoir's role as a static firefighting water source and specifically requested analysis of aerial and helicopter suppression, response time, water availability, and the operational consequences of eliminating that resource.

The EIS should go considerably further. FERC should consult directly with the Forest Service, CAL FIRE, Lake County, Mendocino County, local fire protection districts, emergency managers, and aerial firefighting professionals. The analysis should determine which aircraft can currently use Lake Pillsbury, typical turnaround or cycle times, alternative dip or refill locations, seasonal availability of those alternatives, response-time differentials, road-based water supply alternatives, and the effect of losing the reservoir during simultaneous or large-scale wildfire incidents.

The analysis should also address the secondary environmental consequences of reduced suppression capability. A fire that becomes larger because suppression resources must travel farther for water can produce additional habitat loss, soil sterilization, erosion, sediment loading, road damage, carbon emissions, recreation closures, infrastructure damage, and threats to human life. These consequences should not be dismissed merely because the ignition itself would not be caused by dam removal. The relevant inquiry is whether eliminating a major existing suppression resource materially changes the environmental consequences and operational response to wildfire within the affected landscape.

IX. WILDLIFE AND HABITAT ANALYSIS MUST ADDRESS WHAT IS LOST AS WELL AS WHAT MAY BE RESTORED

Cal4Wheel recognizes that restoration of anadromous fish passage is a principal objective advanced by proponents of Scott Dam removal. That anticipated benefit warrants rigorous scientific analysis. But NEPA analysis cannot begin with the assumption that conversion from reservoir to riverine habitat constitutes an unqualified ecological benefit. Lake Pillsbury has existed for more than a century. During that period, reservoir, shoreline, wetland, riparian, and adjacent terrestrial habitat conditions have developed around the impoundment. Wildlife presently using those habitats exists within the environmental baseline. FERC should inventory species and habitat associated with the existing reservoir and evaluate the magnitude, duration, and certainty of habitat losses following drawdown. Analysis should encompass aquatic species, amphibians, reptiles, waterfowl, raptors, mammals, riparian vegetation, wetlands, and other reservoir-associated ecological communities.

The EIS should then compare those losses against projected benefits to salmonids and other riverine species using transparent assumptions and realistic recovery timelines. The analytical framework should not compare existing measurable reservoir habitat against assumed instantaneous future river habitat. Ecological transition takes time, and its trajectory may be influenced by sediment, invasive vegetation, drought, wildfire, erosion, water temperature, geomorphic adjustment, and climate variability.

X. RESERVOIR SEDIMENT, GEOMORPHOLOGY, WATER QUALITY, AND POST-REMOVAL LANDSCAPE CONDITIONS REQUIRE LONG-TERM ANALYSIS

The physical conversion of Lake Pillsbury from reservoir to river corridor is itself a major landscape-scale environmental action. FERC should quantify the volume, composition, spatial distribution, and contaminant characteristics of accumulated sediment and evaluate how various drawdown and removal

scenarios affect sediment mobilization. The EIS should address turbidity, downstream deposition, channel migration, bank erosion, slope instability, nutrient mobilization, water temperature, invasive plants, dust from exposed reservoir sediments, revegetation success, and long-term geomorphic adjustment. Analysis should not terminate when demolition ends. FERC should identify expected conditions at meaningful intervals, such as immediately following drawdown and approximately 1, 5, 10, 25, and 50 years thereafter. Where predictions are uncertain, the EIS should disclose the range of plausible outcomes rather than presenting a single modeled trajectory as inevitable.

XI. ACCESS, ROADS, AND TRAILS MUST BE ANALYZED AS PHYSICAL INFRASTRUCTURE AND AS A FUNCTIONAL NETWORK

Lake Pillsbury's relationship to the Mendocino National Forest transportation system is especially important to Cal4Wheel. The M1 corridor north of Lake Pillsbury and associated National Forest routes provide access for four-wheel-drive recreation, scenic touring, hunting, camping, trail access, administrative activity, emergency response, and resource management (USFS, 2025d). The EIS should inventory all roads, trails, staging areas, campgrounds, trailheads, bridges, crossings, and access points potentially affected directly or functionally by decommissioning.

The analysis should address whether changes in river morphology, erosion, sediment, bridge requirements, maintenance priorities, campground demand, or visitor redistribution could lead to future road restrictions or closures. A road need not be physically inundated or excavated to suffer an environmental consequence. If elimination of the reservoir changes its maintenance viability, destination connectivity, emergency function, or recreational utility, that effect belongs in the analysis.

XII. FEDERAL INTERAGENCY INTEREST MAKES A BROAD, TECHNICALLY ROBUST RECORD ESPECIALLY IMPORTANT

The Potter Valley Project is no longer appropriately characterized as a dispute involving only PG&E, FERC, fisheries interests, and downstream water users. Federal interest has materially expanded. Secretary Rollins' December 2025 intervention and subsequent efforts concerning possible continued operation demonstrate that the federal government itself contains differing institutional perspectives regarding the future of the project. Public reporting and congressional correspondence further document engagement by Interior Secretary Doug Burgum concerning potential preservation and transfer of project infrastructure (U.S. House Committee on Natural Resources, 2026).

Meanwhile, the Bureau of Reclamation is the nation's largest wholesale water supplier and the second-largest producer of hydroelectric power. Aubrey Bettencourt currently serves as Principal Deputy Commissioner, exercising delegated authority of the Commissioner, and her official biography emphasizes Western water, agriculture, hydropower, and infrastructure issues (Bureau of Reclamation, 2026).

Cal4Wheel urges FERC to obtain substantive input from Reclamation regarding reservoir-storage functions, infrastructure rehabilitation, water-supply resilience, hydropower feasibility, agricultural water implications, and any technically plausible preservation or transfer alternative within its expertise.

The significance of these federal developments is not that one executive-branch position should dictate FERC's decision. It is that **credible federal interest in continued operation reinforces the need for an environmental record capable of comparing continued operation and dam removal rather than presuming that only the latter warrants detailed engineering analysis.**

XIII. FERC SHOULD FAIRLY ADDRESS COMPETING TRIBAL, FISHERIES, AND RIVER-RESTORATION INTERESTS

A comprehensive EIS must also acknowledge that the Potter Valley Project presents genuine competing interests.

The Round Valley Indian Tribes and other tribal and fisheries interests have raised substantial concerns regarding fish passage, Eel River restoration, tribal water rights, and effects of the existing dams. Proponents of removal contend that removing Scott Dam would reopen upstream habitat to salmon and steelhead and advance restoration of a free-flowing Eel River. Those interests are properly part of FERC's analysis. Cal4Wheel's position does not suggest that FERC should disregard them. It requires the opposite: **compare all consequences on a common evidentiary basis.**

Fisheries benefits should be quantified where possible. Their probability, timing, limiting factors, and dependence upon other watershed conditions should be disclosed. The same standard should apply to recreation losses, water-supply effects, wildfire consequences, agricultural impacts, reservoir habitat losses, and socioeconomic changes. Environmental review is most valuable when it exposes tradeoffs rather than presuming them away.

XIV. THE EIS SHOULD DISTINGUISH IMPACTS THAT CAN BE MITIGATED FROM IRRETRIEVABLE LOSSES

A particularly important analytical distinction is between impacts that can be mitigated after dam removal and resources that cannot realistically be replaced. Temporary construction noise can be mitigated. Road damage can potentially be repaired. Some vegetation can be replanted. But a 2,280-acre National Forest lake cannot simply be "mitigated" through interpretive signage, a replacement trail, or enhancement of another recreation site. Likewise, the value of a large water body for boating, shoreline camping, fishing, scenic recreation, wildfire suppression, and as an organizing hub for surrounding motorized recreation is geographically specific.

FERC should therefore identify irreversible and irretrievable losses separately from effects for which mitigation can reasonably provide functional replacement. Where PG&E or another party proposes mitigation for loss of a recreation opportunity, FERC should ask whether the mitigation replaces the function and capacity of the resource lost, rather than merely whether some mitigation measure has been proposed.

XV. REQUESTED SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT

For clarity, Cal4Wheel requests that FERC structure the NEPA review to accomplish the following:

1. **Prepare an Environmental Impact Statement** that transparently quantifies the direct and reasonably foreseeable environmental consequences of eliminating Lake Pillsbury, including recreation, motorized access, camping, visitor displacement, socioeconomic conditions, water reliability, agriculture, wildfire suppression, public safety, wildlife, habitat, water quality, sediment, geomorphology, and long-term landscape conversion.
2. **Fully evaluate the No Action Alternative and all reasonable alternatives that could preserve Lake Pillsbury for public benefit**, including continued operation, transfer to another qualified entity, structural or seismic rehabilitation, operational modifications, phased improvements, fish-passage measures, alternative ownership arrangements, and other technically feasible configurations. The alternatives should receive comparable engineering and economic analysis rather than being dismissed through unequal assumptions.
3. **Conduct a comprehensive recreation analysis that treats Lake Pillsbury as a regional recreation hub**, including its relationship to the approximately 33 miles of trails identified in the Lake Pillsbury context, more than 135 miles of system trails and roads in the Upper Lake OHV network, developed and dispersed camping, boating, fishing, hunting, hiking, scenic travel, and multi-day recreation.
4. **Analyze recreation displacement and cumulative pressure on surrounding public lands and recreation resources**, including plausible effects upon Lake Mendocino, Russian River recreation sites, Mendocino National Forest roads and trails, campgrounds, dispersed camping areas, visitor capacity, sanitation, law enforcement, search and rescue, wildfire ignition exposure, evacuation, and public safety.
5. **Conduct a comprehensive socioeconomic analysis tied to the environmental changes resulting from the proposed action**, addressing relevant consequences within Lake, Mendocino, Sonoma, and Humboldt Counties, including recreation-dependent businesses, gateway communities, Forest Service visitation, agricultural production, employment, public services, county revenues, property values, and the permanent loss of recreation-related economic activity.
6. **Conduct a dedicated wildfire-suppression and emergency-response analysis** developed with the Forest Service, CAL FIRE, affected counties, local fire districts, and aerial firefighting professionals, quantifying alternative water-source distances, aircraft cycle times, response effects, seasonal water availability, evacuation consequences, and secondary environmental effects associated with diminished suppression capability.
7. **Analyze reservoir-associated wildlife and habitat as part of the existing environmental baseline** and compare those losses objectively with anticipated riverine and fisheries benefits, including realistic transition periods and uncertainty.
8. **Conduct long-term sediment, geomorphic, water-quality, invasive-species, revegetation, and exposed-reservoir-bed analyses**, including conditions extending decades beyond physical demolition.
9. **Analyze the functional effects on roads, trails, campgrounds, staging areas, and recreation access**, rather than limiting the inquiry to infrastructure directly demolished or inundated.
10. **Consult relevant federal agencies with expertise in water storage, agriculture, National Forest recreation, wildfire response, hydropower, fish and wildlife, and infrastructure**, including the Forest Service, Bureau of Reclamation, U.S. Fish and Wildlife Service, and other appropriate agencies.

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11. **Clearly distinguish impacts that can actually be mitigated from irreversible losses**, and require mitigation to be evaluated according to functional equivalency rather than nominal replacement.
12. **Use transparent assumptions, disclose data gaps, and subject benefits and adverse impacts to equivalent evidentiary standards.** Uncertainty concerning adverse impacts should not be treated as evidence that no significant impact exists.

CLOSING

Cal4Wheel continues to urge preservation of Scott Dam and Lake Pillsbury. But at this stage of the proceeding, an equally immediate concern is ensuring that FERC does not make an irreversible decision from an environmental record that defines the project too narrowly. Lake Pillsbury is not simply water behind a dam. It is the Mendocino National Forest's largest lake; an anchor for developed and dispersed camping; a destination supporting OHV, four-wheel-drive, boating, fishing, hunting, hiking, and family recreation; an organizing feature within a network containing more than 135 miles of OHV roads and trails; a component of regional water infrastructure; a resource relied upon in a landscape exposed to severe wildfire; habitat for existing wildlife communities; and an economic asset supporting rural communities and recreation-dependent activity.

Eliminating that resource would produce consequences extending far beyond the physical footprint of Scott Dam.

Cal4Wheel therefore urges FERC to prepare an EIS capable of answering the central question before the Commission: not merely how Scott Dam can be removed, but whether removal, after accounting for the complete environmental and human consequences and reasonable alternatives, represents an adequately informed disposition of this nationally significant public resource.

The emergence of federal interest in alternatives that could retain the Potter Valley Project further demonstrates why preservation alternatives should receive substantive analysis rather than cursory treatment. Secretary Rollins' intervention and subsequent federal discussions do not predetermine FERC's decision. They do, however, reinforce that continued operation or transfer cannot reasonably be dismissed as an option unworthy of rigorous examination before an irreversible demolition decision is made.

Once Scott Dam is destroyed and Lake Pillsbury disappears, the Commission cannot recreate a century of developed recreational use, established habitat, water-storage functionality, wildfire-response utility, or the communities and recreation patterns that have developed around the reservoir. The purpose of environmental review is to inform the decision **before** that irretrievable commitment is made. Cal4Wheel therefore urges FERC to use this extended scoping process to develop an environmental review commensurate with the magnitude and permanence of the decision before it, and to preserve a meaningful range of alternatives until the environmental, engineering, recreational, economic, and public-safety record is complete.

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Thank you for considering these supplemental comments. Please include this letter and Cal4Wheel's prior submission in the administrative record for FERC Project No. 77-332.

Sincerely,

Rose Winn
Natural Resources Consultant
California Four Wheel Drive Association

References

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U.S. Forest Service, Mendocino National Forest. (2025a). *Lake Pillsbury.* [The original Cal4Wheel submission documents the Forest Service's approximately 2,280-acre surface-area and 31-mile shoreline figures.]

U.S. Forest Service, Mendocino National Forest. (2025b). *Upper Lake Recreation Area.* [More than 135 miles of system trails and roads.]

U.S. Forest Service, Mendocino National Forest. (2025c). *Upper Lake Recreation Area: Lake Pillsbury basin OHV information.* [Approximately 33 miles of trail north of the basin, many identified as four-wheel-drive trails.]

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