



December 19, 2025

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 Project No. 77-332)

Dear Secretary Reese and Commissioners:

California Four Wheel Drive Association (Cal4Wheel) submits these comments to urge the Federal Energy Regulatory Commission (FERC) to preserve Lake Pillsbury by rejecting any surrender/decommissioning outcome that removes Scott Dam and eliminates the reservoir. Cal4Wheel is a statewide, nonprofit recreation advocacy organization representing responsible four-wheel drive and off-highway vehicle (OHV) users and families across California. Our members recreate throughout the Mendocino National Forest and Lake County, including the Lake Pillsbury basin, where motorized access supports a broad spectrum of high-value, low-impact outdoor recreation, including OHV trail riding and overlanding, dispersed camping, family camping, boating, fishing, hunting access, hiking, and nature viewing. Lake Pillsbury is not an incidental byproduct of an aging facility - it is a core public resource that supports rural communities, regional recreation economies, water reliability, and wildfire response capacity.¹²

PG&E's proposal to remove Scott Dam would drain Lake Pillsbury (the Mendocino National Forest's largest lake) and irreversibly transform the area's recreation, access, community stability, and emergency response infrastructure.³ The record demonstrates that ending storage at Scott Dam carries foreseeable, unavoidable adverse impacts to water reliability, agriculture, and recreation, including downstream Russian River interests.⁴ FERC's decision must squarely confront those impacts, quantify them transparently, and avoid an outcome that externalizes massive costs onto the public while eliminating a century-old multipurpose benefit.

LAKE PILLSBURY IS A HIGH-VALUE PUBLIC RECREATION ANCHOR, NOT A MARGINAL AMENITY

Lake Pillsbury is widely recognized as the Mendocino National Forest's largest lake, with approximately 2,280 acres of surface area and 31 miles of shoreline, supporting a wide variety of recreation opportunities and developed recreation sites.³ The Lake Pillsbury Alliance describes Lake Pillsbury as a destination where thousands of visitors come annually for remote outdoor recreation including camping, boating, hunting, and fishing.¹

Recreation at Lake Pillsbury is not a niche use. It is a key "hub" that concentrates and organizes recreation in a manner that reduces dispersed user conflicts elsewhere. A functioning reservoir:

- Supports developed campgrounds and day use as well as dispersed camping opportunities in the surrounding Mendocino National Forest;³



- Supports boating access and a marina economy (seasonal), including rentals and a launch ramp;⁵
- Sustains fisheries that drive repeat visitation (bass and trout are consistently cited as draw species).¹³

Removing the dam does not merely “change recreation.” It eliminates lake-based recreation and permanently alters access patterns and destination value. Even proponents concede this is a profound shift; PG&E’s own public-facing materials acknowledge a decommissioning pathway that removes Scott Dam would end the reservoir condition.⁶

**LAKE PILLSBURY IS ESSENTIAL TO OHV RECREATION,
DISPERSED CAMPING ACCESS, AND MOTORIZED ROUTE CONNECTIVITY**

I. Documented OHV mileage proximate to Lake Pillsbury

The Upper Lake Ranger District’s OHV program is among the most significant motorized recreation resources in Northern California. The Mendocino National Forest Upper Lake Ranger District OHV area provides more than 135 miles of system trails and roads.⁷ The Forest Service specifically describes the Lake Pillsbury “basin” OHV context: the basin is seasonally closed to OHV use (May 18 through September 8), but during that closure riders may transport OHVs out of the basin and ride trails north of it - “there are about 33 miles of trail,” and “many of the trails in this area are 4WD trails.”⁸ This is a direct, agency statement tying a discrete mileage figure (~33 miles) to the Lake Pillsbury basin vicinity. In practical terms, dam removal eliminates the anchor destination that supports this trail network’s use, staging, camping basecamps, and family recreation planning.

In proximity to Lake Pillsbury, the OHV system therefore includes:

- **≈33 miles of OHV/4WD trails** directly referenced for the Lake Pillsbury basin context;⁸ and
- **>135 miles** of system trails and roads in the broader Upper Lake Ranger District OHV area that connect regional riders and visitors to the Lake Pillsbury region as a multi-day, multi-use destination.⁷

II. Notable motorized routes and access corridors

The Lake Pillsbury area is integrally tied to the broader Mendocino National Forest network of designated motor routes, particularly the “M-routes” that provide primary access spines and connectors. The M1 route north of Lake Pillsbury and associated segments are broadly recognized as key travel corridors.⁹ These routes support:

- Street-legal 4x4 overlanding and forest touring, including family-friendly scenic access;
- Access to dispersed camping pullouts and trailheads;
- Connectivity between staging areas, campgrounds, and communities.

Cal4Wheel recognizes that route names and sub-segments are used differently across maps and user communities (M-roads, MVUM identifiers, and locally known trail names). Nonetheless, the Forest



Service's own materials confirm the operational reality: the Lake Pillsbury region is part of an extensive, designated, motorized opportunity landscape where the reservoir acts as a central "destination node."^{7/8/9}

III. "Visitation / usage numbers" for OHV opportunities: what is known, and what FERC must require

Route-by-route visitation counts are typically not published as precise annual numbers for individual OHV trails in this area; agencies instead rely on program-level estimates, NVUM frameworks, and site-level capacity/seasonality measures. Because FERC's decision here risks eliminating a primary recreation anchor, FERC should require the applicant to provide:

- Defensible OHV visitation estimates for the Lake Pillsbury basin trails (the **≈33 miles**)⁶; and
- A recreation-economic model that quantifies the loss of OHV-related visitation supported by the **>135 miles** Upper Lake OHV system when its primary destination lake is eliminated.⁷

At minimum, the record already establishes that (1) the OHV system is extensive and formally managed, and (2) Lake Pillsbury is a core attraction whose removal would foreseeably reduce motorized recreation visits, spending, and associated public benefits.¹³⁷⁸

THE ECONOMIC IMPACTS OF ELIMINATING LAKE PILLSBURY ARE SUBSTANTIAL, FORESEEABLE, AND LONG-LASTING

Lake Pillsbury supports a rural recreation economy: campground spending, fuel and supplies, cabin and resort revenue, guiding and hospitality spillover, and repeat tourism tied to boating/fishing seasons.¹⁵ The County of Lake has warned that loss of Lake Pillsbury as a recreation destination could significantly reduce tourism-based revenues and that the potential loss to county revenues exceeds \$1 million annually when considering property taxes and project-related contributions - while noting temporary deconstruction jobs do not replace long-term recreation and property value losses.¹⁰

At the same time, California's broader OHV recreation economy is large, and regional OHV destinations provide measurable economic value. State-level reporting and program materials consistently recognize OHV recreation as a significant contributor to California's economy and visitation footprint.¹¹

FERC should require a rigorous recreation-economics analysis as part of any NEPA review of a surrender proposal that removes Scott Dam, including:

- Direct spending losses from displaced lake-based recreation (boating, marina services, lakefront camping, rentals);⁵
- OHV-related losses tied to reduced destination value for the Upper Lake OHV system and Lake Pillsbury basin trails;^{7/8}
- Secondary impacts to gateway communities, small businesses, and rural service providers;¹⁰
- Real property value impacts on lake-adjacent communities and associated county fiscal impacts.¹⁰



An outcome that drains the reservoir is not “restoration without cost.” It is a permanent regional economic contraction and a shift of social and fiscal burdens to local governments and residents.

DAM REMOVAL THREATENS COMMUNITY WATER RELIABILITY AND REGIONAL BENEFICIAL USES

The Potter Valley Project (PVP) is a trans-basin diversion system with century-scale reliance interests. Independent regional water entities describe the PVP as supporting water supply for over 600,000 people in Mendocino, Sonoma, and Marin counties and warn that cessation of diversion creates serious threats to communities, farms, businesses, wildlife, and habitats tied to Russian River water reliability.¹² State water documentation shows that historically (at least at the time of certain regulatory baselines), diversion volumes could be substantial - on the order of up to 160,000 acre-feet regularly diverted at a prior point in time - underscoring how deeply interwoven the system is in water planning and compliance frameworks.¹⁶ Even where diversion amounts have changed over time, the reliance is not speculative; it is institutional and operational across agencies and districts.

The Potter Valley Irrigation District (PVID), for example, documents reliance on PVP facilities for diversion and supply of up to 19,000 acre-feet of water and serving hundreds of agricultural customers... water that depends on storage and release functions tied to Scott Dam and Cape Horn facilities.¹⁷

FERC must weigh, in a transparent and quantified manner, the impact of removing Scott Dam on:

- Municipal and domestic reliability (including drought resiliency);
- Agricultural supply and local economies;
- Minimum instream flow management and ecological tradeoffs across basins;
- Groundwater recharge relationships for local wells and communities.^{18/17}

DAM REMOVAL WILL DEGRADE WILDFIRE SUPPRESSION CAPABILITY AND PUBLIC SAFETY IN A HIGH-RISK LANDSCAPE

Lake County and adjacent regions have endured repeated, catastrophic wildfire seasons over the past decade. The Lake Pillsbury area is remote, steep, and fuel-rich... conditions that elevate the importance of nearby, reliable water sources for initial attack and extended firefighting operations. Multiple public agency documents emphasize that removing Lake Pillsbury would eliminate a critical static water source for firefighting and reduce summer flow conditions important for suppression supply.^{19/20}

Local government and public safety professionals have specifically described Lake Pillsbury's role in wildfire response, including aerial and helicopter operations and the operational consequences of losing an immediately available water source in a remote area.^{20/18} The wildfire implications are not abstract: in large incidents, minutes and proximity matter. Eliminating a major reservoir in a fire-prone landscape increases risk to:

- Residents and visitors,
- Responders,
- Critical habitat during fire events,



- Downstream infrastructure and watersheds affected by post-fire erosion and sediment pulses.

FERC should not approve a surrender plan that increases wildfire response risk without requiring enforceable alternatives or mitigation that is demonstrably equivalent in effectiveness... something that is unlikely to be achievable given the unique value of an existing reservoir.

WILDLIFE, HABITAT, AND WATERSHED IMPACTS
MUST BE EVALUATED HONESTLY ON BOTH SIDES OF THE LEDGER

Claim of ecological concerns has driven calls for dam removal, including fish passage and restoration goals in the Eel River basin. However, a lawful NEPA analysis must evaluate the full suite of environmental impacts, not only purported, yet wholly unproven, purely anticipated benefits. Draining a reservoir and undertaking large-scale demolition and revegetation introduces significant risks and uncertainties:

- Sediment mobilization, turbidity, and downstream water quality impacts during deconstruction and channel reconfiguration;
- Slope stability and geomorphic uncertainties (including documented concerns raised by water quality agencies regarding geotechnical stability considerations under reservoir drawdown scenarios);²¹
- Habitat tradeoffs: reservoir-associated aquatic and riparian habitats (and the wildlife communities that use them) would be eliminated and replaced with a different system on an uncertain timeline.^{13/21}

FERC should require a scientifically defensible comparative analysis that includes realistic recovery timelines, climate-driven hydrology variability, and cumulative effects.

FERC ACCOUNTABILITY FOR MINIMUM NECESSARY REMEDY

Cal4Wheel respectfully urges that FERC:

1. **Reject any surrender/decommissioning alternative that removes Scott Dam and eliminates Lake Pillsbury unless and until the Commission has completed a full NEPA review that transparently quantifies recreation, economic, water reliability, wildfire suppression, and ecological tradeoffs with enforceable mitigation and alternatives analysis.**^{4/12/19}
2. **Require a robust recreation impact assessment** that explicitly addresses:
 - Mendocino National Forest's documented Lake Pillsbury recreation footprint (2,280 acres; 31 miles shoreline; recreation site inventory);³
 - The **>135 miles** Upper Lake OHV system and the **≈33 miles** of OHV/4WD trails identified for the Lake Pillsbury basin context;^{7/8}
 - Displacement effects (where users realistically go, and what impacts that causes elsewhere).
3. **Require a comprehensive socio-economic impact analysis**, including county revenue impacts, gateway business losses, and property value impacts associated with eliminating the reservoir.¹⁰



4. **Require a wildfire and public safety operational analysis** that includes local agency input and quantifies the increase in response time, water availability constraints, and suppression effectiveness if Lake Pillsbury is eliminated.^{19/20}
5. **Direct the applicant to evaluate all feasible alternatives that preserve the lake**, including transfer, structural upgrades, phased safety improvements, or other options that maintain reservoir benefits while addressing safety concerns, rather than defaulting to demolition as the only “practicable” endpoint.

In closing, Cal4Wheel would like to emphasize that Lake Pillsbury is a cornerstone public asset in Northern California - supporting recreation, OHV access, family camping, local economies, water reliability, and wildfire suppression capacity.^{3/7/8/10/12/19} Eliminating it would impose irreversible losses on rural communities and the recreating public, and would magnify public safety risks in a high-fire environment. FERC should not approve an outcome that drains Lake Pillsbury and destroys Scott Dam without first ensuring the Commission’s decision is grounded in comprehensive, transparent science and economics, and that it protects the public interest as required under federal law.

Thank you for considering these comments. Please include this letter in the official record for **Project No. 77-332**.

Sincerely,

Rose Winn
Natural Resources Consultant
California Four Wheel Drive Association

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