

October 6, 2026

The Honorable Doug Burgum  
Chairman, National Energy Dominance Council  
Executive Office of the President  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, DC 20500

Dear Mr. Secretary:

This letter is for the Council's record. Pacific Gas and Electric Company and much of the coverage that follows it describe removal of the Potter Valley Project dams as what local communities want. That is not true. There is not community consensus for removing Scott Dam, Cape Horn Dam, or the diversion works. There is organized, documented opposition across the two basins.

Lake County and the Lake Pillsbury community oppose removal. Potter Valley irrigators oppose it. The Farm Bureaus of Lake, Mendocino, Sonoma, Humboldt and Marin Counties jointly opposed PG&E's decommissioning plan. More than 900 farmers, ranchers, and community leaders said the same in a 2025 letter to federal agencies. Standing-room-only town halls in Mendocino and Sonoma Counties did the same. The City of Cloverdale has intervened at FERC and the State Water Board because the Russian River is its sole water source. Lake County was barred from the Huffman coalition at CalTrout's objection. The Eel-Russian Project Authority does not speak for the landowners, most elected officials, or most tribes that lose this water. A deal among a subset of agencies, selected tribes, and environmental groups is not local support, and it should not be cited as such.

The primary reason that opposition exists is water-supply reliability. If the dam complex comes down before replacement storage is built and operating, people, farms, and fish that depend on the Eel and Russian rivers face a multi-year gap — on the order of seven years — without the reliable water this project has supplied. The proposed New Eel-Russian Facility would pump only in high-flow periods and cannot replace Lake Pillsbury storage. In Winter 2025/2026, a "good" rainfall year, that arrangement would have potentially diverted no water. Potter Valley wells depend on dry-season diversion; half or more in the irrigation district are expected to go dry in summer and fall without it. Diversions provide roughly 70 percent of the water filling Lake Mendocino, which is projected to be dry during fire season in six of ten years if the plan proceeds. Agriculture tied to this water is estimated at \$1.4 billion a year (<https://www.usda.gov/sites/default/files/documents/usda-potter-valley-comments-project-no-77-332.pdf> pp1-2). Reduced diversions since 2005 did not recover salmon and steelhead at Cape Horn Dam. Demolition plus a sediment flush would leave both rivers without managed late-season flows.

PG&E and others continue to justify demolition by calling Scott Dam seismically unstable and the Project too expensive to keep. Those claims should not be accepted at face value. Through 2022, annual California Division of Safety of Dams inspections gave Scott Dam the highest rating. The current rating is "Fair" (4 of 5) — the same as or better than 101 other California dams — with the conclusion that the dam, reservoir, and appurtenances "are judged safe for continued use." Scott Dam does not appear on the December 2025 State Auditor list of 49 high-risk dams. The seismic narrative tightened after PG&E had already decided not to relicense: a 2016 PG&E assessment put the largest credible earthquake at magnitude 6.0 and 3.0 km away; after the abandonment decision, a 2021 assessment raised that to 6.6 and 1.2 km and applied more severe test loads. In 2023 PG&E placed Scott Dam under Critical Energy Infrastructure Information, blocking public review of the very studies now used to argue the dam must come down — even though the powerhouse has been offline since 2021 and PG&E has filed to demolish it.

Expense is likewise a choice, not a physical fact. The Project delivered local hydropower from 1908 until PG&E declined to replace a faulty transformer in 2021. A gravity-fed system using a fraction of Eel River inflow is not inherently uneconomic. Three downstream plants lose generation if the PVP is removed; a plant at Scott Dam could more than triple output. Lake Pillsbury water was used to fight the Mendocino Complex and August Complex fires. Removing the two principal reservoirs in this fire country during fire season is not a cost savings. It shifts the cost onto farms, towns, fire agencies, and ratepayers who will have to replace storage that already exists.

Published cost figures make the same point. PG&E told the California Public Utilities Commission in May 2025 that demolishing the Project will cost about \$532 million — a “high-level,” all-in figure it will recover from ratepayers, who had already been charged roughly \$196 million toward Potter Valley decommissioning by 2022 and are on track to have about \$321 million collected by 2029. Independent 2021 engineer’s estimates for taking Scott and Cape Horn Dams out were \$133–\$185 million in construction alone, before permitting, sediment, restoration, replacement storage, and years of lost supply. The Two-Basin / New Eel-Russian Facility that is supposed to replace the diversion is preliminarily priced at about \$50 million to build and \$5 million to design — plus \$7–\$12 million every year in operations, insurance, a water-rights lease, and payments into an Eel River restoration fund, paid by Russian River water users and patched with state and federal grants (including \$9 million from the California Department of Fish and Wildlife and \$2 million from the Bureau of Reclamation). Those figures do not buy Lake Pillsbury storage. They buy a pump that, in a “good” 2026 rainfall year, would have diverted no water. Feasibility work on keeping the works and adding fish passage put capital in a different band: on the order of \$51–\$64 million for passage alternatives, or \$100–\$400 million in 2020 dollars for a licensed regional project — against later public estimates that demolition plus new storage and perpetual pumping will run into the low billions. Ratepayers are being asked to pay to tear down capacity that still exists, then pay again to rent a fraction of it back.

Affordability of water and power is the household version of the same ledger. Potter Valley already runs on thin margins; half or more of the district’s wells are expected to go dry in summer and fall without the dry-season diversion. Replacing gravity storage with a high-flow-only pump raises the unit cost of every acre-foot that does arrive, and it arrives only in wet months. In 2026, a “good” rainfall year, that pump would have diverted no water. Downstream, Lake Mendocino is projected to be dry during fire season in six of ten years if the plan proceeds — which means trucked water, deeper wells, fallowed ground, and higher municipal rates for communities whose sole or primary source is the Russian River. Agriculture tied to this supply is estimated at \$1.4 billion a year. California households are already carrying PG&E’s wildfire and grid costs. A half-billion-dollar teardown, followed by a seven-to-twelve-million-dollar annual pump-and-lease bill, is not rate relief. It is a transfer of cost from an existing gravity system onto farms, towns, fire agencies, and the same ratepayers who funded the dams’ depreciation.

We enthusiastically support the exploration of alternatives to dam removal that would keep the works in service including through purchase, government transfer or other operator. We ask the Council to place on the record that dam removal does not have community consensus; to treat the seismic and cost claims as contested, not settled; to compare the published demolition bill and the Two-Basin pump’s annual cost against the lower published cost of keeping storage and adding fish passage; and to oppose any schedule that creates a multi-year water gap for people, farms, and fish on the Eel and Russian rivers.

Respectfully submitted,

Dr. Rich Brazil, DVM

*On behalf of residents and organizations of Lake, Mendocino, and Sonoma Counties*