

Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Dear Secretary Bose,

As a downstream resident, I have several concerns about relicensing the Cape Horn and Scott Dams on the upper mainstem Eel River.

Scott Dam is rated “high hazard” because loss of human life is probable in the event of dam failure. Yet the public can’t access the Emergency Action Plan for dam failure or most of the information FERC has about the safety issues these dams present. For local communities to respond appropriately to an emergency, we need to know what to expect: how the notification process works, which parts of our community may be inundated by floodwaters, and where to evacuate.

The Oroville Dam crisis has shown we cannot assume even recently relicensed dams are safe. FERC should address the issues around the safety of the Eel River dams in this relicensing process. To do so, FERC must also insure the public can access at least some of the material now classified as Critical Energy Infrastructure Information, including the Emergency Action Plan.

As well, FERC should reissue the Scoping Document to project decommissioning and dam removal as an alternative for detailed study in the EIS. The project appears to be an economic liability. It clearly presents safety issues. The power it produces could be replaced with five acres of solar panels. And it certainly entails significant and lasting environmental effects on the Eel River. Thus, what the Scoping Document describes as a “viable, safe, and clean renewable source of power and consumptive water to the region” may not be economically viable, may not be safe, and may be readily replaced with lower-impact power sources.

Sincerely,