## Action Alert: Keep PG&E Accountable for Protection of threatened Butte Creek Spring Run Chinook Salmon

Background August 24, 2023

PG&E has requested authorization from both the California Public Utilities Commission (CPUC) and the Federal Energy Regulatory Commission (FERC) to transfer all of their hydroelectric generation assets to a newly formed subsidiary called Pacific Generation.

Several of the hydropower assets that PG&E seeks to transfer are in the midst of license renewal, including the DeSabla-Centerville project, FERC P-803. This seems a blatant attempt to reduce the company's liability on **neglected aging infrastructure**, and is not in the public's best interest.

California Sportfishing Protection Alliance filed lengthy <u>statements</u> outlining why the DeSabla-Centerville project specifically should be excluded from PG&E's proposed transfer, or PG&E fix the failing infrastructure or surrender the license.

There was incredible destruction released on Butte Creek August 10, when the Butte Canal, carrying 60 cfs, failed and sent a torrent of water down over 600' in elevation along a course approximately 1500' in length directly into Butte Creek. The resulting landslide blocked Butte Creek for several hours while millions of gallons of water built up behind the dam. When it broke, it unleashed a torrent of water that turned Butte Creek orange. Ten days after the event the water is still cloudy, sediment covers all the surfaces under the water, and a massive new gravel and sediment bar sits upstream in Butte Creek waiting for the next storm to wash more down. All this is directly above the prime summer holding area for the spring run Chinook salmon of Butte Creek, the last, best stronghold in the state of California.

**You can file comments** urging FERC to require PG&E to clean up the mess throughout Butte Creek and immediately take measures to ensure it never happens again. See below for instructions and talking points and sample letter, or go to <a href="http://www.buttecreek.org">http://www.buttecreek.org</a>.

## **INSTRUCTIONS:**

- Navigate to FERC Online; <a href="https://ferconline.ferc.gov/QuickComments.aspx">https://ferconline.ferc.gov/QuickComments.aspx</a> follow instructions for authorizing and submitting your eComments.
- Check your email for your eComment link.
- Draft your comments in a Word or text file, so you can copy and paste them into the text box on FERC Online. Or copy and paste our sample comments.
- Search for docket number **P-803** and select the blue + symbol
- Enter your comments in the text box, and select "Send Comment"
- Or mail directly to Kimberly Bose, Secretary, Federal Energy Regulatory Commission 888 First St NE, Washington, DC 20426

## **TALKING POINTS:**

- Your recent experiences with the Butte Canal failure and sediment pollution of the creek. Pictures please.
- Centerville Head dam needs to come out now to give threatened salmon and steelhead access to the upper basin habitat and a chance at recovery.
- That PG&E has not demonstrated that the new LLC, Pacific Generation, has the financial or technical means to handle their liabilities for decommissioning, dam removal, and restoration.
- The Centerville project no longer functions as a hydropower project, so it does not generate any income to offset operations and maintenance costs, let alone decommissioning costs.
- Allowing PG&E to transfer the DeSabla-Centerville Project license is not in the public's best interest. At a minimum, PG&E should be required to complete the licensing process which began in 2004 and fix all the identified issues. In addition, a more current review of the condition of the project and the reasonable upgrades necessary to make the project safe and financially viable should be undertaken immediately. If PG&E chooses to continue delay and deflect strategies with this project, their license should be revoked.

## Our sample letter:

Dear Secretary Bose,

In order to protect and recover threatened runs of spring run Chinook salmon and steelhead in Butte Creek, the Centerville Head dam of the DeSabla-Centerville project must be removed as soon as possible. This will restore access to a dozen miles of high-quality habitat above Centerville Dam, in addition to providing other ecological benefits. Furthermore, the recently failed Butte Canal needs a complete rebuild to ensure the safety of the canal from the horribly destructive failures such as happened August 10, 2023.

PG&E has acknowledged that Centerville Dam has no purpose as the Centerville powerhouse and canal are beyond repair. Centerville Dam needs to be removed immediately. The powerhouse, penstocks, and canals must be decommissioned or repurposed.

The public's best interest is served by requiring PG&E to set a path to accelerated dam removal, repair and modification, thus furthering protection and restoration of Butte Creek native fish. Transferring the license of the DeSabla-Centerville Project to Pacific Generation would do nothing to advance project licensing, repair or decommissioning, and could instead slow the process.

If PG&E's license transfer proposal is approved, FERC must ensure that Pacific Generation has the financial and technical means to handle PG&E's liabilities for decommissioning, dam removal, and restoration of the project area. If the Commission decides the transfer is inappropriate, it should require PG&E to complete the current licensing and immediately begin satisfying the conditions imposed by the State and Federal agencies, including Centerville dam removal, lower Centerville canal repurposing, and any other contemporary conditions, such as total repair of the recently failed Butte Canal.

Sincerely,

(your name and address)