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5/8/23

VIA E-FILING

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Brunswick, Maine Fishway Probable Violation (FERC P-2284)

Dear Secretary Bose,

On and about April 29, 2023 much of Maine encountered a large rain event with total precipitation amounts typically in the 3-6" range. Fortunately most snowmelt had already occurred so flooding was less than it could have been. About a week prior to the storm the rocks below the Brunswick dam were covered with cormorants indicating alewives had arrived and were ready to ascend the fishway, not yet open. Listed Atlantic salmon are likely also in the river attempting to move upstream and other species including American shad, sea lamprey and American eel should be here shortly as air and water temperatures are climbing rapidly.

We want to call the Secretary's attention to a massive log jam resulting from the recent high water (about 15' below historic flood levels) that has rendered the fishway inoperable until cleared. While water levels have been falling this last week and the weather has been good since probably last Wednesday the 3rd, there has been no external evidence of Brookfield actions to remove logs and activate the fishway.

As you noted to Brookfield's Kelly Maloney in a June 30, 2021 letter regarding a fishway excursion event on May 12, 2021:

"The ISPP [Interim Species Protection Plan] identifies measures necessary to avoid and minimize the effects of project operation on federally-listed Atlantic salmon. Under the ISPP, the Maine Department of Marine Resources (Maine DMR) operates the upstream fishway including the trap and sorting facility during the upstream salmon migration period from May 1 through October 31. You are responsible for all measures necessary to keep the fishway in good operating condition. If the fishway malfunctions or becomes inoperable during the critical months, you are responsible for the repair and restoration of the fishway to normal operations."

Having had good weather for a while now and with warm sunny weather forecast for this week and migratory fish in the water, we wish to ensure that Brookfield White Pine Hydro is actively engaged in removing debris from the fishway so passage can begin and be running at optimal levels as soon as possible. By this notice we seek FERC's attention to ensure fish passage is promptly operational for the Androscoggin River. The attached aerial photos were taken Saturday May 6, 2023.

Thank you for your timely attention to this matter.

Sincerely,



Ed Friedman, Chair

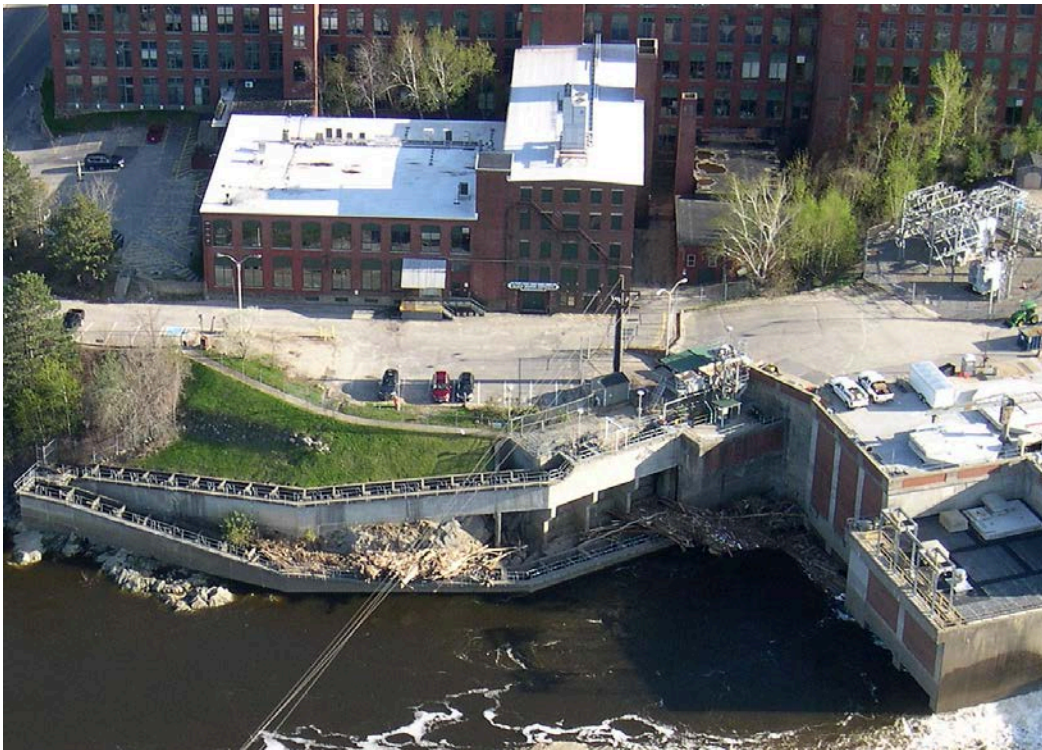
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Photos: Point of View Helicopter Services

7 days 30 days 1 year

Androscoggin River Near Auburn, Maine - 01059000

April 8, 2023 - May 8, 2023

Streamflow, ft³/s ⓘ



7 days 30 days 1 year

Androscoggin River Near Auburn, Maine - 01059000

May 8, 2022 - May 8, 2023

Streamflow, ft³/s ⓘ



Graphs: USGS

<https://waterdata.usgs.gov/monitoring-location/01059000/#parameterCode=00060&period=P7D>