Brookfield
Renewable N.A.

April 1, 2026

VIA E-FILING

Debbie-Anne Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

RE: **Brunswick Hydroelectric Project (FERC No. 2284), Response to Comments on the Initial Study Report and Meeting.**

Dear Secretary Reese:

In accordance with Title 18 Code of Federal Regulations (18 C.F.R.), Sections 5.15 (c) and 5.15 (c)(5) of the regulations of the Federal Energy Regulatory Commission (Commission or FERC), Brookfield White Pine Hydro LLC (BWPH), encloses for filing this response to comments on BWPH's Initial Study Report (ISR) and ISR meeting summary for the relicensing of the Brunswick Hydroelectric Project (Project), FERC Project No. 2284. The current license for the Project expires on February 28, 2029.

On December 31, 2025, BWPH filed its ISR with the Commission as required by 18 C.F.R. § 5.15(c)(1). In accordance with the Commission's regulations at 18 C.F.R. § 5.15(c)(2), the ISR meeting was held within 15 days of issuance of the ISR (the meeting was held virtually on January 15, 2026). As required by the Commission's regulations at 18 C.F.R. § 5.15(c)(3), on January 30, 2026, BWPH filed a summary of the ISR meeting, and did not propose any modifications to any of the studies, nor did BWPH propose any new studies. In addition, on January 27, 2026 BWPH held a meeting with relicensing participants to discuss downstream fish passage alternatives as part of the on-going Upstream and Downstream Fish Passage Alternatives Study.

The National Marine Fisheries Service (NMFS), Maine Department of Environmental Protection (MDEP), Maine Department of Marine Resources (MDMR), Maine Department of Inland Fisheries and Wildlife (MDIFW), Free the Andro Coalition (FTA), and Friends of Merrymeeting Bay (FOMB) filed written comments on the ISR and ISR meeting, as well as the January 27, 2026 downstream fish passage meeting (Attachment A). Attached please find a responsiveness matrix providing responses to all comments received from these relicensing participants.

If there are any questions or comments regarding the RSP, please contact me by phone at (315) 566-0197 or by email at Michael.Scarzello@brookfieldrenewable.com.

Sincerely,

Michael Scarzello
Manager, Licensing

cc: Distribution List

DISTRIBUTION LIST
Brunswick Hydroelectric Project (FERC No. 2284)

I, Michael Scarzello, Manager, Licensing, Brookfield Renewable, hereby certify that copies of the foregoing document have been transmitted to the following parties on April 1, 2026.

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One copy, via e-filing to:

Ms. Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Dockets Room
Washington, D.C. 20426

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Response to Initial Study Report Comments for the Brunswick Hydroelectric Project

Stakeholder	Comments	BWPH Response
Water Quality Assessment		
MDEP-1	The first sentence of 1.1 Background, states: "Maine statute 38 Maine Revised Statutes Article (MRSA) §464-470 establishes the State's classification system of surface waters". The Department recommends the following revision: "Title 38, Article 4-A of the Maine Revised Statutes (38 M.R.S. §§464-470) establishes the State's Water Classification Program."	Comment noted. The updated text will be included in the Draft License Application and study report.
MDEP-2	In Table 1.1, the Department recommends adding "Discharges" in front of "May not cause" for the Aquatic Life parameter.	Comment noted. The updated text will be included in the Draft License Application and study report.
MDEP-3	It is of note that the pH criteria listed in Table 1.1 only applies to discharges. Although it has been proposed in the Triannual Review (TR) of Water Quality Standards, it is not currently a statewide ambient criterion. Reference 38 M.R.S. §464 4(A)(5). Table 1.1 Water Quality Standards should be adjusted accordingly. As a part of the Triannual Review, changes are being proposed for the Class B dissolved oxygen criteria. If adopted, these changes should be considered in the relicensing process and incorporated as needed into future documents. All license applications are subject to the substantive laws and rules in effect on the date the application is accepted as complete for processing. 06-096 C.M.R. Ch. 2.	Comment noted. The updated text will be included in the Draft License Application and study report.
MDEP-4	Chapter 583: Nutrient Criteria for Class AA, A, B, and C Fresh Surface Waters, went into effect on June 11, 2025, and includes numeric criteria for phosphorus (TP) and chlorophyll a collected from June through September. Table 1-1 and the analysis should be adjusted as follows. The TP value listed in Table 1-1 aligns with the adopted Class B criteria for riverine impoundments, but it should be calculated as the geometric mean of all data collected in the applicable season (i.e., October values should not be included in the calculation). This information should be included in Table 1-1, and calculations should be included in the report. The Chlorophyll a criterion should also be added to the table as follows: spatial geometric mean of £ 8.0 and no value > 10.0 mg/L. The chlorophyll a criterion is the spatial geometric mean, which in the rule is defined as the geometric mean of multiple measurements of chlorophyll a that were collected at different locations in an impoundment. This calculation may include data collected at different times during a season. In the Brunswick study, chl a was measured at one location throughout the season. The Department finds that it is adequate to calculate the seasonal geometric mean for that location. As noted above, October data should not be included in the calculation.	Updated calculations not including the October data for total phosphorus and chlorophyll-a will be provided in the Draft License Application and study report.
MDEP-5	On Page 14, the web address in the citation for MDEP 1996 leads to a broken link. The correct link is: https://www.maine.gov/sos/sites/maine.gov.sos/files/content/assets/096c581.doc	Comment noted. This will be corrected in the Draft License Application and study report.
MDEP-6	The TSI equation for chlorophyll is incorrect. The correct equation to use for this calculation is: $TSIChlorophyll = 70\times \log(mean\ Chlorophyll + 0.71)$	Comment noted. The updated text will be included in the Draft License Application and study report. Please note that the equation listed in Chapter 581 of MDEP 1996 (TSI = 70 log (mean chlorophyll a + 0.7)) is then incorrect.
Tailwater Benthic Macroinvertebrate Study		
MDEP-7	The DEP Biological Monitoring Unit completed processing macroinvertebrate data from Station S-1298 below the Brunswick Falls dam, and an Aquatic Life Classification Attainment Report is now available. The macroinvertebrate community sampled at this station in 2025 attained aquatic life criteria for Class C (p = 1.00) but did not attain criteria for Class B. The community was dominated by highly tolerant genera, including two midges (Dicrotendipes and Ablabesmyia), a flatworm (Dugesiidae), two snail taxa (Physella and Amnicola), and a tolerant caddisfly (Oecetis), which together comprised approximately 73.5 percent of community abundance. Stonefly mean abundance was very low (1.33). EPT generic richness (mayflies, stoneflies and caddisflies) was 14, however many of the taxa present were either relatively tolerant or occurred in low numbers. Substrate composition recorded by Normandeau Associates in the field was appropriate for macroinvertebrate rock basket sampling according to required DEP protocols and is not a likely factor in the class attainment result. The Initial Study Report states that the sampled area is tidally influenced, however specific conductance and total dissolved solids measurements recorded in the field at basket deployment (7/28/2025, 78.4 uS/cm, 51 PPM) and retrieval (8/26/2025, 93.2 uS/cm, 61 PPM) were not in the range to indicate brackish or saline conditions during the sampling period. More information is needed regarding the range of any freshwater tidal fluctuations over the period when rock baskets were deployed to determine potential impacts on the macroinvertebrate community. The Department requests a Tailwater Benthic Macroinvertebrate Study to be repeated at a different sampling site. Please see the attached study request	The Project represents the head of tide and tidal fluctuation was calculated using hourly tailrace elevation (ft) measurements for the BMI rock basket deployment period (July 28-August 26). The data indicates daily tidal fluctuations ranging from 4.63 ft to 6.49 feet (mean of 5.69 feet) (see Table below). The original study request from MDEP was that an 'Assessment of the macroinvertebrate community is critical to determine whether current in-stream flow releases affect attainment of classification standards for aquatic life in the Androscoggin River below the Project.' Given that the Project powerhouse is located at the head of tide, it is unlikely that another sampling location can be found that is not under tidal influence. In other proceedings (Cataract Hydroelectric Project, FERC No. 2528), MDEP has stated that if a sampling location is tidally influenced, its BMI study methods are not

Stakeholder	Comments	BWPH Response

appropriate and are not required.[1] Given that the reach below the Project powerhouse is tidally influenced, BWPH has concerns that the BMI study proposed by MDEP will again not yield scientifically valid results and will not inform the relicensing proceeding. Therefore, BWPH does not believe this study needs to be repeated and would be unnecessary. BWPH intends to consult further with MDEP to discuss these concerns.

Date	Daily Tailrace Elevation		
	Minimum (ft)	Maximum (ft)	Range of tidal fluctuation (ft)
27-Jul	-0.25	5.60	5.86
28-Jul	-0.29	5.46	5.75
29-Jul	-0.18	5.17	5.35
30-Jul	-0.15	4.85	5.00
31-Jul	0.05	4.68	4.63
1-Aug	-0.29	4.68	4.96
2-Aug	-0.31	4.43	4.75
3-Aug	-0.35	5.05	5.40
4-Aug	-0.26	5.95	6.20
5-Aug	0.85	6.05	5.20
6-Aug	0.06	6.25	6.19
7-Aug	-0.49	4.70	5.19
8-Aug	-0.45	4.94	5.40
9-Aug	-0.47	5.34	5.81
10-Aug	-0.49	5.38	5.87
11-Aug	-0.40	5.36	5.76
12-Aug	-0.46	5.26	5.72
13-Aug	-0.35	5.40	5.75
14-Aug	-0.59	5.40	5.99
15-Aug	-0.36	5.86	6.23
16-Aug	0.06	5.45	5.39
17-Aug	-0.20	5.85	6.05
18-Aug	-0.21	5.41	5.63
19-Aug	-0.67	5.45	6.11
20-Aug	-0.73	5.15	5.88
21-Aug	-0.40	5.60	6.00
22-Aug	-0.31	5.81	6.12

[1] https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20241217-5056.

Stakeholder	Comments	BWPH Response

23-Aug	-0.31	6.13	6.44
24-Aug	-0.82	5.68	6.49
25-Aug	-0.46	5.44	5.90
26-Aug	-0.32	5.23	5.54
Min			4.63
Max			6.49
Range			5.69

Computational Fluid Dynamics Modeling		
MDMR-1	MDMR looks forward to reviewing additional data and results from the tasks identified for this study as they are completed.	Comment noted.
Upstream and Downstream Fish Passage Alternatives Study		
NMFS-1	Description of Modification: We request that the Commission modify the approved Upstream and Downstream Fish Passage Alternatives Study (Appendix D) to require the Licensee to conduct an empirical downstream passage survival and route selection study for adult and juvenile alosines (American shad and river herring), rather than relying on desktop models. 18 C.F.R. § 5.15(d) - Inadequacy of Approved Methodology: As demonstrated by the Phase 1 progress reported in the ISR and the draft alternatives matrix circulated during the January 2026 consultation, the goals and objectives of the Fish Passage Alternatives Study cannot adequately be met using the approved desktop methodology. Without empirical data, neither the Commission nor the resource agencies can affirmatively evaluate: (1) if the existing downstream passage system is safe, timely, and effective for affected migratory species other than juvenile Atlantic salmon, including commercially and recreationally important species such as American shad and river herring; (2) if so, where and why it is effective; and (3) if not, where and why it is ineffective. Desktop models cannot accurately determine site-specific route utilization or survival estimates for alosine species. Because the analysis lacks empirical baseline data, the matrix evaluates alternatives without knowing the actual route selection or mortality rates currently occurring at the project. Without this baseline data, the study may present alternatives that do not accurately target the true mechanisms of passage failure or success. We have consistently maintained in our June 18, 2024, November 1, 2024, December 17, 2024, and January 28, 2025, filings that this empirical baseline data is required to adequately evaluate project effects. § 5.9(b)(1) Resource Management Goals: Our resource goals for the project area are established in the 2020 Androscoggin River Watershed Comprehensive Plan for Diadromous Fishes. A fundamental objective of this Comprehensive Plan is to restore American shad and river herring populations by ensuring safe, timely, and effective upstream and downstream passage at hydroelectric barriers. Because the Brunswick Project is the head-of-tide facility, all of the river's successfully reproducing alosines and their progeny must pass this dam. § 5.9(b)(3) Existing Information and the Need for Additional Information: The Initial Study Report (ISR) lacks any site-specific baseline survival estimates for alosines. Without this baseline empirical data, the Alternatives Study uses highly conservative desktop-based assumptions regarding the mortality inflicted by the existing turbine units, as well as likely route of passage and distribution, which may result in prescribing alternatives that do not accurately target the true mechanisms of passage failure. The consequences of this include potentially costly investments by the licensee that may not provide safe, timely, and effective fish passage. § 5.9(b)(4) Project Nexus: The project's dam and generating facilities act as a barrier to migration and a documented source of mortality for downstream migrating fish. The requested empirical data will directly inform what structural or operational alternatives at the project would be necessary to mitigate this effect. Justification (Criterion 7 - Cost and Level of Effort): As stated in our original June 18, 2024, study request, the estimated cost of an empirical downstream telemetry study is approximately $500,000. This level of effort is commensurate with a project the size of the Brunswick Project and the likely term of the new license. Furthermore, this cost is negligible compared to the financial risk of engineering and constructing permanent downstream fishway alternatives based on inaccurate desktop proxy data.	The Commission previously determined that these studies were unnecessary as described in its December 30, 2024, Study Plan Determination. BWPH continues to see no benefit in conducting these costly studies to analyze the effectiveness of the existing downstream passage system that resource agencies will ultimately require to be upgraded to meet their standards for safe, effective, and timely fish passage. It is common to use data from similar hydroelectric projects with similar configurations and conditions to estimate passage survival and route of passage distribution. Desktop entrainment studies are more than adequate for the purpose of assessing existing downstream passage conditions, and much less expensive to conduct than field studies. BWPH's approach continues to focus time and financial resources on analyzing Protection, Mitigation, and Enhancement (PME) measures that can be implemented to improve downstream fish passage efficiency at the Project. BWPH's proposed approach will provide FERC with the information needed to conduct its NEPA analysis as well as inform potential PME measures related to downstream passage at the Project. In addition, it is not clear how any greater level of accuracy that may be achieved with site-specific survival estimates would inform the analysis of downstream passage alternatives. Most downstream passage technologies focus on fish exclusion from turbines and providing a fish bypass sized with an appropriate attraction flow. If site specific studies showed an 80% turbine survival for a given species versus a 90% turbine survival from desktop methods for that same species under existing conditions, it would not materially change the range or type of passage alternatives analyzed.

Stakeholder	Comments	BWPH Response
MDMR-2	Downstream Alternative D1: Angled Bar Rack with New Downstream Bypass The current conceptual sketches of the angled bar racks include an isolation wall that separates Unit 1 and Unit 2/3 because the Unit 1 intake is deeper. Please describe why this isolation wall is required at the project and whether it could have windows or gaps in it to allow for equalization of velocities between the two intakes. During the call, engineers from Kleinschmidt indicated that there may be issues with high velocity hot spots in certain areas where the racks are close to the powerhouse. If this is the case, turbine turndowns could be one potential solution to address this issue. Another option for reducing velocities could be to extend the length of the racks such that a larger rack area interacts with the flow.	The isolation wall is required to provide structural support to the angled bar racks in front of each unit, as there is an approximately 32-foot difference in the bottom elevation between Unit 1 and Units 2/3, and an approximate 15-foot difference in the bottom of the angled rack structure. The need for any measures to equalize velocities between the two intakes will be informed by the CFD modeling study. Similarly, the velocity characteristics at the intakes for this alternative will be analyzed as part of the CFD modeling study, which will inform the need for any structural or operational changes (i.e., orientation, length, unit turndowns, etc.) to the conceptual design/layout to address high velocity. The results of this analysis will be described in the Upstream and Downstream Fish Passage Alternatives Study report.
MDMR-3	Downstream Alternative D2: Inclined Bar Rack with New Downstream Bypass The current conceptual sketch includes surface and low-level bypasses on the river side of the Unit 2/3 racks. Unlike the angled rack alternative, the inclined racks do not provide lateral guidance for fish to find a bypass location in that area and MDMR has concerns that the current design would not effectively attract fish. MDMR would recommend designing multiple surface and low level bypasses along the face of the racks so that turbine flow through the units serves as additional far field attraction. During the call, the licensee posited that fish would utilize the upstream fish passage as a downstream bypass. While some fish may use the upstream fishway, in MDMR's experience route of passage studies rarely report fish using the upstream fishway for downstream passage. Thus, MDMR would not recommend the upstream fishway to take the place of a dedicated downstream bypass unless there is guidance to the upstream fishway and the upstream fishway meets attraction flow and other criteria for a downstream bypass.	Based on the analysis to date, while it might be preferable to integrate the downstream bypass into the rack face structure, the existing layout of the intake structures does not allow for this type of solution. The velocity characteristics at the intakes for this alternative will be analyzed as part of the CFD modeling study. BWPH stated that fish may use the upstream fishway as a route of passage if that fishway were to remain in a similar configuration. However, BWPH was not recommending that the upstream fishway be used in lieu of the dedicated downstream bypasses described as part of this alternative.
MDMR-4	Downstream Alternative D3: Floating Guidance Boom with New Downstream Surface Bypass Structure MDMR agrees with the licensee's assessment that this alternative would have low effectiveness. In our experience, even surface oriented migrants (i.e., Atlantic salmon, river herring) often sound below guidance booms, making them ineffective at preventing fish from becoming entrained in the turbines. Entrainment is even more likely for fish that approach at depth (i.e., American eel and American shad), hence the need for additional measures to protect American shad and nighttime shutdowns to protect American eel. However, nighttime shutdowns have their own shortcomings, namely in diel and seasonal operation timelines and the need for adequate bypass flows while the turbines are shut down. In addition, the current alternative does not include a bypass structure that MDMR would consider adequate for attracting and conveying fish safely downstream in a timely and effective manner. For these reasons, MDMR is not supportive of this alternative in its current form. While a boom would require a flume extension to reduce impacts to upstream passage, that may not be the case if a new upstream passage facility was constructed at the project in a different location.	Several eel migration studies have been conducted in the Northeast and Mid-Atlantic regions to establish the diel and seasonal movement patterns of downstream migrating American eel. BWPH does see this as a significant limitation to the effectiveness of nighttime shutdowns. This alternative provides a new surface bypass with an attraction flow of approximately 375 cfs (5% of station discharge), as well as a plunge pool meeting USFWS design criteria at the base of the dam.
MDMR-5	Downstream Alternative D4A: Multiple Fish Friendly Runner Replacement Please provide information related to the service life of all three units. MDMR is supportive of investigating this alternative. However, as the licensee indicates, this technology is still experimental and as such, the licensee must be prepared to implement additional measures in a timely manner should this technology fail at the project. At this point in the process, it does not make sense to exclude additional downstream protective measures from this alternative. Modeling of similar alternatives at other projects has shown potential for higher injury and mortality for large fish (i.e., Atlantic salmon kelts, American shad). Thus, appropriate exclusion and guidance systems may be needed to ensure safe, timely, and effective passage at this site.	Information related to the service life of the turbine units will be provided in the Upstream and Downstream Fish Passage Alternatives Study report. Comment noted. The purpose of the Upstream and Downstream Fish Passage Alternatives Study is analysis of each alternative individually, if there is an advantage to combine alternatives that would be done as part of any PM&E proposal by BWPH.
MDMR-6	Downstream Alternative D4B: Unit 1 Fish Friendly Turbine with Inclined Bar Rack at Units 2 and 3 In the current configuration, there is no downstream bypass associated with Units 2/3. When those units are operating, it is reasonable to assume that fish will be attracted to the flow through those turbines as opposed to the Unit 1 intake. Once those fish are attracted to that flow they will either be entrained in the units (some juvenile alosines) or will be guided vertically up the rack until at the surface. Without a clear downstream passage route in the vicinity of the Unit 2/3 rack, fish may experience unnecessary delay upstream of the project. Thus, this alternative should include a surface and low level bypass on the river left side of the racks to provide an additional downstream passage route for fish attracted to that location. The same comment from Alternative D4A about additional downstream protections applies to this alternative as well. Perhaps this should be considered	See response to MDMR-3. The intent of this alternative is to provide the downstream passage route through a new fish friendly runner in Unit 1 and alleviate the need for a dedicated downstream fish bypass. Unit 1 has a hydraulic capacity of 5,075 cfs, which exceeds the USFWS criteria of approximately 375 cfs (5% of station discharge), as well as the combined capacity of 2,400 cfs for Units 2/3.

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	"Downstream Alternative D4C," but constructing an angled rack over Units 2/3 could provide more effective guidance to a downstream bypass than an inclined rack. It is MDMR's understanding that certain unit prioritization measures are practiced at the project to attempt to improve upstream passage. Please evaluate this alternative and others as appropriate based on existing and proposed operational scenarios at the project.	With the larger Unit 1 adjacent to Units 2/3 it would provide similar attraction cues to any surface and low-level bypass located on the spillway side of the powerhouse. BWPH implements unit prioritization during the downstream Atlantic Salmon smolt passage season (~May) with the exact timing determined annually through resource agency consultation. This is a condition of the final Atlantic Salmon Species Protection Plan that was incorporated into the Project license in 2022. However, BWPH is not aware of any unit prioritization during the upstream fish passage season.
MDMR-7	Alternatives Not Considered MDMR supports comments made by NOAA and other meeting participants during the January 27th meeting regarding the need to fully evaluate a comprehensive range of alternatives during this phase of the study. The Brunswick Dam is the first dam on the Androscoggin River and is located at the head of tide. Its position in the watershed means it affects all upstream migrating fish approaching the project, as well as those that successfully pass upstream and must later migrate downstream to the ocean. Given the ecological importance of head of tide locations and lessons learned from other Maine systems, including the Kennebec River, Penobscot River, St. Croix River, and Presumpscot River, MDMR recommends that the alternatives analysis rigorously evaluate the full spectrum of potential structural and operational approaches capable of providing safe, timely, and effective upstream and downstream passage at this critical river location. A comprehensive analysis will ensure that decision makers understand the biological performance, engineering feasibility, cost considerations, and long-term maintenance implications of each option. Public comments during the January 15th and January 27th meetings referenced the potential construction of a nature-like channel on river left near the existing tainter gates. MDMR supports evaluation of a nature like fishway alternative as part of the broader alternatives analysis for upstream and downstream passage. However, MDMR notes that while a nature like channel may improve upstream passage conditions, it may not alone provide adequate downstream passage, as a substantial portion of river flow, and therefore migrating fish, would continue to pass through the powerhouse. Accordingly, the study should also assess the need for complementary downstream passage measures, such as intake racks, operational curtailments, surface guidance structures, and fish friendly turbine technologies, to ensure a holistic and effective passage solution.	Comment noted. Discussion of the nature-like fishway alternative was the subject of a separate meeting held on March 5, 2026. Participants were asked to provide any written comments on that discussion by April 6, 2026. BWPH will provide responses at that time.
MDMR-8	No Action (Maintain Existing Conditions) MDMR was pleased to see this alternative excluded from further analysis as it is clear from the information available at this time that existing facilities do not meet USFWS guidelines and do not provide safe, timely, and effective passage for downstream migrants.	Comment noted.
MDMR-9	Additional Comments Please include a flow duration analysis to investigate how often flows exceed the capacity of all three units during the downstream passage season. Given the height and configuration of the dam's spillway, spillway passage may not provide a safe route for downstream migrants. Each alternative should include an approach to 1) study where spill occurs at the project and the impacts of spill passage on injury and mortality of migrating fish or 2) provide a proposal to concentrate spill under most conditions in an area that provides an appropriate receiving water for downstream migrants. This additional flow could be concentrated near the entrance of an upstream fishway to bolster far-field attraction.	BWPH will include a flow duration analysis in the Upstream and Downstream Fish Passage Alternatives Study report. Comment noted. Where appliable, several alternatives provide for a new surface and/or low-level bypass flow with an attraction flow of approximately 375 cfs (5% of station discharge), as well as a plunge pool meeting USFWS design criteria at the base of the dam.
FOMB-1	Our comments are brief at this time and are primarily that the full range of upstream and downstream fish [and eel] passage possibilities need to be on the table including: A. Dam decommissioning and removal with site restoration B. Nature-like passage on the north side of river heading up in vicinity of the tainter gates. If there is a lack of real estate on shore, an instream construction may need to be investigated. C. ½" clear spacing on any fish exclusion grates Unless the cost/benefit of these possibilities are investigated and made known, any analysis will be woefully incomplete.	BWPH will not be analyzing a dam decommissioning alternative as part of the Upstream and Downstream Fish Passage Alternatives Study report. In its December 30, 2024 Study Plan Determination as well as the July 29, 2024 Scoping Document 2, FERC determined that neither a decommissioning study nor the analysis of project decommissioning as a reasonable alternative in the NEPA document was warranted as part of the relicensing proceeding. In the Study Plan Determination FERC stated that "*BWPH does not propose decommissioning, nor does the project record demonstrate that there are serious resource concerns that cannot be mitigated if the project is relicensed with appropriate resource protection measures. Information from other*

Stakeholder	Comments	BWPH Response
		studies (Computational Fluid Dynamics Modeling; Upstream and Downstream Fish Passage Alternatives Study; Visual Surveys of Upstream American Eel Movements; Diadromous Fish Behavior, Movement, and Project Interaction Study; and the Evaluation of Stranding Risk/Bathymetry Study) should provide the information needed to identify potential passage improvements. Therefore, because decommissioning has been eliminated as a reasonable alternative to relicensing, there is no justification for recommending a study of decommissioning the Brunswick Dam." Discussion of the nature-like fishway alternative was the subject of a separate meeting held on March 5, 2026. Participants were asked to provide any written comments on that discussion by April 6, 2026. BWPH will provide responses at that time. BWPH will be applying USFWS fish passage engineering guidelines to the selection of trashrack spacing. Currently, those guidelines recommend ¾-inch spacing for American eel and 1-inch spacing for salmon smolts.
FTA-1	Please note that there is a factual error in that the follow-on meeting held on January 27 included only a discussion of matrices for downstream fish passage. It was agreed that an additional meeting to discuss upstream passage would be scheduled. As of this writing that meeting has not occurred. It is now scheduled for March 5, 2026. Therefore, stakeholders have not had the opportunity to review or discuss any upstream fish passage alternatives being considered or not being considered.	A meeting to discuss upstream passage alternatives was held on March 6, 2026. Participants were asked to provide any written comments on that discussion by April 6, 2026. BWPH will provide responses at that time.
FTA-2	The FTA wants the record to reflect that both dam removal and analyses of nature like fishway designs should be considered for technical feasibility. Otherwise, the matrices for both Upstream and Downstream design analyses will be missing important components. Further, at one point during the January 27th meeting a downstream fishway design consultant mentioned that Brookfield did not want a certain design considered. It was then noted by a representative of the Maine Department of Marine Resources, that a licensee cannot make unilateral decisions to preclude analyses based on internal assumptions about feasibility.	See response to FOMB-1.
FTA-3	FTA concurs that the fishways alternatives analysis must consider more options to determine technical feasibility. This is not unreasonable or outside the scope of the current suggested study plan because all parties understand that these will ultimately lead into later discussions about costs and benefits as also included in the Revised Study Plan (RSP) as filed December 2, 2024. Having these alternatives considered will take into consideration a full range of designs, including dam removal and nature-like fish passage that can be compared when cost and benefits are analyzed. This separation of alternative fishway technical feasibility and cost analyses is something FTA commented on and supported with its February 19, 2024, filing. In good faith this needs to be followed as described in the RSP.	See response to FOMB-1.
FTA-4	Regarding other designs included in the downstream fishway analysis, the FTA agrees with comments from NOAA Fisheries and others that effective downstream fish passage using Natel's Fish Safe designs for improved turbine runners would be a very powerful solution for effective, low mortality downstream fish passage if they meet theoretical design criteria for passage. However, it is noted in the matrix provided that these designs are experimental and would require further feasibility analyses by Natel. FTA notes that other "experimental and untested" alternatives were considered and rejected on those grounds. Therefore, if the Natel alternatives are pursued, FTA would like to see strongly stated support from participating federal and state agencies based on their respective assessment about the likelihood that this type of downstream passage will be effective. Given the unique nature of every dam location, we believe any option pursued would be an experiment. So, while we are certainly open to innovation, it should have attached license contingencies that require goal setting for fish passage, monitoring of efficacy, and further adaptation if passage goals are not met.	FTA suggests that some alternatives in the downstream fish passage matrix were considered and rejected solely on their experimental nature. This is inaccurate. The experimental technologies that were rejected were previously implemented at other sites and have empirical data showing limited success in achieving fish passage objectives, hence the reason for their elimination for further consideration. To date the Natel FishSafe runners have not been implemented extensively, and limited empirical data exists on their effectiveness. However, their potential application at this Project appears to be worth additional consideration.
FTA-5	A FERC license is a privilege and not a right. In this case, it allows users of a public resource, like the Androscoggin, to produce profits for private industry. The dam is owned by a subsidiary of Brookfield Renewable Partners which is a publicly traded Canadian-based, multinational company that generates electricity for sale on the open market. It has been broadly reported that Brookfield and its subsidiaries own more than 80 percent of the hydro-electric production capacity in Maine. This heavily weighted presence by one owner needs to be considered because of the potential for its operations to impact not only Brunswick but nearly every other major river in Maine. Recognizing and enforcing the fact that the right to operate hydroelectric facilities by privately held entities is a privilege and that the river systems they	Brookfield hydroelectric assets in Maine are regulated by FERC. Under the authority of the Federal Power Act (FPA), FERC may issue licenses for terms ranging from 30 to 50 years for the construction, operation, and maintenance of non-federal hydroelectric projects. This applies to all Brookfield owned hydroelectric assets in Maine.

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	use are a public and not a private resource is imperative. Proper management of diadromous fish passage at the first dam on this river inland from the ocean and a demonstrated impasse to federally protected species like the Atlantic Salmon and keystone ecological species like Alewives is also an imperative. Again, it is the intent of the Free the Andro coalition work with the licensee, FERC, authorized regulatory agencies, and other stakeholders in consultation to arrive at a well-researched and stakeholder supported solution that removes diadromous fish passage problems at the Brunswick Dam site.	The National Environmental Policy Act (NEPA) of 1969, the Commission's regulations, and other applicable laws require that FERC independently evaluate the environmental effects of relicensing the project and consider reasonable alternatives to mitigate identified environment impacts. FERC conducted a site visit of the Project and held scoping meetings on May 7, 2024, to hear the views of all interested resource agencies and other stakeholders on the scope of issues that should be addressed in the NEPA document. Additionally, there are also numerous other opportunities in the relicensing process for relicensing stakeholders to provide input to FERC. FERC will prepare either an environmental assessment or an environmental impact statement that describes and evaluates the probable effects, including an assessment of the site-specific and cumulative effects, if any, of the alternatives. The NEPA analysis will be supported by the twelve (12) environmental studies that BWPH is conducting as part of the relicensing process, as well as other relevant readily available information. The NEPA document will be prepared after BWPH submits its Final License Application in February 2027. Through this process FERC will determine under what terms and conditions to issue a new license for the Project to balance both energy generation and environmental interests.
Visual Surveys of Upstream American Eel Movements Study		
MDMR-10	Deployment and removal of eel ramps/traps required a headpond drawdown. Please describe the changes in operations required to install and remove ramps/traps and how that may have impacted the numbers and locations in which eels were found.	During both deployment and removal of the temporary ramp traps, the headpond was drawn down below the spillway crest enough to allow 30 minutes of escape time in the event of a station trip and subsequent spillage over the dam. This amounted to a drawdown between 6 inches and 1 foot depending on inflow. Operations were returned to normal within one to two hours and well before nightfall or the initiation of nighttime visual surveys. This allowed flow conditions to equilibrate, and any impacts to the eel study were de minimis.
MDMR-11	MDMR appreciates the opportunity to participate in the May 30, 2025 site visit in connection with the stranding study demonstration. However, we would like to clarify that MDMR staff were not notified in advance that placement of temporary eel ramps would be discussed during that visit. During a brief conversation onsite with Normandeau staff, three potential locations adjacent to the Tainter gates were identified. Additional areas were also discussed, including locations on both sides of the barrier wall between the dam and Shad Island. Given the limited and informal nature of that discussion, MDMR does not consider it to have constituted adequate consultation on temporary eel ramp placement. A dedicated meeting, or at minimum prior notice that ramp placement would be discussed, would have allowed for more thorough evaluation and input.	Comment noted.
MDMR-12	Please describe whether overtopping flows were concentrated in particular locations. Also please describe any other sources of flow and variations in those flows in the bypass reach other than minimal flow over the spillway and eelway attraction.	Slight amounts of overtopping flow tended to favor the river left portion of the spillway (closest to the area where ramp traps were deployed). This flow was largely small, wind-produced waves that simply provided some areas of wetted surface when a wave lapped the top of the crest.
MDMR-13	If the licensee had consulted with MDMR, we would have suggested an alternative location for this temporary ramp.	Comment noted
MDMR-14	Given the very high numbers of eels observed at the project (58,272) across 12 survey dates, lack of upstream passage facilities for eels at the project, and availability of temporary eel passage structures, MDMR would request that Brookfield White Pine Hydro voluntarily operate	Comment noted. Aside from any other study related activities required by the relicensing process, BWPH will not be operating the temporary eel ramps. Operations and maintenance of the temporary ramps would cause significant

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	and maintain a temporary eel trap at the project until subsequent license issuance and implementation of permanent upstream eel passage at the site.	disruptions to the Project's normal operations (i.e., daily impoundment drawdowns would be required for checking and maintaining the ramps).
Diadromous Fish Behavior, Movement, and Project Interaction Study		
MDMR-15	During the January 28 call, MDMR requested that all fish be tagged with SS300 tags (i.e., pressure tags) to maximize the amount of 3D data collected during the study. The licensee initially agreed to this request, however on February 10, they provided information from the tag manufacturer that indicated many tags detected simultaneously could interfere with accurate data analysis, particularly with the pressure data. The licensee's updated proposal is to tag 20% of each species with SS300 tags and the rest with SS400 tags. MDMR notes that this approach is consistent with the original study plan. Based on the new information from the manufacturer, MDMR supports this approach.	Comment noted.
MDMR-16	MDMR appreciates the inclusion of these receivers in the study plan. Based on what we heard from the consultant team, it is MDMR's impression that a minimum of 2 receivers will be needed to adequately cover this area.	Comment noted. As discussed during the January 28, 2026 call, the BWPH field crew will assess feasibility and number of hydrophones needed to adequately provide 1D coverage in the zone of interest.
Evaluation of Stranding Risk/Bathymetry Study		
MDMR-17	Please edit this sentence to specify adult river herring as the survey was likely too early to see any juvenile river herring.	Comment noted. The updated text will be included in the Draft License Application and study report.
MDMR-18	As noted during the call, MDMR staff observed one lamprey ammocoete in Area 2. Please include that observation in this report.	Comment noted. The updated text will be included in the Draft License Application and study report.
MDMR-19	MDMR agrees that it is unlikely for upstream migrating adult alosines to be able to pass the ledges in their current modified configuration. However, it is MDMR's opinion that Atlantic salmon could potentially leap over the falls, particularly at higher flow conditions than were observed (i.e., no inflow to river left channel) while the field crew was downstream of the dam during the stranding study.	Comment noted.
Fish Assemblage Study		
MDIFW-1	MDIFW reviewed the results of the Fish Assemblage Study and has concerns that the survey, as executed, failed to effectively characterize the fish community and bass spawning activity. For both components of the study (fish assemblage and bass nest surveys), consultation with MDIFW and other interested agencies was requested in initial study requests but did not occur. Consultation was requested to minimize redundancy with other analyses and to ensure that appropriate gear types were utilized and necessary level of sampling effort was met.	MDIFW filed a study request for a fish assemblage study in their letter dated June 19, 2024. The study request did not specifically request additional consultation with MDIFW on methods and location of sampling within the impoundment. The study request did suggest boat electrofishing and seine netting which were the methods used. The PSP was filed on August 2, 2024. The final SPD was issued by FERC on December 30, 2024, in which they approved this study without modification, which remained unchanged since the PSP. MDIFW was invited but did not attend the PSP meeting on September 25, 2024. MDIFW did not file any formal comments or objections on the PSP or RSP with FERC or directly with BWPH during any of the time prior to the SPD. MDIFW did have oversight authority and granted BWPH a scientific collection permit (signed May 12, 2025) to conduct the study with the methods proposed in the FERC approved plan. As a result, BWPH performed the study in accordance with the FERC approved study plan.
MDIFW-2	For the fish assemblage component to this study, MDIFW notes that electrofishing effort encompassed a relatively low proportion of the Project impoundment shoreline. Approximately 3,400 feet of shoreline were electrofished on an impoundment that extends 4.5 miles (23,760 feet) upstream and has a surface area of approximately 348 acres. Typical MDIFW Region A Fisheries boat electrofishing surveys aim to sample 10,000 linear feet of shoreline or the entirety of littoral habitat on smaller waters, whichever is less. MDIFW also notes that electrofishing effort was low compared to other recent fish assemblage surveys on nearby hydroelectric impoundments of the Lower Androscoggin River. For example, an electrofishing survey of the impoundment at the Lewiston Falls Hydroelectric Project (FERC No. 2302) sampled over 6,500 feet of shoreline on a significantly smaller impoundment (extending 2.5 miles upstream and approximately 200 acres in	The RSP stated that "The shoreline along two 1-km transects will be electrofished during the daytime in the Project impoundment. BWPH discovered that the distance covered by the efishing survey was erroneously reported as a distance in feet while the data was stored in the data software as a distance in meters, as well as reported the track distance of the electrofisher rather than shoreline distance covered.

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	surface area). This survey was developed in consultation with MDIFW and resulted in the collection of multiple fish species not detected here but of management interest to MDIFW (e.g., Black Crappie Pomoxis nigromaculatus, Rock Bass Ambloplites rupestris, White Perch Morone americana, Largemouth Bass Micropterus nigricans). It is probable that additional sampling effort in the Brunswick Hydroelectric Project impoundment may have resulted in the capture of other fish species common to the Lower Androscoggin River.	The corrected distances are: • EF01 (River Right) – One 2,431-foot-long (741 m) section of shoreline was sampled.* • EF02 (River Left) – One 3,510-foot-long (1070 m) section of shoreline was sampled. Total: 5,941 ft *Survey EF01 was cut shorter than the proposed 1000 m length as the crew ran out of time to effectively day-time electrofish after pausing to measure and offload captured fish. This will be identified as variance from RSP, but it is unlikely that the additional 189 meters would have resulted in a significant difference in fish community or species observed. Of the species mentioned in the comment (black crappie, white perch, and largemouth bass) are more commonly associated with deeper, slower and weedier habitats, which are not representative of the transects that were surveyed and not very common within this impoundment. This survey is a snapshot of the abundant species within the impoundment, and not meant to be an exhaustive search for species that are well documented as established elsewhere in the watershed.
MDIFW-3	Additionally, MDIFW suggested supplemental methodology that was not employed (i.e., gillnetting) and that was likely to improve capture rate for additional species, where present. Some fish species, including members of the family Esocidae such as Northern Pike (Esox lucius) and Chain Pickerel (Esox niger), are known to occur in the Project impoundment yet are not highly vulnerable to boat electrofishing or seine netting. Neither species was documented in study sampling efforts.	Although gillnetting was suggested by MDIFW in the initial study request, this method was rejected due to the potential for adverse interactions with endangered Atlantic Salmon. This was noted as a footnote in both the PSP and RSP for this study plan. This study was designed to occur in June, which is the typical peak of salmon migration activity. BWPH believed that the potential for an adverse interaction with a gear that commonly harms the fish was not worth the added value in addition to the other two sampling methods. One northern pike was observed while electrofishing but was not vulnerable to capture.
MDIFW-4	For the bass nest survey component of this study, MDIFW similarly has concerns that effort was not sufficient to determine potential impacts of the Project on bass spawning success. It is unclear from the study report exactly how much of the Project impoundment was visually surveyed for bass nests. In Section 2.2 (Bass Spawning Beds) the ISR states that spotters searched for bass nests "during travel between fish survey sites" and across "approximately 1,490 yards of shoreline on both sides of the river… upstream of SN02." None of these search areas are included in Figure 2.1-1 depicting survey sampling effort. Additionally, MDIFW notes that an ideal survey would have included a visual scan of all boatable water in the littoral zone of the Project impoundment, along with records of water depths for nests at all observed locations. Again, this methodology has been utilized in similar surveys across nearby hydroelectric impoundments on the Lower Androscoggin River. Finally, MDIFW notes that past studies have shown negative impacts to young-of-year bass survival in impoundments with unstable water levels, including when water level change was as little as 0.2 meters or about 0.7 feet (Clark et al. 1998). Thus, using only water depth to determine nest success or failure likely underestimates impacts to bass reproduction. In conclusion, MDIFW requests that the Licensee conduct additional study during the second year of studies to better determine impoundment fish assemblage and any potential impacts to bass spawning. As previously requested, study methodology should be developed in consultation with MDIFW and any other interested agencies.	BWPH does not believe that a second year of study is necessary, as the study was conducted in accordance with the RSP, aside from only minor deviations. The RSP only explicitly calls for surveying bass nests that were encountered in the area covered by the electrofishing survey efforts (approximately 5,941 ft of shoreline). BWPH additionally surveyed all areas where seine netting occurred (approximately 500 – 1,000 ft of shoreline). The passage described in MDIFW's comment describes a dedicated effort to scan additional shoreline to search for bass nests. To clarify the location encompasses both shores of the river from approximately 7,500 ft downstream of Pejepscot Dam upriver to a point approximately 3,000 ft downstream of Pejepscot Dam. The upstream terminus encompasses all the wadable area at a large gravel bar that

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		spans the river just downstream of the confluence with Simpson Brook at two powerline crossings. This reach encompassed approximately 8,940 ft of shoreline. This brings the total surveyed distance to at least 15,400 ft of shoreline, more than one-fourth of the Project's 11.5 miles of shoreline. Additional shoreline was informally surveyed while searching for seining sites and no bass nests were noted. The two bass nests that were documented were a minimum of 0.9 ft and 2.0 ft respectively below the minimum observed headpond elevation during this spawning season. The actual water surface elevation at the nests was 0.55 and 0.75 feet respectively above the headpond level recorded at the powerhouse at the time of the survey (based on submergence depth measured at the nest), lending evidence that the natural hydraulic controls limit the minimum headpond elevation in the upper portion of the impoundment, protecting from temporary drawdowns. Additional nests that were actively occupied and defended by sunfishes were observed but not formally documented. All were below the current water surface at the then current headpond elevation of 39.25 ft. The impoundment elevation at the powerhouse was documented to change by 4.2 ft during the black bass spawning season with the higher elevations due to flows well outside of the hydraulic control of the Project. Fish in this impoundment are persisting despite these water level fluctuations beyond the Project's control.
Mussel Survey		
FOMB-2	Lastly as MDIFW has mentioned it appears the mussel survey was only done in the shallows with mask and snorkel. Having done quite a few mussel survey (and harvests for biomonitoring) ourselves, we agree that species such as the tidewater mucket may be unaccounted for but present. However unlike IFW, we would like to see the addition of several bivalve survey transects in deeper water using SCUBA.	As specified in the FERC-approved study plan, cells were placed to prioritize shallow habitats; as shallow habitats are more likely to be affected by Project operations (e.g., Project nexus). The shallow areas surveyed contained habitat that supports a variety of mussel species of varied size classes, and the survey effort was confirmed to have been sufficiently comprehensive to document presence of the available species within the study area. Tidewater mucket, if present, would have been expected to reside in these near-shore habitats, consistent with observations elsewhere. This species will colonize areas of fine sediment in near-shore, shallow areas and there are also host fish in the study area that are known to occupy shallow, vegetated habitats (e.g., banded killifish, spawning alewife). These habitats were prevalent in the near-shore areas of the impoundment that were surveyed. As such, it is unlikely that surveys of deeper-water areas would have been more likely to document the presence of tidewater mucket than the areas surveyed.
MDIFW-5	MDIFW reviewed the results of the Mussel Survey and generally concurs with the findings; however, MDIFW notes that an ideal survey would have included sampling out to greater depths in the impoundment, instead of limiting the survey effort to shallow waters. Most of the surveys were in the 1–2-foot depth range, which is the area most impacted by regular water level management in this impoundment, likely	As specified in the FERC-approved study plan, cells were placed to prioritize shallow habitats; as shallow habitats are more likely to be affected by Project operations (e.g., Project nexus). While much of the survey area was in shallow

Stakeholder	Comments	BWPH Response
	making this area not function as suitable habitat. Previous survey efforts conducted by MDIFW's contractor Ethan Nedeau in 2023 found a similar species assemblage to what was detected in the Licensee's study, including one species not detected by the Licensee's study—Creeper (*Strophitus undulatus*). It is possible that the species is occupying deeper habitat, outside the normal daily operating range of Project.	water, often <2 ft depth (up to 6-7ft), these areas supported a robust mussel population with mature adults and juvenile eastern elliptio. Based on the size of the adults, some individuals were 10+ years old (Strayer et al. 1981), and average density across sites was 15 individuals/m^2 which shows a dense population present in these shallow habitats. At many sites dense communities were found in 20 cm of water. The site with the greatest density was 30cm deep and had 131 individuals/m^2. This indicates that these shallow areas have been functioning consistently as suitable habitat under existing operational water levels. Creeper are frequently found in quality habitat that is shallow (<6 ft) and has finer sediments. Given that these habitats were prevalent in the surveyed areas, and that the surveyed areas were found to be supporting various species and life stages of mussels, it is unlikely that additional surveys in deeper areas would have yielded creeper.
MDIFW-6	Similar to the Licensee's study results, Nedeau did not find Tidewater mucket (*Atlanticoncha ochrac*ea, State Threatened). MDIFW notes that while neither survey detected Tidewater mucket, there is a large amount of suitable habitat in the Project impoundment and it may be possible that this Threatened species occupies the Project area at low densities and/or a highly patchy distribution, which would make it challenging to detect with short-duration surveys. eDNA sampling may be a promising method for future studies to determine whether Tidewater mucket definitively occupy this reach of the Androscoggin River. MDIFW also notes that a large Tidewater mucket population is present downstream of Brunswick Dam, and this mussel species could colonize the suitable habitat upstream of the dam, provided that adequate fish passage is achieved for its fish host species. Regardless, MDIFW is not requesting additional survey effort for the Project impoundment at this time.	Comment noted.
Recreation Study		
MDIFW-7	In Section 5.3 (Impoundment Boat Access Evaluation), the ISR states, "Although there is no public trailered boat access to the Project impoundment, extensive access is available to the Androscoggin River upstream and downstream of the Project impoundment as well as to other bodies of water in the Project vicinity, including Merrymeeting Bay, Kennebec River, Cathance River, Harraseeket River, New Meadows River, and Casco Bay." The ISR also notes that the Licensee previously evaluated use of two existing trailered boat launches (Pejepscot Boat Ramp and Durham Boat ramp) and found both launches were utilized below site capacity. MDIFW acknowledges that these facilities exist and provide access to a variety of waters in the vicinity of Brunswick and Topsham; however, their existence and rates of utilization do not address the lack of publicly available trailered access to the Project impoundment. Public access to surface waters is an important State and Department goal that gives residents and visitors an opportunity to participate in various traditional outdoor activities including fishing, hunting, and multiple forms of recreational boating. Maintaining and expanding public access opportunities is particularly important in southern Maine, as traditional access opportunities to these important resources are being lost at an alarming rate due to development, land posting, and other changes in land use. The large size of the impoundment (approximately 348 acres) warrants trailered boat access with adequate parking. MDIFW requests the Licensee construct a trailered boat access with parking for 10-12 rigs and parking for 5-6 non-trailered vehicles.	MDIFW's request that Brookfield provide trailered boat access to the Project impoundment is noted; however, the results of the study indicate that ample boating access is available in the Project area (including 20 trailered boat launches within 10 miles of the Project) and existing launches upstream of the Project were found in recent years to be underutilized. Given this, and that the upstream launches provide a boating and angling experience comparable to that of the Project impoundment, Brookfield maintains that additional trailered boat access in the vicinity is not currently warranted. It is also worth noting that the Project impoundment is one of the few locations in the area open to hand-carry boats only and may therefore have value for users looking for a more primitive, natural experience.
MDIFW-8	Additionally, in Section 5.3.2.1 (Outreach, Structured Interviews), the ISR states, "When asked if the Project impoundment provides a satisfactory boating experience for trailered boats, most (recreational users) answered in the negative and cited the lack of a public boat launch serving trailered boats as the reason."2 A subset of the solicited user groups also cited smallmouth bass and northern pike fisheries as an appealing reason for providing trailered boat access to the Project impoundment. One of the interviewed groups, the Town of Brunswick, noted that it regularly receives complaints regarding the lack of trailered boat access to the Project impoundment. MDIFW concurs with the sentiments of the Structured Interviews that there are legitimate recreational reasons to provide trailered boat access to the Project impoundment. Further, results provided in the Fish Assemblage Study confirm that a Smallmouth Bass fishery is present in the Project impoundment, validating the recreational user group's desire for enhanced access to the Project impoundment.	Note that the quoted statement from the ISR erroneously references the majority of recreational users. The statement in the ISR, taken in context, states that the majority of structured interview respondents indicated that the Project impoundment did not provide a satisfactory boating experience for trailered boats. As noted in the ISR, only four organizations responded to the structured interview request (towns of Brunswick and Topsham, FOMB, and two responses from Trout Unlimited). While it is accurate that this group generally advocated for trailered boat access to the impoundment, it is worth noting that two of the five respondents indicated that the Project impoundment did not necessarily offer unique features making it more appealing for trailered boat use than upstream or downstream sections of the Androscoggin.

Stakeholder	Comments	BWPH Response
		Furthermore, of the 328 visitor survey respondents, only 3 mentioned a need or desire for trailered boat access to the Project impoundment.
MDIFW-9	Finally, MDIFW also notes the existence of a designated portage route around the Project dam for hand-carry watercraft (Figure 3.1-1). This route is long (0.9 miles) and requires crossing busy and dangerous roads, including Maine Street and US Highway Route 1. Additionally, the portage take-out site upstream of the Project boat barrier (Mill Street Canoe Portage) is only accessible to the public when the Project boat barrier is in place, limiting public access for over half the year (per Section 5.1.2.3 of the ISR, the boat barrier is typically removed from October 31 - June 15). MDIFW acknowledges that the portage trail encompasses Non-Project Facilities; however, the Licensee should evaluate locations within the Project boundary that may be able to improve access for hand-carry watercraft.	Note that the portage follows existing municipal sidewalks and crosswalks. The portage take-out is accessible year-round for boaters needing to portage around the Project dam; however, the site is closed at the entrance from Mill Street when the boat barrier is not in place in order to deter boaters from utilizing the site as a boat launch. Brookfield has evaluated locations within the Project boundary for the potential to shorten the portage route. Unfortunately, there is no location within the Project boundary downstream from the Mill Street Portage that would provide safe access for boaters. The only publicly accessible locations downstream of the existing portage take-out are the Androscoggin Swinging Bridge abutment areas. The abutment area on the Brunswick side of the river is exceedingly steep and descends into an area of swift current just upstream from the Project dam. The site is therefore unsuitable for boating access. The abutment area on the Topsham side of the river descends more gradually to calmer water; however, the site is downstream of the boat barrier, would increase rather than decrease the length of the portage route, and would similarly follow existing sidewalks and crosswalks to the put-in location. The site would therefore not constitute a significant improvement over the existing portage route.
MDIFW-10	In conclusion, MDIFW requests that the Licensee conduct an additional study during the second year of studies to evaluate potential sites in the Project impoundment that could remedy the lack of trailered boat access and improve portage conditions for hand-carry watercraft.	As noted above, the Recreation Study did not identify a need for trailered boat access or for improved portage conditions beyond minor maintenance and improved signage. As such, Brookfield does not propose additional study to evaluate potential PME measures. Any proposed PME measures will be included in the license application.