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**Comments on Initial Study Report (ISR), Brunswick, Hydroelectric Project,
Androscoggin River, Maine P-2284**

3/2/26

VIA E-FILING

Debbie-Ann A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Secretary Reese,

Brookfield has held a couple of remote meetings in January to review the Initial Study Report (ISR) for Brunswick/Topsham. The first was a general review. This was followed by a meeting to delve into downstream fish passage alternatives they were considering. Upstream alternatives are to be discussed a couple of days after the deadline for these comments. Brookfield just sent out a matrix of upstream passage possibilities today in preparation for Thursday's meeting.

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.

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.

Thank you for your consideration.

Sincerely,

Ed Friedman, Chair