



STATE OF MAINE
DEPARTMENT OF
INLAND FISHERIES & WILDLIFE
353 WATER STREET
41 STATE HOUSE STATION
AUGUSTA ME 04333-0041



March 2, 2026

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

RE: Maine Department of Inland Fisheries and Wildlife Comments on the Initial Study Report and Initial Study Report Meeting Summary, Brunswick Hydroelectric Project (FERC No. P-2284)

Dear Secretary Reese:

We have reviewed Brookfield White Pine Hydro LLC's (Licensee) December 31, 2025, Initial Study Report (ISR) and the January 30, 2026, Initial Study Report Meeting Summary for the Brunswick Hydroelectric Project (P-2284) on the Androscoggin River in Maine. We also participated in the ISR meeting held by the Licensee on January 15, 2026. Enclosed are the Maine Department of Inland Fisheries and Wildlife (MDIFW) comments on the ISR.

Best regards,

John Perry
Environmental Review Program Supervisor

Cc: Andy Wood, MDIFW Environmental Review Coordinator
Liz Latti, MDIFW Fisheries Division, Augusta Headquarters
James Pellerin, Nicholas Kalejs, MDIFW Region A Fisheries
Casey Clark, Lars Hammer, MDMR
Laura Paye, Claire Briggs, MDEP
Patrick Dockens, USFWS
William McDavitt, Matt Buhyoff, NMFS

MDIFW Comments on the Fish Assemblage Study

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.

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 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.

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.

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.

Clark, M.E., Rose, K.A., Chandler, J.A., Richter, T.J., Orth, D.J., and Van Winkle, W. 1998. Simulating smallmouth bass reproductive success in reservoirs subject to water level fluctuations. *Environmental Biology of Fishes* 51: 161-174.

MDIFW Comments on the Mussel Survey

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 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.

Similar to the Licensee’s study results, Nedeau did not find Tidewater mucket (*Atlanticoncha ochracea*, 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.

MDIFW Comments on the Recreation Study

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.*”¹ 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.

¹ Appendix J. Recreation Study. Initial Study Report. P.48.

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.

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.³

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.

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.

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.

² *Ibid.* P. 51

³ *Ibid* P. 51.