



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930

April 10, 2026

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
12225 Wilkins Avenue
Rockville, Maryland 20852

RE: Brunswick Hydroelectric Project (FERC No. 2284), Diadromous Fish Behavior, Movement, and Project Interaction Study Schedule.

Dear Secretary Reese:

Brookfield White Pine Hydro LLC (BWPH), the license applicant for the Brunswick Hydroelectric Project, filed a letter on April 6, 2026, requesting a postponement of Phase 2 of the Commission's required Diadromous Fish Behavior, Movement, and Project Interaction study (Project Interaction Study) until the spring 2027 passage season.

BWPH asserts this postponement is necessary due to "on-going construction at the Frank J. Wood bridge," specifically the demolition of the old bridge, which they state will continue through May 15, 2026. The new Frank J. Wood bridge and the remaining old bridge structures are located immediately downstream of the Brunswick Project.

In 2018, we completed an Endangered Species Act section 7 consultation with the Federal Highway Administration and the U.S. Army Corps of Engineer's on the Maine Department of Transportation's (Maine DOT) replacement of the Frank J. Wood bridge. The project includes time of year restrictions limiting certain work to an August 1 – March 15 window. Due to weather conditions in the winter of 2026, this window was extended to April 7, 2026. We have no information suggesting any further in-water work is planned this spring. Furthermore, on March 11, 2026, Maine DOT representatives communicated that demolition of the old bridge is now expected to begin sometime in the fall of 2026.

BWPH also suggests that the presence of the work trestle and the support piles would create unrepresentative study conditions. We believe that these concerns are likely overstated, given the consistency of fish counts at the project before, during, and after bridge construction.

Brookfield acknowledges that by delaying the study, its Final License Application (FLA) will contain only 'preliminary' measures for upstream fish passage. This approach is fundamentally inconsistent with the intent of the Integrated Licensing Process (ILP), which is designed to ensure information needs are met before a license application is filed. Filing an application with preliminary measures denies resource agencies and stakeholders the opportunity to provide meaningful 'terms and conditions' based on a complete record, as intended by the ILP framework.



We respectfully request that you consider the information presented herein as you consider BWPH's request to delay the Project Interaction Study.

Sincerely,

A handwritten signature in cursive script that reads "Julia Crocker".

Julia E. Crocker
Chief, ESA Fish, Ecosystems, and Energy
Branch
Protected Resources Division

File Code: FERC Brunswick Relicensing