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10/12/26

VIA E-FILING

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

Re: Brookfield White Pine Hydro Brunswick, Maine Project (FERC P-2284) - Large Fish Kill

Dear Secretary Reese,

Ten years ago in October, 2016, Friends of Merrymeeting Bay (FOMB) reported a massive fish kill of out-migrating young of the year (YOY) river herring at Brookfield's Brunswick, Maine Project on the Androscoggin River. History has just repeated itself. In 2016 the cause of this extensive turbine mortality was thought to be release of YOY alewives from Sabattus Pond upstream, sending a pulse of fish downriver of which Brookfield received no advance notice. In subsequent FERC correspondence, Brookfield made clear that there would be better communication in the future between dam operators in Brunswick and Sabattus to prevent or at least minimize chance of recurring kills.

Yesterday, Sunday, October 11, FOMB was made aware there had been another fish kill of the same sort in Brunswick. Last night we emailed Brookfield's Mike Scarzello to make sure if he was not already aware of this that he would be, and could take necessary steps to shut down turbines. This morning we heard back from Mike:

Ed – yes, we received notification re Sabattus Lake annual drawdown and initiated nighttime shutdowns at Brunswick. Given the drought, the station is operating with one unit during the day, and Brookfield fisheries technicians will closely monitor the situation. Should the technicians observe a significant increase in mortalities we will shut down the last unit and allow all water to spill, just as with the nighttime shutdown protocol.

And this afternoon we heard back from Brookfield's Randy Dorman:

Just to clarify the sequence of events, we were informed on Friday morning that the Sabattus Public Works crew was lowering their pond for the season. Per our operating protocol we initiated a nighttime shutdown Friday night to provide safe passage.

Around 10:00 Saturday our fish techs noted a small number of mortalities below the project and based on that we began heightened monitoring of the area. The agencies were notified of these developments. By 14:00 we observed increased mortalities and initiated 24 hour shutdowns at 14:12. We have remained shut down since that time, and the primary route of passage has been spill over the spillway.

About the time Randy emailed back, we were out photographing thousands of turbine-killed alewives in a stretch of river from Pinette Landing Park upstream for approximately ½ mile along the south bank. Some photo documentation is below.

In normal conditions, the only way for migratory fish to pass downstream at Brunswick is through an 18" pipe with grate over the upstream end and flows of 40 cubic feet per second (cfs). This downstream passage is located immediately adjacent to the Unit 1 turbine with intake extending to the surface and with a throughput of 5,075 cfs. On the other side of the fish passage pipe are Units 2 and 3 with combined 2,672 cfs and entrances about 20' below the surface. Out-migrating fish, whether alewives, salmon, shad or eels follow maximum flows, leaving the designated pipe in this instance, with little chance of attraction success and all but ensuring passage through the turbines.

Turbine mortality occurs through decapitation, direct concussive strikes, and barotrauma. All of these examples were seen in the current kill. Similar mortality has been occurring on the Union River at the dam in Ellsworth, also owned by Brookfield.

FOMB has worked for years to ensure safe passage for migratory fish on the Androscoggin and Kennebec Rivers among others in Maine. The current kill is yet another example of how Interim Species Protection Plans fail to protect fish and once again just how inadequate Brunswick's fish passage facilities are, for safe passage downstream as well as upstream.

The Brunswick Project is currently undergoing relicensing and various up and downstream passage alternatives are being considered. This recurring kill emphasizes that all potentially safe passage possibilities must be thoroughly vetted, including and especially dam removal; since any time safe passage is dependent on human intervention, a certain amount of failure is inevitable.

Thank you,



Ed Friedman, Chair













Founded in 1975, Friends of Merrymeeting Bay (FOMB) utilizes research, education, advocacy, and land conservation to preserve, protect, and improve the unique ecosystems of Merrymeeting Bay and Gulf of Maine.