

March 27, 2026

Debbie-Anne A. Reese

Secretary

Federal Energy Regulatory Commission 888 First Street, N.E.

Washington, D.C. 20426

Electronically Filed

RE: Ripogenus Project (FERC P-2572) and Low Flow Comments

Dear Secretary Reese:

The following comments for Ripogenus Project (P-2572-133) are submitted on behalf of members of the Caribou Chesuncook Lake Camp Associations. We are writing in response to Brookfield's recent filing (Accession #: 20260319-5144) regarding low flow for the Ripogenus project.

The drought that has contributed to the current dire lake and river flow levels has been happening since the beginning of last summer (2025) (<https://www.drought.gov/states/maine>), yet little flow modifications were undertaken until now. Chesuncook Lake is at the same level (918 feet / 23.6 feet down) it was on March 15, 2019, the spring before the 2020-2021 drought, and 4 feet lower than it was on March 15, 2021 (923 feet) forecasting another recreational season of devastatingly low lake levels. The negative impacts of low lake and river levels on fish and aquatic life, and recreational users has been well documented throughout the relicensing process.

We appreciate the Licensees efforts to curtail flow at this point and their acknowledgment that the drought is expected to continue (<https://www.drought.gov/states/maine>) for the foreseeable future. We contend this current situation could have been alleviated by implementing a low flow regime last summer instead of waiting until the lakes were drastically low, threatening fisheries and other aquatic life as well as recreational activities.

On no day in the months of June, July or August of 2025 was the low flow plan of the current license (2200 CFS on Saturday and Sunday; 2000 CFS on Monday and Friday; 1800 CFS Tuesday through Thursday between the hours of 830 and 1700 cfs) implemented. Nightly releases last summer were far above minimum flows with as much as 3100 cfs from 7am -11 pm being released as late as August 17th. The current emergency situation could have been alleviated if a low flow regime had been implemented much earlier, and included minimum flows during non rafting hours.

For the immediate future we ask FERC to require flows no more than the minimum flow established during the spawning period of October 15 - November 15 2025, except for rafting flows on the weekends in the month of May and if necessary September (per ME PRO request) until the lakes are refilled. If the drought persists and lakes have refilled we would ask that Brookfield be required to follow the low flow plan we submitted (Accession #: 20250903-5023) which reduces minimum flows to 1,500 from McKay and 100 from RIP with a maximum outflow of 2,200 cfs until the drought is deemed over.

This dire situation clearly illustrates the profound need for a low flow plan with a rule curve based on lake levels be a required part of the new license. Operations models clearly demonstrate it is possible to hold lake levels stable while maintaining both rafting flows and flows that support fish, aquatic and littoral life. We have asked for, and have repeatedly demonstrated, that a balanced license can be achieved that provides generation while balancing the needs of all who rely on the river and lakes. We now realize that it will be up to FERC to require license conditions that achieve that balance.

Respectfully submitted,

Bill Houston, Spokesperson, Caribou and Chesuncook Lake Camp Associations

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