

November 14, 2023

Kyle Olcott
Hydropower Coordinator
Bureau of Land Resources
17 State House Station,
Augusta, Maine 04333-00017

Via e-mail

RE: Brookfield White Pine Hydro, LLC's, DEP Application # L-024307-33-G-N Rumford Falls Hydroelectric Project, for §401 State Water Quality Certification, (FERC Docket P-2333)

Dear Mr. Olcott:

Please accept these comments for inclusion into the record for the Maine Department of Environmental Protection's ("DEP") review of the application of Brookfield White Pine Hydro, LLC to receive a water quality certification ("WQC") for its Rumford Falls hydropower project.

Maine Rivers is a non-governmental organization ("NGO") whose mission is to protect, restore and enhance the ecological health of Maine's river systems.

Maine Rivers believes hydropower project license terms and conditions should be adopted to sustain natural resources and support all designated uses.

Rumford Falls, the highest waterfall in the United States east of Niagara Falls, operates under terms and conditions that appear to support electrical power generation at the expense of other designated uses, including scenic and recreational values. An obvious example of this is the dewatering of the upper falls by allowing a minimum for only 1 cfs at Upper Dam, and minimal flows over Middle Dam. To remedy this imbalance, Maine Rivers urges DEP to favorably consider the recommendations for new terms and conditions that non-government organizations (NGOs) have requested in previous communication.¹

Respectfully submitted,

Landis Hudson
Executive Director Maine Rivers

Chuck Verrill
President, Maine Rivers

¹ Inland Woods and Trails, the Appalachian Mountain Club, Maine Rivers, the Friends of Richardson Lake, and Maine Council of Trout Unlimited letter dated August 31, 2022, Subject: NGO Comments on the Draft License Application (DLA) and Updated Study Report (USR) for the Rumford Falls Hydroelectric Project (FERC No. 2333).