



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

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May 10, 2018

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**SUBMITTED ELECTRONICALLY**

**RE: Comments on the Proposed Study Plan for the Pejepscot Project, FERC No. 4784, Androscoggin, Cumberland, and Sagadahoc Counties, Maine**

Dear Secretary Bose:

The U.S. Fish and Wildlife Service (Service) has reviewed the Pejepscot Hydroelectric Project (FERC No. 4784-095) Proposed Study Plan (PSP) that was provided by the Licensee on February 12, 2018. The Project is located on the Androscoggin River in Sagadahoc, Cumberland, and Androscoggin Counties, Maine. The owner and operator of the Project is Topsham Hydro Partners Limited Partnership (Licensee).

The Project is located on the Androscoggin River in the village of Pejepscot and the Town of Topsham on the east shore and the Town of Brunswick and the Town of Durham on the west shore. The Pejepscot Project is the second barrier on the mainstem of the Androscoggin River. The first barrier, the Brunswick Project (P-2284), is located at the head-of-tide approximately 4.7 miles downstream of the Pejepscot Project. The third barrier, the Worumbo Project (P-3428), is located approximately 3.4 miles upstream of the Project.

### **Comments on the Proposed Study Plan**

The Service proposed two study requests:

- 1) Upstream and Downstream Fish Passage Effectiveness and Survival, and
- 2) White Sucker Passage and Migration Study

The Licensee proposes to conduct the fish passage study as requested by the Service. The Licensee does not intend to conduct the white sucker (*Catostomus commersonii*) study as requested by the Service. As explained in our letter from January 3, 2017, white suckers are the most abundant species by biomass in the Kennebec River and tend to migrate early in the spring. Migration timing and passage information is important to know so fishways can accommodate this species. In an April 3, 2018 email to the Licensee, my staff noted that in the most recent Pejepscot Fishway Annual report (2017), 212 white suckers were passed at the project. This new

information reduces the need for the requested two-year telemetry study. In the email my staff requested that the fishway be opened as soon as flows allow and it is safe. Once the fishway is operating, water temperature and numbers of white suckers passing are to be collected on a daily basis. The Licensee agreed to collect this information and provide it annually to the resource agencies.

### **Comments on National Marine Fisheries Service Proposed Studies**

The National Marine Fisheries Service (NMFS) proposed a number of studies. The NMFS's *Downstream Fish Passage Effectiveness and Survival: Behavior, Entrainment and Impingement at the Intake Study* was rejected by the Licensee. As indicated in the August 2017 Pejepscot PAD, the Maine Department of Marine Resources is actively engaged in the restoration of anadromous alewife (*Alosa pseudoharengus*), blueback herring (*Alosa aestivalis*), and American shad (*Alosa sapidissima*) in the Androscoggin River including the section of the river upstream and downstream of the Project. The Service supports implementing this study because the effectiveness of the downstream passage facility at the new powerhouse has never been evaluated and survival of fish through the project's turbines is not known.

Thank you for the opportunity to comment during the early planning stages of this Project. If you have any questions regarding this response, please contact Antonio Bentivoglio by email at [Antonio\\_Bentivoglio@fws.gov](mailto:Antonio_Bentivoglio@fws.gov) or by telephone at 207/781-8364 Extension 18 or at the above address.

Sincerely,

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