



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



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June 26, 2018

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

Subject: FERC 4787 – Pejepscot Hydroelectric Project  
Revised Study Plan Comments

Dear Ms. Bose:

On May 14, 2018, following a study plan meeting with Brookfield staff and their consultants, the Maine Department of Environmental Protection (MEDEP or Department) provided comments on a Proposed Study Plan (PSP) for the Pejepscot Hydroelectric Project. On June 12, 2018, the Department received for review and comment a Revised Study Plan for the Project, which revisions were based on those PSP comments.

#### General Comments on the Revised Study Plan

The Department appreciates the efforts of the applicant and their consultants in preparing the Proposed Study Plans for the Project. Project Study Plan (PSP) and the Revised Study Plan (RSP) documents. At the Study Plan meeting for the Project.

The applicant has proposed to conduct the water quality studies appropriate for the run-of-river conditions proposed to continue at the Pejepscot Project and requested by the Department, including a Trophic State Impoundment Study, a Temperature and Continuous Tailwater Monitoring Survey, and a Tailwater Benthic Macroinvertebrate Study. The Department has the following comments on the Revised Study Plan:

#### **Section 7.1.1 Water Quality Assessment**

1. The Department had no comments related to the Trophic State Impoundment Study.
2. The Revised Study Plan addresses the Department's Proposed Study Plan comments related to the Continuous Tailwater Monitoring Survey sufficiently to ensure that samples collected meet data quality objectives, and no additional comments are necessary.

#### **Section 7.1.2 Tailwater Benthic Macroinvertebrate Study**

3. The study plan proposed by the applicant conforms with the Department' sampling protocols and is expected to provide data sufficient to evaluate the impact of facility

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operations on the biotic community. The Department notes, however, that while footnote 6 indicates that “an extended exposure period for the deployed rock baskets may be necessary to allow for adequate colonization, should there be particularly low flow velocities at the sampling location”, such low velocity flows as would require the longer exposure time are limited to impoundments and are not applicable in a tailwater reach. The Department understands that the applicant is not suggesting it intends to use the longer exposure period, however, the Department wishes to clarify that at the chosen sampling location the longer exposure period does not apply.

The Department appreciates the effort that went into developing the water quality study plans for the Pejepscot Project and believes that this plan will provide data sufficient to evaluate any impacts to water quality caused by Project operations. We appreciate the opportunity to review and comment on the revised study plans. If you have any questions, please contact me by phone at (207) 446-2642, or by email at [Kathy.Howatt@maine.gov](mailto:Kathy.Howatt@maine.gov).

Sincerely,



Kathy Davis Howatt  
Hydropower Coordinator  
Bureau of Land Resources

Cc: Kelly Maloney and Frank Dunlap, Topsham Hydro Partners Limited Partnership  
Kirk Smith, Gomez and Sullivan Engineers