

Brookfield Renewable
150 Main St
Lewiston, ME

**RE: Whitewater Flow Proposal for Dam Relicensing – Comments from MEPRO
Whitewater Rafting Companies**

Dear Brookfield Renewable,

This letter represents the unified position of the four whitewater rafting companies collectively known as MEPRO (hereinafter referred to as "MEPRO") regarding whitewater flow proposals for the McKay Station relicensing process with the Federal Energy Regulatory Commission (FERC). We appreciate the opportunity to provide input as stakeholders in this important process.

MEPRO recognizes the complexities of balancing various interests during dam relicensing, particularly concerning water flow management. We understand the challenges presented by dry years and the need for adaptable flow regimes. Therefore, we have developed a proposal that aims to address these concerns while preserving the viability of our whitewater rafting operations.

Dates	MEPRO Proposal	
	Normal Year	Dry
May 1 - Friday prior to Memorial Day Weekend	2300 Sat/Sun	1700 daily
	2200 Mon/Fri	
	2000 Tues-Thurs	
Memorial Day Weekend Saturday - Labor Day Weekend Sunday	2300 Sat/Sun	2200 Sat/Sun
8:30-3pm	2200 Mon/Fri	2000 Mon/Fri
	2000 Tues-Thurs	1800 Tues-Thurs
Labor Day - Oct 1	2300 Sat/Sun	2200 Sat/Sun

On a dry year, our proposal focuses on a balanced approach, acknowledging the need for flexibility during certain periods while prioritizing consistent, suitable flows during our peak operational times. Specifically, we propose the following adjustments to the current flow regime:

- **May and September Flow Adjustments:** MEPRO proposes a reduction in flows during the months of May and September. We believe that strategically lowering flows during

these shoulder months will have minimal impact on recreational rafting while potentially alleviating water resource concerns.

- **Daily Recreation Flow Duration:** MEPRO proposes a reduction in the daily required recreation flow duration by two hours. We believe that a slightly shorter duration of consistent flows can still provide an excellent rafting experience while potentially conserving water resources.
- **Weekend Flow Priority:** Critically, MEPRO requests the maintenance of a minimum flow of 2200 cfs on Saturdays and Sundays throughout the entire rafting season, regardless of whether it is classified as a normal or dry year. Saturdays and Sundays represent our peak business days, accommodating the highest volume of rafters. A consistent 2200 cfs flow for our peak days assures the best experience for the majority of our guests. We believe prioritizing this flow level during these peak times is crucial for the economic sustainability of our businesses and the continued provision of recreational opportunities.
- **Weekday Flows:** MEPRO is requesting a continuation of the current license for weekday flows. Although 1800 CFS is a viable flow, the reality is that it's very slow and very rocky. The Penobscot River, even at 2200 cfs, is a long, full day of whitewater with slow stretches. On Tuesday-Thursday, we have limited operations, and so are able to cop with a flow of 1800 CFS. We believe the adjustments to May and September, along with the decrease in 2 hour/day of whitewater output, offers a reasonable compromise, allowing for potential water conservation during less busy periods while still providing adequate flows for rafting during our busiest periods.
- **Infrastructure Improvements:** In addition to flow adjustments, MEPRO strongly believes that improvements to access infrastructure are crucial for mitigating the challenges posed by fluctuating water levels in both wet and dry years. Specifically, we request that Brookfield Energy consider the following:
 - **McKay Station:** consistent maintenance on the put in ensures safe and adequate water access for recreational users. A representative from MEPRO could meet with Brookfield to ensure any updates and improvements are cost effective and sufficient for rafting use.
 - **Debsconeag Road Improvements:** Improving the condition of the Debsconeag Road will enhance access to the river and facilitate put-in and take-out activities on this lower section. On high water releases (3,600+ cfs) we are unable to safely run Ripogenus Gorge or the Cribworks. Access at Debsconeag could mean we run this lower section during high water events.
 - **Abol Bridge Access:** The creation of a dedicated put-in and take-out at Abol Bridge would provide an alternative access point, enabling different water access during periods of extreme high or low water. This additional access point would offer greater flexibility for rafting operations and enhance public access to the river.

MEPRO believes this proposal offers a responsible and balanced approach to whitewater flow management. It recognizes the need for flexibility during certain times of the year while prioritizing the critical need for consistent flows during peak recreational periods. We are hopeful that this proposal can help mitigate the impacts of dry years while ensuring the continued viability of whitewater rafting on the Penobscot River.

We are open to engaging in further discussions with Brookfield Renewable and other stakeholders to refine this proposal and reach a mutually beneficial agreement. We believe that collaborative solutions are essential for the long-term health of the river ecosystem and the continued success of recreational activities.

Sincerely,

The MEPRO Whitewater Rafting Companies,



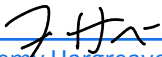
Matthew Polstein (Mar 11, 2025 21:09 EDT)

New England Outdoor Center



Jimmy Doria (Mar 11, 2025 14:56 EDT)

Three Rivers Whitewater



Jeremy Hargreaves (Mar 5, 2025 13:13 EST)

Northeast Whitewater



Suzanne Hockmeyer (Mar 6, 2025 08:55 EST)

Northern Outdoors



Emily Yeawood (Mar 5, 2025 13:12 EST)

Northern Outdoors

MEPRO-Brookfield-Proposal

Final Audit Report

2025-03-12

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