

Vladimir Douhovnikoff, Brunswick, ME.

September 25, 2026, VIA E-FILING

Debbie-Anne A. Reese, Secretary, Federal Energy Regulatory Commission

888 First Street, N.E., Washington, D.C. 20426

RE: Brunswick Hydroelectric Project (FERC No. 2284). Comments on the Phase 1 Upstream and Downstream Conceptual Alternatives Studies released on 9-2-26 and 9-4-26 respectively.

Dear Secretary Reese:

I am Vladimir Douhovnikoff PhD., an Associate Professor in the Biology Department at Bowdoin College. Over the years, my research has included the study of riparian ecology including questions on the influence of dams on downstream ecosystems. I teach the River Ecology and Management course at Bowdoin College and supervise students in researching the local impacts of the Brunswick Hydroelectric Project. Over the last year I have committed my research time and lab resources to study the Brunswick Project. My comments represent the consensus of my lab and its collaborators which includes specialists in hydrology, geomorphology, and ecology. I respectfully submit these comments on the Phase 1 Upstream and Downstream Conceptual Alternatives Studies released on 9-2-26 and 9-4-26 respectively in conformance with the Commission's Criteria for Modification of Approved Study (18 C.F.R. § 5.15(d)).

These comments were prepared in collaboration with Free The Andro and submitted separately by both.

1. We concur with the conclusions from both reports that "...advancing the full suite of viable alternatives into Phase 2 aligns with the study objectives".

2. We emphasize the need for adaptive approaches focused on mandated targets. All alternatives are identified as having some risk of failure. Mandated targets ensure that selecting and applying a single alternative is not the end of Brookfield's obligation. The continuing goal is quantifiable sustained fish passage. This has not been clearly stated in any of the study documents.

3. No fish passage targets have been established for evaluation of alternatives in review. Passage targets are essential in order to right-size design and properly evaluate and compare the effectiveness and appropriateness of all alternatives in consideration.

4. In evaluation of Alternative U3 (Fishlift), values for possible design capacity were provided. These values propose a fish passage capacity approximately half those suggested by MDMR in their April 9, 2026 comments on the upstream alternatives. No logic or justification was provided for the values used. Any future passage capacity parameters to be used should be based on available data and through consultation with the appropriate agencies, experts and stakeholders. We support using the values derived in the MDMR analysis and submitted April 9, 2026.

5. Design parameters still include fish trapping and sorting on all alternatives except the Alternative U5 (NLF). We suggest a discussion of the cost benefit and the justification for this constraint is warranted as it will have an impact on the evaluation of optimal alternatives.

6. The Upstream report Appendix D Figure U5 depicts a proposed NLF design. We emphasize that this depiction represents what could be a worst-case scenario from an engineering effort perspective. Further study may suggest the possibility of on-site opportunities to minimize engineering effort and take advantage of preexisting channel features likely used by fish before the dam was constructed.

7. Alternative U5 (NLF) was only considered as an upstream passage option. However, an in-channel NLF would have the advantage of providing both upstream and downstream volitional passage. As such,

going forward, we assert that any cost-benefit assessment of this option will have to account for the total contribution this alternative provides.

8. By isolating consideration of alternatives to Upstream and Downstream categories, these reports fail to address the potential tradeoffs of different combinations of passage. As stated in the reports, upstream and downstream improvements will both be necessary. Going forward, we assert that addressing the potential interactions and cost-benefits of possible passage combinations is essential as no alternative will be applied in isolation of the cumulative design.