

Brookfield

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November 7, 2016

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

**RE: Project No. 2284; Brunswick Project
Brookfield White Pine Hydro LLC**

Dear Secretary:

Brookfield White Pine Hydro LLC (BWPH), the licensee for the Brunswick Project, is writing to respond to an October 28, 2016 press release filed with the Commission by the Friends of Merry Meeting Bay (FOMB).

Background:

On Sunday, October 16, the Brookfield contact phone line received a report from a representative of FOMB about some juvenile river herring mortalities observed below the Brunswick Project on Saturday October 15 and Sunday, October 16. In response, a BWPH river operations crew member visited the site in the early evening of Sunday, October 16, 2016 and observed some juvenile fish mortalities at the Brunswick boat ramp below the Project and did not observe any bird feeding activity or fish mortality in the turbine discharge.

On the morning of Monday, October 17, a BWPH environmental employee arrived on site and collected approximately 1,300 juvenile river herring mortalities below the Project. No other fish species mortalities were collected and BWPH did not observe any ongoing fish mortality in the Project tailrace at the turbine discharge. That afternoon, BWPH conducted a conference call with Maine Department of Marine Resources (MDMR) and Maine Department of Environmental Protection (MDEP) personnel to inform them of the occurrence and of BWPH's intended course of action. Based on the unusually large numbers of juvenile river herring in the water during this brief period of time, that same evening (Monday, October 17), BWPH implemented turbine shutdowns targeting the dusk to dawn hours (7 p.m. - 7 a.m.), which continued for the remainder of the week, in an effort to mitigate further mortalities. It should be noted that the facility was experiencing an outage of its larger, slower unit 1 on these same dates and that only the smaller, faster units 2 and 3 were periodically online during this period.

Shoreline and turbine discharge surveys below the Project were conducted daily throughout the following week (October 18 through 23) by BWPH environmental personnel and no new shoreline or turbine discharge mortalities were observed. Periodic shoreline and turbine discharge surveys were also conducted during the following week (October 24 through 31) and no new mortalities were observed.

Normal operations were resumed at the Project on Saturday, October 29.

Unique Circumstances Identified in Discussions with MDMR and MDEP:

As noted above, on October 17, 2016, BWPH conducted a conference call with MDMR and MDEP personnel where the occurrence was discussed. From these discussions, it appeared that the juvenile river herring encountered at the Brunswick Project were fish that had out migrated from Sabattus Lake starting on October 8 when the Sabattus Lake Association released water for the annual lake drawdown.

MDMR noted that it annually captures adult river herring from the BWPH Brunswick Project Fishway and transports these fish to Sabbattus Lake, which is the largest spawning lake for river herring in the Androscoggin River basin. MDMR estimates that approximately 8 million to 10 million juvenile river herring were present in Sabbattus Lake this year and that the majority of them moved out with the discharge of water associated with the annual lake drawdown. Limited rain events, associated drought conditions and low water conditions encountered this year have resulted in reduced periodic spill events at the Sabbattus Lake dam that would generally occur under normal conditions. During normal spill events under normal hydrological conditions, juvenile river herring would leave the lake sporadically in smaller groups throughout the migration season starting in late summer into the fall. Instead, MDMR suspects that a very large number of juvenile river herring left the lake at the same time starting on October 8 with the Sabbattus Lake Association drawdown event and arrived at the Brunswick Project later on that week.

BWPH believes that the limited number of juvenile river herring mortalities observed on October 15th, 16th and 17th 2016 was a very unusual occurrence due to the unique circumstances described above. BWPH is not aware of any similar fish mortality occurrence reported by the public or observed by BWPH or its predecessor in the past.

Continued Approach:

BWPH took immediate action to minimize the likelihood of continued mortalities and improve downstream passage conditions at the Project and those efforts seem to have been successful as no additional mortalities have been observed at the Project for the following two week period. BWPH has and will continue to monitor the Project and downstream areas for the next two weeks and will continue to provide weekly fish passage reports to the resource agencies. BWPH believes that through the actions described above, it is taking diligent and appropriate actions to minimize fish mortalities at the Project.

If you have any questions regarding this filing, please contact Bob Richter at (207) 242-5001 or at robert.richter@brookfieldrenewable.com.

Sincerely,



Kelly Maloney *For*
Manager, Licensing and Compliance

Cc: R. Richter, J.Trudell, A. Zarrella, P. McDonough, S. Michaud, J. Seyfried, K. Bernier; BWPH

J. Perry; MDIFW
K. Howatt; MDEP
M. Brown, O. Cox; MDMR
S. Shepard, A. Bentivoglio; USFWS
J. Murphy, D. Tierney, M. Buhyoff; NMFS

M. Pawlowski; FERC

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