



City of Auburn, Maine

Office of Planning & Permitting

Eric Cousens, Director

60 Court Street | Auburn, Maine 04210

[www.auburnmaine.gov](http://www.auburnmaine.gov) | 207.333.6601

January 11, 2022

Ms. Kimberly D. Bose

Secretary Federal Energy Regulatory Commission

888 First Street, N.E.

Washington, D.C. 20426

**Via online submission to: <http://www/ferc.gov>**

**Subject: Comments of the Cities of Lewiston and Auburn Maine Regarding the Gulf Island – Deer Rips/Androscoggin No. 3: Article 407: Project Operation and Flow Monitoring Revised Plan Project (P-2283) and operational connection to the relicensing of Lewiston Falls/Monty Hydro (P-2302)**

Dear Secretary Bose:

The City of Auburn submits the following Comments regarding the filing Brookfield White Pines Hydro LLC (BWPH) Gulf Island – Deer Rips/Androscoggin No. 3: Article 407: Project Operation and Flow Monitoring Revised Plan Project (P-2283) dated September 3, 2021.

The City of Auburn, located in central Maine, an industrial center and the ninth largest city by land area in the United States with 67 square miles, is a corridor to the western recreational mountains of Maine and is home to more than 25,000 residents. The City of Lewiston is located on the opposite bank of the Androscoggin River and with Lewiston's population of 37,121, they are home to over 60,000 residents. Lewiston-Auburn is the region's economic and cultural center, serving Androscoggin County and the large trade area of central and western Maine. Given its size alone, Lewiston-Auburn's success is important to Maine's economic development.

The cities are currently engaged in the relicensing process for the Lewiston Falls Project (P-2302) and submitted three FERC Study Requests on December 31, 2021. These study requests all involve flows, and when we received eSubscription notification of the revised flow monitoring plan for the Gulf Island Project on the same day, we realized that it had significant bearing on the Lewiston Falls Project. With Deer Rips only some 2.5 miles upstream and Gulf Island 1.5 miles above that, while Lewiston Falls is "run of river," the water that goes over Lewiston Falls is controlled by a combination of what is released upstream and how much of it is directed through Lewiston Falls/Monty Station turbines. We hope and expect that the relicensing of Lewiston Falls will result in the falls being

watered with greater frequency for the recreational, aesthetic, and environmental improvement that this would provide, and the greatest control over the flows will be exerted by the dam upstream with the largest reservoir by far: Gulf Island. To try to manage additional releases over Lewiston Falls using only waters from that reservoir would likely result in impoundment water levels varying greatly causing environmental harm to the littoral zone that is not permitted by Maine environmental statutes; it would also complicate recreational use of that impoundment.

Accordingly, we request that the revised flow plan and the impacts of associated flows be considered as part the relicensing of Lewiston Falls (P-2302). Per Article 407 of the Gulf Island (P-2283) License, "*The Commission reserves the right to require changes to the plan*", and we further request that the Commission set a review date for review and reconsideration of the flow plan as part of the Lewiston Falls license prior to the expiration date of 8/31/2026.

Respectfully,



City of Auburn

Eric J. Cousens

Additional Distribution: FERC Dockets P-2302 and P-11006, Luke Andersen, Licensing Manager Brookfield