



## City of Auburn, Maine

Office of Planning & Permitting

Eric Cousens, Director

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September 2, 2021

VIA E-FILING

Kimberly D. Bose, Secretary

Federal Energy Regulatory Commission

888 First Street, N.E.

Washington, DC 20426

**RE: Lewiston Falls Hydroelectric Project (FERC No. 2302) City of Auburn Maine Objection to TLP Request**

Dear Secretary Bose:

Pursuant to Section 15(b)(1) of the Federal Power Act, 16 U.S.C. § 808(b)(1), Brookfield White Pine Hydro LLC (BWPH) has electronically filed with the Commission the Notice of Intent to File a License Application (NOI) on August 4, 2021. The filing was not forwarded to listed stakeholders on that date but was later sent to stakeholders via email on August 10, 2021. The filing includes a request for the use of the FERC's Traditional Licensing Process (TLP) for the relicensing of the Project.

**The City of Auburn respectfully requests that FERC deny the request to use the TLP and require the Integrated Licensing Process (ILP) for the relicensing of this project of Statewide significance.**

The project is located on the Androscoggin River in the cities of Auburn and Lewiston in Androscoggin County, Maine. The Project's existing license was issued on September 29, 1986 and expires on August 31, 2026. The project is located on Maine's third largest river, has had a licensed generating capacity of up to 35.6 MW and is at the center of the Cities of Auburn and Lewiston's Downtowns in Maine's second largest metropolitan area. The license has recently been modified to reduce project area, generating capacity and transfer canal ownership to the City of Lewiston.

Past recreation plans are inadequate to meet the needs of the adjacent communities and will require significant study and public involvement to mitigate project impacts. During the term of the current license the positive impacts of Senator Muskie's Clean Water Act have significantly changed the recreation potential and demand for access to the resources affected by the project. More recently, in the last 2 years, we have seen a significant increase of in migration to the State of Maine and Auburn/Lewiston in particular for the first time in decades. The Androscoggin River, within the project area, can provide recreational access to residents in adjacent low-income census tracts without access to vehicles for transportation and has become a significant attraction for Maine residents and out of State visitors alike.

The TLP will not be adequate for a project of Statewide significance located in the second most populous region of the State with many unknown project impacts and early involvement of FERC staff in the ILP will help ensure an appropriate outcome. The City of Auburn urges FERC to require the ILP for the relicensing process.

Sincerely,

A handwritten signature in black ink that reads "Eric Cousens".

Eric J. Cousens

Director of Planning and Permitting