Brookfield
Renewable U.S.

March 30, 2023

Bar Mills Project
FERC No. 2194-ME

Kimberly D. Bose Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Bar Mills Project (FERC No. 2194-ME) Updated Plan and Schedule to Surrender License and Decommission Project

Dear Secretary Bose:

Brookfield White Pine Hydro LLC (BWPH), licensee for the Bar Mills Project, FERC Project No. 2194 (the "Project") on the Saco River in Maine, is providing an updated plan and schedule to decommission the Project following BWPH's October 12, 2021 plan and schedule, which was acknowledged by FERC by letter dated July 19, 2022.

Since that time, in support of the Surrender Application and Decommissioning Plan for the Bar Mills Project, BWPH has revised the proposed schedule to allow sufficient time for studies, identified in consultation with the agencies and stakeholders. BWPH distributed the revised process plan and schedule to the agencies and stakeholders on December 5, 2022 and posted the schedule to the Bar Mills Decommissioning website (https://barmills.brookfieldusprojects.com/). No comments were received on BWPH's proposed revised schedule. BWPH anticipates distributing a draft Study Plan, the next major milestone on BWPH's proposed revised schedule, to the agencies and stakeholders in the coming weeks.

Should any further modifications of the above schedule be necessary, BWPH will notify and update FERC accordingly.

Sincerely,

Kelly Maloney
Senior Manager, Compliance – Northeast

Attachments: Revised Process Plan and Schedule
Proposed Resource Issues and Study Schedule
December 5, 2022 email correspondence to agencies and stakeholders

Cc: S, Michaud, N. Stevens, D. Heidrich, J. Clere, J. Seyfried, M. Leblanc, J. Rancourt, K. Pocquette, C. Goodhart, M. Ward, C. Karam; BWPH

A. Qua, K. Cooley; Kleinschmidt Associates

J. Lyons, J. Spain; FERC-NYRO

HSSE Managed System: 2194|01

BROOKFIELD WHITE PINE HYDRO LLC
150 Main Street, Lewiston, ME 04240
T +1 207.755.5600 F +1 207.755.5655 brookfieldrenewableUS.com

Revised Process Plan and Schedule

Responsible Party	Pre-Filing Milestone	Date/Time Frame
BWPH	Issue Preliminary Scoping Document	August 2, 2022
All Stakeholders	Preliminary Informational Meeting	August 2, 2022
All Stakeholders	Scoping Document Comments Due	September 1, 2022
BWPH	Issue Preliminary Proposed Study List	December 5, 2022
All Stakeholders	Additional Study Requests Due	30 days following issuance of study proposal list (January 4, 2023)
BWPH	Issue Draft Proposed Study Plan (PSP)	Early 2023
All Stakeholders	Draft Proposed Study Plan Meeting (as needed)	30 days following issuance of PSP
All Stakeholders	Draft Proposed Study Plan Comments Due	60 days following issuance of PSP
BWPH	Finalize Study Plan	30 days following receipt of comments
BWPH	First Study Season	2022-2023
BWPH	Issue Draft Study Report (DSR)	Late 2023
All Stakeholders	Initial Draft Study Report Meeting (as needed)	30 days following issuance of DSR
All Stakeholders	Draft Study Report Comments Due	60 days following issuance of DSR
BWPH	Revise Study Plan (if necessary)	2024
BWPH	Second Study Season (if necessary)	2024
BWPH	Issue Preliminary Decommissioning Proposal/Draft Surrender Application	Late 2024
All Stakeholders	Preliminary Decommissioning Proposal/Draft Surrender Application Comments Due	90 days following issuance of Draft Application
BWPH	File Final Decommissioning Plan and Surrender Application	Mid-2025

Proposed Resource Issues and Study Schedule

In support of the Surrender Application and Decommissioning Plan for the Bar Mills Project, Brookfield White Pine Hydro LLC (BWPH), in consultation with the agencies and based on feedback garnered via public outreach, has compiled the following list of resource issues and studies to be conducted in 2022 and 2023. Results will be incorporated into the environmental assessment that accompanies the Surrender Application (Exhibit E).

BWPH requests that any additional study requests be provided in writing by January 4, 2022. Requests may be submitted to BarMills@kleinschmidtgroup.com.

- **Geology and Soils**
    - Sediment Transport – a reconnaissance level investigation of sediment quantity and potential post-breach transport. This study will be conducted in the Winter 2022 – Spring 2023.
    - Erosion – an evaluation of post-breach impoundment and downstream conditions regarding potential erosion will be conducted. Shoreline characterization using soil maps evaluated for such properties as K factor, T factor and wind erodibility will be evaluated for the impoundment and areas downstream that may experience higher erosive velocities in the post-removal condition. This study will be conducted in the Winter 2022 – Spring 2023.
- **Water Quality and Quantity**
    - River Elevations – BWPH has completed a river elevation model of the reach from Bar Mills Dam to the upper limit of the existing impoundment just downstream of West Buxton. The results can be found here: https://experience.arcgis.com/experience/0e26d508492e418a95aa7639de8c2ef0/
    - Water Quantity – an inventory of existing water withdrawals or discharges in the impoundment will be compiled, including water-supply wells within a defined radius of the impoundment. This will serve as a basis to conceptually evaluate potential effects of lowered water levels in the post-breach condition on ground water elevations in properties and documented wells within the zone of influence. This study will be conducted in the Winter 2022 – Spring 2023.
    - Water Quality – an assessment of potential water quality conditions will be evaluated as hydrology transitions from lacustrine to lotic conditions. A metadata review of existing baseline water quality data will be compiled (including prior relicensing studies and ongoing existing water quality monitoring data from the state, SRCC and other sources) and assessed against State parameters for a Class A waters including DO, temperature and E. coli. The compiled data and assessment will be summarized in report form in the Winter 2022 – Spring 2023.
- **Fisheries**
    - Resident and Anadromous Species and Habitats – a metadata review of existing baseline fisheries information will be conducted and summarized including from relicensing

studies conducted at other assets on the Saco River and a discussion of lacustrine habitat transition. An evaluation of zone of passage for depth and velocity in the vicinity of the proposed breach was completed as part of HEC-RAS modeling of post-breach conditions. This study will be conducted in the Winter 2022 – Spring 2023.

- Tributary Connectivity – a field assessment of zone of passage in water depth and velocities for tributaries to the Bar Mills impoundment under post-breach confluence conditions will be conducted in Spring – Summer 2023. This assessment will include field measurements of impoundment tributaries to determine the location of the first hydraulic control relative to modeled post- breach impoundment elevation.

- **Wildlife and Botanical Resources**
  - Species and Habitats – a metadata review of wildlife species and a reconnaissance level evaluation of existing upland, littoral and riverine habitats will be conducted in Spring 2023 – Summer 2023. This will include field verification of historic characterizations from the prior FERC relicensing via observations by boat.
  - Wetlands – A review of US Fish and Wildlife Service (USFWS) mapped wetlands and wetland mapping from the prior relicensing, coupled with a reconnaissance level field verification to establish baseline wetlands conditions in the pre-breach scenario will be conducted in Spring 2023 – Summer 2023. This will include field verification of wetland mapping via observations by boat and assessment of potential effects on wetland connectivity and classification type under post- breach water level.
  - Endangered Species – Inquiries to develop a potential state and federal threatened and endangered wildlife and botanical resources list will be conducted using USFWS Information for Planning and Consultation (IPac), and Maine Department of Inland Fisheries and Wildlife (MDIFW) and Maine Natural Areas Program (MNAP) inquiries in Winter 2022. Observations of the presence of listed species and suitable habitats will be recorded during field efforts conducted for the wildlife and wetlands surveys. Should listed botanical species be identified by MNAP, field reconnaissance to confirm presence/absence will be conducted in the Spring – Summer 2023.

- **Cultural/Historic Resources**
  - Cultural Resources – Three pre-European archaeological sites identified as eligible for listing in the National Register of Historic Places are currently managed under BWPH's Historic Properties Management Plan (HPMP), therefore no additional study is proposed, although BWPH will consult with the State Historic Preservation Officer (SHPO) to determine if adjustment to current management practices may be necessary post-breach. No historic structures are affected by the project currently and are located in upland areas that would be unaffected by post-breach reduction in water elevations.

- **Recreation, Land Use and Aesthetics**
  - Recreation Use and Needs – A summary of existing recreation opportunities within the project impoundment will be provided based upon an assessment of use and needs conducted during the Summer of 2022, including user surveys that indicate an estimate of annual use and an assessment of opinions on crowding and condition at the existing boat

launch. An evaluation of conditions in the post-breach scenario will be conducted concurrent with other upland studies in Winter 2022 utilizing the river elevation model of the impoundment.

- Land Use – A modeled assessment of potential additional shoreline lands under the post-breach condition will be conducted in Winter 2022. Hydraulic modeling for the river elevation model of the impoundment will be utilized to quantify additional shoreline lands under modeled water level and river flow conditions. Past land use will also be further considered and evaluated towards informing and planning site specific decommissioning activities.
- Aesthetics – An assessment of pre-and post-breach aesthetic conditions in the viewshed including post-breach renderings will be completed in Winter 2022.

The aforementioned studies will be compiled into a Proposed Study Plan to be circulated for agency review and comment during early 2023. BWPH anticipates a 60-day period for agency and stakeholder review of the Proposed Study Plan and an opportunity for additional study requests that address the criteria outlined in 18 CFR Section 5.9(b).

From:	Seyfried, Jason
To:	kyle.olcott@maine.gov; james.pellerin@maine.gov; peter_lamothe@fws.gov; william.mcdavitt@noaa.gov; dalyn@srcc-maine.org; bjorn.lake@noaa.gov; casey.clark@maine.gov; jesus_morales@fws.gov; john.perry@maine.gov
Cc:	Heidrich, David; Maloney, Kelly; Reny, Melissa; Karam, Chris; Leblanc, Matthew; Goodhart, Cameron; Rancourt, Joel; Anderson, Luke; Pocquette, Kayla; Michaud, Steve; Stevens, Nate; "Andy.Qua@KleinschmidtGroup.com"; Kevin Cooley
Subject:	Bar Mills Project (FERC No. 2194-ME) Decommissioning Schedule of Studies
Date:	Monday, December 5, 2022 3:43:57 PM
Attachments:	image001.jpg Bar Mills Website Schedule Update Final 20221205.pdf Bar Mills Process Plan and Schedule Final MR.pdf

---

Good afternoon,

In support of the Surrender Application and Decommissioning Plan for the Bar Mills Project, Brookfield White Pine Hydro LLC (BWPH), has compiled the attached list of resource issues and studies to be conducted in 2022 and 2023, garnered through public outreach. BWPH will compile these studies into a Proposed Study Plan, which will be circulated for review and comment in early 2023. A meeting to discuss the Proposed Study Plan will be scheduled within 30 days following issuance of the document and comments on the Proposed Study Plan will be due within 60 days following issuance.

Should you have any additional requests for study, we ask that they be submitted within 30 days (by Friday, January 6, 2023) so that they may be considered for inclusion in the draft Proposed Study Plan. Requests may be submitted to BarMills@kleinschmidtgroup.com. Any requests for additional studies should follow 18 CFR 5.9.

BWPH will be posting this list of proposed studies to the Bar Mills Decommissioning website (https://barmills.brookfieldusprojects.com/) later this week. In addition, BWPH will post the attached preliminary process plan and schedule.

Should you have any other questions or concerns, please let me know.

Thank you,

Jay Seyfried
Compliance Specialist

Brookfield Renewable
150 Main Street, Lewiston, Maine, 04240
Office (207) 755-5615 Mobile (207) 312-8323
jason.seyfried@brookfieldrenewable.com
www.brookfieldrenewable.com

View Important disclosures and information about our e-mail policies here.