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Admitted in: MA, ME, NH

July 23, 2021

The Honorable Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Room 1A, East
Washington, DC 20426

Re: Shawmut Hydroelectric Project, P-2322-069
Comments on Draft Environmental Assessment

Dear Secretary Bose:

Please accept these comments on behalf of Sappi North America, Inc. ("Sappi") on the Draft Environmental Assessment (DEA) issued on July 1, 2021 in the above-captioned docket. We previously submitted comments by letter dated March 29, 2021, which the DEA references on page 191. Specifically, the DEA states that "removing the dam could lower the water levels to a point that the mill's intake would not be functional and the diffuser for discharging its wastewater would be too close to the water surface to function properly." This is true, and it is important to add that it would cost in excess of \$50 million to remediate these impacts – if such remediation is even possible – and that such remediation likely would take two or more years to design, permit, and construct, and therefore may result in significant downtime at the facility.

Thus, removal of the Shawmut Dam – or imposition of uneconomic conditions that would effectively require dam removal through license surrender – would have potentially devastating economic effects on Sappi's Somerset Mill, its employees, and its suppliers, and thus a similarly devastating impact on the surrounding communities whose economies rely to a large extent on the Somerset Mill. Sappi fully supports the DEA's conclusion that reasonable protection, mitigation, and enhancement measures can be fashioned – as outlined in the DEA – to support the recovery of diadromous fish in the basin and still provide for the generation of power, and that decommissioning therefore is not a reasonable alternative to relicensing.

Thank you for your consideration of these comments.

Sincerely,



Matthew D. Manahan

cc: FERC Service List (certificate of service attached)
Matt Cutlip, matt.cutlip@ferc.gov
Kathy Howatt, Maine DEP

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Portland, Maine this day: July 23, 2021



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