

MATTHEW D. MANAHAN

Merrill's Wharf
254 Commercial Street
Portland, ME 04101

P 207.791.1189
F 207.791.1350
C 207.807.4653
mmanahan@pierceatwood.com
pierceatwood.com

Admitted in: MA, ME, NH

September 27, 2022

VIA ELECTRONIC MAIL: ShawmutWQC.DEP@maine.gov

Kyle Olcott
Hydropower Coordinator
Bureau of Land Resources
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017

Re: Shawmut Hydroelectric Project Water Quality Certification Application, Brookfield
White Pine Hydro LLC, L-019751-33-I-N

Dear Kyle:

Please accept these comments on behalf of Sappi North America, Inc. ("Sappi") on the additional information submitted by Brookfield White Pine Hydro on September 22, 2022. The supplemental fish passage measures proposed by Brookfield should allow the Department to promptly approve water quality certification for the Shawmut Hydroelectric Project. These measures strike the right balance by improving fish passage at Shawmut without hurting the Sappi Somerset Mill's operations by reducing water levels in the impoundment behind the dam. Because they are discrete and straightforward supplements to Brookfield's existing proposal for fish passage, Sappi encourages the Department to promptly review them and issue water quality certification. Prompt approval will remove the threat to the mill's critical infrastructure and provide the mill and its workforce with the comfort that it can survive and thrive for decades to come.

Thank you for your consideration of these additional comments.

Sincerely,



Matthew D. Manahan

cc: James Brooks
Briana O'Regan, Esq.