



# Maine Forest Products Council

*The voice of Maine's forest economy*

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October 16, 2025

Laura Paye  
Hydropower & Dams Program Coordinator  
Bureau of Land Resources  
Maine Department of Environmental Protection  
Laura.Paye@maine.gov  
[DEP-Hydropower@maine.gov](mailto:DEP-Hydropower@maine.gov)

## **Re: Comments on the Lower Kennebec Draft Water Quality Certification**

Dear Ms. Paye,

On behalf of the Maine Forest Products Council, we appreciate the opportunity to provide comments on the Maine Department of Environmental Protection's (DEP's) October 9, 2025 draft Water Quality Certification (WQC) for the Shawmut, Lockwood, Hydro Kennebec, and Weston Hydroelectric Projects on the lower Kennebec River.

Earlier this year, nearly 100 employees of Sappi North America submitted comments encouraging DEP to issue a WQC that would support the continued operation of the Shawmut Hydroelectric Project (Shawmut). We share their concern that any decision requiring substantial modification of the Shawmut Dam and impoundment, or that renders its continued operation economically unfeasible, could have serious implications for the future of Sappi's Somerset Mill and the broader Central Maine economy.

The conditions imposed in the draft WQC appear to go well beyond those required by the Federal Energy Regulatory Commission (FERC) following its comprehensive environmental assessment and Environmental Impact Statement. Some of these conditions may be technically impracticable or economically prohibitive, and in certain cases, could have limited benefit to aquatic habitat or unintended consequences for endangered Atlantic salmon. As currently written, the draft WQC sets a standard that may be unrealistic and could effectively prevent the relicensing of the Shawmut Dam.

The Somerset Mill is a critical economic engine for Skowhegan, the surrounding region, and the state of Maine. It provides over 700 good-paying jobs to Maine people and represents a significant portion of the local tax base—39 percent of Skowhegan's in 2021. As the largest remaining pulp mill in the state, the Somerset Mill is a vital part of Maine's forest economy supply chain, supporting landowners, loggers, truckers, and many others. The ripple effects of a potential closure would be felt across the industry and throughout the region. In addition to supporting local businesses such

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as restaurants and gas stations, the mill is directly tied to Maine's logging industry through its demand for wood products. According to a 2025 study by the Maine Forest Products Council, the forest products industry contributed \$8.3 billion to Maine's economy. Sappi Somerset, and recent significant investments at this facility, are integral to the health of the entire forest industry.

The recent announcement of a proposed sale of the Shawmut Dam and three other lower Kennebec River dams to The Nature Conservancy (TNC) adds further complexity. TNC has publicly stated its goal of restoring free-flowing conditions to the river through a combination of dam decommissioning, removal, and other efforts. While we appreciate TNC's recognition of the Somerset Mill's importance and its commitment to developing a solution that addresses the Mill's long-term water system needs, we believe it is important that regulatory decisions not be based on assumptions about future dam removal.

Unless all parties reach agreement on a river restoration plan that maintains the impoundment created by the Shawmut Dam, thereby ensuring the continued viability of the Somerset Mill, it should be the shared objective of all stakeholders to pursue relicensing under reasonable and achievable conditions. In the last legislative session, a bipartisan group of legislators in the Environment and Natural Resources Committee sent a letter highlighting their concerns to DEP addressing this very issue and encouraging the consideration of the importance of the Sappi Somerset Mill to the community.<sup>1</sup> This approach would support continued operation of the dam as intended by both TNC and Brookfield, and would align with the many public statements made by government officials in support of the mill and its role in Maine's economy.

We respectfully urge DEP to reconsider the draft WQC and work collaboratively with all stakeholders to develop a balanced, science-based, and economically viable path forward. We remain committed to working together to find solutions that protect Maine's natural resources while also supporting the communities and industries that depend on them.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Krysta West". The signature is written in a cursive, flowing style.

Krysta West

Executive Director

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<sup>1</sup> Letter from the Maine Legislature's Environment and Natural Resources Committee on LD 1210. <https://maineforest.org/wp-content/uploads/2025/07/LD-1210-committee-letter-to-DEP-DRAFT.pdf>. May 14, 2025.