

August 27, 2026

Laura Paye
Hydropower Coordinator
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

**Subject: Penobscot Mills Hydroelectric Project (FERC No. P-2458)
Section 401 Water Quality Certification – Certification Request**

Dear Ms. Paye:

Great Lakes Hydro America, LLC (GLHA or Applicant) is herein submitting to the Maine Department of Environmental Protection (Department) an Application for Water Quality Certification (WQC) for the Penobscot Mills Hydroelectric Project (Penobscot Mills Project), which is undergoing relicensing by the Federal Energy Regulatory Commission (Commission or FERC) as FERC Project No. 2458, using the Commission's Integrated Licensing Process (ILP). GLHA is the project proponent for certification under Section 401 of the Clean Water Act (CWA), the Commission is the federal agency, and the Department is the certifying agency. The Penobscot Mills Project is located in Piscataquis and Penobscot Counties, Maine on the West Branch of the Penobscot River and Millinocket Stream.

On September 30, 2024, GLHA filed its Final License Application (FLA) for the Penobscot Mills Project with the Commission, which issued its Notice of Application Ready for Environmental Analysis and Soliciting Comments, Recommendations, Terms and Conditions, and Prescriptions (REA Notice) on June 29, 2026. This WQC application is in support of obtaining a new license for the continued operation of the Penobscot Mills Project.

Under the current rules for CWA Section 401 reviews (2023 Clean Water Act Section 401 Water Quality Certification Improvement Rule or "Final Rule"), an applicant is required to request a pre-filing meeting with the applicable State agency at least 30 days prior to filing for certification (40 CFR § 121.4). GLHA submitted a request for a pre-filing meeting with the Department on July 9, 2026, regarding its intent to file this WQC Application. The Department met with GLHA on July 15, 2026, for the pre-filing meeting, via teleconference, to discuss the WQC application process and verify application filing procedures and the application content.

Further, in accordance with the Final Rule, GLHA provides the below information in connection with this WQC request (see Final Rule, at 40 CFR § 121.5):

GREAT LAKES HYDRO AMERICA, LLC

1024 Central Street, Millinocket, ME 04462

T +1 207.723.4341 F +1 207.723.4597 brookfieldrenewableNA.com

a) A certification request shall be submitted to the certifying authority and to the Federal agency concurrently.

The application is being filed with the Federal Energy Regulatory Commission concurrently.

b) A certification request for an individual license or permit shall:

(1) Identify the project proponent(s) and a point of contact;

Great Lakes Hydro America, LLC
Michael Scarzello
Manager, Licensing
Brookfield Renewable U.S.
399 Big Bay Road
Queensbury, NY 12804

(2) Identify the proposed project;

Penobscot Mills Hydroelectric Project (FERC Project No. P-2458)

(3) Identify the applicable federal license or permit;

Application for New License for a Major Water Power Project – Existing Dam,
Penobscot Mills Hydroelectric Project (FERC No. 2458)

(4) Identify the location and nature of any potential discharge that may result from the proposed project and the location of receiving waters;

The discharge would be waters of the West Branch of the Penobscot River and Millinocket Stream.

(5) Include a description of any methods and means proposed to monitor the discharge and the equipment or measures planned to treat, control, or manage the discharge;

GLHA monitors flows and adjusts hydroelectric units, gates, and other conveyances to support operation of the Project for hydroelectric generation and for other applicable designated uses of the receiving waters including fishing, recreation in and on the water, and as habitat for fish and other aquatic life.

(6) Include a list of all other federal, interstate, tribal, state, territorial, or local agency authorizations required for the proposed project, including all approvals or denials already received;

GLHA is seeking a new license from the Federal Energy Regulatory Commission for the Penobscot Mills Project. No other approvals, licenses, permits, or authorizations are required.

(7) Include documentation that a prefiling meeting request was submitted to the certifying authority at least 30 days prior to submitting the certification request;

A copy of the pre-filing meeting request and a summary of the meeting is provided as Attachment 5 to the application.

(8) and (9) Statement

The project proponent hereby certifies that all information contained herein is true, accurate, and complete to the best of my knowledge and belief. The project proponent hereby requests that the certifying authority review and take action on this WQC Application within the applicable reasonable period of time. GLHA respectfully requests that the Department provide a draft of the WQC for review 30 days before issuing the final WQC. If the MDEP requires access and entry to the property and facilities under this certification, GLHA respectfully requests that the Department coordinate accompanied access with GLHA prior to any inspections deemed necessary by the Department to help ensure access as needed and the safety of on-site operating staff and Department staff.

GLHA hereby submits the enclosed WQC Application to the Department for the Penobscot Mills Project, which includes the following:

- o WQC Application Form
- o WQC Application Attachments
 1. Application Supplemental Information
 2. Notice to Municipalities
 3. Notice to Abutters
 4. Newspaper Notice
 5. Prefiling Meeting Record
 6. Certificate of Good Standing
 7. CZMA Determination
 8. Fee Payment Form
 9. Proof of Mailing to Abutters



- o WQC Application Appendices
 - Appendix 1: Penobscot Mills Hydroelectric Project FERC No. 2458 Final License Application (hyperlink provided in Application)
 - Appendix 2 – List of Project Relicensing Documents on FERC Docket for WQC Record

If there are any questions or comments regarding this filing, please feel free to contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "MS", is placed over a light blue rectangular background.

Michael Scarzello
Manager, Licensing

cc: Claire Briggs, MDEP

Enclosure: Penobscot Mills Hydroelectric Project (FERC No. P-2458) Application for Water Quality Certification

GREAT LAKES HYDRO AMERICA, LLC

1024 Central Street, Millinocket, ME 04462

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Land Resource
17 State House Station
Augusta, Maine 04333
Telephone: 207-287-7688

FOR DEP USE

ATS # _____
#L- _____
Fees Paid _____
Date Fees Received _____

**APPLICATION FOR
WATER QUALITY CERTIFICATION
(U.S. P.L. 92-500, SECTION 401)**

HYDROPOWER PROJECT LICENSING/RELICENSING ONLY

This form shall be used to request Water Quality Certification for the proposed FERC licensing or relicensing of an existing hydropower generating or storage project where no construction, reconstruction or structural alteration of project facilities which would affect water levels or flows is proposed.

All required fees must be paid before application processing will begin. Please contact the Department for current fee schedule information. Fees are payable to Treasurer, State of Maine.

APPLICANT INFORMATION

Name of Applicant: Great Lakes Hydro America, LLC

Mailing Address: 1024 Central Street
Millinocket, ME 04462

Name of Contact or Agent: Michael Scarzello, Licensing Manager

Telephone: (315) 566-0197

PROJECT INFORMATION

Name of Project: Penobscot Mills Hydroelectric Project

FERC No. P-2458

Address (use "911" address, if available):

Name of Waterbody Affected: West Branch of the Penobscot River and Millinocket Stream

Municipality of Township: Millinocket

County: Penobscot and Piscataquis

GPS Coordinates, if known:

REQUIRED INFORMATION

1. Provide all the information requested by this application form.
2. If applicant is a registered corporation, provide either a *Certificate of Good Standing* (available from the Secretary of State) or a statement signed by a corporate officer affirming that the corporation is in good standing.
3. A signed Certification of Publication and a completed Notice of Intent to File an application for Water Quality Certification.

NOTE: All supporting documents summarized above must be attached to this form and sent to the DEP Office listed below:

Department of Environmental Protection
Bureau of Land Resources
17 State House Station
Augusta, ME 04333
Tel: (207) 287-7688

"I certify under penalty of law that I have personally examined the information submitted in this document and all attachments thereto and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the information is true, accurate, and complete. I authorize the Department to enter the property that is the subject of this application, at reasonable hours, including buildings, structures or conveyances on the property, to determine the accuracy of any information provided herein. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

DATE: 8/27/2026


SIGNATURE OF APPLICANT

(IF SIGNATURE IS OTHER THAN APPLICANT,
ATTACH LETTER OF AGENT AUTHORIZATION
SIGNED BY APPLICANT)

Nathan Stevens VP operations
PRINTED NAME & TITLE

WATER QUALITY CERTIFICATION APPLICATION

GENERAL INFORMATION

1. By submitting this application, an applicant requests Water Quality Certification pursuant to Section 401 of the Federal Clean Water Act for the continued operation of an existing hydropower generating or storage project under the terms of an initial or a new license from the Federal Energy Regulatory Commission. Certification must be obtained for any activity requiring a federal license or permit which may result in a discharge into the navigable waters of the United States.
2. The purpose of this application form is to obtain from the applicant a thorough description of project facilities and operation and the impacts of the continued operation of the project on water quality.

The Department's Regulations provide that the applicant bears the burden of proof in the application process. This is the burden of presenting sufficient evidence for the Department to make the affirmative findings required by law regarding matters about which no questions are raised and the burden of presenting a preponderance of the evidence regarding matters about which questions are raised.

3. In order to grant certification, the Department must conclude that there is a reasonable assurance that the continued operation of a hydropower generating or storage project will not violate applicable Water Quality Standards. These standards have been established in the State's Water Classification Program (Title 38 MRSA Sections 464-469). These standards designate the uses and related characteristics of those uses for each class of water and establish water quality criteria necessary to protect those uses and related characteristics.
4. Any applicant for a FERC license must complete a three stage consultation process with appropriate state and federal agencies. The purpose of this process is to identify and analyze the potential environmental and socioeconomic impacts of a project.

The consultation process requires an applicant to have either requested or obtained water quality certification at the time of filing with FERC. The process also requires that an applicant serve a copy of its FERC application, including any revisions, supplements or amendments thereto, on each of the agencies consulted.

WATER QUALITY CERTIFICATION APPLICATION

FILING INSTRUCTIONS AND PROCEDURES

When filing, send an original paper copy plus one (1) electronic copy of a completed Application for Water Quality Certification to the Department, along with two (2) copies of the Application for Initial License or New License that has been or will be filed with FERC. The State filing can be made prior to or concurrent with the FERC filing.

The Department is required by law to assess fees for processing applications and for monitoring permit compliance. Application processing will not begin until all required fees have been paid. When filing, submit full fee payment as shown on the [DEP fee schedule](#). Please make checks payable to: Treasurer, State of Maine.

A number of consulting agencies will be involved in the State review process of hydropower projects. Distribution of copies of the FERC application to these agencies may be coordinated by DEP or may be handled directly by the applicant. When filing, please notify the DEP staff to discuss distribution procedures.

Most information requested by this application form can be provided by making reference to the appropriate exhibit of the FERC license application. Space is provided on the form for such references.

Within 15 working days of receiving an application and all required fees, the DEP shall determine whether the application as filed is acceptable for processing.

Additional information may be required during the review process on any aspect of the project relating to compliance with applicable statutory criteria.

WATER QUALITY CERTIFICATION APPLICATION

1. **NATURE OF ACTIVITY.** Check appropriate item:

_____ Application for Initial License.

 X Application for New License (Relicense).

A COPY OF A COMPLETED FERC APPLICATION FOR LICENSE (THIRD STAGE CONSULTATION) MUST ACCOMPANY THIS FORM.

NOTE: A copy of any document revising, supplementing, amending, or correcting deficiencies in the application as originally filed with FERC must also be filed with D.E.P.

2. **EXISTING ENVIRONMENT.** Provide a description of the physical environment of the project site and its immediate vicinity. The project site includes all land and water areas affected by the project.

REFERENCE: FERC EXHIBIT(S) FERC Final License Application, Exhibit E

3. **PROJECT DESCRIPTION.** Provide a detailed description of the existing project. A hydropower project includes all powerhouses, dams, water conduits, transmission lines, water impoundments, roads, and other appurtenant works and structures that are part of the development. This description must include:

- A. The physical composition, dimensions, and general configuration of all project structures;
- B. The normal maximum surface area and elevation, gross storage capacity, and usable storage capacity of any impoundments;
- C. The number, type, and rated capacity of any turbines or generators; and
- D. The number, length, and voltage of any primary transmission lines.

REFERENCE: FERC EXHIBIT(S) FERC Final License Application Exhibit A, B, C, E
Supplemented by the May 6, 2026 Additional Information Request Response

4. **PROJECT OPERATION.** Provide a description of project operation, to include:

- A. The mode of project operation during low, mean, and high water years, including extent and duration of flow release and impoundment fluctuations;
- B. An estimate of the dependable capacity and average annual energy production, in kilowatt hours, of the project;
- C. An estimate of minimum, mean, and maximum flows, in cubic feet per second, at the project site, including a flow duration curve;
- D. An estimate of the maximum and minimum hydraulic capacities, in cubic feet per second, of any powerplant; and
- E. A statement of the manner in which the power generated at the project is utilized.

5. **PROJECT PLANS.** Provide general design drawings showing all major project structures in sufficient detail to provide a full understanding of the project, including:
- A. Plans (overhead view);
 - B. Elevations (front view); and
 - C. Sections (side view).

REFERENCE: FERC EXHIBIT(S) FERC Final License Application, Exhibit F

6. **PROJECT MAPS.** Provide maps of the project showing:
- A. The location of the project, including principal project structures and features, with reference to local geographic features; and
 - B. A project boundary enclosing all principal project structures and features proposed to be licensed.

REFERENCE: FERC EXHIBIT(S) FERC Final License Application, Exhibit G

7. **TITLE, RIGHT OR INTEREST.** The Department's Regulations require that any applicant must possess sufficient title, right or interest in all project lands and waters in order to have standing to seek a permit, license, or certification. Please complete the appropriate item(s) below establishing title, right or interest and attach a copy of the indicated document(s):

- ☐ Deed.
- ☐ Option to buy.
- ☐ Lease.
- ☒ Valid FERC License (including all amendments/modifications).
- ☐ Exercise of flowage rights through operation of the Mill Act (12 MRSA Section 651).
- ☐ Exercise of eminent domain under FERC License.

8. **WATER QUALITY.** Provide a description of the impact of the project on water quality, including:

- A. A description of the applicable water quality standards and stream segment classification for the project impoundment and downstream waters, including a description of designated uses;
- B. A description of existing water quality in the project impoundment and downstream waters affected by the project, including a description of existing in-stream water uses;
- C. A statement of the existing measures to be continued and new measures proposed for the purpose of protecting and improving water quality, including measures for the mitigation of project impacts on the designated uses of project waters; and
- D. A description of any anticipated continuing impact on water quality from the continued operation of the project, including impacts on the designated uses of project waters.

FERC Final License Application, Exhibit E; Supplemented by the May 29, 2025, July 28, 2025, and May 6, 2026 Additional Information Request Responses. Attachment 1- Supplemental Information

PUBLIC NOTICE FILING AND CERTIFICATION

Department Rules, Chapter 2, require an applicant to provide public notice for Water Quality Certification projects within 30 days prior to filing the application. In the notice, the applicant must provide the information included in the attached Notice of Intent to File form. "Abutter" for the purposes of the notice provision means any person who owns property that is contiguous with the property on which the project requiring a license from the Department is proposed.

1. **Newspaper:** You must publish the Notice of Intent to File in a newspaper circulated in the area where the activity is located. The notice must appear in the newspaper within 30 days prior to the filing of the application with the Department. You may use the attached Notice of Intent to File form, or one containing identical information, for newspaper publication.
2. **Abutters and Others Owning Land Within 1,000 Feet:** You must mail a copy of the Notice of Intent to File to abutters and all persons owning land within 1,000 feet of the proposed project. Their names and addresses can be obtained from the town tax maps or local officials. They must receive notice within 30 days prior to the filing of the application with the Department.
3. **Municipal Office or County Commissioner(s):** You must mail a copy of the Notice of Intent to File and a duplicate of the entire application to the Municipal Office or, if the proposed project is located in an unorganized or deorganized area of the State, to the county commissioner(s). The Municipal Office or county commissioner(s) must receive notice within 30 days prior to the filing of the application with the Department.

ATTACH a copy of the published notice and a list of persons to whom notice was provided.

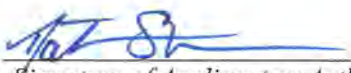
CERTIFICATION

By signing below, the applicant or authorized agent certifies that:

1. A Notice of Intent to File was published in a newspaper circulated in the area where the project site is located within 30 days prior to filing the application;
2. A mailing of the Notice of Intent to File was sent to all abutters and all other persons owning land within 1,000 feet of the proposed project within 30 days prior to filing of the application;
3. A mailing of the Notice of Intent to File, and a duplicate copy of the application was sent to the town office of the municipality in which the project is located or, if applicable, to the county commissioner(s); and
4. Provided notice of and held a public informational meeting, if required, in accordance with the Department's Chapter 2 rules, Processing of Applications and Other Administrative Matters, Section 12, prior to filing the application. Notice of the meeting was sent to abutters and all other persons owning land within 1,000 feet of the proposed project and to the town office of the municipality in which the project is located or to the county commissioner(s), as applicable, at least at least ten days prior to the meeting. Notice of the meeting was also published once in a newspaper circulated in the area where the project site is located at least seven days prior to the meeting.

The Public Informational Meeting was held on N/A
(Date)

Approximately _____ members of the public attended the Public Informational Meeting.



Signature of Applicant or Authorized Agent

8/27/2026

Date

**Ripogenus Hydroelectric Project (FERC No. P-2572) and
Penobscot Mills Hydroelectric Project (FERC No. P-2458)**

ATTACHMENT 1

Supplemental Information for the Application for Water Quality Certification

8. WATER QUALITY. Provide a description of the impact of the project on water quality, including:

A. A description of the applicable water quality standards and stream segment classification for the project impoundment and downstream waters, including a description of designated uses.

The State of Maine's water classification system and water quality standards for surface waters are provided in 38 MRS 464-468. The State has four standards for classification of fresh surface waters (AA, A, B, and C) and one classification for Great Ponds (GPA). The classifications establish designated uses and the standards necessary to protect those uses. The water quality classification designated uses and numeric and narrative standards for each classification of waters in the State of Maine are provided in Table 1-1 below.

Classification – Ripogenus Project

The Ripogenus impoundment (comprised of six basins, including Chesuncook Lake) is classified as GPA, as modified by 38 MRS 464-9(A). Applicable numeric and narrative standards are provided in Table 1-1. Applicable aquatic life standards for the Ripogenus impoundment are defined by MRS 464-9(A) which states that the Ripogenus impoundment “is deemed to have met the habitat characteristics and aquatic life criteria in the existing impoundment if; (1) the project is in existence on June 30, 1992; (2) the project creates an impoundment that remains classified under Section 465-A after June 30, 1992; (3) the project creates an impoundment that is subject to water level fluctuations that have an effect on the habitat and aquatic life in the littoral zone so that the habitat and aquatic life differ significantly from that found in an unimpounded great pond; and (4) the existing impounded waters are able to support all species of fish indigenous to those waters and the structure and function of the resident biological community in the impounded waters is maintained”.

The West Branch of the Penobscot River is classified as Class B waters from Ripogenus Dam to McKay Station. Applicable numeric standards and narrative standards for Class B waters are provided in Table 1-1, below. Aquatic life standards for Class B waters state that “discharges shall not cause adverse impact to aquatic life in that the receiving waters shall be of sufficient quality to support all aquatic species indigenous to the receiving water without detrimental changes to the resident biological community.

The West Branch of the Penobscot River is classified as Class A from McKay Station to 1,000 feet downstream. The West Branch of the Penobscot River is classified as Class AA from 1,000 feet downstream of McKay Station to its confluence with Ambajejus Lake, which is outside the FERC Project boundary. Applicable numeric standards and narrative standards for Class AA waters are the same as those for Class A waters and are provided in Table 1-1 below. Aquatic life standards for Class A waters state that the habitat be “as naturally occurs” and that the “habitat must be characterized as free-flowing and natural”.

Classification – Penobscot Mills Project

Two of the Penobscot Mills Project impoundments, North Twin impoundment and Millinocket Lake Storage impoundment, are classified as GPA. Designated uses and numeric and narrative standards for Class GPA waters are provided in Table 1-1 below.

The Millinocket development impoundment (Quakish Lake and Ferguson Pond), the Dolby impoundment, and the East Millinocket impoundment are classified as riverine in accordance with MRS 464 (13)(B). The classifications of each riverine impoundment and stream segment are as follows:

- West Branch including the Millinocket impoundment from the outlet of Elbow Lake at the North Twin Dam to the outlet of Quakish Lake and Ferguson Pond is classified as Class B.
- West Branch from the outlet of Quakish Lake and Ferguson Pond to its confluence with Millinocket Stream (includes the West Branch downstream of Stone Dam) is classified as Class C.
- West Branch including Dolby impoundment and East Millinocket impoundment, from the confluence with Millinocket Stream to its confluence with the East Branch of the Penobscot River, (including all impoundments), is classified as Class B.

- Millinocket Stream from Millinocket Lake Storage Dam to the railroad bridge near the Millinocket-T3 Indian Purchase boundary is classified as Class A.
- Millinocket Stream from the railroad bridge near the Millinocket-T3 Indian Purchase boundary to its confluence with the West Branch Canal is classified as Class B.
- Millinocket Stream from the confluence of the West Branch Canal to its confluence with the West Branch of the Penobscot River is classified as Class B.

Table 1-1: Applicable designated uses and water quality standards for the waters of the Ripogenus and Penobscot Mills Projects

Class	Designated Uses	Standards
GPA	Drinking water after disinfection, fishing, agriculture, recreation in and on the water, industrial process and cooling water supply, hydroelectric power generation, navigation, habitat for fish and other aquatic life. The habitat must be characterized as natural.	No numeric DO standard. Shall be described by their trophic state based on measures of the chlorophyll-a content, Secchi disk transparency, total phosphorus, and other appropriate criteria. Shall have a stable or decreasing trophic state, subject only to natural fluctuations. Shall be free of culturally induced algal blooms, which impair their use and enjoyment. Aquatic life criteria: as naturally occurs.
C	Drinking water supply after treatment, fishing, agriculture, recreation in and on the water, industrial process and cooling water supply, hydroelectric power generation, navigation, habitat for fish and other aquatic life.	DO > 5 mg/L or 60% saturation, whichever is higher. Impoundments - Total phosphorus: spatial geometric mean $\leq 44 \mu\text{g/L}$; Chlorophyll-a: spatial geometric mean $\leq 8.0 \mu\text{g/L}$ (no value > $10 \mu\text{g/L}$); Secchi Disk Transparency: $\geq 2 \text{ m}$ pH: 6.5-9.0 (discharges only) Aquatic life criteria: Discharges may cause some changes to aquatic life, provided that receiving waters shall be of sufficient quality to support all species of fish indigenous to the receiving waters and maintain the structure and function of the resident biological community.

Class	Designated Uses	Standards
B	Drinking water supply after treatment, fishing, agriculture, recreation in and on the water, industrial process and cooling water supply, hydroelectric power generation, navigation, habitat for fish and other aquatic life. The habitat must be characterized as unimpaired.	DO > 7 mg/L or 75% saturation, whichever is higher; From October 1 to May 14, 7-day mean DO > 9.5 mg/L and 1-day minimum > 8 mg/L in identified fish spawning areas. Impoundments - Total phosphorus: spatial geometric mean $\leq 30 \mu\text{g/L}$; Chlorophyll-a: spatial geometric mean $\leq 8.0 \mu\text{g/L}$ (no value > $10 \mu\text{g/L}$); Secchi Disk Transparency: $\geq 2 \text{ m}$ pH: 6.5-9.0 (discharges only) Aquatic life criteria: Discharge shall not cause adverse impact to aquatic life in that the receiving waters shall be of sufficient quality to support all aquatic species indigenous to the receiving water without detrimental changes to the resident biological community.
A	Drinking water after disinfection, fishing, agriculture, recreation in and on the water, industrial process and cooling water supply, hydroelectric power generation, navigation, habitat for fish and other aquatic life. The habitat must be characterized as natural.	DO > 7 mg/L or 75% saturation, whichever is higher; From October 1 to May 14, 7-day mean DO > 9.5 mg/L and 1-day minimum > 8 mg/L in identified fish spawning areas. Impoundments - Total phosphorus: spatial geometric mean $\leq 19 \mu\text{g/L}$; Chlorophyll-a: spatial geometric mean $\leq 6.0 \mu\text{g/L}$ (no value > $8 \mu\text{g/L}$); Secchi Disk Transparency: $\geq 2 \text{ m}$ pH: 6.5-9.0 (discharges only) Aquatic life criteria: Direct discharges are allowed but highly restricted; as naturally occur.
AA	Drinking water after disinfection, fishing, agriculture, recreation in and on the water, navigation, habitat for fish and other aquatic life.	DO: as naturally occurs. Impoundments - Total phosphorus: spatial geometric mean $\leq 19 \mu\text{g/L}$; Chlorophyll-a: spatial geometric mean $\leq 6.0 \mu\text{g/L}$ (no value > $8 \mu\text{g/L}$); Secchi Disk Transparency: $\geq 2 \text{ m}$ pH: 6.5-9.0 (discharges only) Aquatic life criteria: As naturally occurs. Habitat must be characterized as free-flowing and natural.

Sources: MRS 2021c; MDEP 2020, 2021a [as referenced in FLA, Exhibit E, Section 10.0 Literature Cited]; MDEP. 2025. Chapter 583 Nutrient Criteria for Class AA, A, B, and C Fresh Surface Waters.

B. A description of existing water quality in the project impoundment and downstream waters affected by the project, including a description of existing instream water uses.

Water Quality Studies

GLHA has demonstrated existing water quality in each of the impoundments and riverine sections affected by the Projects or their operations through the conduct of a number of water quality studies that were requested by the Maine Department of Environmental Protection (Department) and conducted by GLHA as part of the FERC relicensing process. All of the studies were conducted in conformance with the Department rules, protocols, and policies and following methods prescribed therein, as summarized below.

Department Rules

1) 06-096 C.M.R. Chapter 579: Classification Attainment Evaluation Using Biological Criteria for Rivers and Streams. Criteria to quantify aquatic life standards for Classes AA, A, B, and C waters are defined in this chapter. The benthic macroinvertebrate community is used as a surrogate to determine conformance with statutory aquatic life standards, related statutory definitions, and statutory provisions for the implementation of biological water quality criteria that are provided in Maine's standards for classification of fresh surface waters. Methods described in this chapter are used to make decisions about classification attainment. All of the macroinvertebrate sampling conducted in the impoundment and stream reaches that are part of the Ripogenus and Penobscot Mills Projects were conducted in accordance with this rule.

2) 06-096 C.M.R. Chapter 580: Regulations Relating to Sampling Procedures and Analytical Procedures. This rule establishes standards whereby all sampling and analysis are performed according to accepted technical procedures for chemical and biological analysis. All water quality sampling and analysis conducted at the Ripogenus and Penobscot Mills Projects were done in accordance with this rule.

3) 06-096 C.M.R. Chapter 581: Regulations Relating to Water Quality Evaluations. This rule provides for the maintenance of water classifications by computing the assimilative

capacity of the waters to break down waste and provides for the maintenance of zones of passage for free-swimming and drifting organisms. As there are no wastewater discharges to Ripogenus or Penobscot Mills Projects waters, there are no concerns regarding assimilative capacity. Regarding zone of passage, the Applicant's water quality studies demonstrate that an adequate zone of passage is maintained under the proposed operating conditions in the West Branch and Millinocket Stream in the Projects waters.

Department Policies

A. Aquatic Habitat and Aquatic Life 38 M.R.S. § 465(4)(A); § 465(4)(C); 38 M.R.S. § 464(10)(C)). Under these regulations, an Applicant must demonstrate that the Project impoundments and stream segments downstream of the Project dams are suitable for the designated use of habitat for fish and other aquatic life. Conformance with the aquatic habitat designated use is determined by methods described in the Department's *Hydropower Project Flow and Water Level Policy*, dated February 4, 2002 (Water Level Policy). Under this policy guidance, the Department operates under the rebuttable presumption that a flow that provides wetted conditions in a weighted average of 3/4ths of the cross-sectional area of the affected river or stream, as measured from bankfull conditions, or a water level that provides wetted conditions for 3/4ths of the littoral zone of a lake or pond, as measured from full pond conditions, meets aquatic life and habitat standards. On a case-by-case basis, the Department may approve alternative flows or water levels under circumstances defined in the Water Level Policy, where the alternative flows or water levels can be shown to meet all applicable water quality standards. As requested by the Department, the Applicant evaluated the ¾ littoral zone, and ¾ wetted width conditions provided by the Projects under proposed operations, consistent with the Department's Water Level Policy.

38 M.R.S. § 465(4)(A) also requires that the West Branch of the Penobscot River is of sufficient quality to support all species of fish indigenous to the receiving waters and to maintain the structure and function of the resident biological community in accordance with the applicable Class B and Class A narrative and numeric aquatic life standards. As outlined above, accepted biomonitoring techniques with respect to rivers and streams are established in Department rule, 06-096 C.M.R. ch. 579, *Classification Attainment Evaluation Using Biological Criteria for Rivers and Streams* (effective May 27, 2003) (Chapter 579). Criteria to quantify aquatic life standards for Class AA, A, B, and C waters use the benthic macroinvertebrate community as a surrogate to determine classification attainment. Chapter 579 addresses how benthic macroinvertebrate samples must be collected and the process for analyzing these samples using the linear discriminant model

(LDM) to evaluate whether the sampled river or stream is in attainment. The selection of sampling sites, as well as data collection and processing, must be in conformance with the Department's Methods for Biological Sampling and Analysis of Maine's Rivers and Streams. Ch. 579, § 3(A). As noted previously, all macroinvertebrate sampling conducted at the Ripogenus and Penobscot Mills Projects was done in accordance with these methods.

Existing Water Quality

The results of the water quality studies conducted by GLHA are provided in the Water Quality Study Reports provided primarily in the FERC relicensing Initial Study Report and Updated Study Report filed with FERC on April 24, 2023 and April 22, 2024, respectively and as summarized in Exhibit E of the FLA (filed with FERC on September 30, 2024). Water quality data sets were also submitted to the Department separately, as requested. The following documents, reports, and data represent the total of GLHA's submissions of water quality data and study results, to date.

- 1) Ripogenus and Penobscot Mills Projects Water Quality Study - Initial Study Report, FERC Accession # 20230424-5265, April 24, 2023
- 2) Ripogenus and Penobscot Mills Project Water Quality Study - Updated Study Report, FERC Accession # 20240422-5168, April 22, 2024
- 3) Ripogenus and Penobscot Mills Projects -2022 Riverine Macroinvertebrate Data; Email from Normandeau Associates (D. Trested) to MDEP (K. Olcott), February 22, 2023
- 4) Ripogenus Project - 2023 Ripogenus Impoundment Macroinvertebrate Data – Email from Normandeau Associates (D. Trested) to MDEP (K. Olcott), June 29, 2023
- 5) Penobscot Mills Project - 2024 North Twin Impoundment Macroinvertebrate Data - Email from Normandeau Associates (D. Trested) to MDEP (L. Paye), September 11, 2024
- 6) Penobscot Mills Project – 2023 West Branch Downstream of Stone Dam Riverine Macroinvertebrate Resample – Email from Kleinschmidt Associates (J. Wechsler) to MDEP (L. Paye), April 11, 2024
- 7) Ripogenus and Penobscot Mills Projects – 2024 Resample of Riverine Macroinvertebrates at 6 Sample Sites – Email from Moody Mountain (P. Leeper) to MDEP (J. DiFranco) - May 29, 2025 and filed with FERC by GLHA on May 29, 2025.

Details regarding the study results are provided in each of the study reports or data submittals. Table 1-2 and Table 1-3 summarize the results with respect to the classification and applicable water quality standards for each of the impoundments and riverine sections of the Ripogenus and Penobscot Mills Projects.

Table 1-2. Ripogenus Project summary of water quality, aquatic habitat, and aquatic life study results – Existing Conditions

Project Waters	Classification	Applicable Criteria	Description/Methods	Summary of Study Results
Ripogenus Impoundment	GPA, as modified by 38 MRS §464-9(A)	Water Quality: trophic state	Sampling conducted June 7-October 18, 2022 at 6 locations (6 subbasins)	• Sampling per MDEP protocols completed in 2022 (see ISR, Appendix C) • Waters well oxygenated • Thermally stratified in mid-summer • No evidence of algal blooms based on trophic state indicators • Characterized as oligotrophic/ mesotrophic • Trophic state parameters meet Class GPA (ISR, Appendix C)
	GPA, as modified by 38 MRS §464-9(A)	Aquatic Habitat/ Life: Littoral zone assessment and demonstration of “structure and function of aquatic community” and support of indigenous fish species	Fish assemblage and benthic macroinvertebrate sampling in 2022	• Fish sampling in 2022 demonstrated that an assemblage of indigenous coldwater fish species is supported. (see ISR, Appendix D and FLA, Exhibit E, Appendix E.7) • Diverse macroinvertebrate community containing sensitive, stress-intolerant species as well as more stress-tolerant species reflecting a balanced distribution of species. • MDEP wetland linear discriminant model (LDM) found 2022 benthic macroinvertebrate (BMI) were indicative that the structure and function of the resident aquatic community is maintained and meet the applicable aquatic life standard (ISR, Appendix C, USR Appendix C)
West Branch below Ripogenus Dam (Upper Gorge)	B	Water Quality: DO/temp	Continuous DO/water temperature monitoring in 1 location	• Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) • DO concentration and percent saturation meet Class B standards (ISR, Appendix C)
	B	Aquatic Habitat: ¾ wetted width or x-sectional area or to maintain “zone of passage (ZOP)”	Transect based zone of passage assessment	• Transect data (depth) collected in 2022 demonstrates ZOP at leakage (~12 to 25 cfs) and 100 cfs (ISR, Appendix C) • Results demonstrate that the existing minimum flow releases (leakage and 100 cfs) maintain aquatic habitat, wetted channel conditions, and adequate zone of passage for resident and indigenous fish species (ISR, Appendix C)

Project Waters	Classification	Applicable Criteria	Description/Methods	Summary of Study Results
	B	Aquatic Life: sufficient quality to support all aquatic species indigenous to the receiving water	Standard MDEP bug-basket sampling	- BMI sampling completed in 2022 (ISR, Appendix C) - MDEP macroinvertebrate LDM found 2022 BMI results are representative of Class A waters and meet applicable aquatic life standards (USR, Appendix C)
West Branch within 1,000 ft below McKay Station	A	Water Quality: DO/temp	Continuous DO/water temperature monitoring in 1 location	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - DO concentration and percent saturation meet Class A standards (ISR, Appendix C)
	A	Aquatic Habitat: $\frac{3}{4}$ wetted width or x-sectional area or to maintain "zone of passage"	Drone-based (video) zone of passage assessment	- Drone video documentation of wetted width and ZOP conducted in 2022 at 1,000 cfs (ISR, Appendix C). - Existing minimum flow of 1,000 cfs maintains aquatic habitat, wetted channel conditions, and adequate ZOP for resident fish species (ISR, Appendix C)
	A	Aquatic Life: as naturally occurs	Standard MDEP bug-basket sampling	- BMI sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - BMI results from 2022 meet Class C standards per MDEP model (USR, Appendix C) - Site resampled in 2024 because 2022 samples taken during anomalous conditions or in atypical habitat - MDEP LDM found BMI results from 2024 meet Class A standards (MDEP 2026; Biological Monitoring Program Site Map, https://experience.arcgis.com/experience/e1f95de7c72244c48f8a131f89a07b5e)

Project Waters	Classification	Applicable Criteria	Description/Methods	Summary of Study Results
West Branch more than 1,000 ft below McKay Station at 2 sites: near Holbrook Side Channel and Little A Falls	AA	Aquatic Life: as naturally occurs (same as the Class A standard)	Standard MDEP bug-basket sampling	- BMI sampling per MDEP protocols completed in 2022 near Holbrook Side Channel (ISR, Appendix C) - MDEP model found BMI results from 2022 meet Class A standards near Holbrook Side Channel (USR, Appendix C) - BMI results from 2022 near Little A Falls were found to meet Class C standards per MDEP LDM - Site near Little A Falls resampled in 2024 because 2022 samples taken during anomalous conditions or in atypical habitat - MDEP model found BMI results from 2024 meet Class A standards (MDEP 2026, Biological Monitoring Program Site Map)

Table 1-3. Penobscot Mills Project summary of water quality, aquatic habitat, and aquatic life study results – Existing Conditions

Project Waters	Classification	Applicable Criteria	Description	Summary of Study Results
Millinocket Lake Storage Impoundment	GPA	Water Quality: trophic state	Sampling conducted June 8-October 19, 2022 at 1 location	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - Waters well oxygenated - Thermally stratified in mid-summer - No evidence of algal blooms based on trophic state indicators - Characterized as mesotrophic - Trophic state parameters meet Class GPA (ISR, Appendix C)
	GPA	Aquatic Habitat: Littoral zone assessment (MDEP 2022)	Desktop analysis: evaluate whether 75% littoral zone volume maintained	- Littoral zone calculations made per MDEP protocols based on available bathymetry data in 2022. (ISR, Appendix K) - At the 11-year average minimum elevation (2011-2021), approximately 74% of the littoral zone surface area and 83% of the littoral zone volume is maintained and meets 75% littoral zone criteria. (ISR, Appendix C)
Millinocket Stream below	A	Water Quality: DO/temp	Continuous DO/water temperature	Sampling per MDEP protocols completed in 2022 (ISR, Appendix C)

Project Waters	Classification	Applicable Criteria	Description	Summary of Study Results
Millinocket Lake Storage Dam			monitoring in 1 location	DO concentration and percent saturation meet Class A standards (ISR, Appendix C)
	A	Aquatic Habitat: $\frac{3}{4}$ wetted width or x-sectional area or to maintain "zone of passage"	Transect-based wetted width and zone of passage assessment	- Transect data (depth) collected in 2022 demonstrates greater than 75% of wetted width is provided at existing minimum flow of 60 cfs. At the existing minimum flow of 60 cfs, the wetted width of the stream channel is 90-91% of the bank full width and provides suitable zone of passage conditions and meets Class A aquatic life standards (ISR, Appendix C). - Video documentation of wetted width and zone-of-passage conditions conducted in 2022 at 60 cfs (ISR, Appendix C)
	A	Aquatic Life: as naturally occurs	Standard MDEP bug-basket sampling	- BMI sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - BMI results from 2022 meet Class C standards per MDEP model (ISR, Appendix C). - Site resampled in 2024 because 2022 samples taken during anomalous conditions or in atypical habitat - MDEP model found BMI results from 2024 were Class C (MDEP 2026, Biological Monitoring Program Site Map)
North Twin Impoundment	GPA	Water Quality: trophic state	Sampling conducted June 8-October 19, 2022 at 3 locations (3 subbasins)	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - Waters well oxygenated - Thermally stratified in mid-summer - No evidence of algal blooms based on trophic state indicators - Characterized as oligotrophic - Trophic state parameters meet Class GPA (ISR, Appendix C)
	GPA	Aquatic Habitat: Littoral Zon assessment	Desktop analysis: evaluate whether 75% littoral zone volume maintained	- Littoral zone calculations made per MDEP protocols based on available bathymetry data in 2022 (ISR, Appendix K) - At the 11-year average minimum elevation of 482.26 ft (2011-2021), 58% of the littoral zone surface area and 60% of the littoral zone volume is maintained (ISR, Appendix C)

Project Waters	Classification	Applicable Criteria	Description	Summary of Study Results
	GPA	Aquatic Life: Littoral demonstration of "structure and function of aquatic community" and support of indigenous fish species	Benthic macroinvertebrate sampling in 2023	2023 data provided to MDEP for analysis with the LDM - MDEP LDM found the structure and function of the resident aquatic community is maintained (best professional judgement) – meets aquatic life standards for Class GPA (MDEP email to GLHA dated January 31, 2025)
West Branch below North Twin Dam	B	Water Quality: DO/temp	Continuous DO/water temperature monitoring in 1 location	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - DO concentration and percent saturation meet Class B standards (ISR, Appendix C)
	B	Aquatic Life: sufficient quality to support all aquatic species indigenous to the receiving water	Standard MDEP bug-basket sampling	- BMI sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - Site resampled in 2024 because 2022 samples taken during anomalous conditions or in atypical habitat - MDEP LDM found BMI results from 2024 meet Class B standards (best professional judgement) (MDEP 2026, Biological Monitoring Program Site Map).
Millinocket Impoundment (Quakish Lake)	B	Water Quality: trophic state	Sampling conducted June 9-October 20, 2022 at 1 location	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - No evidence of algal blooms based on trophic state indicators - Characterized as oligotrophic/mesotrophic - DO meets Class B standard (ISR, Appendix C)
Millinocket Impoundment (Ferguson Pond)	B	Water Quality: trophic state	Sampling conducted June 9-October 20, 2022 at 1 location	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - No evidence of algal blooms based on trophic state indicators - Characterized as mesotrophic - DO meets Class B standard (ISR, Appendix C)

Project Waters	Classification	Applicable Criteria	Description	Summary of Study Results
Millinocket Impoundment and Millinocket Stream below Millinocket powerhouse	B	Aquatic Habitat: demonstrate run-of-river operations	3 years of operations data (impoundment elevation and total station flow)	• Impoundment elevation maintained within ± 1 foot of the normal elevation and run-of-river operations are maintained • Per MDEP protocol for ROR impoundments, meets littoral zone standard (ISR, Appendix C)
Millinocket Stream below Millinocket powerhouse	B	Water Quality: DO/temp	Continuous DO/water temperature monitoring at 1 location	• Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) • DO concentration and percent saturation meet Class B standards (ISR, Appendix C)
	B	Aquatic Life: sufficient quality to support all aquatic species indigenous to the receiving water	Standard MDEP bug-basket sampling	• BMI sampling per MDEP protocols completed in 2022 (ISR, Appendix C) • BMI results from 2022 meet Class C standards per MDEP LDM (ISR, Appendix C) • Resampled in 2024 because 2022 samples taken during anomalous conditions or in atypical habitat • MDEP LDM found BMI results from 2024 meet Class B standards (MDEP 2026, Biological Monitoring Program Site Map)
West Branch below Stone Dam	C	Water Quality: DO/temp	Continuous DO/water temperature monitoring at 2 locations	• DO concentration and percent saturation meet Class C standards (ISR, Appendix C)
	C	Aquatic Habitat: $\frac{3}{4}$ wetted width or x-sectional area or to maintain "zone of passage"	IFIM-PHABSIM hydraulic model assessment of wetted width and zone of passage	• Transect data (depth) collected as part of IFIM study demonstrates ZOP at 50 cfs (ISR, Appendix C) • Leakage flow below Stone Dam has been measured to range from 17 to 189 cfs. Suitable zone of passage conditions maintained when leakage is ≥ 50 cfs.

Project Waters	Classification	Applicable Criteria	Description	Summary of Study Results
	C	Aquatic Life: structure and function of the resident biological community.	Standard MDEP bug-basket sampling	- BMI sampling per MDEP protocols completed in 2022 at river left site (side channel, ISR, Appendix C) - River left site did not meet MDEP LDM requirements for total number of organisms in 2022 - Resampled river left site (side channel) and river right site (main channel) in 2023 - River left site did not meet MDEP LDM requirements for total number of organisms in 2023. - MDEP model found BMI results from 2023 meet Class A standards for river right site (main channel) (MDEP 2026, Biological Monitoring Program Site Map)
Dolby Impoundment	B	Water Quality: trophic state	Sampling conducted June 14-October 20, 2022 at 2 locations	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - No evidence of algal blooms based on trophic state indicators - Characterized as mesotrophic - DO meets Class B standard (ISR, Appendix C)
Dolby impoundment and West Branch	B	Aquatic Habitat: demonstrate run-of-river operations	3 years of operations data (impoundment elevation and total station flow)	- Impoundment elevation maintained within ± 1 foot of the normal elevation and run-of-river operations are maintained - Per MDEP protocol for ROR impoundments, meets littoral zone standard
West Branch below Dolby Dam	B	Water Quality: DO/temp	Continuous DO/water temperature monitoring in 1 location	- Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - DO concentration and percent saturation meet Class B standards (ISR, Appendix C)
	B	Aquatic Life: sufficient quality to support all aquatic species indigenous to the receiving water	Standard MDEP bug-basket sampling	- BMI sampling per MDEP protocols completed in 2022 (ISR, Appendix C) - BMI results from 2022 meet Class C standards per MDEP LDM - Site resampled in 2024 because 2022 samples taken during anomalous conditions or in atypical habitat - MDEP model found BMI results from 2024 meet Class B standards (best professional judgement) (MDEP 2026, Biological Monitoring Program Site Map)

Project Waters	Classification	Applicable Criteria	Description	Summary of Study Results
East Millinocket Impoundment	B	Water Quality: trophic state	Sampling conducted June 9-October 20, 2022 at 1 location	• Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) • No evidence of algal blooms based on trophic state indicators • Characterized as mesotrophic • DO meets Class B standard (ISR, Appendix C)
East Millinocket Impoundment and West Branch	B	Aquatic Habitat: demonstrate run-of-river operations	3 years of operations data (impoundment elevation and total station flow)	• Impoundment elevation maintained within ± 1 foot of the normal elevation and run-of-river operations are maintained • Per MDEP protocol for ROR impoundments, meets littoral zone standard
West Branch below East Millinocket Dam	B	Water Quality: DO/temp	Continuous DO/water temperature monitoring at 1 location	• Sampling per MDEP protocols completed in 2022 (ISR, Appendix C) • DO concentration and percent saturation meet Class B standards (ISR, Appendix C)
	B	Aquatic Life: sufficient quality to support all aquatic species indigenous to the receiving water	Standard MDEP bug-basket sampling	• BMI sampling per MDEP protocols completed in 2022 (see ISR, Appendix C) • BMI results from 2022 meet Class B standards per MDEP model (ISR, Appendix C)

C. A statement of the existing measures to be continued and new measures proposed for the purpose of protecting and improving water quality, including measures for the mitigation of project impacts on the designated uses of project waters

GLHA's proposals for the continued operation of the Ripogenus and Penobscot Mills Projects are included in the FLA (Exhibit E) and as updated in a revised flow proposal for the Ripogenus Project that GLHA filed with FERC on July 14, 2026 (FERC Accession #20260714-5185). Tables 1-4 and 1-5 summarize the existing measures to be continued and new measures proposed that will protect, mitigate, and enhance Project water quality; ensure that Project discharges will meet all applicable water quality standards; and protect all designated uses.

Table 1-4 Ripogenus Project Proposed Operations and PM&E Measures – Effects on Water Quality

Type	Ripogenus Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Operations – Impoundment Elevation	Continue to operate the Ripogenus Project for generation and seasonal storage and maintain Ripogenus impoundment elevations pursuant to the existing system-wide rule curve for the West Branch system.	GLHA's trophic state and aquatic life water quality studies (ISR) demonstrated that under current operations, the Ripogenus impoundment meets all applicable water quality standards and designated uses. GLHA's proposal to continue to operate the Ripogenus impoundment, as proposed, will allow the Ripogenus impoundment to continue to meet applicable trophic state and aquatic life standards, and will protect all designated uses.
Operations – Minimum Bypass Flow	Continue to provide a minimum flow of 100 cfs from July 1 through September 30 downstream of Ripogenus Dam into the West Branch to enhance seasonal landlocked salmon fishing; leakage flow for the remainder of the year.	GLHA's water quality and aquatic life evaluations of the West Branch downstream of Ripogenus Dam to McKay Station demonstrate that under the existing minimum flow conditions (seasonally leakage or 100 cfs), DO and temperature conditions meet Class B standards. Aquatic life standards for Class B waters are met through the provision of a zone of passage sufficient to support aquatic species indigenous to the reach (ISR; Exhibit E, Section 6.6).
Operations – Minimum Flow	Provide a year-round minimum flow of 1,700 cfs (not including the minimum flow from Ripogenus Dam) into the West Branch downstream of McKay Station except during low inflow periods based on consultation with resource agencies or pursuant to a low inflow protocol to be developed.	GLHA's water quality evaluations of the West Branch downstream of McKay Station demonstrate that under the existing minimum flow conditions (seasonally 1,000-1,420 cfs) both DO and temperature conditions meet Class A standards. GLHA's benthic macroinvertebrate evaluations of the West Branch downstream of McKay Station demonstrate that aquatic community is as naturally occurs and under current operations meets Class A standards. GLHA's proposal to increase the minimum flow from McKay Station to 1,700 cfs year-round will significantly enhance the aquatic community in the West Branch downstream of McKay Station, and will continue to meet all applicable water quality and aquatic life standards, as well as protect all designated uses.
Operations – Station Outage Flow	Continue to provide a minimum hourly average flow of 400 cfs from McKay Station within 15 minutes of the unplanned outage and if safe (e.g., based on safe travel conditions to the Project), reestablish the required minimum flow (i.e., resumed operation of the turbines or via a release from Ripogenus dam) within 24 hours following the initial outage.	GLHA's water quality evaluations of the West Branch downstream of McKay Station demonstrate that under the existing procedures for providing a minimum hourly average flow of 400 cfs from McKay Station within 15 minutes of an unplanned outage and to reestablish the required minimum flow within 24 hours of the initial outage, there are some observable fish and macroinvertebrate stranding effects. However, GLHA's benthic macroinvertebrate surveys of the West Branch downstream of McKay Station in three separate locations

Type	Ripogenus Project - Proposed PM&E Measure		Effects on Water Quality and Designated Uses
			demonstrate that the aquatic community is as naturally occurs and under current operations meets Class A aquatic life standards. GLHA's proposal to increase the minimum flow from McKay Station to 1,700 cfs, year-round, will significantly enhance the aquatic community in the West Branch downstream of McKay Station, and will continue to meet all applicable water quality and aquatic life standards, as well as protect all designated uses.
Operations – Recreation Flow	Provide target boating flows downstream of McKay Station in accordance with the following schedule, subject to water availability (note: the proposed schedule below was provided in GLHA's Final License Application Update filed with FERC July 14, 2026):		GLHA's existing boating flow schedule provides world-class whitewater boating flows in the West Branch downstream of McKay Station for both commercial outfitters and private boaters to use and enjoy. The whitewater boating flow schedule proposed by GLHA in the July 2026 FLA Update was initially proposed by the Maine Professional Rafting Outfitters (MEPRO). It is similar to the original boating flow proposal GLHA included in the FLA, but includes some adjustments that MEPRO suggests will still fully support the whitewater boating and rafting industry while possibly conserving water in the Ripogenus impoundment. As such, GLHA's proposed boating flow schedule will help to ensure that both the Ripogenus impoundment and the West Branch downstream of McKay Station continue to fully meet water quality and aquatic life standards, as well as the designated uses of recreation in and on the water, navigation, and hydroelectric generation.
	Date Range & Time of Day	Minimum Boating Flows	
	May 1 through Friday prior to Memorial Day Weekend (8:30 AM – 3:00 PM)	Normal and wet hydrologic periods: • 2,300 cfs (Sat, Sun) • 2,200 cfs (Mon, Fri) • 2,000 cfs (Tue, Wed, Thu) Dry hydrologic periods: • 1,700 cfs (daily)	
	Saturday of Memorial Day Weekend through Sunday of Labor Day Weekend (8:30 AM – 3:00 PM)	Normal and wet hydrologic periods: • 2,300 cfs (Sat, Sun) • 2,200 cfs (Mon, Fri) • 2,000 cfs (Tue, Wed, Thu) Dry hydrologic periods: • 2,200 cfs (Sat, Sun) • 2,000 cfs (Mon, Fri) • 1,800 cfs (Tue, Wed, Thu)	
	Labor Day through October 1 (8:30 AM – 3:00 PM)	Normal and wet hydrologic periods: • 2,300 cfs (Sat, Sun) Dry hydrologic periods: • 2,200 cfs (Sat, Sun)	

Type	Ripogenus Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Operations – Fisheries Habitat	Continue to operate and maintain the Holbrook Side Channel as habitat for landlocked salmon and brook trout per the following measures. - Maintain flow into the Holbrook Side Channel such that around October 15, the pipe valve is opened to increase flow into the channel (for landlocked salmon and brook trout spawning), and around June 1, the pipe valve is closed to decrease flow into the channel (for landlocked salmon and brook trout fry emergence and production). - Perform annual inspection of the inflow pipes to ensure they are functioning properly, and remove accumulated debris, as appropriate, to maintain flow through the pipes and function of the side channel.	GLHA proposes to continue to operate and maintain the Holbrook Side Channel that was created to provide spawning habitat for landlocked salmon and as mitigation for potential Project impacts to salmon (and brook trout) from flow fluctuations that result from the operation of McKay Station. Over the years, the Holbrook Side Channel has been observed to be regularly utilized by salmon for spawning. In combination with GLHA's proposed year-round minimum flow of 1,700 cfs, continued operation and maintenance of the Holbrook Side Channel will provide even more benefit to the landlocked salmon fishery that the West Branch is renowned for, thereby enhancing the designated uses of fishing and recreation in and on the water.
Operations Compliance	Coordinate with USGS for GLHA to fund installation, operation, and maintenance of a USGS gage downstream of McKay Station in the vicinity of Big Eddy (to be confirmed by USGS) to measure flow as described in the USGS Gage Study Report filed in the USR.	GLHA's proposal to work with USGS to install a flow gage in the West Branch downstream of McKay Station will benefit all aspects of water quality and designated uses in the reach by providing reliable flow measurements for the reach.
Operations Data	Post Ripogenus impoundment elevation and flow in the Upper Gorge daily to Brookfield's existing SafeWaters website.	GLHA's proposal to post impoundment elevation and flow information to the publicly available SafeWaters website will enhance the designated use of recreation in and on the water for both the impoundment and the West Branch of the Penobscot River.
Recreation	File with FERC a Draft Recreation Management Plan (RMP) with proposed site-specific facility upgrades/improvements. The Draft RMP will be developed in consultation with relevant resource agencies and interested stakeholders. The Draft RMP is anticipated to include a significant number of specific enhancement measures, as outlined in the FLA.	GLHA's proposal to develop a comprehensive Recreation Management Plan for the Ripogenus Project and to make significant improvements to the existing FERC-approved recreation sites will enhance the designated use of recreation in and on the water for both the impoundment and the West Branch of the Penobscot River.
Shoreline Management	File with FERC an updated Shoreline Management Plan, as needed.	GLHA's proposal to update the existing Shoreline Management Plan will ensure that appropriate shoreline management continues at the Project, which in turn will be protective of existing water quality, aquatic habitat and designated uses for both the Ripogenus impoundment and the downstream reach of the West Branch of the Penobscot River.

Type	Ripogenus Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Shoreline Management	Continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer from impoundment elevation 941.59 ft on GLHA owned land (excluding leased lots) surrounding Chesuncook Lake, Ripogenus Lake, Brandy Pond, and Black Pond.	GLHA's proposal to continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer from impoundment elevation 941.59 ft on GLHA owned land (excluding leased lots) surrounding Chesuncook Lake, Ripogenus Lake, Brandy Pond, and Black Pond, will continue to protect the shoreline surrounding the impoundment, and thus will be highly protective of existing water quality, aquatic habitat, and designated uses for the Ripogenus impoundment.
Loon Management	File with FERC an updated Loon Nest Management Plan.	GLHA's proposal to update the current Loon Nest Management Plan will provide continued mitigation for Project effects on loon nesting at the Ripogenus impoundment and thereby be protective of existing aquatic habitat in the Ripogenus impoundment.
Wetland Mitigation	Continue to operate Umbazooksus Lake Dam as run-of-river by maintaining the gate in a fully open position to enhance wetlands and wildlife habitat as mitigation for affects to wetlands associated with the Ripogenus impoundment from Project operations.	The stabilization of water levels in Umbazooksus Lake to enhance wetlands and aquatic habitat was implemented originally to provide mitigation for any ongoing effects to aquatic habitat and wetlands from the operation of the Ripogenus impoundment for the designated use of hydroelectric development. As expected, under the current and proposed stable water level regime, Umbazooksus Lake supports extensive and high-quality wetland and aquatic habitat, and will continue to do so in the future under GLHA's proposal to continue to operate Umbazooksus Lake as run-of-river. Even though GLHA's water quality and aquatic habitat studies demonstrate that the Ripogenus impoundment meets all applicable water quality and aquatic life standards, the continued operation of Umbazooksus Lake, as proposed, will continue to protect and enhance existing water quality and aquatic life habitat at the Project.
Cultural Resources	File with FERC a Historic Properties Management Plan.	GLHA's proposal to develop and file with FERC a Historic Properties Management Plan for the Project will have no effect on Project water quality, aquatic habitat or designated uses.

Table 1-5 Penobscot Mills Project Proposed Operations and PM&E Measures – Effects on Water Quality

Type	Penobscot Mills Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Operations – North Twin Impoundment Elevation	Continue to operate the North Twin Development for generation and seasonal storage with a target impoundment elevation of 490.42 ft $\pm$ 0.5 ft from May 1 through August 21 annually, and a target impoundment elevation of 488.42 ft or higher from August 22 through October 15.	GLHA's trophic state and aquatic life water quality studies demonstrate that under current operations, the North Twin impoundment meets all applicable water quality standards and designated uses. GLHA's proposal to continue to operate the North Twin development, as it does currently, will allow the impoundment to continue to meet applicable trophic state water quality and aquatic life standards, and will protect all designated uses.
Operations – North Twin	Continue to operate the North Twin Development to provide flow necessary to meet the existing 2,000 cfs minimum flow requirement in the West Branch downstream of Shad Pond.	GLHA's water quality evaluations of the North Twin Development and the West Branch downstream of North Twin dam demonstrate that under existing operations, the reach meets all applicable water quality and aquatic life standards. Continuation of existing operations, as proposed, will ensure the North Twin impoundment and the West Branch downstream of North Twin dam continue to meet applicable water quality and aquatic life standards, and will protect the designated uses.
Operations – Millinocket, Dolby, and East Millinocket Developments	Continue to operate the Millinocket, Dolby, and East Millinocket Developments as run-of-river while maintaining impoundment elevation within 1 foot from top of flashboards when installed or crest of dam without flashboards.	GLHA's studies demonstrated that under existing run-of-river operations, the Millinocket, Dolby, and East Millinocket Developments all meet applicable water quality and aquatic life standards in both the impoundments and the riverine reaches downstream of the dams. GLHA's proposal to continue to operate these three developments as run-of-river while maintaining impoundment elevations within 1 foot from top of flashboards when installed, or crest of dam without flashboards, will ensure that all water quality and aquatic habitat standards, and all designated uses, will continue to be met.
Operations – Millinocket Development Minimum Bypass Flow	Provide a year-round minimum flow of 200 cfs in the West Branch downstream of Stone Dam to support water quality, aquatic habitat, and recreational use.	GLHA conducted numerous studies of the West Branch downstream of Stone Dam, including water quality, macroinvertebrate, instream flow, angler, and whitewater boating evaluations. The details of each of these studies are provided in the various study reports and discussed at length in the FLA. Based on the results of these studies, GLHA is proposing a year-round minimum flow of 200 cfs into the West Branch downstream of Stone Dam. GLHA's water quality study of the reach below Stone Dam found that DO and temperature conditions meet the applicable Class C water quality standards. The proposed 200 cfs minimum flow will ensure that DO and temperature standards for Class C waters continue to be met. DO concentrations may increase under the proposed minimum flow regime, however, temperature

Type	Penobscot Mills Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
		conditions are not likely to change since water released from the flashboards at Stone Dam is surface water from Quakish Lake. Additionally, water quality monitoring demonstrated that Quakish Lake is a shallow, warm water lake that does not stratify. Macroinvertebrate sampling conducted in 2023 found that the macroinvertebrate community in the river right channel (representative of the mainstem river) supports a Class C macroinvertebrate community, as determined by the Department's LDM. The proposed 200 cfs minimum flow is expected to significantly enhance the aquatic life community by providing more stable minimum flows and by significantly increasing the permanently wetted area of the river reach. GLHA's instream flow study of the reach found that a flow of 50 cfs provides 40% and 50% of the maximum suitable habitat for adult brook trout and juvenile brook trout, respectively. The proposed minimum flow of 200 cfs provides approximately 57% and 73% of maximum suitable habitat for adult and juvenile brook trout, respectively (Exhibit E, Section 6.6.2.2), and will also significantly increase habitat availability for landlocked salmon and macroinvertebrates (Exhibit E, Section 6.6.2.2). Thus, the proposed 200 cfs minimum flow would be expected to significantly increase available habitat for brook trout and would enhance MDIFW's stated goal of establishing a put-and-take brook trout fishery in the reach which would ensure the reach achieves its designated uses for fishing and recreation in and on the water. GLHA conducted an Angler Flow Evaluation Study in the West Branch below Stone Dam (USR; Exhibit E, Section 6.6). The study examined angling conditions and fishability under existing leakage flows, 236 cfs and 392 cfs. The study found that the reach is fishable at leakage flows, but the flow of 236 cfs received the highest ratings from the participating anglers for such factors as wading and casting. Thus, the proposed 200 cfs minimum flow would be expected to enhance the fishability of the reach and would ensure that the designated uses of fishing and recreation in and on the water are maintained.

Type	Penobscot Mills Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Operations – Millinocket Lake Storage Impoundment Elevation	Continue to operate the Millinocket Lake Storage Development to maintain impoundment elevations between 470.0 and 480.0 ft.	GLHA's trophic state and aquatic life water quality studies demonstrated that under current operations, the Millinocket Lake Storage impoundment meets all applicable water quality standards and designated uses. GLHA's proposal to continue to operate the Millinocket Lake Storage development, as it does currently, will allow the impoundment to continue to meet applicable trophic state and aquatic life standards, and will protect all designated uses.
Operations – Millinocket Lake Storage Minimum Flow	Continue to provide a minimum flow of 60 cfs from May 1 through October 15, and a minimum flow of 60 cfs, or inflow if less, from October 16 through April 30 into Millinocket Stream downstream of the Millinocket Lake Storage Dam.	GLHA's water quality evaluations of Millinocket Stream downstream of Millinocket Lake Storage dam demonstrate that under the existing minimum flow conditions (60 cfs), the stream reach meets all applicable water quality and aquatic life standards. Continuation of this minimum flow regime, as proposed, will ensure that the Millinocket Lake Storage impoundment and Millinocket Stream downstream of the dam continue to meet applicable water quality and aquatic life standards, and will protect all designated uses.
Operations – Minimum Flow	Continue to provide a minimum flow of 2,000 cfs to the West Branch downstream of Shad Pond, which is based on the combined flows from Millinocket Stream and the West Branch.	GLHA's water quality evaluations of the riverine reach of Millinocket Stream below the Millinocket powerhouse discharge demonstrate that under existing operations, the reach meets all applicable water quality and aquatic life standards. Proposed operations will ensure the West Branch downstream of Shad Pond will continue to meet applicable water quality and aquatic life standards and will protect all designated uses.
Operations – Millinocket Lake Storage Recreation Flow	Provide target boating flows of 600 cfs from Millinocket Lake Storage Dam into Millinocket Stream for 8 hours on 4 weekend days during the period from June through September, subject to water availability. In the event of limited water availability, the boating flow will be provided for 4 hours on 4 weekend days.	Although not required by the existing license, GLHA currently provides periodic boating flow releases to Millinocket Stream downstream of Millinocket Lake Storage dam. These periodic boating flow releases have been provided voluntarily by GLHA to support a local interest in paddling the stream, and to support a local "canoe race" event. Based on a boating study of Millinocket Stream that was conducted during the previous relicensing as well as supplemental information collected during the current relicensing, flows of 500-600 cfs have been identified as favorable to canoeists and kayakers, and are generally provided. In the FLA, GLHA proposes to provide boating flows of 600 cfs from Millinocket Lake Storage dam into Millinocket Stream for 8 hours on 4 weekend days during the period from June through September, subject to water availability. (In the event of limited water availability, the boating flow will be provided for 4 hours on 4 weekend days). This proposal will meet canoe, kayak, and other paddling uses of Millinocket Stream, should have no adverse impacts on stream water quality

Type	Penobscot Mills Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
		or aquatic life, and will ensure that both the Millinocket Lake Storage impoundment and Millinocket Stream continue to fully meet water quality and aquatic life standards, as well as the designated uses of recreation in and on the water, navigation, and hydroelectric generation.
Operations Data	Continue to post North Twin and Millinocket Lake Storage impoundment elevation and flow downstream of North Twin Dam, Millinocket Lake Storage Dam, and Dolby Dam to Brookfield's existing SafeWaters website.	GLHA's proposal to continue to post impoundment elevation and flow information to the publicly available SafeWaters website will enhance the designated use of recreation in and on the water for both the North Twin and Millinocket Lake Storage impoundments, and the West Branch of the Penobscot River downstream of the dams.
Recreation	File with FERC a Draft RMP with proposed site-specific facility upgrades/improvements. The Draft RMP will be developed in consultation with relevant resource agencies and interested stakeholders. The Draft RMP is anticipated to include a significant number of specific enhancement measures, as outlined in the FLA.	GLHA's proposal to develop a comprehensive Recreation Management Plan for the Penobscot Mills Project and to make significant improvements to the existing FERC-approved recreation sites will enhance the designated use of recreation in and on the water for all of the Project impoundments, Millinocket Stream, and all reaches of the West Branch of the Penobscot River.
Shoreline Management	File with FERC an updated Shoreline Management Plan, as needed.	GLHA's proposal to update the existing Shoreline Management Plan will ensure that appropriate shoreline management practices continue at the Project, which in turn will be protective of existing water quality, aquatic habitat and designated uses for all of the Project impoundments and the downstream reaches of the West Branch of the Penobscot River and Millinocket Stream.
Shoreline Management – Millinocket Lake Storage Impoundment	Continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the Millinocket Lake Storage impoundment from impoundment elevation 480.0 ft on GLHA owned land (excluding leased lots and developed areas).	GLHA's proposal to continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the Millinocket Lake Storage impoundment (from elevation 480.0 ft) on GLHA owned land (excluding leased lots and developed areas), will continue to protect the shoreline surrounding the Millinocket Lake Storage impoundment, and thus will be highly protective of existing water quality, aquatic habitat, and designated uses for the impoundment.

Type	Penobscot Mills Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Shoreline Management – North Twin Impoundment	Continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the North Twin impoundment from impoundment elevation 491.92 ft on GLHA owned land (excluding leased lots).	GLHA's proposal to continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the North Twin impoundment (from elevation 491.92 ft) on GLHA owned land (excluding leased lots), will continue to protect the shoreline surrounding the North Twin impoundment, and thus will be highly protective of existing water quality, aquatic habitat, and designated uses for the impoundment
Shoreline Management – Millinocket Impoundment	Continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the Millinocket impoundment from impoundment elevation 458.7 ft on GLHA owned land (excluding leased lots).	GLHA's proposal to continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the Millinocket impoundment (Quakish Lake and Ferguson Pond) (from elevation 458.7 ft) on GLHA owned land (excluding leased lots), will continue to protect the shoreline surrounding the impoundment, and thus will be highly protective of existing water quality, aquatic habitat, and designated uses for the impoundment.
Shoreline Management – Dolby Impoundment	Continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the Dolby impoundment from impoundment elevation 336.2 ft on GLHA owned land (excluding leased lots and developed areas).	GLHA's proposal to continue to maintain the existing 200-foot conservation buffer and 100-foot vegetation buffer around the Dolby impoundment (from elevation 336.2 ft) on GLHA owned land (excluding leased lots and developed areas), will continue to protect the shoreline surrounding the Dolby impoundment, and thus will be highly protective of existing water quality, aquatic habitat, and designated uses for the impoundment.
Wildlife Habitat	File with FERC an updated Wildlife Management Area Plan that outlines the wildlife enhancement and management efforts to be implemented, which are anticipated to be consistent with those defined in the existing FERC-approved Wildlife Management Area.	The Wildlife Management Area along the West Branch downstream of Stone Dam was created originally to provide mitigation for any ongoing effects to fish and wildlife habitat due to the operation of the Millinocket development. As described in the current Wildlife Area Management Plan, 2,300 acres of northern Maine woodlands and associated streams and wetlands have been managed by GLHA to enhance habitat diversity and value to wildlife using forest management techniques, providing waterfowl nest boxes and belted kingfisher habitat, and maintaining seed roads for wildlife habitat. This preservation of wildlife habitat in turn provides significant water quality benefits to the West Branch of the Penobscot River. GLHA's proposal to continue to maintain the Wildlife Management Area and to update the Wildlife Management Area Plan, combined with the proposal to increase the minimum flow at Stone Dam from leakage flow to 200 cfs, will continue to protect and enhance existing water quality and aquatic life habitat in the West Branch downstream of Stone Dam, and elsewhere at the Project.

Type	Penobscot Mills Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Upstream Passage of Resident Fish – North Twin	Continue to operate and maintain the existing upstream fishway at the North Twin dam that allows resident fish, including land-locked salmon, to move upstream into the North Twin impoundment.	GLHA currently operates and maintains an existing upstream fishway at the North Twin dam. Operation of the fishway is conducted in close coordination with MDIFW and is intended to allow resident fish, including land-locked salmon, to move upstream into the North Twin impoundment. GLHA's proposal to continue to operate and maintain the fishway will have no effect on existing water quality and will continue to protect the water quality, aquatic habitat, and designated uses of the impoundment and the West Branch downstream of the North Twin dam.
American Eel Passage	In consultation with the relevant resource agencies, provide: • Within 2 years of issuance of the new license, install interim upstream American eel passage at the Dolby Dam and East Millinocket Dam. • Within 5 years of issuance of the new license, install interim upstream American eel passage at the Millinocket Lake Storage Dam. • After installation of the interim upstream American eel passage, conduct up to 2 years of upstream eel passage studies. • Within 20 years of issuance of the new license, provide downstream passage measures at the Dolby and East Millinocket Developments, to be developed in consultation with relevant fisheries resource agencies. • Within 6 months of installation of the upstream eel passage facilities at the Dolby and East Millinocket Dams, develop a Fishway Operation and Maintenance Plan that will define the operation and management of the passage facilities.	Currently, there are no upstream or downstream passage facilities for American eel at the East Millinocket or Dolby development dams on the West Branch mainstem. GLHA conducted studies of American eel passage as part of the relicensing effort, and the upstream eel studies revealed that some juvenile eels are currently reaching and passing the East Millinocket, Dolby, and Millinocket Lake storage dams. Fish community surveys conducted by GLHA in the West Branch downstream of McKay Station found no American eels, but there are scattered historic reports of eels in the West Branch below McKay Station and in the Ripogenus impoundment (Exhibit E, Section 6.6). In the FLA, GLHA proposed providing interim upstream passage for American eel at the Dolby and East Millinocket dams (within 2 years of license issuance) and at the Millinocket Lake Storage dam (within 5 years of new license issuance). GLHA also proposed conducting up to 2 years of upstream eel passage studies to evaluate the effectiveness of the interim facilities. For downstream passage, GLHA proposed providing downstream passage at the Dolby and East Millinocket developments within 20 years of new license issuance. GLHA based its proposal to delay downstream passage for 20 years on the understanding that American eels that reach waters high in a watershed (such as the Project waters) typically will not outmigrate for 6-18 years, while some may remain up to 40 years in the upper watershed (Exhibit E, Section 6.6; and USFWS 2015a [FLA, Exhibit E, Section 10.0 Literature Cited]). Thus, GLHA's proposals for upstream and downstream passage for American eel will allow the West Branch to continue to support this indigenous species that prior to Project development may have inhabited the West Branch as far upstream as Grand Falls.

Type	Penobscot Mills Project - Proposed PM&E Measure	Effects on Water Quality and Designated Uses
Wetland Mitigation	Continue to operate Umbazooksus Lake Dam as run-of-river by maintaining the gate in a fully open position to enhance wetlands and wildlife habitat as mitigation for affects to wetlands associated with the North Twin impoundment from Project operations.	The stabilization of water levels in Umbazooksus Lake to enhance wetlands and aquatic habitat was implemented originally to provide mitigation for any ongoing effects to aquatic habitat and wetlands from the operation of the Ripogenus impoundment for the designated use of hydroelectric development. As expected, under the current and proposed stable water level regime, Umbazooksus Lake supports extensive and high-quality wetland and aquatic habitat, and will continue to do so in the future under GLHA's proposal to continue to operate Umbazooksus Lake as run-of-river. Even though GLHA's water quality and aquatic habitat studies demonstrate that the Penobscot Mills Project impoundments all meet applicable water quality and aquatic life standards, the continued operation of Umbazooksus Lake, as proposed, will continue to protect and enhance existing water quality and aquatic life habitat at the Project.
Cultural Resources	File with FERC a Historic Properties Management Plan.	GLHA's proposal to develop and file with FERC a Historic Properties Management Plan for the Project will have no effect on Project water quality, aquatic habitat, or designated uses.

D. A description of any anticipated continuing impact on water quality from the continued operation of the project, including impacts on the designated uses of project waters.

Information provided in Table 1-4 and Table 1-5, above, discusses the potential impacts, including enhancements, associated with GLHA's proposals for the continued operation of the Ripogenus and Penobscot Mills Projects.

ATTACHMENT 2

NOTICE TO MUNICIPALITIES

August 6, 2026

VIA USPS CERTIFIED MAIL

Diana Lakeman, Town Clerk
Millinocket Town Office
197 Penobscot Ave
Millinocket, ME 04462

Subject: Notice of Application for Maine Water Quality Certification for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) Hydroelectric Projects

Dear Ms. Lakeman:

Great Lakes Hydro America, LLC (GLHA) holds licenses issued by the Federal Energy Regulatory Commission (FERC) for the Ripogenus Hydroelectric Project (FERC No. P-2572) and the Penobscot Mills Hydroelectric Project (FERC No. P-2458), which are undergoing relicensing by FERC.

The current licenses for the two projects were issued by FERC on October 22, 1996, and expire September 30, 2026. To obtain new licenses, GLHA must apply for and receive Water Quality Certification (WQC) from the State of Maine Department of Environmental Protection (Maine DEP) under the provisions of Section 401 of the federal Clean Water Act. The Maine DEP WQC application process requires the applicant to mail a copy of the Notice of Intent to File WQC Applications to the Municipal Office in which the Projects are located, which is why you are receiving this letter and attached notice.

GLHA is intending to file WQC applications for the two projects with the Maine DEP on or about August 28, 2026. Following submittal, a link to the WQC applications, with downloadable attachments, will be provided to you. GLHA requests that the Town of Millinocket make the WQC applications and/or links available to the public, at your office located at 197 Penobscot Ave in Millinocket, for 90 days.

If there are any questions or comments regarding this filing, please feel free to contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,



Michael Scarzello
Manager, Licensing
Brookfield Renewable

Attachment: Notice of Intent to File WQC Applications

August 6, 2026

VIA USPS CERTIFIED MAIL

Kristi Powers, Town Clerk
Town of East Millinocket
53 Main Street
East Millinocket, ME 04430

Subject: Notice of Application for Maine Water Quality Certification for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) Hydroelectric Projects

Dear Ms. Powers:

Great Lakes Hydro America, LLC (GLHA) holds licenses issued by the Federal Energy Regulatory Commission (FERC) for the Ripogenus Hydroelectric Project (FERC No. P-2572) and the Penobscot Mills Hydroelectric Project (FERC No. P-2458), which are undergoing relicensing by FERC.

The current licenses for the two projects were issued by FERC on October 22, 1996, and expire September 30, 2026. To obtain new licenses, GLHA must apply for and receive Water Quality Certification (WQC) from the State of Maine Department of Environmental Protection (Maine DEP) under the provisions of Section 401 of the federal Clean Water Act. The Maine DEP WQC application process requires the applicant to mail a copy of the Notice of Intent to File WQC Applications to the Municipal Office in which the Projects are located, which is why you are receiving this letter and attached notice.

GLHA is intending to file WQC applications for the two projects with the Maine DEP on or about August 28, 2026. Following submittal, a link to the WQC applications, with downloadable attachments, will be provided to you. GLHA requests that the Town of East Millinocket make the WQC applications and/or links available to the public, at your office located at 53 Main Street in East Millinocket, for 90 days.

If there are any questions or comments regarding this filing, please feel free to contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,



Michael Scarzello
Manager, Licensing
Brookfield Renewable

Attachment: Notice of Intent to File WQC Applications



August 6, 2026

VIA USPS CERTIFIED MAIL

Lonna Perry, Environmental Licensing Specialist I
Land Use Planning Commission
Eastern Regional Office
191 Main Street
East Millinocket, ME 04430

Subject: Notice of Application for Maine Water Quality Certification for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) Hydroelectric Projects

Dear Ms. Perry:

Great Lakes Hydro America, LLC (GLHA) holds licenses issued by the Federal Energy Regulatory Commission (FERC) for the Ripogenus Hydroelectric Project (FERC No. P-2572) and the Penobscot Mills Hydroelectric Project (FERC No. P-2458), which are undergoing relicensing by FERC.

The current licenses for the two projects were issued by FERC on October 22, 1996, and expire September 30, 2026. To obtain new licenses, GLHA must apply for and receive Water Quality Certification (WQC) from the State of Maine Department of Environmental Protection (Maine DEP) under the provisions of Section 401 of the federal Clean Water Act. The Maine DEP WQC application process requires the applicant to mail a copy of the Notice of Intent to File WQC Applications to the Municipal Office in which the Projects are located, which is why you are receiving this letter and attached notice.

GLHA is intending to file WQC applications for the two projects with the Maine DEP on or about August 28, 2026. Following submittal, a link to the WQC applications, with downloadable attachments, will be provided to you. GLHA requests that the Land Use Planning Commission make the WQC applications and/or links available to the public at your office located at 191 Main Street in East Millinocket, for 90 days, for the unorganized territories served by your office within the vicinity of the Projects.

If there are any questions or comments regarding this filing, please feel free to contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,

A handwritten signature in black ink, appearing to read "MS", is written over a light blue rectangular background.

Michael Scarzello
Manager, Licensing
Brookfield Renewable

Attachment: Notice of Intent to File WQC Applications

GREAT LAKES HYDRO AMERICA, LLC

1024 Central Street, Millinocket, ME 04462

T +1 207.723.4341 F +1 207.723.4597 brookfieldrenewableNA.com

**Notice of Intent to File
Ripogenus Project (FERC No. P-2572)
Penobscot Mills Project (FERC No. P-2458)
Maine Water Quality Certification Application with the
Maine Department of Environmental Protection**

Please take notice that Great Lakes Hydro America, LLC of 1024 Central Street, Millinocket, Maine 04462, is intending to file applications for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) hydroelectric projects with the Maine Department of Environmental Protection (Maine DEP or Department) for Water Quality Certification pursuant to the provisions of the federal Clean Water Act, Section 401. The applications will be submitted in compliance with regulations of the Federal Energy Regulatory Commission (FERC or Commission) relicensing process for the continued operation of the Ripogenus Hydroelectric Project and Penobscot Mills Hydroelectric Project located on the West Branch of the Penobscot River and Millinocket Stream, in Penobscot and Piscataquis Counties, Maine.

The applications will be filed on or about August 28, 2026. After the applications are filed, they will be available for public inspection at the Maine DEP's offices in Augusta, Maine, during normal business hours. A copy of the applications may also be seen at the municipal offices in Millinocket and East Millinocket, Maine and at the Land Use Planning Commission's Eastern Regional Office in East Millinocket, Maine.

A request for a public hearing or a request that the Board of Environmental Protection assume jurisdiction over these applications must be received by the Department in writing, no later than 20 days after the applications are filed with the Maine DEP and found by the Department to be complete and accepted for processing. Public comment will be accepted throughout the processing of the applications.

Written public comments may be sent to the Maine Department of Environmental Protection, Bureau of Land and Water Quality, 17 State House Station, Augusta, Maine 04333.



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Prepaid Mail	1		\$0.00
East Millinocket, ME 04430			
Weight: 0 lb 0.50 oz			
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Thu 08/06/2026			
Tracking #:			
70181830000209267356			
Prepaid Mail	1		\$0.00
East Millinocket, ME 04430			
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Millinocket ME 04462

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Land Use Planning Commission / Lorne Perry, Environ.

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191 Main Street

City, State, ZIP+4[®]

East Millinocket ME 04430

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Town of East Millinocket / Kristi Powers, Town Clerk

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53 Main Street

City, State, ZIP+4[®]

East Millinocket ME 04430

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USPS

ATTACHMENT 3

NOTICE TO ABUTTERS

August 7, 2026

VIA USPS

Subject: Notice of Applications for Maine Water Quality Certification for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) Hydroelectric Projects

Dear Recipient:

Great Lakes Hydro America, LLC (GLHA) holds licenses issued by the Federal Energy Regulatory Commission (FERC) for the Ripogenus Hydroelectric Project (FERC No. P-2572) and the Penobscot Mills Hydroelectric Project (FERC No. P-2458), which are undergoing relicensing by FERC.

The current licenses for the two projects were issued by FERC on October 22, 1996, and expire September 30, 2026. To obtain new licenses, GLHA must apply for and receive Water Quality Certification (WQC) from the State of Maine Department of Environmental Protection (Maine DEP) under the provisions of Section 401 of the federal Clean Water Act. The Maine DEP WQC application process requires that GLHA provide the Notice of Intent to File the WQC Applications to those landowners whose property abuts the Ripogenus or Penobscot Mills Projects, which is why you are receiving this letter. Attached is the Notice of Intent to File the WQC Applications. The applications will be filed on or about August 28, 2026.

If you have any questions regarding this notice, please contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,



Michael Scarzello
Manager, Licensing
Brookfield Renewable

Attachment: Notice of Intent to File WQC Applications

**Notice of Intent to File
Ripogenus Project (FERC No. P-2572)
Penobscot Mills Project (FERC No. P-2458)
Maine Water Quality Certification Application with the
Maine Department of Environmental Protection**

Please take notice that Great Lakes Hydro America, LLC of 1024 Central Street, Millinocket, Maine 04462, is intending to file applications for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) hydroelectric projects with the Maine Department of Environmental Protection (Maine DEP or Department) for Water Quality Certification pursuant to the provisions of the federal Clean Water Act, Section 401. The applications will be submitted in compliance with regulations of the Federal Energy Regulatory Commission (FERC or Commission) relicensing process for the continued operation of the Ripogenus Hydroelectric Project and Penobscot Mills Hydroelectric Project located on the West Branch of the Penobscot River and Millinocket Stream, in Penobscot and Piscataquis Counties, Maine.

The applications will be filed on or about August 28, 2026. After the applications are filed, they will be available for public inspection at the Maine DEP's offices in Augusta, Maine, during normal business hours. A copy of the applications may also be seen at the municipal offices in Millinocket and East Millinocket, Maine and at the Land Use Planning Commission's Eastern Regional Office in East Millinocket, Maine.

A request for a public hearing or a request that the Board of Environmental Protection assume jurisdiction over these applications must be received by the Department in writing, no later than 20 days after the applications are filed with the Maine DEP and found by the Department to be complete and accepted for processing. Public comment will be accepted throughout the processing of the applications.

Written public comments may be sent to the Maine Department of Environmental Protection, Bureau of Land and Water Quality, 17 State House Station, Augusta, Maine 04333.

SEE ATTACHMENT 9 FOR LIST OF ABUTTERS

ATTACHMENT 4

NEWSPAPER NOTICE

**Notice of Intent to File
Ripogenus Project (FERC No. P-2572)
Penobscot Mills Project (FERC No. P-2458)
Maine Water Quality Certification Application with the
Maine Department of Environmental Protection**

Please take notice that Great Lakes Hydro America, LLC of 1024 Central Street, Millinocket, Maine 04462, is intending to file applications for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) hydroelectric projects with the Maine Department of Environmental Protection (Maine DEP or Department) for Water Quality Certification pursuant to the provisions of the federal Clean Water Act, Section 401. The applications will be submitted in compliance with regulations of the Federal Energy Regulatory Commission (FERC or Commission) relicensing process for the continued operation of the Ripogenus Hydroelectric Project and Penobscot Mills Hydroelectric Project located on the West Branch of the Penobscot River and Millinocket Stream, in Penobscot and Piscataquis Counties, Maine.

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Written public comments may be sent to the Maine Department of Environmental Protection, Bureau of Land and Water Quality, 17 State House Station, Augusta, Maine 04333.

Laura George | Sr. Manager, Advertising and Marketing

Aug 6, 2026

AFFIDAVIT OF PUBLICATION

Legal Notices

NOTICE OF INTENT TO FILE

RIPOGENUS PROJECT (FERC NO. P-2572)

PENOBSCOT MILLS PROJECT (FERC NO. P-2458)

MAINE WATER QUALITY CERTIFICATION APPLICATION WITH THE
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

Please take notice that Great Lakes Hydro America, LLC of 1024 Central Street, Millinocket, Maine 04462, is intending to file applications for the Ripogenus (FERC No. P-2572) and Penobscot Mills (FERC No. P-2458) hydroelectric projects with the Maine Department of Environmental Protection (Maine DEP or Department) for Water Quality Certification pursuant to the provisions of the federal Clean Water Act, Section 401. The applications will be submitted in compliance with regulations of the Federal Energy Regulatory Commission (FERC or Commission) relicensing process for the continued operation of the Ripogenus Hydroelectric Project and Penobscot Mills Hydroelectric Project located on the West Branch of the Penobscot River and Millinocket Stream, in Penobscot and Piscataquis Counties, Maine.

The applications will be filed on or about August 28, 2026. After the applications are filed, they will be available for public inspection at the Maine DEP's offices in Augusta, Maine, during normal business hours. A copy of the applications may also be seen at the municipal offices in Millinocket and East Millinocket, Maine, and at the Land Use Planning Commission's Eastern Regional Office in East Millinocket, Maine.

A request for a public hearing or a request that the Board of Environmental Protection assume jurisdiction over these applications must be received by the Department in writing, no later than 20 days after the applications are filed with the Maine DEP and found by the Department to be complete and accepted for processing. Public comment will be accepted throughout the processing of the applications.

Written public comments may be sent to the Maine Department of Environmental Protection, Bureau of Land and Water Quality, 17 State House Station, Augusta, Maine 04333.

August 6, 2026

This is to certify the advertising

OF: Kleinschmidt

RE: Ripogenus Project

ON: August 6, 2026

Signed:

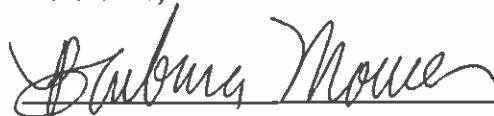


Laura George

Sr. Manager, Advertising and Marketing

Then personally appeared the above named Laura George, Sr. Manager, Advertising and Marketing, and acknowledged the foregoing instrument to be her free act and deed in her said capacity and the free act and deed of said corporation.

Before me,



Barbara Mower

Notary Public

My commission expires November 9, 2031

BARBARA MOWER
Notary Public, State of Maine
My Commission Expires 11/09/2031

ATTACHMENT 5

PRE-FILING MEETING RECORD

From: [Wendy Bley](#)
To: [Sydney Robinson](#); [Hannah Flanagan](#)
Subject: FW: Ripogenus/Penobscot Mills Projects - 401 Water Quality Certification Pre-filing Meeting Request
Date: Friday, August 14, 2026 10:17:26 AM
Attachments: [20260709_GLHA to MDEP_Req for WQC Pre-App Meeting.pdf](#)

From: Wendy Bley
Sent: Thursday, July 9, 2026 4:24 PM
To: Paye, Laura <laura.paye@maine.gov>
Cc: Scarzello, Michael <michael.scarzello@brookfieldrenewable.com>; Russell, Cate <cate.russell@hdrinc.com>
Subject: Ripogenus/Penobscot Mills Projects - 401 Water Quality Certification Pre-filing Meeting Request

Good afternoon Laura,

On behalf of Great Lakes Hydro America (GLHA), please find the attached letter requesting a Section 401 Water Quality Certification (WQC) pre-filing meeting for the Ripogenus (FERC No. 2572) and Penobscot Mills (FERC No. 2458) projects. Please let us know if any of the following dates and range of times work for you. We anticipate a relatively brief call, however we are available for whatever amount of time is needed by the Department.

Monday 7/13 – 1 PM to 4 PM
Tuesday 7/14 – 11 AM to 4 PM
Wednesday 7/15 – Anytime
Thursday 7/16 – Anytime

Thank you, Wendy Bley

Wendy Bley
Senior Regulatory Advisor

Office: 804-883-5869
Mobile: 804-307-2219
Wendy.Bley@KleinschmidtGroup.com

July 9, 2026

VIA EMAIL

Laura Paye
Hydropower Coordinator
Maine Department of Environmental Protection 17
State House Station
Augusta, ME 04333-0017

**Subject: Ripogenus Hydroelectric Project (FERC No. 2572)
Penobscot Mills Hydroelectric Project (FERC No. 2458)
Request for Pre-Filing Meeting for Section 401 Water Quality
Certification**

Dear Ms. Paye:

On September 30, 2024, Great Lakes Hydro America (GLHA) filed the Final License Application with the Federal Energy Regulatory Commission (FERC) for the Ripogenus (FERC No. 2572) and Penobscot Mills Projects (FERC No. 2458) (Projects). On June 29, 2026, FERC issued a Notice of Application Acceptance and Ready for Environmental Analysis (REA) for each Project.

GLHA is preparing to file an application for Water Quality Certification (WQC) under Section 401 of the Clean Water Act with the Maine Department of Environmental Protection (MDEP). Pursuant to 18 Code of Federal Regulations (CFR) §5.23(b)(1), a license applicant must file an application for WQC no later than 60 days following the date of issuance of the REA notice, which requires GLHA to file a WQC application for the Projects by August 28, 2026.

Pursuant to 40 CFR §121.4(a), an applicant is required to request a pre-filing meeting with the certifying authority at least 30 days prior to submitting a certification request. Accordingly, GLHA is hereby requesting a pre-filing meeting with the MDEP for the Ripogenus and Penobscot Mills Projects.

If you have any questions regarding this letter, please contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,



Michael Scarzello
Manager, Licensing
Brookfield Renewable N.A.

**Ripogenus and Penobscot Mills Projects
Section 401 Water Quality Certification
Pre-Filing Meeting with
Maine Department of Environmental Protection**

Location: Teleconference
Project Name and #: Ripogenus Project (FERC No. 2572)
Penobscot Mills Project (FERC No. 2458)
Date: July 15, 2026 10:00 AM

Agenda (notes provided as list under topic headings):

1. Project applications
 - a. MDEP confirmed that GLHA should file two separate applications – one for each project.
 - b. Applications are due by Friday August 28, 2026; Laura expects the letter from MDEP indicating receipt and applications accepted will be provided to GLHA the week following August 28.
2. 508 Accessibility Format
 - a. Required for application forms.
3. Application filing procedure
 - a. Applications should include proof of payment (scan copy of checks).
 - b. Applications should be emailed to the MDEP via the formal email address (application form and proof of payment); additional files can be emailed separately to Laura and Claire at MDEP.
 - c. Application file size limit is 20 MB.
 - d. Send separate emails for each application/project.
4. Payment delivery
 - a. Payment options include via mail/FedEx or hand delivery (Administration Desk is staffed from 8AM-5PM) at the MDEP building in Augusta.
 - b. Same address whether sending via mail or hand delivery.
5. Application fee confirmation
 - a. GLHA (Wendy Bley) to send information to MDEP to confirm application fees.
6. Newspaper notice
 - a. MDEP confirmed that 1 notice that addresses both projects is fine.
 - b. GLHA is planning to publish notice in the Bangor Daily News – MDEP confirmed this is good.
7. MDEP 401 application record and FERC eLibrary document links
 - a. GLHA should include a list of applicable documents and associated links to FERC eLibrary.
 - b. MDEP asked that GLHA call out any changes to the proposal in the FLA (i.e., the FLA update filed on 7/14/2026).
8. Effective Date of WQC
 - a. Will be consistent with new licenses.

ATTACHMENT 6

CERTIFICATE OF GOOD STANDING



MAINE

Department of the Secretary of State
Bureau of Corporations, Elections and Commissions

Corporate Name Search

Information Summary

[Subscriber activity report](#)

This record contains information from the CEC database and is accurate as of: Fri Apr 24 2026 06:38:05. Please print or save for your records.

Legal Name	Charter Number	Filing Type	Status
BROOKFIELD RENEWABLE ENERGY GROUP LLC	20170369FC	LIMITED LIABILITY COMPANY DOING BUSINESS IN MAINE	GOOD STANDING

Qualification Date	Expiration Date	Jurisdiction
11/14/2016	N/A	DELAWARE

Other Names (A=Assumed ; F=Former)

NONE

Principal Home Office Address

Physical

250 VESEY STREET, 15TH FLOOR
BROOKFIELD PLACE
NEW YORK, NY 10281-1023

Mailing

250 VESEY STREET, 15TH FLOOR
BROOKFIELD PLACE
NEW YORK, NY 10281-1023

Clerk/Registered Agent

Physical

CORPORATION SERVICE COMPANY
45 MEMORIAL CIRCLE
AUGUSTA, ME 04330

Mailing

CORPORATION SERVICE
COMPANY
45 MEMORIAL CIRCLE
AUGUSTA, ME 04330

New Search

Click on a link to obtain additional information.

List of Filings

[View list of filings](#)

Obtain additional information:

Certificate of Existence (Good
Standing) ([more info](#))

[Short Form without amendments](#)
([\\$30.00](#))

Certificate of Legal Existence ([more
info](#))

[Short Form without amendments](#)
([\\$30.00](#))

You will need Adobe Acrobat version 3.0 or higher in order to view PDF files.
If you encounter problems, visit the [troubleshooting page](#).



If you encounter technical difficulties while using these services, please contact the [Webmaster](#). If you are unable to find the information you need through the resources provided on this web site, please contact the Division of Corporations, UCC & Commissions Reporting and Information Section at 207-624-7752 or [e-mail](#).

© Department of the Secretary of State

ATTACHMENT 7
CZMA DETERMINATION

From: [Burrowes, Todd](#)
To: [Cousens, Dawn](#)
Cc: [Gibson, Jim](#); [Russell, Cate](#); [Howatt, Kathy](#)
Subject: RE: Ripogenus Hydroelectric Project (FERC No. 2572) and Penobscot Mills Hydroelectric Project (FERC No. 2458) - CZMA
Date: Friday, May 21, 2021 10:51:15 AM

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Dawn. I'm writing to confirm that the Ripogenus Hydroelectric Project (FERC No. 2572) and the Penobscot Mills Hydroelectric Project (FERC No. 2458) are located outside Maine's coastal zone as designated under the Coastal Zone Management Act (CZMA) and CZMA consistency review is not required.

- Todd Burrowes

Federal Consistency Coordinator

Maine Department of Marine Resources, Coastal Program

From: Cousens, Dawn <Dawn.Cousens@hdrinc.com>
Sent: Thursday, May 13, 2021 10:17 AM
To: Burrowes, Todd <Todd.Burrowes@maine.gov>
Cc: Gibson, Jim <Jim.Gibson@hdrinc.com>; Russell, Cate <Cate.Russell@hdrinc.com>
Subject: Ripogenus Hydroelectric Project (FERC No. 2572) and Penobscot Mills Hydroelectric Project (FERC No. 2458) - CZMA

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Burrowes,

HDR is providing relicensing support for the Ripogenus Hydroelectric Project (FERC No. 2572) and the Penobscot Mills Hydroelectric Project (FERC No. 2458) on behalf of Great Lakes Hydro America, LLC. The Projects are located on the West Branch of the Penobscot River and Millinocket Stream in Piscataquis and Penobscot Counties, Maine (map attached).

It is our understanding that the Projects are not located in the coastal zone and that a CZMA review is not necessary. Could you please confirm this is correct?

Please let me know if you need additional information.

Thank you,

Dawn Cousens
Aquatic Scientist

HDR
970 Baxter Boulevard
Portland, ME 04103
☎ 207.775.4495 📠 207.239.3791

dawn.cousens@hdrinc.com

hdrinc.com/follow-us

ATTACHMENT 8

FEE PAYMENT

Brookfield
Renewable N.A.

August 27, 2026

VIA HAND DELIVERY

Laura Paye
Maine Department of Environmental Protection
Bureau of Land and Water Quality
17 State House Station
Augusta, ME 04333

RECEIVED
MAINE D.E.P.

2026 AUG 27 AM 10: 26

RECEIVED
MAINE D.E.P.

2026 AUG 27 AM 10: 26

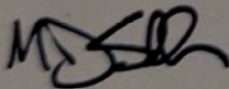
**Subject: Application for Water Quality Certification
Penobscot Mills Hydroelectric Project (FERC No. 2458)**

Dear Ms. Paye:

Great Lakes Hydro America, LLC (GLHA) hereby encloses payment in the amount of \$55,514.00 (fifty-five thousand five hundred fourteen dollars) for the processing of the Penobscot Mills Hydroelectric Project (FERC No. 2458) water quality certification application (check number 101003).

If there are any questions or comments regarding this filing, please feel free to contact me by phone at (315) 566-0197 or by email at michael.scarzello@brookfieldrenewable.com.

Sincerely,



Michael Scarzello

Manager, Licensing
Brookfield Renewable

Attachment A- check number 101003

GREAT LAKES HYDRO AMERICA, LLC
1024 Central Street, Millinocket, ME 04462

T +1 207.723.4341 F +1 207.723.4597 brookfieldrenewableNA.com

Brookfield
Renewable

Great Lakes Hydro America, LLC
200 Liberty Street
14th Floor
New York NY 10281
United States

000004

TREASURER STATE OF MAINE
72 STATE HOUSE STATION
AUGUSTA ME 04333
UNITED STATES

Page 1 of 1

CHEQUE DATE: 2026-08-10
CHEQUE #: 101003
SUPPLIER #: TREAOF001
OUR ACCOUNT #: 000184225

INVOICE #	DATE	ON BEHALF OF	GROSS AMOUNT	DISCOUNT	NET AMOUNT
WQCPMILLS2026	2026-07-22	Great Lakes Hydro America, LLC	\$55,514.00	\$0.00	\$55,514.00
AMOUNT			\$55,514.00	\$0.00	\$55,514.00

Go Green, Get Paid Faster!

Switch to our new ePayments and receive your funds via ACH.

Email: payments@brookfieldrenewable.com or call: 1-844-233-0255 to enroll today!

003CD70009

PLEASE DETACH BEFORE DEPOSITING

960BROOKA.912.B.FDX_PULLS.Run18581/000004/000004/i

Brookfield
Renewable

Great Lakes Hydro America, LLC
200 Liberty Street
14th Floor
New York NY 10281
United States

HSBC Bank USA, N.A.
452 Fifth Avenue
New York NY 10018
United States
1-108/210

TO THE ORDER OF: TREASURER STATE OF MAINE
72 STATE HOUSE STATION
AUGUSTA ME 04333
UNITED STATES

PAY: ***FIFTY-FIVE THOUSAND FIVE HUNDRED-FOURTEEN DOLLARS AND ZERO CENTS US FUNDS ONLY

Cheque Number 101003
Date 2026 08 10
YYYY MM DD

\$*****55,514.00

US FUNDS

Per

Per

⑈ 10 1003 ⑈ ⑆ 02 100 1088 ⑆ 000 184 225 ⑈

APPENDIX 1

FINAL LICENSE APPLICATION (FLA) FOR THE RIPOGENUS AND PENOBSCOT MILLS HYDROELECTRIC PROJECTS

Hyperlink to Final License Application:

https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20240930-5071&optimized=false&sid=29af5d05-fc0d-4007-ae26-75019e82e661

Hyperlink to Final License Application Update:

https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20260714-5185&optimized=false&sid=29af5d05-fc0d-4007-ae26-75019e82e661

APPENDIX 2

PROJECT RELICENSING DOCUMENTS ON FERC DOCKET

Ripogenus (P-2572) and Penobscot Mills (P-2458) Hydroelectric Projects

List of Relicensing Filings with Hyperlinks

Date	Document Name	Accession Number	Hyperlink
4/24/23	Initial Study Report (ISR)	20230424-5265	Initial Study Report
5/22/23	ISR Meeting Summary	20230522-5187	ISR Meeting Summary
8/1/23	3 rd Study Progress Report	20230801-5053	3rd Study Progress Report
8/7/23	GLHA Response to ISR Comments	20230807-5172	GLHA Responses to ISR Comments
8/30/23	GLHA Response to MDIFW Comments	20230830-5046	GLHA Response to MDIFW Comments
11/1/23	4 th Study Progress Report	20231101-5177	4th Study Progress Report
12/19/23	GLHA Response to Trout Unlimited Special Request	20231219-5118	GLHA Response to Trout Unlimited Special Request
1/19/24	Interim Plan for Aquatic Resource Protection During McKay Station Outages (until the current relicensing process is concluded)	20240119-5146	Interim Plan for Aquatic Resource Protection During McKay Station Outages
2/2/24	5 th Study Progress Report	20240202-5178	5th Study Progress Report
2/5/24	Operations Model Technical Workshop Follow-up	20240205-5126	Operations Model Technical Workshop Follow-up
3/25/24	Updated Study Report Meeting Notification and Waiver Request	20240325-5089	Updated Study Report Meeting Notification and Waiver Request
4/22/24	Updated Study Report (USR)	20240422-5168	Updated Study Report
5/3/24	Supplement to USR	20240503-5062	Supplement to USR
5/3/24	Draft License Application (DLA)	20240503-5257	Draft License Application

Date	Document Name	Accession Number	Hyperlink
5/3/24	GLHA Response to Alternative Operating Scenario Requests	20240503-5152	GLHA Response to Alternative Operating Scenario Requests
5/31/24	USR Meeting Summary	20240531-5317	USR Meeting Summary
6/21/24	GLHA Response to FERC AIR – Interim Plan for Aquatic Resource Protection During Outages at McKay	20240621-5137	GLHA Response to FERC AIR – Interim Plan for Aquatic Resource Protection During Outages at McKay
6/28/24	Supplement to USR	20240628-5303	Supplement to USR
7/22/24	Operations Model Study Supplemental Information	20240722-5082	Operations Model Study Supplemental Information
7/30/24	GLHA Response to USR Comments	20240730-5118	GLHA Response to USR Comments
7/31/24	Flow Modification Report for Ripogenus Ramping Study	20240731-5199	Flow Modification Report for Ripogenus Ramping Study
8/1/24	6 th Study Progress Report	20240801-5050	6th Study Progress Report
9/30/24	Final License Application (FLA)	20240930-5071	Final License Application
9/30/24	GIS Shape Files for FLA	20240930-5301	GIS Shape Files for FLA
10/15/24	FLA Public Viewing Availability Update	20241015-5124	FLA Public Viewing Availability Update
10/21/24	FLA Proof of Public Notice	20241021-5156	FLA Proof of Public Notice
11/13/24	Level 2 Whitewater Boating Study Report	20241113-5076	Level 2 Whitewater Boating Study Report
5/29/25	GLHA Response to FERC 2/28/25 AIR	20250529-5238	GLHA Response to FERC 2/28/25 AIR
7/2/25	Response to AIR on the Final License Application — Drone Videos	20250702-5106	Response to AIR on the Final License Application — Drone Videos
7/16/25	Response to Additional Information Requests on the	20250716-0005	Response to Additional Information Requests on the Final License Application — Drone Videos

Date	Document Name	Accession Number	Hyperlink
	Final License Application — Drone Videos		
7/28/25	Additional GLHA Response to FERC 2/28/25 AIR	20250728-5100	Additional GLHA Response to FERC 2/28/25 AIR
5/6/26	GLHA Response to 2/5/26 AIR	20260506-5101	GLHA Response to 2/5/26 AIR
5/12/26	GLHA Response to Comments on Draft RMP	20260512-5054	GLHA Response to Comments on Draft RMP
6/2/26	GLHA Response to Caribou and Chesuncook Lake Camp Assoc. Comments	20260602-5081	GLHA Response to Caribou and Chesuncook Lake Camp Assoc. Comments
7/14/26	FLA Update	20260714-5185	FLA Update
7/14/26	GLHA Response to Maine Prof. Rafting Outfitters WW Boating Flow Proposal	20260714-5135	GLHA Response to Maine Prof. Rafting Outfitters WW Boating Flow Proposal