



STATE OF MAINE
DEPARTMENT OF
INLAND FISHERIES & WILDLIFE
353 WATER STREET
41 STATE HOUSE STATION
AUGUSTA ME 04333-0041



April 8, 2024

Laura Paye
Hydropower Coordinator
Bureau of Land Resources
Maine Department of Environmental Protection

RE: MDIFW Comments on Green Lake Hydroelectric Project (FERC No. 7189) Draft Water Quality Certification #L-020024-33-D-N

Dear Laura:

The Maine Department of Inland Fisheries and Wildlife has reviewed the Draft Water Quality Certification for the Green Lake Hydroelectric Project (FERC No. 7189). The Project is located on Green Lake and Reeds Brook in the City of Ellsworth, Hancock County, Maine. We appreciate that most of our concerns detailed in the FERC Draft License Application and Final License Application have been incorporated. We are requesting a few additional points of clarification in the Draft Certification.

General Clarification

Page 9 states the following: “*MDIFW has stocked lake trout in Green Lake since 1961 and landlocked salmon from 2010 to 2020.*”

MDIFW Clarification: Green Lake has been stocked with landlocked salmon regularly since the 1930’s.

Page 28 states the following: “*Reeds Brook and Green Lake are critical habitat for the federally endangered Atlantic Salmon, and the fish assemblage within the Green Lake Project boundary consists of, but is not limited to, river herring (alewife and blueback herring), American eel, American shad, Atlantic salmon, and sea lamprey.*”

MDIFW Clarification: River herring are currently not present in Green Lake as there has not been passage at the dam since the late 1800’s. There was an illegal introduction of anadromous alewives discovered in the fall of 2020, but MDIFW has not detected any since then. Other than American Eels, there are no known migratory fish naturally established in Green Lake, although they may have been historically present in the Lake. Does the “Project Boundary” extend lower in the watershed where other species of migratory fish are known to occur?

Fish Passage and Aquatic Invasive Species

MDIFW requests additional language in the Water Quality Certification to acknowledge that any planning to improve fish passage for migratory fish at the Green Lake Dam will be coordinated with MDIFW to prevent the spread of invasive aquatic species threats. Current draft language creates an expectation that the Licensee will consult with MDIFW and DMR regarding fish passage, and we would request extending this expectation for consultation to include preventing the spread of invasive aquatic threats for

transparency and awareness. Aquatic Invasive Species (AIS) represent one of the greatest threats to conserving Maine's unique assemblage of native coldwater fish. Controlling the spread of known and possible future AIS aligns with the Department's statutory authority and mandate and is outlined in both MDIFW's 2021–2035 Statewide Fisheries and Hatcheries Management Plan and the 2015 State Wildlife Action Plan. Moreover, the Maine State Legislature established an Interagency Task Force that subsequently developed the initial State of Maine Action Plan for Managing Invasive Aquatic Species to prevent further introductions of exotic species which can displace native species, reduce biodiversity, disrupt food webs, and degrade native habitats. AIS currently exist downstream of Green Lake, including largemouth bass, and in time new threats may establish over the lengthy duration (40-50 years) of any new issued FERC license. Invasive threats (current and potential future AIS) will need to be controlled in conjunction with any new fish passage measures at Green Lake.

Thank you for the opportunity to review the Draft Water Quality Certification for the Green Lake Hydroelectric Project. Please feel free to contact my office if you have any questions regarding this information, or if I can be of any further assistance.

Best regards,

A handwritten signature in blue ink, appearing to read 'John Perry', with a stylized flourish at the end.

John Perry
Environmental Review Coordinator

Cc: Greg Burr, Colin Shankland, Jacob Scoville--MDIFW Fisheries Division, Region C
Francis Brautigam, Joe Overlock--MDIFW Augusta Headquarters
Casey Clark--MDMR