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Kathy Howatt  
Hydropower Coordinator  
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Bureau of Land Resources, Land Division

RE: MWDCAs Comments, Proposed Surrender and Removal of Saccarappa Dam (FERC 2897), Final Application, Sappi North America.

The MWDCAs permit application has been reviewed by the Fisheries Division of the Maine Department of Inland Fisheries and Wildlife (MDIFW). The following comments are offered for consideration. *Italic text* in quotes reflects information contained in the draft license application. MDIFW comments are not italicized.

The MDIFW supports efforts by sister fisheries agencies, including the Maine Department of Marine Resources (MDMR) and the United States Fish and Wildlife Service (USFWS) to establish passage for migratory fish consistent with Maine's "Draft Fisheries Management Plan for the Presumpscot River Drainage" jointly developed by the MDIFW and the MDMR. While the MDIFW has not actively participated in the technical review of fish passage options, it is recognized that resident freshwater fish may benefit from installed passage provisions, but acknowledge design considerations are most germane to migratory fish and those agencies responsible for their management.

The MDIFW remains committed to providing viable recreational fisheries for trout, and to some extent salmon in the Presumpscot River. This commitment is reflected in prior relicensing comments filed with FERC and the MDEP on this and other hydroelectric facilities, as well as management objectives detailed in the "Draft Fisheries Management Plan for the Presumpscot River Drainage". Because the Presumpscot River is a highly regulated river, existing dams limit the availability of free flowing pool-riffle habitat suitable for trout, as well as salmon. As a result, the creation of salmonid fisheries has been largely confined to higher gradient tailwater and bypass areas below hydroelectric facilities.

Under the proposed surrender the applicant contends the following additional potential pool-riffle habitat will be created as a result of lowering the existing head pond by 4.5 feet and removal of the eastern spillway:

- *1,000 square yards of shallow riffle/pool type habitat at Saccarappa dam*
- *A total of 2680 linear feet of river below Mallison Dam that will become free flowing and converted to a series of riffle and pool segments that will be quite shallow and will have visually discernable current.*

- *The current length of the impoundment in the Little River from the confluence with the Presumpscot River to the upstream limit of the impoundment is approximately 7,600 feet...after the removal of the spillways at Saccarappa Falls will be approximately 83 feet. These changes will create a free flowing river with a series of riffle and pool segments.*

To the extent the habitat is modified as discussed, these changes have the potential to improve suitability for trout and salmon, as well as improve the macroinvertebrate population upon which these fisheries depend. These proposed changes in habitat are supported by the MDIFW, and is consistent with our fishery management focus. While the proposed 4.5 foot reduction in head pond is expected to enhance habitat suitability for salmonids, there remains some uncertainty as to whether the head pond should be lowered by more than 4.5 feet to effectively restore historic water levels, and in so doing reestablish all lost historical riffle/pool habitat. The MDMR recently (November 15, 2015) filed comments with FERC raising questions regarding the validity of Sappi's conclusion that a reduction in the head pond by only 4.5 feet will restore "historic levels". Given the many apparent alterations to the natural configuration of this dam site, the comments conveyed by MDMR certainly raise some legitimate questions regarding water levels that existed prior to dam construction. This matter is deserving of additional consideration as resolution has important implications in the creation of effective fish passage, as well as restoring and/or enhancing fish habitat. If the actual historic water levels can't be more definitively concluded, perhaps some additional analysis and consideration has merit given potential benefits of lower waters levels expressed by state and federal fisheries agencies, as well as numerous NGOs.

The existing Sappi-owned boat ramp near Saccarappa's the Western Channel will be effectively eliminated *because in the future the velocity of the water flowing past the boat launch in that area of the channel will be too high to safely launch watercraft.* A replacement boat launch is not proposed by Sappi because of the existence of a city owned boat launch on the east side of the river. The MDIFW requested the installation of the existing boat launch on Sappi-owned property and through the FERC and MWDCA licensing process retains some authority to influence the future operation and management of the facility to meet public needs. The operation of the City's launch is not known to MDIFW, and there is no mechanism for our agency to address operational and public access needs with the city currently, or into the future. Additional information on the current operation of the City launch including such details as hours of operations, user fees, prohibited uses, etc., would be useful in considering the public need for a replacement boat launch.

Respectfully,

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Regional Fishery Biologist  
Sebago Lake Region, MDIFW

cc: John Perry, MDIFW  
Sean McDermott, NMFS  
Steve Shepard, USFWS  
Oliver Cox, MDMR  
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