

Melvin Croft

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January 24, 2025

Attn: Ronald Mongeon, Presiding Officer & Eastern Maine Regional Office Director
Maine Department of Environmental Protection
106 Hogan Road Bangor, ME 04401
Ronald.Mongeon@maine.gov

In Re: Petition to set Water Level/Minimum Flow
of North Pond, Smithfield, Mercer and Rome, Maine
DEP # L-30629-36-A-N, in the Towns of Smithfield, Mercer and Rome

I'm not a lake scientist. I'm a retired Earth Scientist/Geologist with a long and successful career in industry. As such, I have adequate knowledge of chemistry, physics, math, and biology to understand the concepts of lake science.

I serve on the board of directors of the 7 Lakes Alliance (7LA), whose mission is to conserve the lands and waters of the Belgrade Lakes region for all. And I'm very proud of our work. I am also a LakeSmart evaluator with 15 years of experience.

The Belgrade Lakes watershed is fortunate to have two highly qualified and experienced organizations dedicated to protecting our lands and lakes; Colby College and 7 Lakes Alliance. By virtue of a memorandum of understanding, Colby works closely with 7LA to monitor and collect data on our lakes, including North Pond, to develop sound recommendations on how to manage our lakes given the extensive development in the watershed. They also work closely with the five Belgrade Lakes associations to protect our lakes. Colby and 7LA have a long history of using sound scientific principles, guided by the scientific process, to ensure the measures they take are logical and beneficial to all stakeholders.

The petitioners clearly care about North Pond and wish to improve water quality. However, they lack the scientific credentials necessary to understand the lake dynamics and make solid logical proposals to reach their desires. Much of their

beliefs are based on decades old paradigms, which are not supported by scientific data. For instance, the myth still holds among many locals that the North Pond white perch population is threatened if water flow is not maintained in the spring when the fish are spawning. Maine state biologists refute this claim. See last two sentences below from the petition.

4. Both this year, 2022, and in past years, the North Pond Association has been largely hands-off with the dam, which has resulted in stagnated water. This year, the dam was closed in mid-May and is not planned to be opened again until after the summer season. The dam was managed the same way in 2021, with little water flow during summer months. This has created high waters which cause excessive shoreline erosion from wave action. Early closure also interrupts the spawn of white perch and other fishes. Their absence in local fishing areas have affected both local fishermen and tourists.

The petitioners' observations are also sometimes weak or exaggerated. The map of North Pond included in their petition highlights the entire shoreline of the lake as having severe erosion, which is not supported by photos or any other facts (see Figure 1 below). They also include a photo (see Figure 2 below) supposedly depicting erosion along the shoreline due to changing water levels. This photo is not from the shoreline, but upslope from the shoreline and is the result of erosion due to inadequate management of the buffer zone over the years – which according to Colby and 7LA is one of the, if not the major, sources of phosphorous entering North Pond; the external load.

While in general 7LA and Colby agree that continuous water flow would be a good goal for North Pond, each lake in the Belgrade's is unique and should be addressed specifically rather than relying on general assumptions. The petitioners

have not presented any scientifically based assessment that supports their recommendations. While controlling water levels **may** prove to be the correct action to take, practically speaking it will be extremely difficult to implement.

While I respect the petitioners desire to protect North Pond, the best way to do so is to work with the scientific experts from Colby and 7LA to develop measures based on solid scientific principles that consider all factors, including the needs of those who live on the lakes, prior to making any recommendations or taking any actions. I believe that we should follow the science, as Neil deGrasse Tyson explains;

The good thing about science is that it's true whether or not you believe in it.

Please allow me five minutes to present my case.

Melvin Croft


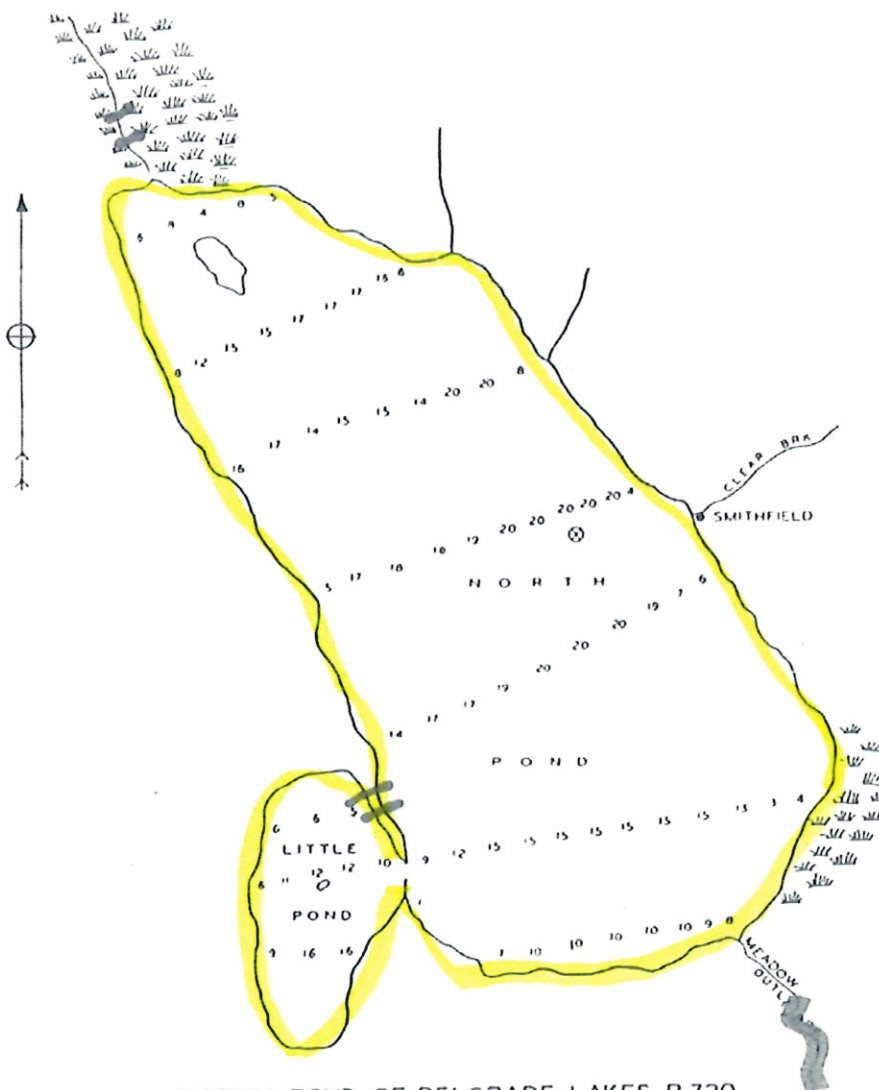
A handwritten signature in black ink, appearing to read "Mel Croft". The signature is stylized, with the first name "Mel" written in a cursive-like script and the last name "Croft" written in a more blocky, capital-letter style.

Figure 1.



NORTH POND OF BELGRADE LAKES P 720
 MERCER AND SMITHFIELD TWPS IN SOMERSET CO
 AND ROME TWP. IN KENNEBEC CO.
 ELEV 250 FT AREA 2,225 ACRES
 0 2 4 6 8 10
 TENTHS OF MILE

- severe shoreline erosion
 significant damage & loss of shoreline tree canopy
- Negative impact to natural environment
 & historical use of meadow outlet stream below the dam due to little to no water flow from April to October.
- = Permanent damage to bog areas noted.

Figure 2



Intervenor Affidavit Attestation:

I do hereby attest this submission in entirety and content thereof is true, accurate and complete to the best of my knowledge.

Mel C

Signature

1-24-25

Date

MELVIN CRAFT

Printed

1-24-25

Date

Maine State Notary Acknowledgement

State of Maine, County of Somerset

The foregoing instrument was acknowledged before me this 24 day
of January (date) at Smithfield

Maine, by Melvin Craft
(name of person acknowledged) to be his free act and deed.

Nichole J Clark

(Notary Public Signature)

Printed Name of Notary Public)

Notary Public State of Maine

My Commission Expires: _____



NICHOLE J CLARK

NOTARY PUBLIC

State of Maine

My Comm. Expires June 22, 2028