

Maine Department of Environmental Protection
c/o Laura Paye, via email to DEP-Hydropower@maine.gov
Hydropower Coordinator
Bureau of Land Resources

August 15, 2025

Comments requesting conditions for the Ellsworth Hydroelectric Project (FERC P-2727) to meet Water Quality Certification

Dear Coordinator Paye,

Thank you for the opportunity to comment on Brookfield's application for water quality certification around the Ellsworth Hydroelectric project.

The Union River is historic and ongoing home to many native fish species, including eel, herring, shad, and sea lamprey. Salmon and sturgeon are widely seen in the historic record, and might return as common residents if conditions improve in the rivers they call home.

However, the presence and operation of Ellsworth and Graham Lake dams pose significant threats to these fish. Water quality impacts of the dams include depleting dissolved oxygen in the impoundments and overflowing areas that species like sturgeon would otherwise use for breeding. Most notably, there are ongoing fish kills at the Ellsworth dam. These are documented in public comment, in local media, and noted by agencies.

Without addressing water quality concerns and including downstream and upstream passage to allow native fish to survive, Brookfield's operations cannot be thought of as ensuring water quality. I urge the Department to use this moment of reviewing the Water Quality Certification to bring about changes to the operations of the Ellsworth Hydroelectric Project and improve the quality of not just water, but life, for fish and humans alike.

Thank you,
Eliza Oldach
Neighbor (Bar Harbor), conservation professional, and river appreciator