



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



June 26, 2026

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

RE: Draft Water Quality Certification for the Lewiston Falls Hydroelectric Project (P-2302, L-29808-33-D-N)

Laura,

Enclosed, please find the Maine Department of Inland Fisheries and Wildlife (MDIFW) comments on the draft Water Quality Certification for the Lewiston Falls Hydroelectric Project (FERC No. P-2302, DEP No. L-29808-33-D-N).

Thank you for the opportunity to comment on this draft Water Quality Certification. If you have any questions about this submission, please contact me at 207-441-9854 or at Andrew.J.Wood@Maine.gov.

Respectfully,

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Cc: Claire Briggs, Maine Department of Environmental Protection
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Maine Department of Inland Fisheries and Wildlife Comments on Draft WQC

1. Impoundment Fluctuations Affecting Inland Fisheries

Brookfield currently operates the Project in a run-of-river mode by typically limiting impoundment drawdowns to no more than 1 foot below the normal elevation of 168.17 feet. However, the Project is licensed to operate with up to four feet of impoundment drawdowns. MDIFW understands this is intended to provide the Lewiston Falls Project with flexibility to regulate flows received from the upstream peaking Gulf Island – Deer Rips facility, and that below Lewiston Falls flows in the Androscoggin River are typically re-regulated such that downstream hydropower facilities can better operate run-of-river.

Typically, MDIFW recommends that hydropower projects limit impoundment fluctuations to one foot or less without prior notification to the Department. This protects inland aquatic species from habitat loss and reproductive failure and is particularly important during the spawning seasons for each fish species. In the draft Water Quality Certification (WQC), MDEP supports MDIFW's request for hard limits to impoundment fluctuations of one foot or less, daily, during the May 15-June 30 bass spawning season. MDIFW appreciates the incorporation of this condition, which improves upon ambiguous language proposed in the Final License Application (FLA), and which should promote successful bass spawning and the success of its associated fishery.

Although bass species represent some of the most abundant sportfish in the Project impoundment, and the proposed WQC conditions will help limit impacts to the bass fishery, other fish species will not be adequately protected under higher water level fluctuations. The Project area includes other fish species that spawn during alternative times of year (Cyprinids, other Centrarchids, etc.), and these species will still be vulnerable to large drawdowns and are afforded limited protections under allowable project operations, as proposed. By changing impoundment level elevation, significant drawdowns are likely to alter the amount of usable spawning habitat for other resident fish species.

MDEP notes that a four-foot drawdown would maintain over 75% of littoral zone surface area, consistent with MDEP requirements. However, MDIFW notes that, per Table 3-7 of the Water Quality Study Report in the FLA, a four-foot drawdown would result in the loss of nearly a third (31.2%) of littoral volume in the impoundment, potentially limiting the amount of area watered at a sufficient depth to support successful spawning. In contrast, a one-foot drawdown resulted in a much smaller loss of littoral volume (8%). Thus, a four-foot drawdown may still have negative impacts beyond loss of littoral zone surface area, and as such MDIFW requests that the licensee also limit large-scale water level fluctuations to the extent practicable during the remainder of the year outside the bass spawning season—for the benefit of the entire fish assemblage present in the Project Area.

2. Impoundment Fluctuations Affecting Recreational Opportunities.

MDIFW also has concerns with large impoundment fluctuations from a recreational access perspective. As shown in Table 3-2 of the Recreation Study Report of the FLA, the Lewiston Falls Impoundment (Higgins) Boat Launch represented the greatest number of recreation days for fishing and boating across all sites, both Project and non-Project. Drawdowns greater than one foot have the potential to affect safe water levels at this boat launch and provide an inconsistent environment for anglers. While the proposed enhancements to the Higgins concrete boat ramp will be beneficial to the launch area and its accessibility, they do not address the potential of larger drawdowns to adversely affect angling opportunities dependent on the success of impoundment fisheries.

3. Request for Tailrace Recreational Access Evaluation and Consultation

Currently, it is MDIFW's position that the Project has adequate facilities for *trailer*ed boat access to the impoundment and riverine reaches below. MDIFW finds the Licensee's proposed recreational access changes at the three existing recreational facilities (Higgins Boat Launch, Durham Boat Launch, West Pitch Park) generally beneficial; however, they do not address the lack of access to water immediately below the dam.

Currently there is inadequate access for anglers at the tailrace, which is a popular fishing location for both resident and diadromous species at many other hydropower facilities including comparable facilities nearby. As such, MDIFW requests that MDEP require an interagency evaluation and consultation regarding the Licensee providing access to the tailrace in closer vicinity to the dam than is currently provided at the Durham Boat Launch located almost seven miles downstream. If the results of this interagency evaluation and consultation identify a feasible angling access opportunity to the tailrace, MDIFW would recommend that MDEP require its implementation.

While MDIFW recognizes that trailered access may be unrealistic in downtown Lewiston/Auburn, it is our position that a more modest and limited tailrace access option is appropriate for this facility. MDIFW remains willing and able to work collaboratively with interested parties to establish tailrace access, and, if established, MDIFW may be able to provide fish stockings at this location in the future.

In conclusion, MDIFW respectfully requests that MDEP consider these comments in its review for the final Water Quality Certification.