

State of Maine  
Department of Environmental Protection  
17 State House Station  
Augusta, Maine 04333

April 11, 2024

*Comments on draft Department Order of March 14, 2024: Water Quality Certificate for the Green Lake Water Power Company.*

Commissioner Loysim,

As a resident of Hancock County, a landowner in the Union River watershed, hunter, fisherman, and Maine guide I'd like to commend the Department on its recommendations to protect the water quality and aquatic life of Green Lake, Reeds Brook, and the greater Union River watershed through its draft Water Quality Certification (WQC) for the continued operation of the Green Lake Water Power Company (issued by the Department March 14, 2024).

Your commitment to providing safe, timely, and effective fish passage into and out of Green Lake is essential to restoring diadromous fish runs throughout the Union River Watershed and the Gulf of Maine. I agree strongly with the draft's language that "*indigenous aquatic species native to Green Lake and Reeds Brook include diadromous fish*" (12, WQC) and that "*diadromous fish are part of the biological community in the river and, due to their migratory nature and life cycle needs, must be able to pass the Green Lake Dam to spawn*" (18, WQC). To this second point, I would add that other portions of diadromous fish species' life histories—feeding, thermal refugia—depend on access to Green Lake and its tributaries. These species also benefit the nonmigratory species of Green Lake by providing forage and essential marine-derived nutrients.

I also ask the Department to reconsider the timeline for the required fish passage improvements as listed in Section 3F of "The Following Conditions" (beginning at 35 WQC). As proposed, this condition's timing is tied to operational changes or dam removal downstream of the Green Lake project at the so-called "Ellsworth Project". Linking fish passage for the full cohort of diadromous species to passage improvements downstream makes sense for species like sea lamprey and shad, as well as the potential populations of fully restored Atlantic salmon and river herring (Alewife and blueback) species, but when we consider that over 300,000 river herring and a small number of Atlantic salmon are already annually passed upstream of Graham Lake dam ([www.maine.gov/dmr/sites/maine.gov/dmr/files/inline-files/Trap%20Count%20Archive%202022.pdf](http://www.maine.gov/dmr/sites/maine.gov/dmr/files/inline-files/Trap%20Count%20Archive%202022.pdf)) I believe the Department should require immediate fish passage improvements for river herring and federally endangered Atlantic salmon while future passage upgrades or dam removals downstream are considered.

Thank you for this well-crafted order and your work to protect Maine's rivers and environment.

Brett Ciccotelli  
Hancock, Maine