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April 12, 2024

Ms. Melanie Loyzim, Commissioner
State of Maine
Department of Environmental Protection
DEP-Hydropower@maine.gov

RE: Green Lake WQC, March 14, 2024
DEP Application #L-020024-33-D-N
Project Name: Green Lake Hydroelectric Project
FERC Project No. 7189

Dear Ms. Loyzim:

The following are my family's comments on the Draft Water Quality Certificate (WQC) issued March 14, 2024. My father has lived on Green Lake since 2014 and my family enjoys spending summer vacation time on the lake's beautifully clean, clear water, and thriving natural habitat since that time. Having grown up in Hampden, Maine, but living now outside of Philadelphia, our time on the lake is an important homecoming each year, and gives my children a taste of what it means to be from Maine. It is a great relief to see, in The MDEP Conclusions contained in the WQC (Paragraph Number 6.) that the GLWPCo operation of the project on Green Lake "will result in all waters affected by the project being suitable for all designated uses and meeting all other applicable water quality standards:"

I have become familiar with other families in the Green Lake community, and appreciate the pride they take in the quality of the water. I have even joined the core group to search for invasive plants, when it aligns with my time there, which we hope assists the MDEP invasive plant removal team's efforts.

We are disappointed in the proposed addition of conditions to the WQC 3F-H that require construction of upstream fish passage facilities based on activities at the Ellsworth Project, because we are concerned that there are potential threats to the native population of arctic charr and landlocked salmon and many other species that thrive in the cold, deep water of Green Lake. Those potential impacts must be studied first, particularly with respect to the introduction of invasive species that would almost certainly upset the delicate ecosystem. And the costs of such a facility will create significant hardship for Green Lake Water Power Company's (GLWP) facility on Green Lake and Reeds Brook. GLWP has held a FERC license for 40 years and has proven themselves to be a great neighbor, keeping Green Lake a valuable asset to Dedham and Ellsworth and thousands of recreational users.

We would also like to see reference to lake drawdown dates removed from the WQC. It is very possible that, due to the spawning habits of arctic charr, the existing conditions of the FERC License related to drawdown dates could be modified. MDIFW is being contacted to discuss a more relaxed set of drawdown dates that make Green Lake more available in the fall and providing recreational lake levels and no impact on the spawning beds of the native arctic charr.

The WQC should not impose conditions which will have significant negative impacts on the Green Lake ecosystem, GLWP, the tax basis of Dedham and Ellsworth and the recreational benefits of Green Lake in general. Hydroelectric power generation is an important renewable resource and GLWP should continue to operate its project. The conditions added to the WQC, as written today, are unacceptable to those of us who want to see Green Lake continue to thrive ecologically and economically. We appreciate your attention to this very important issue.

Sincerely,
Darin and Kristen Jellison