

Dale & Barbara Jellison  
803 Green Lake Rd  
Dedham, Maine 04429  
April 10, 2024

Ms. Melanie Loyzim, Commissioner  
State of Maine  
Department of Environmental Protection  
[DEP-Hydropower@maine.gov](mailto: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:

I am respectfully submitting comments on the Draft Water Quality Certificate (WQC) issued March 14, 2024 on behalf of my wife, Barbara, and myself. We are blessed to be living on Green Lake since 2014 and have thoroughly enjoyed the pristine waters, recreational opportunities, diverse wildlife and fishing opportunities. My family, including my grandchildren, also take advantage of the enjoyment the lake provides.

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:"

The Green Lake community takes pride in the quality of the water in Green Lake and we have a very active group of volunteers reporting water quality data and patrolling for invasive plants. Also we understand that the MDEP has an invasive plant removal team that has recently and successfully removed invasive vegetation from nearby lakes. For that we thank you.

Having said all of this we are opposed to adding conditions to the WQC, 3F-H, that require construction of upstream fish passage facilities based on activities at the Ellsworth Project.

As you are well aware Green Lake is a unique cold water lake with a native population of arctic charr and landlocked salmon and many other species that thrive in a cold, deep water lake. We do not feel it is appropriate to mandate fish passage without first determining the impacts will have on Green Lake. Upstream fish passage could introduce invasive species and upset the delicate ecosystem of Green Lake. Additionally, the cost, both construction as well as maintenance, would render the existing Green Lake Water Power Company's (GLWP) facility on Green Lake and Reeds Brook uneconomical. GLWP has been in existence with their FERC license for 40 years and has proven themselves to be a great neighbor and has excelled in keeping Green Lake a valuable asset to both Dedham and Ellsworth as well as the thousands of recreational users.

An additional issue relates to the statements in the WQC concerning the lake drawdown dates. 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. Lake drawdown dates do not need to be related to or referenced in the WQC.

In conclusion, 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 will likely kill the GLWP project as well as Green Lake as we know it today.

Thank you for your time and consideration.

Sincerely,

Dale & Barbara Jellison