



Maine Department of Environmental Protection

2018 Water Quality Re-classification Initiative

Summary of Public Comments to the Board of Environmental Protection, and MDEP Responses

COMMENTS RECEIVED ON UPGRADE PROPOSALS

All Upgrade Proposals

Statewide, recommend revising 38 M.R.S. Sections 467 and 468. Proposed by various entities.

General expression of support: John Burrows, Atlantic Salmon Federation (ASF) and Maine Council of the ASF, Brunswick; Jean Berman, citizen, Peaks Island; Ben Boudreau, citizen; Chloe Chunn, citizen, Swanville; David Cloutier, citizen, South Portland; Peter Crockett, citizen, Argyle TWP; Representative Robert Duchesne, Maine Legislature, Hudson; David Kaufman, Energy Solutions, Waldoboro; Jordan Emerson, citizen; Allison Fleck, citizen, Castine; Ann Gass, citizen, Gray; Isaiah Gillis, citizen; Mary Goldsmith, citizen; Scott Guzman, citizen, Acton; Cynthia Handlen, citizen, Portland; Lesley M. Jones, citizen, Portland; Marissa Keminidi, citizen Susan Lauchlan, citizen, Waldo; Rachel Lyn, citizen; Emily MacGibeny, citizen, Belfast; Landis Hudson, Maine Rivers, Yarmouth; Alan Plummer, citizen; Elizabeth Rodriguez, citizen; Matt Scott, citizen, Belgrade; Gopi Donale Shelton, citizen; Kathleen Skilling, citizen; Karin Spitfire, citizen, Belfast; Greg Ponte, Trout Unlimited, Kennebec Valley chapter, West Gardiner; Paula Urbach, citizen; David Wessels, citizen, Knox; Eileen Wolper, citizen, Belfast.

Paraphrased comments in support: 185 citizens who signed a form letter of the Natural Resources Council of Maine (NRCM); see Appendix Table 1 for list of names.

1. DEP has proposed to upgrade more than 400 miles of rivers and streams (including tributaries to Webb Lake; Wesserunsett Stream and tributaries; West Branch Mattawamkeag River; Fish Stream). All of these water bodies are outstanding resources for Maine people and deserve increased protection.
2. Penobscot River Watershed:
 - a. Upgrading the Penobscot River main stem from Medway to Mattawamkeag, the West Branch Penobscot River from the Millinocket area to Medway, and the lower part of Millinocket Stream to Class B is especially noteworthy and long overdue as these water bodies meet Class B standards and have for many years.
 - b. MDEP modeling shows that substantial new industry could locate in Millinocket, discharge reasonable amounts of appropriately treated waste, and still meet Class B standards.
 - c. Class B strikes a balance that would allow industry that is respectful of the river while still protecting it for the large numbers of people living downstream and the newly expanding populations of sea-run fish travelling upstream.
3. The Legislature deserves the opportunity to discuss these upgrades; we urge the BEP to pass the upgrades on to the Legislature as proposed.

Paraphrased comments in support: 34 citizens who signed the NRCM form letter but altered portions of it; see Appendix Table 2 for list of names.

1. Comments as noted above.
2. Maine contains the most extensive wild lands in all of the eastern part of our country. Besides the great people of our State, our unspoiled natural places are among our greatest assets. Clean lakes, rivers and streams contribute to the health of the entire environment and its inhabitants, including us. The importance of protecting water quality for future generations cannot be overemphasized.
3. Clean water is one of the basic requirements for life. In Maine we have worked hard to restore and preserve our rivers and streams, returning them to their more natural state where they have been industrialized and polluted, and keeping them wild and healthy where they have been able to thrive. For example, on the Penobscot River many stakeholders came to the table for a common cause, which has proved to be a success, bringing wildlife, fisheries and water quality back to healthy levels, and citizens back to recreation on the water. This story, carried nationwide, has made Maine an example of what can be accomplished. Supporting the proposed upgrades is timely and prudent, and will help strengthen the protections they need in this time of climatic upheaval and resource extraction pressure.
4. We have paddled and fished many Maine rivers for a long time, including some of the rivers proposed for upgrades. We know their recreational, restorative and scenic value first hand and consider this a rare opportunity to significantly increase the recreational paddling and fishing opportunities.
5. As small business owners relying on tourism, we are acutely aware of how important it is to protect the beauty and health of our waters and environment. Our clean lakes, rivers and streams bring many sportsmen to Maine (fishers, kayakers, canoers, and others who enjoy being on the water) and upgrading these waterbodies is beneficial to everyone and will help sustain and increase the tourism industry, including a guiding tradition that is unique to Maine.
6. I am a 79-year old, lifelong resident of Maine and dearly love our still open, clean sort of wild state. I have seen and smelled the effects of pollution created by careless disposal of industrial, municipal, residential and agricultural waste and observed the loss of habitat for fish and wild life caused by industrial development. Jobs are hard to find in this state and the loss of the paper industry is hard on many but the gains that have been made to our environment over the more recent years are encouraging. Letting the "big money" interests treat our state as a "third world nation to be exploited" may sound great to someone looking for a job but the low wages paid and the loss of our natural resources hardly justify any such spoilage of our real wealth. It's a complicated world and we need to value and keep our "green quality" and never turn back to the waste and spoilage of prior years.
7. As residents and visitors, business owners and nature lovers, fishers, other water-enthusiasts and conservationists, we are excited and hopeful about this opportunity to further the protection of the rivers and streams in this beautiful state. We urge the Board of Environmental Protection to forward MDEP's upgrade proposals to the Legislature. It is time for action. Thank you very much for caring about Maine's future health and economy, and for acting in Maine's best interests.

ANDROSCOGGIN RIVER BASIN

Tributaries to Webb Lake/Webb River

Tributaries to Webb Lake/Webb River in Weld and surrounding towns; upgrade from Class B to Class A (approx. 200 miles). Proposed by MDEP.

Recommend revising 38 M.R.S. Section 467(1)(D) as follows:

- D. Androscoggin River, minor tributaries - Class B unless otherwise specified.
(9) Tributaries to Webb Lake – Class A

Paraphrased comments in support: Nick Bennett, Natural Resources Council of Maine, Augusta; Benjamin Hout, Selectman, Town of Weld.

1. The tributaries to Webb Lake are largely on public land in the Tumbledown Mountain watershed. Tumbledown may be the most hiked mountain in Maine and it receives very heavy use from hikers. The area also receives very heavy use from hunters and fishermen and these tributaries are first class brook trout streams. They are largely forested, with no discharges, so an upgrade is warranted.
2. The lake is the ecological heart of our area, and the economic engine of the Town of Weld. Its preservation is the perfect melding of ecological and economic concerns. I applaud your consideration of the tributaries that feed the lake, especially as sawdust, erosion, and other human activities are dramatically affecting the lake bottom and the lake as a whole.

No comments in opposition.

KENNEBEC RIVER BASIN

East Branch Wesserunsett Stream and Tributaries

East Branch Wesserunsett Stream above the downstream Rt. 150 crossing (Harmony Road), and all tributaries in Mayfield TWP, Brighton Plantation and Athens; upgrade from Class B to Class A (approx. 44 miles). Proposed by MDEP.

Recommend revising § 467(4)(I) as follows:

- I. Kennebec River, minor tributaries - Class B unless otherwise specified.
(6) East Branch Wesserunsett Stream above the downstream Rt. 150 (Harmony Road) crossing in Athens – Class A.
(7) Tributaries to East Branch Wesserunsett Stream – Class A.

No comments in support or in opposition

Paraphrased general comment: Paul Porada, Woodard & Curran, Portland.

1. The description of the reclassification for the main stem East Branch Wesserunsett Stream is not sufficiently clear and could possibly lead to confusion. The description 'East Branch Wesserunsett Stream above the downstream Rt. 150 crossing' is unclear if

there is ambiguity about where the East and West Branch combine to form a main stem. The ambiguity can be removed by replacing “above the downstream Rt. 150 crossing” with “above the downstream Harmony Road crossing in Athens”.

MDEP response

To ensure absolute clarity about the extent of the main stem upgrade, the description has been expanded to ‘...above the downstream Rt. 150 (Harmony Road) crossing...’.

PENOBSCOT RIVER BASIN

Upper Penobscot River Watershed

Upper main stem Penobscot River, West Branch Penobscot River, Millinocket Stream

General comments in support: Joanne Boynton, citizen, Belfast; Andrew Cadot, citizen, Portland; Natalie Charles, citizen, Belfast; Senator Geoff Gratwick, Bangor; Dennis King, citizen, Freeport; Bill Kreamer, citizen, Belfast; Susan Lauchlan, citizen, Waldo; Barbara Moore, Penobscot Nation, Indian Island; Angie Reed, citizen, Linneus; Bucky Owen, citizen, Orono; Michael Maybury, Penobscot River and Bay Institute/Penobscot Riverkeepers; Catherine Schmitt, citizen, Bangor; David Thanhauser, Penobscot River Paddling Trail, Swanville.

Paraphrased comments in support: Susan Dickson-Smith, citizen, Gouldsboro; Stephen Miller, Islesboro Island Land Trust, Islesboro; Janet Anderson, Archibald Gillies, Hanna Kerr, Sandra Oliver, Gabriel Pendleton, Phil Seymour, Town of Islesboro; Nick Bennett, Natural Resources Council of Maine, Augusta; Laurie Osher, Town of Orono; Dan Kusnierz, Kirk Francis and Maulian Dana, Penobscot Nation, Indian Island; Judith Simpson, citizen, Belfast.

1. Maine’s Water Quality Resource Management law was enacted because of great public interest and concern in the State in promoting the general welfare, in preventing disease, in promoting health, in providing habitat for fish, shellfish and wildlife, as a source of recreational opportunity and as a resource for commerce and industry. Title 38 M.R.S. Section 464 declares that it is the State's objective to restore and maintain the chemical, physical and biological integrity of the State's waters and to preserve certain pristine state waters. Section 464 also states when the actual quality of any classified water exceeds the minimum standards of the next highest classification that higher water quality must be maintained and protected. The Board shall recommend to the Legislature that that water be reclassified in the next higher class. This reclassification process is long overdue. The Clean Water Act requires that states and tribes review their water quality standards every three years. The last time that Maine conducted a comprehensive reclassification review was in 2008.
2. Penobscot Nation
 - a. Most of the Penobscot River basin proposals were submitted by the Penobscot Nation to MDEP during its solicitation process in 2017. They are based on the results of extensive water quality monitoring (for dissolved oxygen, temperature, bacteria, and aquatic insects) conducted by the Penobscot Nation Water Resources Program over many years at many locations and during a wide variety of conditions, including during the time when the East Millinocket Great Northern mill was operational. Aquatic insect monitoring shows that Class B aquatic life criteria were met downstream of the mills in Millinocket and East Millinocket as far back as 1995 when both mills were operating. Our data for the lower West Branch and upper main

- stem Penobscot River clearly demonstrate that these segments have been meeting Class B criteria for at least the past 10 years; thus these segments meet the requirements under 38 M.R.S. Section 464 and they should be recommended to the Legislature for upgrade.
- b. The recovery of Penobscot River over the past 10 to 15 years is remarkable. Areas of the river that once smelled bad, had sheets of foam, and were so dark that you could not see the bottom are now clean and clear. Blooms of algae or cyanobacteria that extended all the way from Dolby Pond to the coast are no longer present. Through huge investments in money and efforts, barriers to fish migration have been removed and numerous species of native sea run fish are now returning to their historical spawning areas and restoring the aquatic ecosystems.
 - c. As a riverine people, the Penobscot Tribe depends upon the resources of the Penobscot River for food, medicine, ceremonies and it is a huge part of our cultural identity and survival as a people. We have an inherent and sovereign right to sustenance fishing in the river and many of our citizens hunt the island and gather natural materials and medicines on the lands and waters. We also have entrepreneurs and business owners who guide and utilize the territory in responsible and harmonious ways. The river is simply the life blood of the Tribe and the health of the Penobscot people is critically dependent on the health of the Penobscot River. It is our responsibility to look after and care for it so it can take care of us. We take this responsibility very seriously and have developed and invested in our natural resource programs to carry out this work. Historically, industry and others have not been so respectful to the river and their use of it. Dams have blocked passage of fish to carry out their life cycles, log drives have littered the bottom of the river with logs, water pollution from discharges have caused much damage to the water quality of the river and prevented us from eating fish for sustenance purpose, which we have depended on for thousands of years.
 - d. We understand and are sensitive to the need for economic development in communities here in Maine. We too have our own challenges in regards to jobs. However, we believe that economic development should not be done at the expense of degrading our environment and there needs to be a balance. Instead, we should recognize the importance and tremendous value of clean water and what it has to offer not only the Penobscot Tribe, but all people in Maine. A healthy river that supports the fish, wildlife and ecosystem is good for our economy. These proposed upgrades still would allow for new economic and industrial development at a level that is respectful to the river.
3. Other commenters
 - a. Maine's Water Quality Resource Management law is especially important to Islesboro and the region around it. What comes down the Penobscot River affects Islesboro and thus improvements in water quality represent improvements in the quality of the water around the island. Clean water forms the lifeblood of town economy and many businesses and private parties depend on the actual and perceived sparkling aquatic environment that encircles our archipelago. The Town of Islesboro Select Board consistently supports efforts to improve and protect water quality in the watershed, and voted unanimously to request that the BEP support these proposals and recommend them to the Legislature.
 - b. MDEP has a special responsibility to protect the Penobscot River, because the nation that bears its name has been poisoned over the years by industrial pollution in the river they consider sacred. The river should be able to provide them with a subsistence fishery. The Penobscot Nation has been such good stewards to the

river, keeping the waters clear, safe and beautiful based upon their wisdom of health and beauty, and doing outstanding water quality science to try to maintain the health of their river. It is our responsibility, as a state, to support them in their efforts to restore their river to a state of health.

- c. Class B is not a no-discharge classification. The lower West Branch Penobscot River and the upper main stem have been meeting Class B standards for many years, even while the mills in Millinocket and East Millinocket were discharging. It is time for the classifications in law to reflect the classifications in reality. MDEP modeling results show that a discharge of around 4,000 pound per day of biochemical oxygen demand (BOD) from the Millinocket area to the river is possible and not preclude Class B standards downstream. 4,000 pounds of BOD allows for a big discharge, although not as big as the discharges from the local mills as they were in the 1950s. For comparison, the Verso Jay mill is a big facility with a significant discharge and during the last three years it never discharged more than 3,000 pounds per day of BOD. MDEP estimates that a BOD discharge of 4,000 pounds per day in the Millinocket area is compatible with Class B standards. That is a big discharge, and NRCM does not anticipate that the types of industries coming into that area are going to have anything like that discharge.
4. The Board does not have the final say on water quality standards and water quality classifications, the Legislature does and that is the right place for those decisions to be made. These proposals deserve a hearing before the Legislature and we respectfully ask that the Board recommend them to the Legislature.

Upper Main Stem Penobscot River

Confluence of East and West Branches to confluence with Mattawamkeag River, including all impoundments; Medway, Molunkus TWP, Woodville, and Mattawamkeag; upgrade from Class C to Class B (approx. 13 miles). Proposed by Penobscot Nation and The Nature Conservancy.

Recommend revising § 467(7)(A)(1) as follows:

A. Penobscot River, main stem.

(1) From the confluence of the East Branch and the West Branch to the confluence of the Mattawamkeag River, including all impoundments - Class ~~C~~B.

General comment in support: Paul Sheridan, citizen, Northport.

Paraphrased comments in support: John Burrows, Atlantic Salmon Federation (ASF) and Maine Council of the ASF (MC-ASF), Brunswick; Landis Hudson, Maine Rivers, Yarmouth.

1. As long-time advocates and proponents for restoring sea-run fisheries to the Penobscot River, ASF/MC-ASF are particularly pleased to see a number of proposed upgrades in the upper portions of the Penobscot watershed, including the mainstem Penobscot from Medway to Mattawamkeag. These upgrades are warranted and long overdue.
2. Maine Rivers in particular endorses this proposal, which is warranted by the evidence collected by the Department. Class B would still leave room for ecologically sound economic development.

Paraphrased comments in opposition: John Davis, Town of Millinocket – see ‘Paraphrased comments in opposition’ under ‘West Branch Penobscot River and Millinocket Stream’, below.

MDEP response

See ‘MDEP response’ under ‘West Branch Penobscot River and Millinocket Stream’, below.

West Branch Penobscot River – Back Channel Reach

West Branch Penobscot River from the outlet of Quakish/Ferguson Lakes to its confluence with the East Branch Penobscot River, Millinocket, T3 Indian Purchase TWP, and Medway; upgrade from Class C to Class B (approx. 14.3 miles). Proposed by Penobscot Nation (PN).

Recommend revising § 467(7)(C)(1)(f) as follows:

- (1) West Branch of the Penobscot River, main stem.
 - (f) From the outlet of Ferguson and Quakish Lakes to its confluence with the East Branch of the Penobscot River, including all impoundments - Class ~~C~~B.

Paraphrased comment in opposition: Kelly Maloney, Brookfield Renewable, Lewiston.

1. We are providing MDEP with our analysis for generation and annual revenue impacts associated with the proposal to increase Back Channel flows by 50 cfs (cubic feet per second), 300 cfs, 350 cfs, and 15% of station flow. Annual impacts amount to \$132,000, \$800,000 and \$932,000, and \$1,912,000, respectively.
2. Our analysis accounts for the impending conversion of three Millinocket Hydro 40 Hz generator units to 60 Hz units. Our analysis is based on the long term average generation, converted to flow given that North Twin is a storage facility that provides flow to Millinocket Hydro. The capacity of North Twin is 4,100 cfs and Millinocket Hydro will be 4,600 cfs following the conversion so all flow from North Twin up to its maximum capacity is used entirely by Millinocket Hydro and any flows diverted to the Back Channel would have a direct impact to generation, particularly since long term average monthly flows typically do not exceed the station capacities. Any effect to the reserve and capacity markets and to ancillary services would be negligible.
3. We understand that MDEP used StreamStats for monthly flows to determine that the watershed should be able to produce enough water to meet power generation needs at 2,000 cfs and aquatic habitat needs at 300 cfs in the West Branch. Our analysis is based on actual long term averages, and as stated above our capacities are much greater than 2,000 cfs at both facilities.
4. As previously stated, given MDEP’s waiver of certification of this reach given existing hydrologic conditions, the proposal would not technically represent an upgrade from Class C to B.

MDEP response

The Department acknowledges the comments and has reconsidered the previously recommended upgrade for the West Branch Penobscot River Back Channel reach (i.e. outlet of Quakish/Ferguson Lakes to confluence with Millinocket Stream). The Back Channel reach is the only portion of the prior proposal that does not presently meet its current Class C classification due to low water flow issues created by operations at the Millinocket Hydro facility, which has also resulted in a general lack of meaningful data available for Department analysis

of the Back Channel. This situation will need to be addressed during the Millinocket Hydro facility's water quality recertification process, which is expected to occur in 2024 in connection with federal relicensing of that facility. The Department recommends deferring consideration of any re-classification proposal for the West Branch Penobscot River Back Channel reach until after recertification and relicensing of the Millinocket Hydro facility are complete. Accordingly, the Department has removed the Back Channel reach from the revised recommendations. With this removal, the revised upgrade recommendations for the lower West Branch Penobscot River are now as follows:

- (1) West Branch of the Penobscot River, main stem.
 - (f) From the outlet of Ferguson and Quakish Lakes to its confluence with ~~the~~ Millinocket Stream - Class C.
 - (g) From the confluence with Millinocket Stream to its confluence with the East Branch of the Penobscot River, including all impoundments - Class B.

The fact that the Department may have waived water quality certification in 1993 for the West Branch Penobscot River Back Channel reach during the Millinocket Hydro facility's last federal license renewal process does not mean that it will waive certification again in 2024. Any claim of waiver of State water quality certification with respect to that prior relicensing process did not and cannot affect the statutory status of the Back Channel reach as part of the West Branch Penobscot River, which currently remains classified as Class C under 38 M.R.S. § 467(7)(C)(1)(f). Per 38 M.R.S. § 464(2)(D), the Maine Legislature has the sole authority to make any such classification changes, which were not implicitly changed through any prior State water quality certification process by the Department.

West Branch Penobscot River and Millinocket Stream West Branch Penobscot River

West Branch Penobscot River from the outlet of Quakish/Ferguson Lakes to its confluence with the East Branch Penobscot River, Millinocket, T3 Indian Purchase TWP, and Medway; upgrade from Class C to Class B (approx. 14.3 miles). Proposed by Penobscot Nation.

As noted in the preceding item, the Department is amending the extent of the West Branch Penobscot River segment proposed for upgrade to this sub-section:

West Branch Penobscot River from the confluence with Millinocket Stream to its confluence with the East Branch Penobscot River, Millinocket, T3 Indian Purchase TWP, and Medway; upgrade from Class C to Class B (approx. 9.3 miles). Proposed by Penobscot Nation and amended by MDEP.

Recommend revising § 467(7)(C)(1)(f) as follows:

- (1) West Branch of the Penobscot River, main stem.
 - (f) From the outlet of Ferguson and Quakish Lakes to its confluence with ~~the East Branch of the Penobscot River, including all impoundments~~ Millinocket Stream - Class C.
 - (g) From the confluence with Millinocket Stream to its confluence with the East Branch of the Penobscot River, including all impoundments - Class B.

Millinocket Stream

Confluence with West Branch Canal to confluence with West Branch Penobscot River, Millinocket; upgrade from Class C to Class B (approx. 2.4 miles). Proposed by MDEP.

Recommend revising § 467(7)(C)(2)(d) as follows:

- (2) West Branch of the Penobscot River, tributaries - Class A unless otherwise specified.
- (d) Millinocket Stream from the confluence of the West Branch Canal to its confluence with the West Branch of the Penobscot River - Class GB.

General expression of support: Algirdas Nakas, citizen, Millinocket; Marissa Keminidi, citizen.

Paraphrased comments in support: John Burrows, Atlantic Salmon Federation (ASF) and Maine Council of the ASF (MC-ASF), Brunswick; Landis Hudson, Maine Rivers, Yarmouth; Barbara Moore, Penobscot Nation, Indian Island.

1. As long-time advocates and proponents for restoring sea-run fisheries to the Penobscot River, ASF/MC-ASF are particularly pleased to see a number of proposed upgrades in the upper portions of the Penobscot watershed, including the West Branch from Millinocket to Medway and the lower reach of Millinocket Stream. These upgrades are warranted and long overdue.
2. Maine Rivers in particular endorses the West Branch proposal, which is warranted by the evidence collected by the Department. Class B would still leave room for ecologically sound economic development
3. I am in favor of upgrading all waterbodies and especially those which are more northern, which empty into all of the other lower bodies. Excluding one particular area, especially because it is at the northern part that empties into all of the others would not make any sense to me.

Paraphrased comments in opposition: Michael J. Murphy, Katahdin Motors, Millinocket; Steve Sanders, Our Katahdin, Millinocket; John Davis and Michael Madore, Town of Millinocket.

1. We oppose the Board's proposal to change the water quality classification in our region. We have lost half our population and our unemployment rate is one of the highest in the state. We feel that the proposed re-classification would have an adverse effect on Our Katahdin, development of our mill site, our community and Penobscot County as a whole, while ignoring the economic needs of this entire region. The dampening effect of the uncertainty created by the current re-classification proposal creates uncertainty for serious prospects, and precludes countless other potential prospects from even considering Millinocket as a site location.
2. Katahdin Motors regards the re-classification proposal as a thinly veiled attempt at discouraging prospective tenants of the "Our Katahdin" industrial park. We take pride in the health of the river as it is, and do not want or need a change in the classification of Millinocket Stream. The best thing for this region and state is to leave the classification alone. Any uncertainty coming from bureaucratic wrangling is like a giant iron hand clasp upon the mouths and nostrils of our economy.
3. Since closure of the mill in 2008, substantial efforts have commenced to locate industry on the former mill site, and recently a public/private partnership comprised of the Town and Our Katahdin took on the task of moving the region's economy forward. Our attempts are coordinated and comprehensive seeking to place suitable industries of a

diverse nature to rebalance and energize the region's economy. While the tourism economy has made excellent strides it cannot be the sole cornerstone of our new economy.

4. When Our Katahdin purchased the company GNP West, it assumed ownership of existing liabilities and assets. One asset is an active wastewater discharge license with an application for renewal in accordance with Class C standards. This permit is of interest to several of the 54 businesses that are interested in our development. We firmly believe that we can redevelop the mill site with modern industries that do not discharge in the same manner as the former pulp and paper mills. However, several interested industries represent emerging technologies that do not have permitted facilities anywhere in the world, so the discharge requirements are unknown. We do not want to be hampered by having restrictions placed on something that has not developed yet.
5. The numeric criteria for bacteria would decrease under Class B and make it more difficult for our wastewater treatment plant to meet water quality standards. We will then need to find money to upgrade the facility in the absence of a tax base that could undertake such an endeavor.
6. While we do support examining the potential for water reclassification at the recommended intervals, we are asking for a delay in the reclassification of Millinocket Stream until we have started developing the former mill site. We hope that within three years we have more clarity on discharge requirements of the industries located at the site. Once businesses are in place and Class B standards are met, it may be prudent to change the classification from Class C to Class B.

MDEP response

The commenters raise various concerns regarding how upgrades may affect future development efforts in the Millinocket region. However, both the monitoring data and modeling results that the Department considered in evaluating these proposals indicate that Class B water quality standards are currently being attained. In the West Branch Penobscot River, Class B standards have been attained for at least the past 10 years. The commenters generally do not make any arguments or submit any evidence calling into question the Department's attainment findings for these segments. Under a provision of Maine's statutory antidegradation policy (38 M.R.S. § 464(4)(F)(4))¹, "(w)hen the actual quality of any classified water exceeds the minimum standards of the next highest classification, that higher water quality must be maintained and protected. The board shall recommend to the Legislature that that water be reclassified in the next higher classification." Given this statutory directive, and in light of the lack of evidence and arguments calling into question the Department's attainment findings, the Department believes that it must recommend to the Legislature that it make these proposed classification upgrades to the West Branch Penobscot River (as revised, without the Back Channel reach) and to Millinocket Stream. Because monitoring data and modeling results considered by the Department also show that Class B standards have similarly been attained for at least the past 10 years in the upper main stem Penobscot River (from the confluence of the East and West Branches to the confluence with Mattawamkeag River), the Department is also recommending an upgrade for that segment from Class C to Class B.

The Department's modeling shows that new discharges at the actual levels discharged at the former mill site between 2005 and 2009 would not prevent attainment of upgraded Class B

¹ The federal Clean Water Act has a corresponding provision in 40 C.F.R. § 131.12(a)(2).
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standards in these segments, and the Department expects that any modern development would be able to obtain a discharge license for that segment under Class B standards.

In terms of the effect of an upgrade on the Millinocket wastewater treatment facility (WWTF), which discharges to the West Branch Penobscot River, discharge licenses use *Escherichia coli* geometric mean criteria for monthly average bacteria limits. The Class B *E. coli* geometric mean criterion is 64 CFU/100 ml while the Class C criterion is 100 CFU/100 ml (Table 1)². Between May 2015 and September 2018, the monthly average bacteria values for the Millinocket WWTF ranged from 1 to 34 CFU/100 ml, and were thus significantly below the Class B limit of 64 CFU/100 ml. It is noted that the Class B limit of 64 CFU/100 ml is routinely met by numerous treatment facilities across the state using a disinfection process similar to the Millinocket WWTF.

Daily maximum permit limits are typically 427 CFU/100 ml for Class B and 949 CFU/100 ml for Class C, but these limits assume and are dependent on the levels of dilution at the point of discharge, as reflected in Table 1 below. During the same timeframe as noted above, daily maximum values ranged from 2 to 816 CFU/100 ml, with three records exceeding the typical Class B limit of 427 CFU/100 ml. However, because of the relatively large dilution (617:1) at the point of discharge for the Millinocket WWTF, and in consideration of the re-classification upgrade, the Department expects to be able to carry the current Millinocket WWTF daily permit maximum of 949 CFU/100 ml forward in the next license renewal (in 2021) and still meet all Class B standards, thus eliminating concerns about the impact of an upgrade on the facility.

Both Class B and C bacteria criteria have the same seasonality as well as duration and frequency components.

Table 1: Bacteria (*E. coli*) permit limits and Millinocket WWTF records; values are given in CFU/100 ml.

| | Monthly average | Facility range (5/15 - 9/18) | Daily maximum | Facility range (5/15 - 9/18) |
|---------|-----------------|------------------------------|---------------------------|------------------------------|
| Class B | 64 | 1 - 34 | 427 (if dilution >1.1) | 2 - 816 |
| Class C | 100 | | 949 (if dilution >6.5) | |

West Branch Mattawamkeag River

From Interstate 95 to confluence with Mattawamkeag Lake, Island Falls; upgrade from Class B to Class A (approx. 9.2 miles). Proposed by MDEP.

Recommend revising 467(7)(D)(2)(b) as follows:

2) Mattawamkeag River, tributaries - Class A unless otherwise specified.

~~(b) West Branch Mattawamkeag River from Interstate 95 to its confluence with Mattawamkeag Lake - Class B.~~

² The Class C criterion of 100 CFU/100 ml became law on August 1, 2018. Previously the Class C criterion was 126 CFU/100 ml. Permit limits are being adjusted upon renewal to reflect this change.

Paraphrased comment in support: John Burrows, Atlantic Salmon Federation (ASF) and Maine Council of the ASF, Brunswick.

1. As long-time advocates and proponents for restoring sea-run fisheries to the Penobscot River, we are particularly pleased to see a number of proposed upgrades in the Penobscot watershed, including a significant portion of the West Branch Mattawamkeag River near Island Falls. These upgrades are warranted and long overdue.

Paraphrased comments in opposition: Jutta Beyer, Laura Farnsworth, Darrel Hartin, Clarissa Porter, and Frank Porter, Town of Island Falls.

1. We are deeply concerned that an upgrade to Class A can only be counter to our economic development efforts in attracting new business to our area and along this stream.
2. The Town has many questions: Will re-classification impact development along the riverfront? What businesses could move into the buildings of the old factory? Will re-classification affect buildings on the edge of the river through shoreline zoning? Will we need to eliminate septic systems and build a wastewater treatment plant? Is road runoff into the river a problem? Can we build a river walk? Will Town policies be affected? Will re-classification affect land valuations?

MDEP response

The commenters raise various concerns regarding how an upgrade to Class A may affect future development efforts in the Island Falls area.³ While the Department is unaware of any pending discharge license applications or current development efforts in the immediate area, any new development or re-development of an existing site might be affected if it required a license for a discharge to the West Branch Mattawamkeag River because Class A standards are stricter than Class B standards. However, the monitoring data that the Department considered in evaluating this proposed upgrade indicates that Class A water quality standards are currently being attained in this segment, and the commenters generally do not make any arguments or submit any evidence calling into question the Department's attainment finding. Under a provision of Maine's statutory antidegradation policy (38 M.R.S. § 464(4)(F)(4)), "(w)hen the actual quality of any classified water exceeds the minimum standards of the next highest classification, that higher water quality must be maintained and protected. The board shall recommend to the Legislature that that water be reclassified in the next higher classification." Given this statutory directive, and in light of the lack of evidence and arguments calling into question the Department's attainment finding for this segment, the Department believes that it must recommend to the Legislature that it make this proposed upgrade to Class A.

Shoreland zoning is independent of water classification. Based on the Department's general understanding of the conditions in the Town of Island Falls, it does not believe that the recommended upgrade will require the construction of a new wastewater treatment plant. The Department is unable to respond to hypothetical questions and scenarios regarding other potential effects of the recommended upgrade, which would depend on the Department's consideration of actual and specific facts and circumstances.

³ Following up on a recommendation by Board Chairman Parker at the 9/20/2018 re-classification hearing, the Department had a conference call with the Town of Island Falls on 10/3/2018, to discuss the Town's questions regarding this particular upgrade proposal before the end of the public comment period.

Fish Stream

Mount Chase, Patten, Crystal and Island Falls; upgrade from Class B to Class A (approx. 25 miles). Proposed by The Nature Conservancy.

Recommend revising 467(7)(D)(2)(c) as follows:

- (2) Mattawamkeag River, tributaries - Class A unless otherwise specified.
- ~~(c) Fish Stream - Class B.~~

General comment in support: Paul Sheridan, citizen, Northport.

Paraphrased comments in support: Chloe Chunn, citizen, Swanville; Nick Bennett, Natural Resources Council of Maine, Augusta.

1. Much of Fish Stream goes through Crystal Bog, which is a bog and fen with many rare plants and animals. It has 16 different species of orchids and the eastern-most stand of the white fringed prairie orchid. Of the approximately 50 species of sphagnum that occur in Maine about half are in that one area. Crystal Bog is recognized nationally and by the Maine Natural Areas Program as a very outstanding natural feature in Maine.
2. Fish Stream in Patten has very high-quality habitat. This is a very worthwhile upgrade proposal and NRCM supports it strongly.

Paraphrased comments in opposition: Raymond Foss, Martin McCarthy, Ken Perkins, Reginald Porter Sr., Lana Tucker, Gregg Smallwood, Town of Patten.

1. The Town of Patten opposes the proposed upgrade.
2. The waterways were and remain the lifeblood of our communities. Fish Stream was the center of commerce for early mills; currently Haymart occupies the old mill and uses it for grain storage. An upgrade could create undue burdens on future development. We are concerned about the need for the classification change and about possible impacts this change could have on: downtown development; other industrial or commercial usage upstream such as the Pickett Mountain mining site; future use of the closed municipal landfill that abuts Fish Stream; sewer and septic systems; and other commercial and industrial development, the manner and extent of which cannot be foreseen.
3. Neither The Nature Conservancy (TNC), which submitted this upgrade proposal, nor the Department coordinated or discussed the proposed changes with the Town. We regret that we were not informed about the proposal and the potential impacts of the change.
4. According to the proposal, there is no problem with water quality and there is no current discharge. The rationale for an upgrade is to protect and secure TNC's investment. Based on information available to the Town, the stream already meets Class A quality under the existing Class B designation. Why does the stream need to be upgraded when it already meets Class A standards?

MDEP response

The commenters raise various concerns regarding how an upgrade to Class A may affect future development efforts in the Patten area. While the Department is unaware of any pending discharge license applications or concrete development efforts in the immediate area, any new development or re-development of an existing site might be affected if it required a license for a discharge to Fish Stream because Class A standards are stricter than Class B standards. However, the monitoring data that the Department considered in evaluating this proposed

upgrade indicates that Class A water quality standards are currently being attained in this segment, and the commenters generally do not make any arguments or submit any evidence calling into question the Department's attainment finding. The Department's monitoring data and attainment finding are acknowledged and accepted in the Town of Patten's comments. Under a provision of Maine's statutory antidegradation policy (38 M.R.S. § 464(4)(F)(4)), "(w)hen the actual quality of any classified water exceeds the minimum standards of the next highest classification, that higher water quality must be maintained and protected. The board shall recommend to the Legislature that that water be reclassified in the next higher classification." Given this statutory directive, and in light of the lack of evidence and arguments calling into question the Department's attainment finding for this segment, the Department believes that it must recommend to the Legislature that it make this proposed upgrade to Class A.

The Department notes that development of the Pickett Mountain mining site would not be affected by this upgrade because the site is not within the Fish Stream watershed; all potential runoff from that site would enter the West Branch Mattawamkeag River upstream of the confluence with Fish Stream. Based on the Department's general understanding of the conditions in the Town of Patten, it does not believe that the recommended upgrade will require the construction of a new wastewater treatment plant. The Department is unable to respond to hypothetical questions and scenarios regarding other potential effects of the recommended upgrade, which would depend on the Department's consideration of actual and specific facts and circumstances.

SACO RIVER BASIN

Back Brook and tributaries

Back Brook and tributaries, Limington; upgrade from Class B to Class A (approx. 13 miles). Proposed by MDEP.

Recommend revising § 467(12)(B) as follows:

B. Saco River, tributaries, those waters lying within the State - Class B unless otherwise specified.

(5) Back Brook and its tributaries (Limington) – Class A.

No comments in opposition.

Paraphrased comment in support: Nick Bennett, Natural Resources Council of Maine, Augusta.

1. Back Brook is a good trout stream and also has the potential for Atlantic salmon restoration. It is in the Saco watershed, and NRCM strongly supports this proposal.

ST. JOHN RIVER BASIN

Salmon Brook and tributaries

Salmon Brook and tributaries above Rt. 228 crossing on main stem in Perham (Perham and Westmanland), and West Branch Salmon Brook and tributaries above the Washburn/Wade town line (T14 R5 WELS, Perham, Wade); upgrade from Class B to Class A (approx. 48 miles). Proposed by The Nature Conservancy and MDEP.

Recommend revising 467(7)(D)(2)(c) as follows:

(2) Aroostook River, tributaries, those waters lying within the State - Class A unless otherwise specified.

(a) All tributaries of the Aroostook River entering below the confluence of the Machias River that are not otherwise classified - Class B.

(n) Salmon Brook and its tributaries (Perham, Westmanland) above Rt. 228 crossing on main stem in Perham – Class A.

(o) West Branch Salmon Brook and its tributaries (Wade, Perham, T14 R5 WELS) above the Washburn-Wade town line – Class A.

No comments in opposition.

General comments in support: Kathryn Olmstead, Caribou; Paul Sheridan, citizen, Northport.

EASTERN COASTAL BASIN

Tunk Stream and tributaries

Tunk Stream and tributaries (T7 SD, Sullivan, T10 SD, Cherryfield) upstream of Route 1, Steuben; upgrade from Class B to Class A (approx. 68 miles). Proposed by MDEP.

Recommend revising §§ 468(2) and 468(8) as follows:

2. Hancock County.

N. Township 7 Southern Division.

(2) Tributaries to Tunk Stream – Class A.

O. Sullivan

(1) Tributaries to Tunk Stream – Class A.

P. Township 10 Southern Division.

(1) Tunk Stream and its tributaries – Class A.

8. Washington County.

P. Cherryfield.

1) Tunk Stream and its tributaries – Class A.

No comments in opposition.

Paraphrased comments in support: John Burrows, Atlantic Salmon Federation (ASF) and Maine Council of the ASF (MC-ASF), Brunswick; Jean Beckley, citizen; Jeff Beckley and Sarah Brandon, citizens, Unionville; Russell Heath, Downeast Salmon Federation, Columbia Falls; Gabby, citizen; Joseph Huber, citizen, Steuben; Kathryn Olmstead, citizen, Caribou; Sheila Unvala, citizen, Steuben; Mark Whiting, citizen.

1. An upgrade is justified by the free-flowing, scenic and high quality waters in this watershed. Tunk Stream had historical sea-run Atlantic salmon as recently as the 1980s. This watershed is part of the Downeast Salmon Habitat Recovery Unit (SHRU) and could (and should) play a role in salmon recovery. The headwaters of this watershed are in the Tunk Lake Public Reserve Lands (and adjacent to the Donnell Pond Public Reserve Lands).
2. Tunk Stream remains an important brook trout stream with other important recreational fisheries that are managed by the Maine Department of Inland Fisheries & Wildlife in Tunk and Spring River Lakes. Steuben has an important commercial alewife fishery in these waters. An upgrade to Class A will provide protection for this important resource.
3. ASF and MC-ASF fully support the proposal. The Tunk watershed is an ecologically and recreationally valuable resource that is largely undeveloped and well-forested, and it is an area that many of our members appreciate and enjoy. The proposed upgrade is well-deserved and highly appropriate for this valuable stream network.
4. Given the connections with Atlantic salmon, the historic fishery, and the potential for a role in salmon recovery, a classification to Class AA is justified.

MDEP response

The Department received a number of comments supporting an upgrade of these waters to Class A, and no comments in opposition. Several of the commenters also urged consideration of a further upgrade of Tunk Stream to Class AA.

A further upgrade to Class AA would protect habitat for the endangered Atlantic salmon at the highest level. An upgrade would generally preclude the construction of dams and other water control structures because of the Class AA requirement that habitat be characterized as "free-flowing and natural." In addition, under Class AA conditions, no direct discharge of pollutants would generally be allowed, although limited exceptions would apply. Class AA conditions might also place more stringent limits on water withdrawal, which could affect agriculture operations in the area of the upgrade.

In response to these comments, and based on additional review and analysis of applicable data and conditions, the Department believes that a further upgrade to Class AA could be supported in the future. However, because the Department did not originally propose an upgrade to Class AA and took no public comment on such a recommendation, the Department cannot make such a recommendation now.

COMMENTS RECEIVED ON AMENDMENT TO STATUTORY LANGUAGE

PENOBSCOT RIVER BASIN

Lower Penobscot River

Penobscot River in Milford, Old Town, Bradley, Orono, Eddington and Veazie; amend statutory language (approx.9.4 miles). Proposed by Penobscot Nation and The Nature Conservancy.

Recommend revising § 467(7)(A)(5) as follows:

A. Penobscot River, main stem.

(5) From the West Enfield Dam, including the Stillwater Branch, to the ~~Veazie~~ Milford Dam, including all impoundments - Class B.

(6) From the ~~Veazie~~ Milford Dam, but not including the ~~Veazie~~ Milford Dam, to the Maine Central Railroad bridge in Bangor-Brewer - Class B. Further, the Legislature finds that the free-flowing habitat of this river segment provides irreplaceable social and economic benefits and that this use must be maintained.

No comments in opposition.

General comments in support: Natalie Charles, citizen, Belfast; Marissa Keminidi, citizen; Dennis King, citizen, Freeport; Susan Lauchlan, citizen, Waldo; Paul Sheridan, citizen, Northport.

Paraphrased comments in support: John Burrows, Atlantic Salmon Federation (ASF) and Maine Council of the ASF, Brunswick; Andrew Cadot, citizen, Portland; Landis Hudson, Maine Rivers, Yarmouth; Nick Bennett, Natural Resources Council of Maine, Augusta; Laurie Osher, Town of Orono; Dan Kusnierz and Kirk Francis, Penobscot Nation, Indian Island.

1. Sea-run fish like alewives and shad are returning in huge numbers after the removals of the Veazie and Great Works dams. Maine needs to protect and capitalize on the enormous investment (about \$60 million) of public and private funds in the Penobscot restoration by requiring that the river stay free-flowing below the Milford Dam. Keeping this segment of the river free-flowing will not only perpetuate the massive ecological gains achieved by the Penobscot River Restoration Project, but also support and grow Maine's natural resource-based economy, boosting commercial fishing, sport fishing and outdoor recreation.
2. With the return of millions of sea-run fish to their native waters, members of the Penobscot Nation are now seeing fish species that their ancestors historically fished for and that had not been seen in their reservation for over 100 years. Penobscot Nation members are starting to fish for some of these fish once again and hope that there will be large enough populations of all species that they can be fished again soon.
3. The Town of Orono has benefited from the dam removal by having a free-flowing river, for example when the Penobscot Nation hosted the national White Water River races for three years in a row and brought a lot of people into town.

COMMENTS RECEIVED ON CORRECTION OF CLASSIFICATION ERROR

PENOBSCOT RIVER BASIN

East Branch Penobscot River

East Branch Penobscot River from its confluence with the Mattaceunk impoundment to its confluence with the West Branch Penobscot River, Medway; correct classification error (approx. 1.6 miles). Proposed by MDEP.

Recommend revising § 467(7)(B)(1) as follows:

B. Penobscot River, East Branch Drainage.

(c) From a point located 1,000 feet downstream from the dam at the outlet of Grand Lake Mattagamon to its confluence with the ~~West Branch~~ Mattaceunk (Mattaseunk) impoundment as it existed on July 14, 1990 - Class AA.

(d) From its confluence with the Mattaceunk (Mattaseunk) impoundment as it existed on July 14, 1990 to its confluence with the West Branch - Class B. Further, there may be no new direct discharges to this segment after January 1, 2019.

Paraphrased comment in opposition: Diane Oltarzewski, citizen, Belfast.

1. I would like to see this downgrade reversed! Our goal should always be to enhance the natural purity of the waters so I find the downgrading from AA to B disturbing. Please continue to work for ever cleaner waters for Maine and especially for Wabanaki people who depend on these waters for sustenance to a greater extent than non-Natives. Please put their health and well-being as your top priority.

MDEP response

This proposal does not constitute a downgrade but rather an error correction. In 1990, when a large stretch of the East Branch Penobscot River was upgraded from Class B to Class AA, the most downstream 1.6-mile segment of the River was already impounded by the Mattaceunk Dam on the upper main stem Penobscot River and so did not meet the Class AA narrative criterion that the “habitat must be characterized as free-flowing and natural”. This was an oversight by the Department that resulted in a drafting inaccuracy with respect to this impounded segment during the 1989/1990 re-classification effort. This error will be corrected in the current effort by returning the segment in question to the original Class B designation.

**COMMENTS RECEIVED ON UPGRADE PROPOSALS NOT RECOMMENDED BY
THE DEPARTMENT**

ANDROSCOGGIN RIVER BASIN

Androscoggin River Main Stem

Androscoggin River main stem, Lisbon Falls, from Durham Boat Launch or Worumbo Dam, to mouth of the Androscoggin in Merrymeeting Bay (line between Pleasant Pt., Topsham and North Bath); upgrade from Class C to Class B (approx. 14 miles). Proposed by Friends of Merrymeeting Bay.

General expression of support of upgrade: Marissa Keminidi, citizen; Matt Scott, citizen, Belgrade.

MDEP response

Monitoring data from Friends of Merrymeeting Bay and MDEP, as well as modeling results from MDEP, indicate that Class B water quality standards are not always attained. This situation is attributable to upstream sources (including sources affecting tributaries), non-point sources and the effects of the three dams located in this section of the river. Below the Brunswick-Topsham Dam, incoming tides from Merrymeeting Bay and Sediment Oxygen Demand further contribute to Class B non-attainment, while the licensed discharge in this section has little impact. The Department is not aware of any changes in the watershed of this segment that would significantly alter the conclusions of MDEP's current model. Therefore, the Department does not support an upgrade of this section of the river at this time.

PENOBSCOT RIVER BASIN

Blackman Stream

Blackman Stream and tributaries, Bradley and surrounding towns; upgrade from Class B to Class A (approx. 66 miles). Proposed by The Nature Conservancy.

General expression of support of upgrade: Marissa Keminidi, citizen; Paul Sheridan, citizen, Northport.

MDEP response

Water quality in this segment appears to be affected by logging activities and some agricultural landuse. Biological communities did not meet Class GPA aquatic life standards in Davis Pond in 2016. Ponds in the watershed are all moderately productive suggesting some nutrient enrichment. In-stream monitoring data from Blackman Stream and some tributaries are needed to determine the likelihood of attainment of Class A standards. Therefore, the Department does not support an upgrade of these waters at this time.

ST. JOHN RIVER BASIN**Limestone Stream**

Limestone Stream, below Long Road, Limestone; upgrade from Class C to Class B (approx. 4.5 miles). Proposed by a citizen.

General expression of support of upgrade: Marissa Keminidi, citizen; Kathryn Olmstead, citizen, Caribou.

MDEP response

Water quality in this segment of the Stream appears to be affected by agricultural landuse, which is widespread upstream of and along the section of stream proposed for upgrade. Biological communities do not always attain Class B aquatic life criteria and nutrient concentrations in the stream are elevated. Given the intensive agricultural landuse in the watershed, it is not expected that the section of Limestone Stream below Long Road can attain Class B standards and thus the Department does not recommend an upgrade at this time.

Appendix

Table 1. List of 185 citizens who signed an identical form letter of the Natural Resources Council of Maine (listed by date/time received, oldest to most recent)

| Name | Town (ME unless otherwise noted) |
|------------------------|---|
| Beth Comeau | Richmond |
| Bonnie Faith | Cambridge, MA |
| George Whitridge | Castine |
| Darvin Schild | North Arlington, NJ |
| Walter Elery Keene | Winslow |
| Tatyana Eckstrand | Waldoboro |
| Gretchen Stanton | Portland |
| Arthur& Charlotte Mary | Topsham |
| Vinnedge Lawrence | West Baldwin |
| Maryann Smale | Steuben |
| Eileen Purdy | Portland |
| Dorothy Anderson | Weymouth, MA |
| Denis Cote | Alfred |
| Sandra Hempe | Bath |
| Tracey Allen | Scarborough |
| Rosalind Ivens | Bucksport |
| Janet Laird-Lagassée | Auburn |
| Kathryn Begg | Auburn |
| David A. Woolsey | Ellsworth |
| Karralena Castaway | Limestone |
| Randi Smith | Industry |
| Michelle Henkin | Bristol |
| Semena Curlik | Blue Hill |
| Sharon Finley | Kennebunk |
| Beth Pauls | Falmouth |
| Martha Goodale | Westbrook |
| Rebecca Tripp | Searsport |
| Ronald Ross | Boothbay |
| Hannah Kreitzer | Bangor |
| Margot Carpenter | Belfast |
| Debbie McCarthy | Phillips |
| Nancy Babcock | Newry |
| Alan Liska | Portland |
| Natasha Mayers | Whitefield |
| Steve Heinz | Cumberland |
| Antonio Blasi | Hancock |
| Ellen Rice | Brunswick |
| Don and Leslie Bush | Cherryfield |

| Name | Town (ME unless otherwise noted) |
|---------------------|---|
| Roger Panek | Damariscotta |
| Mercedes Grandin | Brunswick |
| Adinah Barnett | Portland |
| Angus Fake | Newcastle |
| Mary Meier | Topsham |
| Maria Cruz | South China |
| Doreen Mann | Lisbon |
| Marjorie Monteleon | Southwest Harbor |
| Nancy Earle | Bangor |
| Mark Koenig | Farmingdale |
| David Blais | Portland |
| Douglas Hardy | Brunswick |
| Susan Allison | Greene |
| Marian F. McAleenan | Rockport |
| Doris Luther | Hollis |
| Nancy Prince | Wilton |
| George Smith | Mount Vernon |
| Randy Mraz | Freeport |
| Martha Dickinson | Ellsworth |
| Joe Lendvai | Brooklin |
| Richard Stevens | Portland |
| Sally Greene | Brunswick |
| Karen Mook | Newcastle |
| Elizabeth Chapman | Cumberland |
| Christa Schwintzer | Orono |
| Rebecca Wood | South Portland |
| Kevin Macdonald | Belgrade Lakes |
| Earle Kasregis | Roxbury |
| Hannah McGhee | Newcastle |
| Bob Kohl | Liberty |
| John Wyatt | Winterport |
| Barbara McPherson | Pittsfield |
| Louisa Beckett | South Portland |
| Todd Towle | Kingfield |
| Linda Woods | Waterville |
| Wanda Whitten | Limington |
| Martha Briggs | Windham |
| Donna Wheeler | Farmington |
| Janine Moore | Waterville |
| Linda Stevens | Scarborough |

| Name | Town (ME unless otherwise noted) |
|-------------------------|---|
| David Hedrick | Waterville |
| Michael Haskell | Scarborough |
| Marie Underwood | Searsport |
| Suzanne Brewer | Portland |
| Julie Nolon | Bath |
| Bonnie Dean | Blue Hill |
| Nina Gimond | Waterville |
| Lenore Sivulich | New Gloucester |
| David Dodson | Camden |
| John Bernard | South Portland |
| Barry Smith | Island Falls |
| Cheryl Evangelos | Warren |
| Jim Murton | Vassalboro |
| Gordon Smith | Brunswick |
| Janice Kasper | Swanville |
| Marion Freeman | Freeport |
| Jenni Reis | Corinth |
| Christine Burgin | New York, NY |
| Richard A. Hesslein Jr. | Brownfield |
| Sarah Brown | Kittery |
| Gabrielle Grunkemeyer | Bryan, TX |
| Joanna Holland | Bristol |
| Lorrel Nichols | Brunswick |
| Paula Lepore | Berwick |
| Jaren Willey | Chelsea |
| Hannah Osborne | Freeport |
| Richard Roelofs | Blue Hill |
| Andrea O'Neill-Knarr | Carmel |
| Stephanie Pruzansky | Phippsburg |
| Theresa Neill | Ogunquit |
| Ken Converse | Bridgton |
| Jacqueline Davidson | Deer Isle |
| David Palmer | Portland |
| David Miller | Newcastle |
| Janet Williams | Searsport |
| Robert Zuidema | Standish |
| Glenn Tikkanen | Norway |
| Sharon Dolleman | West Paris |
| Deborah Bastian | New Gloucester |
| Greg Kimber | Temple |

| Name | Town (ME unless otherwise noted) |
|--------------------|---|
| Thomas Kellogg | Deer Isle |
| Belinda Pendleton | Belfast |
| Robert Fritsch | Dexter |
| Edward Walworth MD | Lewiston |
| Barbara Nathanson | Northport |
| Catherine Syrett | Owls Head |
| Lucie Springman | South Portland |
| Peg Hobbs | Washington |
| Mary Griffith | Freeport |
| Pam Lombard | Hallowell |
| Drew Porter | Westport Island |
| Barbara Goodbody | Portland |
| Eliot Paine | Bar Harbor |
| Sarah Harvey | Woolwich |
| Jae Min Yoo | Brunswick |
| Sheila Schoolcraft | Garland |
| Peggy York | Portland |
| Eve Sawyer | Portland |
| Ann Pistell | Pittston |
| Greg Runge | Isle Au Haut |
| Peter Abello | Freedom |
| John Perna | Milford |
| Jeff Mac Donald | Brownville |
| Honora Brehm | Ellsworth |
| Patricia Boston | Biddeford |
| Sharon Martin | Turner |
| Mariellen Whelan | Newcastle |
| Eleanor Wright | Sargentville |
| Gary Burke | East Wilton |
| Jaremy Lynch | Harpwell |
| Len Clarke | Port Clyde |
| Jerry Provencher | Bath |
| Juliette Dzija | Auburn |
| Bill Garcelon | Portland |
| Sarah Oldham | Portland |
| Joyce A Bailey | Windham |
| Helen Anderson | Portland |
| Heather Sharkey | Brunswick |
| Carol Dana | Old Town |
| Christine West | Orland |

| Name | Town (ME unless otherwise noted) |
|------------------|---|
| Barbara McClure | Hancock |
| Tait Nygaard | Bath |
| John Smedley | Lewiston |
| Ian Gordon | Stetson |
| Sandra Howard | Caratunk |
| Nicole Hamlin | Augusta |
| Nancy Galland | Stockton Springs |
| Patricia Kaplan | Belmont |
| Shirley Hager | Chesterville |
| Beedy Parker | Camden |
| William Nelson | Belfast |
| Phyllis Coelho | Belfast |
| Courtney Byers | Waldo |
| Mariana Tupper | Yarmouth |
| Ron Huber | Rockland |
| Natalie Charles | Belfast |
| Edward Farwell | Holden |
| Mary Hartley | Blue Hill |
| Meredith Bruskin | Swanville |
| Nancy Button | Warren |
| Nancy Kelly | Stockton Springs |
| Wayne Cobb | Portland |
| Lynne Gilbert | Bristol |
| Kate Harris | Belfast |
| Nancy Kane | Belfast |
| Shri Verrill | East Machias |
| Erin Covey-Smith | Freeport |

Table 2. List of 34 citizens who signed a form letter of the Natural Resources Council of Maine but altered portions of it (listed by date/time received, oldest to most recent)

| Name | Town (ME unless otherwise noted) |
|------------------|---|
| Brian Gingras | Braintree, MA |
| George St. Clair | Portland |
| Pamela Matthews | Phillips |
| Carolyn Bryant | Brunswick |
| Julia Brown | Portland |
| Harrah Lord | Rockport |
| Elliot Robinson | Scarborough |
| Kathy Missal | Woolwich |
| Barbara Clark | Brunswick |

| Name | Town (ME unless otherwise noted) |
|--------------------------|---|
| Carol Howell | Jefferson |
| Laura Patterson RN | Waterville |
| Tia Simon | Gorham |
| Jane Whitney | Brooklin |
| Wanda Allen | Brownfield |
| Thomas Fallon | Rumford |
| Tony Owens | Cape Elizabeth |
| Steve Plumb | Nobleboro |
| William Leavenworth | Searsmont |
| Joan Bromage | Mount Desert |
| David Butler | Windham |
| Al Mendelsohn | Kennebunk |
| Arilda Densch | Kittery |
| Greg and Catharine Moser | Portland |
| Joel Tompkins | Brunswick |
| Susan Kepner | York |
| Leah Cook | Grand Isle |
| Chuck Dinsmore | Damariscotta |
| Barbara Kates | Bangor |
| Linda Swackhamer | Veazie |
| Susan Dickson-Smith | Gouldsboro |
| Susan Smith | Gouldsboro |
| Brian Athorp | Dedham |
| Karl Watkins | Belfast |
| Steve Cartwright | Tenants Harbor |