



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



July 14, 2025

Debbie-Anne A. Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**RE: Notice of Application Ready for Environmental Analysis and Soliciting Comments, Recommendations, Terms and Conditions and Prescriptions, Lewiston Falls Hydroelectric Project (FERC No. 2302-101)**

Dear Secretary Reese:

On May 15, 2025, the Federal Energy Regulatory Commission (FERC) issued a *Notice of Application Ready for Environmental Analysis and Soliciting Comments, Recommendations, Terms and Conditions, and Prescriptions* (REA) for the Lewiston Falls Hydroelectric Project (FERC No. P-2302) on the Androscoggin River, Maine. The Maine Department of Inland Fisheries and Wildlife (MDIFW) offers the following comments in response to the REA notice.

Respectfully,

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Cc: Tim Peabody, MDIFW Deputy Commissioner  
John Perry, MDIFW Environmental Review Program Supervisor  
Liz Latti, MDIFW Fisheries Division, Augusta Headquarters  
James Pellerin, Nicholas Kalejs, MDIFW Region A Fisheries  
Casey Clark, Lars Hammer, MDMR  
Laura Paye, Claire Briggs, MDEP  
Patrick Dockens, USFWS  
William McDavitt, NMFS

## **Maine Department of Inland Fisheries and Wildlife Comments on REA**

### 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.

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 Final License Application (FLA), the applicant proposes “target” limits to impoundment fluctuations of one foot or less, daily, during the May 15-June 30 bass spawning season. Meeting this target limitation should help promote successful bass spawning and MDIFW appreciates this modification to proposed operations for the FLA. However, the utilized language of a “target” fluctuation is unclear, and leaves open the possibility for larger, potentially damaging drawdowns during this critical period. MDIFW recommends that a more unambiguous, one foot limit to drawdowns is included as a condition of the project license and will continue to pursue this option through FERC relicensing and the Water Quality Certification (WQC) process.

Although bass species represent some of the most abundant fish in the project impoundment, other species that spawn during alternative times of year (Cyprinids, other Centrarchids, etc.) will still be vulnerable to large drawdowns and are afforded limited protections under allowable project operations. By changing impoundment level elevation, significant drawdowns are likely to alter the amount of usable spawning habitat for other resident fish species. Table 3-7 of the Water Quality Study Report in the FLA indicates that 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%).

Though MDIFW does recognize the influence of upstream facilities on water levels in the Project impoundment and the alterations to operations proposed during the bass spawning season, fluctuations in the impoundment of greater than one foot remain concerning and could negatively impact resident aquatic species. To avoid unnecessary impacts to aquatic species and habitat, MDIFW recommends that fluctuations in the Project impoundment should be limited to one foot or less year-round without prior approval, consistent with hydropower recommendations across similar projects statewide.

### 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 proposed enhancements to the concrete boat ramp will be beneficial to a stable launch area, they do not address environmental variation occurring throughout the impoundment. Further, if large impoundment fluctuations lead to recruitment failure for resident fish species, recreational opportunities to fish for said species will inevitably suffer.**

MDIFW appreciates the inclusion of capacity and amenities for both Project and non-Project recreational facilities. Currently, the Project has adequate facilities for trailered boat access to the impoundment and riverine reaches below. However, it should be noted that any proposed changes to Project recreational access should be made in consultation with MDIFW. Additionally, the applicant should continue to explore locations that may allow for enhanced angler access to the tailrace, which is typically a popular fishing location for both resident and diadromous species.

In conclusion, MDIFW respectfully requests that FERC include these dimensions of project relicensing in its environmental analysis.