April 23, 2021 **Aziscohos Project (FERC No. 4026)**

Low Impact Hydropower Institute
1162 Massachusetts Avenue
Arlington, MA 02476

Subject: **"Aziscohos Comments"**

Low Impact Hydropower Institute:

On behalf of myself, fellow environmentalists, and the future enjoyment of the Aziscohos Lakes region, below you will find my comments on the "Low Impact Hydropower Institute Application for the Aziscohos Project (FERC No. 4026)" created by Brookfield Renewable.

I appreciate all consideration given to my comments.

I do not believe that current Project operations satisfactorily fulfill section 3.2.6 - Threatened and Endangered Species Protection, LIHI Handbook, 2nd Ed. Current Project operations and water flow regimes result in massive shoreline desiccation and rapidly changing lake levels. These flow regimes are resulting in a negative effect on the federally protected population of migratory loons which nest on the impoundment of Aziscohos Lake.

Rapid lake level increases or decreases have been known to negatively impact loon nesting. According to "Aziscohos Lake Common Loon Population and Productivity Survey and Management Report: 2011 Season Final Report" published by the Biodiversity Research Institute in Gorham, Maine, **twenty five percent** of all failed loon nests were directly attributed to water level decreases. As a result, **nearly sixteen percent** of all loon nests directly failed because of water level fluctuations attributed to Project operations.

Whereas Project operations jeopardize the reproduction of federally protected migratory loons, I do not believe that they are in adherence to Standard F-2.

I do not believe that Project operations satisfactorily fulfill section 3.2.8 - Recreational Resources, LIHI Handbook, 2nd Ed. Current Project operations do not provide for recreational boating access to its associated waters without a fee or charge. De facto boating access to Aziscohos Lake must either occur on private property, at the state boat ramp at Black Brook Campground (w/ fee), or at the gated/locked boat ramp maintained by Project operations (exclusive to residents of Wilsons Mills, Maine).

Whereas Project operations does not fulfill section 3.2.8. criteria to provide recreational access to its associated waters without a fee, I do not believe they are in adherence to the goals of the LIHI.

I do not believe that Project operations satisfactorily fulfill section 3.2.5 - Shoreline and Watershed Protection, LIHI Handbook, 2nd Ed. Current Project operations do not protect the conditions of the soils, vegetation, and ecosystem functions of the shoreline within the Project's nexus on the impoundment of Aziscohos Lake.

Whereas the nexus of Project operations includes the Aziscohos Lake basin from the elevations of 1520.3 to 1,475.3, the current FERC licensing allows for a **forty-five foot drawdown.** Not only does current licensing results in **no drawdown limit**, current Project operations usually result in fluctuations of ~25 feet, annually. **It should be noted** that the average/mean depth of Aziscohos Lake is ~31 feet, with locations at the Northern portion of the lake averaging much more shallow than the Southern portions of the lake.

Once again, I appreciate all consideration given to my comments.

Thanks,

Benjamin Teele
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Bibliography

1. Chickering, M. D., J. Fair, K. Taylor, I. Johnson and D. Evers. 2011. Aziscohos Lake Common Loon Population and Productivity Survey and Management Report: 2011 Season Final Report submitted to NextEra Energy Maine Hydro. Report BRI 2011-25. Biodiversity Research Institute, Gorham, Maine. URL: https://www.briloon.org/uploads/Library/item/10/file/BRI%202011-25_Aziscohos_2011_final_Report_full-submitted.pdf