

July 8, 2019

Judy A. Camuso  
Commissioner of Inland Fisheries and Wildlife  
41 State House Station  
Augusta, Me. 04333

Re: Meeting on alewife concerns - June 26, 2019

Dear Commissioner:

Thank you for spending the time with Mr. Lance Wheaton and myself in your office to address several issues that are now facing Washington County and the State of Maine.

As we discussed, our County is at the precipice of experiencing an environmental disaster of immense proportions. With the removal of blockages in the fishways at the Milltown, Woodland, and Grand Falls dams, alewives are now entering our waters in ever increasing numbers. As you are aware, the last time this was done in the 1970-80's the Spednic Lake fishery crashed and harm was also done to Big Lake, Long Lake and the Grand Falls Flowage. It is a travesty that this is being allowed **again**, due to inadequate research and limited data that was submitted to the State, claiming that the alewife was native to the upper St. Croix Watershed and that they would not be harmful.

As a result of this deficient and incomplete "*science*" the EPA issued a letter on July 8, 2012 in error, claiming that the State of Maine was in violation of the Clean Water Act, if it did not open its fish ways, allowing the passage of the "*natural occurring*" alewife. In their letter they were careful to state that this decision was based solely on the science available at that time. Since then, there has been substantial evidence that has been discovered to disprove this theory, as there were **at least three** natural barriers within the St. Croix River preventing alewives from accessing the upper lakes during colonial times before the dams were built. Canadian environmental reports during the 1870's (before the Milltown dam was constructed) back up this information where they state that the alewives could not climb over Salmon Falls, located where the Milltown dam is today because of the excessive river velocity during the normal spring freshet. In fact, preliminary hydraulic calculations have shown that the river velocity at this location was almost three times the swimming capability of the alewife, making it impossible for them to swim upstream and this does not even take into account the severe turbulence, due to the substantial drop in elevation that was present at this location as well.

Additionally, detailed fish surveys conducted by the Maine Inland Fisheries and Wildlife (the Department) during the 1950's found no evidence of alewives in **any** of the lakes of the upper St. Croix Watershed. Plus, there are many other factors that have been recently discovered and categorized, proving through ancient colonial records that alewives were never native to this region as outlined in reports/letters to the Department.

A short time ago, the stoppage within the fishway at the West Grand Lake dam was ordered to be removed and now, alewives along with another invasive species of large mouth bass are entering that lake and others above it. It is bad enough that Big Lake's salmon population is currently being ruined by alewives, but now with them entering West Grand Lake, it puts that superb salmon fishing along with the State Hatchery at severe risk. It seems ironic that recently millions of dollars were spent to construct a new intake for that facility, which utilizes water from the lake to grow its salmon, since it is a well known fact that alewives carry a disease that affect salmon and they also cause a thiamine deficiency in that species as well. Additionally, alewives have been known to destroy the rainbow smelt population, which is the primary food supply for landlocked salmon and without that food source, salmon become long and skinny as we have observed on the other lakes in our region that contain alewives. Proponents of alewives have always argued that lake or landlocked alewives are the problem and not anadromous (river run alewives), but this is ridiculous and naïve as they have been known to take up year round residence as well in any body of fresh water. Thus, creating a year round permanent population of alewives within the lake.

What is most ironic and problematic, these detrimental effects and others were all identified in a 1988 report by the Department of Fisheries and Oceans - Steering committee where they stated their concerns on the harmful effects of alewives on rainbow smelt and juvenile smallmouth bass. As they stated in that report, *"unless the alewives can substitute for the smelt, speculation is that there may be some reduction in the landlocked salmon growth rate...."* In that report they also stated, *"restoration of an appreciable alewife resource could have side effects ...there is some concern that heavy grazing by juvenile alewives will be competitive with the juvenile rainbow smelt and with juvenile smallmouth bass in Spednic Lake."* Unfortunately, all of their predictions came true.

How can we be so sure that a disaster is about to take place? One only has to look at Spednic Lake and its demise along with its long recovery process, due to alewives. Excessive draw downs were not the cause as some people have suggested as lake levels within that body of water have been operated the same way for the past 60 years. Data supplied by the paper company, who are required to keep such records of lake levels for operation of the dams proved without a doubt that draw downs had little or nothing to do with it. Plus, Spednic Lake only recovered because of the reseeding of bass, conducted in the late 80's and the closure to alewives in 1986. Prior to, during and after all of this was done, the operation of lake levels never changed. Therefore, it is only common sense that if water levels were indeed a problem the lake would never have recovered.

Additionally, Maine Biologists employed within the Inland Fisheries and Wildlife (the Department) through their extensive studies proved that the alewives were the culprit, writing many reports outlining those facts and they pleaded for additional funding to continue their vital work at Spednic, but it fell on deaf ears. Now, thirty-three years later the lake is finally starting to return to its previous glory, but only because alewives were no longer allowed to enter its waters. However, with the recent opening of the fishway at the Vanceboro dam, this tragedy is about to repeat itself, which is really impossible to believe or understand. How can the State be so blind and have such disregard for our sport fishery?

However, that is not the only proof of their harmful effects. Round Lake in

Charlotte has been decimated by alewives. Once, a tremendous smallmouth bass lake, it is now a dead body of water with no fish at all to speak of. Pennamaquan Lake, which is downstream from this has been destroyed as well with only a few big fish being found. The once healthy cross-section of fish sizes, which was known to be in both lakes has been literally wiped out by alewives as they have come by the thousands into this watershed every spring. Nonetheless, it does not stop there.

Crawford and Pocomoonshine lakes are now starting to show the devastating effects of alewives as well. Catches have significantly decreased, according to anglers and adult alewives (12-14 inches) have been seen roaming the shores as late as mid August, proving that a majority of them do not return to the sea as most proponents have suggested. In fact, the Lake George study completed by the Department and the Department of Marine Resources (June 2002, revised October 2004) substantiated this phenomena, reporting that more than half of adult alewives do not return to the sea, but take up full time residence within the water body itself, being perfectly content to abandon their marine cycle. In all actuality, this only leads to the problematic compounding effect of the growing alewife population in a particular lake, year after year.

To this date, there have been no studies conducted on the effects of alewives during the spawning of bass or other species. Plus, within accepted past "*studies*" the allowance of alewives into our lakes has been based solely upon their determined "*non effect*" at a density of only six per acre (Lake George Study). In reality, many biologists and proponents of alewives have predicted that once an alewife run is fully established the actual density rate will be anywhere from 300-1100 per acre and more. It is illogical and ludicrous to assume that there will be no detrimental effects at these actual large concentrations as these fish will need to eat. Consuming huge amounts of plankton before any other species of fish are born, puts a tremendous strain on young of the year (YOY) fish, stifling their ability to put on weight to survive their first winter. With the rapid reduction of available food, soon smaller fish are no longer observed in a lake's ecosystem and this eventually leads to a dying lake. All of this was extremely evident in Spednic Lake as smaller fish and YOY of all species rapidly disappeared after the alewife population exploded, leaving nothing, but big fish. Once those were caught or died of old age, Spednic became void of almost any fish except alewives that were seen roaming the shores in huge numbers by divers while performing their studies. Most importantly, however, the Department's biologists discovered a very startling fact during this time period of the 1980-90's and that was alewives ate more than just plankton as their stomachs upon inspection contained insects, larvae, plants, fleas and small fish.

Actually, this is not surprising as we (guides and our guests) have caught alewives on 5/8 oz. spinner baits, #3 vibrax inline spinners, mooselook wobblers, tandem streamer flies, and even plastic baits, all of which are a little larger than plankton. Since, all of these artificial baits are meant to simulate bait fish, then if alewives only eat plankton according to the proponents, why would they attack these artificial baits? Common sense can provide only one predictable conclusion....alewives are definitely "*meat eaters*" and in large numbers they will exhaust a lakes food supply, causing havoc to its existing fishery. This only leads us to the following indisputable fact that when millions of additional mouths (alewives or any other invasive species) are added to an ecologically, balanced body of water, it will have a catastrophic effect on the native fish

population. As stated above with the devastating effects to Spednic Lake, Round Lake and others the undeniable bleak future should be obvious.

The St. Croix watershed and the entire State of Maine in fact, due to its current policy of introducing alewives is on a collision course with an environmental crisis of immense proportions. From past experience at Spednic Lake, it will take more than 50 years to rebuild our fishery, once it has been destroyed by alewives. This will leave us with a huge reconstruction program to contend with and it will be entirely dependent on, if the political powers to be are willing to spend such funds in the future to complete such a rebuilding program. That is, if the fisheries can be rebuilt at all. In the meantime, property values would plummet, businesses would close and sportsman tourism to our state would become almost nonexistent, leaving nothing, but a devastating impact to our economy and way of life.

To make things even worse, we are now getting reports in Big and Long Lake of 12-16 inch bass being mauled by an unknown predator. I have personally witnessed the evidence of teeth marks along the sides of two fish in Big Lake within the past few weeks and have received similar reports by other guides and guests of seven other incidences, which are similar in nature. Shockingly, in a couple of these cases, actual chunks of flesh had been taken out of the fish. Additionally, with other reports of several very “large” fish being seen (more than three feet in length) and breaking off lines within an instant, it is indeed beginning to look as if someone has illegally introduced pike into our waters as well. A guest staying at our camp last summer reported to me that he caught two of this species by the Route One bridge and being an avid fisherman from the Midwest, sadly and most importantly, he definitely knows the difference between pickerel and pike.

Regrettably, similar initial reports were received ten years ago, when largemouth bass first appeared on the scene and this species has now exploded in population within our waters. It is feared that the pike will do the same since as there is a current landlocked salmon population in Big and Long Lake, which is a favorite meal of pike. Naturally, these will be the first to go, followed by other species as pike are ferocious eaters, similar to sharks, which are true swimming, eating machines. If this proves to be true, one can only imagine with all of the fishways being open, now at all the dams what possible devastating effects will be seen in all of the lakes within the St. Croix Watershed including West Grand Lake.

It is indeed time that the State government realize the destruction of our current fishery is just over the horizon. Consequently, we implore state officials to take a stand and fight the Federal Government in court if need be, as their decision to order the State of Maine to illegally introduce the alewife is wrong. Additionally, further comprehensive studies must be conducted and heavy law enforcement, preventing the illegal transportation of fish in live wells must be carried out as it is evident that someone or a group of individuals are transporting largemouth bass and possibly pike.

It is obvious that the “*handwriting is on the wall*” and it is imperative that the State of Maine, acting through its Department of Inland Fisheries and Wildlife take action to block the fishways and impose a moratorium on the introduction of alewives to save our fisheries, otherwise, our present vibrant, environmental economy throughout Washington County and the State of Maine will surely die an agonizing death.

Sincerely,

Steven J. Whitman P.E./P.L.S.  
Master Maine Guide  
Princeton, Maine

CC: President Donald J. Trump  
Janet T. Mills - Governor  
Senator Dana L. Dow  
Senator Marianne Moore  
Rep. Kathy Javner  
Rep. William Tuell  
Rep. Anne Perry  
Brian D. Smith - Governor's Advisory Council  
John Arcaro - Grand Lake Guides Association  
Lance Wheaton - Village Camps  
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