

Landis Hudson, Yarmouth, ME.

Thank you for the opportunity to comment on the Proposed Study Plan (PSP) for the Rumford Falls Hydroelectric Project (Docket P- 2333-091) in Rumford, ME. The Project is located on the Androscoggin River in the Town of Rumford, Oxford County, Maine.

We are strongly in favor of requiring the application to complete a full recreational study. We understand that the Town of Rumford is requesting a comprehensive recreational plan to be completed to include trails and pathways, viewing opportunities and aesthetics, whitewater opportunities, fishing, and as well as other possible recreational uses of the Rumford Falls vicinity. We fully support this request. We are aware of reports that travelling by canoe through the area is extremely challenging because of poorly maintained and inadequate trails, and poor signage for portaging around the project area. We believe that these problems need to be addressed.

As noted by Maine State Senator Lisa Keim in a letter posted to the FERC website on June 2, 2020:

Public access on the property existed until 2014 when Brookfield closed access with very little explanation. Despite this long history of public access and use, the Falls Hill Trail and 'West Viewing Area' has never been included in the FERC licensing as a recreational asset of the project. In the past, this may have been less vexing due to the river's pollution, however, after years of expansive cleanup effort, this deterrent is thankfully no longer an issue. Public interest in the trail and viewing area has greatly increased. The people of Rumford, and the surrounding River Valley Area live in Western Maine, in part, because of their love of the outdoors. The recreational areas situated at Brookfield dam could be a real asset to the River Valley area, positively impacting the area's attractiveness, and the community's health and wellbeing.

It is in the public interest of the citizens of the greater River Valley area that a formal recreation plan be created by Brookfield, and attached to the license in perpetuity to ensure that access to these resources is not compromised in the future.

We firmly support the request made by Maine Inland Fisheries and Wildlife for a Minimum Flow Analysis to determine recommended minimum flows, specifically in the reach from Middle Dam downstream to the confluence with the Lower Station tailrace. We see the value in ensuring that any agreed upon minimum flow releases meet inland fisheries needs and assure attainment of water quality standards, to support the future health of this important community resource. We understand that this work will evaluate how various minimum flows influence the fishable aquatic habitat lotic and lentic reaches of the Androscoggin River. This minimum flow analysis should also address recreational interests.

Further, we believe that there is potential for American eel and we would like to see safe, timely and effective passage for American eel at this site.

Document Content(s)

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