John M Preble, Rumford, ME. Federal Energy Regulatory Commission 888 First Street, NE Washington, D.C. 20426

April 15, 2020

Regarding: Study Plan Commentary

Docket: P-2333

## Fisheries Study Plan

a. Habitat studies are needed for the upper pool, canal, lower pool, upper dam impoundments and middle dam discharge drainage to determine viability for stocking of fish to enhance and provide for reliable fishery within and near the project boundaries. Applicant is reluctant to perform such studies.

## Recreation Study Plan:

- a. Applicant proposes a usage survey. This is totally inadequate as nearly all recreational usage areas have been closed and posted for no trespassing. This situation demonstrates the applicants lack of attention and disregard of the community that surrounds the project. The applicant has repeatedly been requested to open the trail on the eastern shoreline and refuses to do so. Applicant has hidden behind stated safety, liability and maintenance concerns and is unwilling to make any expenditure to remediate.
- b. An independently run citizens focal group study should be undertaken at the expense of the applicant to determine appropriate access, usage, locations, and operational maintenance requirements. The focus group should consist of community leaders, recreational managers & organizations, civic organizations, and individual citizens users. The application should be mandated to comply with reasonable request from the focal group or license denied.

## Water Flow Study

- a. Applicant has suggested that no study is necessary and that historical license approvals should be renewed. Current license allows for minimum flow over the upper dam to be 1CFS and middle dam to be 20 CFS. Again this proposal from the applicant demonstrates a total disregard of impact to the community and the public at large. There is no fish way on the applicants dam and during long periods each year there is little or no water flow over the upper dam and limited flow below middle dam.
- b. Fish migrating from above the upper Dam during summer month have no means in which to gain access to a natural flowage channel. Fish subsequently migrate downstream are forced thru the turbines (they are pulverized)— no further explanation needed. Flows below middle dam could be reduced to levels that would be inadequate to maintain fishery sustainable habitat and water quality.
- c. Minimum flow levels should be accessed and approved that will provide natural flow migrate from above the upper dam to the lower pool and at the same time provide for sustainable habitat below middle dam.

Further the flow below middle dam should be great enough so there is no odor emitted from the exposed river bed.

Respectfully submitted

John M. Preble Resident Town of Rumford

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