

John M Preble, Rumford, ME.  
Mr. Ryan Hansen  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

FERC Docket p-2333-091

June 7, 2020

Dear Mr. Hansen,

I officially request that a formal Public Recreational Study Plan Focus Group be authorized and mandated for inclusion in the Final Recreational Study Plan to be completed for this Docket.

This requestor respectfully and with due cause believes that the creation of an independent Public Focus Group is necessary to assure that an objective recreational study evaluation is conducted and reflects the best interests of the Town of Rumford, residents, and visitors to the River Valley, nearby vicinities and the State of Maine.

Respectfully,

John M Preble  
Senior Vice President TD Bank - Retired  
Finance Director- Bank of Boston / Bank of America  
Director Mahoosuc Pathways  
Treasurer and Director Friends of Richardson Lake

Recreational Study Plan - Public Recreation Study Plan Focus Group (PFG)  
- Rumford Falls Hydro (RFH)

Brookfield's plan submission lacks sufficient detail or appropriate methodology to archive the goals of a comprehensive Recreational Study Plan. Brookfield is one of the world's largest owners and managers of renewal energy. Brookfield's staff has vast experience with and knowledge of the complex process of Hydro Licensing. Yet they chose to submit a Study Plan that FERC has sighted lacks the context necessary to complete an appropriate analysis to put forth reasonable Recreational and Scenic development opportunities. Brookfield chose not to incorporate public and agency material observations expressed by participants in the workshop held to solicit Study Plan recommendations. Additionally, in other similar applications in the State of Maine Brookfield has demonstrated an unreasonable reluctance to allow public access. "We will take it under consideration" has a whole new meaning. For those experienced with dealing with Brookfield it equates to: " when Hell freezes over "- while to the uninformed local governments ,Non-profits, and the general public it is met with false optimism ; only to be discovered after the licenses have been approved and the promises made have not materialized and or have been degraded from prior accessibility.

Brookfield's internal corporate bias precludes it from performing an objective Recreation Study Plan.

The Town of Rumford's Study Plan Request(s) endorses the establishment of a Public Focus Group but did not comment on specific roles and responsibilities.

This respondent contends that without such clearly defined roles and responsibilities the applicant could minimalize and or exclude substantive observations and request of the Public Focus Group.

To ensure objective input and evaluation FERC must mandate the creation of a Public Recreational Study Plan Focus Group (PRSPFG) with similar defined roles and responsibilities as put forth in this request.

#### 1) Goals and Objectives

The goal of this Public Recreation Study Plan Focus Group is to identify, inventory, and propose reasonable Recreation and Scenic access needs for determination by FERC as to which items are to be included in Rumford Falls Hydro's operating License. Furthermore, implementation to be completed within a reasonable timeline of license issuance. The License should also mandate that the Recreational Plan provides for on-going updates and enhancements as appropriate and complements the Town of Rumford's Comprehensive Recreation Plan and recreational desires of the River Valley vicinity.

#### 2) Study Area

The study area will include Lands denoted by the Project Boundary and the Project vicinity.

#### 3) Background and existing Information

##### Background

Hiking, biking, canoeing, boating, ATV/snowmobiling, fishing, public concerts, Tourist Information Center, scenic falls observation, Veterans Memorial, public gatherings, Rumford Community Housing outdoor access, fitness and wellness access by local residents and visiting tourist alike are just some of the many public uses of properties within the project boundary.

##### Existing Information - Existing Mandated

Current license has two mandates: 1) Creation of a boating Carry-in facility near the Carlton Bridge 2) a canoe Carry-in launch at Rumford Point which was never created and is a violation of the license requirement.

##### Existing RFH owned/ controlled sites

1. Falls trail - East shore upper Dam closed - historically allowed public access until Brookfield ownership
2. Scenic Observation Deck - west shore Falls Hill - historically allowed public access - closed with Brookfield ownership
3. Wheeler Island - up stream of Upper Dam - unimproved river island - rarely used - no physical improvements.

4. Logan - South Rumford Road - unimproved boat launch, fisheries access, winter skating
5. Boivin Park- at base of Falls Hill - public scenic observation site, tourist info center, picnic area / rest area - Maintained by Town of Rumford
6. Veterans Park - foot of Congress street - Veterans Memorial, public concert stand, benches and gardens maintained by Town of Rumford.
7. 7) Falls Hill ATV/ Snowmobile trail - East side of river - small section of trail is on RFH land - majority on land owned by the mill
8. Carlton Bridge boat carry-in launch - launch ramp accessible from street

Existing - non RFH sites

1. Hanover Boat Launch - improved ramp and parking accessible by car - Maintained by Mahoosuc Land Trust
2. Rumford Center Hastings Landing - improved canoe put-in - step landing and parking maintained by Mahoosuc Land trust
3. East Rumford Boat launch improved boat ramp and parking - maintained by Town of Rumford.
4. Citizen Park and walkway - west side of river between Bridge Street and Memorial Bridge - scenic walkway, benches and overlooks, local memorial seating - maintained by Town of Rumford
5. Scenic Library grounds - behind town Library - Maintained by Town-parking
6. White Water Surf Hole - downstream Memorial Bridge access via Library parking lot
7. White Water play a

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