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Via E-Filing

July 26, 2020

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE>
Washington, D.C. 20426

Subject: Rumford Falls Hydroelectric Project: FERC
Docket 2333-001 Revised Study Plan - Recreation Study Plan Comments

Dear Secretary Bose,

The respondent acknowledges that considerable enhancements have been included in the revised Recreation Study Plan submitted on July 8, 2020. Yet substantive adjustments are needed to add omissions improve effectiveness and completeness of input. Responses and comments to individual observations follow:

1.0 Goals and Objectives -

Observation: RFP failed to include the obvious - the creation of a Recreation Plan for current and future usage.

Comment: add the following:

- 1) Creation of a current and future potential Recreation Plan task including timeline and roles and responsibilities.
- 2) On-going process task to monitor progress and to periodically update Plan including roles and responsibilities for such tasks`

3.0 Background and existing information- in Rumford Falls Power LLC (RFP) latest submission Boating and fishing are stated as being the primary recreational uses.

Comments: The upper waterfalls are a key scenic draw and is viewed by thousands each spring to watch the powerful display of mother nature. The Rumford Falls are frequently a subject of TV media coverage during high flows. The Boivin Park is often filled to capacity to view the spectacle of the falls. Large numbers of individuals and family members stop daily to view the falls and to take photos passing thru Rumford. During summer and fall Boivin Park is a popular scenic viewing area especially when there are water flows over the upper dam and a frequently used rest stop, lunch and picnic area. This is in sharp contrast to RFP comment that recreation use is limited around the Middle Dam impoundment.

4.0 Project Nexus - RFP states "the results of this Study will be useful for the development of a recreation plan; which RFP is proposing to develop.

Comment: no where in RFP's submission is there a task that specifies rules and responsibilities for creation of a Recreation Plan that includes.

5.0 Methodology: RFP notes that the evaluation of the Rumford Falls Trail will be limited to the portion of trail that occurs on RFP Land - this is unacceptable - the condition of the entire Rumford Falls Trail needs to be evaluated and included in remediation projects.

5.0 Task 2 Characterizing Current Recreation Use and Future Demand of Recreation Facilities at the Project and within Project Vicinity. RFP intends to have members of the Focus group to spend one day visiting sites and then meeting that same day to discuss 'key recreational assets, different seasonal uses, historic and present uses, access, suitability for use of existing resources, and potential needs for rehabilitation and improvements". There are currently eleven sites to be evaluated. Some are in close proximity to others while others are more distant and require travel time. Site evaluations alone will take in excess a full day.

Comment: Task 2 is a critical element of the Recreation Study Plan and limiting this task to one day may not allow for adequate discovery and or discussion. No provision has been made to evaluate sites other than those identified in RFP plan submission nor is it apparent that the Focus Group has the freedom to identify additional sites within the Project or Project Vicinity for site evaluation and inclusion in the plan. The following changes need to be made to Task 2:

- 1) Focus Group should initially be convened in fall of 2020 to discuss merits and issues with the submitted listing of existing and future use sites. This input to be documented and used as individual site evaluation preview guide and whether technical evaluations and data will be required. The Focus Group should have the authority to put forth additional sites that would be added to the 2021 site evaluation and survey list, (example: trails on west and east banks of Swift River, Mt. Ziron trail head, downstream boat launches in Mexico and Dixfield etc.).
- 2) Site evaluation visits to be scheduled based on a reasonable estimate as to how long each evaluation is likely to take place allowing for a thorough inspection of each site. Transport time and time to regroup to be included in time estimate. Multiple evaluation and discussion days are to be scheduled as needed to complete the Task.
- 3) Evaluations that are dependent on professional assessments made by RFP and its agents are subject to second opinions at the discretion of the Focus Group and Town of Rumford. Agents and parties conducting any such second opinion evaluations to be selected by the Town of Rumford and or consensus of the Focus Group.
- 4) Multiple sites are currently closed by RFP stating safety and security concerns. It is obvious these sites will require technical evaluation.
- 5) Technical evaluations should be conducted, and Focus Group provided with findings prior to site visitation to aid in site review effectiveness and remediation recommendations.

Recreation Observations and recreation Facilities - RFP proposes a fixed list as presented:

Comment: Need to add additional sites as identified by Focus Group

Task 3 - Reporting -

Observation - there is no defined criteria or specificity for this task

Comment: At minimum the following should be reported for each site valuated.

- 1) Pros and cons for inclusion in Recreation Plan
- 2) Focus group comments and conclusions
- 3) Classification as currently actionable or future consideration

6.0 Schedule-

Comment: The entire proposed timeline needs to be changed to the following order:

- 1) Establish Focus group - Fall 2020
- 2) Focus group site discussion - documented pros, cons, issues for site evaluation Fall 2020
- 3) Identification of appropriate additional sites Fall 202
- 4) Identification to RFP of sites requiring technical evaluation Fall 2020
- 5) Completion of technical evaluation and report of details to Focus Group including RFP proposal regarding mitigation options Spring 2021
- 6) Identification of requested second opinions upon completion of item 5 above spring 2021
- 7) Complete second opinion evaluation summer 2021
- 8) Prepare report comparing first technical opinion vs second opinion summer 2021
- 9) Conduct site inspections summer 2021
- 10) Review Survey results with Focus Group Fall 201
- 11) Compose Recreation Plan fall 2021
 - a. Current Actionable -complete with Focus Group comments and observation
 - b. Future Recreation potential complete with Focus Group comments and observations
 - c. Establish Recreation Current Actionable Plan detail timeline

Respectfully Submitted

John M Preble

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