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OFFICE OF THE TOWN MANAGER

Mr. Ryan Hansen  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**VIA FERC SERVICE**

Reference: Docket Number: P-2333-091

July 28, 2020

Dear Mr. Hansen,

The Town of Rumford hereby responds to the submission of the applicant and specifically addresses their response to our request for a Whitewater Rafting Recreation Study. In effect the applicant's response conducts a safety and operational analysis that the Town has requested but does so on a summary basis as quoted below:

“RFH does not believe that whitewater activities are safe or commercially feasible at the Project for the reasons described below. The Town of Rumford places specific emphasis on use of the area by commercial whitewater outfitters (kayaker and rafters). However, the reach described is approximately one mile in length with only one relatively short rapid (Figures 4-2 and 4-3), providing a very limited opportunity that is unlikely to be economically viable as a commercial run. Nevertheless, the particular concern of using this reach in support of whitewater recreation is the public safety aspects given the Project's existing and likely future operations and the fact that the bypass reach, which is the primary river reach of interest for this study, serves as the spillway for the Lower Development. In addition, the steep and developed nature of this reach, including steep banks and gated and fenced private property, result in difficult access for potential boaters and rescue personnel.”

The Town believes that given the length of licensing that the proposal is worthy of in depth consideration beyond several concise paragraphs. Notably, the applicant delivers a judgment of commercial viability of the business proposal without including any supporting expert evidence or factual basis for such judgement. The applicant is not in the business of whitewater rafting nor are they a Registered Maine Guide with such experience nor do they quote or otherwise supply an opinion from such an expert.

The Town notes correspondence delivered to the docket from two Registered Maine Guides, Ms. Jennifer Deraspe of Denmark, Maine and Mr. Todd Papianou of Rumford giving their opinion of business viability in support of whitewater rafting or paddling opportunities. We believe these opinions constitute information from experts that is sufficient to support the contention that local professionals in the whitewater and paddling field believe the opportunity is economically viable and therefore worthy of study.

With regards to the restoration of the West Viewing Area and the aesthetic improvements at Veterans Park the Town notes that both of these areas were original project features whose design and construction was conducted by the Rumford Falls Power Company to which Rumford Falls Hydro is the successor in both title and operating rights. The chain link fencing found through the project is either on or at the boundary of the applicant's reservation and creates a blighted appearance in its current state. At present the applicant's effort to secure the public viewing area(s) constitutes only signage and coincidental surveillance either by facility staff or other means. The applicant's own actions, present security configuration, and allowance for occasional incidental or accidental public trespass appear to support the idea that the public can safely have access to the West Viewing area and the Rumford Falls Trail without creating a serious threat to public safety or security that would mandate removal of all public access or the use of more rigorous barriers.

While the Town understands the applicant's desire to maintain operations which are as operationally simple as possible, we believe that the Rumford Falls Hydro project is now long overdue for a substantial change in operational approach that better recognizes community recreational interests, fully appreciates the importance of public access, restores the integrity of the original historical features and gives the entire project the beautification that it needs and which the Town deserves.

With our gratitude for the Commission's continued regard for our Town,

Sincerely,



Stacy Carter

Town Manager

Rumford, Maine