

June 9, 2023

VIA E-FILING

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

**Subject: Rumford Falls Hydroelectric Project (FERC No. 2333-094)
Response to FERC Additional Information Request for the Recreation Study
Report**

Dear Secretary Bose:

Rumford Falls Hydro LLC (RFH), a subsidiary of Brookfield Renewable, herein files with the Federal Energy Regulatory Commission (FERC or Commission) its response to the Commission's additional information requests on the Recreation Study Report for the Rumford Falls Hydroelectric Project (FERC No. 2333) (Project). The Project, which consists of two discrete developments – the Upper Station Development and the Lower Station Development, is located on the Androscoggin River in the Town of Rumford, Oxford County, Maine. The Project's existing FERC license expires on September 30, 2024, and RFH is pursuing a new license for the Project through the Commission's Integrated Licensing Process.

On March 30, 2023, RFH filed the Recreation Study Report, Angler Creel Survey Report, and additional recreation protection, mitigation, and enhancement (PM&E) measures with the Commission. On May 11, 2023, the Commission issued a letter requesting additional information on the Recreation Study Report within 30 days from the date of the letter. RFH herein files the response to the Commission's additional information request. Additionally, in response to the Commission's requests, RFH made minor modifications to the recreation enhancement portion of the PM&E measures and herein files 1) Exhibit D, Section 4.6, Cost of Proposed Environmental Measures, and 2) Exhibit E, Section 4.2.4, Proposed Environmental Measures, which replace those that were previously filed by RFH on March 30, 2023.

In addition to filing this additional information with the Commission, RFH is distributing this letter to those on the enclosed distribution list. This submittal is also available electronically in FERC's eLibrary system at <https://elibrary.ferc.gov/idmws/search/fercensearch.asp> under docket number P-2333.

Rumford Falls Hydroelectric Project (FERC No. 2333)
Response to FERC Additional Information Request for the Recreation Study Report
June 9, 2023

If there are any questions or comments regarding this submittal, please contact me by phone at (207) 755-5613 or at luke.anderson@brookfieldrenewable.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Anderson', with a long horizontal flourish extending to the right.

Luke Anderson
Manager, Licensing
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cc: Distribution List
Attachment (1)

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Response to Additional Information Request
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Response to Additional Information Request
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Response to Additional Information Request
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Response to Additional Information Request
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**RESPONSE TO FERC ADDITIONAL INFORMATION
REQUEST**

Schedule A

Recreation Study Report – General

1. *There are no figures/maps included in the Recreation Study Report or the license application, that clearly depict the 15 recreation facilities surveyed in the study and land ownership. Figures 1 and 2 in the Recreation Study Report and Figures 5.10-1 and 5.10-2 in the license application are crowded and at a scale that makes it difficult to identify the individual recreation facilities and their features. Please provide separate figures, labeling amenities/recreation features and location markers such as street names, of the following recreation facilities: 1) the ATV Trail facility, clearly showing land ownership of the parking lot and trail segments; 2) the Maine Department of Agriculture, Conservation, and Forestry (Maine DACF) Mexico Boat Launch in the town of Mexico; 3) the Chisholm Park, Trail, and Overlook; 4) J. Eugene Boivin Park; 5) the West Viewing Area; 6) Rumford Falls Trail, including the two access ends of the trail and land ownership; and, 7) the Logan Brook Access.*

Response: In response to the Federal Energy Regulatory Commission’s (FERC or Commission) request, Rumford Falls Hydro LLC (RFH) has developed separate figures with amenities/recreation features for 1) the ATV Trail, which also shows land ownership of the parking lot and trail segments¹; 2) the Maine Department of Agriculture, Conservation, and Forestry (MDACF) Boat Launch in Mexico; 3) the Chisholm Park, Trail, and Overlook; 4) J. Eugene Boivin Park; 5) the West Viewing Area; 6) Rumford Falls Trail including the two access ends of the trail and land ownership; and, 7) the Logan Brook Access. Please see Figures 1 through 7 in Appendix A to this Additional Information Request (AIR) response. It should be noted that figures depicting facilities with extensive amenities (i.e., J. Eugene Boivin Park) only depict the major amenities given the density of amenities in one area. Smaller amenities such as picnic tables and trash cans are not depicted given that the location of these amenities change. However, photographs depicting these smaller amenities at the recreation facilities are included in Attachment 5 of the Recreation Study Report filed with FERC on March 30, 2023.

2. *The Recreation Study Report does not include information on how many users visited the individual recreation sites on which days of the week. This data would provide information on when sites were most popular during which months of the recreation season and during weekends versus weekdays. Please summarize how many users visited each recreation site by month and weekday/weekend. This information should be available from the spot count forms but it is difficult for us to decipher due to legibility.*

¹ As stated in the Recreation Study Report, RFH assessed the portion of the ATV trail adjacent to South Rumford Road and Route 2. Due to the extensive nature of the trail system, much of which occurs on private property secured through landowner permission, RFH did not map the trail system in the Project vicinity in its entirety, but identified the trail segments within the assessed recreation facilities,

Response: To confirm, RFH included the total number of visitors observed on each observation day for all recreation facilities and the percentage of the total number of visitors observed at each recreation facility during the study in Figure 3 and Figure 4 of the Recreation Study Report, respectively. Additionally, RFH provided the maximum daily and average daily number of people observed at each recreation facility in Figure 5 in the Recreation Study Report.

In response to the Commission's request, RFH is providing information on how many users visited the individual recreation sites on which days of the week in Table 1 in Appendix B of this AIR response. Table 1 presents the total number of visitors observed for each recreation site by month and day type (i.e., holiday, weekday, or weekend). Of the 884 visitors observed across all 20 spot count days, 148 visitors (16.7%) were identified on a holiday, 259 visitors (29.3%) were identified on a weekday, and 477 visitors (54.0%) were identified on the weekend. The number of visitors observed were similar between months. There were 179 visitors (20.2%) observed in May, 149 visitors (16.9%) observed in June, 187 visitors (21.2%) observed in July, 216 visitors (24.4%) observed in August, and 153 visitors (17.3%) observed in September at the recreation sites.

3. *The Recreation Study Report does not describe the most popular recreation activities conducted at each site. The report only describes the most popular recreation activities observed for the Rumford Information Center/J. Eugene Boivin Park and the Maine DACF Boat Launch. Please provide information on the most popular recreation activities conducted/observed for each site in the survey (excluding Wheeler Island), using information from both the in-person and online survey data.*

Response: Figure 7 in the Recreation Study Report provided the activities survey respondents indicated they participated in during their visit. RFH also provided a summary of the recreational activities observed during spot counts at all sites in Table 17 of the Recreation Study Report.

In response to the Commission's request, RFH is providing additional information on the most popular recreation activities conducted/observed for each site in the survey (excluding Wheeler Island), using information from both in-person and online survey data in Appendix B of this AIR response. Table 2 in Appendix B of this AIR response provides a summary of the total number of survey respondents (in-person and online) that participated in common recreational activities at each recreation site. Three recreation sites only had one respondent for each activity performed: the ATV Trail (dog walking and off-road vehicle riding), Carry-in Launch (Carlton Street) (bank/wading fishing, picnicking, and other activities), and the MDACF Boat Launch in Mexico (bank/wading fishing). At Veteran's Park, three activities had equal participation (picnicking, relaxing, and walking). Walking was the most popular recreation activity at Chisolm Overlook/Park and Trail and Rumford Falls Trail, while hiking was the most common activity recorded at the Hastings Boat Launch. At the Hanover Boat Launch, boat fishing was the

most popular activity, and canoeing was the most popular activity at the Logan Brook Access. Relaxing was the most popular activity at the MDACF Boat Launch in Rumford and Rumford Information Center/J. Eugene Boivin Park.

Table 3 in Appendix B of this AIR response includes the recreational activities observed during spot counts at each recreation site. The number of activities recorded at sites ranged from one activity at Logan Brook Access to 262 activities at the Rumford Information Center/J. Eugene Boivin Park. Hiking/walking was the most popular activity at the Carry-in Boat Launch, Chisholm Overlook/Park and Trail, Hastings Boat Launch, Rumford Falls Trail, and Veteran's Park. At the Carry-In Boat Launch, riding off-road vehicles was also a relatively popular observed activity. At the Hastings Boat Launch, boating was also a relatively popular observed activity. At the Rumford Information Center/J. Eugene Boivin Park, the most popular activity was remaining in the car and hiking/walking. Riding off-road vehicles was the most popular activity at the ATV Trail and the MDACF Boat Launch in Mexico. Boating was the most popular activity at the Hanover Boat Launch and the only activity observed at the Logan Brook Access. At the MDACF Boat Launch in Rumford, although sporting related activities were the most popular activity, it was primarily comprised of participants of the Androscoggin River Watershed Council (ARWC) Adventure Race. Other popular activities at the MDACF Boat Launch in Rumford included remaining in the car, boating, and picnicking.

River Access and Portage

4. *Our October 31, 2022, additional information request asked for more information on access points from which the data was collected for the FERC Form 80 and the location of the portage. In your March 5, 2023, response you state that "RFH has not been able to locate additional records to further clarify access points", but that RFH would "include any pertinent information to address FERC's request in the pending recreation report." The Recreation Report still does not describe the portage around the Upper and Middle dams; please include a map showing where/how boaters currently egress the Androscoggin River before the boat barrier, the portage around the dam, and where they re-enter the river. Please describe the length of the portage.*

Response: RFH was not able to locate additional information to provide clarification on the access points where data was collected for the 2014 FERC Form 80 for the Recreation Study Report. The portage around the Rumford Falls Hydroelectric Project (Project) occurs primarily via Route 2 from the MDACF Boat Launch in Rumford approximately 3.6 miles to the Carry-in Launch (Carlton Bridge) or alternatively, approximately 3.9 miles to the MDACF Boat Launch in Mexico. The portage is depicted in Figure 8 in Appendix A of this AIR response. RFH notes although Figure 8 identifies put-in and take-out locations, all the access areas referenced in the figure can be used as put-in or take-out areas. These sites are described in the Recreation Study Report and have ample parking and low usage to allow for accessible portage around the: 1) safety buoy line in the Upper Dam impoundment; 2) Upper Dam and Upper Dam bypass reach

falls (also known as Rumford Falls); 3) the relatively small, approximately 21-acre Middle Dam impoundment; and 4) the 1.1-mile-long, fairly steep² Middle Dam bypass reach, which depending on flows, can have whitewater Class IV and Class V rapids. Collectively, from the safety buoy line in the Upper Dam impoundment to the end of the Middle Dam bypass is approximately 1.7 river miles. As shown on Figure 1 in the Recreation Study Report, in addition to the aforementioned boat launches, there is also the Hanover Boat Launch, Hastings Boat Launch, and the informal Logan Brook Access, which provides recreational users multiple options for accessing this reach of the Androscoggin River. More formal river access may also be available via steps from behind the Rumford Public Library as proposed in the additional recreation enhancement portion of the protection, mitigation, and enhancement (PM&E) measures RFH filed with the Commission on March 30, 2023. This access and/or steps will allow boaters to formally access the Middle Dam bypass reach below the Class IV and Class V rapids.

The recreational user survey component of the Recreation Study discussed watercraft usage. Of the 98 surveyed respondents, approximately 41.5 percent have not used a motorized or hand-carried watercraft to access the Androscoggin River. Approximately 44.7 percent of survey respondents have used a hand-carried watercraft, 8.5 percent of survey respondents used motorized watercrafts, and 5.3 percent of survey respondents used both hand-carried and motorized watercraft. For those who have utilized a motorized watercraft to access the river, only 3.3 percent of respondents indicated they have experienced difficulty with river access. For those who have used a hand-carried watercraft, only 5.4 percent of respondents indicated they have experienced difficulty with river access.

Carlton Street Bridge Carry-in Launch

5. *Section 4.1.4 of the license application lists existing environmental measures, which includes, “maintaining the existing FERC-approved recreation facility at the project (i.e., carry-in canoe facility at the Carlton Bridge),” and “provide for public uses and access to project lands and waters.” You do not explicitly state in the license application or the supplemental Recreation Study Report if you propose to continue to implement these measures in a new license. Please confirm that you plan to continue these recreation-related environmental measures, and if so, please estimate how much it costs annually to maintain the carry-in canoe facility at the Carlton Bridge.*

Response: Consistent with Section 4.1.4 of the Final License Application (FLA), RFH proposes to continue to maintain the existing FERC-approved recreation facility at the

² As stated in the Whitewater Boating Study Report, which was filed with FERC in the Updated Study Report on August 5, 2022, this reach drops in elevation from 479 feet above mean sea level (msl) to 423 feet above msl over approximately 0.5 river miles (downstream of Middle Dam to Lower Station powerhouse) or 3,121 feet, with a river gradient of 1.8 percent (94.9 feet per mile). Downstream of the Lower Station powerhouse, and for the remainder of the reach, the river has a more gradual slope.

Project [i.e., Carry-In Launch (Carlton Bridge)] and provide for public uses and access to Project lands and waters. As part of this AIR response, RFH revised, as appropriate, the recreation enhancement portion of the PM&E measures to reflect this and to include the estimated annual costs to maintain the Carry-In Launch in: 1) Exhibit D, Section 4.6, Cost of Proposed Environmental Measures, and 2) Exhibit E, Section 4.2.4, Proposed Environmental Measures in Appendix C and D, respectively, of this AIR response, which replace those that were previously filed with the Commission on March 30, 2023.

Mexico Boat Launch

6. *Table 3 of Section 5.1.3 of the Recreation Study Report states that the Mexico boat launch has 3 delineated standard size parking spaces for boat trailers and 19 delineated standard size vehicle parking spaces. The Stakeholder Site Visit Summary Notes presented in Attachment 8 states that potential improvements to the Mexico boat launch include, “improved signage from Route 2 identifying the site and additional parking along the road(?)” To help us understand visitor concerns, please include a photo and a map or other description of the location of the current access signage from Route 2 identifying the Mexico boat launch and, if possible, based on your meeting notes, why stakeholders felt the Mexico boat launch might need additional parking.*

Response: To confirm, Attachment 8 of the Recreation Study Report provides summary tables of the stakeholder site visit notes. The MDACF Boat Launch in Mexico is owned and maintained by the Town of Mexico and the State of Maine. There are three delineated, standard-size parking spaces for vehicles with boat trailers and 19 delineated, standard-size vehicle only parking spaces (please refer to Photo 1 and 2 in Appendix E of this AIR response). Over the course of the Recreation Study, the average number of people noted at the facility were five. The recreational user survey component of the Recreation Study overwhelmingly found the parking to be in the totally acceptable, acceptable, and neutral range. Only one respondent noted parking at the MDACF Boat Launch in Mexico to be completely unacceptable. The survey responses and responses of all of the other stakeholders during the site visit, with the exception of one stakeholder, indicated that adequate parking exists at the MDACF Boat Launch in Mexico and that roadside parking would not be needed. Given the aforementioned survey results and stakeholder feedback, it is possible that the one stakeholder comment regarding additional parking along the road was an error or inadvertently noted as it pertains to this location.

The MDACF Boat Launch in Mexico is accessed by Riverside Avenue in Mexico. Figure 2 in Appendix A of this AIR response depicts access and Figure 14 in Attachment 5 of the Recreation Study Report shows the signage at the site. There is limited signage (e.g., one small sign for Androscoggin River Trail Access) for the boat launch along Main Street (Route 2); therefore, the stakeholders present during the Stakeholder Site Visit during the Recreation Study noted a potential need for additional signage.

West Viewing Area

7. *You propose to re-open the West Viewing Area with several improvements, including installing/constructing fencing, a parking area, an educational kiosk, walking access along the Upper Station powerhouse driveway, picnic tables, a bench, making repairs to existing features such as the concrete deck and railing, relocating lights, and removing existing chain link fencing and gates. We need additional information on the proposed improvements to assess their benefits and costs. You estimate that all these improvements would have a capital cost of \$175,000. To better understand the basis of your cost estimates, please provide itemized costs of each of the proposed improvements at the West Viewing Area and any assumptions made in developing your costs (e.g, size of the parking area and substrate).*

Response: Recreational enhancements related to the Rumford Falls Trail are described in Attachment D (License Application, Exhibit E – Section 4.2.4, Proposed Environmental Measures) of RFH’s March 30, 2023 filing of the Recreation Study Report, Angler Creel Survey Report, and Additional Protection, Mitigation, and Enhancement Measures. In response to the Commission’s request, the itemized estimated costs and assumptions for the West Viewing Area are presented in the table below. As provided in Appendix C of this filing, the annual maintenance of this site is estimated to be \$2,000 annually.

Recreation Enhancements – West Viewing Area	Capital Cost (2023 dollars)
<ul style="list-style-type: none"> Patch and repair existing concrete surfaces on deck and railing where appropriate 	\$15,000
<ul style="list-style-type: none"> Relocate the lights that illuminate the falls and mount to foreside of existing concrete railing for public safety and aesthetic purposes 	\$5,000
Fencing	
<ul style="list-style-type: none"> Remove existing chain link fencing and gates around perimeter of the West Viewing Area Install where feasible, segment of chain link public safety fencing below the West Viewing Area deck for public safety purposes and below the line of site from the viewing area to the falls and Middle Dam impoundment. 	\$45,000
<ul style="list-style-type: none"> Install aluminum ornate fencing similar to the fence at the Town of Rumford’s J. Eugene Boivin Park, from an area just adjacent to the West Viewing Area along the top of the steep river embankment for public safety, leaving the grass viewing area open to the public. 	\$35,000
<ul style="list-style-type: none"> Install wooden guard rail at employee parking area where fence will be removed and limited repairs of existing staircase to West Viewing Area 	\$5,000

Recreation Enhancements – West Viewing Area	Capital Cost (2023 dollars)
Public Parking	
<ul style="list-style-type: none"> • Create a new gravel parking area for four vehicles, including one ADA and install wooden vehicle guard rail along the front of parking spaces and ADA compliant path from ADA parking space to West Viewing area 	\$35,000
<ul style="list-style-type: none"> • Drainage improvements to existing access road for the parking area 	\$25,000
Access	
<ul style="list-style-type: none"> • Provide designated pedestrian access along the existing Upper Station powerhouse driveway, which can be accessed from J. Eugene Boivin Park via the public sidewalk on Route 2 	\$5,000
Other Amenities	
<ul style="list-style-type: none"> • Install Project history kiosk, two picnic tables, and one bench 	\$5,000
TOTAL	\$175,000

8. *You propose to provide a “dedicated walking access along the existing Upper Station powerhouse driveway, which can be accessed from J. Eugene Boivin Park via the public sidewalk on Route 2.” We understand that you intend to further develop these details after licensing, but to evaluate the need and benefits of the access improvements please describe the proposed walking access, including where the access will start and end, the anticipated location of the path, the purpose/need of the walking access, and the anticipated materials to be used for the walking access (dirt, pavement, etc).*

Response: Recreational enhancements related to the West Viewing Area are described in Attachment D (License Application, Exhibit E – Section 4.2.4, Proposed Environmental Measures) of RFH’s March 30, 2023 filing of the Recreation Study Report, Angler Creel Survey Report, and Additional Protection, Mitigation, and Enhancement Measures. RFH proposes to provide a dedicated pedestrian access along the existing Upper Station powerhouse driveway, which can be accessed from J. Eugene Boivin Park via the existing public pedestrian sidewalk along Prospect Avenue/Route 2. It is an approximately 600-foot-long walk from J. Eugene Boivin Park along the existing pedestrian sidewalk on Prospect Avenue/Route 2 to the Upper Station powerhouse driveway (please refer to Figure 9 in Appendix A and Photos 3 and 4 in Appendix E of this AIR response). The dedicated pedestrian access along the Upper Station powerhouse driveway to the proposed parking area at the West Viewing Area is approximately 740 feet long and the asphalted portion is approximately 16 feet wide. As noted, this access is currently paved (please refer to Photos 5 and 6 in Appendix E of this AIR response). RFH proposes to paint the eastern side of the driveway as a designated 4-foot-wide pedestrian lane to the proposed public gravel parking lot and West Viewing Area. RFH will install an access sign and stop sign at the entrance to the Upper Station powerhouse driveway. An additional stop sign will be placed adjacent to the proposed gravel parking

area. These stop signs will allow for single lane vehicle traffic along the Upper Station powerhouse driveway to the proposed parking area. This designated pedestrian access will allow for those visiting Rumford Information Center/J. Eugene Boivin Park or other recreational users the opportunity of a short walk to the West Viewing Area, as opposed to driving to the facility. Figure 9 in Appendix A of this AIR response depicts the proposed dedicated pedestrian access.

9. *You propose to install an 8-foot-high black aluminum fence, like the fence at J. Eugene Boivin Park. To better picture the material and appearance of the proposed fencing, please provide a photo of the existing fence at J. Eugene Boivin Park. You state that fencing will be installed from an “area just adjacent to the West Viewing Area along the top of the steep river embankment for public safety.” Will this fencing block any viewpoints from the open grass viewing area or the parking lot, or have any impacts to the viewshed? What is the safety concern in this area and why is this fence being installed? Is there currently any structure, such as a rock wall, that exists to block the public from the embankment?*

Response: Recreational enhancements related to the West Viewing Area are described in Attachment D (License Application, Exhibit E – Section 4.2.4, Proposed Environmental Measures) of RFH’s March 30, 2023 filing of the Recreation Study Report, Angler Creel Survey Report, and Additional Protection, Mitigation, and Enhancement Measures. The location of both the proposed ornate and public fencing are shown in Figure 9 in Appendix A of this AIR response. The West Viewing Area has an existing concrete banister and overlook wall (approximately 3.6 feet high) that blocks the public from the embankment (please refer to Figure 71 in the Recreation Study Report), however, RFH believes additional public safety fencing is necessary (below the banister and out of the line of site from the West Viewing Area to the falls) given the steep river embankment in this area with slopes ranging between 60 to 80 percent and a vertical drop of approximately 40 feet. There is no existing rock wall or other structure along the approximate 80-foot-long open area adjacent to the West Viewing Area along the top of the steep river embankment where RFH is proposing 8-foot-high ornate aluminum fencing (please refer to Photo 7 in Appendix E of this AIR response). The proposed ornate fencing will not block views of the falls from the grassy area or the parking areas. Views of the Middle Dam impoundment and downtown Rumford will only be partially obstructed given the spacing of the vertical fencing (standard or common clear spacing will be approximately 4 inches). The Middle Dam impoundment and downtown Rumford can also be viewed from the overlook at the West Viewing Area. During the stakeholder site visit held on August 19, 2022, stakeholders recognized the need for fencing and requested fencing types that were more aesthetically pleasing, as documented in the Recreation Site Visit and Focus Group Discussion Summary filed with the Recreation Report. Therefore, RFH proposes to use the ornate aluminum fencing similar to the fencing used at J. Eugene Boivin Park (please refer to Figure 27 in Attachment 5 of the Recreation Study Report) and also the same at the West Viewing Area (please refer to Photo 8 in Appendix E of this AIR response). As described above, the public safety

fencing will be installed below the overlook and out of the line of site of the falls. If the proposed public safety fencing is not feasible below the West Viewing Area, the existing concrete railing may need to be amended (with similar ornate fencing further amended with viewing portholes or clear spacing) to address safety concerns.

10. *You propose a dedicated public gravel parking area for four vehicles and access from the parking area to the viewing area. You state that the fourth parking space, closest to the viewing area, will be a dedicated American Disabilities Act (ADA) parking space. Will the access from the parking space to the viewing area also be accessible for persons with disabilities?*

Response: Recreational enhancements related to the West Viewing Area are described in Attachment D (License Application, Exhibit E – Section 4.2.4, Proposed Environmental Measures) of RFH’s March 30, 2023 filing of the Recreation Study Report, Angler Creel Survey Report, and Additional Protection, Mitigation, and Enhancement Measures. In response to the Commission’s request, RFH developed Figure 9 in Appendix A in this AIR response which depicts the proposed enhancement measures. The fourth parking space closest to the overlook will be a designated ADA space (approximately 16 feet by 25 feet) and will be marked accordingly. An ADA-compliant, approximately 4-foot-wide and 195-foot-long path of crushed shale or other comparable material will extend from the parking area to the overlook with minimal slope to comply with ADA requirements.

11. *Section 5.18 (b)(5)(ii)(C) of the Commission’s regulations requires that an applicant include its reasons, based on project-specific information, for not adopting a preliminary environmental measure proposed by a resource agency, Indian tribe, or member of the public. Attachment 7 of the Recreation Study Report includes stakeholder correspondence from a focus group member that recommends trail access be established from the Rumford Falls Information Center or J. Eugene Boivin Park to the West Viewing Area. The focus group member recommends this trail be established as a safer and more enjoyable opportunity than accessing the West Viewing Area via the public sidewalk on Route 2 that Rumford Falls Hydro proposes. Please provide your reasoning for not adopting this preliminary environmental measure. Are there other options for providing the requested access and how much would they cost?*

Response: RFH has reviewed the stakeholder recommendation related to establishing a trail along the river embankment from J. Eugene Boivin Park to the West Viewing Area. As discussed further below, the location of the stakeholder proposed trail would run parallel to, and only a short distance from, RFH’s proposed designated pedestrian access to the West Viewing Area (please refer to Figure 9 in Appendix A of this AIR response). The stakeholder proposed access is currently not used by nor is it safe for public access as a recreational trail. To develop the site for public use including preparation to safely access the proposed route for construction workers and equipment, would require significant earthwork prior to further developing the trail for public use. The embankment

in this area is generally greater than an estimated 60 percent slope with some areas ranging up to an estimated 80 percent slope (please refer to Photos 9 and 10 in Appendix E of this AIR response). Initial preliminary earthwork and development estimates based on a conceptual trail ranges between \$900,000 and \$1,200,000. This range of costs does not include potential additional costs related towards understanding and addressing drainage or stormwater issues. Further, it is currently unknown what additional requirements would be needed to stabilize embankments above and below the requested route, including an existing boulder retaining wall along the embankment below the Upper Station powerhouse driveway (please refer to Photo 11 in Appendix E of this AIR response). Finally, any modifications to the boulder retaining wall would have to consider the potential to compromise the integrity of the Upper Station powerhouse driveway. Collectively, these additional issues make the stakeholder proposed trail access potentially less feasible and even more cost prohibitive.

Please note the stakeholder provided photo (please refer to the last photo in Attachment 7 of the Recreation Study Report) is of a relatively wide area and gentle slope and does not account for the majority of the proposed access which includes natural drainage areas, rocks, boulders, difficult terrain with changes in elevation and grade, areas of steep slopes along the embankment of the Middle Dam impoundment, and trees routed in the shoreline areas and slopes (please refer to Photo 9, 10, and 12 in Appendix E of this AIR response). The stakeholder proposed route from J. Eugene Boivin Park to avoid the approximate 600-foot-long existing public pedestrian sidewalk on Prospect Avenue/Route 2, would also require a seasonal foot bridge to cross Bean Brook, which receives significant flows and debris during storm events and spring runoff.

Rather, RFH has proposed the only other option which is to provide dedicated pedestrian access along the existing Upper Station powerhouse driveway, which can be accessed from J. Eugene Boivin Park via the existing pedestrian sidewalk along Prospect Avenue/Route 2. Users of the proposed dedicated pedestrian access would be on a pedestrian sidewalk on Prospect Avenue/Route 2 for only approximately 600 feet, at which point, the powerhouse driveway is accessible and is below a steep embankment which blocks the noise and view of Prospect Avenue/Route 2 (please see Photo 6, 13 and 14 of Appendix E in this AIR response) while still providing limited views of the Middle Dam impoundment through the forested area during full foliage. The existing pavement of the proposed dedicated pedestrian access area includes existing operational access lighting (see Photos 6 and 14 of Appendix E in this AIR response) and is relatively flat with gentle grades, which is more accessible to all abilities and is safer since it avoids the steep embankments adjacent to the Middle Dam impoundment.

12. *You propose to provide public access at the West Viewing Area from April 15th to October 31st annually from dawn until dusk. You propose to “provide flood lighting of the falls at the upper station at river flows greater than 6,000 cfs between 8 pm – 12 am year-round.” You also propose to relocate the existing lights that currently illuminate the falls and mount them to the inside of the existing concrete railing for public safety and*

aesthetic purposes. Are these separate lighting features, or the same? If separate, where exactly will the flood lighting be located at the upper station? Will the lighting being mounted to the inside of the existing concrete railing still illuminate the falls? What are the public safety concerns and aesthetic purposes associated with relocating these lights? Will there be any lights provided at the West Viewing Area to provide light for the facility itself, and if so, what hours will those lights be in operation? Are there concerns (safety, operational, etc.) that would affect your ability to keep the West Viewing Area open year-round and during nighttime hours?

Response: The “flood lights” are the existing spotlights that currently illuminate the falls, which are shown in Photo 8 in Appendix E of this AIR response. As specified in the March 6, 2023 AIR response, RFH does not propose installing new lighting at the Project. RFH proposes to relocate the existing spotlights that illuminate the falls and mount them to the inside, as opposed to the top of, the existing concrete banister for public safety and aesthetic purposes. The relocation of the existing spotlights also aids in eliminating public safety issues related to electrical conduits and the lighting equipment. RFH is also proposing to relocate the spotlights for aesthetic purposes because the spotlights are not fully consistent with the character of this site and can slightly block the view of the falls. For general lighting, the existing decorative light poles along the Upper Station powerhouse driveway will remain and provide general lighting for the facility, however, public access will be provided dawn to dusk (natural daylight hours).

RFH is proposing to continue to use this lighting to illuminate the falls and, as stated in RFH’s FLA and clarified in the March 6, 2023 AIR response, RFH proposes to expand the range of flows that would be illuminated, and as opposed to operating the lights at flows greater than 7,500 cubic feet per second (cfs), RFH is proposing to operate the lights at flows greater than 6,000 cfs between 8 pm and 12 am year-round.

RFH is currently proposing to provide public access from April 15th to October 31st, dawn to dusk, consistent with months and hours of operation at the Town of Rumford’s J. Eugene Boivin Park. RFH has safety concerns with having the West Viewing Area open year-round and during nighttime hours. Specifically, RFH is concerned that due to the location of the West Viewing Area, and its proximity to the river and Project’s tailrace, snow and ice removal and management would prove very difficult, particularly during heavy snow fall and icing that may occur due to mist from the falls at higher river flows during the colder months. RFH also has some security concerns with having the West Viewing Area open during nighttime hours due to the proximity of the site to the Upper Station powerhouse. The unique features of the West Viewing Area identified by study participants during the Recreation Study, were the views of Rumford Falls, Middle Dam impoundment, downtown Rumford, and Black Mountain, which would be limited during the nighttime hours. Finally, participants during the Recreation Study did not request this site be opened at nighttime.

Rumford Falls Trail

13. *You propose to, “obtain an easement for the license term for the relatively short segment of land along the middle segment of the alternate trail, which is owned by ND Paper, prior to the expiration of the current access agreement (the current agreement may be extended by mutual agreement and expires in November of 2026).” Attachment 6 of the Recreation Study Report includes a figure of the Rumford Falls Trail with an inset map that shows that the majority of the Alternate Trail, including the Overlook location, is outside of the project boundary. Based on the information in the record, we cannot determine the location and extent of the “short segment of land” owned by ND Paper, or who owns the land along the remaining portions of the alternate trail. Please provide a map showing ownership and describe the land ownership along the Alternate Trail.*

Response: The Rumford Falls Trail is a trail through the Project area, which connects to public roadways (Bridge Street/Route 108 and South Rumford Road). RFH constructed the alternate trail in the spring of 2022, which runs parallel to the portion of the existing trail that is closed due to public safety concerns and allows residents and visitors to complete the Rumford loop with views of Rumford Falls.

As requested by the Commission, Figure 6 in Appendix A to this AIR response includes a map showing ownership along the Rumford Falls Trail. The most recent available land ownership data for this area indicated Rumford Paper Company (known now as and referred to hereafter as ND Paper) owns an approximate 460-foot-long portion of the trail extending north from South Rumford Road to the alternate trail. The alternate trail, which is approximately 1,200 feet long is on land owned by Central Maine Power (CMP), ND Paper, and RFH. Starting at the south end of the alternate trail, approximately 410 feet is on CMP-owned land, approximately 570 feet is on ND Paper-owned land, and approximately 220 feet is on RFH-owned land. The approximate 1,770-foot-long portion of Rumford Trails that extends north of the alternate trail is owned by RFH and then ND Paper owns the north portion of the trail that connects to Bridge Street/Route 108.

RFH has an access agreement with ND Paper for the use of the alternate trail that is on their land, which expires in November 2026 and may be extended by mutual agreement. RFH proposes to obtain an easement for the license term for the relatively short segment of land along the alternate trail, which is owned by ND Paper, prior to the expiration of the current access agreement.

As mentioned above, a small portion of the alternate trail is on land owned by CMP. CMP has a recreational use policy stating their corridors are generally open to the public for a variety of non-motorized recreational activities. This portion of the trail has been available and utilized by the public for walking and bicycling activities historically.

14. *You also propose several improvements to the Rumford Falls Trail, including installing/constructing a bench, an educational kiosk, signage at both entrances with trail*

maps, a swing gate or removable bollard to prohibit unauthorized vehicles and to allow pedestrian access, wood crib steps to the steep portions of the alternate trail; improving trail bed material; enhancing and maintaining the alternate trail segment; maintaining segments of the existing Rumford Falls Trail, and providing access year-round with snow removal. We need additional information on the proposed improvements to assess their benefits and costs. You estimate that all these improvements would have a capital cost of \$65,000. To better understand the basis of your cost estimates, please provide itemized costs for each of the proposed improvements along the Rumford Falls Trail. Please include any assumptions made in developing your costs.

Response: Recreational enhancements related to the Rumford Falls Trail are described in Attachment D (License Application, Exhibit E – Section 4.2.4, Proposed Environmental Measures) of RFH’s March 30, 2023 filing of the Recreation Study Report, Angler Creel Survey Report, and Additional Protection, Mitigation, and Enhancement Measures. In response to the Commission’s request, these itemized costs and assumptions for the enhancements to the Rumford Falls Trail are presented in the table below. As provided in Appendix C of this filing, annual maintenance of this site is estimated to be \$4,000. Figure 10 in Appendix A of this AIR response identifies the proposed enhancements for the Rumford Falls Trail.

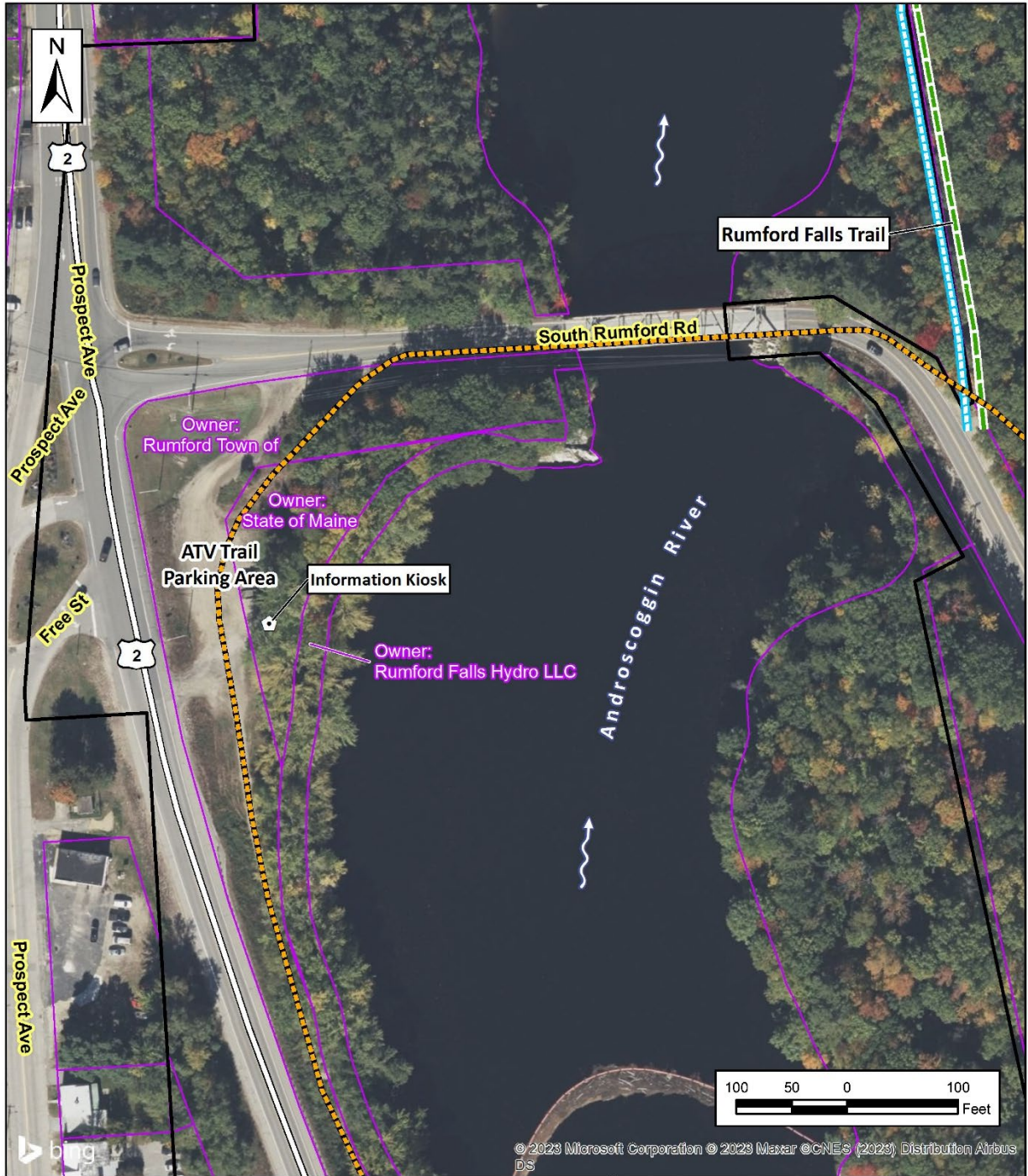
Recreation Enhancements – Rumford Falls Trail	Capital Cost (2023 dollars)
Trail materials; Erosion control and access	
<ul style="list-style-type: none"> • Improve trail bed material to make firmer and where appropriate and add wooden crib steps to the steep portions of the alternate trail 	\$58,000
Fencing	
<ul style="list-style-type: none"> • Install a removable bollard or swing gate to prohibit unauthorized vehicles from driving on to the elevated segment of the alternate trail and to allow pedestrian access 	\$2,000
Other Amenities	
<ul style="list-style-type: none"> • Install a bench and kiosk with information about the history of the Project at the falls overlook and add signage at both entrances with a trail map 	\$5,000
TOTAL	\$65,000 ¹

¹ This total does not include any potential cost for access easement (TBD).

RFH notes the additional PM&E measures provided in RFH’s March 30, 2023 filing, as modified in Appendix C and D in this AIR response, proposes to “provide access year-round, dawn to dusk, with snow removal or snow management limited to the service road from Route 108 and South Rumford Road needed for RFH employee access and Project operations.” Snow removal will be limited to the service or earthen access road necessary (please refer to Figure 6 in Appendix A of this AIR response) for RFH employee access and Project operations.

APPENDIX A
RECREATION FACILITY FIGURES

**FIGURE 1
ATV TRAIL**



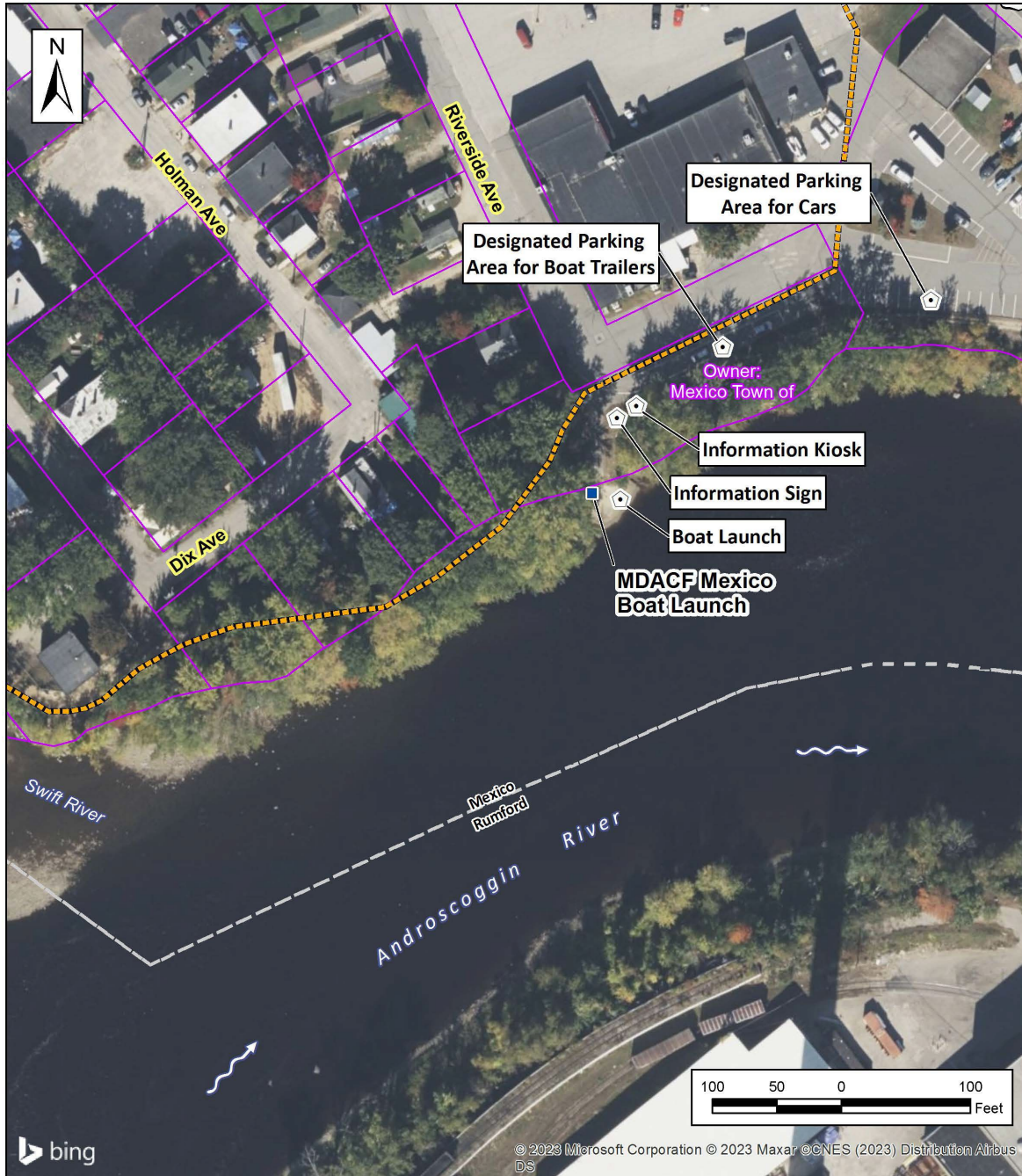
	Amenity		Existing Project Boundary
	ATV Trail		Parcel Boundary
	Employee Access to Project Facilities		U.S. Route
	Existing Trail		

Note: For Recreation Study observations, RFH observed from the portion of the ATV Trail adjacent to S. Rumford Road (US-2) in the proximity of the parking area.

Rumford Falls Project FERC No. 2333 ATV Trail Facility
Map Information was compiled from the best available free sources. No warranty is made for its accuracy and completeness.
Prepared by: HDR Engineering, Inc. June 2023

Document Path: N:\GIS2\Projects\BPNY\1017\5585_RF_Rumford_Falls_Releasings\Map_Docs\Final\map_9_5X11P_20230609_ATV_Trail_Facility.mxd

FIGURE 2
MAINE DEPARTMENT OF AGRICULTURE, CONSERVATION, AND FORESTRY BOAT LAUNCH IN MEXICO



Legend

- Amenity
- Non-RFH
- Municipal Boundary
- ATV Trail
- Parcel Boundary

Note: Tax records not available from the Town of Mexico for the MDACF boat Launch. Property lines displayed were developed from map sheet 20 of the Town of Mexico tax maps.

Rumford Falls Project
FERC No. 2333

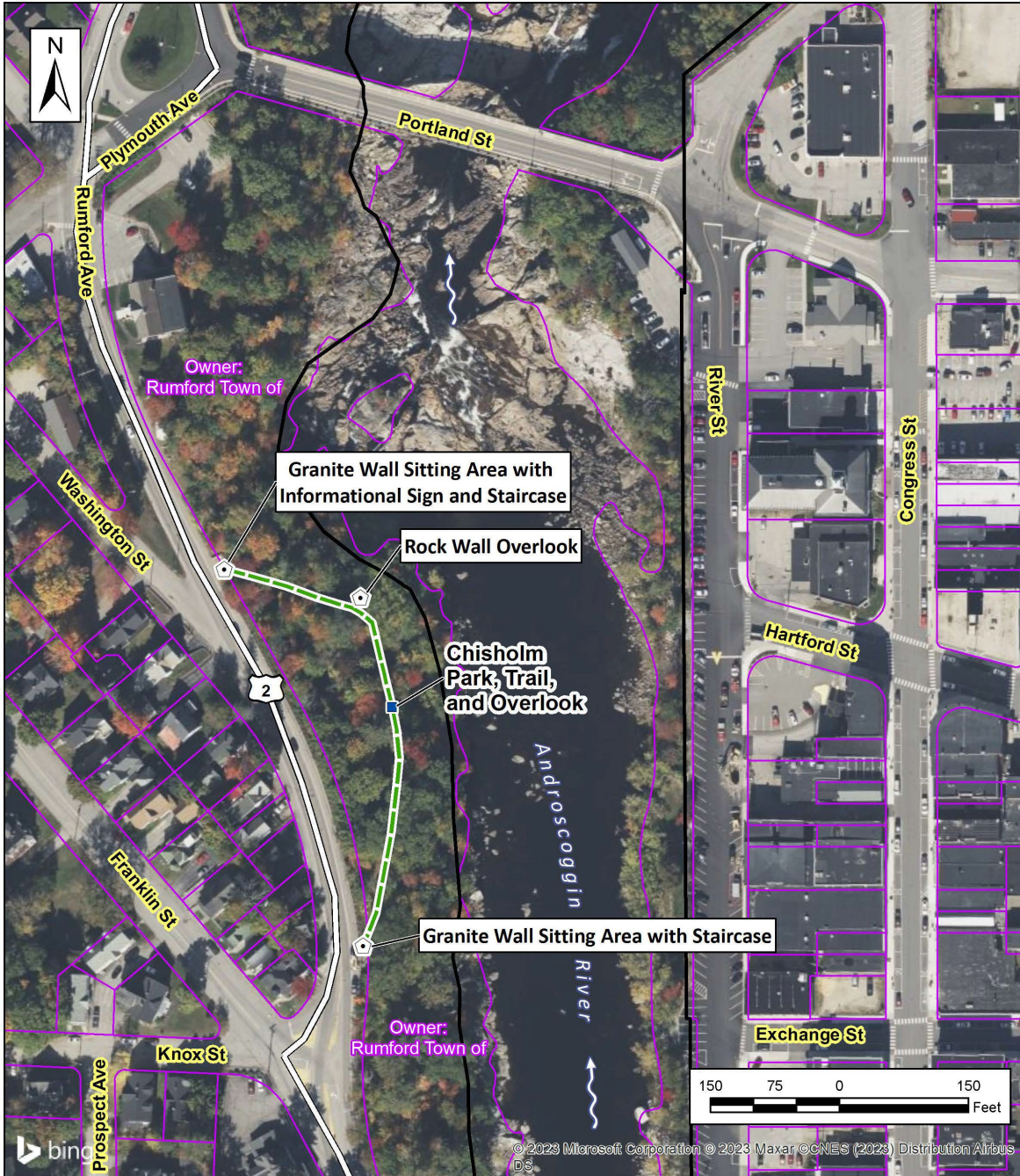
MDACF Boat Launch in Mexico

Map Information was compiled from the best available free sources. No warranty is made for its accuracy and completeness.

Prepared by: HDR Engineering, Inc. | June 2023

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**FIGURE 3
CHISHOLM PARK, TRAIL, AND OVERLOOK**



Legend	
	Amenity
	Non-RFH
	Trail
	Existing Project Boundary
	Parcel Boundary
	U.S. Route

**Rumford Falls Project
FERC No. 2333**

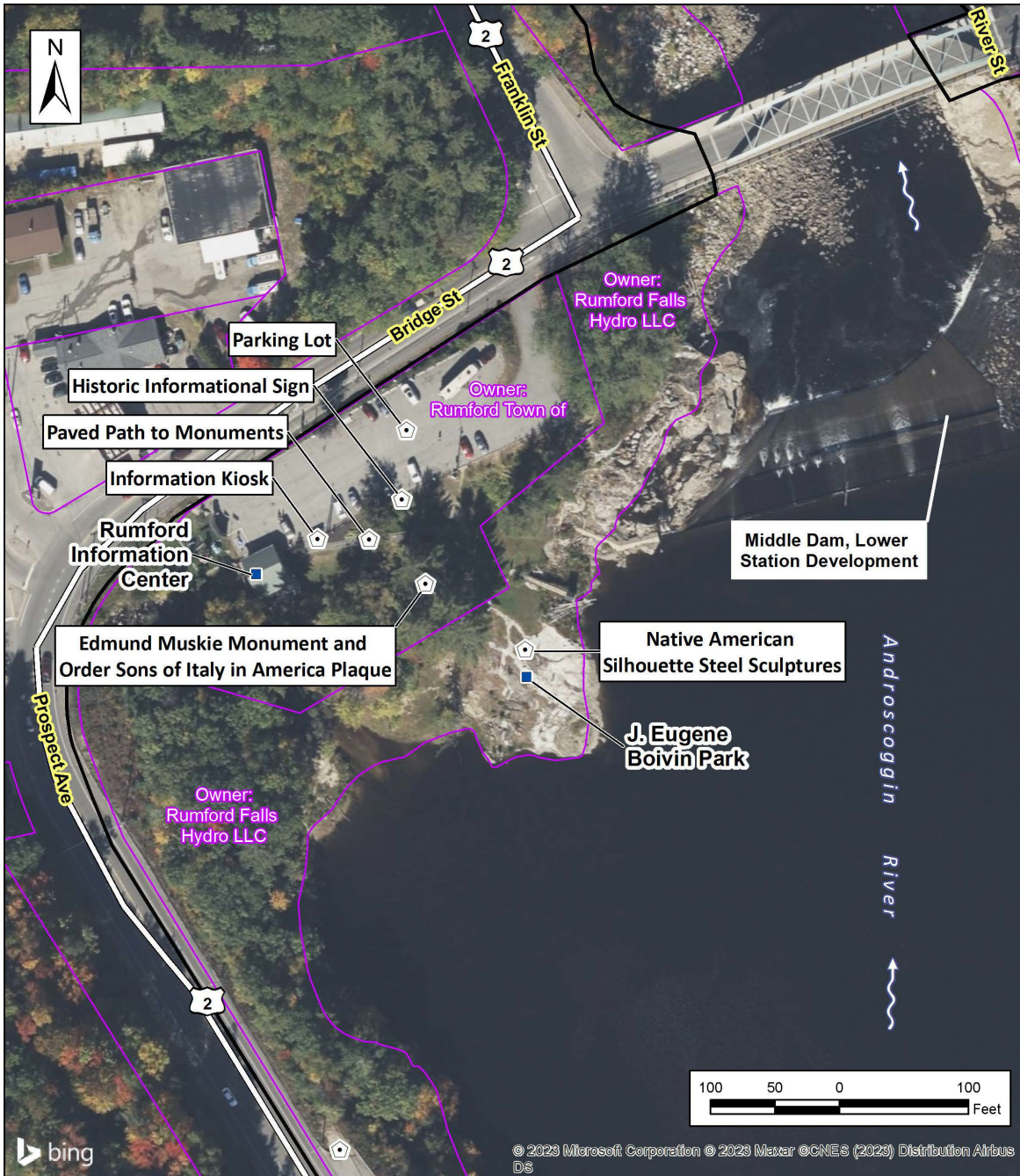
Chisholm Park, Trail, and Overlook

Map Information was compiled from the best available free sources.
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**FIGURE 4
J. EUGENE BOIVIN PARK**



Legend

-  Amenity
-  Non-RFH
-  Existing Project Boundary
-  Parcel Boundary
-  U.S. Route

**Rumford Falls Project
FERC No. 2333**

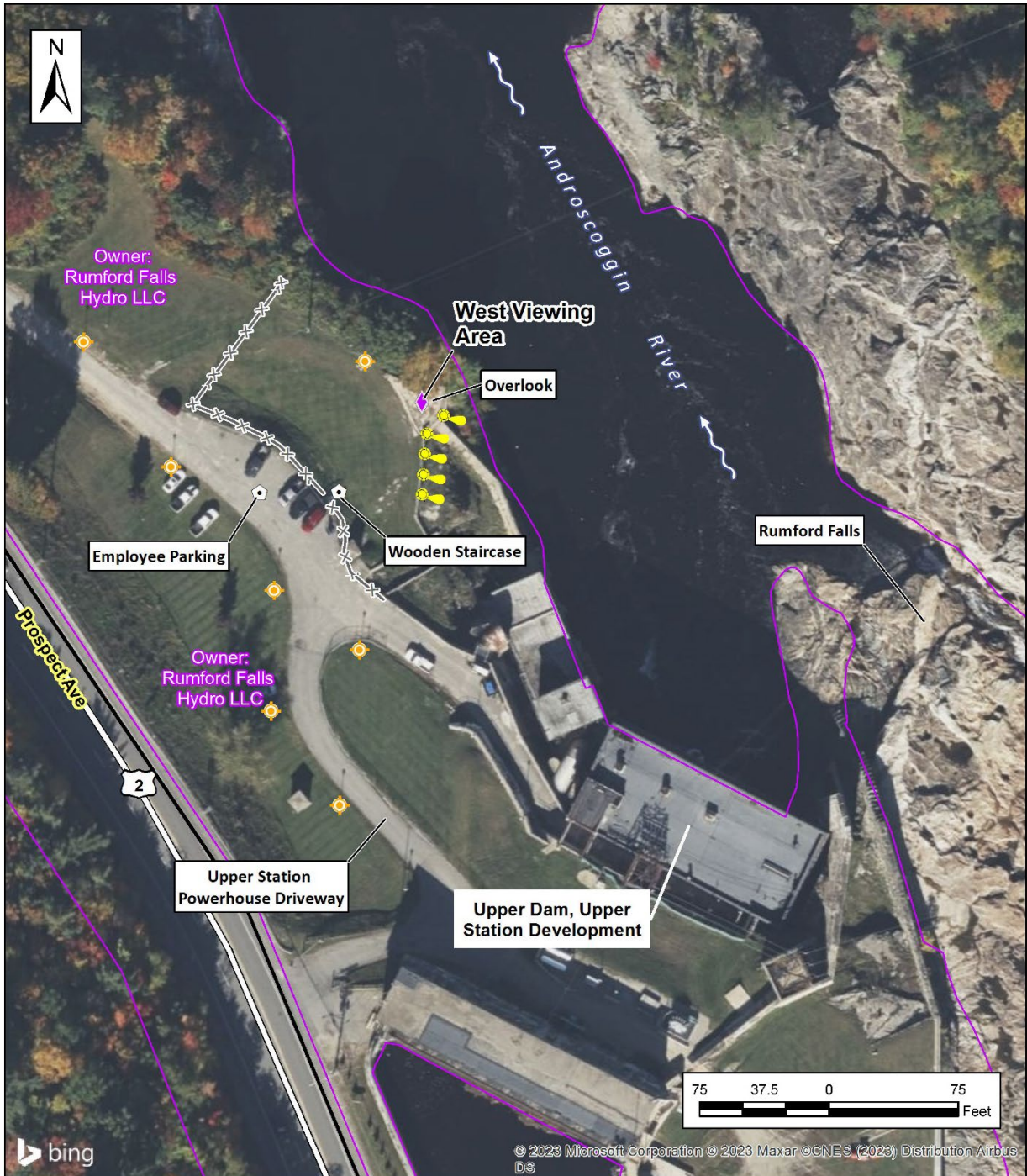
J. Eugene Boivin Park

Map Information was compiled from the best available free sources.
No warranty is made for its accuracy and completeness.

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Document Path: N:\GIS2\Projects\BPNY110175585_RF_Rumford_Falls_Releasings\Map_Docs\Final\map_8_5X11P_20230607_J_Eugene_Boivin_Park.mxd

**FIGURE 5
WEST VIEWING AREA**



Legend	
	Amenity
	Lamp Post
	Spotlight
	RFH-owned
	Existing Chain Link Fence
	Existing Project Boundary
	Parcel Boundary
	U.S. Route

**Rumford Falls Project
FERC No. 2333**

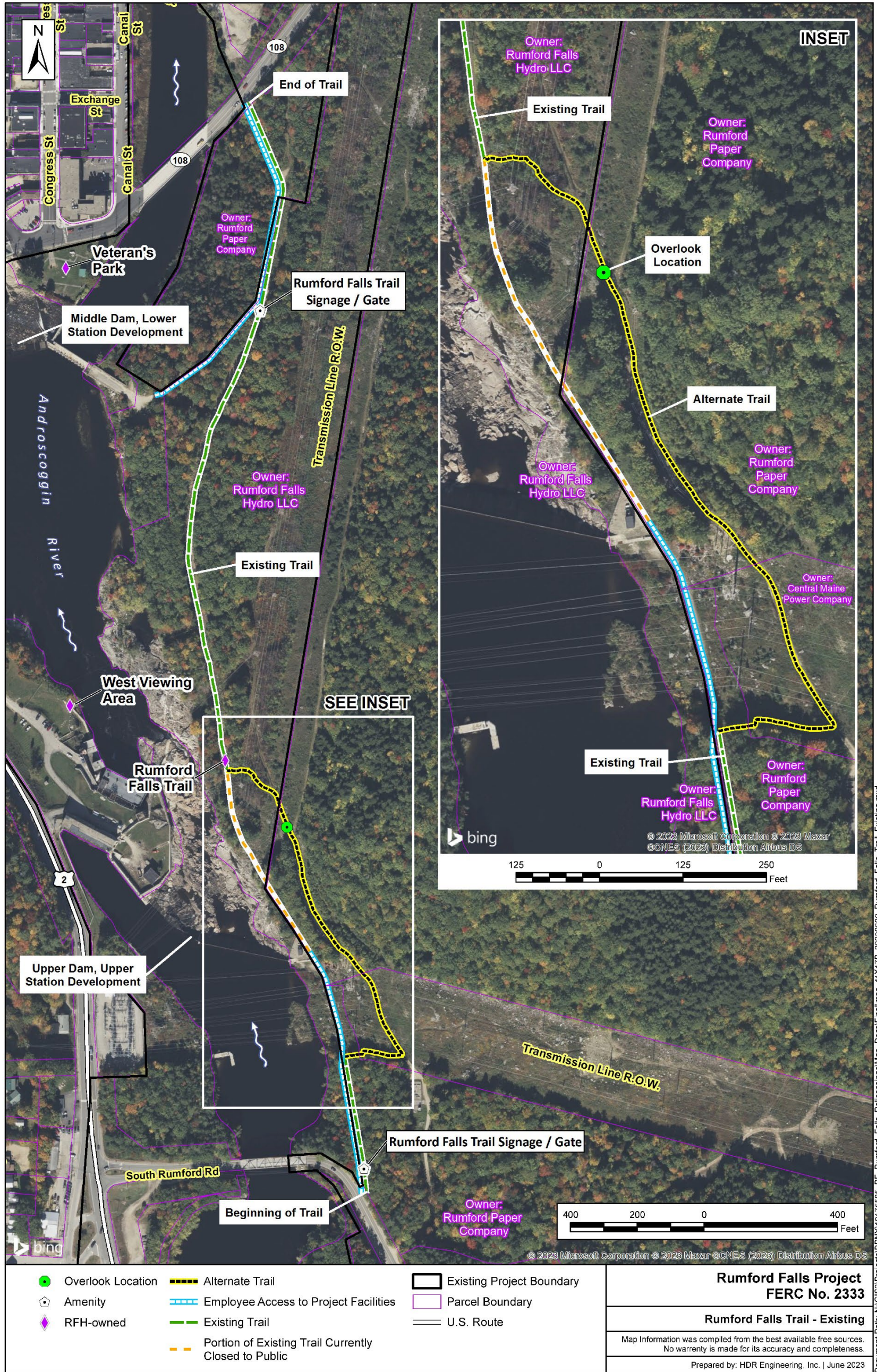
West Viewing Area - Existing

Map Information was compiled from the best available free sources.
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FIGURE 6
RUMFORD FALLS TRAIL



	Overlook Location		Alternate Trail		Existing Project Boundary
	Amenity		Employee Access to Project Facilities		Parcel Boundary
	RFH-owned		Existing Trail		U.S. Route
			Portion of Existing Trail Currently Closed to Public		

Rumford Falls Project
FERC No. 2333

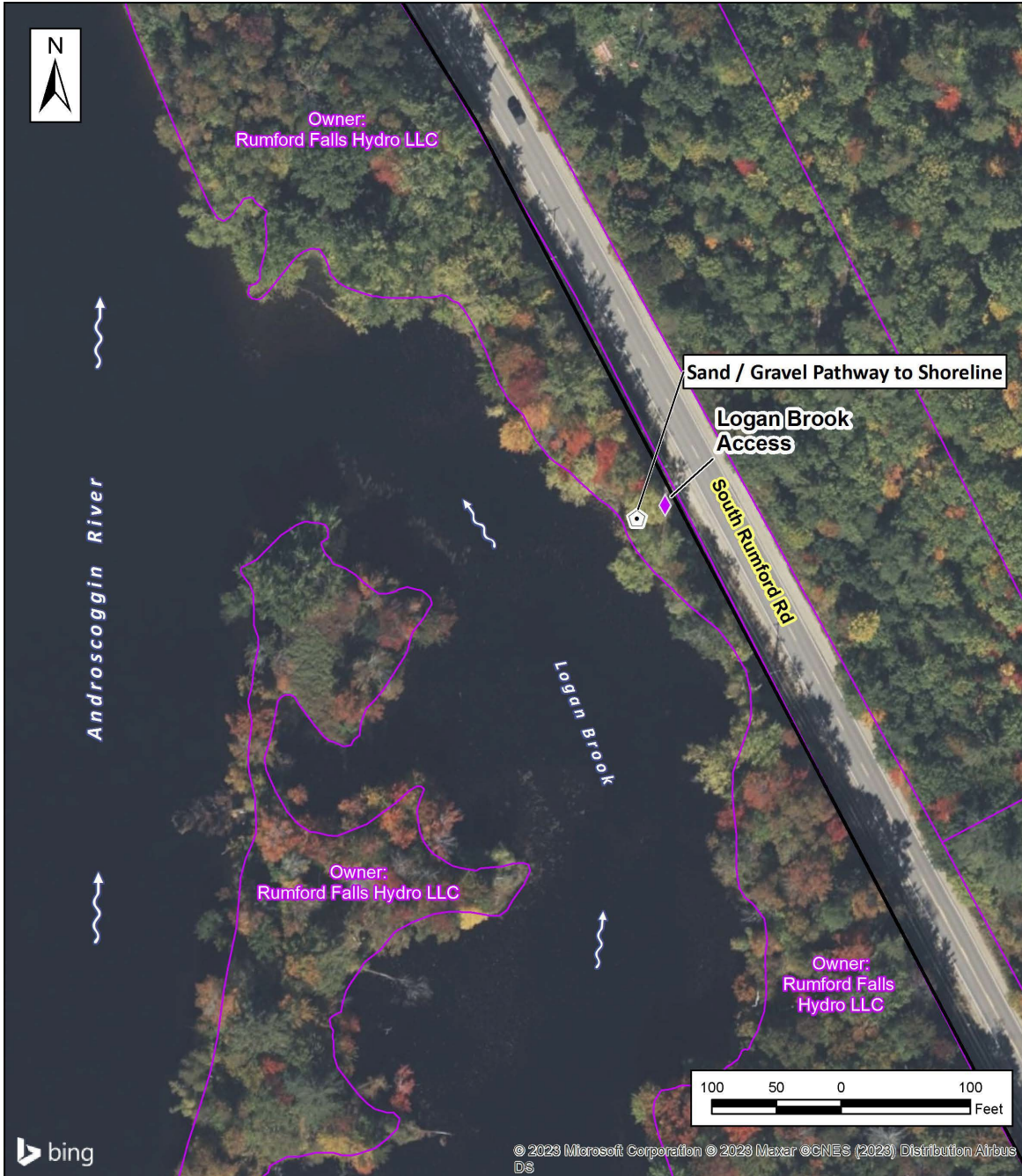
Rumford Falls Trail - Existing

Map Information was compiled from the best available free sources. No warranty is made for its accuracy and completeness.

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**FIGURE 7
LOGAN BROOK ACCESS**

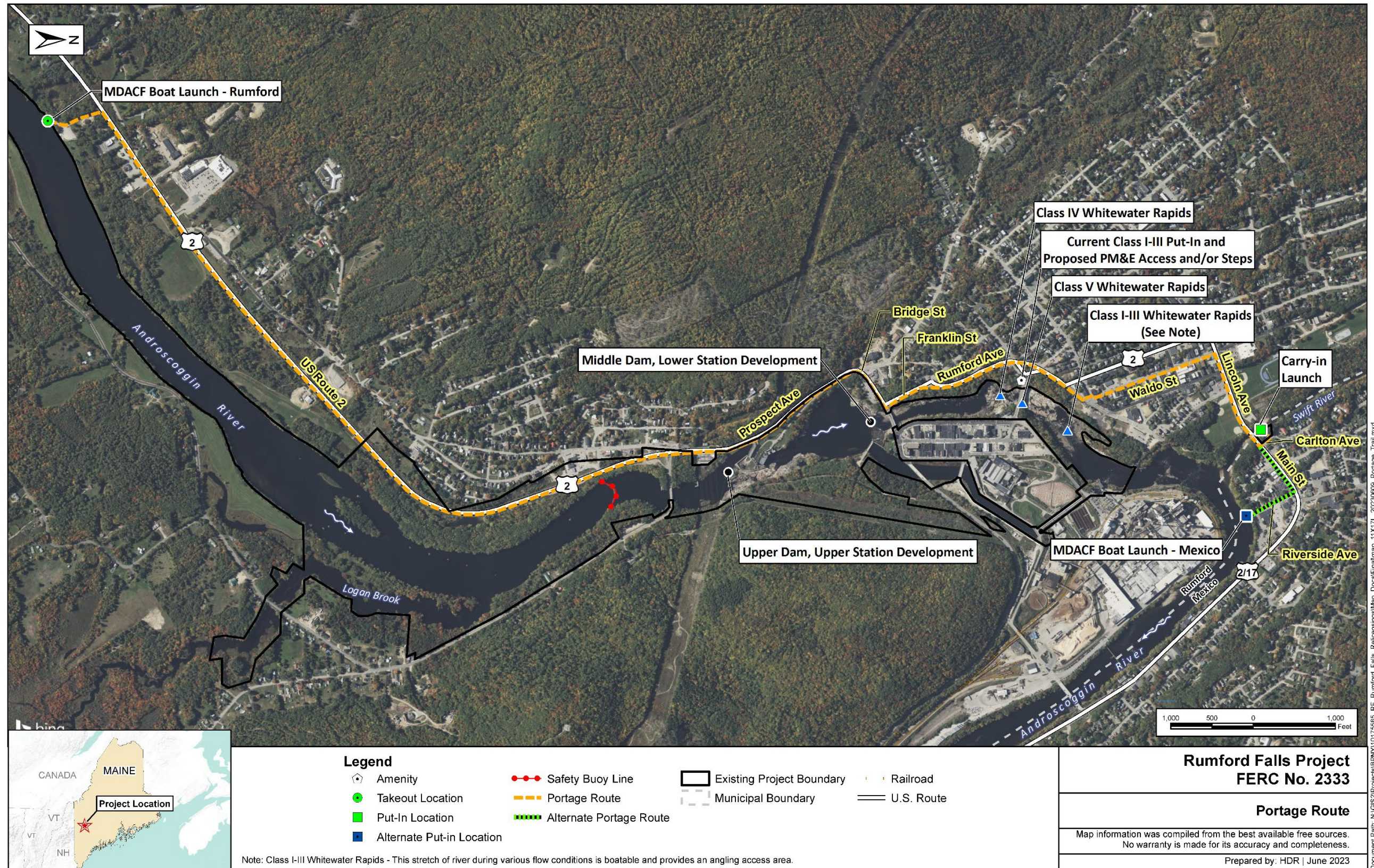


Legend	
	Amenity
	RFH-owned
	Existing Project Boundary
	Parcel Boundary

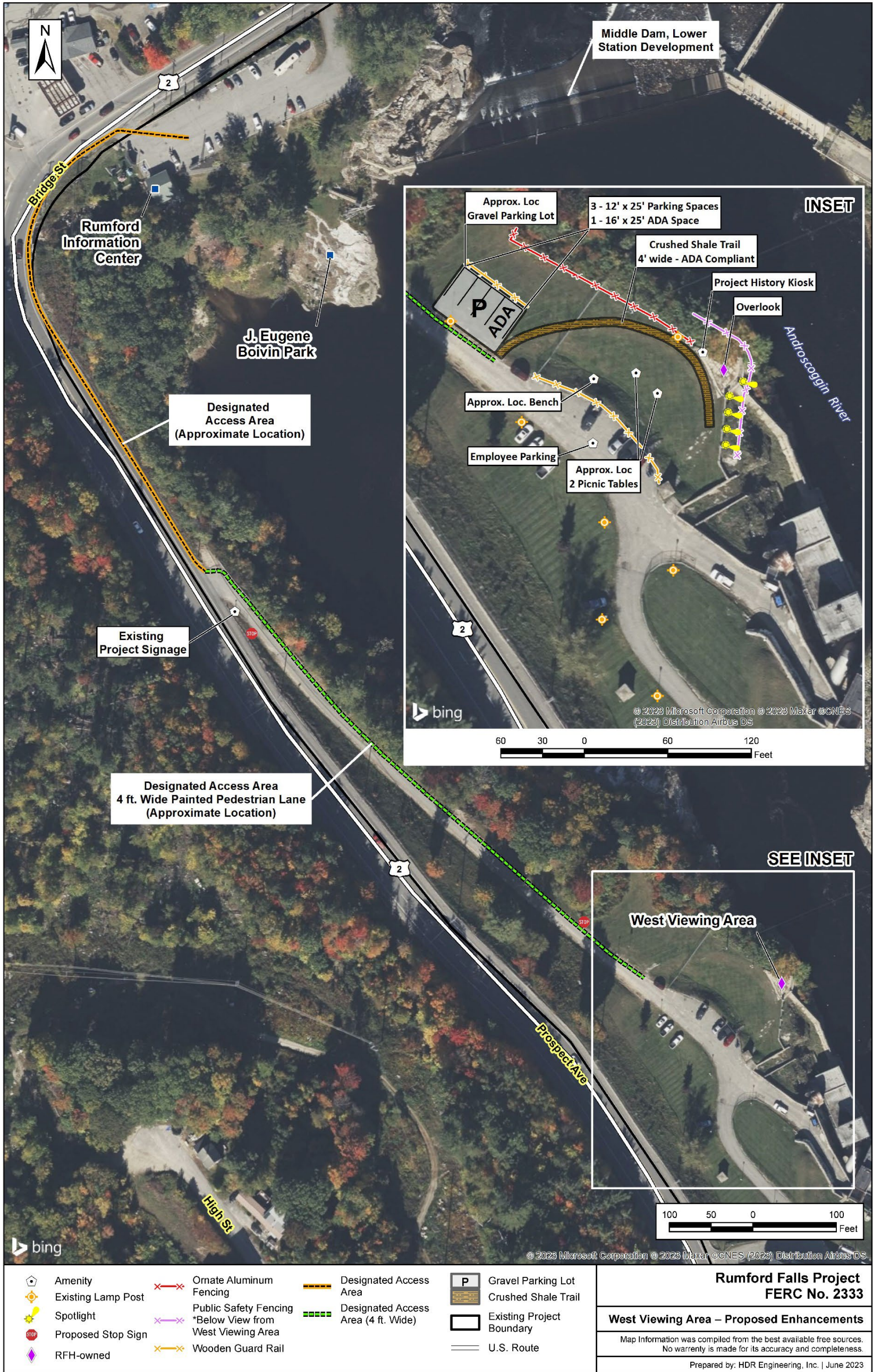
Rumford Falls Project FERC No. 2333
Logan Brook Access
Map Information was compiled from the best available free sources. No warranty is made for its accuracy and completeness.
Prepared by: HDR Engineering, Inc. June 2023

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FIGURE 8
PORTAGE ROUTE



**FIGURE 9
WEST VIEWING AREA – PROPOSED ENHANCEMENTS**



	Amenity		Ornate Aluminum Fencing		Designated Access Area		Gravel Parking Lot
	Existing Lamp Post		Public Safety Fencing *Below View from West Viewing Area		Designated Access Area (4 ft. Wide)		Crushed Shale Trail
	Spotlight		Wooden Guard Rail				Existing Project Boundary
	Proposed Stop Sign						U.S. Route
	RFH-owned						

**Rumford Falls Project
FERC No. 2333**

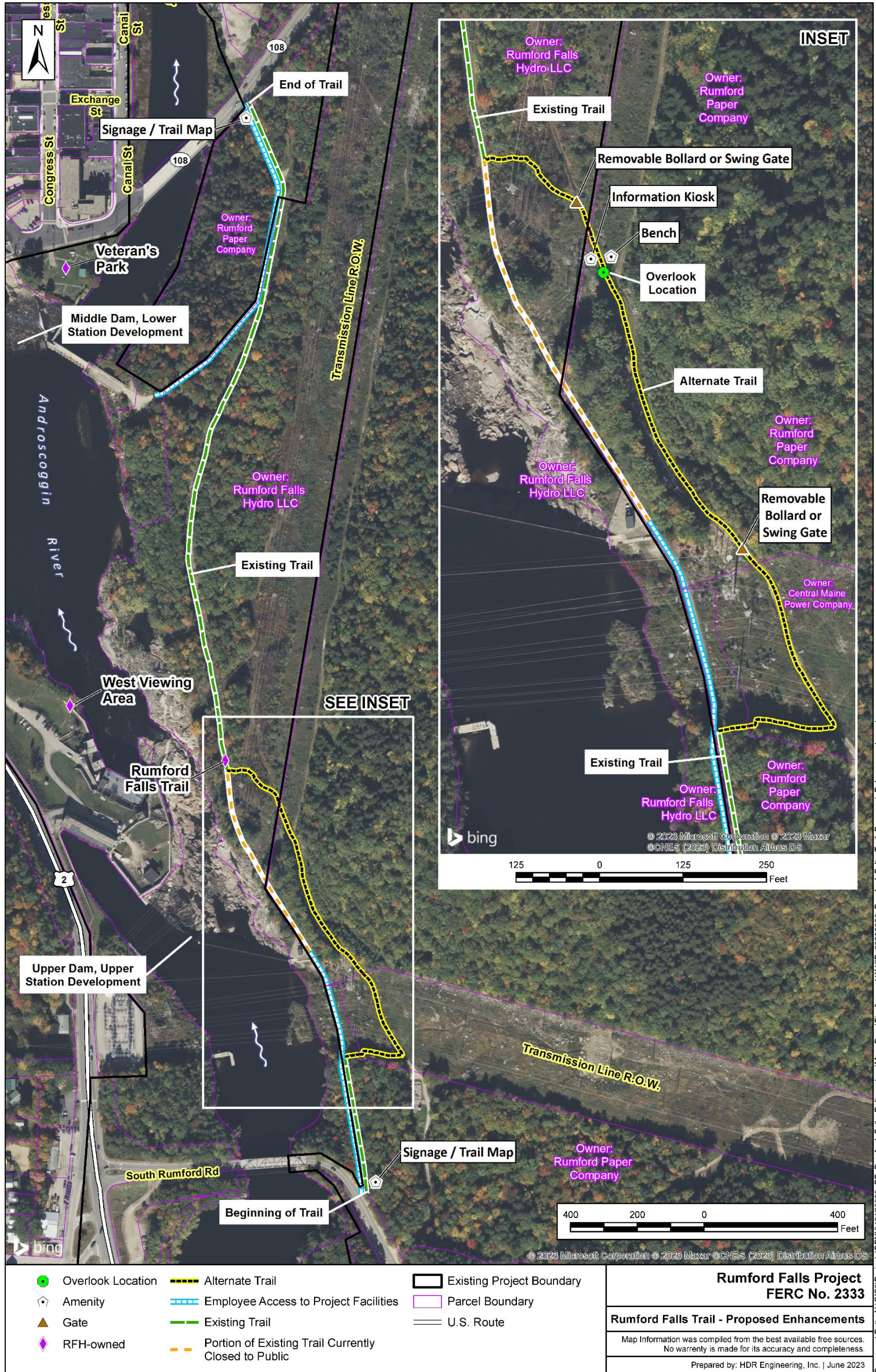
West Viewing Area – Proposed Enhancements

Map Information was compiled from the best available free sources.
No warranty is made for its accuracy and completeness.

Prepared by: HDR Engineering, Inc. | June 2023

Document Path: N:\GIS2\Projects\BPNY110175585_RF_Rumford_Falls_Relicensing\Map_Docs\Finalmap_11X17P_20230609_West_Viewing_Area_Proposed_Enhancements.mxd

**FIGURE 10
RUMFORD FALLS TRAIL – PROPOSED ENHANCEMENTS**



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APPENDIX B
ADDITIONAL RECREATION DATA

Table 1. Total Number of Visitors for each Recreation Site by Month and Day Type (Holiday, Weekday, or Weekend), May 21 to September 13, 2022.

Recreation Site ^a	Month and Day Type																	Totals				
	May			May Total	June		June Total	July			July Total	August		August Total	September			September Total	Holiday Total	Weekday Total	Weekend Total	Grand Total
	Holiday	Weekday	Weekend		Weekday	Weekend		Holiday	Weekday	Weekend		Weekday	Weekend		Holiday	Weekday	Weekend					
ATV Trail	0	--	9	9	1	6	7	4	--	6	10	5	27	32	1	4	14	19	5	10	62	77
Carry-In Boat Launch	15	13	6	34	6	5	11	--	4	6	10	7	6	13	2	6	9	17	17	36	32	85
Chisholm Overlook/Park and Trail	0	2	0	2	0	0	0	0	0	3	3	0	1	1	0	0	1	1	0	2	5	7
Hanover Launch	0	0	8	8	0	1	1	13	0	9	22	3	13	16	0	1	4	5	13	4	35	52
Hastings Launch	0	0	7	7	7	6	13	7	1	8	16	7	4	11	0	1	9	10	7	16	34	57
Info. Center/Boivin Park	24	15	26	65	24	39	63	21	24	7	52	29	12	41	9	12	20	41	54	104	104	262
Logan Brook Access	0	--	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
MDACF Launch Mexico	4	3	4	11	12	16	28	15	1	6	22	1	8	9	--	--	11	11	19	17	45	81
MDACF Launch Rumford	14	3	10	27	6	12	18	3	17	21	41	10	74 ^b	84	12	18	15	45	29	54	132	215
Rumford Falls Trail	4	0	2	6	0	0	0	0	0	6	6	0	7	7	0	0	3	3	4	0	18	22
Veteran's Park	--	4	5	9	6	2	8	0	5	0	5	1	1	2	0	0	0	0	0	16	8	24
Grand Total	61	40	78	179	62	87	149	63	52	72	187	63	153	216	24	42	87	153	148	259	477	884

Notes:

'--' indicates that count was not performed for that site on that particular day type due to the randomization of sites surveyed each survey day/time.

^a Wheeler Island was not observed due to encumbered access as specified in the Revised Study Plan.

^b Androscoggin River Watershed Council (ARWC) Adventure Race was held at the MDACF Boat Launch in Rumford on August 27, 2023, with 73 visitors recorded as attending this event.

Table 2. Recreational activities identified by survey respondents (in-person and online) at recreation sites, May 21 through September 13, 2022.

Activity	Recreation Site											
	ATV Trail	Carry-in Boat Launch	Chisholm Overlook/ Park and Trail	Hanover Boat Launch	Hastings Boat Launch	Logan Brook Access	MDACF Launch Mexico	MDACF Launch Rumford	Rumford Falls Trail	Info Center/ Boivin Park	Veteran's Park	Total
Walking	0	0	5	1	3	0	0	4	13	6	2	34
Relaxing	0	0	2	1	0	0	0	9	2	9	2	25
Picnicking	0	1	0	0	0	1	0	7	1	8	2	20
Hiking	0	0	1	1	5	0	0	0	11	1	0	19
Other specified activities	0	1	2	1	2	0	0	3	3	4	0	16
Kayaking	0	0	1	2	2	1	0	3	2	0	0	11
Dog walking	1	0	1	1	1	0	0	1	1	2	0	8
Boat fishing	0	0	0	3	0	1	0	2	0	0	0	6
Canoeing	0	0	0	1	0	2	0	2	1	0	0	6
Running, jogging and fitness	0	0	1	0	0	0	0	1	3	1	0	6
Wildlife viewing	0	0	0	1	0	1	0	1	2	1	0	6
Bank/wading fishing	0	1	0	1	0	0	1	0	1	1	0	5
Off-highway vehicle (ATV/dirt bike)	1	0	0	0	0	0	0	0	3	0	0	4
Sunbathing	0	0	0	0	0	0	0	1	1	1	1	4
Off-road mountain biking	0	0	0	0	0	0	0	0	3	0	0	3
Road cycling	0	0	0	0	0	0	0	0	2	1	0	3
Stand up paddle boarding	0	0	0	1	0	0	0	0	1	0	0	2
Swimming	0	0	0	0	0	0	0	0	2	0	0	2
Tubing/water skiing	0	0	0	0	0	0	0	0	1	0	0	1
Total	2	3	13	14	13	6	1	34	53	35	7	181

Note:

*Survey participants were able to choose more than one activity

*Activities identified by survey participants for Wheeler Island were not included in this table.

Table 3. Recreational activities observed during spot counts at recreation sites, May 21 through September 13, 2022.

Activity	ATV Trail	Carry-In Boat Launch	Chisholm Overlook/Park and Trail	Hanover Boat Launch	Hastings Boat Launch	Logan Brook Access	MDACF Launch Mexico	MDACF Launch Rumford	Rumford Falls Trail	Info. Center/Boivin Park	Veteran's Park	Total
Hiking/Walking	5	42	5	4	32	0	26	8	15	75	15	227
Remaining in Car	0	3	0	0	4	0	7	72	1	96	0	183
Riding Off Road Vehicle (e.g., ATV, dirt bike)	64	24	0	0	0	0	31	3	3	3	0	128
Sporting (e.g., boxing, boat race ^a)	0	0	0	0	0	0	0	73	0	0	4	77
Boating	0	0	0	31	11	1	0	25	0	0	0	68
Using Information Center/ Restroom	4	0	0	0	4	0	0	3	0	25	0	36
Other ^b	1	12	2	3	2	0	0	2	0	7	5	34
Picnicking	0	0	0	0	0	0	1	11	0	20	0	32
Wildlife/Scenery (e.g. Falls) Viewing	0	0	0	2	1	0	0	8	0	14	0	25
Bicycling	1	5	0	2	1	0	6	1	3	5	0	24
Bank Fishing	0	0	0	6	1	0	7	2	0	4	0	20
Food Truck	0	0	0	0	0	0	0	0	0	12	0	12
Fly/Wade Fishing	0	0	0	2	0	0	3	0	0	1	0	6
Tubing/Water Skiing	0	0	0	0	1	0	0	4	0	0	0	5
Boat Fishing	0	0	0	2	0	0	0	1	0	0	0	3
Swimming	0	0	0	0	0	0	0	2	0	0	0	2
Run/Jog	2	0	0	0	0	0	0	0	0	0	0	2
Total	77	85	7	52	57	1	81	215	22	262	24	884

^a ARWC Adventure Race was held at the MDACF Boat Launch in Rumford on August 27, 2023, with 73 visitors recorded as attending this event.

^b Other includes activities such as transient visit, smoking/standing, playing music, photography, watching a parade (Memorial Day), etc.

APPENDIX C

LICENSE APPLICATION, EXHIBIT D – SECTION 4.6 COST OF PROPOSED ENVIRONMENTAL MEASURES

4.6 Costs of Proposed Environmental Measures

RFH proposes the following PM&E measures over the term of the Project's new license:

- Continue to operate the Project in a run-of-river mode where RFH:
 - Maintains the Upper Dam and Middle Dam impoundments within 1 foot of full pond elevation (elevation 601.24 feet USGS at the Upper Dam impoundment and elevation 502.74 feet USGS at the Middle Dam impoundment).
 - Acts to minimize the fluctuations of the reservoir surface elevation (i.e., maintain a discharge from the Project so that, at any point in time, flows immediately downstream from the Project tailraces approximate the sum of the inflows to the Project reservoirs).
 - Maintains the existing FERC-approved recreation facility at the Project (i.e., carry-in canoe facility at the Carlton Bridge).
 - Provides for public uses and access to Project lands and waters.
- Minimum flows:
 - Continue to release a minimum flow of 1 cfs into the Upper Dam bypass reach.
 - Provide a minimum flow, primarily via notched flashboards, into the Middle Dam bypass reach of 95 cfs from May 1st to October 31st and 54 cfs from November 1st to April 30th.
 - If flashboard maintenance or other work that requires the Middle Dam impoundment to be drawn down temporarily for short periods below dam crest, the minimum flow will be maintained during this period no lower than the existing minimum flow of 21 cfs.
- Whitewater boating enhancements – Middle Dam bypass reach:
 - In addition to exceedance events and planned and unplanned station outages, provide scheduled Project flow releases in the Middle Dam bypass reach, for whitewater boating within the lower portion of the bypass reach if sufficient inflow is available. RFH would provide these releases to obtain flows within the targeted range of:

- 1,200 cfs to 1,500 cfs in the Middle Dam bypass reach during three days (total) June through August, to be determined based on consultation with the Town of Rumford and American Whitewater, from 10 am – 3 pm.
- In consultation with the Town of Rumford, build and maintain access and/or steps from behind the Rumford Public Library for river access.
- Provide public information regarding flow releases in the Middle Dam bypass reach via SafeWaters (or a comparable system), a publicly accessible website and tollfree phone line operated by Brookfield. This will include additional posting notification of the scheduled whitewater boating flow releases, including any cancellations, in the event sufficient flow or circumstances arise in which these flow releases cannot be provided.
- Aesthetic flows – Upper Dam bypass reach:
 - In addition to exceedance events and planned and unplanned station outages, if sufficient inflow is available, provide aesthetic flow releases in the Upper Dam bypass reach with a target flow ranging from 1,200 – 1,500 cfs for three days (total), June through August, to be determined based on consultation with the Town of Rumford, from 10 am – 4 pm.
 - Provide flood lighting of the falls at the upper station at river flows greater than 6,000 cfs between 8 pm – 12 am year round.
 - Post via SafeWaters (or a comparable system) proposed scheduled aesthetic flow events and will include any cancellations, in the event sufficient flow or circumstances arise in which these flow releases cannot be provided.
- Recreation Enhancements
 - West Viewing Area
 - Enhance and maintain West Viewing Area
 - Patch and repair minor concrete surfaces on the West Viewing Area concrete deck and railing where appropriate.
 - Relocate lights, which currently illuminate falls, and mount to inside of existing concrete railing for public safety and aesthetic purposes.

- Remove existing chain link fencing and gates around the perimeter of the West Viewing Area, leaving area open to the public.
 - Maintain existing wooden staircase with railing located at the employee parking area, which leads to the viewing deck area.
 - Develop a dedicated public gravel parking area for four vehicles and access from the parking area to viewing area; the fourth parking space, closest to the viewing area, will be a dedicated American Disabilities Act (ADA) parking space.
 - Install wood parking guard rail across the four proposed public parking spaces between the proposed parking spaces and the existing grass area. After the removal of the chain link fence noted above, install a wood parking guardrail for the current employee and contractor parking areas. Include a pedestrian access break in the guard rail to allow access to the existing wooden staircase leading to the viewing deck.
 - Install ornate 8-foot-high black aluminum fencing similar to the fence at the Town of Rumford's J. Eugene Boivin Park, from an area just adjacent to the West Viewing Area along the top of the steep river embankment for public safety, leaving the grass viewing area open to the public.
 - Install a short segment of chain link security fencing below the West Viewing Area deck for public safety purposes and below the line of site from the viewing area to the falls and Middle Dam impoundment.
 - Install Project/history kiosk, two picnic tables, and one bench.
 - Provide dedicated walking access along the existing Upper Station powerhouse driveway, which can be accessed from J. Eugene Boivin Park via the public sidewalk on Route 2.
 - Provide public access from April 15th to October 31st, dawn to dusk, consistent with hours of operation at the Town of Rumford's J. Eugene Boivin Park.
- Rumford Falls Trail
 - Enhance and maintain alternate trail segment, constructed by RFH in 2021.

- Improve trail bed material to make firmer and where appropriate add wood crib steps to the steep portions of the alternate trail.
- Install a removable bollard or swing gate to prohibit unauthorized vehicles from driving on to the elevated segment of the alternate trail and to allow pedestrian access.
- Install a bench and kiosk with information about the history of the Project at the falls overlook.
- Add signage at both entrances with a trail map.
- Obtain an easement for the license term for the relatively short segment of land along the middle segment of the alternate trail, which is owned by ND Paper, prior to the expiration of the current access agreement (the current agreement may be extended by mutual agreement and expires in November of 2026).
- Provide access year-round, dawn to dusk, with snow removal or snow management limited to the service road from Route 108 and South Rumford Road needed for RFH employee access and Project operations.
 - Maintain Rumford Falls trail segments which lead to the alternate trail from Route 108 and to the alternate trail from South Rumford Road.
- Angling access enhancements Middle Dam bypass reach
 - As proposed for whitewater boating and further detailed in RFHs AIR response dated March 6, 2023, in consultation with the Town of Rumford, build and maintain access and/or steps from behind the Rumford Public Library for river access.
- Develop a Recreation Management Plan
 - The details of future recreation and recreation management will be summarized in a Recreation Management Plan developed within 6 months of license issuance. The Recreation Management Plan will include proposed recreation site enhancements and maintenance activities.
- Develop and implement a Historic Properties Management Plan (HPMP) to provide for the management of historic properties throughout the term of the license.
- Develop an Operations Compliance Management Plan to confirm the Project is operated in compliance with the new FERC license.

A cost estimate associated with implementation of these measures is provided in Table 4.6-1.

**TABLE 4.6-1
COST ESTIMATES OF PROPOSED ENVIRONMENTAL MEASURES**

Item	Capital Cost (2022 dollars)	Incremental O&M or Annual Cost (2022 dollars) ¹
Continue to operate the Project in a run-of-river mode.	\$0	\$0
<u>Maintains the existing FERC-approved recreation facility at the Project (i.e., carry-in canoe facility at the Carlton Bridge).</u>	<u>\$0</u>	<u>\$2,000</u>
Continue to release a minimum flow of 1 cfs into the Upper Dam bypass reach.	\$0	\$0
Provide a minimum flow into the Middle Dam bypass reach of 95 cfs from May 1 st to October 31 st and 54 cfs from November 1 st to April 30 th .	\$1,000	\$250
Whitewater boating – Provide target flows of 1,200–1,500 cfs to the Middle Dam bypass reach for whitewater boating during three days, June through August, from 10 am – 3 pm.	\$0	\$3,000
Whitewater boating and angling access – Build and maintain access and/or steps from behind the Rumford Public Library for river access.	\$75,000	\$2,500
Aesthetic flows – Provide target flows of 1,200–1,500 cfs to the Upper Dam bypass reach during three days, June through August, from 10 am – 4 pm.	\$0	\$3,000
Aesthetic flows lighting – Provide lighting of the falls at the upper station at river flows greater than 6,000 cfs between 8 pm – 12 am year round.	\$250	\$250
Provide public information regarding flow releases in the Middle Dam bypass and the Upper Dam bypass reaches via SafeWaters (or a comparable system), posting notification of the scheduled whitewater boating flow and aesthetic flow releases.	\$6,000	\$1,500
Enhance and maintain West Viewing Area and provide public access from April 15 th to October 31 st , dawn to dusk.	\$175,000	\$2,000
Maintain Rumford Falls trail segments which lead to the alternate trail from Route 108 and to the alternate trail from South Rumford Road and enhance and maintain the alternate trail segment.	\$65,000	\$4,000
Develop a Recreation Management Plan.	\$15,000	\$2,000
Develop and implement a Historic Properties Management Plan.	\$15,000	\$2,000
Develop an Operations Compliance Management Plan.	\$15,000	\$5,000

¹ Incremental operations and maintenance (O&M) cost is limited to additional expenditures. Generation loss due to implementation of these measures is presented in Table 7.0-1

APPENDIX D

LICENSE APPLICATION, EXHIBIT E – SECTION 4.2.4

PROPOSED ENVIRONMENTAL MEASURES

4.2.4 Proposed Environmental Measures

RFH proposes the following PM&E measures over the term of the Project’s new license:

- Continue to operate the Project in a run-of-river mode where RFH:
 - Maintains the Upper Dam and Middle Dam impoundments within 1 foot of full pond elevation (elevation 601.24 feet USGS at the Upper Dam impoundment and elevation 502.74 feet USGS at the Middle Dam impoundment).
 - Acts to minimize the fluctuations of the reservoir surface elevation (i.e., maintain a discharge from the Project so that, at any point in time, flows immediately downstream from the Project tailraces approximate the sum of the inflows to the Project reservoirs).
 - Maintains the existing FERC-approved recreation facility at the Project (i.e., carry-in canoe facility at the Carlton Bridge).
 - Provides for public uses and access to Project lands and waters.
- Minimum flows:
 - Continue to release a minimum flow of 1 cfs into the Upper Dam bypass reach.
 - Provide a minimum flow, primarily via notched flashboards, into the Middle Dam bypass reach of 95 cfs from May 1st to October 31st and 54 cfs from November 1st to April 30th.
 - If flashboard maintenance or other work that requires the Middle Dam impoundment to be drawn down temporarily for short periods below dam crest, the minimum flow will be maintained during this period no lower than the existing minimum flow of 21 cfs.
- Whitewater boating enhancements – Middle Dam bypass reach:
 - In addition to exceedance events and planned and unplanned station outages, provide scheduled Project flow releases in the Middle Dam bypass reach, for whitewater boating within the lower portion of the bypass reach if sufficient inflow is available. RFH would provide these releases to obtain flows within the targeted range of:

- 1,200 cfs to 1,500 cfs in the Middle Dam bypass reach during three days (total) June through August, to be determined based on consultation with the Town of Rumford and American Whitewater, from 10 am – 3 pm.
- In consultation with the Town of Rumford, build and maintain access and/or steps from behind the Rumford Public Library for river access.
- Provide public information regarding flow releases in the Middle Dam bypass reach via SafeWaters (or a comparable system), a publicly accessible website and tollfree phone line operated by Brookfield. This will include additional posting notification of the scheduled whitewater boating flow releases, including any cancellations, in the event sufficient flow or circumstances arise in which these flow releases cannot be provided.
- Aesthetic flows – Upper Dam bypass reach:
 - In addition to exceedance events and planned and unplanned station outages, if sufficient inflow is available, provide aesthetic flow releases in the Upper Dam bypass reach with a target flow ranging from 1,200 – 1,500 cfs for three days (total), June through August, to be determined based on consultation with the Town of Rumford, from 10 am – 4 pm.
 - Provide flood lighting of the falls at the upper station at river flows greater than 6,000 cfs between 8 pm – 12 am year round.
 - Post via SafeWaters (or a comparable system) proposed scheduled aesthetic flow events and will include any cancellations, in the event sufficient flow or circumstances arise in which these flow releases cannot be provided.
- Recreation Enhancements
 - West Viewing Area
 - Enhance and maintain West Viewing Area
 - Patch and repair minor concrete surfaces on the West Viewing Area concrete deck and railing where appropriate.

- Relocate lights, which currently illuminate falls, and mount to inside of existing concrete railing for public safety and aesthetic purposes.
- Remove existing chain link fencing and gates around the perimeter of the West Viewing Area, leaving area open to the public.
- Maintain existing wooden staircase with railing located at the employee parking area, which leads to the viewing deck area.
- Develop a dedicated public gravel parking area for four vehicles and access from the parking area to viewing area; the fourth parking space, closest to the viewing area, will be a dedicated American Disabilities Act (ADA) parking space.
- Install wood parking guard rail across the four proposed public parking spaces between the proposed parking spaces and the existing grass area. After the removal of the chain link fence noted above, install a wood parking guardrail for the current employee and contractor parking areas. Include a pedestrian access break in the guard rail to allow access to the existing wooden staircase leading to the viewing deck.
- Install ornate 8-foot-high black aluminum fencing similar to the fence at the Town of Rumford's J. Eugene Boivin Park, from an area just adjacent to the West Viewing Area along the top of the steep river embankment for public safety, leaving the grass viewing area open to the public.
- Install a short segment of chain link security fencing below the West Viewing Area deck for public safety purposes and below the line of site from the viewing area to the falls and Middle Dam impoundment.
- Install Project/history kiosk, two picnic tables, and one bench.
- Provide dedicated walking access along the existing Upper Station powerhouse driveway, which can be accessed from J. Eugene Boivin Park via the public sidewalk on Route 2.
- Provide public access from April 15th to October 31st, dawn to dusk, consistent with hours of operation at the Town of Rumford's J. Eugene Boivin Park.
- Rumford Falls Trail
 - Enhance and maintain alternate trail segment, constructed by RFH in 2021.

- Improve trail bed material to make firmer and where appropriate add wood crib steps to the steep portions of the alternate trail.
- Install a removable bollard or swing gate to prohibit unauthorized vehicles from driving on to the elevated segment of the alternate trail and to allow pedestrian access.
- Install a bench and kiosk with information about the history of the Project at the falls overlook.
- Add signage at both entrances with a trail map.
- Obtain an easement for the license term for the relatively short segment of land along the middle segment of the alternate trail, which is owned by ND Paper, prior to the expiration of the current access agreement (the current agreement may be extended by mutual agreement and expires in November of 2026).
- Provide access year-round, dawn to dusk, with snow removal or snow management limited to the service road from Route 108 and South Rumford Road needed for RFH employee access and Project operations.
 - Maintain Rumford Falls trail segments which lead to the alternate trail from Route 108 and to the alternate trail and from South Rumford Road.
- Angling access enhancements Middle Dam bypass reach
 - As proposed for whitewater boating and further detailed in RFHs AIR response dated March 6, 2023, in consultation with the Town of Rumford, build and maintain access and/or steps from behind the Rumford Public Library for river access.
- Develop a Recreation Management Plan
 - The details of future recreation and recreation management will be summarized in a Recreation Management Plan developed within 6 months of license issuance. The Recreation Management Plan will include proposed recreation site enhancements and maintenance activities.
- Develop and implement a Historic Properties Management Plan (HPMP) to provide for the management of historic properties throughout the term of the license.
- Develop an Operations Compliance Management Plan to confirm the Project is operated in compliance with the new FERC license.

APPENDIX E

PHOTOS

Photo 1

Trailer-size parking spaces for vehicles with boat trailers at the Maine Department of Agriculture, Conservation, and Forestry (MDACF) Boat Launch in Mexico (taken from entrance of MDACF boat launch facing east)



Photo 2

Standard-size parking spaces for vehicles at the MDACF Boat Launch in Mexico (taken just east of parking spaces for vehicles with boat trailers facing east)



Photo 3

Portion of sidewalk along Route 2 from J. Eugene Boivin Park to Upper Station powerhouse driveway (taken from parking lot at Rumford Information Center/J. Eugene Boivin Park facing east)



Photo 4

Portion of sidewalk along Route 2 from J. Eugene Boivin Park to Upper Station powerhouse driveway (taken from entrance of Upper Station powerhouse driveway facing north)



Photo 5
Upper Station powerhouse driveway entrance off Route 2 (facing north)



Photo 6
Upper Station powerhouse driveway (taken from north end of driveway facing south)



Photo 7
Exposed embankment to the north of the West Viewing Area and proposed location of ornate fencing



Photo 8
Spotlights and Ornate Fencing at West Viewing Area



Photo 9

Steep embankment above and along the stakeholder-recommended location of trail from J. Eugene Boivin Park to the West Viewing Area



Photo 10
Steep embankment and rocks along the stakeholder-recommended location of trail from J. Eugene Boivin Park to the West Viewing Area



Photo 11

Boulder retaining wall along embankment below the Upper Station powerhouse driveway and along the stakeholder-recommended location of trail from J. Eugene Boivin Park to the West Viewing Area



Photo 12

Drainage area along the stakeholder-recommended location of trail from J. Eugene Boivin Park to the West Viewing Area



Photo 13

Embankment adjacent to Prospect Avenue/Route 2 along Upper Station powerhouse driveway and proposed pedestrian access to West Viewing area from J. Eugene Boivin Park



Photo 14
Proposed location of gravel parking area at the West Viewing Area (facing north)

