

City of Auburn, Maine

Office of the City Manager



June 24, 2014

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

RE: Study Request, Lower Barker Hydroelectric (FERC No. 2808), KEI (Maine) Power Management (III)

Dear Secretary Bose:

On January 31, 2014, KEI (Maine) Power Management (III) LLC [KEI (Maine)] filed the Pre-Application Document (PAD) for the Lower Barker Hydroelectric Project (FERC No. 2808) with the Commission. On March 19, 2014 the Commission granted the use of the Traditional Licensing Process (TLP) for the Lower Barker Project. The City of Auburn, Maine is also filing separate comments on the PAD.

This filing contains The City of Auburn's formal study request based on the PAD and 5/19/14 consultation meeting.

The City requests that the applicant complete a recreational study including the development of additional recreational access, identification of niche recreational opportunities that could support growing economic opportunity for the neighborhood and white water potential consistent with the American Whitewater request for this study. The Form -80 recreational survey that is in progress is inadequate to consider the needs of the community and demand for additional facilities. As noted in the comments also submitted by the City of Auburn recreational access to the Little Androscoggin River is a high community priority.

The PAD identifies a year-round minimum flow of 20 cfs as an existing license requirement within the lengthy bypass channel which extends approximately ½ mile to the confluence with the tailrace. The river extends an additional ¼ mile beyond the tailrace to the confluence with the Androscoggin River. During the 5/19/14 consultation meeting a KEI representative indicated that the actual total year round minimum flow maintained in the bypass is approximately 30 CFS. A site walk by City staff on June 10, 2014 revealed that the flows in the bypass reach were not adequate to support migratory Aelwives and fish were becoming stranded on the rocks in the bypass reach. Photos and video are available if requested. It is unclear if minimum flows were followed on that day or if the

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minimum flows are inadequate to support fish passage but the City of Auburn supports the Maine IF&W request for a flow study and for improved fish passage at the facility. It should also be noted that fish passage facilities are being improved between this facility and the Atlantic Ocean and similar improvements should be studied at this facility.

In addition the City requests a study of public and private benefits associated with the dam and the facility's limited generating capacity. The Dam splits a roughly 6800' section of the Little Androscoggin River between the Upper Barker Mill Dam and the confluence with the Androscoggin River into two segments. If fish passage, recreational facilities and additional minimum flows are required to mitigate the negative impacts of the facility, then we currently lack the information to consider if decommissioning of the Lower Barker Mill Dam would be in the best interest of all parties involved.

The City further requests that the project area include all lands below the FEMA mapped 1% flood hazard area as adopted on July 8, 2013.

Thank you in advance for your consideration of our requests. Recreational opportunities in our community are a top priority as indicated in our PAD comments document.

Sincerely,



Clinton Deschene
City Manager