



City of Auburn, Maine

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Ms. Kimberly Bose, Secretary
FERC
888 First Street N.W.
Washington, DC 20426

Project 2302
Lewiston Falls Project
Reject application for Non-Capacity Amendment of License

Dear Secretary Bose,

Please reject Brookfield's project 2302 request for license amendment before relicensing begins or request a modified proposal that does not eliminate important project recreation facilities from the area impacted by the project. In late 2020 or 2021 Brookfield will begin the relicensing process for Project 2302, Lewiston Falls/Monty Hydro, which is set to expire in 2026. Their request for comments to Lewiston, Auburn and all others, comes in the middle of the virus pandemic with 30 days notice for comments and unfortunately was missed by the City of Auburn due to COVID-19 related staff limitations. In preparation for the relicensing process, we believe they may be able to avoid responsibilities to the City of Auburn and its people for aesthetics and recreation as prescribed by FERC in Section 4(e) of the Federal Power Act if the proposed amendment is approved. Whether this is a calculated move to avoid their responsibilities to the public before relicensing or not there are substantial recreational facilities and needs within the area proposed for elimination from the Project Boundary and the reduction should not be allowed as proposed.

Brookfield Whit Pine Hydro, LLC is proposing to amend the project boundary for the Lewiston Falls/Monty Hydro facility by removing approximately 4 miles of river from the project. The current project boundary extends approximately 5 miles (28,000 feet) downstream from the dam near the Auburn town line and the proposal is to reduce that to .28 miles (1,450 feet). The proposal does retain an "island" project boundary that includes the Durham Boat Launch as a recreational site within the project. The justification provided shows that the transfer of the canals to the City of Lewiston reduced the length of their physical plant infrastructure by approximately .6 miles (3,000 feet); a 6/10 of a mile reduction in plant footprint does not warrant a 4+ mile reduction in project area. We have mapped the area of the existing and proposed project boundary at:

<http://auburnme.maps.arcgis.com/home/webmap/viewer.html?webmap=299f5e528bf44fdbe4e77dec881fc18>

Recreation facilities that exist and those that were part of the 1987 Recreation Plan for P-2302 from Central Maine Power (Now Brookfield White Pine Hydro) will be omitted from the Project Boundary if the amendment is allowed as proposed. Attached is a summary page from that plan. Those facilities include:

- Downtown Auburn/Festival Plaza River Access (at one point labeled as a public safety access, now the site of regular public use both casual and paddling events)

- Simard-Payne Railroad Park/Lewiston Bank Fishing/Hand Carry Access (funded through a significant federal grant with plans for future phases of expansion)
- Auburn Riverwalk bike/ped trail facilities, including pedestrian bridge from 1987 P-2302 CMP Rec Plan
- Little Andy Park/New Auburn River Access (at the confluence of the Little Androscoggin and Androscoggin Rivers, this provides the only access to the main river for this neighborhood and gets regular use by local groups and the public)
- Lincoln Street Boat Access/Lewiston (provides access just upstream of Dressers Rips and gets regular use by paddlers and fishing boats)

The City of Auburn's Comprehensive Plan and Strategic Plan places high priority on recreation and river access. The New Auburn Master (that covers part of the area proposed for removal from the Project Boundary) identifies Recreation Goal #1: as recreational river access. The City of Auburn intends to work closely and collaboratively with Brookfield, an important community business partner, during the upcoming relicensing and we believe that critical information on current recreational demand will be made available during that process. In addition to the existing recreation facilities the City is investing in new opportunities and hopes to partner with Brookfield in expanded recreation facilities to serve residents and visitors within the current Project Boundary during the term of the next license. Some Neighborhoods adjacent to the current Project Boundary are among the poorest in Androscoggin County and can benefit substantially from recreational facilities close to home.

Planned public recreation facilities in area proposed for removal from the license include but are not limited to:

- Downstream access below Dressers Rips (for both paddlers using whitewater and for public safety access)
- Expanded hand carry access behind Hampton Inn - Lewiston (this was part of the hotel approval in Lewiston and Lewiston's Riverfront Masterplan)
- Anniversary Park/New Auburn (given the growth in demand for access to the main river from this neighborhood, Auburn has already spent millions of dollars on property acquisition and is under construction on this project)
- Both cities have planned trail extensions and view corridor enhancements along this stretch as well.
- Interconnections between existing recreation facilities adjacent to the Project Boundary, Low/Mod income Census Tracts and recreation facilities recently required by the April 15, 2020 FERC approval of the Lower Barker Mill Dam (P-2808).

Please deny their request for amendment and either delay action until information is made available during the upcoming relicensing process or request an amended proposal that maintains the Project Boundary over a larger portion of the river, at least to the Maine Turnpike Bridge south of the dam. There has been no demonstration of immediate need or benefit to a quick decision made by Brookfield, with the upcoming licensing process beginning in late 2020 or 2021. These comments are provided with the support of the Auburn City Council at their May 4, 2020 City Council meeting.

Sincerely,
Eric J. Cousens

Eric J. Cousens,
Deputy Director of Economic and Community Development

SITE NAME: Lewiston Falls (Hydropower) FERC 2302
LOCATION: Androscoggin River, Auburn/Lewiston
SETTING: Urban, scenic features (rock outcropping, island)
RECREATION USES: Limited
RECREATION FACILITIES:
1. Historic house and site (Knight House)
CURRENT PROBLEMS:
1. Lack of recreation facilities
PROPOSED MANAGEMENT FOCUS:
Urban open space and passive recreation (local use)
PRELIMINARY RECOMMENDATIONS:

- MP*
Lewiston
1/2
1. Site Improvement
 - a. Interpretive sign (Indians and prehistory, hydropower, urban development)
 - b. Interpretive sign pertaining to the canal system and its preservation
 2. Enhancement of Existing Facilities
 - a. Restore park at construction site
 3. Development of New Facilities
 - a. Develop a boat launch downstream (near sewage treatment plant)
 - b. Assist town in extending the existing river walkway and restoring the foot bridge south of Great Falls (dependent upon public support and assistance)
 - c. Develop West Pitch (consider possible safety problems at this area)
 4. Immediate Needs
none

Concept Plan For The Future
Development And Management Of
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Recreational Facilities

Volume 2:
Technical Report



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Volume 2:
Technical Report



Phase One of a
Corporate Recreational
Facility Plan

