



City of Auburn, Maine

Office of the Mayor and City Council

www.auburnmaine.gov | 60 Court Street

Auburn, Maine 04210

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

KEI (Maine) Power Management (III) LLC

Lower Barker Hydroelectric Project
(FERC Project No. 2808)

CITY OF AUBURN, MAINE COMMENTS IN RESPONSE TO THE WHITEWATER FLOW STUDY FOR THE
LOWER BARKER HYDROELECTRIC PROJECT, FERC PROJECT NO. 2808

The City of Auburn submits these comments to FERC in response to the Whitewater Flow Study (June 2017) for the Lower Barker Hydroelectric Project for the relicensing of the Lower Barker Hydroelectric Project (FERC Project No. 2808). The City has previously submitted comments and study requests requesting that the Licensee study the impact of its hydroelectric operations on the recreational opportunities available to non-motorized boaters in the project area.

When the Licensee submitted their Draft License Application (DLA), they proposed no significant changes to current operations save a minor increase in minimum conservation flows in the natural river channel (bypassed reach) and had not yet completed the whitewater flow studies proposed in the approved study plan. To date, the Licensee has shown a lack of recognition that recreational amenities are important within the project area and the City and the Androscoggin Land Trust (ALT) continue to invest public and private funds to provide improved, yet limited access to the River.

We would like to reiterate, as we did in the previous comment periods in greater detail that the City is spending substantial local, State and Federal resources in and adjacent to the project area to improve the quality of life for our residents and create economic opportunity for the predominantly low income neighborhoods. During the current budget process the City Council programmed in excess of \$1,000,000 to match over \$1,500,000 in potential State and Federal funding to revitalize the adjacent New Auburn Village Center. Plans for proposed and active work in the vicinity of the project were previously provided. The City recently extended a sidewalk connection to the Barker Mill trail with local funds and a Recreational Trails Program Grant from the State of Maine. The cooperation of KEI is an essential component of our economic and recreational strategies yet we recognize that it may be to the advantage of KEI to



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minimize notice and public involvement in the licensing process as this may reduce the perceived recreational demand in the project area.

Project Nexus Summary and Necessary Recreation Impact Mitigation

The whitewater flow study minimizes the quality of the whitewater experience at studied flows for expert whitewater boaters but does highlight that studied flows can provide a good experience for novice to intermediate boaters and the experience would likely improve at higher flows. The report estimates that 600cfs to 800cfs flows could provide a higher quality experience for all boaters with required skill levels increasing with flows. Expert boaters also indicated flows exceeding 1000cfs would provide a desirable expert level experience. The City is pleased to learn that common flows can provide a good experience for novice boaters because there are many more novice boaters or potential novice boaters within the local population than there are expert boaters. Recreational activities for average people is part of the City's strategy to improve quality of life and attract new residents. Paddlers had good things to say about the potential for short run, local recreation, fun play waves and optimism for an even better run at slightly higher flows.

The report also indicates that the put-in trail is a potential safety hazard because it is steep and may be slippery during rain or wet weather. The highest potential for desirable flows exist during the wettest parts of the year and the Licensee should be required to improve access to the project area if a license is issued. Access at this point is only necessary because the hydro electric facility severs paddling connectivity on the river.

Currently there is no reliable flow gauge that the general public can access and easily understand current flow levels or trends within the project area. According to the DLA, the nearest USGS gauge for river flow data is USGS Gage No.01057000, Little Androscoggin River near South Paris, Maine, which is approximately 22 miles northwest of the Lower Barker Project. For the purpose of the DLA and presumably the Whitewater Flow Study, the Licensee estimates flows based on a drainage area proration. The proration is assumed as follows: the drainage area at the USGS gauge is 73.5 square miles, and by comparing that to the drainage area at the Lower Barker dam which is 357.4 square miles, the data is pro-rated by a factor of 4.9 ($=357.4/73.5$) to estimate available flows at Lower Barker. This calculation is too



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cumbersome to expect the general public to learn and understand and not knowing flows above and below the facility in the bypassed reach discourages daytrips to recreate in the project area. Table 4-2 and 4-3 on page 4-12 of the previously submitted DLA (<http://www.auburnmaine.gov/pages/government/rivers-hydropower>) confirms that there are many days with adequate flows for safe and quality recreation opportunities in the project area.

The Licensee proposes no change in its mode of operation that would meaningfully improve recreational opportunities that are impacted adversely by project operations today. Under current license conditions, recreational use of the bypassed reach is severely limited by the lack of any formal access points, the lack of real-time flow information, and the lack of predictable and adequate boatable flows. The upper impoundment and lower bypassed reach is severed by the dam for connective paddling within the river. The Licensee has made no attempt to quantify its impact or propose appropriate project mitigation and enhancement measures for recreation so the City of Auburn respectfully requests that they provide the following related to whitewater and river boating:

1. Agree to provide 600-800 CFS flows for a scheduled recreational boating events at least five times per year for up to 5 hours on a weekend day, coordinated with the City of Auburn.
2. Establish a gauge estimating real time river inflows and bypassed reach outflows that takes into account generating activities and publish the real time information to a website site that can be linked or incorporated to the City of Auburn website. The intent of this is to allow paddlers, anglers and residents to access real time flow information that can help make decisions about safe recreation opportunities available on a given day within the project area.
3. Fund the establishment high quality and safe water access above and below the Lower Barker Mill Dam and contribute to the planned water access on the Little Androscoggin downstream of the turbine, with the City of Auburn committing to partner on access to land for its construction, and contribute an annual payment to the City of Auburn or Androscoggin Land Trust by April 1st annually each year to assist in the maintenance of the Barker Mill Trail expenses connecting the two access points and to serve as a portage trail.

Conclusion

The City of Auburn submits these comments as part of the record for the Lower Barker



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Hydroelectric Project relicensing, and requests that the Licensee revise its Draft License Application to include a commitment to mitigate the impacts of hydroelectric operations to local recreation as outlined above. Thank you for considering these comments.

Respectfully submitted this 2nd day of August 2017

A handwritten signature in black ink that reads "Eric Cousens".

Eric J. Cousens

Deputy Director of Economic and Community Development

City of Auburn, ME