



United States Department of the Interior



NATIONAL PARK SERVICE
NORTHEAST REGION
15 State Street
Boston, Massachusetts 02109-3572

November 4, 2024

Non-ER

Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Comments of National Park Service on the Proposed Study Plan for Brunswick Hydro P-2284

Dear Secretary Reese:

The NPS has reviewed the Proposed Study Plan (PSP) for the Brunswick Hydroelectric Project FERC P-2284 located on the Androscoggin River in the towns of Brunswick and Topsham, located in Cumberland and Sagadahoc Counties in the State of Maine. The NPS files these comments pursuant to our authority under Section 10(a) of the Federal Power Act and 18 C.F.R. Section 4.38. The due date was November 2, 2024 which fell on a Saturday, therefore these comments being filed on the effective due date.

In the NPS comments filed June 20, 2024, we noted the need for a thorough evaluation of the existing portage route, access to the river via existing public access points and recreational use and facilities. In their PSP dated August 2, 2024, the applicant has proposed an online survey and a desktop assessment only, but no field work. There is no substitute for conducting visitor use surveys on site.

Task Two of the Recreation and Land Use Study proposes to provide temporary signs and a link via a QR code for visitors to fill out the survey, but only from Memorial Day to Labor Day. Recreational use occurs at and around the project on a year-round basis. To develop an adequate picture of recreational use, the signs and opportunity to complete the survey should be provided for at least a full calendar year commencing as soon as possible to allow for collection of data early in the relicensing period. If only an online option is provided, the signs and QR codes should be placed (and monitored weekly to ensure they are not removed or defaced) on all Project and Non-Project Recreation Sites and trail entrances as shown on Figure 5.3.1.3-1. In addition, these signs and QR code readers should be placed at Town offices, their respective public libraries, and schools, at the Bowdoin College libraries and main dining facilities, and at Mid Coast Senior Health and Spectrum Generations. The Towns may have additional suggestions in this regard.

250th Anniversary Park is located within the Project Boundary. Therefore, as noted in our PAD comments, all costs, maintenance, and operations during the term of the new license, should be borne entirely by, and be the financial responsibility, of the Licensee. These should include any upgrades identified by stakeholder during the study period including improvements to the park to allow for ADA compliant access to the river.

If you have any questions, please contact Kevin Mendik at kevin_mendik@nps.gov or by phone at 617-320-3496.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Mendik', is written over a horizontal line.

Kevin Mendik
NPS NER Hydro Assistance Program Manager