TECHNICAL MEMORANDUM

To: Maryalice Fisher (Low Impact Hydropower Institute)

From: Karen Bishop (Kleinschmidt Associates)

Cc: Kyle Murphy (Rumford Falls Hydro, LLC)

Date: June 5, 2025

Re: Rumford Falls Project LIHI Midterm Review Application

1.0 SUPPLEMENTAL INFORMATION FOR THE RUMFORD FALLS PROJECT LIHI MIDTERM REVIEW

1.1 PURPOSE AND NEED

This document serves as supplemental information to the Rumford Falls Project (Rumford Falls Project or Project; P-2333) Low Impact Hydropower Institute (LIHI) Mid-Term Review application submitted to LIHI on May 8, 2026, by Kleinschmidt Associates on behalf of Rumford Falls Hydro LLC (RFH or Licensee). Per the request of LIHI on June 3, 2026, information on state endangered, threatened, or rare species within the Project Boundary or vicinity of the Project is described below and how this additional information would impact the original LIHI mid-term review application.

1.2 STATE THREATENED AND ENDANGERED SPECIES

During relicensing of the Rumford Falls Project, the Maine Department of Inland Fisheries and Wildlife (MDIFW) and Maine Department of Agriculture, Conservation, and Forestry (MDACF) provided RFH with information on state threatened, endangered, and special concern species and habitats (RFH 2022). Table 1-1 lists state species and species of concern that could potentially occur within the Rumford Project boundary.

Eight out of nine species on the list provided are bat species and are unlikely to be impacted by Rumford Project operations. As discussed in Section 4.6.1 of the Rumford LIHI Mid-Term Review application, the new Federal Energy Regulatory Commission (FERC) license has requirements to protect the federally listed bat species, the northern long-eared bat (*Myotis septentrionalis*) and the tricolored bat (*Perimyotis subflavus*), which are also state listed species (Table 1-1). Per Article 404 of the new license, the Licensee must avoid removing trees of any size on Project lands from April 15 through October 31, unless emergency tree removal for public safety is necessary. If emergency tree removal is required, the Licensee shall notify United State Fish and Wildlife Service as soon as practicable following the tree removal. These protections would also protect other bat

species utilizing trees within the Project boundary. Other Project operations would have no effect on state listed bat species.

The Creeper (*Strophitus undulatus),* a freshwater mussel identified as a species of concern, is unlikely to be adversely affected by the flow regime changes described in Section 4.1 of the Rumford LIHI Mid-Term Review application. The Rumford Falls Project continues to operate as a run of river and has minimal impoundment fluctuations. Additionally, the Middle Dam Bypass Reach has increased from a minimum flow of 21 cubic feet per second (cfs) to 200 cfs, which would likely benefit the Creeper, if present in that river reach.

Table 1-1 State-Listed Species and Species of Concern identified as potentially occurring with the Project Boundary

Common Name	Scientific Name	Status
Creeper	*Strophitus undulatus*	Special Concern
Little Brown Bat	*Myotis lucifugus*	Endangered
Northern Long-eared Bat	*Myotis septentrionalis*	Endangered
Eastern Small-footed Myotis	*Myotis leibii*	Threatened
Big Brown Bat	*Eptesicus fuscus*	Special Concern
Red Bat	*Lasiurus borealis*	Special Concern
Hoary Bat	*Lasiurus cinereus*	Special Concern
Silver-haired Bat	*Lasionycteris noctivagans*	Special Concern
Tri-colored Bat	*Perimyotis subflavus*	Special Concern

Source: RFH 2022

Additionally, MDACF provided a list of botanical species from the Maine Natural Areas Program regarding state-listed threatened, endangered, and special concern species, critical habitats, and other important natural communities that may occur in the Project vicinity (Table 1-2). MDAFC stated that there were no rare species within the defined Project Boundary. As such, there would be no impact to these species from Project operations.

Table 1-2 Rare Botanical Species that may occur within the Project Vicinity

Common Name	Scientific Name	State Status	State Rank	Habitat
Auricled Twayblade	*Neottia auriculata*	Threatened	S2	Non-tidal rivershore (non-forested, seasonally wet), forested wetland
Fern-leaved Foxglove	*Aureolaria pedicularia*	Special Concern	S3	Dry barrens (partly forested, upland), hardwood to mixed forest (forest, upland)

Common Name	Scientific Name	State Status	State Rank	Habitat
Few-flowered Spike-rush	*Eleocharis quinqueflora*	Special Concern	S2	Non-tidal rivershore (non-forested, seasonally wet)
Fragrant Wood Fern	*Dryopteris fragrans*	Special Concern	S3	Rocky summits and outcrops (non-forested, upland), Alpine or subalpine (non-forested, upland)
Sandbar Willow	*Salix exigua*	Endangered	S1	Non-tidal rivershore (non-forested, seasonally wet)
Slippery Elm	*Ulmus rubra*	Potentially Extirpated	SH	Hardwood to mixed forest (forest, upland)

Source: RFH 2022

State Ranks:

S1 - Critically imperiled in Maine because of extreme rarity (five or fewer occurrences or very few remaining individuals or acres) or because some aspect of its biology makes it especially vulnerable to extirpation from the State of Maine.

S2 - Imperiled in Maine because of rarity (6-20 occurrences or few remaining individuals or acres) or because of other factors making it vulnerable to further decline.

S3 - Rare in Maine (20-100 occurrences).

SH - Possibly Extinct and known from only historical occurrences but still some hope of rediscovery.

1.3 CONCLUSION

Based on the discussion above, the additional information on state threatened, endangered, and special concern species would not change any of the proposed 2026 LIHI Recommended Standards. State listed species would either experience no impact from Rumford Project operations and/or is protected under existing regulatory framework.

2.0 REFERENCES

Rumford Falls Hydro LLC (RFH). 2022. Rumford Falls Hydroelectric Project (FERC No. 2333-091) Final License Application. September 2022. Accession No. 20220929-5165.