#	Date	Commenter	Org.	Location	Message
1	10/14/2024	Rev. Bill Gregory	(First Parish Church)	Yarmouth	I write to convey appreciation for your good research regarding dam removal on the Royal River. The river, its estuary, Casco Bay and the Gulf of Maine join me in joyful expectation of increased health for the environment, flora and fauna and citizens when the project you recommend is completed.
2	10/10/2024	Christine Force	Royal River Alliance	Yarmouth	The Royal River Alliance is a membership organization of local Maine residents who are committed to restoring the health of the Royal River and its ecosystems. We advocate for dam removal because Yarmouth's two dams are decaying, serve no purpose, and block fish passage. The fishways that were installed in the 1970s are outdated, and do not provide fish passage for targeted species. The dams sustain a six-mile stagnant impoundment. The Royal River dams in Yarmouth block sea-run fish from accessing the Royal River Watershed. But restoring fish passage is not the only reason the Royal River Alliance supports dam removal. Dam removal **Improves Water Quality:** Freeing the stagnant river to flow naturally cools the water and increases oxygen levels, resulting in a healthier river for aquatic life. Dam removal **Enhances Climate Resilience:** Free-flowing rivers adapt better to temperature changes and reduce the risk of flooding. Dam removal **Supports Fishing:** As river herring return to the region, they rebuild ocean groundfish stocks, which support local fishing industries. Dam removal provides long term **Cost Savings and Safety Benefits:** Removing the dams eliminates long-term maintenance and repair expenses, and dam related hazards. Dam removal **Boosts Recreation:** Post-dam removal, canoeing, kayaking will continue to be enjoyed, while fishing and nature-watching opportunities will increase, attracting more Royal River visitors. Dam removal **Enhances Natural Beauty and Community Pride:** Removing the decaying dams will unveil natural features like bedrock outcroppings and waterfalls, enhancing the scenic beauty. Restoring the Royal River offers more opportunities for community engagement and a deeper connection to the river. Dam removal is a **national and global movement:** Grants and other funding sources are available to help cover the costs of dam removal, making it feasible and accelerating the restoration process. Dam removal on the Royal River has been studied for more than 20 years. We think it is time to move from study to action. Free the Royal and free the fish.

#	Date	Commenter	Org.	Location	Message
3	10/16/2024	Christine McDuffie	(Abutter)	North Yarmouth	I attended the October 9 meeting in Yarmouth with the Army Corps of Engineers where I was surprised to hear the Corps state that the Royal River has a "hard bottom" from which silt is regularly flushed with the natural movement and water flow. I live on Hennings Way in North Yarmouth on property which goes down to the Royal River and have kayaked the stretch from Route 9 down to the area behind the Yarmouth Historical Society on Elm Street. I have observed the river to be almost entirely "soft sided" with its steep banks hardly containing any rocks or ledge outcroppings. Rather, most areas show shore side erosion and exposed roots which I always felt explained the turbid, brown and muddy condition of the water in the river. I am not necessarily opposed to dam removal, but I would like an explanation of where the Corps found the river to have a hard bottom and where that hard bottom occurred. Was it really in the North Yarmouth stretch of the river, or did I misunderstand the testimony at the October 9th meeting? Were samplings of silt at the bottom of the river taken from sections of the river in North Yarmouth all the way upriver to Route 9? If so, where could I find an explanation of the results? Response from USACE: Thank you for your email. Appendix B of the draft Detailed Project Report includes the reports describing the sediment sampling that was completed for this study. I will pass your question on to the team member who can address it.
4	10/15/2024	Leigh Kirchner		Yarmouth	I would like to voice my support for the removal of the dams on the Royal River. I'm pleased that the USACE could give us the information that will allow us to enjoy how the RR used to be. Looking forward the return of alewives and other migratory fish. Thank you for the information that we can remove them without worrying about environmental issues such as sediment behind the dams.
5	10/15/2024	Jim Dusch	(Abutter)	North Yarmouth	I am a resident of North Yarmouth, and my property has a few hundred feet of frontage on the Royal. At this stage of ACE work on the Royal River project, what is it that the Corps is looking for comments on? Until the study report/E.A. are done, is there anything to formally provide input on or react to? I've viewed the PowerPoint you have posted on the Website, but that doesn't seem intended to be the basis for comments. Thanks for any information and guidance you can provide. USACE response: Thank you for your email. The public comment period gives the community the opportunity to review the draft report, so that there is transparency in how the study team reached the tentatively selected plan. It also provides people the chance to ask questions about the project that might not be answered in the report, to voice concerns or to express support for the study. The review is completed on the draft report so that the comments and questions received during the review period can be incorporated into the final report. You can find all of the draft documents (the main report and the technical appendices) at the link below on the USACE webpage. They are in the "Related Documents" section under "Public Review Documents". https://www.nae.usace.army.mil/missions/projects-topics/royal-river-aquatic-ecosystem-restoration-study/
6	10/16/2024	Ryan Galway		Freeport	My name is Ryan Galway and I live in Freeport ME. I am a whitewater boater and a member of American Whitewater. I am commenting because I frequently paddle the whitewater section which will be impacted by the removal of the dams on the Royal River. I attended the recent public informational meeting on the removal project and was sadly disappointed with the lack of

#	Date	Commenter	Org.	Location	Message
					consideration for whitewater recreation on this stretch of river. I see this as an amazing opportunity to restore the river to its natural flow state and greatly improve the water quality and potential for whitewater recreation. Without the dams this stretch would see the addition of new rapids which are currently submerged by the back up behind the dam, as well as a new rapid where the bridge street dam is located. Currently when we paddle this stretch there is a portage around the bridge street dam with very poor access to launch below the dam and still allow the ability to paddle the rapids above the bridge. Removal of the dam would both add recreation milage as well as improve the safety of access to this stretch. To my knowledge whitewater boating is one of the few activities that actually physically uses the river in this stretch and should be a top consideration for a reason to remove the dams and improve river access. I also feel the town would benefit from increased revenue in the town from boaters coming to use the river and spending money at a local gas station, brewery or restaurant after paddling. I would ask that you take a look at the recent economic impact at Franklin NH which has installed a whitewater feature on the Winnepisauke river and how it has brought recreation dollars to the region. I will end with sharing a couple of videos that my son has made about paddling the river so you can get a true idea of the current recreational value as well as the bright future that we could have without the dams. https://youtu.be/kL11FTXuCmg?feature=shared https://www.youtube.com/watch?v=HTDzqTb8zSQ Response from USACE: Thank you for your comment on the Royal River Yarmouth ME Section 206 Aquatic Ecosystem Restoration study. We did not include information about white water paddling of the Royal River in the draft report. But can add information to the final version of the document. During the public meeting that was held on Oct 9th, a gentleman who was interested in white water recreation mentioned that there was a report on the topic. Were you that person? And if so, do you have access to the report that includes information about white water paddling on the Royal River?
7	10/17/2024	Bob Nasdor	American Whitewater		I am writing to you on behalf of American Whitewater regarding the plan to restore the Royal River in Yarmouth through the removal of the two dams. I attended the public information session and provided comments expressing concern that the presentation on the environmental assessment and recommendations failed to consider much less reference the impact on whitewater boating opportunities in the project area. I also expressed concern regarding whether the project will require certification by Maine Department of Environmental Protection under Section 401 of the Clean Water Act. Whitewater boating is an existing use in the project area protected under the Clean Water Act and Maine water quality standards. In addition, I offered to share our publication with you "Integrating Recreational Boating Considerations Into Stream Channel Modification & Design Projects", which I have attached. The environmental assessment limited its analysis of impacts on recreational boating to flatwater paddling on the impoundments behind the dams. Omitted was any discussion of through paddling over whitewater rapids between or over project dams and waterfalls. As indicated by comments at the public meeting and written comments. Whitewater boating is an important recreational use in the project area that is adversely impacted by the dams under consideration for removal. This section of the Royal River is included in American Whitewater's National Whitewater Inventory at https://www.americanwhitewater.org/content/River/view/river-detail/883/main .

#	Date	Commenter	Org.	Location	Message
					Low-head dams like those under consideration for removal present a significant safety hazard for downstream paddlers. Low-head dams are referred to as "drowning machines" because of their potential to create recirculating currents that prevent escape. Additionally, the presence of ledge at the base of dams can result in significant injury. We regard the removal of the dams in the project area as important for the restoration river connectivity, fish passage, and recreation opportunities. Given the excellent recreational access at various points, adequate parking, and riverwalk, there is the potential for this dam removal project to have a positive economic impact on the community through the creation of a natural whitewater park over a 1.3-mile section of the Royal River. It is important for the Army Corps to consider how the removal plan will impact whitewater boating opportunities. While I would expect that removal of the dams would enhance these opportunities, removal must be done in a way that minimizes river hazards. As discussed in the attached paper, we want to assure that the removal does not expose whitewater boaters to entrapment hazards that could be life threatening. Additionally, removal presents the opportunity to enhance recreational use through flow chalization or modifaction. It is importtant for the Army Corps to consider how the river hydrology following dam removal will affect whitewater boating opportunities. I would be happy to schedule a time wiith you to provide the Corps with a more complete understanding of whitewater boating use in the project area and discuss ways in which this projects can enhance future recreational use of the Royal River. KO to USACE: Whitewater boating could be taken into account in the future design of the diversion structure at Middle Falls. As currently envisioned in Appendix E (Engineering) at p. 17, it might be an obstruction that paddlers could hit while travelling downriver.
8	10/18/2024	Patrice McCarron	Maine Lobstermen's Ass'n	Casco Bay	The Maine Lobstermen's Association (MLA) is writing to share concern raised by MLA members who fish Casco Bay that the removal of two dams on the Royal River may negatively impact the lobster resource and marine environment. Established in 1954, the MLA is the oldest and largest fishing association which advocates for a sustainable lobster resource and the fishermen and communities that depend on it. The continued stability of the Maine lobster fishery is integral to the success of Maine's coastal economy, and the economy of the Casco Bay region. According to Maine's Department of Marine Resources (DMR), the lobster fishery in the greater Casco Bay regional supports 679 commercial lobstermen and 107 student lobstermen. In 2023, Cumberland County lobstermen landed more than 11 million pounds of lobster worth $59 million. The value of lobster landings in Cumberland County peaked at $94 million in 2021. It is imperative that the impacts of the proposed dam removals on the region's lobster fishery and marine resources are well understood. The MLA strongly urges the Army Corps of Engineers and the Town of Yarmouth to consult with the Maine DMR to ensure that the Casco Bay ecosystem and the fisheries it supports are not put at risk by this project.

#	Date	Commenter	Org.	Location	Message
					The MLA shares the goal of supporting the return of alewives and other native anadromous fisheries to the Royal River, however, it is imperative to ensure that any potential projects do not threaten the health of Casco Bay or the livelihoods of the commercial fishing families who depend on it.
9	10/21/2024	Steve Ryan	(Abutter)	Yarmouth	Numerous questions were posed and a few were going to be answered later. I assume you are still working to answer a few of those. Is that correct? One that was posed that should be easily answered is what numbers of alewife would the Royal River be expected to see when compared to the state of Maine as a whole?
10	10/22/2024	Marianna Tupper		Falmouth (former Yarmouth)	I am thrilled to learn that the USACE has made recommendations for restoring the Royal River in Yarmouth, Maine! For 15 years I lived in Yarmoiuth hearing about the frustrating situation: no alewives, few clams, and people with mixed views. Hooray for progress: getting the old infrastructure out of the way so the waterway can flush and flow again. This is clearly a decision with the "long view" in mind. Thank you for your careful attention. This area's natural beauty is clearly only going to increase.
11	10/22/2024	Barbara Merson	(Abutter)	North Yarmouth	I am a resident of 621 Sligo Road, North Yarmouth, Maine. My property has frontage on the Royal River. I kayak, canoe, board, and walk next to the section of the Royal River that is under the jurisdiction of the town of North Yarmouth. I have the following comments/questions about your proposed plan: 1) At the informational meeting in Yarmouth, one of the findings that was presented was that there would be no impact on recreational boating on the Royal River. Yet at a previous meeting, your water expert stated that there would be portages in four areas of the Royal River if the dams were to be removed. Please explain how the addition of four portages where there currently are none leads to a conclusion that there would be no impact on recreational boating. 2) Your report addresses the change in water level in the river, but does not assess the amount of blown down vegetation in the river and how this, in combination with the lower water level, might have an impact on recreational boating. In particular, stand up boards have fins that are particularly sensitive to being caught in blow down. the lowering of the water might well make the river impassable for boards. Please comment on how you have studied this topic. 3) While the town of Yarmouth controls the dams in Yarmouth, a large part of the river that will be affected by the dam removal is in North Yarmouth. Have you examined the legalities of one town taking unilateral action that has a significant adverse impact on another town? Is this something a Federal Agency has the right to do? Does it meet the ethical standards of the Army Corps of Engineers? 4) The North Yarmouth Town Council has acknowledged a number of potential issues for North Yarmouth residents if the dams are removed including potential loss of the river as a recreational resource, potential loss of property values, potential loss of wells, potential loss of fire prevention outlets that use the river, potential loss of attractiveness due to expansion of river banks. Who is responsible if any or all of these things happen as a result of taking down the dams? Has the potential cost of remediation been factored into both the Army Corp's and town of Yarmouth's share of the costs?

#	Date	Commenter	Org.	Location	Message
12	10/22/2024	Martin Kremer	(Abutter)	North Yarmouth	I live on the river at about the halfway point up the impoundment and am disheartened by the entire process of the push to "restore" the natural state of the Royal. The river has been altered in some state or another for so long that no one can claim to know what the "natural" state is. Right now we've got riverine mammals and birds and amphibians in abundance; fish are scarcer but the birds find them- I've seen eagles flying low with small fish in their talons. Dropping the river 5 to 8 (or 4 or whatever) feet will eliminate habitat. There are 2 ponds at the 2.5 mile point (upstream from Elm St) that are home to beaver and birds. They'll disappear. The rallying cry has been "bring the fish back". When Yarmouth and the RR Alliance started this they had a long list of anadromous fish that would return to the Royal- starting with salmon and sturgeon and ending with alewives and elvers. (Never mind that the Royal will never be fast or cold or deep enough for the larger species, especially when it's 4 feet lower). The only target fish being discussed now is alewives, and ACE projects 25,000 fish will be able to reach spawning grounds? At a cost of over five million dollars? Expensive fish indeed. The projected solution makes no sense to me. Take the Bridge St dam down, fine, and then see what fish come up to Middle Falls. They need help there? Fine, fool around with the falls and see who goes further. Then remediate the Elm St ladders- there's plenty of room for ponds. Or lower the Elm St dam a couple of feet as a compromise. Or build up a set of rapids or rock ramps against the downstream face of the Elm St. dam to give the fish something they can climb. Lowering the river will just result in a seasonal muddy stream at best. Recreation concerns have been given short shrift- at low water, like now, I'll hit snags with my canoe paddle that at normal levels I can't touch. Drop that 4 feet and there will be no passage through the blowdown and sunken trunks. Never mind the 4 portages forecast (and the muck bottom between them), there will be no way to pass on the river unless it's high enough (in which case it'll probably be too fast to be safe. Does Yarmouth want to assume the liability for someone getting caught and drowned in a strainer?). All comments by ACE and Yarmouth that claim that recreation will not be substantially affected are wishful thinking at best, and patently false in reality. Yarmouth started this initiative over 10 years ago. Why is the town council only now reaching out to North Yarmouth to "work together"? Yarmouth, the Army Corps and North Yarmouth should be collaborating on a solution that benefits all users of the river.
13	10/23/2024	Michael Sears		Yarmouth	I am a resident of Yarmouth and a fish biologist, specializing in fish passage and involved with other current dam removal projects in the State. I am also very familiar with the fishways at the dams and have lead the volunteer effort to restore them and make them operational again.

#	Date	Commenter	Org.	Location	Message
					I do support the removal of the two dams, but DO NOT support the town paying for any of it for the following reasons: 1 - there is abundant availability of existing federal funds that could be applied to this project 2 - the benefits of removal in this particular river system, when considering that the fishways are now operational, are not worth the cost of removal. To expand on the second point, most of the upstream habitat available for alewives (and American shad) is in the two dam impoundments, as they require slow water lake habitat for spawning and rearing. There is also not natural passage into sabathday lake for any species other than American eels. Regarding searun trout and potentially salmon if ever present in the Royal again, these species can easily use the existing fishways. This means that removal of the dams would not really provide much benefit to searun species, as long as the fishways are maintained. It is actually not very expensive and takes very little effort to operate and maintain the fishways, and I would be happy to train a town employee or two on what is required to do so. The function of the fishways has never been properly evaluated. The Stantec report was very surficial and rudimentary in its Fishway evaluation, and other studies never actually tested the effectiveness of the fishways. In addition, DMR fish numbers showed that high numbers of fish used the fishways when stocking was done upstream with fish from the Androscoggin river. This stocking created the larger run, which has dwindled to a very small run that spawns below bridge st dam for the last few decades since stocking ceased. We have documented that this small runs of alewives and other fish do use the fishways when they are maintained properly. It should not be assumed the fishways are not functional or effective if these fishways have never been properly evaluated. The dam also provides flood and erosion control for this very flashy river system, which I also don't believe has been fully evaluated. I know there are many other benefits to dam removal, but this is a small river system and these are very low head and low impact dams with functioning fishways. In my professional judgement, I do not believe the town's resources should be spent on this project, which would provide little environmental benefits. It would be much more economical to assign a town employee or two to maintain the fishways. I understand there may be costs associated with maintaining the dam, outside of the fishway, but I am not clear if the town is actually required to maintain the dam itself. It seems it would fail slowly and naturally without having much impacts downstream, and am not sure if the Corps has evaluated that or not. If the cost of dam maintenance is higher than removal. Then removal makes sense, so I think this should be made clear to the residents in the decision process.
14	10/23/2024	Josh Hamilton		Yarmouth	I am writing to express my strong support for removing the dams on the Royal River as per the Army Corps of Engineers recommendations. As a member of Trout Unlimited and an avid fisherman, but also as a professional scientist who has closely

#	Date	Commenter	Org.	Location	Message
					followed the scientific evidence for the impact of such dam removals on the environment, I believe this is the best course of action for the town and the state. It is also in line with the values and stated environmental goals of the town and state, and as you know is also part of a national and international effort to restore such rivers and their watersheds to a more natural and environmentally positive and sustainable state. I wholeheartedly endorse this proposed course of action and urge you and your colleagues to facilitate this process as quickly as possible.
15	10/23/2024	Sylvan Vogel		Yarmouth	As a Yarmouth resident, trout United member, Royal River Alliance member, fisherman, and general outdoor enthusiast: I support the dam removals on the Royal River
16	10/24/2024	Deb Debiegun		Yarmouth	I am writing with my support for removal of the dams along the Royal River in Yarmouth, Maine. As a resident of Yarmouth who highly values supporting our local ecosystems which, in turn, support us, I'd like to see the dams removed. The water quality improvements from dam removal will support fish populations and therefore also fishing recreation. Though change is hard, and indeed river front property and roads will be significantly altered, the longer-term benefit is in our collective interest, both financial and environmental. Maintaining the dams is costly and their presence has recreation hazards. Removing the dams would allow the town to make progress on their climate resilience plan, which includes minimizing the risk of flooding. We can look to many other towns and areas who have removed dams both in New England and worldwide to see the benefits of restoring the natural flow of a river.
17	10/25/2024	Gordon Clark	(Abutter)	Yarmouth	I know you've already heard the following comments from me in your public meetings, but I thought that I should submit them formally as I understand from Karin Orenstein that our Town Councilors will be made aware of any comments that come in before they make any decisions. So, I write this email, not to change your or others' minds within the USACE, but rather to make our Town officials aware of my concerns as they weigh possible, additional benefits of what Karin is calling TSP+. The TSP would leave the northern part of the East Elm Street Dam in place. Blocking the northern branch of the Royal River, which flows around Gooch Island, would result in degradation of the ecosystems of both the river (by causing standing, potentially stagnant water) and the island (by allowing year round access rather than the usual 1 to 2 months in the summer when the river is low). It is surpisingly ironic that what is identified as an "Aquatic Ecosystem Restoration" would allow for desecration of parts of that ecosystem. An additional concern is that this northern branch of the river is a favored fishing ground for the endangered Black-crowned Night Heron. We have a once-in-centuries opportunity to restore the Royal River to its original, natural, Abenaki state. We should take full advantage of this opportunity by removing the dam in its entirety. I do appreciate that you and the Army Corps recognize, "This action would allow a continuous flow of water through the back channel of Gooch Island and would eliminate future O&M costs to maintain the section of dam." Thank you and all your colleagues within the USACE for collaborating with the Town in this historic undertaking.
18	10/27/2024	Liz Armstrong		Yarmouth	I am a Yarmouth resident and I support the removal of dams on the Royal River. Restoring the flow means a return to the river's natural state therefore encouraging recovery of natural species. I believe this action will have long lasting benefits for nature.

#	Date	Commenter	Org.	Location	Message
19	10/28/2024	Thomas Cox		Yarmouth	I write in support of the Army Corps of Engineers recommendation for the removal of the Bridge Street Dam and the opening of the North Elm Street Dam on the Royal River in Yarmouth, Maine. These two dams no longer serve any useful purpose. The mills which they once powered are long gone and the Bridge Street Dam's utility for electricity generation ended years ago. History shows that the Royal River once had a major alewife habitat and natural habitat for other species as well. Experience with other dam removals has shown that when fish passage is restored to these rivers, other wildlife like birds who feed on the fish also rebounds. Removal and/or opening of these dams will remove fish passage obstacles and will allow dissolved oxygen levels in the river to rebound and thereby facilitate the restoration of the natural fish species which once thrived in the river. I have read comments in opposition to the removals/openings of these dams. They seem to come from a few property owners with land along the river. Such opposition from a self interested few comes not at all close to outweighing the benefits by the public at large which will be realized from the dam removals/openings and restoration of the natural environment. I have also heard opposition from the owners of the marinas located in the Royal River basin. Their opposition used to be based upon concerns about polluted sediments being released into the harbor. Now your work has established that there is no such risk. Thus, the opposition of the marina owners is no longer credible. It is clear that the removals/openings of these dams will greatly benefit not only the natural environment of the Royal River, but also will benefit Casco Bay into which the river flows by restoring and rebuilding fish species that naturally populate the bay.
20	10/28/2024	Matt Streeter	Trout Unlimited, Sebago Chapter		This letter provides the comments of Sebago Chapter of Trout Unlimited (TU) on the Royal River, Yarmouth, Maine Section 206, Aquatic Ecosystem Restoration Draft Integrated Detailed Project Report and Environmental Assessment dated October 2024. Our members fish in and otherwise enjoy the Royal River watershed, and have long been involved with the efforts to restore it. We appreciate the work that was required for you and your staff to produce and deliver the excellent presentation given at the October 9, 2024 meeting in Yarmouth and the report itself. Sebago Chapter strongly supports adoption of the tentatively selected plan and urges all Yarmouth residents to do so as well: • Removal of the Bridge Street Dam & Fish Ladder o Removal of the entire fish ladder and o Removal of the entire dam (275 ft) • Removal of the East Elm Street Dam & Fish Ladder o Removal of the entire fish ladder o Removal of 120 LF of dam on the right descending bank • Construction of a Diversion at Middle Falls o Placement of large boulders to increase flow to the side channel o Monitoring and additional actions as needed to improve fish passage

#	Date	Commenter	Org.	Location	Message
					These actions will work to restore the ecological health and productivity of both the watershed itself and that of the estuary and Casco Bay. With climate change working against us, these measures could not come at a better time. While alewives are the species of greatest interest, restoring connectivity to the lower river will also benefit a host of species including commercially important American eels and other important coastal species including smelt, sea lamprey and a variety of minnow species. Removing the dams will also increase oxygenation and improve the water quality of the lower river and the trout fishery there. Removing the Bridge Street Dam will restore a riffle and pool just above US Route One that will provide additional fishing locations at the tail of the riffle and head of the pool. TU has not given up on restoring Atlantic salmon to the watershed that your presentation noted had been formerly abundant. The spawning area for this species was undoubtedly Collyer Brook, a tributary in the northwest corner of the watershed with a cold underlying aquifer that has been documented by the USGS, and whose headwaters are the location of two Maine State fish hatcheries. Once the plan is approved, we will redouble our efforts to get landowner permission to remove the dam near the confluence with the mainstem that blocks access for all fish. With or without Atlantic salmon, removal of that dam will reconnect Collyer Brook and improve the entire watershed as trout habitat, eventually leading to a decrease in the need for artificial stocking. The four-foot drop in water levels in the impoundment above Elm Street will cause some problems for abutters. We trust that the cultural resources mitigation monies will be used to mitigate those types of issues. One of the concerns that came up as a question following your presentation was 'why won't the agency sign a hold harmless agreement for any pollution subsequently discovered in the estuary after the dams are removed.' This question was hard to answer after the clean bill of health your report gave the sediments in the lower river. TU thinks this point was a red herring as there would be no 'smoking gun' linking any pollution subsequently found to the removals. That this is a dynamic system that flushes sediments and other materials through periodically provides additional assurance. Again, TU strongly supports your tentatively selected plan and hopes to see it adopted for implementation by the Town of Yarmouth in the near future.
21	10/29/2024	Emily Bryson	(Abutter)	Yarmouth	I am writing to express my questions and concerns regarding the proposed Royal River Aquatic Ecosystem Restoration project, as outlined in the draft feasibility report and accompanying appendices. While I support the project's overall goal of improving fish passage and restoring the river's ecological health, I have some reservations based on the information presented. **Sediment Transport and Water Quality** **There were some inconsistencies in the quality control results for the sediment analysis**. The matrix spike/matrix spike duplicates were not within the acceptance criteria for PAH, PCB, Pesticides, and Metals. The RPDs were not within the required acceptance criteria for PAH, Pesticides, and TOC. Surrogate recoveries were not within the required acceptance criteria for pesticides. **Question:** What are the implications of these inconsistencies? Do they affect the validity of the sediment analysis results? **Question:** What steps will be taken to address these inconsistencies?

#	Date	Commenter	Org.	Location	Message
					One of my primary concerns is the potential impact of sediment transport on water quality downstream of the dams. While the report suggests that the volume of sediment available for transport is relatively small, it also acknowledges that fine-grained sediments, especially clay, can remain suspended and travel significant distances. Given that some sediment samples have shown elevated levels of contaminants like mercury and PAHs, I would like to request further clarification on the following: • What specific measures will be implemented to monitor and mitigate the potential downstream transport of contaminated sediment during and after dam removal? • How will the project ensure that water quality standards are maintained in the estuary and harbor areas, considering the potential for long-range transport of fine-grained contaminants? • Will the project consider sediment remediation options, such as dredging or capping, if monitoring reveals significant downstream contamination? **River Levels and Recreational Activities** The report projects a significant drop in water levels upstream of the East Elm Street Dam, particularly near the Yarmouth History Center canoe launch. This raises concerns about the impact on recreational activities like paddling, swimming, and fishing in this area. I would appreciate it if you could address the following: • Will the project consider alternative designs or mitigation measures to minimize the impact of lowered water levels on recreational activities? • How will the project ensure continued access to popular recreational spots, such as the rail bridge used for jumping and swimming, considering the projected reduction in water depth? • Will the project assess the potential changes in river flow rates and their impact on paddling safety, particularly in high-flow conditions? **Nonstationarity in Streamflow Data** The report mentions the presence of nonstationarities in the monthly streamflow record but states that no nonstationarities were detected in the annual average streamflow. This discrepancy raises concerns about the completeness of the nonstationarity assessment and the potential for missed trends in the annual data. • Could you please provide further details on the methodology used to assess nonstationarity in both monthly and annual streamflow data? • Will the project conduct a more comprehensive analysis of potential nonstationarities, considering the acknowledged limitations of the current assessment? **Projected Streamflow Changes** The report presents conflicting findings regarding projected streamflow changes. The literature review cites mixed projections, while the CHAT analysis suggests increasing annual mean flows. This uncertainty raises concerns about the reliability of the projected streamflow changes and their implications for the project's long-term effectiveness.

#	Date	Commenter	Org.	Location	Message
					• Could you please elaborate on the reasons for the conflicting projections and clarify which projections were used to inform the project's design and evaluation? • Will the project's adaptive management plan address the potential for significant deviations from the projected streamflow changes? **The report defers final identification and evaluation of historic properties until after project approval, when additional funding becomes available during the Design and Implementation phase.** **Question:** Could this approach lead to delays or cost increases if significant historic properties are discovered during the later stages of the project? **Question:** What are the potential consequences of not fully addressing historic property concerns until after project approval? In addition to the concerns and questions listed above, it would be helpful to have a better understanding of the following: • **The adaptive management plan:** The report mentions an adaptive management plan, but it doesn't provide much detail. What specific strategies will be included in this plan? How will the plan be monitored and evaluated? What are the triggers for adaptive management actions? • **Long-term monitoring:** What are the plans for long-term monitoring of the project's effects on the Royal River ecosystem? What parameters will be monitored, and how frequently? • **Public engagement:** How will the public be kept informed about the project's progress? What opportunities will there be for public input and feedback throughout the project lifecycle? • **Contingency planning:** What contingency plans are in place to address potential unforeseen challenges or issues during project implementation? Thank you for your time and consideration of my concerns. I look forward to your response and continued engagement on this important project.
22	11/3/2024	Andrea Berry et al.	North Yarmouth Select Board	North Yarmouth	The Select Board of North Yarmouth, ME is writing to provide comments on the Tentatively Selected Plan (TSP) for the potential removal of the Bridge Street and East Elm Street dams on the Royal River and the reconfiguration of flow at Middle Falls. As neighbors to Yarmouth, we understand the importance of careful deliberation over this plan, which will have significant and lasting effects on the Royal River and the communities it passes through. We value the opportunity to contribute to this decision-making process and to share both the benefits and concerns expressed by North Yarmouth residents. We also know that a written comment cannot ever fully convey our Town's complex perspective on this issue, and so we additionally offer to attend a joint meeting of the North Yarmouth Select Board, the Yarmouth Town Council, and the Army Corps of Engineers to discuss the perspectives and concerns of both our Town and our residents. **Environmental and Ecosystem Restoration** There is support from some of our residents for the dam removal project for its potential to restore the historic health of the Royal River ecosystem, especially to aid migratory fish species such as the alewife. The re-establishment of these natural pathways is crucial for enhancing biodiversity and improving the river's ecological resilience. This is an important opportunity to restore the river

#	Date	Commenter	Org.	Location	Message
					to its more natural state, with benefits that will ripple throughout the watershed. We also have heard support from some residents for a middle ground approach, leaving one or both of the dams and repairing and improving the fish ladders, focusing on the alewife as the target species for restoration. If the dams are removed, the planned re-seeding and vegetation of the newly exposed riverbanks up to the top of the impoundment will be critical for the restoration of ecological health of the river, especially in efforts to reduce overgrowth of "invasive" plant species. We ask that Yarmouth bears the financial and management burden of this restoration process. We are encouraged by the potential long-term ecological benefits of this project and would support efforts to ensure a smooth transition to a healthier river. **Recreational Concerns** At the same time, residents in North Yarmouth have raised valid and important concerns about the potential disruption to recreational activities on the river. Kayaking, canoeing, and paddle boarding are popular along the Royal River, and dam removal is projected to result in stretches of the river becoming too shallow for these activities without the need for portage paths and management of current and future blowdowns. We believe it is essential that the Town of Yarmouth considers and addresses these impacts, particularly by committing to fund the dredging or management of the river in areas where this would reduce the need for portage. Ensuring continued recreational access is critical to maintaining the river as a shared resource for both our communities. **Financial and Infrastructural Impacts** Beyond recreation, North Yarmouth residents are also concerned about the potential financial and infrastructural impacts of the dam removal, with specific concern coming from abutters. Changes to the river flow could affect our floodplain, potentially leading to increased flood risks for certain properties, with corresponding impacts on home insurance rates. We also anticipate changes in property lines and tax assessments due to altered river frontage. One specific concern is the loss of dry hydrants that currently serve four homes in North Yarmouth. These dry hydrants are important for fire safety, and we would like to see a clear plan for replacing or compensating for this lost infrastructure. Given these financial implications, we expect Yarmouth to partner with us in seeking grant opportunities and to explore shared financial responsibility for any necessary adjustments or mitigation for properties in North Yarmouth. We believe that a cooperative approach will help both towns manage the costs associated with this transition. **Questions and Requests for Consideration** As this process moves forward, we ask that the following key questions be examined in detail: 1. **Re-seeding and Vegetation of Exposed Banks**: What is the plan for re-seeding or vegetating the exposed riverbanks up to the top of the impoundment in North Yarmouth? Will Yarmouth commit to paying for this ecological mitigation? 2. **Recreational Access**: What commitments will Yarmouth make to maintain safe and convenient recreational access, including potential river dredging and blowdown management to reduce portage needs?

#	Date	Commenter	Org.	Location	Message
					3. **Floodplain Impact**: What will the long-term impact on floodplain boundaries be, and what role will Yarmouth play in mitigating increased risks for North Yarmouth residents? 4. **Property and Tax Implications**: How will property lines and taxes be adjusted for North Yarmouth properties affected by changing river frontage? Who will bear the cost burden of these adjustments? 5. **Dry Hydrant Replacement**: What specific plans will be put in place to replace or supplement the dry hydrants that are important to fire safety for certain homes in North Yarmouth and will Yarmouth cover the costs for this piece of infrastructure? **Joint Committee on Royal River Recreation and Ecology** As a reflection of our shared commitment to the future of the Royal River, we are pleased to participate in the newly proposed Joint Committee on Royal River Recreation and Ecology. This committee, which will be a collaborative effort between the Towns of Yarmouth and North Yarmouth, will serve as a platform for addressing concerns related to recreational and environmental impacts resulting from this project. We appreciate Yarmouth's partnership in establishing this committee, and we look forward to working together to ensure that the river remains a valuable resource for both towns. In closing, we understand the significance of this decision for Yarmouth and North Yarmouth, and we appreciate the careful consideration being given to the potential impacts. We hope to see a solution that balances the ecological restoration of the river with the practical needs of our communities. Please let us know if a joint meeting would be of interest. North Yarmouth is committed to being a constructive partner in this process, and we look forward to continued collaboration as the project develops.
23	11/5/2024	Brian Ericson			Please move forward with this important ecological initiative and remove this dam that no longer serves any purpose.
24	11/4/2024	Bill Dunn		Yarmouth	I support dam removal, but I support removal of all of both dams. Partial removal of the East Elm Street dam will result in continuing maintenance costs and liability for the town, besides messing with the water flow around Gooch Island (let's keep it an island). Please do the whole job, not just part of it.
25	11/4/2024	Susan Parrish Carter		Yarmouth	I am in favor of removing all the dams on the Royal River. Whereas I do not personally know landowners who will be directly impacted by the dam removals, those I have spoken with have stated their opposition to the dam removals based on their own real estate and investment expectations. I would like to remind the town, as a long time resident, that my own interest in restoring my town's river to its natural, healthy, state is as important to consider as the private financial plans of a handful of landowners. Considering how many people use and enjoy the Royal River Park, improving the habitat of the river potentially will enhance the experiences of park users. If we could also remove the tangle of invasive plants on the banks, we could say we truly restored the river to its natural state.
26	11/4/2024	Tom Armstrong		Yarmouth	Removal of these dams is cost effective, reduces long term maintenance risk and directly improves marine habitat and sea run species. Dam removals on other Maine rivers have proven to dramatically enhance multiple fisheries and supports marine fishery ecosystems in the gulf of Maine. Having lived in Yarmouth for 39 years, I know this watershed well and encourage you to move forward with the recommendations for dam removals. Please vote yes.

#	Date	Commenter	Org.	Location	Message
27	11/4/2024	David Craig		Yarmouth	My thanks to the New England District of the U.S. Army Corps of Engineers for this opportunity to comment on the USACE's ROYAL RIVER YARMOUTH, MAINE AQUATIC ECOSYSTEM RESTORATION STUDY and the associated tentatively selected plan (TSP). I am writing to you in strong support of the TSP. The Royal River, the second largest river to pour into Casco Bay, is a historic habitat for several species of anadromous fish. Unnatural obstructions created by the Bridge Street Dam, the East Elm Street Dam, and human-caused modifications for industry at Middle Falls almost completely impede fish passage today. Two poorly designed and ineffective fish ladders exist at the dams, but even with recent renovations by a volunteer group, fish passage is limited to tens of individual fish. For several years, the Town of Yarmouth and many residents of the town and the region have desired to restore the river to a more natural state. Opposition to river restoration has been mostly based on fear that the removal of the dams will impact one or more of the following: · Increased sediment transport that would negatively affect the harbor and river channel, require more frequent dredging. · Sediment contaminated with toxic chemicals that would come downriver and be deposited in dredging areas requiring costly special disposal of dredged materials. · Decreased water depth upriver of the dams that would adversely affect recreation (boating, canoeing, kayaking, skating, etc.) · Cost of dam removal to the local taxpayers · Various other concerns about effects on exposed riverbanks, invasive species, effects on existing water access sites, aesthetic impacts, etc. In the past 2 decades, numerous studies have been conducted, and they showed that if the dams were removed, the amount and toxicity of the river sediment should not be of concern. Studies also indicated that the decrease in water level would not greatly impact recreation. Unfortunately, opponents of restoration always questioned the validity of the studies, ignoring the mounting scientific *and* anecdotal evidence that restoration of the Royal River would have minimal negative effects. Therefore, it is no surprise that the Royal River Yarmouth, Maine Aquatic Ecosystem Restoration Study report, after extensive study, has also concluded that the best, most cost-effective way to restore the fish and wildlife habitat of the Royal River is to remove the Bridge Street and East Elm Street dams. The study also addresses the other concerns beyond the topics of sediment amount, sediment toxicity, and water depth. The results, analysis, and conclusions of the report show that dam removal will have no long-term negative effects on any aspect of the river, with a couple of narrow, minor exceptions: · Median water levels may drop below 1.5 feet in 3 or 4 locations making canoeing more challenging at median and lower wafer levels. · Increased velocity upriver of the North Yarmouth town line may make ice less likely and that would likely eliminate skating in that area.

#	Date	Commenter	Org.	Location	Message
					Cost is always a concern. The 65/35 cost sharing arrangement is advantageous to the Town of Yarmouth, and it is expected that private funding and grants will constitute the Non-Federal Share (NFS) so that the local taxpayers do not bear restoration costs. As noted earlier, I am in strong support of the TSP. My only concern with the TSP is the effect on Gooch Island that will result from partial removal of the East Elm Street dam. The TSP will result in Gooch Island becoming Gooch Peninsula with no flow of water in the north channel around the island. I understand how the Army Corps came to select partial removal of the East Elm Streed dam instead of full removal. The calculus of the cost-benefit analysis is based entirely on fish passage quantity per dollar spent. Removal of half the East Elm Street dam will allow as much fish passage as full removal -- and partial removal is less expensive. Though I agree that fish passage is the greatest overall benefit of river restoration, it is not the *only* benefit. Ignoring other beneficial factors, such as habitat connectivity, in the cost-benefit analysis has led to the unintended consequence of selecting a TSP that will lead to the degradation of the natural environment and wildlife habitat of Gooch Island. I expect that the Town of Yarmouth will address this problem by notching the dam or by removing more of the dam than is planned for in the TSP. This locally preferred option will maintain Gooch Island in its present state, but entirely at the expense of the Non-Federal Share partner, which is unfortunate. I call on the New England District of the U.S. Army Corps of Engineers to amend their TSP to include such measures as are necessary to maintain Gooch Island as an island and not as a peninsula. Lastly, and more than anything else, I want to thank the New England District of the U.S. Army Corps of Engineers, their staff, and especially project manager Ms. Janet Cote. The USACE is viewed by all the local stakeholders as a knowledgeable, neutral, trusted third party. The clear, thorough, and definitive results, analysis, conclusions, and recommendations in this report will enable Royal River restoration to move forward after years of controversy and delay. The resulting free flowing, healthy river, full of alewives and other fish species, and fit for numerous recreational opportunities will be a legacy enjoyed by generations to come. It is also a fitting tribute to the Abenaki and other Indigenous tribes, the first people who lived near or traveled along the river and utilized it for food, water, transportation, and for the habitat it supported.
28	11/4/2024	Danielle Barschdorf		Yarmouth	My name is Danielle Fisher Barschdorf and I have been a resident in Yarmouth for twenty years. I have also been a middle school science teacher at North Yarmouth Academy for 21 years. I am in full support of the dam removal in the Royal River. I fully support the Royal River Alliance and their support of the removal of the dams. In my years as a science teacher, my 7th grade students study the Royal River and the water quality, as well as the biodiversity of the river. I am in full support to restore the river to its original state to increase the biodiversity of the fish and other creatures along the river. It is good for our ecosystem and our community. The science is sound. Freeing the Royal River creates a domino of benefits to restore the river ecology. I fully support the removal of dams in the Royal River as a resident and educator. Please let me know if you have any questions.

#	Date	Commenter	Org.	Location	Message
29	11/5/2024	Art Bell	State rep.	Yarmouth	The Royal River has been good to us in the 300+ years since European settlers arrived, and for many hundreds of years before that for Native Americans. For all these years we have been asking the question: ***"What can the Royal River do to enhance human life"?*** But today, for the health of our planet Earth, we need to ask another question: ***"What can we do for the health of the Royal River"?*** Restoration of the Royal River and its ecosystem is long overdue. The most effective way to restore the Royal River and rejuvenate the ecosystem is thru dam removal. Healing starts with dam removal. Nature will do the rest.
30	11/5/2024	emilygraymurray@gmail.com		Yarmouth	I live at the end of the river on Grist Mill Lane. I'd like to hear more about if this project puts the properties on this street at greater risk for flooding. If so, what mitigating factors can be included in the project to offset the greater risk. If this has been discussed could you point me toward where I can find more information?
31	11/5/2024	Peter Lindsay		North Yarmouth	I am a resident of North Yarmouth and I strongly support the proposal to remove the dam in Yarmouth. While I appreciate that many are fearful of the changes, I support returning the river to its origins, opening the river again to fish migration, and improving the water quality. I also am a supporter of Friends of Casco Bay, and I believe the proposed changes will benefit the bay as well as the river. I support the efforts to find grants to remove the aging dams.
32	11/5/2024	Richard Snow		Yarmouth	I'm very much opposed to this project! It is extremely expensive and not necessary. From your own report it will not make a significant impact on fish stocks unless significant changes upriver are also completed. This will impact the ecosystem significantly since we know that there is a lot of uncertainty in the hazardous waste that is being held back by the dams. We know the water is not being contaminated because of the required dredging of the river to keep it clear for use by boats both commercial and recreational. The impact could cause hundreds of millions of dollars in damage to the ecosystem down river. Please don't waste our scarce resources and leave the dams alone!
33	11/5/2024	Ronald Scott Smith	(Royal River Alliance)	Yarmouth	I am 100% in favor of removing the Elm Street and Bridge street dams. The entire Elm street dam should be removed, for both visual and white water recreation usage. The left side of the river has a natural slide / falls that should be a runnable feature of this waterfall. I would like to understand the details of altering the middle falls. Are we sure that this is necessary, and if it is altered , will it still be a runnable section of the river . I've been a whitewater kayaker and paddle boarder for many years, and the usual rule is never run any rapids that are man made, unless altered by experienced white water course designers. I am a board member of the Royal River Alliance, and a yarmouth Maine resident. I am also here to help in any way that I can.

#	Date	Commenter	Org.	Location	Message
34	11/5/2024	Carl Wilcox		Minot	3-page letter + 2 attachments: 2024.11.05 TSP Comments.pdf, fishinginmaine-013 tourist report.pdf, ME_AmShadSFMP_2020.pdf Bulk of letter: I organized and led in the summer of 2022 a water quality monitoring study of the East Elm Street Impoundment. The work plan was reviewed and approved by Maine DEP. The data was subsequently reviewed by Maine DEP and entered into its water quality monitoring data base. The study found that the impoundment is in non-attainment with its water quality classification for dissolved oxygen. I disagree with several assessments of the resource impact from dam removal. **Socioeconomic Impacts:** The presence of the dams impacts the ecology and economy of the entire watershed. The Town of Yarmouth comprises a small percentage of the watershed. There may be very limited socioeconomic impacts in Yarmouth but for the upstream watershed communities there will be positive economic impacts. A member of the USACE stated at the October 9th public meeting that he had heard that fishing for sea run trout (salters) is excellent below the Bridge Street dam. That is a true statement. Maine IFW stocks the Royal River with brown and brook trout. From personal observation I have seen fish fall over the Bridge Street dam becoming dazed and eaten by herons. Presumably, the majority of the trout that fall over the dam survive, some of which return in the fall when the river water temperature drops. Those returning salter trout are trapped below Bridge Street dam resulting in good salter fishing. If the dams were not present, a good portion of those salter trout would make it into the upper watershed towns of North Yarmouth, Pownal, Durham, New Gloucester, Auburn, and Gray. All of which would benefit economically by the fishermen catching salters and other sea run sport fish such as shad. Attached is a study commissioned by the Maine Office of Tourism and Maine IFW: Fishing in Maine 2013 a Statewide and Regional Analysis of Participation and Economic Contributions. That study found that open freshwater recreational fishing had a $245 million economic impact (2013 dollars). It was determined that the Greater Portland and Casco Bay Region of the study, that included most of the Royal River watershed, open water freshwater fishing had a $21 million a year economic impact. The statement that there will be no socioeconomic impact from dam removal is incorrect. Returning passage of sea run fish that has been absent for more than 160 years will have a positive socioeconomic impact to upstream communities. Particularly, with the return of shad that are a good sport fish. **Hydraulic & Hydrology** The impacts are listed as long-term neutral. Removal of the Elm Street dam will lower the 100-year flood height by a few inches in the River Bend neighborhood. The FEMA maps show a handful of River Bend homes will flood by a few inches. Elm Street dam removal may result in those homes not flooding in a 100-year flood and no longer require flood insurance. The long-term hydraulic impacts will be beneficial.

#	Date	Commenter	Org.	Location	Message
					East Elm Street Dam Removal The river left section of the East Elm Street dam should be removed. Below the dam on river right there appears to have been a channel blasted from the rock. That has altered the river bed channelizing the river flow below the dam. This channelization may result in greater difficulty for shad to pass through the upper falls. The hydraulic modeling suggests that if the entire dam were removed, the channel on the river left of Gooch Island would continue to receive flow during the upstream fish migration season. The flow path to the left around Gooch Island has a much lower gradient more conducive to shad than the channel on river right. Attached is the Maine Department of Marine Resources Management Plan for American Shad. The Royal River watershed is identified as the sixth largest shad habitat in Maine. The entire Elm Street dam should be removed to make available all the historical fish passages for shad up through the upper falls. If the entire dam is removed, there will be no question that the best shad passage is available. For the amount of money spent over the last 15-years evaluating the removal of these two dams, the cost to remove the left side of the dam is trivial. The removed stone blocks can be placed along the river left riverbank to armor that bank. If there are extra stones, they can be placed on Gooch Island for children to play on.
35	11/5/2024	Susan Prescott		Yarmouth	I'm writing today to voice my full support for dam removal here in Yarmouth. Removing the dams will vastly improve water quality in the Royal River while also restoring fish migration. Dam removal is critical toward the goal of increasing climate resilience. Thank you for all of the research and outreach that continues to be done in this effort.
36	11/6/2024	Rob Wood		North Yarmouth	I am a strong advocate for dam removals on the Royal River. I believe the Army Corps has done a wonderful job researching possibilities and analyzing the effects. I have lived in North Yarmouth for 45 years. I would love the river to run free. It would increase the life of all animals nearby. If there are shallow areas that might need to be portaged, so be it. I believe real estate values will not be altered and perhaps there will be more resiliency in flooding. The dams serve little purpose and cost money to repair. Take them out.
37	11/3/2024	Len Kaminow	(Abutter)	North Yarmouth	1. The report does not discuss upriver sediment exposure. My property abuts the river and the river bottom consists of several feet of mud/muck and not the described bedrock that is in the report. Historically, the river drained farmland, and industry. There may be toxins in the mud which the study does not address being confined to the bottom in proximity to the dams. Will there be testing of the new exposed upriver sediment? Who will finance any required remediation? 2. The report states there will be NO change in the floodplain without going into detail. With a reduced depth of 4 feet, the river capacity will increase significantly, so that future flooding will be reduced. Flood insurance is a considerable expense and the floodplain mapping should be addressed for upriver abutters. 3. With the lowering of the river depth, we are expecting the water table to be reduced. There is little or no mention in the report regarding this with any objectivity. We have a superficial dug well and if the well runs dry because of the dam removal, who is going to pay for a new well to be dug since it will be no fault of our own?

#	Date	Commenter	Org.	Location	Message
					4. With increased water flow, the report estimates erosion will occur. This will have an effect on the river, water quality, including tree falls and sediment spread. Beside seeding of exposed sediment are there any provisions for maintaining the riverbank such as tree removal?
38	11/5/2024	Tammy Kenney Bevins		Yarmouth	I would like to voice my opinion in favor of removing the dams in Yarmouth on the Royal River. First of all, they were built for a specific purpose and are no longer of use. Secondly, I think they are unattractive to look at - manmade walls of crumbling concrete. I would much rather look at Mother Nature's beauty. Thirdly, if we can help establish a healthy fish population, we know that will have a positive effect on the surrounding ecosystem in relation to the food chain. FYI- In the 24 years that I've lived in Yarmouth, I have never seen a fish in the fish ladder. Thank you for your efforts to "free the Royal River."
39	10/29/2024	Matthew Muzzy		Yarmouth	This letter was prepared to support removal of the two downstream-most dams on the Royal River in Yarmouth, Maine. The dams serve no apparent purpose, and their removal would return that portion of the Royal River to a condition more similar to its original, natural condition. Beyond simply breaching the dams (assumed near the river's thalweg) I would ask that USACE consider removing the entire length of each structure to a crest height no more than 30-inches when measured from the adjacent downstream side. The 30-inch height is consistent with many residential building codes for decks and porches. Both dams are in residential areas and attract adventure seeking children; those same seekers will likely be just as fascinated with the remains of the dams after breaching. So, to that end, I strongly believe safety should prevail over economy for each. of the dam removals.
40	11/6/2024	Michael & Solvejg Makaretz		Yarmouth	We strongly support the restoration of the Royal River watershed through removal of the Bridge St. and Elm St. dams. The environmental and community benefits have been well stated elsewhere and the fact based decision making process appears to have been as thorough and responsibly done as possible. We urge the Town Council to unanimously vote in favor of proceeding with dam removal and river restoration.
41	11/6/2024	Jerry King		Yarmouth	I have advocated for removing the Royal River dams in Yarmouth for over 25 years. First, as a member of the Yarmouth Land Trust, then as a founding board member of the Royal River Conservation Trust (RRCT), and later as a Royal River Alliance board member. It is worth highlighting that RRCT was a merger of conservation groups from towns along the Royal River with a clear mission to "**Free the Royal**" and restore habitat up and down the river. In those early days, dam removal was not just a "Yarmouth problem." The town of Yarmouth owned the dams, but reviving the river was seen as a project that would benefit all towns on its banks. We are now at a critical juncture regarding dam removal. This is a perfect opportunity for RRCT, RRA, and other interested conservation groups to work with the Town of Yarmouth to support the Royal River restoration project. Yarmouth is not alone in this pursuit! The more we work on this together, the better the outcome!
42	11/6/2024	Cynthia Rankin			We are looking forward to seeing the Royal River flow freely again. Please approve of the removal asap.

#	Date	Commenter	Org.	Location	Message
43	11/7/2024	Joyce R. Cassidy		Yarmouth	As a long-time resident of the Greater Portland area, and Yarmouth resident for the past 4 years, I URGE you to favorably pass any and all votes needed to move forward with the removal of the dams on the Royal River which are now under consideration. My passionate support for this stems from a life-time focus on caring for the earth, our most precious resource; from my firm belief that most environmental damage is caused by human intervention in the natural cycle and state of earth processes; from my frequent enjoyment of the River here in Yarmouth (nearly weekly walks all year, and swims during the season). I have also followed along with the information secured over years of careful study. I believe the benefits will FAR OUTWEIGH any potential downside outcomes. And the investment in a future of cleaner water, and a more abundant fish and wildlife environment are well worth the costs. PLEASE move forward with this important project!
44	11/7/2024	Chris Franklin		North Yarmouth	Thank you for this opportunity to weigh in on the recommended management changes of two dams on the Royal River. As an avid fisherman and naturalist I have long considered the river to be a shadow of what it once was. For the past 150+ years the former fish runs have all but been eliminated. While once a vital economic asset the current dams have no economic value and it could be argued that their continued existence should be considered a liability. Over the past fifty years our nation has begun to recognize that certain practices such as clearcutting, open pit mining and dam building have wreaked havoc on our natural ecosystems. We have also grown to understand that intact, health ecosystems are far more resilient to natural disasters and extreme weather events. For the health of our waters, for the health of our sea run fisheries for the health of our planet more than justify the need to restore this once wild river so we may be able to begin healing our past abuse of this common resource. The rivers of Maine belong to the people of Maine for their collective benefit. Currently the dams provide little if any benefit whereas their removal may well have significant benefit to our local and regional environment. I greatly appreciate the time and effort taken to thoroughly evaluate options for the future management and removal of the dams and am entirely in support of freeing the more than 100 miles of upstream riverine habitat and allowing this watershed to naturally begin the process of restoration.
45	11/7/2024	Darthea Cross		Yarmouth	I am a Yarmouth resident and I strongly feel that the dams SHOULD be removed. I think we should return the river to its natural state for the fish, the ecology and to avoid any future long term maintenance/cost on the dams.
46	11/7/2024	Tom McAteer		Cape Elizabeth	Hi, I write this in support of removing the old dams on the Royal River. This is an opportunity to help the ecology of Casco Bay by having more fish spawning . Fishing will improve greatly for our youth and families.
47	10/29/2024	John Sevee		Yarmouth	As a resident of Yarmouth, I am writing in support of the removal of the two dams on the Royal River in Yarmouth Maine. Both dams have been in a general state of disrepair for as long as we have lived here. The dams represent a safety concern, especially to the kids that play along the river. Access to the dam structures is unrestricted and, although rare, I have observed kids playing on and below the dams in the past. The dams are aging structures and will slowly continue to degrade due to river flows and ice damage. At some point, the dams will require major repairs or upgrades to prevent erosion, fracturing, collapse, undermining by water, and natural weathering of these

#	Date	Commenter	Org.	Location	Message
					structures. In order to keep the dams, they will need to be inspected annually and repaired. Inspections are needed, not only to protect the public, but to mitigate the Town's potential liability for damage or injury caused by the dams. These two dams serve no practical purpose, as they once did, and only represent a future financial liability to the Town of Yarmouth. The dams do not currently serve a practical purpose. They were designed to support former industries on the river, but these industries no longer exist. Because of the shallowness of the dams (i.e., their limited heights and impoundment depths) they serve no real benefit for flood control. In fact, if they were to fail from their current unkept state, they could cause flooding damage or harm that the Town could be held liable for. The dams do not enhance any environmental benefits that would not continue to exist without the dams. In fact, their presence impedes or eliminates natural fish migration up the Royal River. In summary, as a now-retired engineer that formerly designed and built dams, these two Yarmouth dams will only cost the Town money with no practical benefits.
48	11/7/2024	Matt Craig	Casco Bay Estuary Partnership		3-page letter Highlights: The Royal River is one of the largest freshwater sources to Casco Bay, but in many ways, the estuary is cut off from the Royal and its tributaries owing to Bridge Street Dam, alterations to the river at Middle Falls, and East Elm Street Dam. The Town's two dams alone disconnect Casco ay from over 15% of the Casco Bay watershed. Continuity of the river's aquatic habitats is fragmented, and the dams interrupt natural riverine processes such as the transport of cold water, flood water, sediments, and wood while severely constraining the seasonal movement of aquatic organisms such as anadromous fish and eastern brook trout into critical habitats. Dams directly alter riverine habitats, converting free-flowing coldwater river reaches to warm-water impoundments, degrading water quality and shifting ecological communities toward generalist stress-tolerant species assemblages. The history of the lower Royal River, like many of Maine's waterways, includes extensive modification to accommodate river-based industries and commerce. Today, this industrial legacy is most evident at Bridge Street Dam and East Elm Street Dam, but other anthropogenic impacts, such as fill of riparian corridors, floodplain loss, hardened riverbanks, altered ledge, and remnant mill structures in the waterway are also important factors to evaluate in achieving the study's stated goal of restoring river habitat and fish passage. In commissioning USACE to conduct this study, the Town of Yarmouth focused restoration planning on the two dams. However, the footprint of anthropogenic alterations to the Royal River in the lower reach is more extensive, and the cumulative impact of these alterations needs to be taken into consideration. Middle Falls, the site of a former mill and dam, was a late addition to the study – effectively, it was an afterthought - and consequently, resources to assess this critical river feature were extremely limited. Unfortunately, the limited availability of resources to study Middle Falls has resulted in general statements about this area that fail to account for the complex history of alterations. Early in the October 9, 2024 public forum hosted by the Town at Patriot Insurance Company, a USACE presenter stated that "Middle Falls presents a natural barrier to fish passage." Yet, there are clues, such as sharp linear features across the face of the

#	Date	Commenter	Org.	Location	Message
					ledge, that suggest the exposed bedrock at this location was cut or blasted to support the Forest Paper Company Mill. Furthermore, a review of historic maps and photographs suggests that at this location, the riparian corridor and the riverbed itself, may have been filled, perhaps to channelize water into the mill. Rather than assuming that Middle Falls are in a natural state, it seems more reasonable to assume that they are in an altered condition. The other part of USACE's statement – that Middle Falls are a barrier to fish passage - is also worth reevaluating. During alewife stocking efforts dating to the 1980's and associated monitoring of fish returns, the Maine Department of Marine Resources documented alewives returning to the Elm Street Dam fish ladder during spring migration runs, which by necessity, means that the fish were able to pass beyond Middle Falls. While Middle Falls is likely an impediment to fish movement at different flow conditions, particularly for weaker swimming species, there is documentation that alewives were able to traverse the falls several decades ago. At best, considering the resource constraints for this site in the current USACE study, it seems premature to classify Middle Falls as either "natural" or a "barrier to fish passage" at present. Later in the 10/9/24 forum, USACE stated that the channel adjacent to Middle Falls had been modified, as evidenced by the presence of granite blocks removed several years ago and remaining linear features in the bedrock. This is also noted in the draft report. These confusing statements, which seem to conflict (was Middle Falls altered, or not?), point to the need for additional assessment of Middle Falls to better understand the location and extent of river alteration in this location, as well as the effects alterations have had on movement of aquatic organisms, particularly anadromous fish species. Anadromous fish are critical to both estuarine and riverine ecosystems, and are important prey for cod, haddock, and other marine finfish that were formerly abundant in Casco Bay and the Gulf of Maine. Today, the distribution, abundance and composition of anadromous fish in the Bay and its watershed is greatly diminished from levels of the past. Anadromous fish used to have access to all of the primary freshwater rivers flowing to the Bay, including the Royal River, but today, access to historic habitat is severely limited, particularly due to derelict main stem dams in close proximity to Casco Bay. Restoring anadromous fish requires addressing dams and other barriers to passage into critical habitat. The Casco Bay Estuary Partnership believes that fish passage in the Royal River watershed will contribute to the restoration and protection of Casco Bay. The nature of our partnership precludes us from taking a formal position for or against a specific approach to river restoration at Bridge Street Dam, Middle Falls, and East Elm Street Dam, however, we are supportive of efforts to restore access for anadromous fish throughout the Royal River watershed and aquatic habitat continuity between the watershed and Casco Bay. The Casco Bay Plan 2024 (Action 1.3.B, p. 25) states that, "Dam removal is effective at achieving fish passage and other ecological outcomes and is preferred to other strategies such as construction of fishways," and specifically identifies the two Town-owned dams on the Royal River as habitat restoration priorities: "Highest priority dams are those on main stem rivers that lack functional fish passage and are at or near head of tide along rivers and streams home to historic spawning habitat for anadromous fish. These include Bridge Street Dam owned by the Town of Yarmouth, Elm Street Dam also of Yarmouth, and the Stroudwater Dam owned by the City of Portland." Historically, the Royal supported diadromous fish populations, including American eel, shad, Atlantic salmon, and river herring (blueback herring and alewives). Sea-run trout have also been well documented here. USACE chose to analyze restoration outcomes using alewife as an indicator species, but dams affect all diadromous species and disrupt natural riverine processes. In

#	Date	Commenter	Org.	Location	Message
					finalizing the Report, the Corps should not lose track of other, well understood, beneficial effects that dam removal would have on restoration of riverine habitat, habitat continuity and resident and migratory fish assemblages in the Royal River and in Casco Bay. Combined with past industrial uses, the Royal's two dams have contributed to declines in sea-run fish, with negative impacts to commercially important near shore and offshore fisheries. Today, the Royal River presents a significant restoration opportunity that would contribute to ongoing restoration efforts through the Casco Bay Watershed and the Gulf of Maine.
49	11/7/2024	Michael Leacher		Yarmouth	I am a resident of Yarmouth, Maine, and I'm writing in support of the proposal to remove the dams on the Royal River. These dams no longer serve the purposes for which they were built, and now stand in the way of the river returning to its natural state and hosting a population of fish and other wildlife. Other dam removal projects, in Maine and elsewhere, have been very successful, including the nearby Presumpscot River, and I believe that removing the dams on the Royal River will be just as successful. As a proud supporter of two local conservation trusts, the Royal River Conservation Trust and the Cumberland Chebeague Land Trust, I urge you and other interested parties to go ahead with this project and free the Royal River!
50	11/10/2024	Susan (Suzy) Gifford		Yarmouth	I support efforts to remove the dams from the Royal River and follow the recommendations outlined by the US Army Corps of Engineers and the Royal River Alliance. The primary driver of restoring the Royal River to its natural flow appears to be environmental, which I certainly support. However, I think it is important to consider the concerns of a variety of stakeholders and proceed in a way that causes the least harm, especially to the environment and to the health and safety of all, particularly to residents and businesses directly abutting the river and those in other towns who may abut the river and its tributaries. Any damages to the environment and to the health and safety of residents may have a fiscal impact as well, so I would like to make sure there is a way to address any potential harm so that there is little to no fiscal impact. I would also like to make sure that other options or additional enhancements are installed and carefully considered, such as installing or repairing fish ladders, installing safety precautions or structures, or installing environmental mitigation measures, such as addressing potential erosion or changes to riverbanks. In addition, I am in support of these efforts if grant funds and donations will cover the majority of the cost, so that it does not add an additional financial burden to residents.
51	11/8/2024	Dave Beers	Royal River Conservation Trust	Yarmouth	Thank you for this opportunity to offer comment on the very important topic of removal of the East Elm Street and Bridge Street dams in Yarmouth, Maine. As a member-driven conservation land trust that protects and stewards land within the Royal River watershed from its headwaters at Sabbathday Lake in New Gloucester to the estuary in Yarmouth, we want to clearly state that **Royal River Conservation Trust stands firmly for the restoration of the Royal to a free-running river by the <u>full</u> removal of the East Elm Street dam and Bridge Street dam in Yarmouth.** Rivers across the country, throughout New England, and right here in Maine respond swiftly to ecological restoration upon dam removal. We are confident the Royal River will be no exception. With Yarmouth's dams removed, the cool streams and headwaters that feed the major stems of the Royal combined with ongoing conservation of adjacent unfragmented habitat will

#	Date	Commenter	Org.	Location	Message
					benefit the watershed, Casco Bay and the Gulf of Maine by restoring an active sea-run fishery, reducing erosion and runoff, slowing the proliferation of invasive species, and improving climate resiliency. This healthier Royal watershed will provide habitat for a wide variety of animal and plant species, including those that are endangered and threatened, as well as recreational opportunities for people seeking respite from the increasingly hectic pace of life in Southern Maine. Throughout Maine, 50 dams have been removed from rivers from South Berwick to Madawaska and 288 dams have been removed throughout New England since 1988. Conversations continue throughout the state and the region regarding the removal of additional dams. These conversations include the removal of the East Elm Street and Bridge Street dams in Yarmouth. Our watershed's health is particularly important during this moment in time as climate change and rapid development substantially alter this area that we treasure. We have an extraordinary opportunity to be on "right side" of nature and to do our part in ensuring a healthy and sustainable environment for many generations.
52	11/9/2024	Linda Austin			It is my understanding the removal of the Yarmouth Dam will enhance nature and save taxpayers money. Please Remove the Yarmouth Dam.
53	11/11/2024	Robert H. Gifford		Yarmouth	I am now 92 years old and have been a summer resident on Littlejohn Island since 1936. The beauty of nature in that area, including the Royal River is what keeps me coming back year after year. I write because I am an enthusiastic supporter of the plan to restore the Royal River to its original state. In our collective effort to restore nature as much as possible, the annual migration of fish to the river would be an enormous step forward. I speak for the entire Gifford Family in strongly supporting the plan to remove the Bridge Street Dam, and partially remove the Elm St. dam and modify Middle Falls . Thank you for considering my plea and that of countless lovers of nature as it was meant to be.
54	11/12/2024	Margaret & Tom Downing		Yarmouth	We're writing to enthusiastically support the dam removal option on the Royal River. We have lived in Yarmouth for 40 years and on the Royal River for 33 years. We are members of the Royal River Conservation Trust. We firmly believe dam removal is the best opportunity to restore the river and its environment.
55	11/13/2024	Gib Parish & Sharon McDonnell		Yarmouth	14-page submission **Summary of Comments** For our family, the health of the river for future generations is the highest priority. Beyond that we believe that other important considerations should include: · 150 years of habitat development since the first dam was constructed; · the financial costs to the community for the next 20-100 years; · uncertainty about the end results of the project if the recommended (TSP) actions are taken – in terms of the passage of fish and changes to the health of the river; · impacts on recreational use; and · impact on nearby wetlands and water quality.

#	Date	Commenter	Org.	Location	Message
					The proposed measures recommended by the US Army Corps of Engineers (USACE) in the tentatively selected plan (TSP) focus heavily on fish return and habitat repair with particular emphasis on alewives without including these other considerations. We believe the objectives and future steps should consider these broader impacts with an aim to improve aquatic passage for all species within the Royal River Watershed without damaging the existing ecosystem of the Royal River. Historically, it is unclear which diadromous fish species migrated in significant numbers on the Royal River, but salmon are likely whereas alewives and shad are less certain. The river, even without the dams, poses significant challenges for migrating fish (particularly alewives), and the proposed steps to address those natural challenges seem excessive. The proposed plan is expensive and the outcome uncertain in terms of fish passage and survival and of the effects on recreation or established local wetlands. Certain measures and alternatives were not chosen or fully considered that we believe deserve more consideration. The current barriers to aquatic passage on the lower Royal River in descending order of importance are Middle Falls, Bridge Street Dam, and East Elm Dam. *We favor a phased approach to improving fish passage with evaluations after each phase to ensure success before moving to the next phase.* 1. The ledges of Middle Falls are the most challenging barrier to fish passage. To improve passage, we prefer removal of large rocks and debris from the side channel, as suggested in 2017 by USFWS. We do not favor alterations to any of the ledges of Middle Falls, including those in the side channel, nor do we favor the placement of diversion structures in the main channel of Middle Falls. Following removal of rocks and debris from the side channel, studies should assess whether fish passage has improved. 2. *If fish passage improves with the completion of phase 1*, we recommend either removal of the Bridge Street dam or the installation of natural fish bypasses (aka "nature-like fishways") around the dam with the choice based on feasibility and cost. Following dam removal or natural fish bypass installation, studies should assess whether fish passage has improved. It is important that the community understand which fish are likely to be affected and to differentiate the likelihood of each species to repopulate the river. 3. *If fish passage improves with the completion of phases 1 and 2*, we recommend the installation of a natural fish bypass (aka "nature-like fishway") around the East Elm Street dam. We do not recommend the partial or complete removal of the East Elm Street dam. Removal of the dam would disrupt the established ecosystem upstream of the dam, causing significant adverse effects to its many wetlands, including potential disappearance of some of them. Removal of the dam would produce marginal or no increase in water velocity and no significant improvement in water quality. Specific recommendations for additional studies prior to implementing any actions: 1. Prior to and following any alterations to the side channel of Middle Falls, assess the flow through the side channel from mid-April through mid-June, which is the typical period for alewife migration upriver in Maine. 2. Conduct a survey of the USFWS National Wetlands Inventory mapped wetlands within the study area that are located above the East Elm Street dam, like the survey done by USACE in the emerging left-bank wetland upstream of the Bridge Street Dam.

#	Date	Commenter	Org.	Location	Message
					3. Measure the temperature, dissolved oxygen content, pH, and turbidity at several sites in the Royal River study area above the East Elm Dam at least twice monthly during April, May, and June prior to making any final decision on the removal of the East Elm Street dam or the construction of a fish ladder or naturalized fish bypass channel at the East Elm Street dam location. This might be done with trained volunteers and standardized equipment. The USACE report describes safety issues for people walking along the river as important to decision-making. The concerns seem a bit much. Sections of the Royal River are inherently unsafe and will remain so whether any action is taken with the dams and Middle Falls. Thus, install signage and barriers, as needed and as soon as possible, at all the Royal River falls in Yarmouth, including the second and fourth falls where the Bridge Street and East Elm Street dams, respectively, are currently present.
56	11/13/2024	Jacob Bordeau		Yarmouth	8-page email with photos Highlights: **BACKGROUND** I am a professional and civil/environment engineer with a master of science degree in civil/environmental engineering. My wife Kelly Bourdeau and I (Jacob Bourdeau) are home owners in Yarmouth for over seven (7) years, and we have been visiting Yarmouth as residents of Maine for over 20 years. We moved to Yarmouth partly because it is my favorite location to fish for Striped Bass in Casco Bay, and because of the beauty, ecology, and recreational activities available here. We have also maintained a slip at a marina or a mooring in Yarmouth for at least 8 of the prior 20 years with the primary purpose of sport fishing. I have purchased freshwater/saltwater fishing licenses for over 20 years, and I am a member of a Maine-based paddle club (the Penobscot Paddle and Chowder Society [PPCS]), and a member of the National American Whitewater Association (AWA). **SUPPORT** My wife and I support the following considerations related to the draft TSP and/or with a Locally Preferred Plan (LPP) including the Town of Yarmouth, as follows: ***DAM REMOVALS*** 1. Complete removal of the two unused dams: a. to their natural state (to the extent practicable considering the development history) to promote natural fish/alewives passage and enhance the natural ecology from existing status; b. to promote enhanced recreation (e.g., whitewater recreation) along the entire section of river from the Elm Street Dam to the tide (a topic not originally considered in the TSP); c. to provide for renewed navigation in accordance with Maine Law, and Federal requirements for navigable waterways considering the historical use of the river pre-development and dam construction; d. to maintain a natural lower navigable water level (i.e., estimated by ACOE to be 4+/- feet lower) upstream of the Elm Street Dam's due to the preexisting rock formation which will continue to support recreational use of that reach by various watercraft (including canoes, kayaks, paddleboards and rafts). ***MIDDLE FALLS***

#	Date	Commenter	Org.	Location	Message
					2. Consider diverting flow at Middle Falls per the TSP only as an iterative option using the ACOE's prescribed adaptive management techniques in the event alewives do not return as desired, and only consider diverting partial river flow during months when the alewives migration occurs (e.g., May to June) using removable options for flow diversion; 3. Assess the Middle Falls bypass channel enhancement, if needed, for recreation and navigation requirement objectives in parallel with the proposed alewives season migration patterns while still maintaining navigation options for use of the main channel and river right channel. **GOOCH ISLAND** 4. Maintain potential for flow around Gooch Island at higher river flows per the ACOE model by removing the entire dam which will maintain both river right and river left channels around Gooch island. This option maintains a rare high gradient high velocity section of navigable and recreationally usable river in comparison to allowing the river left section to essentially convert to a stagnant wetland condition without dam removal. Freshwater wetland creation or mitigation can more appropriately be completed upgradient of the Elm Street Dam elsewhere in the watershed in flatter low relief areas, if needed. High gradient river sections which serve to enhance oxygenation and provide additional habitat for the desired species are rare especially, at the higher flowrates often observed in the spring/early summer when the Alewives run. ***OTHER PROJECT ENHANCEMENTS OR COST SAVINGS*** 5. Remove any protruding rebar/metal from man-made structures or installed in rocks, along the stretch for recreational and navigational safety reasons. 6. Evaluate and use the stone blocks to be removed from the Elm Street Dam for use in nearby flood protection of the residence on river left below the Elm Street dam, and reuse or sell the stone blocks for similar uses in town. 7. Further explain in the finalized TSP how the migration or scour of sediments from the system can occur at higher river flowrates to better describe the initial sediment sampling event and subsequent observations of limited sediments during the ACOE sampling compared to the Stantec sampling event. For instance, was there a significant storm event (e.g., 2-year storm?) captured on the Royal River or nearby USGS gauge(s) between the two sediment monitoring events to explain the reported sediment flushing? 8. Consider allowing volunteers to assist with a minimum of: a. Planting of the newly exposed slopes once the dams are removed; b. Evaluate recreational and navigational assessments and recreational flow studies, if, or when, needed; c. Assist with fish counts; and, d. Testing water quality, if needed. . . . . As you know, alewives are a forage species for striped bass and blue fish, and both species are known to be in decline with increasingly continually restrictive sport and commercial fishing regulations imparted to increase these fish stocks. With an increase in alewife population and activity, more recreational fisherman will want be in Yarmouth, the values of boat slips and moorings will increase, and more visitors to Yarmouth will add to the local business revenues and tax base. My scan of the Royal River Marina located at the edge of tide near Route 295, and Yarmouth's largest mooring field at Madeliene Point, shows that over 75% of the

#	Date	Commenter	Org.	Location	Message
					boats are sport fishing center consoles, with only several cruisers, lobster boats, and sail boats mixed in. This broad observation is an indicator of the value the local population places on the saltwater fishery which will be enhanced by this project. . . . . The AWA web page lists the Royal River as a Class IV rated river, and even with limited rain the last several months, the AWA River Info web page lists the Royal River in the runnable category . . . with a flow rate at 65 Cubic Feet per Second (CFS). 65 CFS is close to the 95% percentile flow reported by the ACOE in the TSP. This means that the river could be navigated by whitewater enthusiasts up to 346 days per year (i.e., much more often than not). With flows closer to the ACOE reported median of 120 CFS (at 183 days per year), this river is likely even more enjoyable to paddle, with more line options, and more rocks submerged. . . . . [Middle Falls:] Please consider alternate flow paths or hydraulic control structures that allow some base flow to go to the left channel at while still allowing recreation navigation flows to the rest of the river (e.g., maine channel and river right channel) and at higher flowrates . . . . [Elm Street:] Unfortunately, without complete dam removal there is no other nearby high gradient and elevated water velocity conditions similar to the gradients at Gooch Island to provide for oxygenated water and a riverine system, and which can flush around the left side of Gooch Island at larger flowrates. Compared to a wetland, high gradient sections of river that serve to oxygenate water are rare and difficult to reproduce without damming up rivers, and dams are what caused the Section 206 evaluation in the first place. . . . . ***OTHER PROJECT ENHANCEMENTS OR COST SAVINGS*** I with other paddlers will volunteer to inspect the river bed for random rebar which is generally considered unsafe for navigation which could be removed as part of the project to enhance recreational safety and navigability. I along with volunteers from AWA , PPCS and/or other paddling clubs, would offer to test the river at various flows and directions to determine the potential for whitewater recreation use under a safe scenario, and including paddlers trained in swiftwater rescue. We/I would offer to evaluate the river left channel at Middle Falls to enhance recreation and navigability as well. With the return to natural condition of the river level upstream of Elm Street, I would also volunteer to help with the planting of native species along the newly exposed upstream river banks, and as a requirement of the WQC Permit which will be required.
57	11/14/2024	Gail Clark	(Abutter)	Yarmouth	As the USACE further develops its recommendations for the TSP section 206 study of the Royal River, I strongly urge you to give careful consideration to the ecosphere on and around Gooch Island. This is home to many species of creatures, not only in the water, but on the land and in the air. Since April of 2024 when the USACE first unveiled its TSP, many townspeople have been very concerned about the future of Gooch Island. With this TSP, the river around Gooch Island would dry up for most of the year. This would create almost year round access to the island. Currently, there is only access to the island a couple of months per year in summer when the river is at its lowest. The increased impact that this would create on the the animals who rely on the island and the river as their home can only be imagined. As an example, ducks nest there, bringing their duckings up the sluiceway to feed and learn to fly.

#	Date	Commenter	Org.	Location	Message
					These animals deserve an advocate. Below, are only a few of the dozens of photographs that I have take this year alone. One of these species, the black crowned night heron, is on the endangered species list. Observed but not pictured below are many other birds including hawks, falcons, osprey, and sandpipers, just to name a few. Deer, muskrats, gophers, weasels, and mink live here. More than one variety of turtles, several kinds of fish, as well as eels and frogs can be found in the river. For 30 years, I have lived and worked across the river from Gooch Island. The retaining wall of the dam runs through my studio. There is no one who has observed what life is like on a daily basis here on the river more than I. This ecosphere is a gem tucked away near the town, and is a precious part of Yarmouth's park system that we should strive to preserve. If this is to be a true river restoration, shouldn't we protect all of the species that live on the river? Thank you for your consideration. [Photos and descriptions are in the email saved here]
58	11/14/2024	Emily Green	Conservation Law Foundation	Portland	Conservation Law Foundation (CLF) appreciates the opportunity to comment on the U.S. Army Corps of Engineers' (USACE) Section 206 Royal River Aquatic Ecosystem Restoration draft report (the "Draft"). We write to convey our appreciation for the completion of this important step in the process toward restoring the Royal River, and to voice our support for the Draft's findings. CLF is a nonprofit advocacy organization committed to protecting New England's environment for the benefit of all people. CLF's mission includes the conservation and protection of waters in and around Maine. CLF has long worked to restore fish passage in New England's coastal rivers, including the Royal River. *Completion of the Section 206 report is a crucial step toward mitigating the environmental harms of the dams on the Royal River* Before the 19th century, the Royal River supported populations of many fish species. Today, the East Elm Street and Bridge Street dams, both in Yarmouth, are old and in disrepair, and fragment the river ecosystem. The dams block native fish like river herring and shad from moving upriver to spawn, causing precipitous drops in the populations of those species in the river's watershed. A collapse in river herring and shad is not an isolated event—healthy populations of these fish boost the entire ecosystem as well as Maine's recreation and marine economies. Fortunately, restoration of fish passage and river habitat can have tremendous and rapid results. Given the value of restoring habitat in the Royal River, CLF is pleased that the Section 206 report is nearing completion. The Draft is thorough and comprehensive. We are grateful to the USACE for the apparent time and effort that has gone into the analysis and drafting, and for advancing this process. The report is a vital yet preliminary step in a lengthy restoration effort, and there are still many years ahead before the dams' impacts on the river will be mitigated. We are thankful to see this progress, and we urge USACE to expeditiously finalize the report to enable next steps to occur along the promptest timeline possible. *CLF supports the Tentatively Selected Plan, Alternative #2*

#	Date	Commenter	Org.	Location	Message
					CLF strongly supports not only the progress that is being made by the USACE, but the Draft's result as well. Environmental advocates have long worked to restore fish passage to this segment of the Royal River. We agree with the USACE's assessment that the Royal River is a good candidate for ecosystem restoration, and are pleased that the comprehensive analysis of 18 alternatives has tentatively landed on Alternative #2: partial removal of the East Elm Street Dam, removal of the adjacent fishway, full removal of the Bridge Street Dam and adjacent fishway, and installation of boulders at the top of Middle Falls. Importantly, the Draft's careful analysis of Alternative #2 shows that the dams can be safely removed, and that many benefits will inure to the environment and surrounding communities, with only minor short- and long-term downsides. While restoration of fish passage and river habitat is critical for fish populations and for entire ecosystems, it isn't the USACE's (or the town of Yarmouth's) only consideration. We support the USACE's conclusion that Alternative #2 would not only improve aquatic passage for all species within the Royal River watershed and restore habitat and reconnect disjointed habitats within the Royal River watershed, but also reduce the risk costs of operation and maintenance, repair and replacement of the existing dams, all while improving public safety within Yarmouth. * * * Thank you very much for your time and consideration of these comments. We ask the USACE to expeditiously finalize the report and selection of Alternative #2, and we urge the town of Yarmouth to move ahead with plan implementation and restoration activities as soon as possible.
59	11/14/2024	Anna Steffeney		Yarmouth	I'm writing to urge the restoration of the Royal River—a crucial step for Yarmouth in fulfilling its commitment to environmental responsibility and leadership. Like other towns that have acted to remove the ecological and structural damage caused by aging dams, Yarmouth must embrace this opportunity to protect and revive our watershed. The current dams on the Royal River disrupt its natural flow, compromising the river's ecological health and limiting its role as the second-largest drainage into Casco Bay. Restoring the river would be transformative for our local environment, opening the path for the return of native fish populations and restoring habitats essential for a balanced ecosystem. This isn't just an environmental "nice-to-have"; it's an urgent corrective action that aligns Yarmouth with responsible, forward-thinking communities committed to preserving our natural resources for future generations. Additionally, restoring the Royal River provides us a timely opportunity to leverage available federal funding, ensuring this critical work is achieved without adding further financial burdens to Yarmouth residents. By pursuing restoration now, we can avoid passing along ongoing dam maintenance costs and instead direct resources toward a long-term solution that benefits our community and environment alike. This project allows Yarmouth to prioritize a healthy, self-sustaining river ecosystem, reducing future liabilities while positioning our town as a leader in responsible environmental stewardship. Thank you for considering this essential project. I am confident that moving forward with the restoration of the Royal River will benefit Yarmouth, our environment, and generations to come.
60	11/14/2024	Sandra Stark		Yarmouth	I am writing to share my support for the restoration of the Royal River, as outlined in the recent habitat restoration analysis and report. As a resident of Yarmouth, I have a deep appreciation for the history of the river and the potential that lies in its restoration.

#	Date	Commenter	Org.	Location	Message
					The old mill dams on the Royal River have long served their purpose for our community, but today they stand with little benefit to modern Yarmouth. In fact, removing these barriers will open up significant ecological and economic opportunities that will benefit our environment, our community, and our future. By enabling the natural flow of the river, we can restore critical habitat, supporting local and migratory species that are vital to sustaining our coastal ecosystems. Importantly, I believe that the recreational gains achieved through restoration will outweigh the limited value of slow-water paddling that the dams currently offer. With a revitalized river, Yarmouth residents will have increased access to a range of outdoor activities and a more vibrant, natural landscape. From ecological diversity to recreational enjoyment, restoring the Royal River aligns with our values as a community that cherishes environmental responsibility and sustainability. Thank you for considering the long-term vision for our river and our community. I look forward to seeing Yarmouth take a progressive step towards a sustainable and thriving ecosystem in the heart of our town.
61	11/15/2024	Daniel (last name omitted)	(Maliseet)	Yarmouth	I have a unique perspective regarding the dams and their potential removal. I'm Maliseet and a citizen of Tobique First Nation which is an Indian reservation on the Maine/New Brunswick border. The reserve sits along the banks of the St. John and Tobique rivers which for decades served as a major source of food due to the abundance of salmon. Over the past 50 years, multiple dams were built along both rivers, and I have witnessed firsthand the devastation to the salmon population. As you can imagine, I am not a fan of disturbing Mother Earth with manmade dams. While removing the dams in those rivers is a bigger challenge, I always throw my support around dam removal regardless of location. As a resident of Yarmouth, I would love nothing more than to see the Royal River restored to its natural beauty by removing the unnecessary dams. Let's restore the river to its original condition, the way it was for generations of my Wabanaki relatives.
62	11/13/2024	William McKenney		Yarmouth	Thank you for hosting the recent informational meetings in Yarmouth and for accepting public comment. I share a similar viewpoint to some of my neighbors and hope the Corps will update and refine its final plan to include: -Complete removal of both dams and fish ladders -Revegetation of the exposed riverbank to include native shrubs such as Red Osier Dogwood, to supplement the seeding proposed by the Corps -No placement of a stone or other water diversion at the head of the Factory Island side channel -No chipping of bedrock or other mechanical impacts to the Factory Island side channel The four items above promote re-establishing a natural environment, allowing for both fish passage as it existed before the dams, together with protecting the habitat for the night heron and river dependent species around Gooch Island.
63	11/14/2024	Rebecca Sentementes		Yarmouth	I'm have lived most of my entire life in Yarmouth. I swam in the river as a kid (and got a respiratory infection), chickened out of jumping off the trestle, and rode on my Dads boat to the sea from its beautiful mouth. It's been the backdrop my life and at 63 years old I'd like to do something for it. Because I trust the work that's been done by

#	Date	Commenter	Org.	Location	Message
					people who I admire, I'd like to see the dams removed. Because it's been proven that the habitats of fish will be improved, flooding will be mitigated in the likely event of extreme rainfall and that it would harm the mouth of the river, it seems a sensible outcome.
64	11/14/2024	William Gibbon & Lisa Wilson		Yarmouth	We write in support of the USACE plan for dam removal because the benefits far outweigh the costs. We see no valid reason to maintain these obsolete structures. Removing the dams to restore the Royal River will have a lasting positive impact on the river, ocean ecosystems, and our town.
65	11/14/2024	Phil Connell		Yarmouth	I wish to send this message in support of the Royal River restoration efforts and all the great work done by Debbie Landry in this regard.
66	11/14/2024	Chris Hannah & family		Yarmouth	Thank you for the work on this. Excited to see restoration of the river take place. Full support for the dam removal efforts from the entire Hannah family here in Yarmouth. Chris, Amanda, Liam and Rowan. Keep the rivers wild!!
67	11/14/2024	Jason Mitchell		Yarmouth	I am writing to voice my support for the U.S. Army Corps of Engineers' tentatively selected plan for the Royal River, detailed in the recent feasibility report for aquatic ecosystem restoration (CEQ ID - EAXX-202-00-E6P-172863450). I commend the Army Corps for its thorough evaluation of the options for restoring riverine fish passage, reconnecting habitat, and enhancing public safety along the Royal River in Yarmouth, Maine. As the report highlights, the two low-head dams—Bridge Street Dam and East Elm Street Dam— currently obstruct fish passage, fragmenting the natural ecosystem and restricting access to over 135 miles of vital reproductive and nursery habitats. Removing these dams and installing a diversion at Middle Falls offers a unique opportunity to restore a healthy, self-sustaining aquatic ecosystem that benefits fish, wildlife, and the broader watershed. The removal plan will ultimately help address the significant operational and maintenance costs associated with these aging structures, mitigating future economic burdens on the community while promoting a natural, free-flowing river environment. The assessment clearly outlines both the long-term ecological and socio-economic benefits of this project. These benefits include enhanced fish habitats, improved connectivity for species throughout the watershed, and greater safety for the community. Importantly, this restoration will bring lasting positive impacts to recreational opportunities for fishing, along with minor, neutral, or short-term impacts to other resources such as water quality, vegetation, and local wildlife. With the Army Corps' proposed plan, the Royal River can be transformed into a thriving ecosystem, aligning with the community's long-term environmental and economic goals. I strongly encourage continued support for this recommendation and look forward to seeing the positive changes this project will bring to Yarmouth and beyond. Thank you for your dedication to this project and for your commitment to restoring the natural resources of our region.
68	11/15/2024	Lisa Small		Yarmouth	I am a Yarmouth resident writing to voice my strong support for the dam removal project. This project will help to restore and maintain a healthy ecosystem for all wildlife, especially fish that have been prevented from migrating upstream.

#	Date	Commenter	Org.	Location	Message
					The project represents an enormous benefit for not only Yarmouth, but the whole surrounding community.
69	11/14/2024	Kevin Sztam		Yarmouth	I support removal of the dams, as it would start to restore natural pathway for fish, even if there might be an issue with silt especially at the beginning. Long-term this makes the most sense given the current and likely future use of the river.
70	11/14/2024	John Auble		Yarmouth	I fully support the proposed dam removal and all other efforts to restore the Royal River to its natural state.
71	11/14/2024	Carrie Logan		Yarmouth	I am writing to express my strong support for the U.S. Army Corps of Engineers' recommendations regarding the removal of the Yarmouth dams on the Royal River. As a long-time Yarmouth resident (1978-1996 and 2012-present) and community member who values our town's environmental integrity and future sustainability, I believe this project has the potential to greatly benefit our ecosystem and community. Removing the dams would restore the Royal River to a more natural state, benefiting local fish populations, improving water quality, and enhancing biodiversity along the river. This ecological restoration would not only bring environmental benefits but would also create a more vibrant, accessible riverfront for the people of Yarmouth to enjoy. The Corps' careful assessment of the impacts on wildlife, flood control, and water flow gives me confidence that these changes would be implemented with our community's safety and well-being in mind. I also want to emphasize that the Corps has addressed the concerns raised by marinas downstream. The recommendations outline steps to mitigate potential impacts on marina operations, ensuring that local businesses are considered in the process. Additionally, the removal of the dams would still allow for aquatic recreation opportunities on the Royal River, providing both locals and visitors with continued access to the water. An added benefit of removing the dams is the improvement to public safety. Currently, people (mostly children) walk on the dams, creating a liability risk for the Town. As the dams age, this risk only increases. Their removal would not only enhance safety but also reduce potential liability for Yarmouth, protecting both residents and Town resources. I also want to acknowledge and thank dedicated Yarmouth volunteers, including Michael Brandimarte and Michael Sears, who have worked tirelessly to restore fish ladders that had been neglected by the Town for many years. Their commitment to protecting and enhancing our natural environment has been crucial in preserving local fish populations and ecosystem health. Their efforts are a testament to our community's strong desire to see the Royal River restored and improved. It's worth noting that the study conducted by the Corps was requested by the Town of Yarmouth itself. Following the Corps' recommendations aligns with the town's original intention of assessing the best ways to address the condition of our dams and river. Choosing not to act on these findings after initiating the study would disregard the time, resources, and expertise invested by both the Army Corps and our community.
72	11/14/2024	Peter Small		Yarmouth	I am writing in support of the USACE plan. As a Yarmouth resident, I believe the plan to restore health to this major component of Yarmouth's ecosystem is of vital importance. Thank you for giving this issue your utmost consideration.

#	Date	Commenter	Org.	Location	Message
73	11/14/2024	Dale Shields		Yarmouth	Please know that I am in full support of the plan to restore the Royal River. It is critical for those of us living on the banks of the river to finally be in a healthy relationship with the river, respecting its inherent right to flow freely, and with all the creatures within the ecosystem, who have the right to thrive.
74	11/14/2024	Ron Nicholas Siviski	YCARE, Yarmouth Indigenous Awareness Group	Yarmouth	I support the USACE proposal for modifications to dams on the Royal. The proposal is a good start. Our River cries for help... and health, and ought to be able to flow freely. The Royal was once a source of life. The stagnant, unhealthy water of the Royal has been a very sad story. Rivers are beings... They are alive. Water is sacred. We need to act on behalf of the River for its future. I am grateful for the proposed USACE plan, and grateful for those who have worked to get us there.
75	11/14/2024	Stephen P. Thomas		Cumberland	I am a retired Maine Saltwater Fishing Guide who lives in Cumberland and who is very connected to Yarmouth. *I am writing in support of the USACE plan because removing the dams to restore the Royal River will have a lasting positive impact on the river and ocean ecosystems.*
76	11/14/2024	Jeff Carr			First, thank you on behalf of the community for the investment of time, expertise and energy in assessing the opportunity to remove the dams on the Royal River here in Yarmouth, Maine. It is my opinion that the removal of the dams on the Royal River is not an option, but the obvious choice to be made. There is absolutely no credible argument for maintaining these dams, given that they serve no functional purpose (e.g. hydro energy production). While some in the community may be emotionally attached to the sight of the dams and the resulting bodies of water from various vantage points in town, the value to restoring the river to its original and intended form and creating a healthy and sustainable ecosystem far outweighs any such consideration. Any landowner along the river has no credible argument against dam removal, given that any drop in water level and exposure of river bank will quickly be restored with native flora and, if anything, will extend their land holding and enhance its value. The restoration of a free flowing river will benefit the fish, birds and wildlife that depend on it, but will make for a healthy, clean and simply for usable resource for the community. At present, the pools held behind the dams have very poor water clarity and I personally hesitate to swim in them given the snapping turtles I have seen in these murky depths. I trust that the removal of the dams will proceed with no further delay and am certain that the vast majority of the communities of Yarmouth and surrounding towns will celebrate the restoration of the Royal River.
77	11/14/2024	Diane Gifford		Yarmouth	I am writing to support the Army Corps of Engineers' recommendation to remove the town-owned dams and fish ladders on Bridge Street and East Elm Street. Restoring the Royal River by removing these outdated dams would enhance fish passage, improve biodiversity, and benefit the river ecosystem, bringing long-term environmental and recreational advantages to Yarmouth and nearby communities. The project’s cost-sharing with the Army Corps, along with potential grant opportunities, makes this an efficient and timely investment. I urge the Council to consider moving forward with the Army Corps’ recommendations, which would allow for a healthier river and an enriched quality of life for residents.
78	11/14/2024	Margaret Campbell		Yarmouth	I am in favor of removing the Bridge St and East Elm St Dams on the Royal River to improve the River’s ecosystem.

#	Date	Commenter	Org.	Location	Message
79	11/15/2024	Mike Ting and Amy Belisle via Counsel		Yarmouth	4-page letter from attorney saved here Highlights: A review of the EA [=draft report] reveals that the TSP, if implemented, will have negative impacts to the environment, fisheries, safety, recreation, and the aesthetic beauty of the Royal River, each of which are summarized in turn below. **Environmental impacts**. The TSP will take 4 to 6 months to complete and will involve construction of a manmade diversion in the middle of the river. This would have negative short-term impacts on the water quality of the Royal River, according to the EA. (EA § 4.3.2.) What is more alarming is that "the Royal River system may take many years to establish a new steady state. This is particularly true of the movement of sediment through the system." (EA § 4.3.2.) While the upper reaches of the Royal River are designated as a Class A river system, in Yarmouth the water quality is poorer (Class B) and the TSP is not expected to improve this water quality rating. Another concern is the effect that climate change will have on water temperatures once removal of the dams lowers the water level in the river and exposes side banks with inadequate vegetation to provide shade. Removal of the dams would also dislodge sediment in the riverbed, which past studies have revealed is contaminated. As the EA notes, sediment sampling conducted by Stantec in 2016 revealed that "[o]ne of the ten samples exceeded the threshold effect concentration (TEC) for mercury and six of ten exceeded at least one TEC for polycyclic aromatic hydrocarbons (PAHs)." (EA § 1.6.2.) Additional contamination in sediment may also be present near the CMP pole yard site on Sligo Road, which apparently has not been tested according to the Town's website. This is especially concerning given the Town's obligation to "[a]ssume . . . complete financial responsibility for all necessary cleanup and response costs of any hazardous substances regulated under CERCLA that are located in, on, or under lands, easements, or rights of way that the federal government determines to be necessary for the initial construction, operation and maintenance of the project." (EA 6.3.3.) Flooding is yet another environmental concern, with some of the most severe impacts projected to occur on the Tings' property. The EA notes that "[c]omparison at Middle Falls indicates that 1% AEP water surface levels could increase by up to 2.5- feet, however the extents are limited to largely difficult-to-access areas with no predicted adverse impacts." (EA Appendix C, p. 50.) These impacts are depicted on a map on page 172 of Appendix C to the EA. The Tings' house is also visible on the map. **Fishery impacts.** As the EA notes, there will be both short-term and long-term impacts to fisheries. In the short term, removal of the dams and construction of the diversion would increase the turbidity of the water and kill fish. While the long-term impacts may be positive for alewives, other species would suffer long-term negative impacts if the TSP is implemented, in particular largemouth bass and chain pickerel, which "would be less successful once river conditions have changed." (EA § 4.5.1.) The expected increase in water temperatures would be harmful to some trout species, which "will be stressed in the warmer environment." (EA § 3.8.2.) Further, "[t]he change in water temperature could also change the timing of migrations, with younger fish arriving at the river before they are strong enough for the upstream migration." (Id.) Even more alarming is that the TSP may not even improve fish passage. Several site-specific fish passage parameters of the TSP do not meet USFWS recommended parameters for fish passage design. The EA glosses over this unfortunate fact as follows:

#	Date	Commenter	Org.	Location	Message
					While some of the parameters in Table 10 are outside the design guidelines for an engineered nature-like fishway, the proposed natural setting at each of these sites may yet allow upriver migration through yet-undefined flow pathways, whether currently visible or post-demolition. (EA Appendix C § 5.2.4.3.) The EA assumes that 100% of alewives will be able to pass once the dams are demolished and that 70% of alewives will be able to pass after the side channel modification (EA § 1.8.) These are wildly unrealistic assumptions given that several fish passage parameters fall short of USFWS recommendations. The EA further notes that unknown bottom conditions and bathymetry immediately upstream and below the dams make hydraulic parameters difficult to evaluate: Localized depths, velocities, vertical accelerations, turbulence, and other hydraulic phenomena may affect target species behavior at a scale that is impractical or impossible for 2D hydraulic modeling to accurately predict. These factors combined make determination of fish passage routes tenuous, at best. (Id.) With admitted short-term and long-term impacts to fish species, and no guarantee as to whether fish passage will improve, the TSP fails to meet one of the stated objectives of the EA, which is to "[i]mprove aquatic passage for all species within the Royal River Watershed over the study period of analysis." (EA Executive Summary, p. ii.) **Safety concerns.** [concerns about kids jumping from rail bridge and Beth Condon walkway bridge into water that will be 4 feet shallower] **Recreational impacts.** [ice skating, snow mobiling, canoeing, kayaking and paddleboarding] **Aesthetic and Cultural Impacts.** The new manmade diversion in Middle Falls will be visible during low flow conditions and will span at least halfway into the main channel of the Royal River at Middle Falls (EA Appendix C, pp. 221-22.) Implementing the TSP will mean that the Town will lose Foundry Channel, arguably the most beautiful feature of the Royal River Park, except during higher flow events (EA Appendix C, p. 50.) The EA acknowledges that removal of the Bridge Street Dam would constitute an adverse effect upon a NR-eligible historic property and may also expose Native American archaeological sites to erosion. (EA § 4.4.) Aesthetic impacts are inherently subjective, but for many Yarmouth residents, dam removal and the resulting draw down of water levels will be an unpleasant sight. Dam removal will also eliminate key structures that are important to Yarmouth's rich history. For all of the foregoing reasons, the Tings oppose the Army Corps' Tentatively Selected Plan.
80	11/15/2024	Jaime Stowell			I am looking forward to having the river in Yarmouth, Maine restored to its natural state. The ecosystem will be much healthier and the fish will have the opportunity to swim upriver unimpeded. It is an outdated relic and I hope progress is made soon.
81	11/15/2024	Marge Titcomb		Yarmouth	We are in full and complete support of the USACE plan. Removing the dams is an important step to restore the Royal River - a lasting positive impact on the river and ocean ecosystems which are so in need of restoration. Thank you for moving this long-awaited project forward!
82	11/15/2024	Frederick Heimann			Why can't fish ladders be built like at Damariscotta Mills so the alewives can spawn and the river levels can be maintained for recreational use?
83	11/15/2024	Nathan Hicks	(Trout Unlimited)	Freeport	I reside in Freeport, Maine very close to where the Cousins River and the Royal River meet to then drain into Casco Bay. I currently sit on the board for Merry Meeting Bay Trout Unlimited, and also serve as the Director of Salter Habitat (Sea Run Brook Trout) for our organization.

#	Date	Commenter	Org.	Location	Message
					I would like to put my full support behind the removal of the dams on the Royal River in Yarmouth, Maine. This project represents a critical opportunity to restore the river's natural flow and improve habitat for both native species and our commercial fishing community. The Royal River is an essential waterway that, in its natural state, supports a rich diversity of aquatic life, including migratory fish species such as alewives, shad, and other river herring, which have been historically obstructed by the existing dams. These species play a vital role in the health of the river ecosystem and the broader Gulf of Maine ecosystem. In addition, the river's restoration is a crucial step toward ensuring sustainable commercial and recreational fisheries in the region. The current dams are outdated and no longer serve their original purpose, which are preventing fish passage and inhibiting the river's natural ecological processes. Removing these dams will allow migratory species to access upstream spawning habitats, and will help to revitalize the river's health for future generations. It is important to consider the long-term benefits to the community, the environment, and the local economy in making this decision. While some local businesses may express concern, it is vital that we prioritize the needs of the broader community and future generations over the interests of a few. A restored Royal River will not only support fish populations but will also enhance opportunities for sustainable business opportunities, improve water quality, and provide long-term ecological benefits that will serve all members of the community. The time to act is now. I urge the Army Corps of Engineers to prioritize the removal of these obsolete dams and support the restoration of the Royal River. We need to restore the natural flow of this vital waterway for the health of our environment, our fisheries, and our community. Thank you for your consideration. I look forward to your support in this important restoration effort.
84	11/15/2024	Mary Ellen Alicandri		Yarmouth	I am in favor of restoring the Royal River so that fish can use it.
85	11/15/2024	Stacey Akeley		Yarmouth	As a resident of Yarmouth, I am writing in support of the USACE plan because removing the dams to restore the Royal River will have a lasting positive impact on the river and ocean ecosystems.
86	11/15/2024	Stephen Barr		North Yarmouth	I [write] you in response to solicitation for comment regarding the Royal River Dam removal discussion. The only SANE and ethical decision that we can make in this regard is to advocate for removal of BOTH Dams that block the normal flow of Royal River water through the Town of Yarmouth. Presently, they serve no function except to restrict the flow of water which increases the temperature of the water, decreases available oxygen, and restricts the freedom of anadromous and catadromous fish. We all need to do our part to remediate global warming and the 2 dams work to decrease carbon sequestration continue to inflict pain on our local ecosytem. Please do the right thing and advocate with your whole heart and mind the removal of both of the dams. It will be the single

#	Date	Commenter	Org.	Location	Message
					most impactful thing we can do in our own backyard.
87	11/14/2024	Heather Kenyon	Friends of Casco Bay	Portland	Thank you for the opportunity to comment on the US Army Corps of Engineers' (USACE) above-referenced project report. That report includes eighteen alternative plans with the first alternative being no action and the second alternative removing the Bridge Street Dam, removing a 125 ft. portion of the East Elm Street Dam, and creating fish passage through a side channel at Middle Falls. USACE has identified Alternative 2 as the Tentatively Selected Plan (TSP). They did not identify full dam removal as the TSP because the left descending bank structure is integrated with the foundation of an adjacent residence and cannot be removed without careful design and execution.[1] For this reason, Friends of Casco Bay supports Alternative 2. We also thank the USACE for its further study of sediment, and ensuring that dam removal will not deliver toxic sediment, or notably increased loads of sediment, to Casco Bay. After heavy rainstorms, the Royal River becomes notably turbid and characterized by a brown discoloration. At times, fresh water plumes extend as far as Moshier Island, and can even be picked up by our continuous water quality monitoring station at Cousin's Island. Since 1989, Friends of Casco Bay has worked to improve and protect the health of Casco Bay and its watershed. We monitor water quality, and use that data to inform actions that include, but are not limited to, reducing pollution, restoring habitats, improving water quality and addressing climate change. In recent years, we have increased our focus on the rivers that feed Casco Bay. Healthy rivers deliver the right amount of nutrients and provide connective habitat for anadromous and catadromous fish species, waterfowl, and other biota. Unhealthy rivers, including rivers impeded by dams, disconnect habitat and lower water quality, for example by lowering dissolved oxygen levels and raising water temperatures. As the USACE's recent project report elucidates, the Royal River watershed supports anadromous and catadromous fish species.[2] Both groups of fish travel between the Bay and the Royal River during their lives. Right now, those fish cannot pass above the Bridge Street Dam. Beyond that dam, fish will be impeded at Middle Falls and then at the Elm Street Dam.[3] TSP Alternative 2 removes these barriers. The project report states that Alternative 2 will improve fish passage/connectivity, restore riverine habitat, improve productivity, and support native river species.[4] Alternative 2 is projected to restore access to 32 miles of main stem river and 176 miles of tributaries for diadromous fish and reestablish an annual alewife run.[5] Based on our current understanding of the infeasibility of fully removing the Elm Street Dam, Friends of Casco Bay supports Alternative 2. Thank you for considering our comments. [Footnotes reference pages in the draft report]
88	11/15/2024	Toby Ahrens		Yarmouth	I am a resident of Yarmouth, Maine, and I am writing to express my support for Alternative 2 detailed in the PowerPoint summary dated April 25, 2024 ("Royal River, Yarmouth, Maine - Aquatic Ecosystem Restoration Study"). Alternative 2 includes removal of the Bridge Street and Elm Street dams and fish ladders. I appreciate the thorough analysis of options outlined by the Army Corps, and it seems clear that Alternative 2 will result in the greatest benefit for ecosystem restoration (using alewife passage as a bellwether for ecosystem health). This option also appears to be cost effective for the Town of Yarmouth due to the 65% Federal cost share.

#	Date	Commenter	Org.	Location	Message
					I am in awe of the rapid recovery of upstream ecosystems in other rivers in Maine following dam removals, and I look forward to witnessing a similar revival in the Royal River. My family uses the river in many ways, including walking through Royal River Park on a daily basis, paddling upstream, fishing regularly with my children, and keeping a boat at a marina in the mouth of the river. I believe that all of these activities will be enhanced by the ecosystem recovery that is anticipated to follow the Alternative #2 restoration plan.
89	11/15/2024	Katherine Ahrens		Yarmouth	I am a resident of Yarmouth, Maine, and I am writing to express my support for Alternative #2 restoration plan as detailed in the PowerPoint summary dated April 25, 2024 ("Royal River, Yarmouth, Maine - Aquatic Ecosystem Restoration Study"). Alternative 2 includes removal of the Bridge Street and Elm Street dams and fish ladders. I walk along the Royal River every day and would love to see the river and its ecosystem restored to what it was like before the dams. Further, my sons like to fish in the river so if there are more fish and healthier fish, that would be great.
90	11/14/2024	Megan & Erik Hellstedt		Yarmouth	We are writing in support of the Tentatively Selected Plan to restore the Royal River in Yarmouth, Maine. Returning the river to its natural state and restoring fish runs will benefit the residents of Yarmouth by enhancing the natural ecosystems within our town, allowing for continued recreational opportunities, and contribute to enhanced resilience in the face of climate change. Restoring the river supports the goals of Yarmouth's Climate Action Plan as adopted by the Town Council.
91	11/15/2024	Paul Whitmarsh		North Yarmouth	I am writing a public comment in opposition to removal of the dams on the Royal River in Yarmouth, ME. The proposal leaves many questions and long term effects of the proposed project unanswered. Further, M.R.S. Title 30-A §4454 does not give authority to Yarmouth for the removal of Elm St. dam as the impoundment area far exceeds Yarmouth's town border. This burden's North Yarmouth residents with possible damage and loss of value being determined by another town's executive body. In addition to this legal obstacle, the proposal looks to create an entirely new river rather than restore the river to its natural state. This will include removal of some of the ledge that creates the falls and installing a new partial dam to provide an area of river that never existed to allow for fish to travel upstream. This project places the value of the possibility of Alewives populating a river that there is no evidence they ever populated (given the natural blockade created by the falls) over the very real damage it will do to the livelihood of the areas marinas and shellfish industries as well as the very real negative impact to North Yarmouth in terms of property value and river levels for recreation. The dam removal proposal should be abandoned. If the town of Yarmouth is interested in creating access to the river for Alewives, it should look for a less destructive means of doing so, such as fishladders.
92	11/15/2024	Nick Farley		South Portland	I wholeheartedly support all bullets outlined by Jake Bourdeau in the email sent. I am animated by this project as a whitewater kayaker, but the benefits to nature, the town of Yarmouth, and the state of Maine cannot be understated. The flow of a beautiful natural river through towns like Ashland, OR, Missoula, MT, and Boulder, CO bring international repute to these destinations. Rest assured, Yarmouth will *not* become any of these cities or towns and we don't would never want that; but it *will* become an even richer gem than it already is. The points detailed by Jake will pay themselves off time and again over the course of the next few decades, economically and in the spirit of Maine's prided natural beauty. Dams made sense at the time they were constructed. However this is a new era in which the economic interests and the natural

#	Date	Commenter	Org.	Location	Message
					interests of the river coincide--it is a win-win situation. Above all, I encourage you to undertake these projects to the full extent proposed. The inertia is here now, and it would be unfortunate to only restore these parts of the river halfway.
93	11/15/2024	Jamie Orenstein	(Abutter)	Yarmouth	I'm a Yarmouth resident. My property abuts the Royal River and I enjoy paddling there. I can see that the dams have turned the river into a long brown pond with no current. I support removing the dams.
94	11/12/2024	Dan Landry		Yarmouth	I am a resident of Yarmouth and I am in favor of the removal of the Royal River dams. Given our most recent, very large property tax increase I am concerned about liability risk to the town. The Elm St dam has a large boulder that has been dislodged and failure appears to be imminent. If that dam fails, the town is clearly responsible for its repair / restoration. In addition, I am strongly opposed to the construction of a functional fish passage. Even the best fish passages are marginally successful but more important to me is the cost of construction and the large ongoing cost of maintenance, which would ultimately be borne by the taxpayers (take a visit to Damariscotta to see what maintenance would look like). I am at a loss as to why the town is taking so long to make such an easy / cler decision. It appears the town is pandering to a very few in the vocal minority. Hypothetically, if the majority of townspeople are opposed to dam removal (which is not the case) the council still has an obligation to remove these non functional structures simply from a liability and potential cost perspective. This is not a problem that can be shuffled off to the next council given the state of dis-repair of the Elm St dam. Lastly, given the most recent property tax increase, I suspect there will be a re-ordering of the political affiliations of the members of the council. Those new members will be much less inclined to vote to remove the dams. Now is the time to vote to remove these dams.
95	11/15/2024	Steve Ryan	(Abutter)	Yarmouth	4-page letter attaching 9 pages of questions from June Summary (per letter): The draft report of the Royal River, Yarmouth, Maine Section 206, Aquatic Ecosystem Restoration fails to adequately address numerous issues. 1. Little information is provided on estimated river depth or velocity following Tentatively Selected Plan (TSP) completion during low flow conditions. Data provided is for annual mean conditions, however, the majority of recreational river usage is during low flow conditions which occur during the summer months. 2. Maintaining current parklands to include unique park features such the Foundry Channel in Royal River Park and Gooch Island are not addressed. If the TSP is completed as drafted, the Foundry Channel and the north side of Gooch Island will dry out except during heavy flow conditions. 3. The proposed revegetation plan is lacking detail. It does not address planting trees on over 5 acres of newly exposed land once the river recedes following TSP completion. 4. Little information is provided into reasoning not to look further into fish passage options at East Elm St Dam (EESD). Despite achieving fish passage and restoring habitat, fish passage options were screened because they didn't reduce Operations and

#	Date	Commenter	Org.	Location	Message
					Maintenance (O&M) costs or improve public safety, yet the TSP proposed diversion at Middle falls adds new O&M costs and risks to public safety. 5. The Town of Yarmouth has neglected the required maintenance on its two dams. The Town spent over $360,000 of dam maintenance funds on dam removal studies over the last 5 years. During this time, the town has not used the maintenance funds to care of the dams, yet cites the results of its deferred maintenance as a primary reason to support the dam removals.
96	11/15/2024	Rebecca Robich			My questions are as follows. 1. Are you 100% confident that there is not toxic sediment underneath the Bridge Street dam? Were the Army Corps of Engineers able to get a proper sample from this area? How many samples were taken? And what were the results? Were they able to take a sample deep enough? Was it statistically significant? Are you able to say with confidence that there will not be toxic chemicals released downstream upon the dam removal? What streams are using as a comparison? This was a site of industry for many years and the town needs to be confident that the people and animals and insects living downstream and upstream from this dam will not incur not negative health impacts upon dam removal. Disrupting this damn could release toxic chemicals that would then be carried downstream. This would impact the fisheries. This would impact human health. And this would impact the clamming industry in that area. 2. The fish ladders have been open for two years thanks to a wonderful group of volunteers at the Royal River Fish passage. They have documented alewives and herring migrating up the river as a consequence of their hard work to clean, update, and restore the fish ladders. It has been amazing. I want to know why you are ignoring their efforts in your reports and claiming that the fish ladders are not functional. Are you trying to mislead the public? 3. Have you been thoughtful about the impact to the homeowners on the Royal River in your report? Have you addressed this? Have you documented how it is going to change the waterfront and how we use the water on the Royal River? How much will the water recede? What will the River look like? What will be the consequence be for these homeowners? 4. Have you looked at alternative methods besides taking down the dams? Have you addressed this in your report? Have you gone to look at other rivers where they made fish passage possible while maintaining the dams? Is this an option for the Royal River?
97	11/15/2024	Jay Waterman		Yarmouth	I am a resident on East Elm Street in Yarmouth Maine just a few houses up from the Royal River. I hike next to the river, paddle the river and have been involved in land conservation efforts through the Town's Parks and Lands Committee. I am fully in favor of removing all three dams and restoring the Royal River to its pre-colonial natural state to allow better fish habitat and a healthier ecosystem in the Royal River watershed. Please do not let a few naysayers in Town stop a sound, science-based project that will benefit the Town, area residents and the wildlife in the area.

#	Date	Commenter	Org.	Location	Message
98	11/15/2024	Michael Piquero (Lobbyist)	Royal River Marina Alliance (Steve Arnold, Deborah A. Delp, Alan J. Dugas)	Yarmouth (DC)	We are writing to express our deep concerns regarding the proposed removal of the Royal River Dams in Yarmouth, Maine. While we understand the intent to restore the river's natural state, we believe there are significant risks and uncertainties associated with this project that must be carefully considered. Firstly, even if the potential for sediment contamination is considered low, the consequences could be devastating for local businesses and the river ecosystem. The cost of remediating such an event could be substantial, placing a heavy financial burden on the community. Additionally, lowering water levels may lead to increased erosion, resulting in sediment buildup under the marinas and necessitating costly dredging operations. Moreover, the project's ecological benefits are highly questionable. Historical data suggests that fish passage has been limited due to natural barriers, making the investment in a bypass system dubious. According to Maine DMR data, the herring fishery began declining in the 1960s, a century after the dams were first constructed. Furthermore, the decline in herring populations predates the dams, indicating that dam removal may not address this complex issue. It seems imprudent for community taxpayers to contribute $5,000,000 to establish a fish run when there is no evidence that a fish run ever existed in the first place. While the Army Corps of Engineers (ACOE) is known to be a premier engineering group, some of its conclusions and predicted outcomes from dam removal present vastly different numbers regarding sedimentation when compared to the engineering study by Stantec in 2010. What if the outcomes ACOE predicts are wrong? It is certainly possible. What protections or guarantees is ACOE willing to give to the marinas, the group with the most to lose? During the last six weeks, the marinas have been told, late in the permitting process, that the Corps is now interpreting their regulations differently, requiring the marinas to spend more time and money to receive required permits to send dredge spoils to a federal ocean dump site. Again, this change is due to ACOE’s changed interpretation of its regulations. How can we trust this process, given these concerns? Rather than spending millions on dam removal, these funds could be more effectively allocated to address pressing local needs, such as infrastructure improvements. Additionally, the town's potential liability for any environmental damage resulting from the dam removal raises significant concerns. While the Maine Tort Claims Act grants broad and sweeping immunities to municipalities, it contains an important exception: a town is not immune from suit by a property owner if the town causes a sudden and accidental release of pollution on the person’s property. We urge ACOE to carefully consider these factors and conduct a comprehensive costbenefit analysis before proceeding with the project. The unpredictability of decisions, as demonstrated by the recent changes in permit interpretations, are very concerning to us. A more thorough evaluation is necessary to ensure that the potential benefits outweigh the risks and that the project aligns with the long-term interests of the community and the environment.
99	11/15/2024	Linc Merrill		North Yarmouth	Our family opposes the removal of the dams which impound water from Yarmouth and then for several miles into the Town of North Yarmouth. Since the 1960s, our family has canoed the river and enjoyed the wildlife that lives along the watershed. I have participated in community sponsored races down the river as have numerous other residents. Our family fishes in the river which

#	Date	Commenter	Org.	Location	Message
					the State of Maine also stocks, and walks along the banks. Others harvest and enjoy the fiddleheads that grow along the banks. People swim in the river in North Yarmouth and so do their dogs. They use small motorized velles, too. In the late 1800's, a summer hotel in North Yarmouth received guests at their boat landing on the river. The Steamer Hoyt came up the Royal River from Yarmouth with these guests aboard. Many Yarmouth residents had camps on the river and would often leave work and canoe or motor up river from what is now the Elm Street dam area. Small boats were left at strategic places on the river so anyone could borrow them to fish. Eel fishing was popular, too. This river is the only true recreation feature in the Town of North Yarmouth. We have no shore frontage, no lakes, no State Parks, or ski resorts. Articles are constantly being written that extol the wonders of canoeing on the Royal River in North Yarmouth and indicate how to find the 2 town controlled launching places. This is our only resource while Yarmouth has many. When I served on the Future Land Committee for North Yarmouth, we chose Royal River access as our number one priority for land acquisition. We were successful in achieving that goal. The Town invested a lot of money in that effort. The access to a navigable waterbody is so important that the Parks Committee did a lot of work to prepare to build a launch site for handicapped individuals to enjoy the river. Now, the Town of Yarmouth proposes to drop the water level so severely in North Yarmouth that the river will become shallow enough to require portages. The handicapped launch site has to be abandoned. The dry hydrant that the Fire Department uses at the Route 9 bridge to obtain water from the river may not be able to provide water to fill a fire truck in the event of a fire. The water depth in the river will drop and that will warm the remaining water so that the marine life will be negatively impacted. Fishing will not be the same. In fact, it appears that without blasting out ledge in Yarmouth, fish can't make it up into the newly created mudflats anyway. That is certainly not the natural river I hear talked about. Finally, I don't believe that the Town of Yarmouth can make decisions about the Royal River without the agreement of North Yarmouth residents. The 1849 Legislation that allowed Yarmouth to separate from North Yarmouth kept all North Yarmouth's rights to the ocean, flats, fisheries, etc. in place. Later court decisions confirmed those rights of North Yarmouth residents and said that if the Legislature had intended anything else, they would have said so in the law. I believe it is improper for Yarmouth to proceed on its own, and based on some initial legal reviews, probably illegal for the Town of Yarmouth to do otherwise. I urge you to keep the dams in place and respect the rights of North Yarmouth residents.

#	Date	Commenter	Org.	Location	Message
100	11/15/2024	Charlene D'Avanzo			I am a marine ecologist and long time Yarmouth resident. I strongly support the USACE plan because dam removal will restore the Royal River to its natural state. This in turn will positively impact the ocean ecosystem the Royal flows into.
101	11/15/2024	Ben Ford	(Archipelago)	Yarmouth	Thank you for the opportunity to comment the above report. I am a resident of Yarmouth, Maine. I live at 267 West Elm Street, about ½ mile from the Elm Street dam. I am also a boater and regularly use this river estuary for navigation. I write out of deep concern for the lack of information contained in this report on the potential impacts this proposal would have on those who rely on the Royal River estuary for their livelihood. Pursuant to Section 206 of the Water Resources Development Act (33 U.S.C. § 2330), the Secretary may carry out a project to restore and protect an aquatic ecosystem if the Secretary determines that the project "will improve the quality of the environment and is in the public interest." The draft "Integrated Detailed Project Report & Environmental Assessment" dated October 2024 lacks discussion of several risk factors and therefore fails to give the Secretary grounds for such a finding. Any plan approval based upon this draft report would therefore be an arbitrary and capricious act by the Secretary. To remedy this, the Army Corps of Engineers must revise the plan to more thoroughly consider the risks posed to the down-stream infrastructure owned and maintained by the Town of Yarmouth, private individuals, and businesses. To begin with, the report fails to consider the amount of sediment that could be washed down river from eroding river banks. The report estimated the amount of sediment by measuring the sediments in locations within the impoundments, most of which were at the bottom. The report concluded that because there was little sediment in these areas, there will be minimal impacts on the need for increased dredging in the estuary. Even with only considering the sediments in the impoundments, the report estimates the removal will generate 5,400 cubic yards of sediment, about the same amount as what the marinas remove during a maintenance dredge. The report never considered the additional sediment that would be generated through erosion while the river bank re-establishes itself over the years. With an approximately five-mile-long impoundment, the amount of sediment that could be washed down as a result of this erosion could be orders of magnitude greater than what is estimated in this report. The Corps has the responsibility to dredge the Federal Navigation Servitude, but the sediment that accumulates in other parts of the estuary must be removed by private parties, including the marinas situated directly downstream. The probability of the increased frequency of dredging and the financial impact of that extra dredging is a significant factor informing the Secretary of the "public interest" component of Section 206. Any approval without these considerations would be an arbitrary and capricious act. Discussions of these risk and mitigation plans therefore must be included in the report and the proposed plan to remove the dams. Next, the report too readily dismisses the concerns over heavy metals and only speculates as to the divergent results between the 2013 Stantec Study and the 2023 Army Corps study. Admittedly, this is a low probably scenario, but to the extent any contaminated sediment settles below the docks of the marinas, it could push the sediment chemistry above the maximum limit for disposal at the Portland Disposal Site and could force the marinas to dewater and truck the sediment for upland disposal, if they can move it at all. The increased cost of dredging could force several businesses that rely on the river, including the marinas, into bankruptcy. Such an outcome, even though it is low risk, should have been considered in this plan and the Corps must propose a mitigation plan the would protect the businesses and homeowners against this loss.

#	Date	Commenter	Org.	Location	Message
					Finally, the proposal fails to address the increased risks of damage to private and town-owned infrastructure caused by the increased water velocity where the river empties into the estuary. Figure 28 shows an increase in the mean water flow velocity where the river meets the estuary, exactly where one marina has its docks. Logic dictates this increase would be compounded during storms such as the storms that heavily damaged the docks at Yarmouth Boatyard. The report must be edited to include consideration of these risks and a plan to mitigate these risks must be proposed and considered in order for this proposal to be complete. Hundreds of people rely on this river and its estuary for their income. The Town of Yarmouth has a rich shipbuilding and commercial fishing tradition that dates back centuries. The businesses currently operating on the river are among the few properties in a rapidly shrinking commercial tax base for the Town of Yarmouth. As drafted, this report glosses over previous data indicating risk, jumps across missing data to make unsupported conclusions, and ignores data that is printed right on the page. Any consideration of the public interest must consider the impact of this project on the businesses that rely on this river and on the families of the people they employ.
102	11/15/2024	Andy Smith-Petersen		Yarmouth	Thank you for your work on the Royal River study. With regard to the TSP, I support the removal of the dam at Bridge St and partial removal of the dam at East Elm. With regard to modifying Middle Falls, I do not support any action other than removing man-made artifacts. In particular, I do not support the introduction of new features (such as boulders) into the main channel in order to divert flow to the side channel. I would prefer to see the channels left in as natural a state as possible, with possible re-evaluation several years after dam removal, after the ecosystem has had a chance to adjust to new conditions.
103	11/15/2024	Francesca Gundrum	Maine Audubon		Thank you for the opportunity to provide comments on the U.S. Army Corps of Engineers' *Royal River, Yarmouth, Maine Section 206, Aquatic Ecosystem Restoration Draft Integrated Detailed Project Report and Environmental Assessment* dated October 2024 on behalf of Maine Audubon and our 30,000 members, supporters, and volunteers. Maine Audubon is a wildlife conservation non-profit – we fulfill our mission to "conserve Maine's wildlife and wildlife habitat" by engaging people of all ages in nature through a science-based approach to education, conservation, and advocacy. Maine Audubon supports the adoption of the tentatively selected plan to a) partially remove the East Elm Street dam and fully remove the fish ladder; b) fully remove the Bridge Street dam and fish ladder; and c) construct a diversion at Middle Falls. These unused dams create barriers to fish and other aquatic organism movement, disrupt natural river functions, and alter fish and wildlife habitat. Maine is home to numerous species of sea-run fish that spend part of their lives in the ocean, and part of their lives in freshwater. These species need to move freely between habitats at specific times in their life cycles in order to survive. Species like alewives, blueback herring, Atlantic salmon, and eels need access between the ocean and freshwater rivers and streams in interior Maine to spawn and raise future generations. Dams with insufficient fish passage—like these dams and associated infrastructure along the Royal River—largely prevent many of these species from making those movements. Dams also change sections of free-flowing rivers and streams with cool well-oxygenated water into impoundments of warm reservoirs of low-oxygen water. Cold-water fish

#	Date	Commenter	Org.	Location	Message
					species such as brook trout and Atlantic salmon avoid these warm, still waters and their populations become limited to where cool running water is available. Removing these dams will reestablish a more structurally complex and dynamic riverine system with riffles, pools, and dead woody material – all of which provide the feeding, nesting, and resting areas needed by fish and the aquatic insects they feed on – and have positive benefits for many species of wildlife as well, such as mink, otters, kingfishers, osprey, great blue herons, and bald eagles that can feed on the abundant fish. These changes have been well documented after removal of dams on both the Kennebec and Penobscot Rivers in Maine.[1] Removing dams can also provide economic benefits: alewives are valuable baitfish for the $464 million lobster industry, brook trout bring recreational tourists to Maine, and the eel fishery in Maine is worth approximately $19 million annually.[2] Fish and wildlife, as well as free-flowing rivers and associated habitats, are held in the public trust by various levels of government. That compact with the public requires harm to fish and wildlife and their habitats to be offset by benefits to the public. Given these dams and associated infrastructure are not operational, the harm must stop and fish and wildlife habitats must be restored. To help restore the riverine system, we support the U.S. Army Corps of Engineers' tentatively selected plan and respectfully urge Yarmouth leadership and residents to support its adoption and implementation. [1] DeSorbo, C. R., D. Riordan, and E. Call. 2015. Maine's Sebasticook River: A Rare and Critical Resource for Bald Eagles in the Northeast. Biodiversity Research Institute, Portland, Maine, and Maine Department of Inland Fisheries & Wildlife, Bangor, Maine. 6 pp. Accessible at https://www.maine.gov/ifw/docs/Sebasticook%20Eagle%20Flyer%2092115.pdf [2] MDOT. News, Maine 2023 Commercial Fisheries Value Increases by More than $25 Million. Accessible at https://www.maine.gov/dmr/news/fri-03012024-1200-maine-2023-commercial-fisheries-value-increases-more-25-million
104	11/15/2024	Deb Delp	Yankee Marina & Boatyard	Yarmouth	In addition to the comments I signed with my fellow boatyard owners, I need to share a concern not shared with the group. During our meeting at Patriot Insurance, one of your USACE representatives misinformed the those in attendance regarding the DMR study. He answered a question about fish passage quoting the DMR study saying that it was due to the fish ladders. When I spoke next, I corrected him and asked him to confirm that it was the middle falls that prevented the fish from ascending the river, which he confirmed. We are relying on the USACE for valid information, and I must question what other information may have been misinterpreted. Secondly, I also feel strongly that before we risk anything, the residents should know for sure whether fish can make it up the river with the structural alterations to the middle falls. Which I must point out, is not restoration at all, but changing the river in hopes that fish will go up the river. Lastly, it was confirmed in the meeting at the Patriot Building that the marinas will not experience any additional sedimentation. If we do, what will the Corps do about that?

#	Date	Commenter	Org.	Location	Message
105	11/15/2024	Morrill Nason, Jr.		Formerly of Yarmouth	Hello, my name is Morrill Nason. I am a semi-retired whitewater boater, class 3-4. I grew up in Yarmouth in the years 1947 to 1968 and 1972 to 1990. Growing up 1/2 mile from the Royal on North Elm St, the river became my playground, fishing and exploring all the old Forest Paper mill remains. I was intrigued by all the stone work that encompassed the dam and retaining walls, wondering what it must have been like before and during the heyday of all the mills operating. I was elated when I first became aware of the possibility that the dams could be removed. With the Stantec ? studies, I started visualizing the routes thru the old E Elm St dam. I could see a use for the old granite blocks besides the primary source for stabilizing the bank of the residential home. Why not utilize them in the left channel of Gooch Island to form barriers for whitewater features as found in whitewater parks. The area could become a park and play right next to Yadmouth's recreation facilities. Thank you for all the work. I hope this comes to fruition soon so that I may get at least one run in before my time expires.
106	11/15/2024	Tom Reinsborough	(Abutter)	Yarmouth	My name is Tom Reinsborough. My property, 44 East Elm Street, abuts the river at the first bend in the river before the upper falls. I may own some of the foundation of the Yarmouth Ice House. Thirty +/- years ago, I did a land exchange to establish a fixed boundary line. I am very excited at the thought of the removal of the dams in the Royal River. I have fished extensively in the Kennebec and the Presumpscot Rivers since their dam removals. I have a sense of what the Royal will become, a free flowing and wonderful place to fish. I have listened to a lot of the public comments and people's concerns about the removal of the dams and I think it would be a good idea for these people to go see these other rivers and how they have rebounded after their dams were removed. It's difficult to get a parking spot on Middle Rd in Falmouth because it is so popular, but it would be worth the trip. I have lived in Yarmouth almost all of my life. I remember playing down by the factories and watching the chicken parts and blood flow down the river, as well as the sewer from the town. Now sixty years later, it thrills me to see how well the river has recovered from Bridge St down. My hope is that the upper portion of the river will have the chance to recover as well. I did hear some comments regarding the diversion structure at Middle Falls to push the water around Factory Island. I think that this would be a very cost effective idea to restore an area that was severely altered when the paper mill was installed. This way, the fish could easily swim up stream around Factory Island rather than having to install a fish ladder which would not work as well. I fully support the wilding of the Royal River by removing both dams.
107	11/15/2024	Steve Ryan	Yarmouth Tree		The Yarmouth Tree Advisory Committee has reviewed the USACE draft plan regarding potential dam removal in Yarmouth, Maine. Removing the two dams in Yarmouth will expose riverbanks that haven't been exposed in over a century on private and public lands.

#	Date	Commenter	Org.	Location	Message
			Advisory Committee		The draft plan calls for spraying of a seed mixture. It doesn't specify if that will occur on private lands or just public. We noticed the absence of any plan to plant trees along the riverbanks. Trees are not only beneficial for stabilizing river banks and preventing erosion but also provide a home to wildlife. We suggest the plan be modified to include planting a substantial number of native trees and bushes along the newly exposed riverbanks between Bridge St and Route 9 along the Royal River.
108	11/15/2024	Robert C McKinnon			I am a trip leader with Appalachian Mountain Club and a member and paddler with Penobscot Paddle and Chowder Society. I am a frequent user of rivers in Maine and New England in general, as well as other areas of the east coast. I have been following the results of fish passage restoration's and removal of old and defunct dams throughout the country. Usually the removal of the dams and returning the river to as reasonably close to its original condition before the dams is best for fish passage, flood control, navigability, and cost. There are many dams that were built long ago, near the coast that restrict fish migration and have had a negative impact on overall fish populations. Please consider removing the dams and restoration of the riverbed as much as reasonably possible.
109	11/15/2024	Colles Stowell	(One Fish Foundation)	Yarmouth	My wife, daughter and I live on Baker St. in Yarmouth. We frequently take walks along the river in the park and sometimes go running there. A few years ago, on my daughter's birthday in May, we witnessed the stocking of several brook trout in the river. It was a wonder to my young daughter. I'm also an educator, bringing the sustainable seafood message to classrooms from elementary to graduate students. One key focus is on habitat restoration and protection to ensure healthy habitat for a variety of species from fish to sea birds, otters, minks, beavers, etc. Removing the dams would be another proof point of how the state and the federal government are working to restore historic fish runs that are keystones to healthy watersheds. I'm also an avid flyfisherman, and I would love to see a rebalancing of fish runs from alewives, to sea run brookies and browns to striped bass. So I support the dam removal as proposed in the current plan, provided the process is guided by the science and constant monitoring to ensure the transformation yields little negative ecological impact.
110	11/15/2024	Kristin Carden		Yarmouth	I am a resident of Yarmouth, Maine, and write in support of the tentatively selected plan for aquatic ecosystem restoration of the Royal River (i.e., Alternative 2, U.S. Army Corps of Engineers (USACE) Draft Integrated Detailed Project Report & Environmental Assessment, Royal River, Yarmouth, Maine, Section 206, Aquatic Ecosystem Restoration, CEQ ID - EAXX-202-00-E6P-172863450 (Oct. 2024)). As a conservation ecologist, my comments focus primarily on the ecological benefits of dam removal. At present, the Royal River ecosystem exists in a degraded condition. Neither the Bridge Street Dam nor the East Elm Street Dam has a functioning fish ladder, which inhibits fish passage. Dam removal would restore streamflow and river habitat, promote fish migration and recovery, and improve access to spawning and nursery habitat for native fish species including alewife. It also would allow for reestablishment of natural riparian habitat. A healthier river ecosystem would benefit other wildlife species as well, including a

#	Date	Commenter	Org.	Location	Message
					variety of bird species (e.g., bald eagles) and mammals (e.g., raccoons) (see USACE Draft Integrated Detailed Project Report & Environmental Assessment, Table 21, pp.119-120). It would provide economic and social benefits to the community through enhanced fishing, wildlife watching, and recreational opportunities. Dam removal efforts nationwide are demonstrating the profound ecological, economic, and social benefits of dam removal, particularly in the face of ongoing climate change. I support dam removal as described in Alternative 2 of the USACE's Draft Integrated Detailed Project Report & Environmental Assessment.
111	11/15/2024	Peter Hubbard		Yarmouth	Please consider the following comments regarding the Section 206 Study for the Royal River in Yarmouth Maine. 1) I am in favor of removing both dams and restoring natural flow, riverine habitat and fish passage. To allow for aquatic passage, modification of middle falls is reasonable if historic aquatic passage allowed for anadromous fish passage further upstream. 2) The dam removals should be complete. The Elm Street dam should be completely removed and riverine habitat restored, as close to its natural flow path as possible. 3) The Royal River is a whitewater paddling destination. It is a class III - IV listed river section in major paddling publications (see: American Whitewater link https://www.americanwhitewater.org/content/River/view/river-detail/883/main). All four major rapids are currently navigable and are run by competent paddlers. One exception for common navigation is the Bridge Street dam itself, which is not often run due to the "landing" zone being 'hard. A portage around the dam allows for the vast remainder of the rapid to be run. The Royal River is a "gem" for whitewater paddlers looking for a place to paddle in southern Maine and an attractive location to paddle. Dam removals will only increase the Royal River as a destination for whitewater paddlers. 4) Noting the comments above (#3) regarding whitewater paddling, it is imperative that work on the river accommodate padding on every rapid throughout the entire reach affected by the proposed modifications. Modifications need to be safe, as the entire river section WILL be navigated by the whitewater paddling community, including middle falls. There is concern that modification of the flow regime could adversly impact navigation. Rebar and jagged rocks should not be introduced. ANY identified rebar or other unnatural hazard to navigation should be removed. It is important to note that whitewater paddlers swim rapids inadvertently and end up navigating the river as a swimmer. Rebar, jagged rock or other material that could impale or severely injure a swimmer should be omitted from any modification in ALL locations. Please see the two YouTube videos (links below) demonstrating whitewater paddling of all four of the major rapids on the Royal River. https://youtu.be/kL11FTXuCmg https://www.youtube.com/watch?v=HTDzqTb8zSQ The section of river from the Elm Street dam down to head of tide is currently navigated routinely. Navigational safety must be a

#	Date	Commenter	Org.	Location	Message
					priority when any riverbed manipulation is conducted. I anticipate that the whitewater section of the Royal River from Elm Street to the head of tide will be paddled more frequently as the features in the riverbed may improve for paddlers after dam removal takes place.
112	11/16/2024	Bruce Drouin	(Royal River Alliance)	Yarmouth	As a Yarmouth resident of 32 years I have walked and paddled along many stretches of the Royal River many times both above and below the dams, frequently as a trip leader of the boys in our local Scout Troop 35. Paddling in the river's six-mile-long impoundment waters above the East Elm Street Dam had and has elements of serenity and beauty but also elements of disappointment and lost potential in its current dammed up form. Except after large storms, the impoundment waters there are mostly stagnant. The river there exhibits some, but not abundant evidence of fish and wildlife activity and diversity. It made me wonder why the obsolete Bridge Street and East Elm Street Dams, the two major impediments to improved river water quality and sea-run fish migration and spawning within the river's 140 square mile watershed, were being allowed by their owner, the Town of Yarmouth, to remain in place. The Royal, after all, is the heart and soul of Yarmouth, the reason Yarmouth came to exist and thrive economically for colonial settlers 350 years ago. For untold years prior to colonial settlement, it was a well-travelled pathway, trade route and major source of sustenance for the area's indigenous peoples. Robust migratory fish populations in the Royal River were noted, documented, harvested and even legislatively protected by immigrants turned citizens as early as the 1670's and well into the 1800's when the industrial age became paramount and 8 or more dams were installed to harness power from the cascading waters of the lower river. For over 100 years, well into the 20th century, those dams played an important economic role in the local and state economy but the benefits came at a major ecological price, the ending of upriver and downriver anadromous fish migration and a degradation of both the entire river watershed's ecological health and that of Casco Bay into which the river flows. The Royal constitutes the 2nd largest freshwater watershed emptying into Casco Bay. I have heard it has the 6th best potential for supporting a migratory alewife population in the whole Gulf of Maine. The dams are down to two, the industries they once supported long gone. The last potential for a commercial purpose was removed several years ago when the owners of the Sparhawk Mill below the Bridge Street Dam gained approval from FERC to give up their rights to generate hydropower, finding their three small turbine generators installed I believe in the early1980's too costly to maintain, operate and replace relative to the power they generated. In 2024, the Royal continues to have important regional ecological importance despite hindrance from its obsolete dams, and as the TSP found, it has the potential for so much more through dam removal/partial removal! Along the estuary, river-driven economic activity continues in the form of marinas, restaurants, fishing, lobstering and aquaculture. The USACE's recent studies and modeling have shown these small business enterprises stand virtually no risk of endangerment from the removal/partial removal of the remaining dams. No worrisome concentrations of pollution were found in the sediments behind either dam and in fact there was relatively little impoundment sediment found built up and likely to migrate and stay in the estuary as well, meaning minimal increases in dredging requirements for the marinas and navigation channel. My long-held concerns for the blocking of natural fish migration and for the health particularly of the impounded waters of the Royal led me to join others about 5 years ago in the founding of the Royal River Alliance, a non-profit group interested in and eager to advocate for the restoration of the Royal River watershed's health through the return of the river to free flowing status. I am a member, director and the treasurer for the group. The Alliance is about 60 members strong and has a diverse membership, including marine biologists, ecologists, engineers with wastewater treatment and dam removal and river restoration

#	Date	Commenter	Org.	Location	Message
					experience, lawyers with environmental law and regulatory law experience, a state legislator and others like me who are just outdoors sportsmen and conservation enthusiasts (I also happen to be a retired banker). Over the past five-plus years the RRA has acted as a research, education and advocacy group for restoration of the natural ecology and health of the Royal River. --We successfully supported, with recommended conditions, FERC's granting of Sparhawk Mill's petition for abandonment of its power generating rights, which ended the last potential commercial use argument for retaining the Bridge Street Dam. --We have gathered, studied and publicly posted and continue to post on our royalriveralliance.org website all the Royal River-related documents and studies we have obtained. We have posted scientific information about the life cycles and habitat needs of native migratory fish species. We have gone on site visits to other river restoration projects completed and in progress in Maine—some involving fish ladder construction, dam removals or combinations of both. We have educated ourselves about dam removal project regulatory requirements and about the process of bringing constituencies together in developing and supporting a river restoration project plan --We have collected and posted studies, results and stories of other river restoration and migratory fish passage projects. --We have met with our Town Councilors past and present about the river restoration study findings pre-dating USACE involvement and successfully lobbied for Town participation with the USACE in the Section 206 Program up through the current Tentatively Selected Plan phase of the Town/USACE collaboration. With RRA support, two former RRA directors currently serve on Town Council as does a former member at large. A lawyer formerly on the RRA Board has assisted in holding the USACE to the project scope, progress reporting, collaboration, deliverables delivery and other project standards set forth in the project contract negotiated and executed between Yarmouth and the USACE. --As part of our public outreach, we have conducted public river walks between the two dams, put a float in the Yarmouth Clam Festival Parade, organized Yarmouth's celebration of the biannual World Fish Migration Day, hosted public talks by marine biology and river restoration experts, maintained a website, published a quarterly newsletter, compiled and publicly distributed a river restoration FAQ brochure and handout enumerating the benefits to the Royal River of the dam removals proposed in the USACE's Tentatively Selected Plan. --We have collaborated with our sister Yarmouth 501c(3) conservancy organization, the Royal River Conservation Trust, on establishing and initially funding under its control a Royal River Restoration Fund as a potential vehicle for seeking grants and private donations facilitating approval and implementation of any river restoration plan ultimately focused on by the Town of Yarmouth. We have kept other sister conservancy organizations, including Friends of Casco Bay, Trout Unlimited, American Salmon Federation, the Nature Conservancy, Maine Rivers, American Rivers, the Patagonia Foundation, Presumpscot Regional Land Trust, Casco Bay Estuary Partnership and Maine Coast Heritage Trust, informed of Yarmouth's progress towards a river restoration plan and the potential need for support in gaining project approval and in project implementation fundraising. --We obtained training, equipment and approval from the Maine DEP to conduct a Spring-Fall scientific study of the water

#	Date	Commenter	Org.	Location	Message
					temperatures and dissolved oxygen levels found at various depths and in various locations along the impounded stretch of the Royal River above the East Elm Street Dam. The Royal is state-rated as a moderately healthy, Class B waterway. Our findings were that in the relatively stagnant East Elm impoundment, particularly during summer months, the Royal frequently failed to maintain the dissolved oxygen levels necessary to maintain Class B water quality status. The DO levels were frequently marginal for sustaining healthy sea run fish populations, for supporting their migration to upriver spawning grounds. The scientific data collected supports a determination that the entire river needs to be free flowing to best meet Class B water quality standards and to best support successful native sea run fish migration to the upriver watershed spawning grounds. The data collected has been shared with and accepted by the Maine DEP and Maine Department of Marine Resources. --We at different times of the year collected water samples in locations below, between and above the Yarmouth dams and sent them to a laboratory specializing in the identification of fish species by the DNA found in the samples. DNA evidence of the presence of native anadromous fish species (excepting Atlantic Salmon) was found in the sample of estuary waters below the Bridge Street Dam while no DNA evidence of migratory fish species (other than Brook Trout, capable of staying just in fresh water) was found in the waters above East Elm Street Dam. Conclusion: The two dams in place on the Royal in Yarmouth are very effective barriers to the upriver migration of our native sea run fish species. We have done all that we could think of to promote Town collaboration with the USACE on making a plan for the restoration of a free flowing, healthy Royal River. I personally and the RRA as an organization stand ready to help more with fundraising and with the garnering of further local support for the USACE and the Town to take the next steps towards actual dam removal/partial removal. Thank you for the time and effort all the USACE project team members have put into bring the restoration project's TSP forward to this point, and I thank you all in advance for your continuing efforts to help the Town of Yarmouth as well as the other communities within the Royal River watershed regain and enjoy the full potential our priceless Royal River resource.
113	11/16/2024	Laurel Ladd		Yarmouth	I would like to write for my support of the removal of the dams along the Royal River. I am in support of the USACE plan. I fee that it is time to restore the river to the way it needs to be. I imagine it will take some time for the ecosystem to return. I would like to see the fish and the natural habits come back for the health of the river.
114	11/17/2024	Paul Hodgetts		North Yarmouth	Sorry I missed the dead line. I am opposed of the Elm st. dam being removed. My name is Paul Hodgetts former Select Board member of North Yarmouth (term ended 6/30/24). There are to many unknown issues. One is the water level and the effect on dry hydrants, it would effect more than 4 houses that was stated in the letter from the North Yarmouth Select Board. Other issues are wells, recreational use, lower water level could mean that pools could have lose of oxygen, fish would die or stop using those pools. I feel it's a bad idea and not enough study has gone into how it would effect North Yarmouth.
115	11/17/2024	Wilder Martelle		Yarmouth	I am a student at YHS and I strongly believe and support the removal of the dams.
116	11/4/2024	Michael Brandimarte	Royal River Fish Passage	Yarmouth	I am writing as a resident of Yarmouth and a co-founder of Royal River Fish Passage to offer comments on the recent Royal River USACE 206 study and the Tentative Selected Plan, which proposes removing both the Bridge and Elm Street dams as well as altering Middle Falls to improve fish passage. I believe these actions are essential steps toward improving fish passage into the upper Royal River habitat and restoring the river’s ecological function. Royal River Fish Passage was founded with the goal of restoring and operating the existing Denil fish ladders on both dams to

#	Date	Commenter	Org.	Location	Message
					provide diadromous fish and other migratory aquatic species with at least some passage to additional upstream spawning habitat. While these structures are not ideal in comparison to modern fish passage solutions or a barrier free river, they do offer a short-term, partial solution while the town considers long-term actions for the river. We have observed some passage among river herring, trout, and suckers, highlighting the potential for improved ecological outcomes if fish improvement actions take place. Personally, I am supportive of the Tentative Selected Plan's proposal to remove both dams and make alterations to Middle Falls that would enhance fish passage. I encourage the town to act decisively in removing these barriers and to consider its responsibility to protect and enhance our riverine ecosystem. The potential for a positive impact on biodiversity, particularly for species reliant on upstream habitats, cannot be overstated. As part of this project, I strongly recommend that a comprehensive post-project ecological monitoring plan be included to provide data on the long-term environmental improvements achieved as wildlife reclaims its natural habitat. I would also like to respectfully request that the town supports the Royal River Fish Passage initiative as an interim measure. This temporary solution helps address fish passage needs until a permanent resolution can be implemented and highlights the ecological recovery opportunity that fish passage improvements represent. Finally, I extend my gratitude to the USACE team for their extensive research and analysis, which has provided invaluable insights to inform the town's decision-making process. I am optimistic the town and the community recognize this opportunity to restore our river and will take action for the benefit of future generations.
117	11/18/2024	Gweneth Zimmerman		Yarmouth	I am a student at YHS and I strongly support the removal of the dams.