October 1, 2008

Mr. Ernest Hilton, Chair
Maine Board of Environmental Protection
State House Station 17
Augusta, ME 04333

RE: Reclassification of the Androscoggin River Pursuant to 38 MRSA, Sections 464 and 465

Dear Mr. Hilton:

I am writing on behalf of the Lewiston City Council. At a recent meeting, the City was asked to support the reclassification of the Androscoggin River from the Durham boat launch or Worumbo Dam to its mouth at Merrymeeting Bay, from Class C to Class B, as set forth in the petition of the Friends of Merrymeeting Bay (FOMB).

As we understand it, reclassification will result in the maintenance of Class B standards, which FOMB data clearly show are presently being met in this section of the river. Reclassification will provide the river with increased protection against degradation in the future, which will enable its condition to continue to improve.

The taxpayers of the City of Lewiston have invested millions of dollars into the effort to clean up the river. These investments have occurred at a time when every dollar paid by the public is increasingly difficult to part with. Those investments have come through the City’s aggressive combined sewer overflow (CSO) program and the sewer user fees going directly to our jointly owned wastewater treatment plant. Not only does the City of Lewiston value the river and understand the potential benefit of this request, we have demonstrated our financial commitment to the same.

We further understand that classification upgrades are appropriate where it is socially or ecologically desirable to attain higher standards and when the technological and financial capacity exists to achieve those higher standards within a reasonable time. Given that the river already meets Class B standards and because there is also clear social and ecological benefit from a cleaner river, the requested classification appears to be appropriate. The experience of other communities around the nation has shown time and again the tremendous potential for social, recreational, environmental, and economic benefit from river restorations.

It is further our understanding that such an upgrade request, given the current conditions that have been measured, would not require any additional financial impact, now or in the future, on the citizens of our community. If that assumption is correct, I, therefore, on behalf of the Lewiston City Council, encourage the Board of Environmental Protection to approve the reclassification of the Androscoggin River below Lewiston/Auburn to Class B.

Sincerely,

James A. Bennett
City Administrator

cc: Lewiston Mayor & City Council

file: AndroRiverReclassification