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Maine Chapter

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James R. Beyer
Regional Licensing and Compliance Manager
Bureau of Land Resources
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333
via email (NECEC.DEP@maine.gov)

January 18, 2021

Re: CMP's Minor Revision Application: Order #L-27625-26-A-N/L-27625-TB-B-N/L-276252C-C-N/L-27625-VP-D-N/L-27625-IW-E-N; USACE Permit NAE-2017-01342

Dear Mr. Beyer,

I am writing to represent Sierra Club Maine, one of 64 Chapters of the Sierra Club nationwide. We represent the interests of 24,000 members and supporters in Maine and are among 4 million members and supporters nationwide. We submitted comments throughout the process of the NECEC application and permitting schedule.

We urge you to recognize that the above referenced revision application proposed by CMP is not a 'minor' revision. 700 pages of revision can hardly be considered a minor revision with a straight face. This proposed project is of statewide, in fact region wide, significance. Moving a section of the transmission line corridor triggers public purview by law. Once again CMP has ignored the requirement to provide alternatives analysis as required for any application even to be found complete.

Further, we want to urge you to recognize the lack of proper public notice and extend to the public proper participatory opportunity. Less than two weeks notice is inadequate by any standard, however given the size of the application the comment period should be further extended at least to the first of February.

Secondly, since it meets all four of the criteria pursuant to 06-96 C.M.R. ch. 2 § 17 Sierra Club Maine also requests that the Board of Environmental Protection assume jurisdiction over this application including a public hearing on it. The fact that this project is of statewide significance alone thrusts it before the Board, see 38 M.R.S. § 341(D)(2).

We respectfully request that DEP process the application not as a minor revision but as an application. And we request that the application be submitted under the jurisdiction of the Board of Environmental Protection due to its statewide significance. In any case we request further time for public comment as is our right at least until 02/01/21.

Respectfully submitted,

Becky Layton Bartovics
Chapter Volunteer Leadership Team



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