

**STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

and

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

IN THE MATTER OF:

CENTRAL MAINE POWER COMPANY)
25 Municipalities, 13 Townships/Plantations,)
7 Counties)

L-27625-26-A-N)
L-27625-TB-B-N)
L-27625-2C-C-N)
L-27625-VP-D-N)
L-27625-IW-E-N)

CENTRAL MAINE POWER COMPANY)
NEW ENGLAND CLEAN ENERGY CONNECT)
SITE LAW CERTIFICATION SLC-9)

) APPLICATION FOR SITE LOCATION OF
) DEVELOPMENT ACT PERMIT AND
) NATURAL RESOURCES PROTECTION
) ACT PERMIT FOR THE NEW ENGLAND
) CLEAN ENERGY CONNECT

**REBUTTAL TESTIMONY OF ELIZABETH CARUSO, TOWN OF CARATUNK OF
PRE-FILE TESTIMONY OF ROBERT MEYERS (GROUP 3), AND LARRY WARREN
AND JOSEPH CHRISTOPHER (GROUP 7)**

1 ***Robert Meyers, Maine Snowmobile Association (Group 3)***

2 Understandably, Mr. Meyers needs to stay politically correct with the large landowners of the
3 State. As he mentioned, “95% of the snowmobile trails are on privately owned land.” It is
4 obvious that his greatest need is land access, and therefore wants to support large landowners.
5 In item 4 (page 2), Mr. Meyers stated his opinion of the attitude of the Association’s membership
6 as being “indifferent or support, with little to no opposition” of the project in the new 53 miles of
7 corridor. From social media, the MSA snowmobile trade show in Augusta, and letters and calls
8 MSA has received regarding this Project, his stated opinion of the membership’s attitude is not
9 truthful. Business and individual members have stated their disapproval. However still, MSA
10 never conducted a query of their membership. Neither were any studies conducted regarding the
11 impact this corridor would have on the snowmobile industry.

12 Mr. Meyer’s opinion of snowmobile trails under or near transmission lines is similar fantasy.
13 According to those who ride, groom and maintain the trails, snowmobile trails under
14 transmission lines are the first to melt and close due to the absence of the forest canopy and the
15 tundra-like-surface terrain (as opposed to an improved, dirt road). Transmission lines are not
16 trails of destination, but merely required trails to access the true destination area.

17 ***Larry Warren, WRMC (Group 7)***

18 In accordance with the Memorandum of Understanding, any signers of the MOU are required to
19 support the project in all agency proceedings. Accordingly, Mr. Warren’s testimony should be
20 read in that context. He states as follows on pages 3-4 of his pre-filed direct testimony:

21 Other areas of the Project that comprise new corridors have also been designed
22 in a manner that should help ensure that the Project will not unreasonably interfere with
23 existing scenic, aesthetic, recreational or navigational uses. A review of the information
24 provided by CMP as part of the Company's September 4, 2018 Response ("September 4,
25 2018 Response") to the Information Request by DEP/LUPC provides substantial

1 evidence that recreational areas and other natural resources that coincide with hiking and
2 snowmobile trails (e.g., No. 5 Mountain, Mosquito Mountain, and the Appalachian Trail,
3 Coburn Mountain, etc.) will not be adversely impacted by the Project. As noted by CMP,
4 “snowmobilers are accustomed to seeing transmission corridors and traveling within the
5 cleared corridors, so it is unlikely that the Project would have an impact on their
6 continued enjoyment of snowmobile trails.”
7

8 It may be common for snowmobilers to see transmission lines in some areas, however, this area
9 has 1) NO industrial infrastructure and 2) is one of the most highly targeted destination locations
10 in all of Maine. Coburn is not just any mountain. It is the highest groomed snowmobile trail in all
11 of New England. Visitors ride from all over Maine to summit Coburn for the 360-degree view of
12 unfragmented nature. There is no comparison, and Mr. Warren grossly misinterprets this area
13 because he is directly benefiting from the \$5-10 million through Maine Huts and Trails. He is
14 wrong when he states the following on page 4 of his pre-file testimony:

15 "The VIA accurately demonstrates the areas that will be impacted by the Project and the
16 significance of these impacts upon viewers. Photo simulations provided by CMP as part
17 of Appendix D of its September 2017 application also show that the visual impact of the
18 Project will be minimal and should not have an adverse impact on existing scenic,
19 aesthetic, and recreational uses of natural resources adjacent to the NECEC. "

20 ***Joe Christopher, WRMC (Group 7)***

21 On page 4, paragraph 2, Mr. Christopher states: “The characterization by intervenors that these
22 areas are ‘pristine,’ ‘untouched,’ and ‘natural’ are misleading and simply not true.” Contrary to
23 that statement, these areas are in fact natural as they are void of any manmade structures and
24 certainly void of industrial towers, transmission lines, EMFs and mechanical sounds. Yes, these
25 lands have been cut for generations by good stewards of the land. Everyone knows (and Google
26 Earth reveals) that clear cuts grow back, paper companies replant, and in 20 years, the section is
27 green with regrowth showing a healthy forest with the same habitat. The Nature Conservancy
28 clearly illustrates this in their testimonies. Also shown is the devastating effects transmission

1 lines (with their inherent EMF and Corona) sterilize birds and desecrate necessary, contiguous
2 wildlife habitats.

3 Mr. Christopher goes on to state that “CMP has proposed the NECEC in a manner that seeks to
4 minimize adverse impacts of the project upon the experience of hikers, hunters, rafters, anglers
5 or other users of the wilderness whose activities may take them into the vicinity of the NECEC.”

6 This is simply not the truth. The adverse impacts include obtrusive invasion to the natural
7 skyline, 150’ swath through natural habitat, poisonous chemicals, inherent mechanical sounds,
8 cancerous electromagnetic frequencies and a destruction of the natural landscape, which
9 normally lures tourists living in industrialized settings to the natural landscape. The VIA posed
10 pictures of desolate areas, void of scenic attributes in an attempt to paint it unattractive and not
11 luring to recreationists. In fact, this corridor is a dramatic change of usage.

12 On Page 4, paragraph 3 of Mr. Christopher’s pre-file testimony, he states, “CMP has proposed
13 to site the line in a manner that seeks to avoid the impact on these areas and have proposed
14 buffers to help ensure that water bodies are protected.” Regarding Coburn/Johnson Mountain
15 snowmobiling and hunting area, the corridor would intersect the snowmobile trails system eight
16 (8) times, would reach highly visible elevations of 2,100’-2,800’, and cross important wetland
17 areas. Further in the paragraph, Mr. Christopher states “the project also proposes other buffers
18 that will allow for the movement of animals between important habitats and help shield adjacent
19 uses from unsightly developments...” This statement is overwhelmingly false as noted by The
20 Nature Conservancy testimonies and experts.

21 As Avangrid has proposed in other projects "for aesthetic purposes", and as is standard in the
22 industry, the only way to buffer and avoid scenic and environmental impact would be to bury

1 the line. The applicant could have chosen the Route 201 corridor or existing logging roads such
2 as the Spencer Road to bury the line and avoid these devastating impacts.

3 On page 5, paragraph 3, Mr. Christopher refers to recreational fees to these areas. Currently,
4 there is only a fee for **commercial** customers to use the Kennebec River. There is no fee for any
5 other users to access the Kennebec River. Additionally, there is an access fee for only
6 commercial rafting customers to cross certain paper company land on their way to the Dead
7 River. THERE ARE NO OTHER FEES FOR ANY OTHER RECREATIONAL USERS IN
8 ANY OTHER AREAS. This supposed benefit referred to is non-existent. There are currently no
9 fees for hunting, snowmobiling, fishing, hiking or even kayaking and private rafting. Thus there
10 is no compensation factor here.

11 The bulleted list on page 6 reveals the incentive for Mr. Warren's Maine Huts and Trails to have
12 the leases for the Flagstaff Hut and hut sites at Grand Falls, Chase Stream and Indian Pond and
13 trails under license agreement to Maine Huts and Trails. This is not mitigation for the State of
14 Maine, the Maine citizens, the Maine ratepayers, or the tourism public. This is only a business
15 deal for Mr. Warren. Here there is an exchange of public lands, public views, the welfare of our
16 environment, wildlife, brook trout fisheries for his business benefits and that of CMP and Hydro-
17 Quebec.

Date: 3/15/19

Respectfully submitted,

By: Elizabeth Caruso
Print Name: Elizabeth Caruso

STATE OF Maine

COUNTY OF Somerset

Personally appeared before me on the above- named Elizabeth Caruso, who being duly sworn, did testify that the foregoing testimony was true and correct to the best of his/her knowledge and belief.

Before me,

Susan J. [Signature] #5087#
Notary Public/ Attorney at Law
My Commission expires _____