

THE STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

APPLICATION FOR SITE LOCATION OF DEVELOPMENT ACT PERMIT
AND NATURAL RESOURCES PROTECTION ACT PERMIT
FOR THE NEW ENGLAND CLEAN ENERGY CONNECT
FROM QUÉBEC-MAINE BORDER TO LEWISTON
AND RELATED NETWORK UPGRADES

PRE-FILED DIRECT TESTIMONY OF

JUSTIN JAMES PRESIENDORFER

ON BEHALF OF INTERVENOR GROUPS 2 AND 10

FEBRUARY 28, 2019

1 **Q: Please state your name and business address.**

2 A: My name is Justin James Presiendorfer and I live at 27 Uhlman Drive in Thornton, New
3 Hampshire.

4 **Q: What is the name of your organization?**

5 I am an independent consultant.

6 **A: What is your current position?**

7 I am a private consultant on matters related to wildlands, recreation, and the
8 management thereof.

9 **Q: What are your qualifications?**

10 A: I serve as the chair of the board of directors for the Society for Wilderness Stewardship
11 which is the professional society for wilderness managers, researchers, and educators.
12 One of the primary programs that we operate places budding professionals alongside
13 federal agency staff as they develop programs to monitor wilderness character. I have
14 over 15 years of experience managing congressionally designated wilderness areas for
15 the USDA Forest Service including the Caribou-Speckled Mountain Wilderness,
16 Maine's only national forest wilderness. In addition to work in New England I have
17 served as a Forest Service program manager for the Eastern Region providing oversight
18 and guidance to 17 national forests across the US Forest Service's 20-state Eastern
19 Region. The three programs I managed were focused on those areas designated by
20 congress as Wilderness, Wild and Scenic Rivers, or National Scenic or Historic Trails.
21 For five years I served on the Chief's Wilderness Advisory Group, a portion of this time
22 as chair, and provided wilderness guidance directly to the head of the USDA Forest
23 Service.

24 **Q: Are you familiar with the project area?**

1 A: I am. My great, great, great, great grandfather Galon Newton moved to Moose River
2 with his brother Jacob in 1828. Family members eventually spread into the communities
3 from Dennistown to the Forks and my grandfather Linwood Moore was born in Moose
4 River in 1930. While I live in northern New Hampshire I make at least one trip per year
5 to visit the woods, ponds and rivers that my grandfather grew up in.

6 **Q: What is the purpose of your testimony?**

7 A: I am providing testimony related to the impacts of the NECEC project proposal on the
8 Scenic Character and Existing Uses of the project area as well as the analysis of the
9 project alternatives.

10 **Q: What have you considered to prepare this testimony?**

11 A: I considered the following:

12 The NECEC Project Application

13 Documents and information exchanged between PUC and the Applicant that were
14 publicly available;

15 The Applicant's response to the February 23, 2018 USACE Information Request

16 The Applicant's Natural Resources Protection Act Application dated September 27,
17 2017

18 Maine State Comprehensive Outdoor Recreation Plan 2014-2019

19 The Record of Decision for the Northern Pass Transmission Line Project

20 A variety of reports on the recreation economy and recreation trends including but not
21 limited to:

22 Outdoor Industry Association's consumer spending report "The Outdoor Recreation
23 Economy"

24 Outdoor Industry Association's (OIA) Maine State Report

25 Annual Reports from the Maine Office of Tourism

1 2017 Maine Office of Tourism Kennebec Valley Regional Report

2 USDA Forest Service's Future of America's Forest and Rangelands: Forest Service

3 2010 Resources Planning Act Assessment.

4 Bureau of Economic Analysis webpages focused on outdoor recreation found at

5 <https://www.bea.gov/data/special-topics/outdoor-recreation>

6 Outdoor Participation Report 2018. The Outdoor Foundation

7 A variety of research on people's preference for natural landscapes including but not
8 limited to:

9 Coeterier, J.F., 1996. Dominant attributes in the perception and evaluation of the Dutch
10 landscape. *Landscape and Urban Planning* 34, 27–44.

11 Hartig, T., 1993. Nature experience in transactional perspective. *Landscape and Urban*
12 *Planning* 25, 17–36.

13 Kaplan, R., Kaplan, S., 1989. *The Experience of Nature: A Psychological Perspective*.
14 Cambridge University Press, Cambridge, UK.

15 Ulrich, S.R., 1983. Aesthetic and affective response to natural environment. In: Altman,
16 I., Wohlwill, J.F. (Eds.), *Human Behavior and Environment: Advances in Theory and*
17 *Research. Behavior and the Natural Environment*, vol. 6. Plenum Press, New York, pp.
18 85–125.

19 Van den Berg, A.G., Vlek, C.A.J., Coeterier, J.F., 1998. Group difference in the
20 aesthetic evaluation of nature development plans: a multi-level approach. *Journal of*
21 *Environmental Psychology* 18, 141–157.

22 A variety of research papers on the health benefits of outdoor recreation and natural
23 landscapes such as but not limited to:

1 Vella, E.J. et al. "Participation in Outdoor Recreation Program Predicts Improved
2 Psychosocial Well-being Among Veterans with Post-traumatic Stress Disorder: a Pilot
3 Study." AMSUS Military Medicine, 2013.

4 Weinstein, Netta et al. "Seeing Community for the Trees: The Links Among Contact
5 with Natural Environments, Community Cohesion, and Crime" BioScience, 2015.
6 Green Cities: Good Health. University of Washington.

7 2005 White Mountain National Forest Land and Resource Management Plan

8 Robert Kenneth Davis's "Value of OR: An Economic Study of the Maine Woods."

9 Applicable statutes and regulations.

10 **Q: What is your overall opinion of the project as it has been proposed with regard to**
11 **potential impacts on scenic character?**

12 **A:** Maine has the largest contiguous block of undeveloped forestland east of the Mississippi
13 and that undeveloped landscape is essential to Maine's brand. With much of it managed
14 as working forest the landscape is certainly not pristine or untouched but it appears
15 natural to the casual observer. Forest management activities are present in many areas
16 but the impacts are largely transient and the landscape dynamic. Harvest areas
17 regenerate naturally and commercial forestry has found a symbiotic relationship with a
18 growing outdoor recreation economy. The road network provides access to unlimited
19 hiking, wildlife viewing, fishing, and hunting opportunities. Many roads double as
20 snowmobile trails or UTV routes depending on season. These nature-based or outdoor
21 recreation activities are a growing part of the economy providing diversification from
22 the former majority focus on forestry products.

23 Roughly 36.7 million tourists visited Maine in 2017 many of which came to enjoy the
24 state's natural beauty. The tourists weren't alone in their pursuits however as the
25 Outdoor Industry Association's (OIA) Maine State Report shows that 70% of Maine

1 residents participate in outdoor recreation each year. Campground reservations in Maine
2 State Parks average nearly 40% non-resident campers while the iconic Baxter State Park
3 lures a higher rate of out-of-staters (46% non-resident visitation in 2013). A Maine
4 Office of Tourism contractor Digital Research Inc., surveyed tourists why they chose to
5 visit Maine in 2013 and the top answer was “beautiful scenery.”

6 Maine’s outdoor tourism economy is already strong and if national trends are an
7 indicator it will continue to grow. Noted US Forest Service recreation researcher Ken
8 Cordell analyzes national recreation trends and produces regular reports that help inform
9 land managers, outdoor equipment manufacturers, and a range of investors. In the 2010
10 Renewable Resources Planning Act (RPA) Assessment, Cordell groups outdoor
11 recreation activities into seven assemblages. Of these seven groups, Cordell states “the
12 clear leader in growth of total annual days was the overall group of activities named
13 ‘viewing and photographing nature.’” People love scenery and there is a large body of
14 research that shows with a degree of consistency that people tend to prefer natural
15 appearing landscapes to human-influenced environments. People leave development to
16 enjoy the undeveloped landscapes Maine has to offer.

17 Tourism in the region is built on the scenic integrity of the North Woods. For decades
18 there’s been a movement to designate 3.2 million acres of the landscape as the Maine
19 Woods National Park in part because of the breathtaking scenery. The proposal has
20 been met with opposition largely because national park designation normally precludes
21 the timber management, hunting, snowmobiling and other traditional uses that are part
22 of this region’s fabric. The land use history in the affected region is more consistent
23 with national forest management and the US Forest Service uses the Scenery
24 Management System to manage for defined Scenic Integrity Objectives. The White
25 Mountain National Forest (WMNF) encompasses nearly 800,000 acres of public land in

1 New Hampshire and western Maine. Based on concerns for its scenic integrity the US
2 Forest Service included a guideline in its 2005 Land and Resource Management Plan
3 directing all electrical utility lines of 33 kilovolts or less to be installed by burying
4 unless certain conditions could be met. When the Northern Pass project proposed to
5 develop new transmission lines through the WMNF the US Forest Service approved the
6 project contingent on the lines being buried. According to the decision document
7 “Burial of the transmission line through the WMNF resolved Forest Plan consistency
8 issues related to visuals and effects on the Appalachian National Scenic Trail.”

9 The transmission corridors and lines required by the NECEC project would negatively
10 impact scenic integrity from a wide range of vantage points. The proposal states that
11 only six conservation parcels are crossed but the reality is that the impacts are far wider
12 when you consider views beyond the foreground. Those who live in Maine or come to
13 visit don’t care about scenic qualities just when they’re on conserved lands. Maine has
14 more than 20 million acres of land and the forests of Maine are predominantly privately
15 owned. The most recent Maine State Comprehensive Outdoor Recreation Plan (SCORP)
16 survey indicates that over 50% of each sample group (resident recreationists, non-
17 resident recreationists, and general resident sample) have visited private lands for
18 recreation in the last two years. Many of the private lands that are impacted by the
19 NECEC proposal have high recreation value where the scenic integrity is central to the
20 experience. A scar on the landscape looks the same regardless of who owns the land
21 you stand on.

22 The proposed route seems to have little concern for even the most scenic and iconic
23 places in Maine. People have long recognized the upper Kennebec River watershed as a
24 special place. The river’s extraordinary qualities were documented in 1982 when the
25 Maine Rivers Study was released by the State of Maine in coordination with the

1 National Park Service. They were further documented and protected in 1987 by the
2 Maine Legislature when they stated that the section of river below Harris Dam contained
3 “significant river related natural and recreational values” that “provide irreplaceable
4 social and economic benefits to the people in their existing state.”

5 The outstandingly remarkable values that dominate the upper Kennebec make several
6 segments prime candidates for our nation’s system of Wild and Scenic Rivers. In fact, I
7 believe the river is eligible based on its scenic, recreational and hydrological
8 values. Central Maine Power has a responsibility to prove that its proposed actions will
9 not irrevocably degrade these values and negatively impact the social and economic
10 benefits that they provide.

11 Central Maine Power claims that horizontal directional drilling is not practicable to
12 protect values in even the most scenic sections of their proposed alignment. While it
13 may not seem practicable to CMP it hardly seems reasonable to approve a project that
14 will clearly despoil the scenery on which the area’s economy is based. Lessons learned
15 from Northern Pass and other similar projects should have made CMP consider an
16 alternative that buried transmission lines within existing transportation or utility
17 corridors in those areas having the highest scenic integrity.

18 **Q: What is your overall opinion of the project as it has been proposed with regard to**
19 **potential impacts on existing uses?**

20 **A:** This project as proposed would unreasonably interfere with the scenic character and
21 existing uses of the region. Standing in contrast from the natural environment the project
22 would degrade the very resource—the undeveloped landscape—that attracts visitors to
23 the region and would undermine an evolving economy. CMP has failed to demonstrate
24 that this project will not hurt the outdoor economy which is based on creating
25 memorable experiences in a highly scenic environment.

1 From LL Bean to Old Town Canoes, businesses small and large have been developed
2 around the state's natural resources. According to the Outdoor Industry Association
3 outdoor recreation in Maine generates:

4 \$8.2 billion in consumer spending annually; 76,000 direct jobs; \$2.2 billion in wages
5 and salaries; \$548 million in state and local tax revenue.

6 The state saw an increase in first-time visitors to the state in 2017 with 5.3 million
7 constituting a five-year high. The state also ran its first dedicated winter tourism
8 campaign and off-season visitation increased, with a 13 percent increase in winter travel
9 compared with 2016. These people come to Maine for an experience that can't be found
10 in more developed regions. In response to the forecasted continual growth Maine
11 announced in October 2018 a newly designated Office of Outdoor Recreation. This isn't
12 surprising when viewed in the context of the news delivered earlier in the year by the
13 Bureau of Economic Analysis (BEA). For the first time ever, outdoor recreation was
14 analyzed by the BEA and the agency found it to account for 2% of the country's Gross
15 Domestic Product. Even massive industries such as oil and gas extraction (1.4 percent)
16 and agriculture (1 percent) ranked lower.

17 About 106,800 people had jobs in Maine's tourism industry in 2017, around 16 percent
18 of the state's workforce, according to the Maine Tourism Office. A study commissioned
19 by the Maine Departments of Inland Fisheries and Wildlife and Office of Tourism states
20 that "Collectively, recreational hunting supports more than 3,400 full- and part-time jobs
21 providing more than \$115 million in income. The direct spending by sportsmen who
22 hunt and the multiplier effects of that spending in Maine contribute \$191 million to the
23 state's gross state product and a total economic output of \$338.7 million."

24 In 2016, the outdoor recreation economy grew 3.8 percent, outpacing the 2.8 percent
25 growth in the overall economy, and outdoor recreation businesses are thriving around

1 the country. Implementation of the NECEC proposal would hurt the chances of local
2 businesses realizing the benefits. Recreational as well as guided fishing will be affected
3 by this proposal. One hundred fifteen stream crossings will create negative impacts on
4 Eastern Brook Trout habitat through erosion, sedimentation, and raised water
5 temperatures due to clearing of vegetation. The planned riparian buffers will help
6 mitigate these issues, but such protections are generally not afforded for intermittent and
7 ephemeral channels. The 2018 Special Report on Fishing commissioned by the
8 Recreational Boating and Fishing Foundation and Outdoor Foundation documents that
9 fishing participation grew by 1.9 million individuals from 2016 to 2017 reaching the
10 highest participation rate since 2009. The region is well known for fly fishing and this
11 aspect of fishing had the highest rate of new participants (14.7%). Diminished fishing
12 opportunities in the region due to project impacts will prevent local businesses from
13 taking advantage of these otherwise favorable trends.

14 Likewise, project impacts on wildlife habitat will impede both hunting and wildlife
15 viewing-related businesses. The NECEC proposal includes impacts to 263 wetlands, 8
16 deer wintering areas and 12 units of Inland Waterfowl and Wading Bird Habitat.
17 Construction and maintenance activities will likely disrupt wildlife breeding, travel
18 patterns and other behaviors. Impacts will be most severe during construction but even
19 after completion there will be 53 miles of new corridor to maintain. The sight and sound
20 of maintenance equipment will provide new disturbances to wildlife that formerly did
21 not exist and consequently diminish hunting and associated guiding opportunities.

22 In similar fashion, disturbance and habitat loss will have a negative impact on
23 opportunities for wildlife viewing. Data in the Maine State Comprehensive Outdoor
24 Recreation Plan gathered as part of the National Survey on Recreation and the
25 Environment shows that between 1995 and 2009 the New England region added 2.1

1 million participants in the activity of “viewing wildlife (besides birds)”. No other
2 category added as many participants making this activity New England’s quickest
3 growing. Local businesses specializing in wildlife viewing such as bird-watching or
4 moose tours would be negatively affected by the activities proposed by CMP.
5 Scenic integrity and high-quality recreation opportunities are two characteristics of the
6 area that add to the quality of life, drawing businesses and employees to relocate. The
7 NECEC project would diminish both effectively making it more difficult for existing
8 businesses to attract and retain employees. Likewise, outdoor recreation has shown to
9 have numerous health benefits further enhancing the quality of life for those that engage.
10 As one example, among veterans with PTSD, participation in outdoor recreation
11 corresponds with higher well-being (Vella, E.J. et al. 2013.). This is especially
12 important as proportionally, Maine has a high rate of veterans compared to the national
13 average. [REDACTED]

14 [REDACTED]
15 [REDACTED]
16 Many outdoor businesses are looking to diversify their offerings as a way to hedge their
17 bets such as alpine ski areas that now offer substantial summer activities. Outdoor
18 businesses in Maine’s north woods are beginning to do the same thing in
19 acknowledgment that visitors want high value, high quality, multi-dimensional
20 experiences. Unfortunately, the scale of the NECEC project would make it impossible
21 to ignore and regardless of activity the towers would continue to loom on the horizon
22 diminishing the quality of visitors’ experiences.

23 **Q: Does anyone else share your concerns about the significance of**
24 **the proposed impacts?**

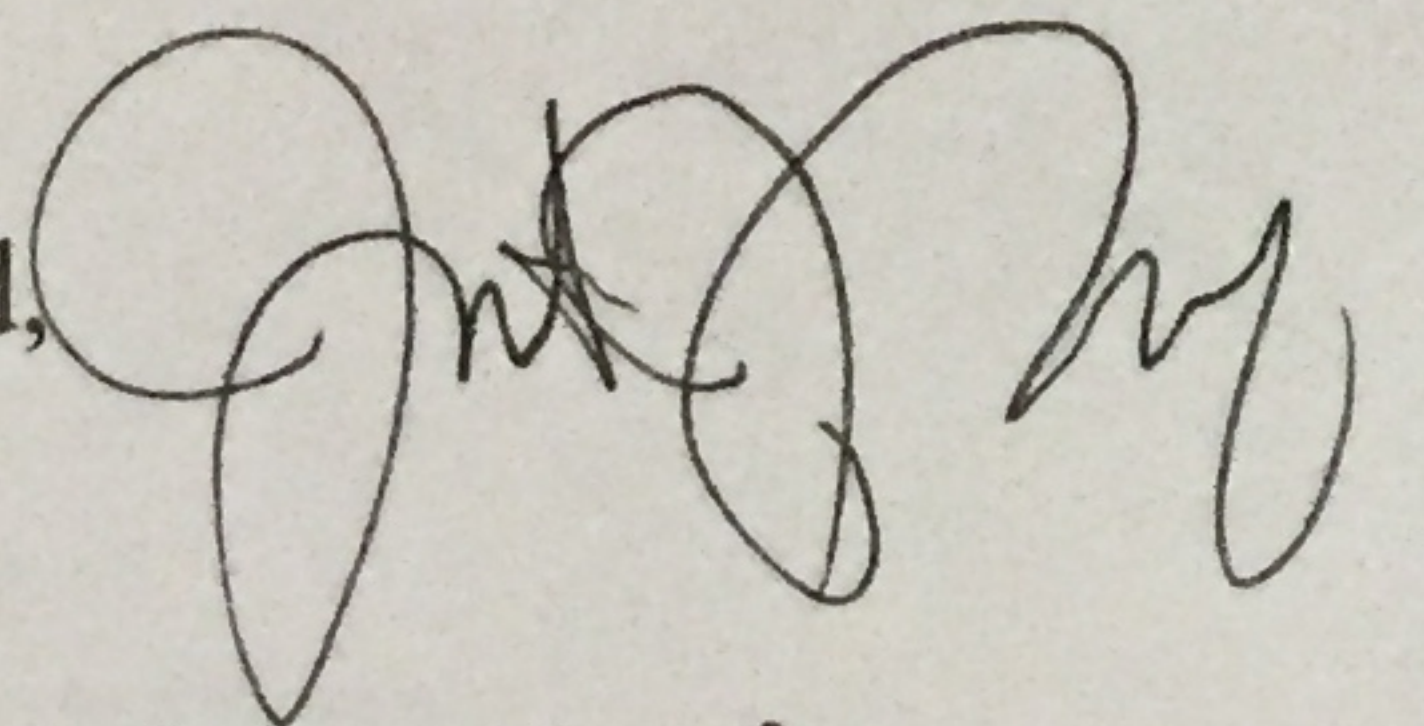
25 **A:** I have discussed the project proposal with many people who share my concerns about

1 the significance of the proposed impacts. This is especially true close to my home in
2 northern New Hampshire where the similar Northern Pass project was recently rejected.

3 **Q: Does this conclude your testimony?**

4 **A:** This concludes my testimony at the current time.

Date: 2/21/2019

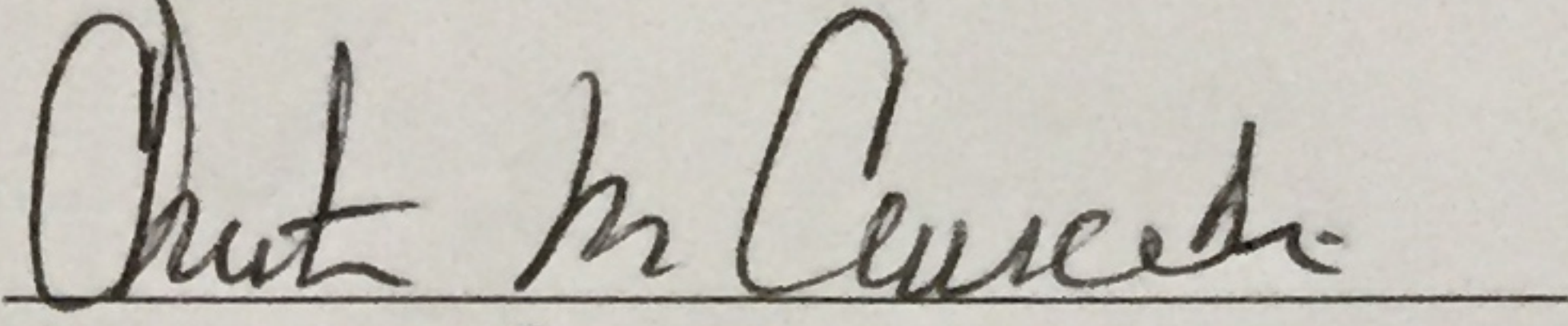
Respectfully submitted, 

By: _____
Print Name: Justin J. Preisendorfer

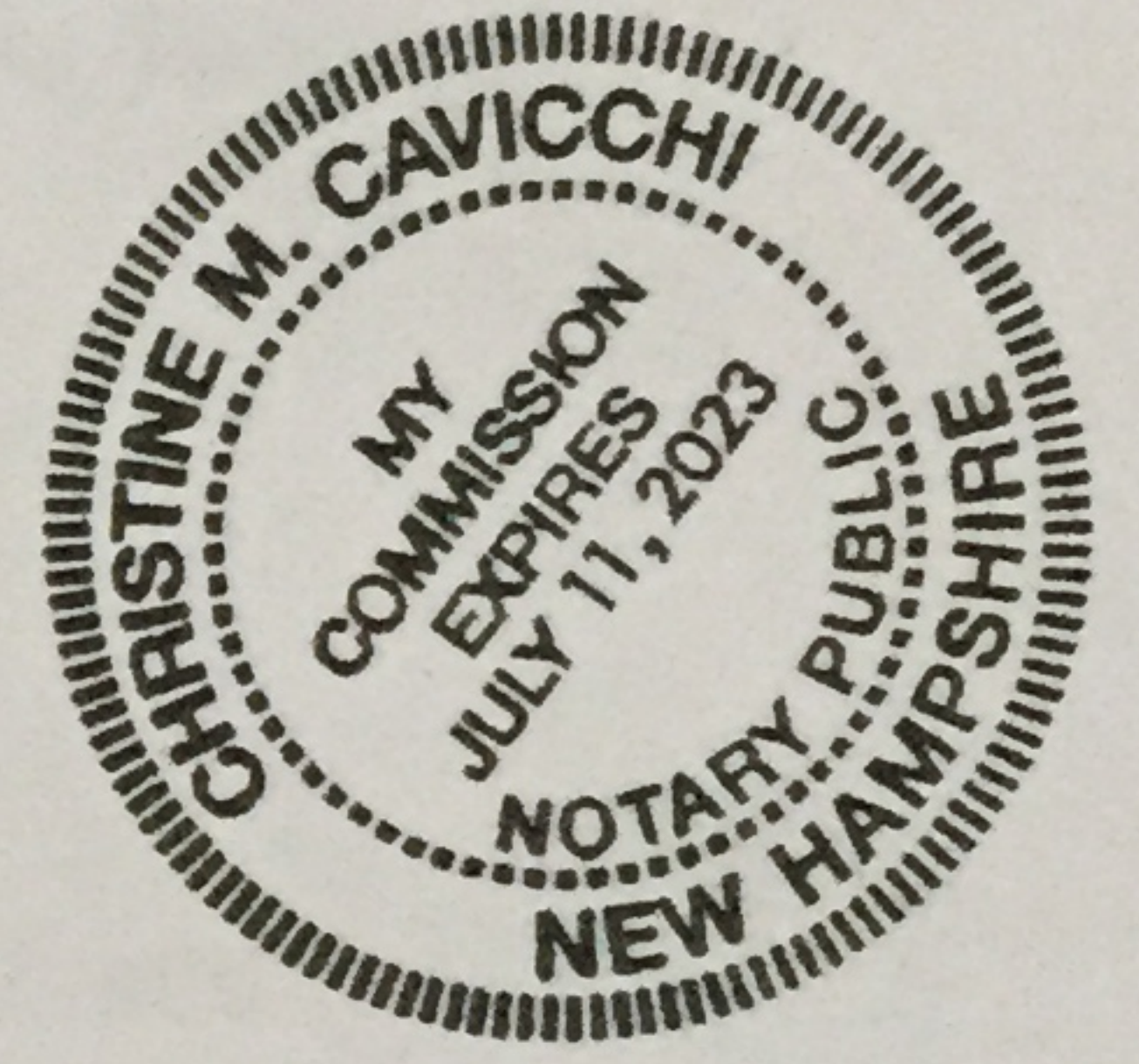
STATE OF New Hampshire
COUNTY OF Grafton

Personally appeared before me on the above-named Justin Preisendorfer, 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,



Notary Public/ ~~Attorney at Law~~
My Commission expires 7/11/23



Justin J. Preisendorfer
Wilderness Specialist

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Relevant Professional Experience

Director & Chair

The Society for Wilderness Stewardship.
October 2017-current

I currently serve as the Chair of the Board of Directors for this 501c3 professional organization whose mission is to promote excellence in the professional practice of wilderness stewardship, science, and education to ensure the life-sustaining benefits of wilderness. Our work includes research, education, assistance to the agencies that manage land under the National Wilderness Preservation System.

Regional Program Manager—Wilderness, Wild & Scenic Rivers, Congressionally Designated Trails

USDA Forest Service; Milwaukee, WI
July-November 2017

In this position I provided oversight and guidance to 17 national forests and one national tallgrass prairie across the US Forest Service's 20-state Eastern Region in matters related to those areas designated by congress as Wilderness, Wild and Scenic Rivers, or National Scenic or Historic Trails.

Director & Treasurer

The Society for Wilderness Stewardship.
October 2014-October 2017

During my first 3-year term this group supported wilderness research and management projects across the country including wilderness character assessments across diverse landscapes. During these assessments our staff document baseline information related to an area's natural and undeveloped qualities.

Supervisory Natural Resource Specialist—Wilderness and Recreation

USDA Forest Service; Gorham, NH
February 2015-November 2017

In this position I managed a staff of up to 20 individuals responsible for all aspects of wilderness and recreation management on the northernmost of the White Mountain National Forest's three ranger districts. Duties included analyzing potential impacts of proposed activities on areas designated as wilderness or inventoried as having wilderness characteristics.

Regional Representative and Chair

USDA Forest Service Chief's Wilderness Advisory Group
October 2009-March 2014

As a collateral duty I served as a member, Vice Chair, and then Chair for this national group composed of field level managers providing advice directly to the head of the Forest Service on matters of wilderness management.

Natural Resource Specialist—Wilderness and Backcountry Recreation Specialist

USDA Forest Service; Campton, NH
June 2011-February 2015

In this position my staff and I were responsible for the management of the largest congressionally designated wilderness area in the east—the 45,000-acre Pemigewasset Wilderness centered on the river of the same name.

Forestry Technician—Wilderness and Backcountry Recreation Manager

USDA Forest Service; Gorham, NH
March 2003-June 2011

In this position I was the wilderness manager for three areas designated by congress including the Caribou-Speckled Mountain Wilderness—the only designated wilderness in Maine managed by the USDA Forest Service.

Relevant Education

- B.S. in Human Ecology, Unity College, Unity, Maine
- Graduate work at Virginia Tech and University of Montana

Relevant Honors

- National Wilderness Workshop (Russellville, AR)—Planning team and moderator 2017
- Wilderness 50th Anniversary National Conference (Albuquerque, NM)—Presenter 2014
- Bob Marshall Champion for Wilderness Stewardship National Award—2013 Forest Service recipient
- 9th World Wilderness Congress (Merida, Mexico)—Invited delegate & presenter 2009
- White Mountain National Forest Wilderness Stewardship Award—2005 recipient (only awarded twice in the last 15 years)
- Frequent presenter for interagency wilderness management trainings delivered by the Arthur Carhart National Wilderness Training Center
- Frequent discussion leader for (under)graduate courses offered through the University of Montana Wilderness Management Distance Education Program
- Member of review team for the US Forest Service's Wilderness Character Monitoring Technical Guide.