

August 6, 2018

## No CMP Corridor through Maine

Dear Mr. Beyer and the Maine Department of Environmental Protection,

I am submitting this letter to the Maine DEP as a public comment regarding Central Maine Power's New England Clean Energy Connect (NECEC) Project, which proposes a 145-mile transmission line from Quebec through Maine to bring electricity to benefit Massachusetts residents. I live in Caratunk, Maine and work as a Registered Maine Guide to provide wilderness experiences on rivers and mountains in western Maine to visitors from across the world, including a majority of clients who hail from the Commonwealth of Massachusetts. I am writing to the LUPC in opposition of the NECEC Project.

Approximately 53.5 miles of new transmission line corridor is slated to blaze through Beattie Township to the West Forks, including one of the last remaining contiguous forests in the United States east of the Mississippi River. This region of Maine includes land, vernal pools, and water areas that are recognized by Federal and State of Maine legislation to include at least eleven species cited as endangered, threatened, or special concern listed under Federal Endangered Species Act (1973) and Maine Endangered Species Act (1975). The NECEC Project will cross 724 water bodies, including some of the most important brook trout spawning and rearing tributaries to the Dead and Kennebec rivers. Construction access roads will span 184 streams. Clearing and construction of access roads and tower foundations may cause sedimentation and other impacts on water quality, which is of great concern in this region due to the number water bodies protected as Maine State Heritage Fish Waters (2007).

The NECEC Project completely disregards the Maine's Natural Resources Protection Act (1988), which states, "The Legislature finds and declares that the State's rivers and streams, great ponds, fragile mountain areas, freshwater wetlands, significant wildlife habitat, coastal wetlands and coastal sand dunes systems are resources of state significance". In 1982, the U.S. Department of the Interior, National Park Service and State of Maine Department of Conservation conducted the Maine Rivers Study to determine waterways in Maine that exhibit highest examples of Geologic / Hydrologic Features, River Related Critical / Ecologic Resources, Undeveloped River Areas, Scenic River Resources, Historical River Resources, and Recreational River Resources. The Kennebec River was rated in the Maine Rivers Study as "AA" or "Best". The NECEC Project application maps the transmission line corridor across the Kennebec Gorge and will include 12-18 orange FAA 3-foot diameter marker balls. The natural resources associated with this river and its surrounding land would be devastated by this intensive interruption of secluded land and pristine waterways due to the creation of infrastructure and expansive 300-foot corridors featuring the 100-foot transmission line towers.

While CMP owns the land along the proposed corridor, it is not in isolation from abutting lands and waterways. For example, the Nature Conservancy of Maine's Leuthold Forest Preserve, encompassing 16,934 acres of forest land southwest of Jackman, includes Number 5 Mountain and the shorelines of seven ponds. Among the wildlife species found in the Leuthold Preserve are pine

marten, gray jay, boreal chickadee, Blackburnian warbler and blackpoll warbler. CMP's proposed NECEC transmission project would run along the southern border of the preserve, with CMP right-of-way immediately abutting the preserve. In addition, the 8,200-acre Cold Stream Forest Public Reserved Lands, recognized under the Land for Maine's Futures Program (1987) and Federal Forest Legacy Program (1990), would be impacted by the new transmission corridor. Thousands of acres of critical habitat supporting winter deer yards will be altered resulting in a detrimental effect on herd health and population. Private land owners abutting the entire corridor will also have the pristine quality of their homes interrupted by the neighboring transmission line while Massachusetts' residents, the recipients and benefactors of this electricity, will see no interruption on their own properties.

Another gem of western Maine is the Old Canada Road National Scenic Byway, which is one of 125 nationally distinguished roadways by the United States Department of Transportation and recognized in 2000. The Byway exemplifies features that are considered representative, unique, irreplaceable, or distinctly characteristic of western Maine. The Byway is one of the largest tourism draws to that region of the state, whose scenic views will be grossly impacted with the NECEC Project construction. In addition, thousands of hikers are drawn to this region as thru or section hikers of the Appalachian Trail, the first scenic trail identified in the National Trails System Act (1968). The transmission line is proposed to cross the Appalachian Trail at three locations near Moxie Lake, which will ruin the span of trail and mountain top views for miles.

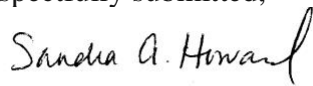
To date, the deadlines to file petitions to intervene to the Maine Public Utilities Commission (PUC), Maine Department of Environmental Protection (DEP), and Maine Public Land Use Planning Commission (LUPC) have passed. However, the number of public comment submissions to these organizations continue to increase. While CMP touts a large endorsement among Maine's residents in support of NECEC, to date only 4 out of 102 public comments to the Maine PUC articulate favorable reports. The only comments in favor of the NECEC Project were submitted by CMP-affiliated individuals and Governor Paul LePage. Out of 23 petitions to intervene on the DEP hearings, 19 petitions express high levels of concern and opposition to the project including the Maine Department of Inland Fisheries and Wildlife, The Nature Conservancy, Sierra Club of Maine, Natural Resources Council of Maine, Maine Wilderness Guides Organization, Appalachian Mountain Club, Friends of the Boundary Mountains, Trout Unlimited, and the Town of Caratunk. The LUPC has not made petitions available to the public to view with the recent deadline of August 2, 2018. It is likely that the LUPC petitions will represent a majority of opposition to the NECEC as was found with submitted petitions and public comments to the Maine PUC and DEP.

A highlighted controversy has also emerged among Maine residents and stakeholders in response to the \$22 million mitigation agreement between CMP and Western Mountains and Rivers Corporation (WMRC) that occurred on June 7, 2018. The MWRC board consists of 10-members, some of whom are not residents in the tri-town area of Caratunk, The Forks, and West Forks - the hub of whitewater, hiking, hunting, fishing, and snowmobiling in western Maine. It is important to note to the DPU and public at large that the consensus opinion among community members along the proposed 53.5-mile new transmission line construction does not support the NECEC Project or the WMRC mitigation. In fact, the Town of Caratunk, a filed petitioner to the Maine LUPC and DEP, had no representation during the extended mitigation negotiations by any

town official. The WMRC memorandum of understanding and mitigation represents the minority opinion to the NECEC Project as evidenced by filed petitions, public comments, and growing membership opposition on the “Say NO to the 145-mile CMP transmission line through Maine” Facebook group.

I urge the DEP to consider Edward Abbey’s words, “A man could be a lover and defender of the wilderness without ever in his lifetime leaving the boundaries of asphalt, powerlines, and right-angled surfaces. We need wilderness whether or not we ever set foot in it. We need a refuge even though we may never need to set foot in it.” The pristine Maine wilderness is an ecological, historical, recreational, and cultural necessity for all in the world, not just Maine’s residents. We are all stakeholders in this proposed NECEC Project, which as planned will have a dramatically negative impact on the pristine and unique qualities of Maine.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sandra A. Howard". The signature is written in black ink and is positioned below the typed name "Sandra Howard, Ph.D.".

Sandra Howard, Ph.D.  
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