

TO:

Maine Department of Environmental Protection
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c/o DEP.... jim.r.beyer@maine.gov

RE: Public Comment Concerning NECEC

FROM:

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Having listened to and participated with numerous conversations, hearings and cross-examinations about NECEC, I remain deeply concerned about the unaddressed social, economic and environmental impacts of this project. I wish to convey to DEP three areas of concern that I have about what is incomplete concerning CMP's proposal. I have respectfully included recommendations-suggestions for each.

#1. INCOMPLETE SCOPE OF PROJECT:

CMP has presented the scope of Segment 1 as a 150 ft. cleared corridor designed for minimal impacts, and mitigation to account for unavoidable environmental damages from their large fragmenting footprint. I do not believe this accurately characterizes the longer-range aspirations for the CMP-HQ-NECE corridor.

CMP's John Carroll stated on Channel 13, "Our real estate rights are 300 feet wide. You have to look ahead. We don't know what the future will call for. When you create a corridor you want to have the real estate for future projects."

CMP understands energy and knows New England's power future will call for more power. Given this energy reality, it's no stretch to anticipate that sooner than later, CMP-HQ will be back at the permitting table, asking for a 300 foot wide, multi-line-tower proposal on their right of way across Segment 1. From the beginning I have argued that a 150-foot corridor is only the first step, one that will incubate more power transmission when it expands into a very large 300 foot-wide footprint and impact. Once the first line is in, it's a done deal that more will follow.

The following photo is an example of a multi-line-tower power line in Maine, 300 feet wide, double the size of CMP's proposed 150 footprint. I argue that the scope of their proposal and its impacts should be accurately re-labeled NECEC 150/300.



Recommendation on Scope: I would encourage Maine DEP and other appropriate agencies to conduct fact finding conversations and independent analysis of the long-term power transmission plans of HQ-CMP, evaluating the degree of feasibility that NECEC will ultimately expand into a 300 foot, multi-line-tower power transmission project across Segment 1, as well as more widening further down the power lines.

Given the high level of public concern about NECEC, the rushed nature of the project, plus CMP declarations about *future project potential* for their 300-feet of real estate, this clearly widens the scope of NECEC to a 300-foot corridor, one that will greatly magnify and expand habitat and scenic impacts. In my view, the extent of impact documentation for this 150/300 project remains incomplete concerning both the current and future project, constituting grounds for DEP denying NECEC a permit.

#2. HABITAT FRAGMENTATION IMPACT'S ARE INCOMPLETE.

CMP's characterizes NECEC as having minimal impact on forests, habitats and wildlife, ignoring the fact that a 150/300-foot corridor constitutes a third then fourth layer of forest change and fragmentation on this landscape. Beyond common generalization, CMP data on existing forest and habitat conditions, as well as wildlife species-specific habitats along the proposed line, seems minimal at best.

As a conservation forester with boots-on-the-ground in Maine since 1965, I find it odd that CMP addresses only four wildlife species of concern: Roaring brook mayfly, salamanders, deer and Eastern brook trout.

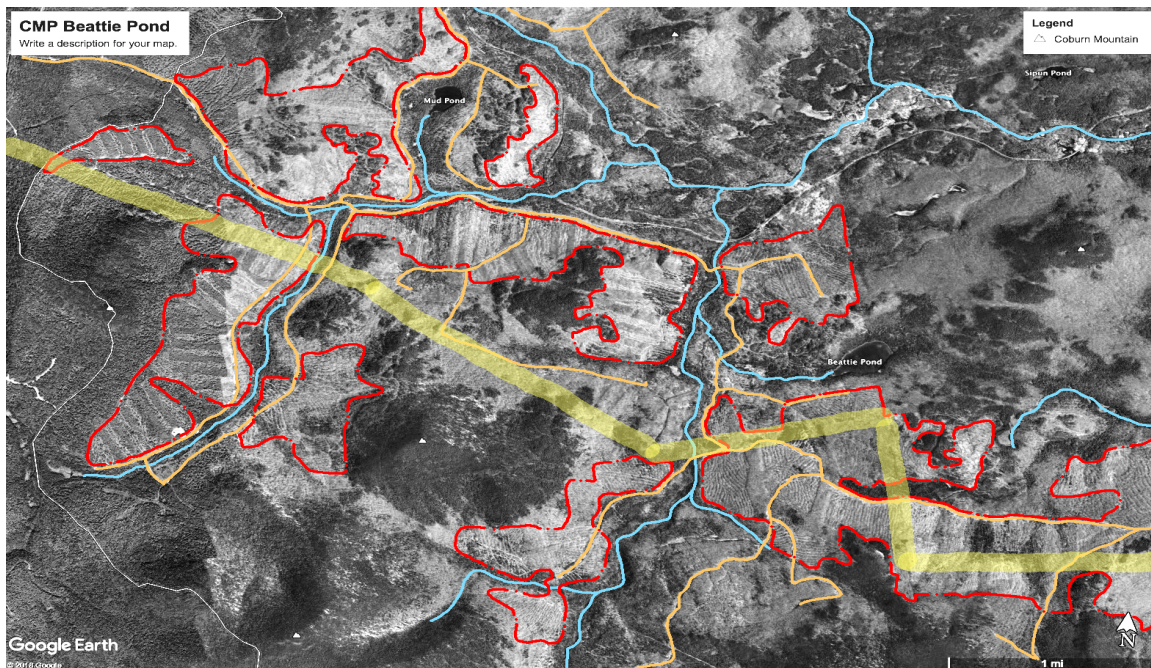
Indeed, these four are important species. But I ask, for a project of this scope is there not more to consider, assess and evaluate concerning the risks of disrupted forest habitats, and impacts on associated wildlife species as a result of NECEC 150/300?

Here are two examples that come to my forestry and wildlife lens concerning Segment 1 of NECEC 150/300.

American Marten occupy middle and older aged forests with continuous forest cover. This canopy structure supports their traveling cross-canopy to escape predators. More important and key to habitat health for the broader wildlife realm, is the fact that in wildlife circles, Marten are known as an umbrella - indicator - species for 40 other vertebrate species in Maine's woods. If habitat for Marten is doing well, then the Marten is doing well and so are 40 other vertebrate species.

Why is American Marten absent in CMP's documentation? If you will, does this not leave the broader base of wildlife unaddressed and at-risk? CMP has given this key indicator species ZERO attention. This is why I am bringing this back to Maine DEP's attention in my argument that DEP deny CMP a permit for NECEC.

A 150/300 foot-wide corridor will re-fragment an already fragmented landscape as illustrated in this photo of Beattie. It will also carve through areas of continuous, un-fragmented forest, habitat associated with American Marten. A 300-foot gap would be a significant barrier to Marten travel. For a project of this scope and magnitude, does this not deserve additional independent assessment and analysis?



Black = Conifers White/Gray = Deciduous Blue = First order streams Red = distinguishes fragmented patches of forest cover from areas of continuous forest cover Brown = permanent gravel logging roads Yellow = NECEC power line corridor

Forest Breeding Songbirds. In my career with UMaine Cooperative Extension, I provided information to woodland owners about forest topics, including wildlife. I recently reviewed the handbook, *Forestry for Maine Birds*, which illustrates forest habitat requirements for 20 species of breeding songbirds in Maine's woods. Many

songbirds are species of interest; some like the Canada warbler are species of concern.

Breeding songbird habitats and requirements are very complex. Some species are coniferous oriented, some deciduous, some both. In one season a single songbird species may occupy the ground, the understory and the overstory, all in the course of meeting the various needs of that species and its brood, out in the woods.

How will NECEC 150/300 impact breeding songbirds in the woods of Segment 1? That remains unknown. CMP's proposal contains ZERO information about this. No field assessment, no data gathering, no analysis to gauge songbird presence and vulnerability. One thing is certain; the 150/300 corridor will remove overstory and mid-story components of forest structure, impacting associated breeding songbird habitat and needs.

Recommendation on Habitat Impacts: I encourage Maine DEP and appropriate state agencies to engage in re-assessment conversations about expanding the limited scope of species to be assessed by CMP. I hope particular attention is given to an independent assessment of Pine Marten and habitat, as well as breeding songbirds, especially species most-at-risk like Canada warbler. Knowing the presence or the absence of these species, and the risks and impacts associated with habitat disruption and clearing, would provide a clearer picture of wildlife habitat impacts from NECEC. The incompleteness in CMP documents convinces me that NECEC should not be granted a permit by Maine DEP.

#3. SCENIC ASSESSMENT INCOMPLETE:

TJDA's visual assessment for CMP was independently reviewed for DEP and LUPC by consultant James Palmer who notes many points of incompleteness in TJDA's Visual Impact Assessment (VIA). Here are a few quotes on the insufficient visual data.

1. "Many photographs were taken, it does not appear that an attempt was made to identify and document representative and worst-case viewpoints for all the scenic resources... There is no clear process that guided the selection of Key Observation Points (KOP's) from the photo inventory... This is the process that would be followed in preparing a Visual Impact Assessment (VIA) for a shopping center.... It is unreasonable to expect less of NECEC simply because it is a bigger project – does it make sense to *lower the standards* for projects because they are bigger?" (Pg. 54)
2. "There is no explanation in the Visual Impact Assessment of how their evaluation is conducted... VIA normally includes a judgment about visual impact – either there will be no impact, or the impact will be minimal, moderate or strong... The only example found in the VIA of a specific scenic resource with more than moderate visual impact, was Rock Pond." (Pg.56)

Palmer's report to DEP and LUPC leaves me with a sense of incompleteness about CMP's Visual Impact Assessment. From my fieldwork in forestry and photography

in the immediate region over the past 30 years, the impact of NECEC on scenic values in Segment 1 seems to have been minimized. When you consider a 150/300-foot corridor, this will significantly contribute to degradation of scenic values and viewsheds, negatively impacting the outdoor recreation and nature tourism that is closely connected to surrounding rural communities and businesses.

Some high value scenic resources are notably missing in CMP's report: Greenlaw Cliffs, Tumbledown Mtn., South Branch Moose River. From my cameras viewfinder, the landscape between Rock Pond-The Notch and over to the west side of the South Branch Moose River is well deserving of being designated a protected scenic landscape, one that can exist within a privately owned working forest, where public access to beautiful scenery is indeed granted, respected and a privilege.

Recommendation on Scenic Impacts: I hope Maine DEP engages with appropriate entities in review/re-assessment conversations about the strengths and weaknesses of CMP's Visual Impact Assessment, and contract for an independent assessment of the full range of visual impacts that will result from NECEC 150/300.

Key to gauging impacts on tourism would be for review agencies to commission an independent study of the attitudes and perceptions of resident and non-resident visitors towards the scenic impacts that NECEC 150/300 will have on the region.



The recommendations I have put forth in this document, could go a long ways towards assuring the proponents, the opposition, the public and institutions of governance, that due-diligence has been taken to independently assess NECEC's full range of costs and benefits. Thank you for considering my words of concern and recommendation to Maine DEP for the NECEC 150/300 Project.

