



# Seven Islands Land Company

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August 9, 2018

Maine Department of Environmental Protection  
Attn. Jeffrey Crawford  
17 State House Station  
Augusta, ME 04333 - 0017

Re: Testimony in Support of DEP petition #176 to withdraw much of Maine from the Ozone Transport Region

Seven Islands Land Co. supports withdrawing most of Maine from the Ozone Transport Region, as proposed in petition #176. EPA's data clearly show Maine has been in attainment with ambient air quality standards for ozone for many years and we do not contribute to any area that does not meet ozone standards. Yet Maine is being held to a higher standard than states/companies with which we compete.

We and our subsidiary Orion Timberlands, manage extensive commercial forest land, supplying wood to numerous pulp & paper mills, lumber/sawmills, pellet mills and wood energy facilities. This ~900,000 acres of well-managed forest also provides recreational opportunities, wildlife habitat, and ecosystem services such as clean water, biodiversity and carbon sequestration. A thriving forest products industry, including all the mills, is essential to continue to manage the forest for multiple uses, provide jobs and contribute to the Maine economy.

Some infer Petition #176 as a "relaxation" of standards, or as "sending a signal that Maine does not care about air quality." That is absolutely not true. Mainers do care about air quality, but we care about other quality of life factors as well, including well-paying jobs, our rural economy, and the sense of place provided by our forests. We are practical enough to know that if something is an impediment rather than a helpful measure, it is time to change.

Petition #176 is science based, data supported, and well thought out. It is time to change. It is not helpful or logical to continue to impose more stringent requirements on Maine's VOC and NOx sources, when Maine complies with the ozone standard and the added controls do nothing to help any other area in the country achieve the standard. Reasonably Achievable Control Technology (RACT) requirements for VOCs and NOx are restricting Maine companies from expansion and the Lowest Achievable Emission Rate (LAER) requirements are an impediment to new businesses locating here.

We are working very hard to grow our Maine Forest economy (with some recent success and more opportunities in the pipeline.) The OTR is contrary. We urge adoption of Petition #176.

Thank you for your consideration.

Sincerely,

John W. McNulty  
President