

From: [Diana Burgess](#)
To: [Hinkel, Bill](#)
Subject: Fwd: Concerned Upper Enchanted Property Owner
Date: Friday, October 11, 2019 2:11:42 PM
Attachments: [image.png](#)

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear LUPC Commissioners,

October 11, 2019

My name is Diana Burgess and I live in Upper Enchanted TWP. I am writing to you regarding the NECEC project and encouraging you to not approve the project based on your principles of sound planning found on your webpage. Beattie Pond should not be the only area that you have concerns with. No areas along the new section should even be considered for approval. I have addressed each one of them from my point of view.

The Legislature created the Commission to extend principles of sound planning, zoning and development to the unorganized and deorganized areas of the State to:

- **Preserve public health, safety and general welfare;**

As we have seen in California, many fires have been started due to poorly maintained transmissions lines. As is proposed in Maine, these transmission lines in California go thru very difficult to reach locations, in undeveloped parts of the state with no full-time, part-time or even volunteer firemen. If such a fire started here, there would be no way to contain it. Many lives will be lost needlessly. Please keep in mind that there are 24 other alternatives to the currently proposed project. Many which are much less devastating to the environment. The Maine State Federation of Firefighters has significant and justified concerns regarding this project! As CMP/Avangrid has proven time and again, they are not capable of maintaining the current infrastructure.

- **Support and encourage Maine's natural resource-based economy and strong environmental protections;**

One of the things that has always made Maine such a great place to live is because they have always protected the environment. My grandfather (Edgar Thomas) was one of the first people to serve on the DEP and he worked relentlessly to protect Maine's waters from contamination by chemicals and by educating people that putting soaps and household chemicals into the waters destroys the ecosystem.

CMP/Avangrid doesn't give a hoot about Maine's environment or how this project will permanently destroy natural habitats and migration routes through the northern woods. CMP/Avangrid only cares about making money. It seems like this bullet item is exactly why you should reject this project. Nothing can be more damaging to the environment than destroying habitats with chemical herbicides to keep growth down. CMP/Avangrid recently stated that they won't spray chemicals but then the question needs to be asked about how they plan to maintain the corridor. Once this project is in place, the destruction cannot be undone.

This picture was taken on my property over the winter which is located south of the proposed transmission line (just a few miles away). These cats (4 total in this picture) will never again be seen in this area. Their habitat is shrinking.



- **Encourage appropriate residential, recreational, commercial and industrial land uses;**

This is not an appropriate commercial land use. They will be cutting 2,000+ acres of forests and not replanting any, as foresters/loggers are required to do. Most people I know do not say “Hey let’s go ride the transmission lines today” or “Hey let’s go hike the transmission line today”. This will cause the loss of thousands of acres of recreational use. Most people come to this area because of its lack of infrastructure and development.

- **Honor the rights and participation of residents and property owners in the unorganized and deorganized areas while recognizing the unique value of these lands and waters to the State;**

I am a property owner in Upper Enchanted TWP and I live and work here. My husband and I purchased this land in 2003 with the understanding that this area is so remote that it will never see the destructive projects that are seen in southern Maine. The land is maintained in the Tree Growth program so it is being responsibly maintained for future wood cuts and natural habitat opportunities. We have built our home with our own blood, sweat and tears. We have always understood that at some point in our lives that we would have to sell and live near medical care. That day is not here yet but when it is and if this project goes through our home will be worth next to nothing. I fully expect we will take a loss if we can sell it at all. I can’t imagine anyone would purchase a home that overlooks a major transmission line.

- **Prevent residential, recreational, commercial and industrial uses detrimental to the long-term health, use and value of these areas and to Maine's natural resource-based economy;**

Study after study shows that living near high power transmissions lines causes extensive health issues. There may not be too many people in your jurisdiction living near the proposed transmission lines but there are thousands of animals and various types of wildlife. This project will shrink the habitat areas of many animals as they will never cross a highpower transmission line. It will kill off many others within the wetlands, lakes and streams in the vicinity off these lines.

If this project goes through, we will leave the area. We likely will not be able to sell our residence and will have to let it sit and waste away. This will create an unbelievable hardship since we will have no money from the sale of this place to start over somewhere else. But I choose not to sit on my deck and stare at a major transmission line. I’d rather be homeless. When we leave this

area, we will also no longer be spending money at all the businesses in Jackman, many in Greenville, Bingham, Solon, Madison and Skowhegan. And can say that we have spent over \$100,000 in this area over the 16 years we have owned this property.

- **Discourage the intermixing of incompatible industrial, commercial, residential and recreational activities;**

I understand that this 53 mile new section of proposed corridor is a working forest and that everyday large swaths of land are harvested for the trees. But these areas are replanted and new growth only takes a few years to begin to mature. However, this transmission line will never be replanted. It will be sprayed with herbicides and be permanent scar on the area. No longer will outdoorsmen and women flock to this area for the serenity. It is not a compatible use of this land. In fact, it would be irresponsible to allow such devastation to occur.

- **Prevent the development in these areas of substandard structures or structures located unduly proximate to waters or roads;**

CMP has a record of not maintaining what they have. I have no doubt that in a few years this transmission line will become substandard and the chance of wildfires will increase significantly.

It is becoming clearer every day by all the new data out regarding this project that it is a bad idea and that other solutions are available and there are more suitable locations such as Vermont's fully permitted underground project.

- **Prevent the despoliation, pollution and detrimental uses of the water in these areas; and**

Herbicides will be used extensively in the corridor. Everything within the corridor and within close proximity will die.

- **Conserve ecological and natural values.**

One of the greatest natural values in this area are the views. Whether from the top of Number 5 Mountain or Colburn Mountain or any of the other surrounding areas the views are everything. When I kayak Fish Pond it is serene and remote. A place to lose yourself in nature. If this goes through the views from Fish Pond and many other such ponds will be destroyed.

I could understand the purpose of this project if the power was desperately needed throughout all of Maine. But this is not the case. This project is strictly for the companies involved to make millions of dollars with all profits going overseas. This makes no sense to destroy the forests for profit. I beg of you not to approve this project.

Sincerely,
Diana Burgess
Upper Enchanted TWP
207-615-4517

From: [Linda](#)
To: [Hinkel, Bill](#)
Subject: Fw: Merrill Strip
Date: Tuesday, October 15, 2019 10:39:09 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.





A friend and I drove through Merrill Strip and walked in to Beattie Pond this weekend. The road to Merrill Strip crosses a branch of the Moose River and several small streams. On our way there we went past many other wild, beautiful places that would be negatively affected if NECEC is approved....Greenlaw Cliffs, Rock Pond, Piel Brook, #5 Mountain,

Spencer Rips Road and more.

This is not a wasteland as it as been described. What we saw were mountains ,bodies of water and forest.

A transmission line does no belong here.

The NECEC should not be permitted to tear up these special places in Maine.

Maine citizens don't want this destruction in our Western mountains.

Please Say No and leave this invaluable section of our State as it is. To do otherwise would be a tragedy.

Thank you.

[Sent from Yahoo Mail on Android](#)

Sheryl Hughey Harth
P.O. Box 136
Jackman, ME 04945-0136
(207) 668-2022
kandog1956@gmail.com

Maine LUPC
Via email to Bill Hinkel
RE: proposed changes to the NECEC corridor

October 15, 2019

Dear Mr. Hinkel and Honorable Commissioners:

As a retired public health nurse from an 8-generation family in the Moose River Valley, I truly believe the proposed NECEC corridor has no place in the western Maine mountains.

The Public is increasingly aware of CMP's plot with Yale University to alter the proposed corridor route by approximately one mile, to accommodate this extremely unpopular merchant project that services Massachusetts' self-imposed carbon mandates. We the People are saying, "Maine is not for sale", but far too many of our electorate are not listening.

The Merrill Strip deserves every bit of scrutiny given Beattie Pond. Regardless of CMP's proposed use of the Merrill Strip to spare Beattie Pond, the NECEC corridor would forever bisect this segment of increasingly rare, contiguous sub-boreal forest east of the Mississippi River. Not only would the 53.3-mile long, 300-foot wide clear cut (for the long-planned, adjacent wind transmission line) permanently remove acres of trees and the carbon banked in each one, it would destroy the canopy supporting countless bird, insect, fish, game, wildlife, grass, shrub, and wildflower species. Consider the same fate in the abutting Canadian corridor running through the Chaudiere River Basin of Quebec Province. Our waterways are connected, our families are related, and our unique way of life is treasured.

The NECEC corridor would forever **contaminate the Moose River** Basin with toxic herbicides. "Approved" herbicides poisoning the ground water and vegetation consumed by fish, birds and wildlife that become part of the food chain feeding my family, friends and neighbors. **I know you are aware Jackman's water supply from Wood Pond is fed by the Moose River**, which then flows to Moosehead Lake, the Kennebec River, and into the Atlantic Ocean.

Clearly, you see our objections to NECEC are far more than NIMBY concerns.

CMP proudly says Mainers are not paying for this project because Massachusetts is footing the bill. That is not how honest Mainers have conducted business with the Bay State since gaining independence from the Commonwealth in 1820. **The western Maine mountains would forever pay the price if NECEC were permitted, and many Massachusetts folks would lose a favorite place to experience the Maine woods.**

Please do not believe CMP's false claims that the proposed corridor is decimated by clear cuts. I want to believe the decision makers in Augusta took time to walk on or fly over **the territory CMP seeks your permission to permanently destroy**. I trust you are familiar with the views welcoming residents and visitors to the Jackman region. The corridor would dominate the entire panoramic view from Attean Overlook on The Old Canada Road Scenic Byway, and the massive towers would loom over the tallest trees along the entire stretch of corridor.

The UGLY BROWN MONSTER would envelop the **Spencer Road** and be visible from every point of elevation along this **true corridor** to off-the-grid homes, camps and businesses, remote ponds and streams, the WWII German P.O.W. Camp Memorial Site at Gerard in Hobbstown, the trailheads to Coburn and #5 Mountains, and the Moose River Bow Trip portage, to name just a few. The massive NECEC infrastructure and subsequent wind projects would be grossly visible from every point of elevation throughout the Moose River Valley. NECEC would forever ruin a significant component of America. **Please, do not be a part of designating CORRIDOR STATUS to the Switzerland of Maine.**

The wilderness provides a refuge from life's demands and respite from the constant stimuli of urban living. That is what the Moose River Valley offers, just as it has since my great-grandparents and grandparents operated sporting camps on remote ponds in the Great Maine Woods. Both locations provide much the same experience today. I served clients living with psychoses, anxiety and neuroses, and the best therapy was a secluded place offering silence to breathe, relax, reflect, release stress and tension, and connect with nature. It is why several **generations of visitors select the Moose River Valley as their place to get-away-from-it-all, year after year**. It is why I left San Diego and the desert southwest to retire back home.

This region provides a **true 4-season-Maine experience**, and winter has become the most important season for many businesses. I have yet to meet one snowmobiler willing to trade these incredible view sheds for permission to ride under a HVDC powerline. The UGLY BROWN MONSTER would be even more apparent against the white backdrop, and **the ride up Coburn Mountain would bring tears to your eyes rather than taking your breath away**.

The permanent environmental damage from this proposed project cannot be separated from the long-term economic impact to the small communities throughout the western Maine mountains. We are a relevant component of Maine Vacationland, and we contribute to Augusta's revenue stream from tourists and vacation homeowners. Keep in mind, the Moose River Valley is the first to welcome international visitors, and we are the warm Maine people setting the tone for their American travel experience. **We live, "Maine, the way life should be".**

No amount of mitigation money can replace what would be forever lost. If NECEC was allowed, the Moose River Valley would sacrifice a significant portion of its carbon bank to accommodate Massachusetts' self-imposed carbon mandates. Hydro-Quebec (HQ) has not proven their hydropower is clean nor substantiated claims of reduced greenhouse gas emissions, and they openly admit to no new power generation for several years. **HQ's absence at every Maine Regulatory Meeting spoke volumes to honorable Mainers.**

The most impacted region, the unorganized territories, would get the least because they are off-the-grid. **That is what makes it the wilderness**. There are no long-term benefits for the

populated communities in the Moose River Valley, as there would be no improvement to CMP's reliability, no broadband, no permanent jobs, heat pumps and electric vehicles would be as unaffordable to most residents as they are today, and many households rely on tourism for their livelihood. **CMP cannot mitigate that.**

There is no place for industrial infrastructure in the U.S. Boundary Mountains or the Moose River Valley. The current wind turbines, visible from far too many vantage points, are more than enough. October 9, 2019, I witnessed the LUPC Commissioners unanimously deny the application for one cellular tower in the Greenville area, due to its visual impact. **That gave me hope the NECEC application will be denied at your November session, considering the exponentially greater impact of the proposed CORRIDORIZATION of the Moose River Basin.** After all, how could you possibly allow thousands of towers with their associated HVDC transmission lines to mar 53.3 miles of wilderness, disrupt hundreds of streams, brooks and tributaries, damage the Kennebec River Gorge, cross the Appalachian Trail three times, and forever compromise significant sightlines and views from every point of elevation along the entire 145-miles of proposed NECEC corridor?

The Maine majority recognize CMP's pledged millions, doled out over 40 years, are far too enticing to far too many of our electorate across this great state. **We the People now ask those who recognize the eternal value of the western Maine mountains to convince your peers NECEC is of little long-term benefit to Maine.** The Maine majority have come to recognize it is however, of tremendous long-term benefit to far too many of the electorate and their inner circle. That is not how honorable Mainers serve their constituents, and We the People of Maine are growing weary and intolerant of those who fail to listen to their employers.

You have the authority to preserve this significant component of American wilderness, save our brand, secure our long-term economy, and sustain our very way of life. We the people ask you to **put Western Maine before Quebec, Spain and Massachusetts by saying no to NECEC.** We the people of Maine ask you to weigh CMP's pledged millions against the forever impact of destroying these priceless components of Maine Vacationland.

Vermont will accommodate Massachusetts' energy needs and carbon plan, and CMP can redirect their priorities to providing reliable service and accurate billing for their monopolistic Maine customers. That is, if Maine allows them to continue operations in the Dirigo state.

Thank you for your careful consideration,
Sheryl Hughey Harth, RN

cc: Governor Janet Mills
Jim Beyer, Maine DEP
Jay Clement, Army Corps of Engineers





1944



1946

FOREST HILLS EIGHTH GRADE
CLASS OF 2007
SERVICE LEARNING PROJECT

DONALD B. ...

From: [Richard Barringer](#)
To: [Hinkel, Bill](#); [DEP, NECEC](#)
Subject: NECEC
Date: Monday, November 4, 2019 9:42:33 AM
Attachments: [image.png](#)

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

DATE: November 4, 2019

TO: Members, Maine Board of Environmental Protection
Members, Maine Land Use Planning Commission

RE: Central Maine Power's Project: New England Clean
Energy Connect (NECEC)

Dear Board Members and Commissioners,

I believe there is no time to waste when it comes to implementing clean energy policies for Maine and all New England.

The NECEC project has undergone lengthy review, and an improved, alternative route is now proposed and under consideration in northern Franklin County – the Merrill Strip rather than the Beattie Pond route.

The Merrill Strip alternative is at once shorter and less impactful, and ought therefore to be approved by you, our regulators.

With thanks for your continuing service, sincerely,



Richard Barringer

Former Commissioner, Maine Department of Conservation, and
Emeritus Professor, Edmund S. Muskie School of Public Service

Richard Barringer
22 Hancock St. Unit A-208
Portland ME 04101-4878
richard.barringer@maine.edu
207-871-7890

November 4, 2019

Dear Maine Regulators:

CMP recently made a small but important change to its application for the New England Clean Energy Connect. The change involves incorporating one mile of the Merrill Strip instead of the original plan for following 1.4 miles through the Beattie Pond recreation subdistrict. While this change is under review by you, I wanted to comment.

I believe that this new alternative is preferable, and while I have always supported this project for a number of reasons, including its far-reaching benefits to the State of Maine and the entire New England region, this change presents an improvement: it will impact fewer wetlands and vernal pools, and have fewer visual impacts.

Minor changes such as this are a regular occurrence and my hope is that this change will not hold up your approval process. The area in question is commercial, cut over forest land, not a park. The route continues to present a very good path to future clean energy.

Thank you.

Delbert Reed
14 Brookside Lane
Freeman Twp., Me 04983

Lloyd C. Irland
174 Lord Road
Wayne, Maine 04284

Sent by e-mail to:

Jim Beyer NECEC.DEP@maine.gov

Bill Hinkel bill.hinkel@maine.gov

Re: Merrill Strip amendment to NECEC application

Dear Sirs,

I have previously commented in more detail on this application. It would seem desirable that the regulatory process encourage applicants to submit improvements to their proposals – which this certainly appears to be. Specifics on the new route will be before you and subject to debate as they should be. Now that a public proceeding is being reopened, it does not seem necessary to recap all the details of my previous submission. Yet, certain points remain true:

First, much of the debate has concerned issues not really relevant. For example, much is made in the letters to the editor and the public testimony of the fact that CMP will earn some profit, and so will a Quebec utility and a Spanish one. Ask yourself this: if this project were proposed by a totally state-owned utility, with no other investors, would it then be OK?

It seems to me that the record has been filled with claims of environmental harm that are exaggerated if not fictitious. Long laundry lists of mileages, numbers of stream crossings, etc., do not establish impact.

Further, the power will benefit the grid, even though its immediate buyers are in Massachusetts. Strange that powerlines, gas pipelines, and gasoline and fuel oil delivery systems bringing Mainers energy are OK -- but the same facilities bringing energy to Massachusetts are not.

Finally, the claim that the corridor defaces a pristine wilderness is simply imaginary. This closely managed, private forest has not been a wilderness for more than a hundred years. Ironic that visible among opponents are snowmobilers, who would not be

allowed in if this area were managed as a pristine wilderness. Recreational visitors drive under or along power lines to reach remote forests, and paddle calmly along rivers, in many places in this state.

Claims that the area's tourism economy would be placed at risk and a way of life destroyed are products of a skillful and costly fear campaign. They should not be given any weight in your deliberations.

What you should consider would be the effect on the state's already shaky reputation as a location for large investments. Other states will be delighted if Maine declines to permit this project – it would surely knock Maine down a notch on lists of potential locations used by company managements.

Thanks for considering these views,

Lloyd C. Irland

Wayne

From: [Thomas Costello](#)
To: [Hinkel, Bill](#)
Subject: Project questions and concerns
Date: Tuesday, November 26, 2019 4:54:32 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

First, I'd like to note, at this time I am neither for or against the project...I need more answers.

Answers to a number of questions and concerns regarding the actual route, need, and environmental effects. For now, I'll focus on my greatest concerns, the steel structures and associated drilling and/or rock smashing/blasting techniques used to accomplish the large holes these structures will be set into and

Questions below are concerning the new route/corridor, as well as, any and all structures associated with the project along existing corridors. Please answer as detailed as possible to avoid further questions.

As an abutter to the 345kv transmission lines 75 ft from my house which I believe will see a current increase as a result of this project, I'd like to RESPECTFULLY REQUEST the answers to the following question...

- Please provide a diagram/blueprint drawing of any and all structures proposed...with measurements included. Specifically, measurements of the embedded portion, depth, height, width of hole and width of structure . What materials are used to back fill? What chemicals are included in the backfill materials? How many cubic feet of permanent damage per hole and per structure?

---Has the geology been evaluated?

---Depth to bedrock?

---Water table

---PH of soils

---Endangered habitat, animals, and plants

---How wide will the holes be?

-Is there some sort of mining permit necessary for the project? If do, you provide me a copy, I couldn't find anything in the docs.

-How many holes, total, throughout the state are necessary to accomplish the project?

-What are the adverse effects associated with the drilling, such as...

----Land disturbances to soils and ledge

-----How far these disturbances will be felt

-----Any expected/unavoidable and/or avoidable damage as a result of land disturbances to the environment or private property, such as, private wells, foundations, or other private property?

-What are all the possible chemicals that have the potential of making into the groundwater/drinkingwater thru the drilled hole, accidentally or intentionally, such as, in cement, fluids, anti-corrosion paints

-How can this work effect the structural integrity of nearby private wells with the majority being bedrock wells? My concern is with the vibrations/ground disturbances of all work and especially concerned with the drilling creating new fractures, altering existing fractures, and effecting or destroying the well casings or private wells

- If groundwater/drinking water is encountered when drilling, how will this effect the water quality

-How will this current make it to Massachusetts? Specifically, what transmission lines will be uprated or see an increase in current?

-Has any work already been accomplished to accommodate this project?

Thank you in advance

Best Regards,
Tom Costello

From: [Richard Anderson](#)
To: [Hinkel, Bill](#)
Subject: NECEC
Date: Friday, November 22, 2019 1:26:44 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Bill Hinkel, The Merrill Strip alternative which is part of the NECEC application is a good amendment to the original application. It will have fewer impacts on wetlands, it will have less of a visual impact, it is shorter in length by almost one half mile and it follows a path through a commercial forestland where trees have long been harvested. There is no reason in my opinion , why this alternative should hold up the application.

Thank you for your consideration.

Richard Anderson, Former

Commissioner of the Maine Dept. of Conservation
166
Portland, Maine 04101

75 State St, , Unit

From: Paul and Liz Frederic
To: [Hinkel, Bill](#)
Subject: NECEC Rerouting through Merrill Strip
Date: Tuesday, November 26, 2019 4:16:50 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr Hinkel;

I am the former director of the Maine Land Use Regulation Commission and write to support the proposed change in routing the NECEC corridor to the south of Beattie Pond through Merrill Strip. This is a better option than the original route which presented challenges with the pond. The Merrill Strip land is not in a protected sub-district, is a working woodlot and the location would result in fewer environmental impacts. Application processes often involve amended details as the project works its way through the review process. The end result is almost always better. This change should be supported and I encourage the Land Use Planning Commission to approve the NECEC line.

Sincerely,

Paul B. Frederic, Ph.D. Geography

Former Director of the Maine Land Use Regulation Commission

From: [Sarah Ayres](#)
To: [Hinkel, Bill](#)
Subject: Reroute of the NECEC
Date: Tuesday, November 26, 2019 2:46:21 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern:

I write in support of the reroute of the NECEC through Merrill Strip township. It actually seems like a better route though I think in general the impacts to Beattie Pond have been overstated. In following the issues around this project, it is clear that many people have no understanding of the commercial forest. Calling this area pristine wilderness is a total falsehood, but that is how project opponents are winning supporters. I trust your agency will stick to the facts and not be swayed by all of the hyperbole.

This is an important project for Maine and the region, and I feel strongly it should be approved.

Thank you for your time and attention to this matter.

Sincerely,

Sarah Ayres

(Lifetime Mainer, temporarily relocated for work reasons)

--

Sarah Ayres
sayres11@gmail.com
(207) 318-4536,

--

Sarah Ayres
sayres11@gmail.com
(207) 318-4536

From: [David Hyde](#)
To: [Hinkel, Bill](#)
Subject: Re-routing
Date: Tuesday, November 26, 2019 2:47:39 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bill

I think that the move to re- route the line through Merrill Strip is a really positive step for the Hydo Quebec project. It's a good strategic step for a project that should be approved.

David Hyde

Pownal

Sent from my iPhone

From: [Craig Blake](#)
To: [Hinkel, Bill](#)
Subject: New England Clean Energy Connect
Date: Tuesday, November 26, 2019 9:14:15 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Because we support clean energy, we are writing you regarding the New England Clean Energy Connect. We've got small children and feel that we must do everything possible to ensure a clean energy future and cut our emissions significantly over the next 10 years.

This project is a good one and provides a solid solution to New England's clean energy goals. I'm aware that the project made a minor adjustment to the northern route. It now will utilize a path through Merrill Strip rather than going around Beattie Pond. This adjustment is almost ½ mile less in length and this shorter route will have less environmental impacts. I support this adjustment and hope you will too.

For our childrens' future, let's move this project forward. Thank you.
Cary and Craig Blake, George St. Portland, ME

92 Fawn Hill Road
Upper Saddle River, NJ 07458
November 26, 2019

Via E-Mail: Jim.R.Beyer@Maine.gov

James R. Beyer
Regional Licensing and Compliance Manager
Bureau of Land Resources
Eastern Maine Regional Office
Maine Department of Environment

Re: **Casavant Legacy Property: 174 Acres at Allen Pond**

Dear Mr. Beyer:

I am the Trustee of the Dominique P. Casavant Irrevocable Trust (the "Trustee"). The Trust owns a ½ interest in a 174 acre property (Map-Lot 08-019) located in Greene Maine, a portion of which is lakefront property (the "Property"). My cousin, Marc Casavant, is the owner of the remaining ½ interest. The Property is a legacy piece of real estate. I believe that my grandfather, Dominique J. Casavant, purchased the Property in the late 1940's. After my grandfather's death in or about 1963, the Property devolved to his spouse, my grandmother. Upon my grandmother's death in 1988, ownership of the Property passed to my uncle (Robert Casavant) and my father (Dominique P. Casavant) in equal shares. When my uncle died in 2002, his ½ interest was devised to his son Marc Casavant (my cousin). The Trust has been the owner of my father's ½ interest since his death, on January 16, 2015. My father, who often referred to the Property as his father's "Shangri La," shared his father's sentiments about the Property.

It is in this context that I was disconcerted to learn – from you, not Central Maine Power ("CMP") -- of CMP's plans for a high-voltage direct current transmission line on the Property. As you have conceded, I had no notice of the public hearing on those plans, since CMP only provided notice to Marc Casavant, and not to me. While you advised that CMP is only required to provide notice to the landowner whose address is on the tax records, strict adherence to the literal terms of that regulation would permanently render the Trust a second class citizen not entitled to notice and an opportunity to be heard since the Town of Greene cannot put more than one landowner's address on its tax rolls.¹ That simply cannot be the law. I have also learned that the record was actually re-opened in or about September or October of 2019 --- the precise time frame when I raised with

¹ In fact, shortly after my appointment as Trustee of the Trust (i.e., in 2015), I asked the Town of Greene whether my address could be put on the tax rolls and was advised that it could not because its software only accommodates one address. I repeated that inquiry to the Town of Greene after I received the certifications of mailing you sent to me a few months ago and received the same response.

you the lack of notice to the Trust by CMP² – a fact you neglected to mention until November 22, 2019, despite my inquiries.

CMP's plan to construct high-voltage power transmission lines, which will dwarf considerably the existing power lines on the Property and be clearly visible from the lake, will decimate the value of the Property – a valuable Trust asset. As Trustee, I am charged with protecting Trust assets and to do otherwise is a breach of my fiduciary duty – as well as of the trust my father placed in me at the time of his passing. I understand that CMP rerouted its planned high-voltage transmission line to avoid a prized apple orchard located in Greene Maine (whose owners apparently had notice and ample opportunity to be heard) and Beattie Pond. CMP should be willing to do the same for the Trust. Alternatively, CMP can bury its high power transmission lines on the Property like it is doing in certain areas in western Maine. If CMP somehow cannot, or simply will not, accommodate the Trust's reasonable requests, then CMP must compensate the Trust for the significant financial harm that will ensue to the Trust as a result of its actions.

In addition to the considerable financial harm to the Trust, CMP's plan will cause irrevocable harm to the environment, as set forth in detail in the April 25, 2019 letter of Beth Alafat, Acting Chief, Wetlands Protection Unit of the United States Environmental Protection Agency to Robert Desista, Acting Chief, Regulatory Division, U.S. Army Corps of Engineers. (Copy enclosed). The issues Ms. Alafat raises therein, particularly at pp. 4-5, apply with equal force to the Property. As I indicated in my email of September 26, 2019, it is my understanding that CMP's proposed high-voltage transmission line passes through an area on the Property which is designated as a wetlands.

Finally, it is my understanding that none of the adjacent landowners, many of whom have lakefront properties, had (at least until recently) any knowledge whatsoever of CMP's plans with respect to the Property. I have no doubt that these adjacent landowners will be unpleasantly surprised to learn of CMP's plans regarding the Property – since their property values, like the Trust's property value – will likewise be negatively affected. I also have no doubt that these adjacent landowners share my concern about the irrevocable harm to the environment. Indeed, many of these property owners may already be planning to attend the public hearing with the Army Corps of Engineers scheduled for Thursday December 5, 2019 in Lewiston, Maine and will at that time realize the direct effect on them – and on future generations -- of CMP's planned high-voltage transmission line.

Please confirm your timely receipt of this correspondence. As you agreed, I trust you will promptly forward this letter to CMP and ask that you copy me on such correspondence. To the extent that I have inadvertently excluded any individuals involved in the regulatory process with respect to this project, I ask that you also forward this letter to them as well given the exceedingly narrow window accorded to the Trust for lodging objections.

² See my emails of September 26, 2019, October 9, 2019 and October 18, 2019.

I look forward to CMP's -- and your -- very prompt resolution of the significant legal and other issues raised herein and can be reached at 917-439-9427 (personal) or 212-485-9941 (work).

Sincerely,



Catherine L. Casavant, Esq.

Encl.

Jay L. Clement (via email w/encl.: Jay.L.Clement@usace.army.mil)

Thomas Martin (via email w/encl.: Thomas.Martin@legislature.maine.gov)

Bill Hinkel (via email w/encl.: Bill.Hinkel@maine.gov)

Marc Casavant (via email w/encl.: MCasavant@eabministries.com)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

5 Post Office Square, Suite 100
Boston, MA 02109 - 3912

April 25, 2019

Robert Desista
Acting Chief, Regulatory Division
U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742

RE: Public Notice 2017-01342
Central Maine Power New England Clean Energy Connect
Electric Transmission Line Project

Dear Mr. Desista:

This letter provides comments on the U.S. Army Corps of Engineers (USACE) Clean Water Act (CWA) Section 404 public notice for the Central Maine Power (CMP) New England Clean Energy Connect (NECEC) proposal to build new and upgraded electrical transmission lines and related facilities to deliver up to 1,200 megawatts of electrical power from hydroelectric sources in Quebec to New England. EPA comments are largely focused on procedural and assessment issues, with recommendations for a complete application document, a comprehensive alternatives analysis, and reissuance of the Public Notice. EPA is not taking a substantive position on the project at this point.

The New England Clean Energy Connect project was selected following a request for proposals by the Massachusetts Department of Energy Resources seeking Long-term Contracts for Clean Energy Projects pursuant to Section 83D of Chapter 169 of the Acts of 2008, as amended by chapter 188 of the Acts of 2016, *An Act to Promote Energy Diversity*. The USACE also serves as the lead federal agency for the National Environmental Policy Act (NEPA) for this project.

The applicant's preferred alternative for the proposed project will consist primarily of the following:

- 53.5 miles of new HVDC transmission line, from the Canadian border to the Forks, located within a previously undeveloped 300-foot wide transmission line corridor;

- A 94-mile upgrade (widening) of an existing transmission line corridor (approximately 75' on average);
- Two 115 kV transmission line rebuilds between Lewiston and Pownal;
- Upgrades to 26.5 miles of 345 kV transmission line between Windsor and Wiscasset;
- A DC to AC Converter Station and associated approximately 1.2 mile 345 kV transmission line in Lewiston;
- A new substation and associated approximately 0.3 mile 345 kV transmission line in Pownal;
- Additional equipment installation and upgrades at Larrabee Road Substation (Lewiston), Crowley's Substation (Lewiston), Surowiec Substation (Pownal), Coopers Mills Substation (Windsor), Raven Farm Substation (Cumberland), and Maine Yankee Substation (Wiscasset).

The new transmission lines are proposed as an aerial installation on a new or expanded cleared corridor, including at all waterway and wetland crossings, with the exception of the Kennebec River Gorge, where transmission lines will be installed beneath the upper Kennebec River via horizontal directional drilling.

The proposed CMP project directly impacts 4.9 acres of wetlands, as well as numerous streams and vernal pools. The project will also cause temporary and secondary impacts to aquatic resources, including impacts to hundreds of acres of wetlands, mostly from vegetation clearing and installation of construction mats, as well as impacts from tree clearing adjacent to streams and vernal pools.

The applicant has proposed a compensatory mitigation plan including preservation of 1,022 acres of land and a payment of approximately \$3 million into the Maine In-lieu-Fee (ILF) program. CMP also proposes preservation of other parcels and additional monetary contributions to offset impacts regulated under other programs, such as those that deal with rare species and fish and wildlife habitat protection.

Project Coordination

Recent opportunities for EPA to participate in interagency coordination on this project have been limited to our participation in a conference call with USACE staff and the applicant on March 19, 2019. During that conversation we received a general project update and were informed that the project had been revised several times since the Corps permit application was submitted, and that updated information on the project is located on the MDEP website. We requested information to support our review of the project, and CMP provided links to various documents on April 1, 2019 (a week after the public notice was issued) that included an Excel spreadsheet containing links to numerous documents. While EPA has only had limited time to review these documents in detail, some of the information presented appears to have bearing on the Section 404 permit review, while other information appears to be unrelated to the Section 404 review.

Based on conversations with USACE staff, we understand that the public notice for the project was issued in an attempt to synchronize the USACE review with the State review and public hearings held on April 1 through April 5, 2019. We also note that the State public hearings are being continued on May 9, 2019, and that final briefs and final minutes for the hearings will not be available until late May, 2019, well after the April 25, 2019 close of the public comment period.

We understand that USACE staff was available at the early April hearings to answer questions from the public regarding the CWA Section 404 permitting process. USACE participation in the state hearings seems reasonable and we support efforts to increase public understanding of the USACE process. However, based on the limited project information available at the time of public notice issuance (including the absence of a complete, up-to-date Section 404 application with a comprehensive alternatives analysis), the lack of adequate time to review recently submitted project information, and the fact that information presented at the state hearings will not be available until after the close of the public notice period, we believe the public notice was issued prematurely for the project. A suggested remedy for this deficiency is described below.

Information Required for Project Review

As the lead Federal agency for the review of the project under NEPA and for CWA Section 404 permitting, USACE holds the primary responsibility to coordinate both in a predictable and transparent manner. The lack of an organized, consolidated presentation of complete project information to support the CWA Section 404 permit evaluation, combined with the premature public notice and inadequate time for review of current and anticipated additional information, is inconsistent with those goals.

To address these issues, we request a complete and up-to-date CWA Section 404 application, revised to reflect the project as currently proposed. The application should include a detailed alternatives analysis, and other supporting information to address project compliance with EPA's CWA Section 404(b)(1) guidelines. Currently, information on the project appears to be located in part with the USACE and in part on the ME DEP website. This information is voluminous and does not appear to all be directly related to the CWA Section 404 permit review. We recommend that the information necessary to support the USACE CWA Section 404 permitting decision be consolidated, organized, and provided by the USACE in manner that affords local, state, and federal agencies and the public a reasonable opportunity to review and comment on the project.

EPA also requests copies of or links to the final minutes of the state public hearings held in early April 2019, and scheduled to be continued in May 2019, along with any subsequent hearing submissions, briefs, final public comments, or other information pertinent to the CWA Section 404 permit evaluation, so we can consider that information as part of our review. It is our understanding that final hearing information will be available in mid-to-late May.

Request for Reissued Public Notice

One way to address the deficiency of important project information available during the comment period would be for the USACE to issue a revised public notice for the project. We recommend that the USACE take this step and that the revised public notice specifically reference the USACE responsibilities pursuant to the CWA Section 404 process and as the lead federal agency under the National Environmental Policy Act. We recommend that the notice provide a link to the draft Environmental Assessment the USACE is developing for the project. The revised notice should also explain that responses to the public notice will be considered by USACE to determine what issues should be assessed during the review of the project and whether project impacts warrant the preparation of an Environmental Impact Statement.

Impacts to Aquatic Resources

Degradation or destruction of aquatic resources correlates with loss of ecological functions and services, including habitat destruction, reduced primary and secondary productivity, and alteration of hydrological functions (e.g., flood storage, low flow maintenance, nutrient and toxicant transformation, sediment trapping, and groundwater discharge and recharge). These resources would be further impacted indirectly through temperature increases, removal of overwintering habitat, and reduction of overall productivity.

As proposed, the project would cause direct and secondary impacts to many wetlands, streams and vernal pools. The proposed project would fill 4.9 acres of wetlands and cause substantial temporary and secondary impacts to aquatic resources, mostly from vegetation clearing in forested wetlands and the removal of trees next to streams and vernal pools. The transmission line would clear 1,800 acres of land and cross more than 200 rivers, streams, and brooks, removing over 11 linear miles of riparian vegetation adjacent to these aquatic resources. The project would impact hundreds of acres of wetlands, including 242 vernal pools, mostly through secondary impacts.

Vernal Pools

High value vernal pools are one of the most valuable aquatic systems we have in New England, rivaling salt marshes in their productivity, yet the bulk of breeding animals only use them in the spring. These animals typically live in the forest and must travel to and from the vernal pools each year. Tree clearing near vernal pools would cause secondary impacts to the pools, especially where clearing occurs within the 100-foot envelope adjacent to the vernal pool. This 100-foot envelope is of critical importance to vernal pool ecosystems, containing vegetation that provides shade, regulates temperature, maintains water quality, contributes leaf litter and woody debris, and provides terrestrial habitat for pool-breeding amphibian populations. Juvenile pool-breeding organisms are particularly susceptible to loss of tree canopy in the areas immediately surrounding vernal pools.

Wetland Conversion

The proposed project will result in considerable conversion of forested wetland cover, both in the new alignment areas and along the widening of existing corridors. Due to the nature of the maintained corridor, this forested wetland conversion will be permanent. Conversion of forested wetlands to emergent and scrub-shrub systems can have major ecological impacts by changing habitat types, community structure, and wetland functions and services.

Temporary Impacts

While not permanent, temporary impacts can be extensive and persist long after the initial impact causing activity. For example, even after temporary fill is removed, the resulting soil compaction can greatly alter surface and groundwater flow in and near the site of the temporary road or work area. These areas can take much longer to revegetate and can serve as vectors for invasive species to gain a foothold.

Fragmentation

Construction, operation and maintenance of the new transmission lines along Segment 1 between the Canadian border and the Forks would result in extensive secondary impacts. For example, tree clearing, especially along linear corridors, would fragment forests which would result in changes in the vegetation community, reduction of interior forest available to area-sensitive species, increased nest predation and parasitism in forested areas adjacent to the clearing. As a result, secondary impacts would extend well beyond the project footprint, resulting in a loss of biological diversity. Aquatic dependent birds such as Louisiana waterthrush, northern waterthrush, hermit thrush, yellow-throated vireo, and red-shouldered hawk, are especially vulnerable to fragmentation.

Cumulative Impacts

In addition, the cumulative effects of the proposed project in combination with past, present or reasonably foreseeable future development need to be further assessed and described. For example, the new transmission lines in Segment 1 are proposed to be installed on a 300' wide new corridor, with only 150' of the new corridor being cleared for the proposed project. It is not clear from our review whether the remaining 150' of the new corridor might be cleared or expanded at some point in the future for new transmission projects or other development.

Given the substantial aquatic impacts described above, it is especially important to conduct a complete alternatives analysis with the goal of avoiding and minimizing project impacts, fully considering alternative border crossing locations, alternative transmission line routes, and alternatives to aerial installation. The analysis must consider alternatives and design measures to avoid, and where unavoidable, minimize impacts to aquatic resources.

Alternatives Analysis - 40 CFR 230.10(a)

EPA's CWA Section 404(b)(1) guidelines set forth the environmental standards which must be met in order for a CWA Section 404 permit to issue. Two key provisions of the

guidelines are critical when considering the proposed project. First, the guidelines generally prohibit the discharge of dredged or fill material if there exists a practicable alternative which causes less harm to the aquatic ecosystem. This fundamental requirement is often expressed as the regulatory standard that a permit may only be issued for the "least environmentally damaging practicable alternative" or LEDPA. The term "practicable" means available and capable of being done after taking into consideration cost, existing technology and logistics in light of overall project purposes [40 CFR 230.3(q)]. Where, as here, the project is not water dependent and involves fill in wetlands and other special aquatic sites, practicable, less environmentally damaging alternatives are presumed to exist unless clearly demonstrated otherwise by the applicant. Second, the guidelines prohibit issuance of a permit if the discharge would cause or contribute to significant degradation of waters of the United States.

To demonstrate compliance with the CWA Section 404(b)(1) guidelines, the applicant must provide a complete and detailed alternatives analysis that fully considers a range of alternatives with the goal of avoiding, and where unavoidable, minimizing aquatic impacts. This includes but is not limited to consideration of alternative routes for the project, including alternative border crossing locations, as well as alternative installation methods, such as full or partial underground installation of the transmission lines. It is premature and difficult for us to offer informed comments on the project under NEPA and regarding the selection of the LEDPA without this information.

Alternatives to the proposed action that would cause less impact to the aquatic ecosystem have not been fully explored. For example, approximately 54 miles of the proposed alternative, identified as Segment 1, is proposed on a new alignment between the Canadian border and the Forks. Substantial aquatic impacts and fragmentation of forest resources would occur in this segment. Direct and secondary impacts to many streams and wetlands could be avoided and minimized by practicable alternative project designs including, amongst other design features, modification of the proposed route and underground installation of transmission lines. We recommend that these measures be fully explored.

We recommend that specific routing alternatives be considered, including underground routing along existing local, state and/or federal roadway or railway corridors, or along other existing previously disturbed linear corridors, including logging roads, as well as underground routes along the proposed corridor on new alignment (with minimized vegetation clearing) between the Canadian border and the Forks, or other new alignment corridors. Hybrid combinations of alternatives (e.g., an alternate border crossing location with a shorter segment on new alignment connecting to a roadway corridor, or other combinations) should also be fully considered. Alternatives that include widening of existing transmission corridors, including alternatives combining underground routes for segments leading to those corridors, must also include measures to avoid and minimize adverse impacts, including but not limited to conversion of forested wetlands to other wetland types, and alteration or loss of riparian habitat.

Underground installation of transmission lines, especially if located adjacent to or within existing roadway, railway or other previously disturbed linear corridors, would typically result in less adverse impact to the aquatic ecosystem, and to the adjacent supporting terrestrial habitat. This is especially true when one compares the potential impacts of underground installation to the potential impacts of aerial installation in project segments proposed on new alignment. Construction, operation and maintenance of a project on new alignment would cause major disruptions to the forest matrix, resulting in extensive adverse impacts to aquatic resources and supporting habitat.

In addition, we note that similar project proposals in New England have incorporated underground installation of HVDC transmission lines over significant distances. In one instance, the 154-mile Vermont Clean Power Link project is proposed entirely underground, within existing roadway corridors and the Lake Champlain lake bed. The practicability of this design approach is supported by the USACE CWA Section 404 permit for the project issued in January 2016.

The alternatives analysis must include a description of how the location of the proposed Canadian border crossing was selected, and if other locations were considered. The alternatives analysis must determine whether modifications to the crossing location would potentially reduce impacts to the aquatic ecosystem or facilitate less damaging alternative routes, such as along road or rail corridors.¹

The alternatives analysis should address the practicability of alternatives in light of cost, existing technology, and logistics. Cost is a legitimate consideration in the alternatives analysis. However, increased costs do not necessarily render an alternative impracticable. The alternatives analysis should present adequate information on costs of alternatives relative to overall project costs to justify rejection of any of the alternatives based on economics. We also note that any higher construction costs associated with potentially less environmentally damaging alternatives (such as underground alternatives) would be at least partially offset by a reduction in compensatory mitigation costs related to reduced project impacts.

Mitigation - 40 CFR 230.10(d)

For a proposed project to comply with 40 CFR 230.10(d) of the CWA Section 404(b)(1) guidelines, impacts to waters of the U.S. must be avoided and minimized to the extent practicable and all appropriate and practicable steps must be taken to compensate for unavoidable impacts. The appropriate sequence for mitigating project impacts are to first avoid, and where unavoidable, minimize direct and secondary impacts to the aquatic ecosystem. The remaining unavoidable, minimized direct and secondary impacts must then be offset through compensatory mitigation.

¹ We note that, on page 47 of the pre-filed testimony (2/28/19), CMP states that they did not consider underground installation or alternative locations for the border crossing.

It is EPA's understanding that a compensatory mitigation plan for the proposed project has been under development for some time. We did not have the opportunity to assist the USACE and the applicant with devising the conceptual mitigation plan. EPA believes that while the development of a conceptual mitigation plan for the proposed project is appropriate, it is premature to develop a specific, detailed compensatory mitigation plan prior to the completion of a thorough alternatives analysis to assure compliance with the CWA Section 404(b)(1) guidelines and to support a LEDPA determination. As noted earlier, under the CWA Section 404(b)(1) guidelines, because the project is not water dependent and involves fill in wetlands and other special aquatic sites, practicable, less environmentally damaging alternatives are presumed to exist. It is the applicant's responsibility to demonstrate that there is no less damaging practicable alternative to the proposed project, and that the proposed project represents the LEDPA. If a less environmentally damaging practicable alternative does in fact exist, the associated compensatory mitigation plan should be designed to offset the impacts of that alternative.

From our limited review of the proposed compensatory mitigation plan, with some exceptions, it appears that the plan is conceptually sound, being generally comprised of a combination of compensation through land preservation and monetary contributions to Maine's ILF program. However, the mitigation plan appears to be incomplete with respect to compensation for secondary impacts to streams and lacks adequate information on the threat of development of the proposed preservation parcels.

The proposed project would result in the removal of over 11 linear miles of riparian vegetation along streams and brooks. Some of that loss requires mitigation under MEDEP and MDIFW rules. However, the USACE also has mitigation guidance for secondary impacts to streams (see page 60 of the 2016 USACE Compensatory Mitigation Guidance document). In addition to meeting state mitigation requirements, the compensatory mitigation plan should also comport with the USACE Compensatory Mitigation Guidance.

Also, because the value of preservation as compensatory mitigation is linked to the prevention of loss or impairment of the ecological functions and services of the preserved parcel, more detail should be provided on the level of threat of development or other potential loss or impairment of the ecological functions and services of proposed preservation parcels. In addition, more information on the appropriateness of particular preservation measures to offset the impairment or loss of specific habitat or ecological functions and services is needed. For example, preservation of riparian corridors to offset impacts to specific habitat types (e.g., coldwater fisheries) must target in-kind (e.g., coldwater fisheries) rather than of out-of-kind (e.g., warmwater fisheries) riparian habitat.

Recommendations for Further Review

EPA remains willing to continue to work with the USACE and the applicant during the review of the project and think an interagency meeting with the applicant in the near future would be helpful. We request the opportunity to review a draft of the USACE Environmental Assessment for the project and look forward to reviewing a revised

project application with supporting information, including a complete alternatives analysis and the additional information requested above. We reserve the right to provide additional comments based on our ongoing review and as new information is provided. Thank you for your careful consideration of our comments. If you have any further questions, please call Mark Kern (617-918-1589) or Michael Marsh (617-918-1556) of my staff.

Sincerely,



Beth Alafat, Acting Chief
Wetlands Protection Unit

cc: Lindsey Lefebvre, USACE (electronically)
Jay Clement, USACE (electronically)
Mark Bergeron, Maine DEP (electronically)

From: [Catherine Casavant](#)
To: [Clement, Jay L CIV USARMY CENAE \(USA\)](#); [Beyer, Jim R](#); [Martin, Thomas](#); [Hinkel, Bill](#); MCasavant@eabinistries.com
Subject: RE: Catherine Casavant sent you "Beyer Letter"
Date: Tuesday, November 26, 2019 9:58:45 AM
Attachments: [image007854.png](#)
[image780722.png](#)

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am planning to attend that public hearing weather permitting -- I live in New Jersey and am reluctant to undertake the trip in inclement weather.

Catherine Casavant
Of Counsel



40 Exchange Place, 20th Floor
New York, NY, 10005

Direct: 212-485-9941
Cell: 917-856-9048
Main: 212-485-9600
Email: ccasavant@kdvlaw.com

WWW.KDVLAW.COM



[NEW YORK](#) | [NEW JERSEY](#) | [PENNSYLVANIA](#) | [FLORIDA](#) | [ILLINOIS](#) | [CALIFORNIA](#)

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient(s) is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

 Please consider the environment before printing.

-----Original Message-----

From: Clement, Jay L CIV USARMY CENAE (USA) <Jay.L.Clement@usace.army.mil>
Sent: Tuesday, November 26, 2019 9:54 AM
To: Catherine Casavant <ccasavant@kdvlaw.com>; Jim.R.Beyer@Maine.gov; Thomas.Martin@legislature.maine.gov; Bill.Hinkel@maine.gov; MCasavant@eabinistries.com
Subject: RE: Catherine Casavant sent you "Beyer Letter"

Ms. Casavant:

Thank you for including me in your email to Mr. Beyer and conveying your comments regarding the proposal by Central Maine Power Company to construct and maintain an aerial electrical transmission line between Beattie Township and Lewiston, Maine.

We will forward your comments to the applicant who may contact you directly in an effort to resolve your concerns. We have made your comments part of the official file and they will be considered, along with all other comments received, in determining what permit action is in the public interest.

Please also be advised that although the state public hearings in this matter have already occurred, the Corps of Engineers will be holding a hearing on December 5, 2019 at 4:00 at the Ramada Inn at Lewiston, Maine. A copy of the public notice announcing the details of the hearing is attached. Please attend if you are able.

If you have any questions concerning this matter, please contact me at 207-623-8367 at our Augusta, Maine Project Office.

Sincerely,

Jay L. Clement
Senior Project Manager
US Army Corps of Engineers
Maine Project Office

-----Original Message-----

From: Catherine Casavant [mailto:ccasavant@kdvlaw.com]
Sent: Tuesday, November 26, 2019 9:10 AM
To: Jim.R.Beyer@Maine.gov; Clement, Jay L CIV USARMY CENAE (USA) <Jay.L.Clement@usace.army.mil>; Thomas.Martin@legislature.maine.gov; Bill.Hinkel@maine.gov; MCasavant@eabministries.com
Subject: [Non-DoD Source] Catherine Casavant sent you "Beyer Letter"

Please see the attached on behalf of the Dominique P. Casavant Irrevocable Trust.

CONFIDENTIALITY NOTICE: This electronic message is intended to be viewed only by the individual or entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this communication is strictly prohibited without our prior permission. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or if you have received this communication in error, please notify us immediately by return e-mail and delete the original message and any copies of it from your computer system.

Catherine Casavant
Of Counsel

40 Exchange Place, 20th Floor
New York , NY , 10005
Direct: 212-485-9941
Cell: 917-856-9048 <tel:917-856-9048>
Main: 212-485-9600 <tel:212-485-9600>

Email: ccasavant@kdvlaw.com <Blocked<http://ccasavant@kdvlaw.com/>>

BlockedWWW.KDVLAW.COM <Blocked<http://www.kdvlaw.com/>>
<Blocked<http://www.kdvlaw.com/>> <Blocked<https://twitter.com/KDVLawLLP>>
<Blocked<https://www.linkedin.com/company/kaufman-dolowich-&-voluck-llp/>>
NEW YORK | NEW JERSEY | PENNSYLVANIA | FLORIDA | ILLINOIS | CALIFORNIA

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient(s) is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.
P Please consider the environment before printing.

From: [Rollie Brown](#)
To: [Hinkel, Bill](#)
Subject: NECEC Project, Merrill Strip Plan
Date: Tuesday, November 26, 2019 10:07:34 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Maine Regulators:

As a 72 year old lifelong Mainer, Master Maine Guide and enthusiastic supporter of the NECEC Project I'm writing to support the Merrill Strip plan, which is an amendment to the original NECEC application. The Merrill Strip plan follows a short distance thru Merrill Strip (about 1 mile) as compared to the original 1.4 miles Beattie Pond route. As was the case the first time around, this route involves 150' strip over privately owned land that has been commercially cut forest for many years. It is not pristine and it offers fewer environmental impacts.

So I respectfully urge you to support this amendment and request that you look favorably on this project which in my humble opinion will have a very positive impact on Maine's wildlife, in addition to its citizens of which I am so grateful to say, "I'm one". And, as I see it, the benefits will also extend to tourists and Mainers who enjoy hiking, taking photographs, cross country skiing, snowmobiling, not to mention white water rafting and enjoying areas of our great State that would likely not be available to them if not for the generous, open to the public policies of Maine's electric companies and other private landowners who provide the access roads, trails, boat launches, picnic areas and who contribute in so many other ways to our wonderful Maine experience.

Thank you for your consideration and time.

Rollie Brown

From: [Christopher Ayres](#)
To: [Hinkel, Bill](#)
Subject: NECEC Re Merrill Strip Reroute
Date: Monday, November 25, 2019 4:14:16 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Bill Hinkel,

Please approve the Merrill Strip alternative. It has fewer environmental and visual impacts than the Beattie Pond route.

It represents an intelligent but very minor change to a very important project that we need to begin to deal with the climate crisis in Maine and the region.

The amended route (as does the main route) goes through commercial industrial forest that has many woods roads and yards and clear cuts as well as state roads, wind turbines and transmission lines and a railroad.

We face existential climate change. This project is essential. It makes sense.

Please approve!

Christopher Ayres

From: [Wendy Mae Chambers](#)
To: [Hinkel, Bill](#)
Subject: please add my comment re NECEC Beattie Pond detour
Date: Thursday, November 21, 2019 5:03:48 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Bill,

Please add my comments.

Thanks,
Wendy

Many trees will be destroyed as result of this project which includes the Beattie Pond detour.

- U.S. Forest Service: on average, 1 acre of Maine forest land is estimated to absorb approximately 700 tons of CO₂-equivalent annually (and the forest clearing from Segment 1 of the proposed NECEC corridor is approximately 1,000 acres

Preserving trees and planting new trees is vital to combat climate change as trees sequester CO₂ from the atmosphere. They also provide important habitat and shade.

Not all renewable energy projects are created equal. This one is most onerous with its rampant destruction of the pristine Maine woods.

We are now at a watershed moment. Great care must be given and controls created to preserve and nurture the natural environment as we convert to renewable energy.

Please protect the Maine woods. We are all counting on you.

Sincerely,

Wendy Mae Chambers, PO BOX 12, Jackman, ME 04945

609-661-4083, wendymae@comcast.net

RECEIVED
NOV 25 2019
LUPC - AUGUSTA

Municipality of Coplin Plantation
5 Currie Street
PO Box 319
Coplin Plantation, ME 04982
246-5141

November 19, 2019

Maine Land Use Commission
22 State House Station
Augusta, ME 04333

To Whom It May Concern:

On November 5, 2019 Coplin Plantation held a referendum vote, by secret ballot, on the proposed New England Clean Energy Connect transmission line project. The referendum read as follows:

To see whether the residents of Coplin Plantation, Maine will vote to take a position on the construction of the New England Clean Energy Connect (NECEC) transmission line project through the state of Maine as proposed by Central Maine Power (CMP).

We had 32 voters. The results are as follows: 5 YES 26 NO 1 BLANK

Please take into consideration these results when voting on the above mentioned project.

Thank You,



Donna M. Pelletier
Municipal Clerk
Coplin Plantation

Lillian Sears
211 Macomber Hill Road
Jay, Maine 04239

RECEIVED
NOV 15 2019
LUPC - AUGUSTA

Nov 12, 2019

William Hinkel
LURC
22, State House Station
Augusta, Me 04330

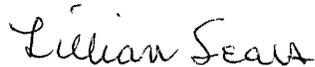
Dear Bill;

I am a resident of Jay, Maine and I support the clean energy project being paid for by Massachusetts as I am a firm believer in clean energy that will flow from Canada into Lewiston and offer Maine and many communities with numerous benefits. Even though the project is being paid for by another state, it doesn't mean that Maine won't get the benefit of the clean power. We will.

I know that there was a recent change to the project up in the northern part of Franklin County. 1.4 miles in Beattie has been switched for 1 mile in Merrill Strip. This is a shorter route and in my mind, an acceptable change to the project.

I hope you will not slow up your approval process due to this change. It is a minor change but offers additional environmental benefits. Thanks for your time.

Sincerely yours,



Lillian Sears

**Duane Burbank
211 Macomber Hill Road
Jay, Maine 04239**

**RECEIVED
NOV 15 2019
LUPC - AUGUSTA**

Nov 12, 2019

**William Hinkel
LURC
22 State House Station
Augusta, Me 04330**

Dear Bill;

I've been following the New England Clean Energy Connect project, and even though some people in our town took over the normal process, and asked our town to oppose the project, I support it.

I support it because we need the added tax revenue and economic impacts. More jobs and more clean power that Maine is capture are good for our economy.

I also support the change in the project up in Merrill Strip. I see no reason why this change in the route should slow down the review process. It's shorter and as I can see, it's an improvement, although the earlier route was fine too.

Sincerely yours,

Duane Burbank

A handwritten signature in cursive script that reads "Duane Burbank".

RECEIVED
NOV 15 2019
LUPC - AUGUSTA

Judy Diaz
194 Macomber Hill Road
Jay, Maine 04239

November 12, 2019

Mr. William Hinkel
LURC
22 State House Station
Augusta, Maine 04330

RE:NECEC-Revised alternate route outside the Subdistrict at Beattie Pond

Dear Mr. Hinkel;

I am a Jay resident and property owner near the corridor. As you review the application for the New England Clean Energy Connect, and extend the public comment time frame so that we might weigh in on the application's change, I wish to let you know that I am 100% convinced that this project is good for our environment and our economy.

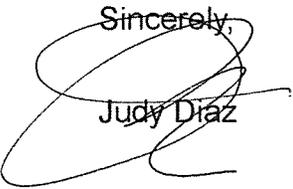
The change that the project recently incorporated includes a very small area up in northern Franklin County. Rather than following along 1.4 miles near Beattie Pond, the route is now proposed to follow about 1 mile of the Merrill Strip. I believe this change was initiated by the regulatory agencies expressing some concern, and the applicant complied with the request.

While the Beattie Pond segment had very few impacts, and stood on its own, perhaps this change is for the better, when it comes to being less impactful. It is not in an LUPC protection subdistrict and it is less visible to recreationalists.

I would like you to conclude that the project is in the best interest of Maine and New England. With all of the reports very recently about the harmful effects of warming waters on our lobster industry, and the rising sea level that will wipe out coastal areas, a project such as this one goes a long way in offering a part of the big solution. I would be remiss in not reiterating the economic impact it will bring to this area of Western Maine.

Thank you for your thoughtful review.

Sincerely,


Judy Diaz