



# SIERRA CLUB

MAINE CHAPTER

PO Box 3760  
Portland, ME 04104

To: Dawn Howell, Director, Southern Maine Regional Office, Maine DEP  
From: Sierra Club Maine  
Date: June 13, 2025  
Re: New England Clean Energy Connect (NECEC) Conservation Plan ("Plan") submitted by NECEC Transmission LLC ("NECEC LLC") to the Maine Department of Environmental Protection (DEP) on May 9, 2025.

Dear Ms Howell,

Thank you for the opportunity to comment on the NECEC Conservation plan as required by the permitting process and the following conditions: Condition #39 of the DEP Order and Condition #10 of the BEP Order. Sierra Club Maine represents 22,000 members and supporters in Maine, many of whom have been and will be impacted by NECEC.

Sierra Club Maine (SCME) strongly supports the comments provided by Matt Streeter of Maine Council of Trout Unlimited, Eliza Townsend of Appalachian Mountain Club, Pete Didisheim of Natural Resource Council of Maine, and Sally Stockwell of Maine Audubon. While SCME did not participate in the actions with Maine DEP during the permitting process, we continue to be party to litigation regarding permitting by Army Corps of Engineers and US Department of Energy over the same matter.

The essence of our comment is that the fragmentation and damage to existing mature forested and forested wetland habitat in the NECEC parcel has been inadequately mitigated in the proposed conservation plan.

- 1. Inadequate Compensation for Mature Forest Habitat and Fragmentation Impacts.** The Conservation Plan's proposed mitigation is inadequate to genuinely compensate for the immediate and ongoing fragmenting effect and damage to existing mature forested and forested wetland habitat, as required by Conditions #39 and #10. The Orders emphasize "compensation for the fragmenting effect" and "conservation of mature forest areas". Yet the plan acknowledges that commercial forest management activities, including timber harvesting, are allowed on the conserved property consistent with the Mature Forest Goal, indicating that the property will remain a "dynamic landscape at different stages of growth, ages, and composition". This continued harvesting, even with long-term goals, does not provide the immediate, intact, and undisturbed mature forest habitat critical for species like the pine marten (an umbrella species) that require "tree to tree movement" and avoid "large forest openings". **The plan's proposed management, which involves achieving mature forest by 2065, does not sufficiently provide the "ecosystem wide services" that an intact, unharvested mature forest would**

**offer as direct compensation for the habitat value lost or compromised by the project's fragmentation.**

**2. Inclusion of Already Fragmented or Impacted Lands Undermines**

**Compensatory Purpose.** The inclusion of the NECEC corridor itself and other already fragmented areas, such as portions near Route 201, within the 50,000-acre conservation area fails to provide adequate new or net compensatory habitat as explicitly required by Conditions #39 and #10. Condition #39 specifies "additional, off-site, mitigation" to "offset" project impacts. The NECEC corridor (Segment 1), which runs for approximately 53.1 miles through western Maine, is specifically cited as the fragmenting feature for which compensation is required. **The intent of the conservation is "compensation for the fragmenting effect"; including areas that are themselves part of the fragmentation or already significantly impacted diminishes the genuine additional value that the conditions aim to achieve.**

**3. Climate Impact and Immature Forest Management Compromise Habitat**

**Compensation Goal.** While the overall NECEC project was approved in part due to its stated reductions in greenhouse gas (GHG) emissions, the Conservation Plan's specific mandate under Conditions #39 and #10 is to compensate for habitat fragmentation by "promoting habitat connectivity and conservation of mature forest areas". Truly mature forests offer superior structural complexity, micro-climates, and long-term stability essential for many forest interior species and overall habitat resilience, thereby making them a more effective compensatory habitat as mandated by the conditions for "mature forest areas". The existing landscape traversed by Segment 1 is described as "intensively managed commercial timberland" and a "mosaic of various aged forests", and the Sierra Club Maine has previously highlighted concerns about the project's large-scale fragmentation impact on this ecologically significant and biodiverse region. **The plan's trajectory towards mature forest, while a stated improvement, may not align with the immediate and high-quality habitat compensation needed to truly offset the project's impacts under the terms of the Orders.**

**4. Insufficient Analysis of Riparian Impacts. Finally, this plan fails to address the net impact to riparian ecological services.** Despite direct impacts of the project to forested wetlands along the corridor, many of these areas are carved out from the proposed conservation acreage. The impacts to these lands have even greater net impacts both locally and downstream than fragmentation. These effects are not accounted for adequately in this plan.

Again, thank you for offering the opportunity to comment. **We hope that you will send this plan back for revision.**

Sincerely,

Becky Bartovics, former Executive Committee Member  
Philip Mathieu, Conservation Chair  
Sierra Club Maine