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 June 12, 2026

Ms. Dawn Hallowell

Maine Department of Environmental Protection

Bureau of Land Resources

17 State House Station

Augusta, Maine O4333-0017

 **Sent by email**

Re: Conservation plan and CE for NECEC Powerline

Dear Ms. Hallowell:

I wish to compliment the DEP on this extraordinary plan. This is true in view of the rigor and thoroughness of the conformance with the original approval order. I served as Director of the Bureau of Public Lands in the mid 80’s and began the earliest formalized silviculture after the first period of consolidation into larger tracts was complete. I have gone on to write five books on forestry.

It would help me, as a forester, to be able to evaluate the management plan, which is to be available next month. But reading from what is submitted, this plan steps into unmapped territory, especially in prediction of tree height and stand structure thirty-five years into the future, potentially three cutting cycles. It is also exceptional for Maine, where the emphasis seems to be on growing trees on shorter rotations. All the same, if there is economic merit in this prescription, there are a few other private landowners which will view it with considerable interest, in view of the virtual vanishing of the pulpwood market and the modest payments for woods-run spruce-fir of small size. It even reminds me of a long-ago recommendationof minethat the state purchase “land management rights” in the headwaters of the St. John for the very same purposes as here.

It strikes me that, having worked around the West and South in the past, Weyerhaeuser knows a bit about intensive management of conifers and would be my pick to manage on long rotations. Finally, this easement foresees major change in the landscape over a very long period of time - forever. Yet, a ten- year, or 35 - year management Plan is brief when compared with Carbon Forest management plans that are routinely considered today.

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