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Ms. Dawn Hallowell  
Director, Southern Maine Regional Office  
Maine Department of Environmental Protection  
312 Canco Rd,  
Portland, ME 04103

October 31, 2025

RE: NECEC Conservation Plan – Supplemental Comments on LSOG forest and harvest plans

Dear Ms. Hallowell:

This letter is a follow-up to my comments submitted to you on June 12, 2025, regarding the NECEC Conservation Plan. Now that the Forest Management Plan for the easement is public, I was able to evaluate the impact of the harvest plan on predicted late-successional and old-growth (LSOG) forest in the easement area, as included herein. I hope these comments help you in your ongoing assessment.

Overlaying the 2025-2037 harvest block boundaries onto the LSOG map included in my June 12 comments (Figure 1), I estimate that 198 hectares (489 acres) of LSOG forest will be modified or lost (Table 1), depending on the harvest method. That figure amounts to 25% of the existing LSOG forest in the easement area today. Most of this is “Transitioning LS,” which is often economically mature or “overmature,” but has the potential of becoming high-ecological-quality late-successional forest in 25-50 years, if left unharvested.

Given the goal of the NECEC easement is to conserve mature forest, it seems that harvesting any of the small amount of LSOG forest in the easement area that remains today would be counter to that goal. As documented in my June 12 comments, the easement area is already well below the average LSOG area for the unorganized territories of Maine. Harvesting these areas will make it worse.

There are many forest management strategies Weyerhaeuser could employ to retain the ecological value of these LSOG parcels, including set-asides, patch retention, and single-tree selection. Regardless of the practices employed, these identified LSOG areas should be treated with care if mature forest characteristics are a goal of the easement.

Keep in mind that my assessment of the impact on LSOG forest is only an estimate because our LSOG forest classification model is not perfect. However, the model has been ground-truthed in the unorganized townships of Maine and proven to be over 90% correct in identifying LSOG forest.<sup>1</sup>

Ground validation of the LSOG classification model can be easily determined using Our Climate Common’s field-based LSOG Rapid Assessment Protocol.<sup>2</sup> Perhaps Weyerhaeuser could screen all the LSOG parcels using this tool before harvest. I provided Weyerhaeuser with the electronic LSOG map for their ownership in June 2024, as they helped fund our LSOG mapping work through the Cooperative Forestry Research Unit at

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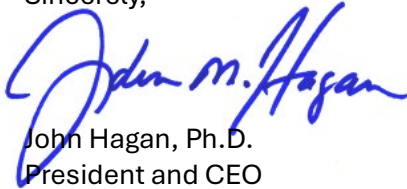
<sup>1</sup> Hagan, J., B. Shamgochian, M. Taylor, and M. Reed. 2024. Using LiDAR to Map, Quantify, and Conserve Late-successional Forest in Maine. Our Climate Common Report, Georgetown, Maine. 44 pp. ([link](#))

<sup>2</sup> Shamgochian, B., J. Hagan, M. Taylor, and M. Reed. 2025. LSOG Rapid Assessment Protocol (RAP) for Maine (v2.0). Our Climate Common Report, Georgetown, Maine. 36 pp. ([link](#))

the University of Maine. That is, they are already familiar with the LSOG map and may have their own good ideas for LSOG conservation in the easement area.

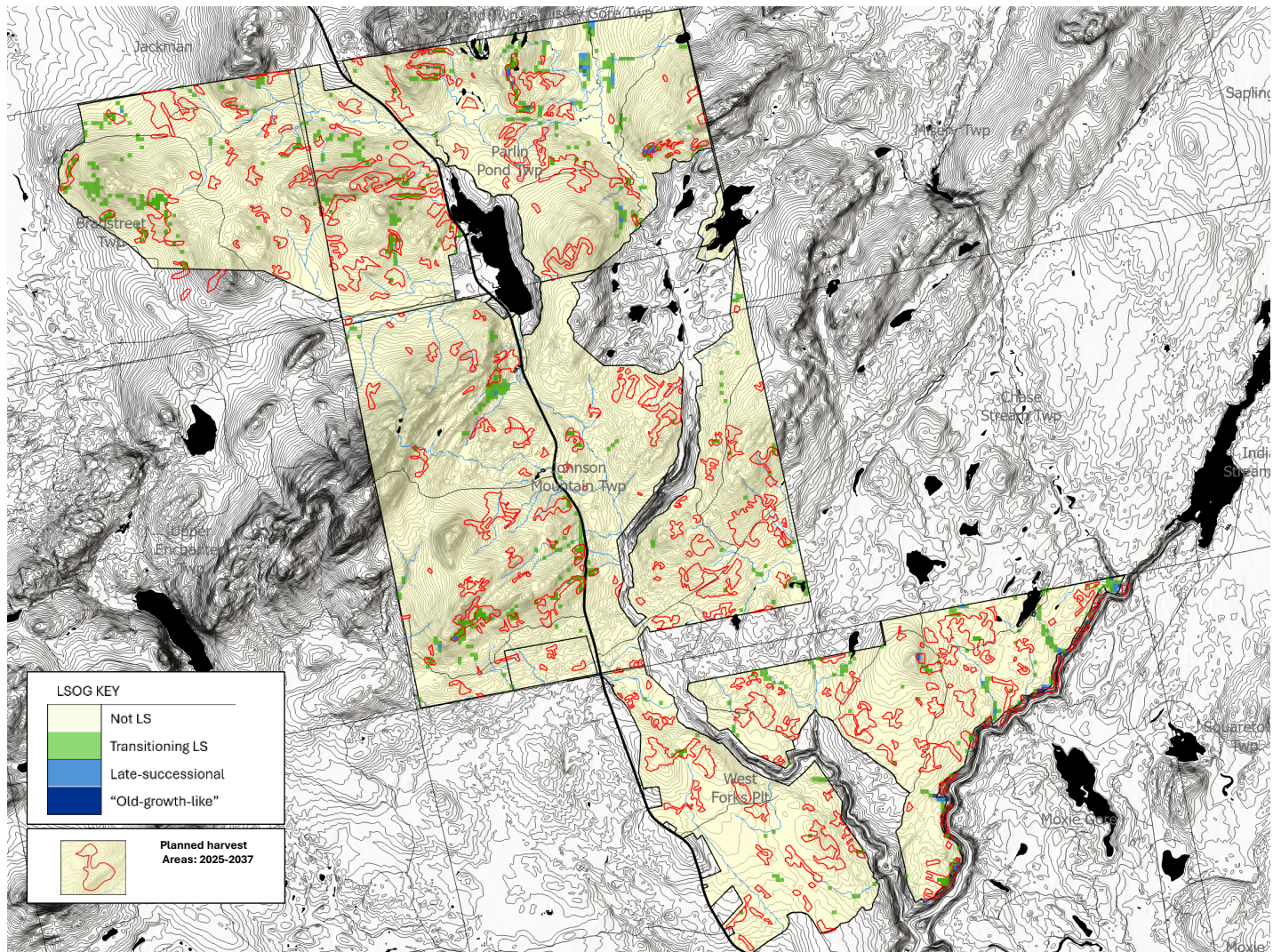
Thank you for considering these additional comments.

Sincerely,



John Hagan, Ph.D.  
President and CEO  
Our Climate Common

**Figure 1. LSOG map for proposed NECEC conservation easement, including planned harvest areas 2025-2037.**



**Table 1. Current LSOG area in proposed NECEC easement in comparison to future LSOG area after proposed harvest.**

|       |                   | Current Condition      |                                   | Future Predicted Condition                    |                                  |                                           |
|-------|-------------------|------------------------|-----------------------------------|-----------------------------------------------|----------------------------------|-------------------------------------------|
|       | LSOG Class        | Area (ha) <sup>1</sup> | Percent of Landscape <sup>2</sup> | Estimated LSOG Lost to Harvest 2025-2037 (ha) | Estimated LSOG Area in 2037 (ha) | Percent of Landscape in 2037 <sup>2</sup> |
| 1     | Not LS            | 18,063                 | 95.8%                             | --                                            | 18,261                           | 96.9%                                     |
| 2     | Transitioning LS  | 737                    | 3.9%                              | 185                                           | 552                              | 2.9%                                      |
| 3     | Late-successional | 42                     | 0.2%                              | 11                                            | 31                               | 0.2%                                      |
| 4     | "Old-growth like" | 8                      | 0.0%                              | 2                                             | 6                                | 0.0%                                      |
| TOTAL |                   | 18,850                 | 100%                              | 198                                           | 18,850                           | 100%                                      |

<sup>1</sup> Land hectares below 2700' in elevation

<sup>2</sup> Percent of total land hectares analyzed.

[end]