

March 31, 2019

TO: Maine Department of Environmental Protection
FROM: Gail Lange PhD

I am opposed to the NECEC project. I would like to make the following points to you concerning the NECEC project.

- **Costs and Benefits.** Models used by proponents of the NECEC project estimate the cost and benefits following a standard business model. However, “natural capital” has not been brought into the argument. **This is a major omission.** Studies have shown that the cheapest and best way to reduce carbon emission is by protecting forests. Over the last twenty years, people have worked on quantifying the value of non-market goods and services provided by forests annually: this is called natural capital. The currency of natural capital includes carbon sequestration, flood control, water filtration and purification, pollinator habitat, nutrient recycling, soil erosion prevention, air filtration, shade and cooling, and soil formation. About half of the natural capital value of forests are related to carbon sequestration and storage in trees and soils. I note that the March 29 report from the staff of the PUC left blank the field for this “natural capital”. See page 4 of their report for the item they entitled “Regional Environment and Local Community Impacts”; there is no dollar amount for this field.

The newest “deal” has CMP promising Maine \$258,000,000 over 40 years. CMP has over 600,000 customers according to their web site. This means $\$258,000,000/600,000 = \430 per customer over 40 years. This means $\$430/40 = \10.75 per customer per year for 40 years. This is a pittance. The present value of course is less.

- Studies cited up to this point do not address the totality of the claims of carbon emissions. There is a bill in the legislature (LD 640) sponsored by Senator Carson to ask the DEP to conduct an independent investigation of CMP’s claims that the new line would have benefits for the climate through reduced greenhouse gas emissions. I strongly support this bill.

Two regional, environmental groups, the Conservation Law Foundation and the Acadia Center, say there is reason to believe that the project will result in new carbon dioxide savings. London Economics says this new line will reduce carbon emissions in the region by 3.6 million metric tons each year.

However, opponents including Senator Carson have said that backers of the Northern Pass Project in New Hampshire made similar reduction claims but regulators there could never verify them. I realize CMP has stated there have already been three analyses of the NECEC project, all of which concluded the reduction in 3 million metric tons of carbon emissions per year. However, it is unclear if Hydro-Quebec (already providing power to up-state New York and to Vermont) has the generational capacity to also provide Massachusetts so that fossil-fuel generators are not needed. Both CMP and Hydro-Quebec have been asked if they need more power, what will they do. They have not answered. Thus, we need the independent study called for in LD 640. It is noted that Hydro-Quebec has refused to participate in the regulatory proceedings in Maine (just like in NH). If this study asked for by LD 640 cannot be carried out since for example Hydro-Quebec cannot be forced to participate, Maine should reject the NECEC project (as NH did).

- **More On Greenhouse gas.** The proposed power line is older technology. Hydro power to Massachusetts will be delivered but most likely not all non greenhouse sources. The proposed line could have used modern burial technology. The line could have been located other places, perhaps along the logging roads in part. (I realize CMP owns the area where NECEC will go.) Wind, solar, efficient use of electricity via geothermal and heat pumps. For example, I have installed a geothermal well at my home. According to a senior advisor to Energyzt, Hydro-Quebec could supply energy through this new power line by reducing its exports into other markets or by purchasing energy from other markets during low-priced hours in order to sell it to Massachusetts under the higher contract price. Both strategies could increase carbon emissions in other markets.

We need to make intelligent decisions to mitigate more extreme impacts of climate change and invest in efficient strategies, not this transmission line.

- **Destroying working beautiful forest:** the forest that CMP is proposing to go through is a special undeveloped area (not pristine by any means, but undeveloped), one of the largest in the eastern U.S. The Maine Mountains region is part of the largest contiguous expanse of undeveloped forest in the eastern United States. It provides ecological connectivity and climate change resilience. It is a globally important bird area. This new corridor would cause a large fragmentation of this lovely forest. The line will remove habitat and will disrupt movement of less mobile species requiring intact forest.

Nature Conservancy scientist Andy Cutko says the new CMP line would provide a foothold for invasive plants; the north woods are a sheltered oasis for a diversity of native plants and animals. He says unabbreviated forestland can deter predators such as fox and raccoon and provide security for more specialized species, such as pine marten or wood thrush, that do not easily adapt to open areas or new environmental circumstances.

- **Tourism in Western Maine:** the proposed line will be quite detrimental to building tourism in the area now and over time including 40 years into the future.

- **Impact on me personally:** I am a resident of Industry Maine (65 Shaw Hill Road) and own my home. My land is adjacent to where the proposed new CMP corridor will be built (500 ft. behind my land). Currently there are over 50 year old beautiful red pines both on my land and CMP’s. In my area, we enjoy the forest for its wildlife (birds, deer, moose) and our activities: snowshoeing and cross country skiing; hunting; fishing.

Please do not support the NECEC project.