April 3, 2019

I am writing this letter regarding the proposed CMP Corridor (NECEC). The NECEC is a charged political issue with a large majority of people in Maine opposing the construction of the corridor and HVDC line.

The NECEC is a very emotional issue and the public hearings have been a forum where many people simply state that this should not happen because of obvious reasons ranging from the potential impact on the beauty of Maine to the potential reduction in tourism as a result of these unsightly overhead power lines, 300 foot wide right of way, and the little discussed issue of EMR from the HVDC line.

However, in this letter, I would like to try to highlight facts and important issues that have not really been thoroughly discussed. I will be as brief as possible to present my argument.

I would like to go on record stating that I, Richard W. Aishton of Farmington, Maine, oppose the construction of the NECEC.

Issues and Questions:

- I have heard CMP discuss the fact that because there is a contract between Hydro-Quebec (HQ) and Massachusetts (MA) and the fact that Maine bears no cost in the construction of NECEC then, essentially they ask: "why is there a real problem?" CMP considers that Maine is not really a party to this project because it won't cost anything. I want to ask about the environmental costs associated with this project? As an environment dynamics specialist I can confidently state that this corridor will be an ecological disaster and the fact that CMP has tacitly addressed this issue, but has no inclination to expand on its sophomoric explanation because I am sure they realize that the environmental damage is significant. Where is the cost estimate for what Mainers will bear regarding environmental damage? I would like to see this document and assessment and would like to know **who** prepared it. Whatever happened to Environmental Impact Assessments or something similar? This project needs one badly.
- The corridor will cause ~3500 acres of land to be clear cut and this represents approximately 35,000 cords of wood harvested. Imagine the carbon sequestered that would now be lost forever? The fuel required to harvest and move off site from that much acreage is staggering.
- The corridor itself: the suppression of vegetation along the corridor requires herbicides. The long-term damage to humans and to the ecosystem is serious and difficult/impossible to mitigate. I have seen nothing from CMP regarding specifics on this issue. Again, they probably do not want to be required to discuss this issue because it would again show how disastrous this corridor

really is. Are the reports that CMP prepared (or will prepare) available to the public? They should be.

- Why isn't some type of independent assessment of a project this invasive required? Title 35-A covers this requirement but CMP claims it is not applicable because Maine bears no cost. Again, how about the cost of the damage to the environment?
- HVDC lines are normally buried. In his testimony on April 2, 2019, Mr. Russo clearly stated that he was surprised that an HVDC line this long wasn't buried. This man is an **expert.** CMP countered with two examples: Africa and Nova Scotia where HVDC lines similar or longer were above ground. Nova Scotia, according to Mr. Russo (and admitted by CMP) is largely under water. The other example was in Africa and there may be a very plausible reason for that particular line no one mentioned anything. Originally, CMP submitted or considered submitting a proposal to MA with the line buried but knew it would be too costly. So, we are now discussing what amounts to "Plan B" because Plan A was potentially too expensive?
- There are alternatives (NTAs) but no one has addressed this yet. The New York route could be a potential route by expanding their capacity and an existing underground conduit in Maine to Portland is another possibility. CMP will claim it's too expensive but can they be believed at this point? They are under investigation for cheating rate payers.
- CMP promises Maine \$258 million over 40 years to 'sweeten' the deal roughly \$6.5 million/year for Maine at today's rates. Doing the math shows that Maine rate payers will receive approximately \$0.40 per month in benefit. Is that really a fair deal? This is while HQ receives \$41 million per **month** profit and CMP receive \$5 million profit per **month**.
- During the hearing on April 3, 2019, I also had the opportunity to hear from people representing Western Mountains & Rivers Corporation (WM&RC). One person was pinned down regarding a statement he made at a town meeting. He responded by saying that he was speaking at that meeting as a private citizen and not a representative of WM&RC. If he did not state at that meeting that he was speaking as a private citizen then anything he says can also be directly applied to his affiliation with WM&RC. I would also state here that it really does seem quite coincidental that WM&RC was formed 6 months prior to the first NECEC discussions and also guite a nice coincident that WM&RC have received \$250,000 from CMP to 'carry out their organizational mission' and will receive an additional \$50,000 per year for 5 years from CMP. Are we really going to believe that all of these coincidences don't teeter on ethical boundaries, if not moving onto the other side of ethical practices? Moreover, we also do know that Mr. Peter Mills is on the Board of Directors of WM&RC. He's a Maine State employee, brother of the governor, and is directly linked to an organization that will receive \$500,000 from CMP. Think about these coincidences? Can we really ignore them?
- Climate Change: Another argument commonly seen concerns climate change. Hydro power is not really clean.

(https://thetyee.ca/News/2018/01/24/Megadams-Not-Clean-Green/?fbclid=IwAR1wx2x-T3y0aRe5EB43XNHeph4cH1_f_F-Xqlh64IMxxaQ37G1XAjQoI5s) (visited March 31, 2019) It is arguable that HQ will not be providing the climate change benefit that we have heard from the Governor and CMP.

• The following was written in an article about Hydro-Quebec: "If Hydro-Québec were to reduce imports into New England through other transmission lines in order to supply Massachusetts, <u>which the contract does</u> <u>not prevent or penalize</u>, the impact on New England carbon emissions could be a wash." (<u>https://commonwealthmagazine.org/opinion/hydro-quebecs-greenwashing-game/</u>) (visited March 17, 2019). This statement effectively corrupts Governor Mills' climate change benefit claim.

Questions:

- Why can't Maine implement an independent assessment before this NECEC project is approved? If not then what is the reason for an independent assess to be implemented (other than cost which CMP ought to pay.)?
- What are the real environmental costs Maine will bear as a result of the NECEC? Who has calculated the potential damage and loss other than a passing guess by CMP?
- Why is this project so important and why is there only one route that must be followed at all costs? I have not heard a reasonable discussion about this question and it is a very fair question.
- What is **really going on here?**

Richard W. Aishton, Ph.D. Environmental Dynamics and Policy Analyst Farmington, Maine 04938