

Kirkland, April

From: Roger Merchant <rogmerch@gmail.com>
Sent: Monday, March 25, 2019 3:46 PM
To: DEP, NECEC; Hinkel, Bill
Cc: Roger Merchant
Subject: NECEC Public Comment
Attachments: MH_THC REVIEW & RESPONSE.docx

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Dear LUPC and DEP Staff,

I am submitting to you this Public Comment concerning the NECEC Project. Please confirm back to me receipt, and that it has been posted to public comment. A file of the same is attached.

Thank you,

**Roger Merchant
Glenburn, Maine**

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REVIEW & RESPONSE
Roger Merchant, ME LPF#727
Glenburn, Maine

To:
The Nature Conservancy in Maine Testimony
By
Malcolm L. Hunter Jr., PhD.

Preface: The following *referenced citations* from my review of Malcolm Hunter's document for TNC, lends credence to petitioning and requesting that the Governors Office, The State Energy Office, LUPC and DEP, and the Legislature slow down, if not halt, the NECEC review process. In the interim, an independent assessment of the full range of social, economic and environmental **costs and benefits** of NECEC needs to occur and brought before the public, before any decisions on permitting.

Point #1... Incomplete Analysis

"The Conservancy strongly asserts that the project will have significant cumulative and long-term impacts on the regions wildlife, and that the compensation and mitigation currently proposed are inadequate and not commensurate with those impacts."(Pg. 2, Par.3)

Since day one NECEC has focused solely on economic benefits and the necessity of HQ power being transmitted through Maine to customers in Massachusetts. The deep pool of benefits includes million upon millions of promised financial resources to Maine individuals, organizations, towns, counties and the State of Maine. Given this exclusive emphasis on benefits only, then from a true Sustainable Development perspective it's fair and wise to ask, "okay benefits, benefits, but what about the full range of costs and benefits: socially, economically, environmentally"

Point #2... Fragmentation Impact Minimization by NECEC

Habitat fragmentation is the focus of Hunter's research-based document, *"it is widely recognized that fragmentation is one of the leading causes of biodiversity decline across the globe."* (Pg.3,Par.1)

The working forests in NECEC Segment 1 are a shifting patchwork of forest types and harvests, all linked by an extensive network of interconnecting roads, some already contributing to fragmentation. It's worth noting in Hunter's findings, *"The proposed NECEC corridor would be a permanent fragmenting feature, much like the few major forest roads in the region...A 150 foot wide power line will create a wider barrier to movement than a typical woods logging road."* (Pg.3, Par.2&3)

Point #3... Landscapes, Wildlife Habitat, Regulatory Review Short-Sidedness

- The Nature Conservancy has experience with mapping and evaluating lands that are Resilient and Connected and in relation to growing concerns about climate change and biodiversity. *"There are no known examples of comparable development projects [power lines] in Maine that traverse lands mapped as Resilient and Connected."* (Pg.3, Par.4) Given the reality and emergence of climate change-forest change, as well as the permanent fragmentation impact of the power line, this comment suggests a significant information gap in NECEC's environmental assessment and impact information base.
- In terms of habitat loss and alteration, Hunter's report states, *"Segment 1 will result in a loss of nearly 1000 acres of habitat for forest-dwelling species... For species with small home ranges such as red-backed salamanders, a thousand acres could impact millions of individuals...For larger species, the altered habitat in a utility corridor may serve as a barrier to movement (Pg.4,Par.2).* The deforestation of 1000 acres is also a loss of 1000 acres of forest carbon storage, Additionally, a significant portion of boreal-forest carbon storage loss has occurred within the 15,000 square km area flooded at the HQ power source for the NECEC Project.
- Further troubling are edge effects from an open corridor, extending deeper into adjacent forests either side a power line, *"forest edge microclimates are typically windier, warmer, and dryer than forest interiors."* (Pg.4,Par.3) The complexities skirted by NECEC have higher stakes, *"many studies suggest that the distribution and density of ungulates (deer, moose) are affected by power line ROW's, especially when combined with roads"* (Pg.4,Par.2)

Wildlife impacts and some mitigation ideas appear in CMP reporting, and they address a few key species like deer. However, NECEC comes nowhere near addressing the range and extent of species vulnerable and at risk as documented on Pages 4 & 5 in Hunter's report. The point is reinforced in Janet McMahon's comprehensive, detailed report, "Forest Fragmentation in the Western Mountains Region."

- Hunter's bottom line on edge effects from NECEC, *"assuming an edge effect of 330 feet the acreage affected by segment 1 jumps roughly five-fold to 5,000 acres, and, assuming an edge effect of 1,000 feet, the acreage affected increases nearly fifteen fold."* (Pg.6, Par.1)
- Hunter further notes that long-term impacts from fragmentation take years, even decades to play out on any landscape. Of particular concern to any regulatory review and permitting is this citation, *"the regulatory framework often falls short in acknowledging cumulative impacts..."most impact assessments neglect the long-term effects of transmission lines on biodiversity.* (Pg.7,Par.2)

Closing Remarks:

My review of Hunter's credible testimony has brought me to a deeper understanding of the environmental impacts that NECEC will have across the Maine landscape. As stated in my preface, NECEC emphasis has been solely, exclusively on the benefits, benefits, benefits. Absent in their pitch, and underscored in Malcolm Hunter's paper is a fair and complete assessment of environmental **costs and benefits**. His closing remarks mirror public shared concerns about NECEC...

"The proposed mitigation and compensation plan does not adequately address the cumulative impacts to the full array of Maine's wildlife... Because of the global ecological importance of this region and the substantial length of the new corridor, it is challenging to find comparable examples of regulatory review and commensurate mitigation and compensation... It is my contention that based on the evidence presented, CMP has not made adequate provisions for the protection of wildlife and fisheries."(Pg.8,Par.2&3)

A Last Note... A Get-Real Sustainable Development Assessment

The essence of sustainability has been co-opted by the erroneous notion of keeping the development peddle to the metal, to sustain what we've always done. I would argue that NECEC needs a full, rigorous application of Sustainable Development tools, a reasoned assessment of the three key, interrelated components that comprise true sustainability; the economic, the social, the environmental.

In Sustainability Solutions each and all three are vital to restoring, protecting, utilizing, growing the economy, as well as nourishing and growing our shared sense of place and rural quality of life.

*That being said, I come back to this fundamental position... That we the public need to petition and request that the Governors Office, The State Energy Office, LUPC and DEP, and the Legislature put on hold for 18 months, the NECEC review process and any decisions, to permit. In the interim, an independent assessment needs to be made on the full range of social, economic, environmental **costs and benefits** and this needs to be brought before the public, before any decisions on permitting are made on NECEC.*

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