

Beyer, Jim R

From: Clement, Jay L CIV USARMY CENAE (US) <Jay.L.Clement@usace.army.mil>
Sent: Monday, March 18, 2019 8:17 AM
To: 'Mirabile, Gerry J.'; Mark Goodwin
Cc: Matt Manahan; Beyer, Jim R; Hinkel, Bill; Kern, Mark; Pauley, Melissa
Subject: HVDC Alternative
Attachments: 2019-02-28 FINAL Prefiled Testimony of Chris Russo.pdf

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Gerry/Mark:

You undoubtedly have seen this testimony and your team is presumably preparing a substantive rebuttal. In as much as this alternative would address substantial elements of the public concern for your project, would address early comments from USEPA, and would appear to be at least an "available alternative" vis a vis the Section 404(b)1 Guidelines (in that precedent has been set elsewhere), we are very interested in your analysis of its practicability. Presumably it is technologically practicable and less environmentally damaging, perhaps it is somehow not logistically or economically practicable? We encourage you to be very thorough in your analysis and to frame your response relative to the Guidelines and state regulations. If, for example, you were to argue that it is economically impracticable, how would the added cost of this installation compare to the overall cost of the project PLUS all of the millions in concessions the company is prepared to offer the state and other stakeholders?

Thank you in advance for your consideration. No doubt this will be but one element of your overall response to the various testimonies to be provided at the pending state hearings, so there is no reason to respond at this time unless you wish. Furthermore, our public notice has yet to run its course, which will no doubt generate a much more comprehensive request for additional information and comment rebuttal.

Jay Clement
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Maine Project Office