Dear Recipients:

This letter is to express concerns for fire and other emergency response capacities within the areas located along and adjacent to the proposed NECEC Corridor. (RE: DPU 18-64; DPU 18-65; DPU 18-66)

The Maine State Federation of Firefighters (MSFFF) has a membership of over 6000 firefighters. Many of our members are volunteers within small departments in rural communities. Several of our volunteer members, who serve areas within the proposed NECEC Corridor, contacted us to express their concerns for fire and safety response. These concerns focus not only on the major construction phases of the project, but also on significant risks that will be established and which will continue to exist long after construction crews have left the area and wide areas of high voltage power lines cross their jurisdictions. Further conversations and investigation indicate that to date, no evaluation, assessment, or documentation of the fire, emergency medical, terrorism and other risks, or the services and equipment needed to mitigate those risks, have been formally identified, discussed, studied, and/or reported on.

While Maine is not a “fire regime” it does not mean that catastrophic fires cannot occur here. Rural fire response has improved in the seventy years since “The Year Maine Burned” in 1947, but we must remember October 1947 followed one of Maine's rainiest seasons on record. *(From October 13 to October 27, firefighters tried to fight 200 Maine fires, consuming a quarter of a million acres of forest, taking the lives of 16 people, and wiping out nine entire towns. The Maine fires destroyed 851 homes and 397 seasonal cottages, leaving 2,500 people homeless”.

As we've seen over the last few years in other parts of our country and around the world, fires of magnitude that quickly overwhelm state and local resources are becoming annual events. Additionally, as was demonstrated in 2018 with the Paradise (CA) Campfire; PG&E, the power company whose transmission power lines were responsible for the fire, quickly declared bankruptcy. The convenience of PG&E and its ability to declare bankruptcy leaves Paradise, its victims, and the American taxpayer, to clean up the 150,000 acres of toxic wasteland before any attempt is made to rebuild from the destruction.
Regarding fire suppression and emergency support within the proposed NECEC Corridor, please see the enclose map and note the following:

Approximately 70 miles, from the Quebec border to Bingham, has no organized fire or emergency response capacity. These areas are covered by the Maine Forest Service (MFS). During a typical fire season, approximately March-October, the MFS has Rangers living the area who provide initial size-up once they arrived on scene. Weather permitting, air support from Augusta is dispatched; if air support is not already assigned to another fire in another part of the state. Ground crew members from around Maine may also be called to fight fires. Organizing and staging MFS wildland firefighters for a significant fire takes an hour or more. Fires on a windy day gain a significant headway before crews can arrive to remote areas. Volunteers from rural Maine towns are also trained in wildland firefighting and may respond to assist with MFS and Rangers when available.

The first 100 miles of the proposed Corridor, including the 70 miles covered by the MFS and Rangers, has only three (3) volunteer departments within a one-mile (1-mile) buffer of the proposed Corridor. These are the Bingham, Anson, and Solon Volunteer Fire Departments. This area has no staffed fire services and daytime coverage is extremely limited.

South of Bingham, and still within Somerset County, there are three (3) additional fire departments with a two-mile (2-mile) buffer of the proposed NECEC transmission line. These are the volunteer departments of Starks, Madison, and Industry. Once again, these three additional departments have no staffed fire and daytime coverage is extremely limited.

Please also note that these fire departments also lack sufficient off-road fire support capacity. While several do have smaller 4WD apparatus, sufficient large scale wildland suppression and emergency mitigation equipment is not available in the rural areas of the proposed NECEC Corridor area.

Non-fire emergency medical services (EMS) paramedic response is provided by Upper Kennebec Valley Ambulance out of Bingham. Emergency transports are taken to Redington-Fariview Hospital, 35-miles away. Redington-Fariview hospital has a Lifeflight landing pad, with helicopter transport dispatched from Bangor, Lewiston, or Sanford, if available.

Initial response for terrorist or other types of emergency incidents would come from either the Franklin or Somerset County Emergency Agencies depending on the location of the incident. We have been unable to locate any reference or notice from NECEC on how risk and incidents of this nature would be mitigated.
An example of a known risk that supports the need to evaluate, assess, document and sufficiently mitigate comprehensive fire and emergency risks associated with the proposed NECEC Corridor is shown by the 2017 (draft) Somerset County ME Hazard Mitigation Plan.

The most current available Somerset County Emergency Management Agency Mitigation Plan states the following:

C3 Goals
Wildfires: Reduce damage, injury and possible loss of life in Somerset County caused by wildfires.
Somerset County is subject to wild land fires. The most likely damages caused by a wildfire are the loss of life, loss of prime timberland, and the destruction of personal and real property, especially homes. The loss of electricity is also possible, since many high voltage transmission lines pass through heavily wooded areas. Major wildfires may close commerce, resulting in major losses of income to local businesses and individuals. *There were at least 261 wild land fires in Somerset Country in from 2005 to 2010.

Information to date indicates that consideration of the many emergency hazards associated with the construction and future management of the NECEC Corridor have not been addressed. Due to this oversight, we conclude that the preparedness and safety of our fire fighters, and other first responders who will respond to NECEC Corridor incidents, has been severely overlooked and their security and safety significantly compromised.

The Officers and members of the MSFFF appreciate the opportunity to present these comments and look forward to having the fire, EMS, and other emergency response issues regarding the proposed NECEC Corridor fully evaluated, assessed, and documented. We also encourage the development of and look forward to reviewing mitigation and implementation plans to address associated Corridor risks, and fully support these risks being formally discussed, studied, disclosed, and reported.

Respectfully submitted,

Kenneth Desmond
President, MSFFF
PO Box 911
Sabattus, ME 04280

enc: map of Somerset Cnty Region
Six Fire Departments in Somerset County are within a two mile buffer (4 miles across) of the proposed NECEC transmission line.

Approximately 70 miles, from the Quebec border to Bigham, has no organized fire response department within two miles.

A considerable part of the proposed lines are located in remote areas served by volunteer departments. Additionally, the areas have little to no access or limited capacity roads for firefighters and fire response apparatus.