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Augusta, ME 04333-0022

RE: Group 4 Comment and Testimony on Merrill Strip Alternative

Jim and Bill,

Attached please find Group 4's GROUP 4 Comment on Supplemental Information on the Merrill Strip Alternative from Central Maine Power Company and testimony from David Publicover (Attachment A) and Jeffrey Reardon (Attachment B)

Respectfully submitted,



Susan J. Ely
On Behalf of Group 4 – AMC, NRCM, and TU
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**STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

and

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

IN THE MATTER OF:	)
	)
CENTRAL MAINE POWER COMPANY	)
NEW ENGLAND CLEAN ENERGY CONNECT	)
	)
L-27625-26-A-N	)
L-27625-TB-B-N	)
L-27625-2C-C-N	)
L-27625-VP-D-N	)
L-27625-IW-E-N	)
	)
SLC-9	)
	)

**GROUP 4 COMMENT ON SUPPLEMENTAL INFORMATION ON THE MERRILL
STRIP ALTERNATIVE FROM CENTRAL MAINE POWER**

I. INTRODUCTION

On September 18, 2019, Central Maine Power Company (CMP) petitioned the Maine Department of Environmental Protection (Department) and Land Use Planning Commission (Commission) to reopen the record in the above-captioned matter so that CMP could introduce evidence related to a new proposed route that purports to avoid the Recreation Protection (P-RR) subdistrict at Beattie Pond (CMP Petition). On October 3, 2019, the Department and Commission granted CMP's petition to reopen the record and requested additional information

from CMP. CMP responded to the information request on October 10, 2019, and the Commission and Department determined that the information was complete on October 11, 2019. In the Sixteenth Procedural Order, the Department and Commission provided intervenors the opportunity to submit written responses to the amendment in the form of evidence and comments on or before November 12, 2019, at 5 pm. Group 4 (consisting of the Appalachian Mountain Club, Natural Resources Council of Maine, and the Maine Council of Trout Unlimited) hereby submits the following comment and testimony (Attachments A and B) in response to CMP's supplemental information on the recently proposed Merrill Strip alternative.

After reviewing CMP's proposed route around the Beattie Pond P-RR subdistrict, Group 4 remains deeply concerned that CMP's proposed line poses significant risk to Maine's environment. Not only does CMP's proposed Merrill Strip alternative still result in visual impacts to Beattie Pond—while CMP's Merrill Strip alternative avoids placing any transmission structures within the Beattie Pond P-RR subdistrict the transmission line and structures would be clearly visible from the protected pond itself—it also does not address the fact that the 53 mile section of proposed line, of which the Merrill Strip Alternative is a piece, would severely fragment critical forest habitat, crossing the Appalachian Trail, countless wetlands and streams, and deer wintering areas. As Mr. Publicover notes in his supplemental testimony on the Merrill Strip alternative, while the amendment does not appear to increase forest fragmentation over the original proposal,

[t]he amendment does not in any way address concerns about forest fragmentation raised in my previous testimonies as well as the testimony of multiple other expert witnesses. The new corridor would remain one of the largest fragmenting features bisecting the globally significant western Maine mountains region. The amendment does not in any way reduce or ameliorate edge effects, the permanent loss of existing and potential interior forest habitat, or the impact on habitat connectivity and species movement.¹

¹ Publicover Second Supp. Testimony, p. 1-2.

Mr. Reardon also found that the Merrill Strip alternative would not result in any benefit to brook trout stream habitat in the vicinity of Beattie Pond. In his supplemental testimony, Mr. Reardon stated that the alternative

does not result in any change in impacts to fisheries resources in Number 1 Brook and does not address my concerns about impacts to brook trout habitat from multiple stream crossings with inadequate buffers. Considerable impacts will still be expected from the two crossings of permanent streams and 17 crossings of ephemeral and intermittent streams in the Number 1 Brook watershed, as well as all of the other new stream crossings along Segment 1.²

Furthermore, CMP's late-in-time adoption of an alternative route that it repeatedly rejected as impracticable and too costly throughout the permitting process adds further evidence that CMP is ignoring viable alternative routes that could reduce the environmental impact of this large and destructive transmission line.

II. THE MERRILL STRIP ALTERNATIVE WILL HAVE AN UNREASONABLE ADVERSE EFFECT ON BEATTIE POND. (DEP)

Under the Site Law, the proposed transmission line must not have an unreasonable adverse effect on the scenic character of the area.³ The DEP rules implementing that law further note that "[t]he Department considers scenic character to be one of Maine's most important assets." Group 4 agrees.

Beattie Pond is one of only 176 ponds in the 10.5 million acres of Unorganized Townships designated by the Land Use Planning Commission as a "Remote Pond." Remote Ponds are "inaccessible, undeveloped lakes with coldwater game fisheries." Remote Ponds are managed "to protect the primitive recreational experience and coldwater lake fisheries in remote settings."⁴

² Reardon Second Supp. Testimony, p. 2.

³ 38 MRS §484(3)

⁴ Maine Land Use Planning Commission Comprehensive Land Use Plan, Appendix C-10.

According to the viewshed map submitted by CMP on Oct. 10, 2019, Exhibit C-3, the proposed Merrill Strip portion of the line is potentially visible from at least 8% of Beattie Pond at distances of less than one mile.⁵ It is only the current existence of vegetation that potentially shields the line from significant additional visibility for recreational users on the entire surface of Beattie Pond. Given that Beattie Pond is located in an area intensively managed for commercial timber harvesting, it is highly likely that the vegetation that may currently shield the line from users of the pond will be cut down at some point during the next 20 years, exposing users who are expecting a remote recreational experience to more significant views of the transmission line than suggested by the Exhibit C-3.

CMP's scenic consultant, TJD&A, did further, more specific analysis of the visual impacts of the line from the north end of Beattie Pond. Initially, TJD&A evaluated only one viewpoint from Beattie Pond and concluded that no structures, conductors, or shield wires would be visible from Beattie Pond.⁶ However, after being asked by the Department and Commission to provide further information, TJD&A evaluated a second viewpoint from Beattie Pond and determined that, in fact, structures MS-5 and MS-6 and an unknown length of shield wire will be visible from Beattie Pond at all times.⁷ Unfortunately, TJD&A also did not evaluate visual impacts of the line during leaf off conditions, indicating that even without any additional forest clearing the visual impacts on the pond are likely to be more significant than its analysis indicates.

The unreliability of TJD&A's initial analysis raises, once again, the question of the reliability of their other analyses.

⁵ Oct. 10, 2019, p. 49.

⁶ https://www.maine.gov/dacf/lupc/projects/site_law_certification/slc9/application/PetitiontoReopenRecord_SupplementalInfo.pdf, p. 8/83.

⁷ https://www.maine.gov/dacf/lupc/projects/site_law_certification/slc9/application/slc9_CMP_Response_To_AIR.pdf p. 5/80.

In addition to year-round visibility of structures MS-5 and MS-6 and connecting wires from Beattie Pond, TJD&A's analysis shows that all but two of the Merrill Strip structures and wires could be visible following a timber harvest that removes intervening vegetation. The only thing blocking visibility of structures MS-2, MS-4, and 3006-798 and adjacent wires is intervening vegetation. As noted above, in a commercially managed forest, it is only reasonable to assume that the vegetation will be harvested at some point in the next 20 years, thereby exposing recreational users of Beattie Pond to greater views of structures and wires than suggested by the 8%.

By its own submission, CMP has acknowledged that recreational users of Beattie Pond, a pond designated to be managed for its "primitive recreational experience and coldwater lake fisheries in remote settings," will be exposed at all times and at distances of less than one mile to at least two of seven structures plus wires along this proposed route, and potentially five of seven structures plus an unknown length of wire as a result of usual harvesting practices in the region. Given the Site Law's finding that scenic character is "one of Maine's most important assets," it is an inescapable conclusion that the route will have an unreasonable adverse effect on Beattie Pond, a relatively rare resource that the State has determined to be of significant value, and the route should not be approved.

III. CMP'S RECENT REVISION PROVIDES FURTHER EVIDENCE THAT CMP DID NOT DO AN ADEQUATE ALTERNATIVES ANALYSIS (LUPC and DEP)

CMP's recent amendment to bypass the Beattie Pond P-RR subdistrict in favor of a newly acquired route through Merrill Strip (that CMP repeatedly claimed was not a viable alternative) fits into a larger pattern of the company ignoring or dismissing alternatives as too expensive without adequate analysis. By requesting that the record be opened to consider only the Merrill Strip alternative, CMP attempts to have this alternative route evaluated outside the

larger context of the entire permit and the required alternatives analysis. An alternatives analysis is a critical component of both the Site Law and NRPA review process.⁸ An inadequate alternatives analysis is a fatal permitting defect. CMP's pattern of adopting alternatives previously dismissed by CMP, outlined below, is symptomatic of a defective alternatives analysis. CMP should, at a minimum, have to complete a new alternatives analysis with closer scrutiny of other places where alternative routes were dismissed, such as burial of the line along established corridors (for example, Route 201), burial or rerouting to avoid the three Appalachian Trail crossings,⁹ or increasing pole height to allow more intact forest canopy over brook trout stream crossings such as Cold Stream and its tributaries Mountain Brook and Tomhegan Stream.

The Merrill Strip alternative clearly fits a pattern of an applicant that prematurely dismissed viable alternatives. It is necessary to first outline CMP's permit history with respect to the Kennebec River crossing before turning to the Beattie Pond timeline.¹⁰

⁸ See, eg., 38 M.R.S. § 480-D; 38 M.R.S. § 484(3); 06-096, Ch. 310, §§ 5, and 9; 06-096, Ch. 315 § 9, 06-096, Ch. 335 §§ 3 and 5.

⁹ CMP's alternatives analysis for the AT P-RR zone considered only a single alternative, locating the proposed AT crossing at a different location. While CMP has remained unwilling to entertain any alternative approach to the current configuration, there are at least three other potential alternatives that have not been adequately explored: routing the project along existing roads to avoid this AT crossing, relocating the AT, or burying the line at the proposed AT crossing. The recently revealed discussion regarding the Merrill Strip alternative raise the question of whether there are any undisclosed discussions surrounding an alternative approach to the AT crossing.

¹⁰ This discussion of the numerous changes and permutations of the proposed project route is relevant to the Merrill Strip alternative because it is part of a pattern that indicates that it is likely that other alternative route configurations were similarly ignored or rejected by CMP without adequate review and investigation. In order to demonstrate how CMP's recent route revision fits this pattern it is necessary to identify the other changes and revisions. In isolation, a late-in-time revision may seem like a lucky break for a company that claimed that the suddenly-available new route was "not suitable" or "reasonably available" prior to the close of the record. However, when viewed in context with the numerous other changes to the Beattie Pond and Kennebec River crossings, after tough questioning from the Department and Commission and the formation of local opposition to the project, the new route lends support for the contention that CMP did not conduct an adequate alternatives analysis in the early stages of the project to reveal the full suite of available alternatives. To strike the retelling of the voluminous history of revisions

- On September 27, 2017, CMP submitted permit applications to the Department and Commission for a Natural Resources Protection Act (NRPA) permit pursuant to 38 M.R.S. §§ 480-A - 480-JJ and a Site Location of Development Act (Site Law) permit pursuant to 38 M.R.S. §§ 481 – 490 to construct the New England Clean Energy Connect (NECEC). In CMP’s September 27, 2017, application, CMP proposed a project that would cross the Beattie Pond P-RR, with visibility from the pond, and cross the Kennebec River overhead. In dismissing an alternative underground crossing of the Kennebec River in favor of an overhead crossing CMP claimed that it preferred the overhead crossing because the additional cost of undergrounding was not financially practicable and that the vegetation change from undergrounding infrastructure would still be visible to rafters.¹¹ CMP declared its September 27, 2017, configuration “a technically and economically sound solution that avoids and minimizes environmental impacts to achieve the least environmentally damaging practicable alternative.”¹²
- Despite declaring the initial configuration good enough with no practicable alternatives, CMP revised its overhead crossing of the Kennebec River in December, shifting from a 5-pole above-ground crossing of the Kennebec River to a 3-pole above-ground crossing.¹³
- On May 7, 2018, the Department and Commission submitted a letter to CMP expressing concerns about the revised Kennebec River overhead crossing.¹⁴

would prevent intervenors from painting the full picture of their concerns directly relevant to the revision before the Department and Commission.

¹¹ *Id.* at pp. 2—32-33. In its brief, CMP argued that the underground crossing of the Kennebec River “will be undetectable to the Kennebec river-running community, and CMP will maintain forested buffers on both sides of the river such that there are no views of transmission line structures or overhead conductors, or of either termination station, from the river.” CMP Brief at 9. It is unclear why CMP believed it would be unable to ensure no views of the undergrounding infrastructure when dismissing the alternative as impracticable yet later asserting that there will be no views of the termination stations.

¹² *Id.* at p. 2—1.

¹³ This change was illustrated in updated viewshed renderings in December 2017 and January 2018 and referenced in communications between CMP and agency staff.

- In a July 26, 2018, letter to the Department CMP insisted that the overhead crossing was still the preferred alternative and that “no reasonable alternative exists to the Preferred Alternative that would have less adverse effect upon the natural and recreational features of the affected river segment.”¹⁵
- Fewer than three months later, and without any public indication that it was considering an alternative approach, CMP again submitted supplemental materials, this time outlining a new plan to place the transmission line under the Kennebec River.¹⁶

The Beattie Pond crossing followed a similar pattern.

- In CMP’s September 27, 2017, application, CMP justified crossing the Beattie Pond P-RR subdistrict by noting that routing the proposed line to the south of the Beattie Pond P-RR subdistrict through Merrill Strip Twp was not suitable for the proposed route and was not reasonably available to CMP.¹⁷

¹⁴ https://www.maine.gov/dacf/lupc/projects/site_law_certification/slc9/slc9_DEP_Letter_to_CMP_KennebecCrossing.pdf at 1.

Even though, CMP has redesigned the project reducing the number of structures needed for the crossing from five to three, our concerns regarding the impacts on existing uses and scenic character remain. If approved, the NECEC transmission line would be the only overhead utility crossing of the river between Harris Dam and The Forks Township and as such, represents the only visual impact in a ten-mile section of river.

The Department and the LUPC request that CMP submit additional information regarding alternatives to the overhead crossing of the Kennebec River. From the Department’s perspective at this point in time, both the directional drilling alternative and the Brookfield alternative appear to have less impact on existing uses and scenic character than the proposed overhead crossing. The Department and LUPC are requesting additional and more robust analysis regarding the use of directional drilling technology to place the transmission line beneath the river and the Brookfield alternative.

¹⁵ The NRPA further governs proposed activities that cross any outstanding river segment as identified in section 480-P, and provides that “the applicant shall demonstrate that no reasonable alternative exists which would have less adverse effect upon the natural and recreational features of the river segment.” 38 M.R.S. § 480-D(8).

¹⁶ <https://www.maine.gov/dep/ftp/projects/necec/applications/hdd-amend/>

¹⁷ Sept. 27, 2017, NRPA Application pp. 2—24-25.

- After claiming that no practicable alternative existed, CMP first made a small concession, submitting an application modification to the Department and Commission on January 25, 2019, to reduce the height of one of the structures to make it less visible from Beattie Pond.¹⁸
- At the hearing, CMP again testified that there was no practicable alternative to the Beattie Pond route.¹⁹
- Commission staff released a Staff memorandum and Draft Decision Document on September 4, 2019, identifying the Beattie Pond crossing as problematic and on September 11, 2019, the Commission decided to continue deliberations on the NECEC matter in October because “it was evident that there was a lack of consensus.”²⁰
- Then, on September 18, 2019, just as suddenly as the Kennebec River underground alternative became viable, an alternative route to the south of Beattie Pond emerged from the waste bin of impracticability to become the preferred route, over two years after the initial permit application.²¹

CMP may argue that this pattern of permit modifications shows a willingness to make the project better. But a car manufacturer’s willingness to fix a lemon every time it breaks does not make it a better car, it’s still just a lemon. CMP’s need to continually “fix” small aspects of its proposed project is symptomatic of a bad project. CMP did not conduct an adequate alternatives analysis. It did not fully analyze all of the alternative routes and it too quickly dismissed

¹⁸ Mirabile Direct at 7-8.

https://www.maine.gov/dacf/lupc/projects/site_law_certification/slc9/party_testimony/CMP_Direct_Testimony.pdf.

¹⁹ Berube 4-2-19 Tr. 130.

²⁰ Email to NECEC distribution list from Bill Hinkel, forwarding email from Jim Britt, DACF Communication Director, “LUPC Tables New England Clean Energy Connect Deliberation,” Sept. 11, 2019.

²¹ Sept. 18, 2019, CMP Petition to Reopen Record and Supplemental Information.

https://www.maine.gov/dacf/lupc/projects/site_law_certification/slc9/application/PetitiontoReopenRecord_SupplementalInfo.pdf.

alternatives that the company deemed too expensive at the time. As a result, it failed to truly evaluate whether or not there were opportunities to avoid and minimize environmental impacts to achieve the least environmentally damaging practicable alternative. Without an adequate alternatives analysis, there is no way to know whether there are other practicable alternatives that were rejected by CMP, or never even uncovered, that could have avoided or minimized other environmental impacts from this project, such as impact to wetlands, deer wintering areas, or the overhead crossing of the Appalachian Trail.

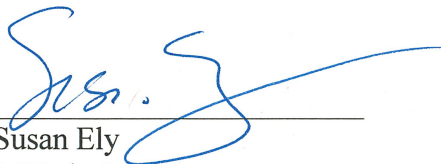
IV. CONCLUSION

The new Merrill Strip route does not fix the fatal flaws in CMP's proposed project. The project would still be clearly visible from the protected pond itself and still would severely fragment critical forest habitat, cross the Appalachian Trail, and impact countless wetlands, streams, vernal pools, and deer wintering areas. Furthermore, this new information provides greater evidence that CMP's alternatives analysis is flawed. Group 4 respectfully requests that CMP's permit request be denied.

Dated November 12, 2019

Respectfully Submitted,

Intervenor Group 4
By their attorney/Spokesperson,



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ATTACHMENT A

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

and
STATE OF MAINE
LAND USE PLANNING COMMISSION

IN THE MATTER OF

CENTRAL MAINE POWER COMPANY
Application for Site Location of Development
Act permit and Natural Resources Protection
Act permit for the New England Clean
Energy Connect (“NECEC”)

L-27625-26- A-N
L-27625-TB-B-N
L-27625-2C-C-N
L-27625-VP-D-N
L-27625-IW-E-N

SITE LAW CERTIFICATION SLC-9

SECOND SUPPLEMENTAL TESTIMONY
OF GROUP 4 WITNESS DR. DAVID
PUBLICOVER

November 8, 2019

This second supplemental testimony is offered in response to the Applicant’s supplemental information of September 18, 2019 and October 10, 2019 proposing a realignment of the new corridor around Beattie Pond (the “Merrill Strip alternative”).

Testimony relevant to DEP

While the new route would result in a very minor reduction in some impacts, at the scale of the entire project it offers no benefits, and does nothing to ameliorate the concerns or alter the conclusions presented in my previous testimonies.

The amendment does not in any way address concerns about forest fragmentation raised in my previous testimonies as well as the testimony of multiple other expert witnesses. The new corridor would remain one of the largest fragmenting features bisecting the globally significant

western Maine mountains region. The amendment does not in any way reduce or ameliorate edge effects, the permanent loss of existing and potential interior forest habitat, or the impact on habitat connectivity and species movement.

This amendment, submitted only after it became apparent that the original route might present difficulties with LUPC certification, also raises the question of what other alternatives might have been available to the Applicant had they been properly investigated. The amendment does not correct the Applicant's failure to conduct a proper alternatives analysis that might have eliminated the need for the new corridor in its entirety.

I reiterate my previous conclusion that the proposed project, even as amended, would result in an unreasonable adverse impact on the natural environment, and that DEP should deny the Site Law and NRPA permits.

Testimony relevant to LUPC

The proposed amendment has removed impacts to the Beattie Pond P-RR zone as an issue for LUPC certification. However, the amendment raises a broader question. Of the three P-RR zones impacted by the project as originally proposed, two (Kennebec Gorge and Beattie Pond) have had the impacts eliminated or substantially reduced by subsequent amendments to the application that were originally dismissed as being unavailable or too expensive. They were also implemented only after it became apparent that these impacts were creating concerns about whether the project would be permitted. This raises the question of what alternatives might reduce impacts to the Appalachian Trail P-RR zone, but were dismissed without being properly investigated. These possible alternatives include burying the line in the existing corridor or expanding the corridor to allow a relocation of the trail, but the Applicant admitted that they had

never discussed these possible alternatives with the National Park Service or the adjacent landowner¹.

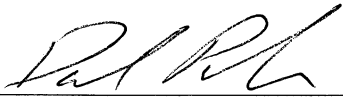
The supplemental testimony in no way alters my previous conclusion that the Applicant has not met the burden of proof for the granting of a special exception for the impacts to the Appalachian Trail P-RR zone, in that they have not demonstrated that there is no suitable and available alternative and that the project would be buffered from existing uses.

¹ See Group 4 Initial Brief at p. 9.

Notarization

I, David Publicover, being first duly sworn, affirm that the above testimony is true and accurate to the best of my knowledge.

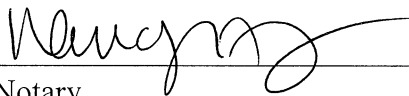
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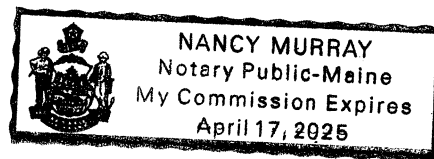


David Publicover
Senior Staff Scientist

The above-named David Publicover made affirmation that the above testimony is true and accurate to the best of his knowledge.

Date: 11/12/19


Notary



ATTACHMENT B

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

and
STATE OF MAINE
LAND USE PLANNING COMMISSION

IN THE MATTER OF

CENTRAL MAINE POWER COMPANY
Application for Site Location of Development
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SITE LAW CERTIFICATION SLC-9

SECOND SUPPLEMENTAL TESTIMONY
OF GROUP 4 WITNESS JEFF REARDON

11/11/2019

This second supplemental testimony is offered in response to the Applicant's supplemental information of September 18, 2019 proposing a realignment of the new corridor around Beattie Pond (the "Merrill Strip alternative"). It evaluates changes in impacts to brook trout habitat and other aquatic resources regulated by the Maine Department of Environmental Protection (DEP) and the Maine Land Use Planning Commission (LUPC).

Testimony relevant to DEP

With respect to stream crossings or other impacts on brook trout habitat or streams, there is little if any difference between this proposal and the earlier proposal that would have passed closer to Beattie Pond. The line as originally proposed crossed a single permanent stream, a

tributary to Number 1 Brook. The relocated line will cross a single ephemeral stream that is a tributary to Number 1 Brook. The change does not result in any change in impacts to fisheries resources in Number 1 Brook and does not address my concerns about impacts to brook trout habitat from multiple stream crossings with inadequate buffers. Considerable impacts will still be expected from the two crossings of permanent streams and 17 crossings of ephemeral and intermittent streams in the Number 1 Brook watershed, as well as all of the other new stream crossings along Segment 1.

This amendment was submitted only after LUPC members indicated that the original route might present difficulties with LUPC certification and raises the question of what other alternatives the Applicant could and should have considered. There are multiple places where relatively minor re-routes to avoid crossings of particularly sensitive streams or to minimize the number of crossings could have been evaluated as alternatives. For example, in my pre-filed testimony, Exhibit 3 identified several crossings I assessed as of particularly high impact due to multiple stream crossings along a short reach of the NECEC line within single, high-value brook trout watersheds, including the South Branch Moose River, Piel Brook, Cold Stream and Tomhegan Stream.¹

The amendment does not correct the Applicant's failure to conduct a proper alternatives analysis that might have eliminated the need for the new corridor in its entirety.

My original conclusion remains unchanged: the proposed project, even as amended, would result in an unreasonable adverse impact on the natural environment, in particular unacceptable impacts to brook trout habitat; the applicants alternatives analysis fails to consider

¹ Pre-filed Direct Testimony of Group 4 Witness Jeff Reardon. Pages 12-16 and Exhibits 3A, 3B, 3C and 3D.

feasible alternatives that would reduce these impacts; and that DEP should deny the Site Law and NRPA permits.

Notarization

I, Jeffrey Reardon, being first duly sworn, affirm that the above testimony is true and accurate to the best of my knowledge.

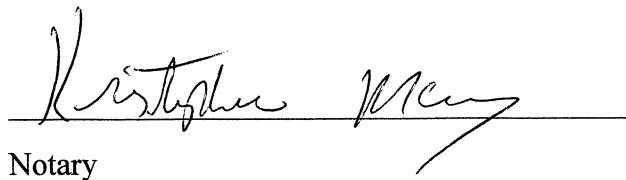
Date: 11/11/2019


Name

Title Maine Brook Trout Project Director, Trout Unlimited

The above-named Jeffrey Reardon made affirmation that the above testimony is true and accurate to the best of his knowledge.

Date: 11/11/19


Notary

Kristopher McCray
Notary Public, Maine
My Commission Expires March 26, 2026