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## Maine Chapter

565 Congress St, 206B  
Portland, Maine 04101  
Phone: (207) 761-5616  
Fax: (207) 773-6690

<http://maine.sierraclub.org>

Gerald Reid, Commissioner  
Maine Department of Environmental Protection  
17 State House Station Road  
Augusta, Maine 04333

Everett Worcester, Chair  
Land Use Planning Commission  
18 Elkins Lane  
22 State House Station  
Augusta, Maine 04330

### **RE: Central Maine Power's NECEC Project**

April 4, 2019

Good Evening- Thank you for holding this Public Hearing

My name is Becky Layton Bartovics and I am here speaking for the 18000 members and supporters of Sierra Club Maine. We are one of 63 chapters nationwide that speaks with one voice. We are working towards Building Thriving Communities in the face of climate change. We stand opposed to Hydro-Quebec power, and stand opposed to the high-voltage transmission line across 53 miles of Maine's unique landscape. The legacy we leave to the next generations will depend upon recognizing that this landscape is of greatest value as forested and wetland habitat that provides succor to all species.

Under the Natural Resources Protection Act (NRPA) the applicant is required to present all practicable alternatives. The application does not consider any other alternatives than this huge transmission line. Where in this plan can we find energy efficiency, and renewables that not only benefit our economy through job development, and retention of local incomes in state, but also improve our health and our overall environment? For Maine, practicable alternatives already exist- efficiency comes first for any energy usage, then renewable development installations, both of which enormously benefit local economies and the environment.

DEP and LUPC should evaluate the impact on wildlife, contiguous forests for adaptation and hydrology, how maintenance of this highway sized swath of a corridor through the region will impact streams and wetlands. Our contiguous forested lands are unique, east of the Mississippi River. Protecting them from development has enormous benefit now and into the future when carbon sinks will preserve habitability for our planet. Not only will this project impact forests here

but it is built upon destroying boreal forests in Eastern Canada. There must be a full Environmental Impact Statement or EIS on the entire project before it is permitted if only due to the impacts on wetlands, streams and rivers.



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We have serious questions first about the lack of demonstrated need for this project and the benefits that will accrue to Maine citizens or ratepayers especially given that we pay the lowest prices for electricity in New England. We question the assumptions on which ISO New England bases its projections. In addition, we question HydroQuebec's assumption that if they build more dams the US market will use all the power. In my forty years of working on energy issues, overall ISO predictions have been overstated. To cavalierly develop Maine's forested lands for outsized energy projections is not going to benefit our economy, our health or our environment. While CMP/HQ are touting a huge infusion of cash to Maine, their contention is not backed up with fact. The paltry sum that CMP/Iberdrola/Avangrid has offered, much of which is in the form of required mitigation funding, pales in comparison to the funds generated to this international corporate consortium and its shareholders.

Additionally, the line expansion- from Coopers Mills to Wiscasset is not explicable. How does that upgraded 26 mile section have any bearing on the NECEC project? What future plans do you have for that line? How does it benefit Maine?

The very name New England Clean Energy Connect is classic greenwashing. Hydropower is not clean energy. World-wide dammed reservoirs emit an enormous amount of methane, a more potent greenhouse gas than carbon dioxide, over more than 20 years. Large, valuable carbon sinks are lost as boreal forests are destroyed to create huge reservoirs and transmission corridors. And, while Hydro-Quebec states that their CO2 and GHG emissions are among the lowest- they do not take into account the impact from raising and lowering water levels in reservoirs as well as the turbulence inherent in dams that further expand releases of GHG emissions. Rotting vegetation under reservoirs triggers a chemical transformation of naturally occurring mercury from its harmless form into methyl-mercury, a central nervous system toxin that bioaccumulates through the food chain. The Innu people have depended upon these fisheries resources that are now at grave peril- in fact Hydro Quebec has alerted those residents that they risk permanent chemical poisoning from ingestion of fish from their traditional food sources downstream.

Seasonal withholding and release of water at periods counter to norms (flooding in winter and depriving systems in spring and summer) impacts the ecosystem in dire ways including removing microscopic organisms that provide feed for species in the Gulf of Maine. There has likely been a resultant dramatic impact on the important fishery resources and thence incomes in Maine. The Saint Lawrence River introduces nutrients into the Scotian Current that feeds into the Gulf of Maine. Our fisheries are impacted by loss of food sources throughout that food chain. These issues represent Costs to Mainer's

The damage to Maine's environment for Massachusetts to benefit from false clean power is huge - crossing 115 streams, 263 wetlands and numerous other ponds that provide critical wildlife habitat while dangling towering power lines over one of our most iconic forested waterways. CMP's Transmission line rights of way will be clear-cut and "maintained" with periodic spraying of a chemical soup of herbicides putting local streams and water downstream in harms way. Bisecting forests with this 53-mile corridor will fracture habitat throughout the region, decreasing biodiversity



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that interconnects and makes our world habitable. The Transmission line is definitely neither clean nor green.

CMP's Transmission line is an onslaught on the people and environment of Maine and our economy. The opportunistic and blatant disregard for the functions and values of the forested lands in western Maine, scientifically proven to act as a carbon sink to New England, is a travesty. Our forest, the lungs of New England, provides a benefit to clean air and water that no scar of a transmission line kept open for years with herbicides and cutover can possibly amend. To suggest that it is a clean way for Massachusetts to don a "renewable energy" cloak going into the future is patently ridiculous and mendacious. Meanwhile how does Maine benefit from this project? The benefits will only accrue to the shareholders of CMP/Avangrid and Hydro Quebec.

Sierra Club Maine urges the DEP and LUPC to reject this permit application on the basis of NRPA.

Respectfully submitted,

Becky Layton Bartovics  
Energy & Climate Action Advisory Teams