



23 April 2019

James R. Beyer  
Regional Licensing and Compliance Manager  
Bureau of Land Resources - Eastern Maine Regional Office  
Maine Department of Environmental Protection  
106 Hogan Road  
Bangor, Maine 04401

Dear Jim,

It is my understanding that The Nature Conservancy has made mitigation proposals for several areas in the new corridor portion of the NECEC. Specifically, tall pole structures would be used in these areas that were sufficiently tall to maintain the full canopy tree height. Another option would be to taper the vegetation in the corridor so that it is as tall as possible yet remains outside the wire hazard zone. This proposal is being made to minimize wildlife impacts. I have been asked to comment on the visual effects.

It is my understanding that this area is valued for its relative remoteness; visual impacts would be to people engaged in activities that value this condition. Where viewers are in the forest, which is most of this area, they will not have views of the taller structures and they will not encounter a cleared ROW. The impacts will occur in two situations: open water and rivers with associated wetlands, and from elevated viewpoints, such as summit viewpoints. A cursory review identifies the following locations with potential visibility of the proposed NECEC project that may have increased visibility of larger structures.

Several lakes are likely to have increased visibility of significantly taller structures.

- Beattie Pond in Beattie Twp
- Fish Pond in Hobbstown Twp is identified as having outstanding scenic quality
- Grace Pond in Upper Enchanted Twp
- Hall Pond in T5 R7 BKP WKR
- Iron Pond in T5 R6 BKP WKR
- Little Wilson Hill Pond in Johnson Mountain Twp
- Moore Pond in Bradstreet Twp
- Mud Pond in Beattie Twp
- Parlin Pond in Parlin Pond Twp
- Rock Pond, in T5 R6 BKP WKR is identified as having significant scenic quality
- Spencer Lake in Hobbstown Twp is identified as having outstanding scenic quality
- Toby Pond in Hobbstown Twp
- Upper Tobey Pond in T5 R7 BKP WKR
- Whipple Pond in T5 R7 BKP WKR is identified as having significant scenic quality

- Wing Pond in Lowelltown Twp

The current proposal also is visible from wetland in the Attean Pond-Moose River Focus Area, and it will likely increase with significantly taller structures. This includes Number 5 Bog, which is a national Natural Landmark.

The other situation where larger structures may increase visibility is from elevated viewpoints. In the review of the VIA, concern was expressed about views from the Attean View Reset Area. The nearest structures are 5 miles distant and will be difficult to discern. Larger structures have a greater chance of being seen, but at this distance it is the cleared ROW that is most visible and TNC's proposal is to eliminate ROW clearing. Other elevated viewpoints include Number 5 Mountain, where the nearest structure is 3.9 miles away, and Coburn Mountain, where the closest structures will be approximately 1.7 miles away. In both cases the larger structures may be slightly visible, but the weathered steel will not have a high contrast against a forested ROW. There is the added benefit that in these areas, the ROW is not cleared, so it will not present a straight line in an otherwise natural setting. This reduces the project's overall visibility, particularly in winter.

Generally, I would anticipate that the ROW would be more visible and more difficult to maintain if the clearing were "tapered." In any event, it is important that the taller structures be weathered steel poles, not lattice structures. The public generally views poles more favorably than lattice structures.

Sincerely yours,



James F. Palmer

Scenic Quality Consultants  
42 Killarney Drive  
Burlington, VT 05408