

**STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

IN THE MATTER OF:

CENTRAL MAINE POWER COMPANY  
NEW ENGLAND CLEAN ENERGY CONNECT

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

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) LICENSE SUSPENSION HEARING  
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) REBUTTAL TESTIMONY OF  
) JUSTIN PREISENDORFER  
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**PRE-FILED REBUTTAL TESTIMONY OF JUSTIN PREISENDORFER ON BEHALF  
OF INTERVENORS WEST FORKS, ET AL.**

This testimony is presented in rebuttal to the pre-filed direct testimony filed by Central Maine Power Company and NECEC Transmission LLC witnesses Thorn Dickinson, Gerry Mirabile and Lauren Johnston. This rebuttal testimony focuses on the topic of re-routing alternatives to avoid the public lands in question in Black v. Cutko, including the location and feasibility of the proposed alternatives.

My name is Justin Preisendorfer and I'm a private consultant on matters related to wildlands, recreation, and the management thereof. I have worked in the field for more than twenty-five years with a focus on northern New England. My testimony is reflective of my professional opinion and is not associated in any way with my primary employment with the USDA Forest Service. My CV is attached.

The NECEC project is currently held up by the pending Black vs. Cutko case and the proposed alteration of public reserve lands. Presumptuous construction has pushed toward the site, changing the landscape as it progresses. With a legal hurdle in the project roadmap, there is suddenly talk of options which would avoid this parcel. What options? There are no viable re-



routing alternatives which have been analyzed and permitted, and thus, the project should not be allowed to proceed with so much left in doubt. While Thorn Dickinson will tell you that the project is progressing and too big to fail, the jury is still out.

The re-routing alternatives described in Mr. Dickinson's testimony are both concerning, each with its particular issues. Both of these alternatives would extend the length of the transmission lines and increase associated corridor impacts. Their visibility on the landscape would increase from key recreational resources such as the Dead River and Old Canada Road Scenic Byway. Additional poles and support structures would be needed above what's called for in the primary plan. Such short-sighted modifications to the landscape will change the quality of life of residents and the experience for those visiting the area. The nature and extent of the impacts associated with these re-routing alternatives was never analyzed or disclosed to the public. Current permits not associated with the public reserve lands should be suspended while this analysis occurs and permits for the greater project should be revoked and considered for reissuance when an alignment is finalized. These permits were issued for an alignment that was presented in a different location than what is being discussed.

The contract deadlines under which NECEC is trying to operate are forcing decisions based on incomplete analysis and it's not just the landscape that stands to suffer. [REDACTED]

[REDACTED]  
[REDACTED] Late-breaking

alternatives should not be rubber-stamped just because the project proponents have doubled down on their dozers and pole installation crews. This wildly unpopular project deserves a deliberate look when so much is at stake.



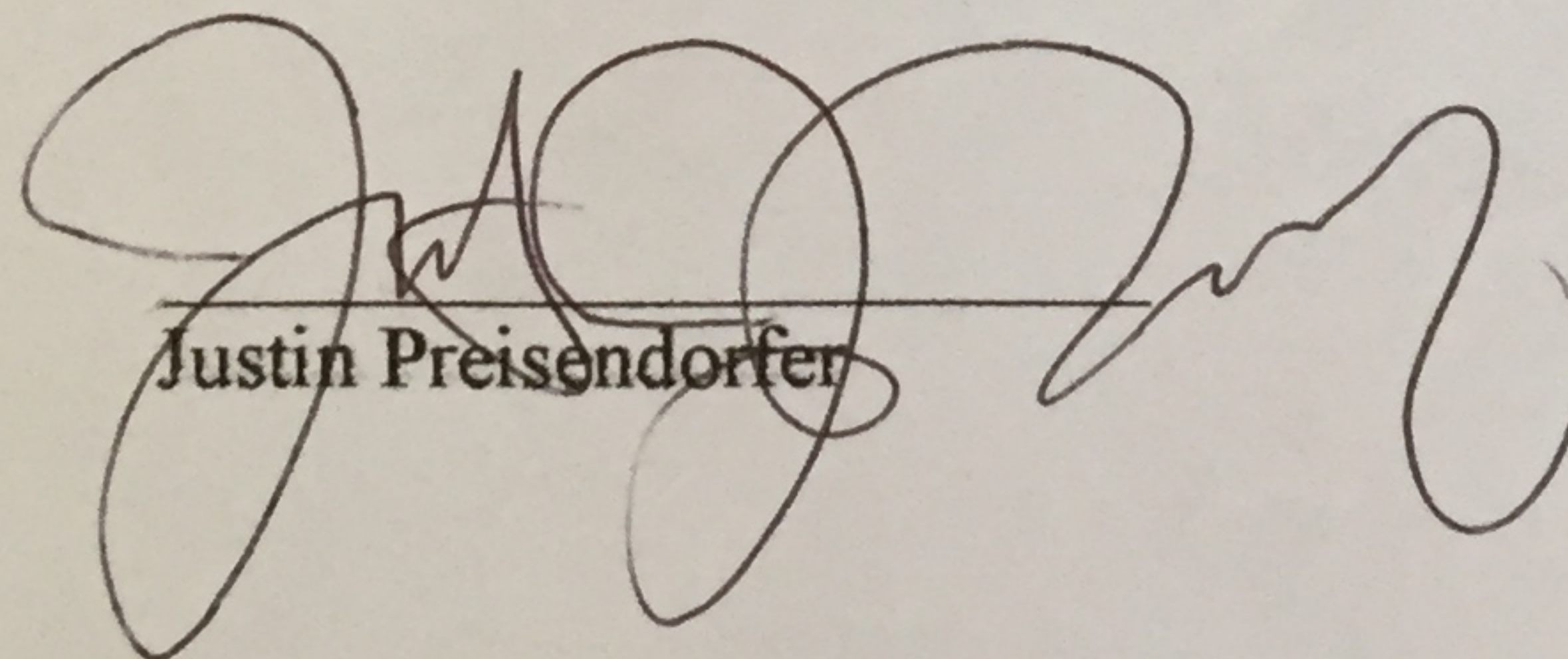
The current mitigation measures were developed as compensation for impacts expected to be lesser in extent than what is being discussed in the re-routing alternatives. With a change in the proposed action there must be a reasonable time afforded to review prior agreements to determine adequacy with the changed conditions.

I am deeply concerned that based on NECEC's timeline this project is going to move forward with little other than a cursory review even when the proposed actions varies from what was analyzed. Delays in the project will soon force project activities to occur outside the window of preferred cutting as defined in NECEC's ACE permit. Such activity could have disastrous effects on species such as *Myotis septentrionalis*, which is currently listed as Threatened but being reviewed per court order for listing as Endangered. The project's impacts continue to grow above and beyond what was expected based on the initial proposal and it's time to put on the brakes. This project is bad for the people and environment of Maine.

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

Respectfully Submitted,

Dated: October 12, 2021



Justin Preisendorfer



**Justin J. Preisendorfer**  
**Recreation and Wilderness Specialist**

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*Relevant Professional Experience*

**Winter Sports Program Manager**

USDA Forest Service; Campton, NH  
2017-present

Responsible for providing oversight to all winter sports opportunities operated under special use permit on National Forest Lands in the eastern Region. This includes long-range planning for a variety of recreational opportunities from mountain-biking and hiking to skiing and snowmobiling.

**Director, Rescuer & Public Affairs Officer**

Mountain Rescue Service; North Conway, NH  
2000-present

Volunteer with rescue organization tasked with supporting Maine Wardens and New Hampshire Fish and Game for all search and rescue operations. This team specializes in technical and arctic rescue and is the premier team of its type in the east. I serve on the organization's Board of Directors and function as the Public Affairs Officer in complex and high-profile incidents.

**Director & Chair**

The Society for Wilderness Stewardship  
2017-2020

Served as the Chair of the Board of Directors for this 501c3 professional organization whose mission is to promote excellence in the professional practice of wilderness stewardship, science, and education to ensure the life-sustaining benefits of wilderness. Their work includes research, education, assistance to the agencies that manage land under the National Wilderness Preservation System.

**Regional Program Manager—Wilderness, Wild & Scenic Rivers, Congressionally Designated Trails**

USDA Forest Service; Milwaukee, WI  
2017

In this position I provided oversight and guidance to 17 national forests and one national tallgrass prairie across the US Forest Service's 20-state Eastern Region in matters related to those areas designated by congress as Wilderness, Wild and Scenic Rivers, or National Scenic or Historic Trails.



### **Director & Treasurer**

The Society for Wilderness Stewardship.  
2014-2017

During my first 3-year term this group supported wilderness research and management projects across the country including wilderness character assessments across diverse landscapes. During these assessments our staff document baseline information related to an area's natural and undeveloped qualities.

### **Supervisory Natural Resource Specialist—Wilderness and Recreation**

USDA Forest Service; Gorham, NH  
2015-2017

In this position I managed a staff of up to 20 individuals responsible for all aspects of wilderness and recreation management on the northernmost of the White Mountain National Forest's three ranger districts. Duties included analyzing potential impacts of proposed activities on areas designated as wilderness or inventoried as having wilderness characteristics.

### **Regional Representative and Chair**

USDA Forest Service Chief's Wilderness Advisory Group  
2009-2014

As a collateral duty I served as a member, Vice Chair, and then Chair for this national group composed of field level managers providing advice directly to the head of the Forest Service on matters of wilderness management.

### **Natural Resource Specialist—Wilderness and Backcountry Recreation Specialist**

USDA Forest Service; Campton, NH  
2011-2015

In this position my staff and I were responsible for the management of the largest congressionally designated wilderness area in the east—the 45,000-acre Pemigewasset Wilderness centered on the river of the same name.

### **Forestry Technician—Wilderness and Backcountry Recreation Manager**

USDA Forest Service; Gorham, NH  
2003-2011

In this position I was the wilderness manager for three areas designated by congress including the Caribou-Speckled Mountain Wilderness—the only designated wilderness in Maine managed by the USDA Forest Service.

### **Climbing Guide**

International Mountain Climbing School; North Conway, NH  
2000-2003

Instructed and guided clients through technical terrain on single and multi-day trips in the United States and abroad.

### **Trails Specialist**



Appalachian Mountain Club; Pinkham Notch, NH  
1996-2002

Trail design, construction and maintenance. Supervision and management of paid and volunteer crews. Projects executed in New Hampshire, Maine and Massachusetts.

### **White Mountain AmeriCorps Member**

USDA Forest Service, Gilead, ME  
1995

Worked with the communities and local partners of the White Mountain National Forest in Maine and New Hampshire. Implemented projects related to forestry, wildlife habitat improvement, endangered species monitoring, environmental education, and recreation resource maintenance.

### *Relevant Education*

- B.S. in Human Ecology, Unity College, Unity, Maine
- Graduate work at Virginia Tech and University of Montana

### *Relevant Honors*

- National Wilderness Workshop (Russellville, AR)—Planning team and moderator 2017
- Wilderness 50th Anniversary National Conference (Albuquerque, NM)—Presenter 2014
- Bob Marshall Champion for Wilderness Stewardship National Award—2013 Forest Service recipient
- 9th World Wilderness Congress (Merida, Mexico)—Invited delegate & presenter 2009
- White Mountain National Forest Wilderness Stewardship Award—2005 recipient (only awarded twice in the last 15 years)
- Frequent presenter for interagency wilderness management trainings delivered by the Arthur Carhart National Wilderness Training Center
- Frequent discussion leader for (under)graduate courses offered through the University of Montana Wilderness Management Distance Education Program
- Member of review team for the US Forest Service's Wilderness Character Monitoring Technical Guide.
- Subject matter expert for management of climbing resources (agency policy, local climbing management plans, partnerships)