

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-TG-B-N/)
#L-27625-2C-C-N/#L-27625-VP-D-N/)
#L-27625-IW-E-N)

CENTRAL MAINE POWER COMPANY)
NEW ENGLAND CLEAN ENERGY CONNECT)
SITE LAW CERTIFICATION SLC-9)
Beattie Twp, Lowelltown Twp, Skinner Twp,)
Appleton Twp, T5 R7 BKP WKR,)
Hobbstown Twp, Bradstreet Twp,)
Parlin Pond Twp, West Forks Plt, Moxie Gore,)
The Forks Plt, Bald Mountain Twp, Concord Twp)

**PRE-FILED REBUTTAL TESTIMONY AND EXHIBITS OF
JOSEPH CHRISTOPHER ON BEHALF OF
WESTERN MOUNTAINS & RIVERS CORPORATION**

My name is Joseph Christopher. I am a member of the Board of Directors of Western Mountain & Rivers Corporation ("WM&RC"). I have already provided direct testimony on behalf of WM&RC.

The purpose of this Rebuttal Testimony is to respond to allegations of certain intervenors, including Elizabeth Caruso, that the New England Clean Energy Connect transmission project ("NECEC" or "Project") will discourage recreational uses of rivers, streams, lands and other natural resources in the vicinity of the Project. See Feb. 28 Testimony of Elizabeth Caruso at 4-5.

Contrary to these claims, the Project is not likely to have an adverse impact on those wishing to use natural resources affected by or adjacent to the Project for recreational activities.

Attached as Christopher Rebuttal Exhibits 1 through 11 are various photographs taken in connection with commercial whitewater rafting. These photos depict large concrete hydro-electric dams, power houses, electricity transmission lines, and other related infrastructure that exists along the Kennebec and Penobscot Rivers. These photos demonstrate that electricity transmission infrastructure is part and parcel to nature-based recreational activities in Maine. Given my experience, those wishing to use rivers, streams, and other natural resources for rafting, boating, fishing, and other recreational activities are not deterred from doing so based on the existence of such infrastructure. For this reason, I am confident, and the Department should conclude, that the facilities proposed as part of the Project will have no more an adverse effect upon those wishing to use natural resources in the vicinity of the Project than existing electricity infrastructure that currently exists.

For the reasons that I stated in my Direct Testimony and those stated by Larry Warren in his Direct and Rebuttal Testimony, the Project will likely provide benefits to The Forks and greater western Maine region in the form of increased access to, and use of, natural resources for recreational and other nature-based activities.

Date: 3/25/19

By:



Joseph Christopher, on behalf of
Western Mountains & Rivers Corporation

State of Maine

County of Kennebec

Date: 3/25/19

The above-named Joseph Christopher, on behalf of Western Mountains & Rivers Corporation, did personally appear before me and made oath as to the truth of the foregoing pre-filed testimony.



Notary Public/Attorney at Law

My Commission Expires:

CORINNA A. RODRIGUE
Notary Public, Maine
My Commission Expires December 21, 2019





Exhibit 3 - Christopher Rebuttal





Exhibit 4 - Christopher Rebuttal

Exhibit 5: Christopher Rebuttal



Exhibit 6 - Christopher Rebuttal



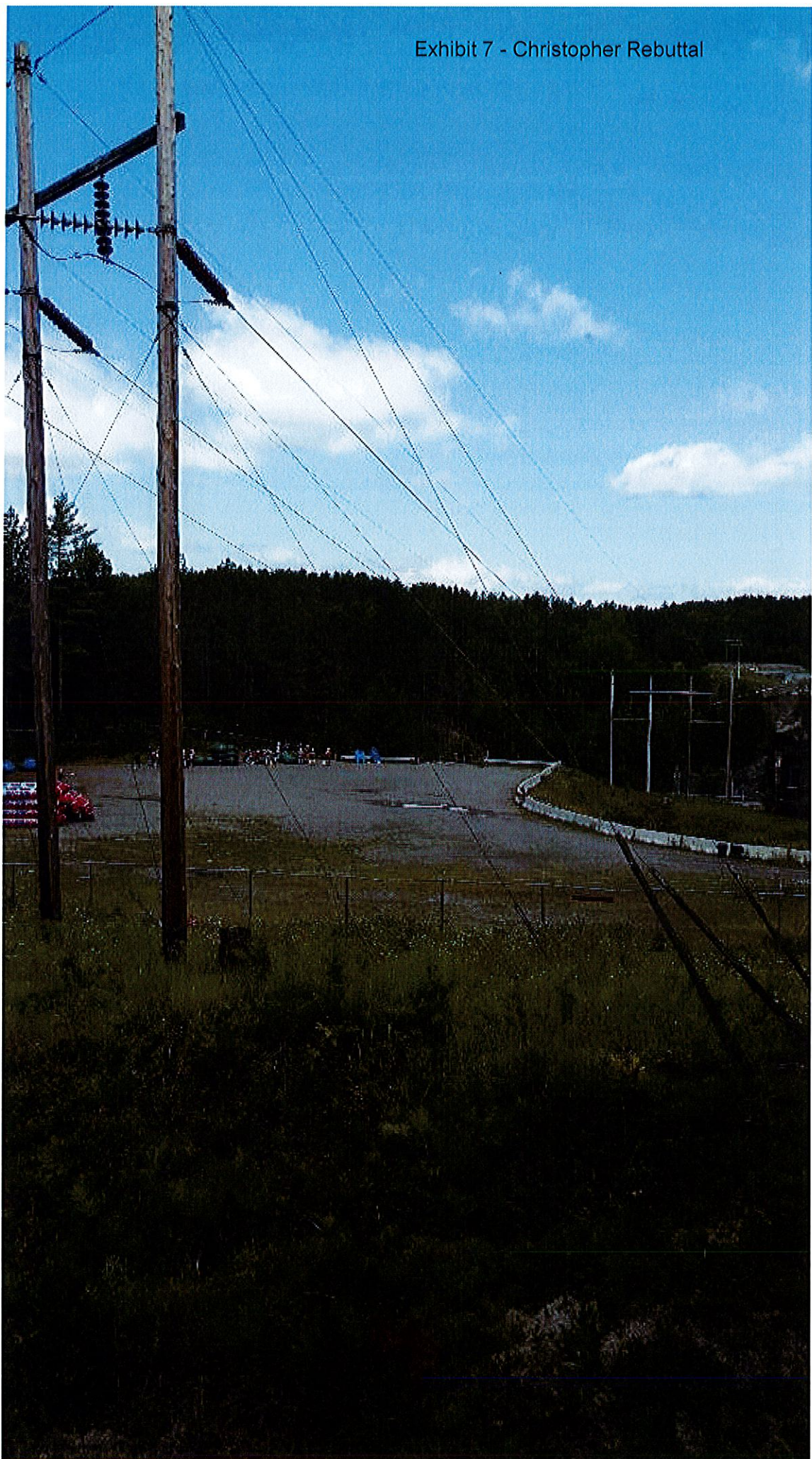




Exhibit 8 - Christopher Rebuttal





Exhibit 10 – Christopher Rebuttal

Exhibit 14 - Christopher Rebuttal

