

Kirkland, April

From: jimbriggs609@everyactioncustom.com on behalf of Jim Briggs <jimbriggs609@everyactioncustom.com>
Sent: Sunday, April 07, 2019 11:02 AM
To: DEP, NECEC
Subject: NECEC Wildlife Impacts Not Properly Avoided, Mitigated, or Compensated

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Dear Maine Department of Environmental Protection,

I am writing in opposition to the proposed NECEC transmission line for a number of reasons. Primary among them is the unwillingness of the proponents of the plan to adequately address the question of whether this is simply a redirection of already generated electricity, which would not produce the carbon dioxide reductions that are being promoted. This is a fundamental question that needs to be answered, and I don't believe it has been.

Even if an emission reduction would result (WHICH NEEDS TO BE DETERMINED), then I still have these reasons for opposing the project in Maine.

The Applicant is underestimating the benefits of alternate routes. Alternative routes exist (in VT) that would be far less disruptive to wildlife and habitat. The economic cost benefit analysis of the three proposed routes overvalues capital expenditures while undervaluing large, undeveloped and highly connected forest ecosystems and waterways. This leads to an inaccurate assessment of impacts.

The Applicant has not done enough to avoid, mitigate, or compensate for the permanent degradation of this ecosystem. Not enough undeveloped, highly connected forest ecosystems and waterways have been proposed for some form of protection/conservation to compensate for habitat loss/degradation that would be caused by the proposed corridor.

Ultimately, this decision is being made, at least in part, by asking "Has the applicant done enough in avoiding, mitigating, or compensating the State of Maine for the impacts that will result." I think it is extremely difficult to measure the magnitude of the impacts of such a major disruption to Maine ecosystems. Furthermore, I fear that the criteria for deciding upon the suitability of this project (as with many projects) relies on analyses that routinely do not place a high enough value on habitat, while placing too high a value on development. Therefore, I am concerned that decisions are made using faulty analyses.

Thank you for your attention to this important issue.

Sincerely,
Jim Briggs
597 New Gloucester Rd North Yarmouth, ME 04097-6734