



SIERRA CLUB

MAINE CHAPTER

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Title: Army Corps must do an Environmental Impact Statement on the CMP NECEC Transmission line project

Central Maine Power and HydroQuebec's North East Clean Energy Connect (NECEC) Project for electricity to Massachusetts is before the Army Corps of Engineers. Right now, a well-funded misinformation campaign is being pushed by CMP and its parent, Iberdrola, claiming large-scale hydropower is a climate crisis solution, that NECEC will bring reduced-carbon electricity to Massachusetts. Due to NECEC's size, impacts and controversy, it is mandatory that the Army Corps do an Environmental Impact Statement (EIS) that includes open and transparent public engagement.

CMP's NECEC is the second attempt by Massachusetts to acquire hydro-electric power from northern Canada via transmission lines through other New England states. The **rejected** Northern Pass Transmission Line Project (Northern Pass), is largely indistinguishable from the CMP NECEC Project in scope and overall environmental impacts. If anything, NECEC poses greater risks given the plan to cross underneath the Kennebec River and the greater potential impacts on critical habitat of endangered and threatened species. Federal agencies held multiple public hearings and sought public participation at many different stages for Northern Pass; Sierra Club Maine believes the NECEC project deserves the same level of scrutiny and opportunity for public comment.

Currently, there is considerable debate regarding whether electricity from large hydro dams is truly clean energy given methane gas releases associated with construction and operation of such dams, which further exacerbate climate change. Additionally, permitting the project would set a precedent for future megadam applications, increasing larger scale climate-damaging destruction.

Hydro Quebec's megadams cause irreparable harm to local and indigenous communities, permanently poisoning water resources and animals that sustain those communities. HQ's economic plan is to build more dams, harming water and communities along the way. This is a serious climate justice issue

The project would heavily impact Maine's environment and its natural resources. It would be the largest fragmenting feature (nearly 1,000 acres) in the Western Maine Mountains, an ecologically significant and biodiverse region, effectively bisecting and preventing an important wildlife migration corridor, further impacting threatened and endangered species. Additionally transmission corridors will be clear-cut and "maintained" with periodic spraying of a chemical soup of herbicides putting local streams in harm's way. Numerous studies link herbicide use to detrimental impacts on aquatic plants, amphibians and freshwater fish such as our native Brook Trout.

From the beginning this project has been extremely controversial which should trigger an EIS. The numbers of streams, wetlands and significant vernal pools that will be impacted are important criteria for requiring an EIS. The local economic impact on western Maine communities and the burgeoning renewable energy businesses must be carefully evaluated. Western Maine Forests, rivers



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and streams provide logging, guiding and fishing jobs. Renewable Energy is a growing industry. The NECEC project may suppress these important local businesses which are the backbone of Maine's economy.

Iberdrola's Northern Pass Project in New Hampshire demonstrated conclusively that an EIS is necessary for transmission line projects of this scale and intensity. The public deserves, and federal law requires, ample opportunity to provide input through the EIS process on the CMP transmission project, which will affect Maine's citizens and environment for decades.

Unfortunately, our experience is that Maine's Army Corps has been inconsistent in the enforcement of its own regulations, and often relies on the far less detailed Environmental Assessments (EAs) in making its decisions which provides fewer opportunities for public input. The CMP transmission project has too many obvious environmental impacts and is far too controversial for the Corps to take shortcuts in its environmental analysis. It must call for an EIS.

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