

James R. Beyer  
Maine Dept. of Environmental Protection  
106 Hogan Road, Suite 6  
Bangor, ME 04401

Bill Hinkel  
Land Use Planning Commission  
22 State House Station  
Augusta, ME 04333-0022

Mar. 7, 2019

RE: Group 4 Objections to Pre-filed testimony and Motion to Strike.

Jim and Bill,

Attached please find Group 4's Objections to Pre-filed Testimony and Motion to Strike.

Please let me know if you have any questions.

Respectfully submitted,



Susan J. Ely  
3 Wade Street  
Augusta, ME 04330  
(207) 430-0175

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

and

STATE OF MAINE  
LAND USE PLANNING COMMISSION

IN THE MATTER OF

CENTRAL MAINE POWER COMPANY  
Application for Site Location of Development  
Act permit and Natural Resources Protection  
Act permit for the New England Clean Energy  
Connect (“NECEC”)

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

SITE LAW CERTIFICATION SLC-9

AMC, NRCM, AND TU WITNESS LIST

February 15, 2019

Intervenor Group 4 submits the following list of witnesses and topics.

**Jeff Reardon, Maine Brook Trout Project Director, Trout Unlimited.**

- Mr. Reardon will testify regarding the alternatives analysis (DEP and LUPC), impacts to coldwater fisheries (including impacts on brook trout habitat and riparian buffers for brook trout and Atlantic salmon habitat), fragmentation of coldwater fisheries habitat, and on the adequacy of compensation/mitigation for impacts to coldwater fisheries habitat.

**Todd Towle, Owner, Kingfisher River Guides**

- Mr. Towle will testify regarding impacts on scenic character and existing recreational and commercial uses (DEP and LUPC), including coldwater fishing and guiding for coldwater fishing.

**Aram Calhoun, Professor of Wetlands Ecology, University of Maine.**

- Professor Calhoun will testify on the impacts of the proposed powerline on vernal pools.

**Ron Joseph, retired wildlife biologist**

- Mr. Joseph will testify on the impacts of the proposed powerline on deer yards.

**David Publicover, Senior Staff Scientist, Appalachian Mountain Club.**

- Mr. Publicover will testify on DEP topics related to wildlife habitat and fisheries, alternatives analysis, and compensation and mitigation. Mr. Publicover will testify on LUPC topics related to scenic character and existing uses and the alternatives analysis.

**Joint Aesthetic Expert (identification forthcoming)**

- Groups 2, 4, and 10 plan to jointly call an expert to testify on aesthetic and visual impacts.

Respectfully submitted,



Susan J. Ely

On behalf of Group 4 – Appalachian Mountain Club, Natural Resources Council of Maine, and the Maine Council of Trout Unlimited

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