

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

REBUTTAL TESTIMONY OF GROUP 1 WITNESS JANET MCMAHON
March 22, 2019

I present this testimony in rebuttal to pre-filed testimony presented by CMP witnesses Mark Goodwin, Gerry Mirabile, and Lauren Johnston (by adoption of Goodwin testimony). For my rebuttal testimony I hereby adopt the rebuttal testimony of Dr. David Publicover, dated March 18, 2019, which focuses on the issue of habitat fragmentation, and add the following points.

The testimony of Goodwin, Mirabile and Johnston, like CMP’s application in general, fails to acknowledge or address significant regional ecological values that would be negatively impacted by Segment 1. These include:

- 1) The impact of the transmission corridor on the critical regional ecological linkage that connects the forests of New Hampshire, Maine, New Brunswick and the Gaspé. The yellow arrows in the attached exhibit (Group 1 Rebuttal Exhibit 1) shows the major movement corridors as well as landscapes with the highest resilience (darker green) as determined by The Nature Conservancy.
- 2) The transmission corridor will reduce landscape resilience and permeability which are intrinsically tied to the number of barriers and degree of fragmentation within a landscape. The Western Maine Mountain region is considered highly resilient to the potential impacts of climate change because of its high landscape diversity, elevation

gradients, connectivity and permeability. These qualities allow for range shifts and reorganization of natural communities in response to climate change. The corridor crosses what is currently part of the most resilient region remaining in the eastern United States (Group 1 Rebuttal Exhibit 1).

3) The transmission corridor will divide many large forest habitat blocks into smaller blocks, which will compromise habitat for forest specialist species and those that require forest interior habitat. From a regional perspective, intact forest habitat blocks are what set this region apart from southern Maine. Large connected blocks are what makes a landscape resilient, connected, and habitable by forest specialist species. The witnesses do not address or quantify permanent fragmentation of large forest habitat blocks.

4) Negative edge effects are not discussed at all and there are many, such as incursion of invasives, changes in microclimate and species composition in adjacent forest, impacts on stream catchment areas and more. The use of the term "soft edge" is misleading when, in fact, the 106 miles of edge along Segment 1 is considered permanent high contrast edge. The witnesses focus on the values of early successional scrub-shrub habitat, when early successional habitat is abundant in the region. The witnesses do not distinguish between the *number* of species the corridor might support and the *kinds* of plants and animals that may be displaced when forest habitat is permanently converted to scrub-shrub and meadow habitat (such as many mosses and spring ephemeral wildflowers, ovenbirds, wood thrushes and a host of other species).

Date: March 22, 2019

By: Janet McMahon
Janet McMahon

Date: March 22, 2019

The above-named Janet McMahon did personally appear before me and made oath as to the truth of the foregoing rebuttal testimony.

Colleen G. Jones
Notary Public

My Commission Expires Dec 16, 2019

COLLEEN G. JONES
Notary Public • State Of Maine
My Commission Expires Dec. 16, 2019



