1 INTRODUCTION

This Comment-Response Addendum presents the comments (and associated responses) received on the *Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect* (DOE/EIS-0372). Together with the Draft Environmental Impact Statement (EIS) published in August 2005, these documents constitute the Final EIS for the United States (U.S.) Department of Energy's (DOE's) proposed action of amending Presidential Permit PP-89 to authorize Bangor Hydro-Electric Company (BHE) to construct its Northeast Reliability Interconnect (NRI) along the Modified Consolidated Corridors Route.

1.1 PROJECT HISTORY

In 1970, Maine Electric Power Company (MEPCO) — a partnership of Central Maine Power Company, Maine Public Service Company, and BHE — placed in service a 106-mi (171-km), 345,000-volt (345-kV) transmission line interconnecting the Orrington Substation with New Brunswick Power Corporation's (NB Power's) system across the U.S.-Canada border near Orient, Maine. On December 16, 1988, BHE applied to DOE for a Presidential permit to construct, connect, operate, and maintain a second 345-kV transmission line to New Brunswick, Canada. This 1988 transmission line was to extend eastward 84 mi (135 km) from the Orrington Substation to the U.S.-Canada border near Baileyville, Maine, where it was to connect with a transmission line to be built, operated, and maintained by NB Power.

In December 1993, DOE published the Draft EIS (DOE/EIS-0166), and following a public comment period issued a Final EIS in August 1995. DOE signed a Record of Decision (ROD) on January 18, 1996 (61 FR 2244; January 25, 1996), and issued Presidential Permit PP-89 on January 22, 1996, which authorized BHE to construct its proposed 345-kV transmission line along a route identified in the EIS as the Stud Mill Road Route.

In addition to the Presidential permit, the BHE transmission line required regulatory approval from the State of Maine. BHE received its original permit for the Stud Mill Road Route in 1992 and was granted State permit extensions in 1994 and 1996. In 1999, the Maritimes & Northeast Pipeline, L.L.C. (M&N) natural gas transmission line was constructed in the same general vicinity of the Stud Mill Road and BHE's approved transmission line that had yet to be constructed. In 2001, BHE requested a third State permit extension. The Maine Board of Environmental Protection, Maine's primary environmental review entity, conducted a public hearing process and indicated, in a draft order, a preference for BHE to use a route different from the Stud Mill Road Route, one that would be more closely consolidated with established linear corridors. This order was never finalized because BHE withdrew the request for an extension of the State permit. In May 2005, BHE applied to the Maine Department of Environmental Protection for new permits under the Site Location and Development Act, the Natural Resources Protection Act, and Section 401 of the Clean Water Act (CWA).

On September 30, 2003, BHE applied to DOE to amend Presidential Permit PP-89 to allow for the construction of the previously proposed 345-kV transmission line along a route

different than any of those routes analyzed in the 1995 EIS. BHE's proposed transmission line, referred to as the Northeast Reliability Interconnect (NRI), would originate at the existing Orrington Substation and would extend eastward approximately 85 mi (137 km) to the international border between the United States and Canada, near Baileyville, Maine, where it would connect with a transmission line to be constructed, operated, and maintained by NB Power.

DOE has determined that an amendment to the Presidential permit would constitute a major Federal action that could have a significant impact on the environment within the meaning of the National Environmental Policy Act of 1969 (NEPA). For this reason, DOE prepared a Draft EIS to address potential environmental impacts from DOE's proposed action of granting the amendment of the Presidential permit and the range of reasonable alternatives. In the Draft EIS, BHE's proposed Modified Consolidated Corridors Route is identified as DOE's proposed action and preferred alternative. A "Notice of Availability" of the Draft EIS was published in the *Federal Register* by the U.S. Environmental Protection Agency (EPA) on August 26, 2005, and the publication of this notice began a 45-day public comment period that ended on October 11, 2005. This Comment-Response Addendum with the Draft EIS comprises the Final EIS [pursuant to 40 CFR 1503.4(c)]. The Draft EIS may be found on DOE's NEPA Web site (http://www.eh.doe.gov/NEPA/documentspub.html).

1.2 DOE'S PURPOSE AND NEED

The purpose and need for DOE's action is to respond to BHE's request to amend Presidential Permit PP-89. DOE may amend the Presidential permit if it determines that the action is in the public interest and after obtaining favorable recommendations from the U.S. Departments of State and Defense. In making its decision, DOE also considers the environmental impacts of the proposed project pursuant to NEPA, the project's impact on electric reliability, and any other factors that DOE may consider relevant to the public interest. If DOE determines that amending the Presidential permit would be in the public interest, the information contained in the EIS will provide the basis for DOE to decide which alternative(s) to authorize and which mitigation measures, if any, would be appropriate for inclusion as a condition of the permit amendment. A decision, in the form of a ROD, will be issued no sooner than 30 days after the EPA's publication of a "Notice of Availability of the Final EIS" in the *Federal Register*.

1.3 ALTERNATIVE ROUTES ANALYZED IN THE EIS

The EIS evaluates the following four alternative routes:

1. Modified Consolidated Corridors Route,

2. Consolidated Corridors Route,

3. Previously Permitted Route (No Action), and

4. MEPCO South Route.

In addition, the EIS evaluates the rescission of Presidential Permit PP-89. Under this alternative, the transmission line would not be constructed along any route.

All of the routes have the same beginning and end points, namely the Orrington Substation and the crossing of the St. Croix River near Baileyville, respectively (Figure 1.3-1). Also, the initial 12.2 mi (19.6 km) from the Orrington Substation would be identical for all four routes (Figure 1.3-2). All routes would cross primarily commercial forest land and would cross 100-year floodplains and wetlands, including some waterfowl and wading bird habitat. All routes also would cross both perennial and intermittent streams, and depending on the alternative, would cross the Machias, East Machias, and Narraguagus Rivers or associated tributaries. The MEPCO South Route would cross the Penobscot River at two locations.

1.3.1 Alternative One: Modified Consolidated Corridors Route (Preferred Alternative)

From the Orrington Substation, the Modified Consolidated Corridors Route would parallel the existing 345-kV MEPCO transmission line to Blackman Stream in Bradley (Figure 1.3-2). The Modified Consolidated Corridors Route would then proceed northeast within a new corridor until meeting Stud Mill Road and the M&N gas pipeline right-of-way (ROW); it would then proceed east-northeast, generally paralleling the M&N gas pipeline and Stud Mill Road to the international border near Baileyville, Maine (Figures 1.3-2 and 1.3-3). The total distance of the Modified Consolidated Corridors Route would be about 85 mi (137 km) and would consist of 15 mi (24 km) of new ROW, 58 mi (93 km) adjacent to the M&N gas pipeline and/or Stud Mill Road, and 12 mi (19 km) adjacent to the existing MEPCO 345-kV transmission line (including portions that are co-located with the M&N gas pipeline and/or other transmission lines). Figure B.1-1 (Appendix B) of the Draft EIS provides a detailed map of the Modified Consolidated Corridors Route.

1.3.2 Alternative Two: Consolidated Corridors Route

The Consolidated Corridors Route would be similar to the Modified Consolidated Corridors Route, except that it would deviate from it in two locations (Figures 1.3-2, 1.3-4, and 1.3-5). The first and longest route deviation occurs between Blackman Stream and Stud Mill Road near Pickerel Pond (Figure 1.3-4). The second deviation occurs in the area of Myra Camps, just west of Dead Stream (Figure 1.3-5). After the second deviation, the Consolidated Corridors Route and the Modified Consolidated Corridors Route would be identical to the international border near Baileyville, Maine. The Consolidated Corridors Route would traverse a total distance of about 85 mi (137 km) and would consist of 2 mi (3 km) of new ROW, 68 mi (109 km) adjacent to the M&N gas pipeline and/or Stud Mill Road, and 15 mi (24 km) adjacent to the existing MEPCO 345-kV transmission line (including portions that are co-located with the M&N

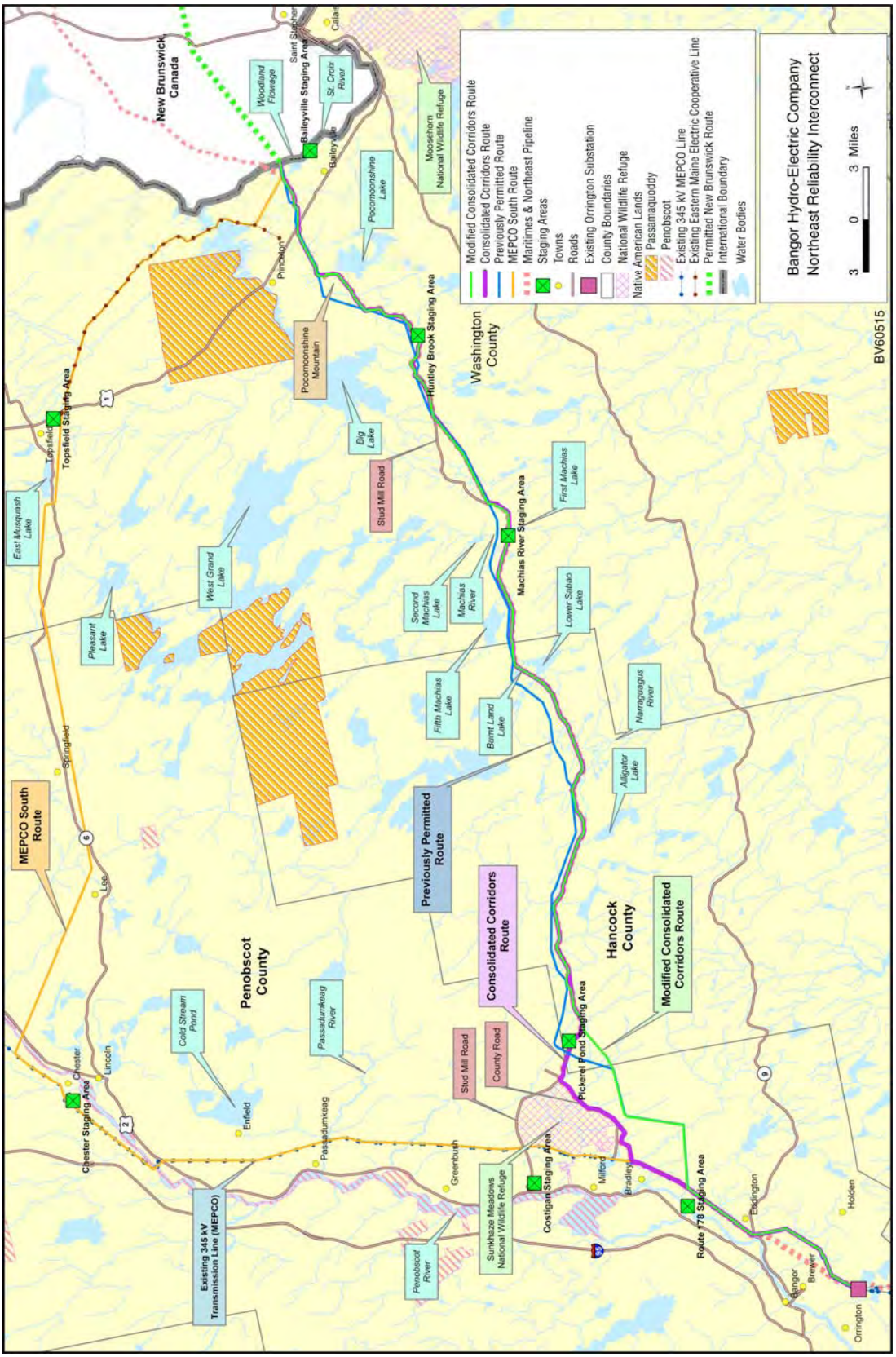

FIGURE 1.3-1 Alternative Routes (Source: Paquette 2005c)

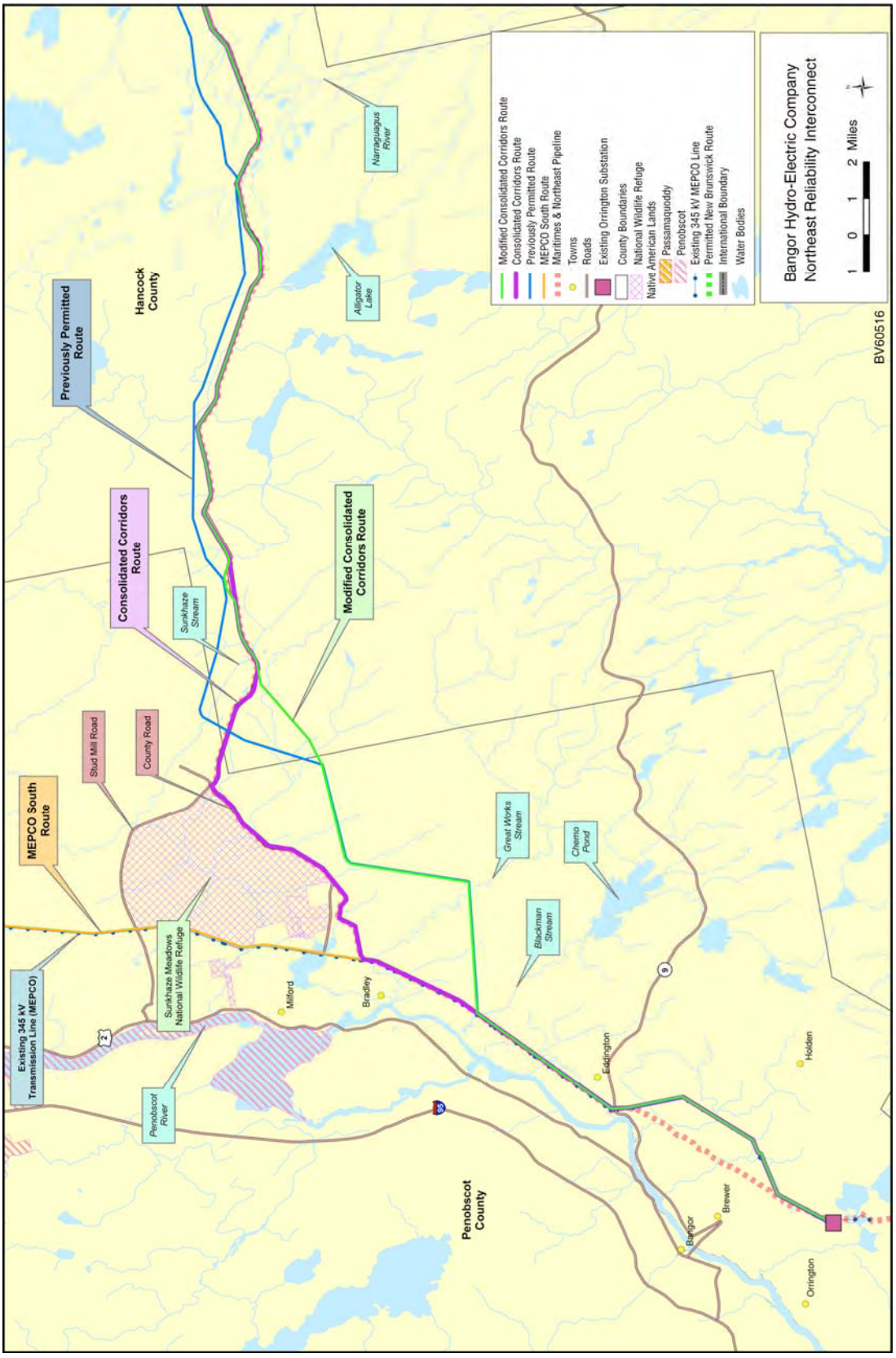

FIGURE 1.3-2 Location Where the Alternative Routes Initially Diverge (Source: Paquette 2005c)

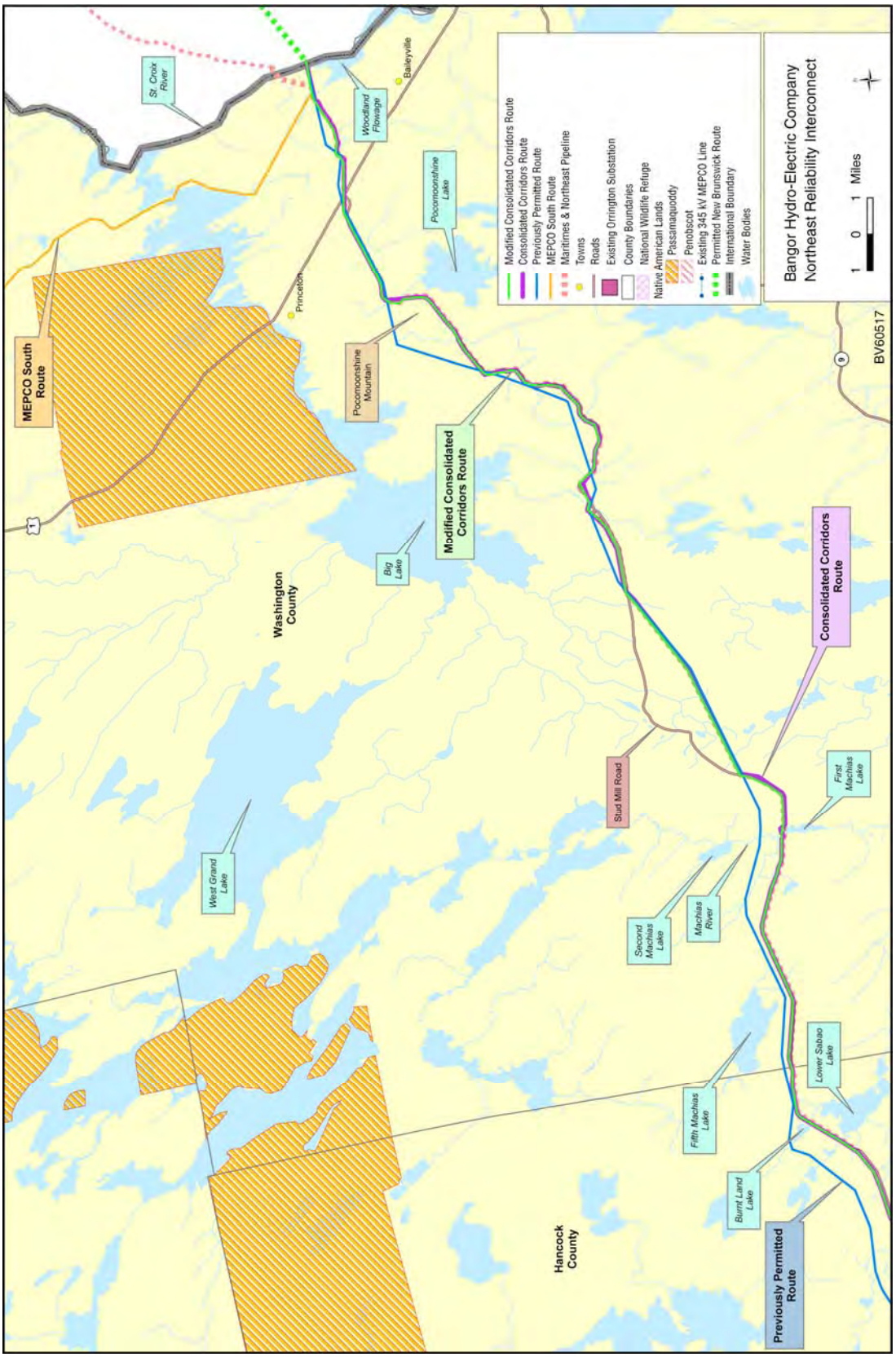

FIGURE 1.3-3 Location of the Alternative Routes within Washington County (Source: Paquette 2005c)

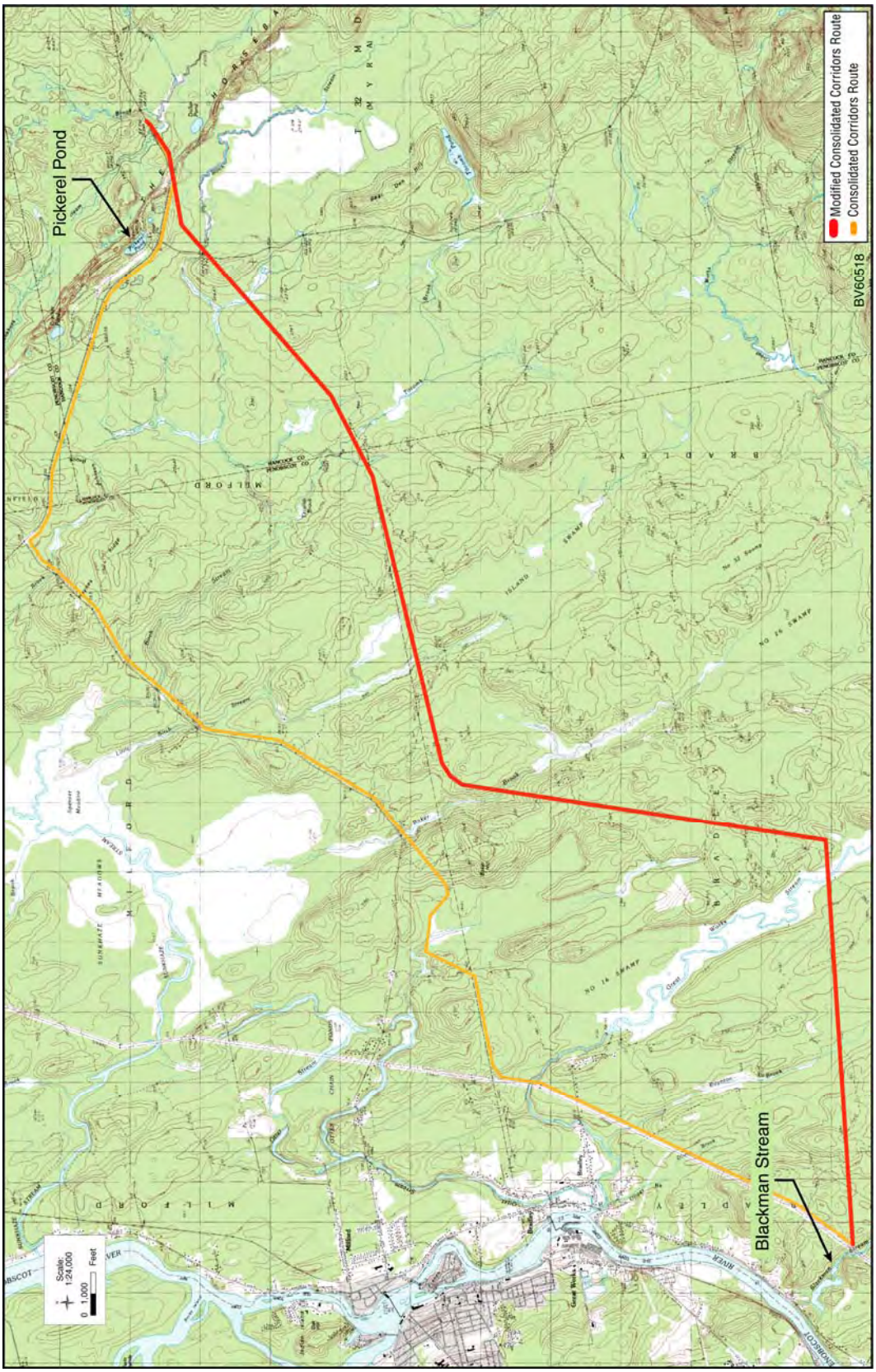

FIGURE 1.3-4 Modified Consolidated Corridors Route and Consolidated Corridors Route Divergence between Blackman Stream and the Pickerel Pond Area (Source: Paquette 2005b)

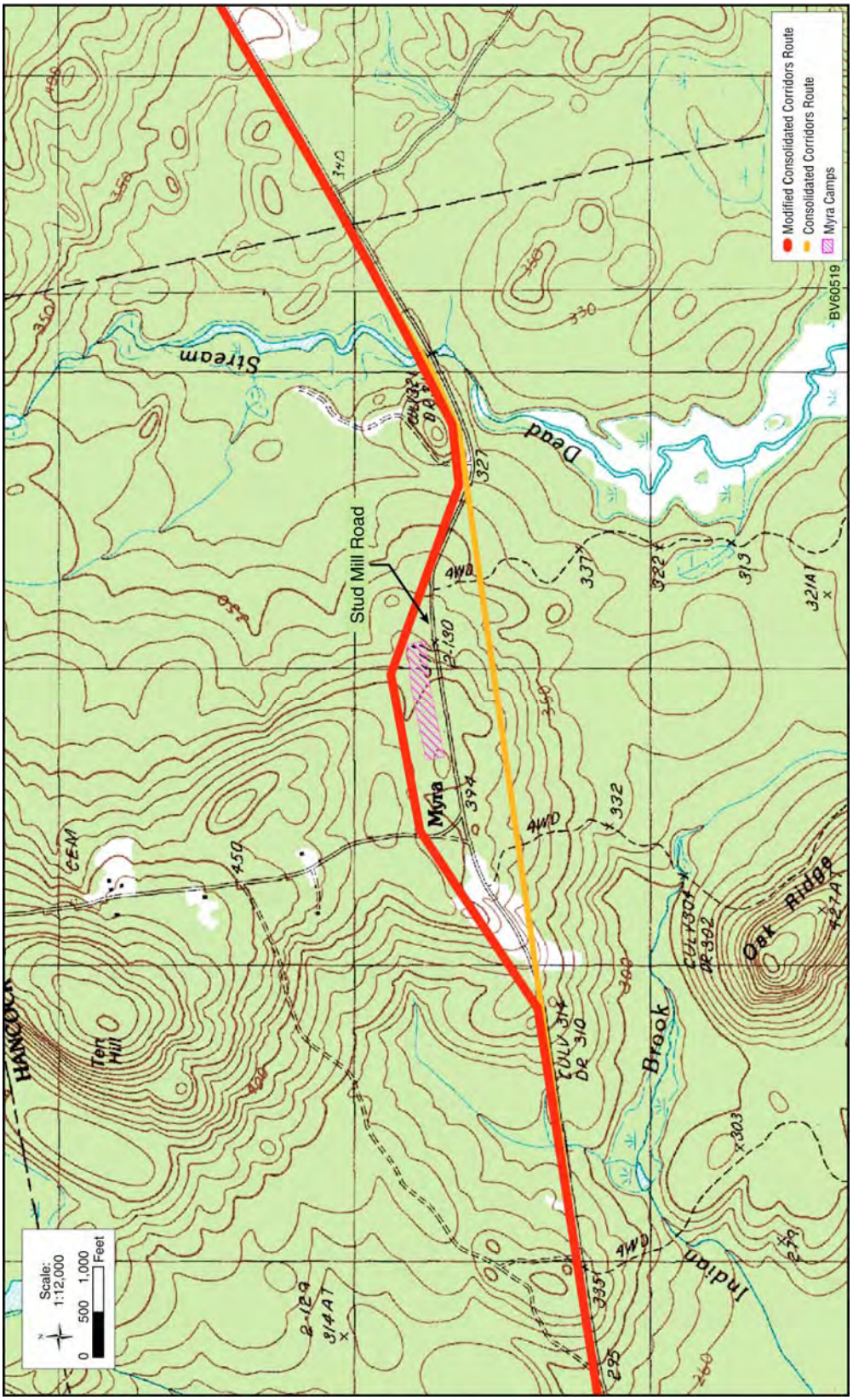

FIGURE 1.3-5 Modified Consolidated Corridors Route and Consolidated Corridors Route Divergence in the Area of Myra Camps (Source: Paquette 2005a)

gas pipeline and/or other transmission lines). Figure B.2-3 (Appendix B) of the Draft EIS provides a detailed map of the Consolidated Corridors Route where it differs from the Modified Consolidated Corridors Route.

1.3.3 Alternative Three: Previously Permitted Route (No Action)

The initial portion of the Previously Permitted Route from the Orrington Substation would be the same as the Modified Consolidated Corridors Route until it crosses the border between Penobscot and Hancock Counties (Figure 1.3-2). The Previously Permitted Route would then proceed to the east-northeast, generally paralleling the M&N gas pipeline and Stud Mill Road to the international crossing near Baileyville, Maine (Figures 1.3-2 and 1.3-3). Although formerly known as the Stud Mill Road Route, the Previously Permitted Route would not be immediately adjacent to the road but would be separated from it by as much as 9,400 ft (2,865 m). The Previously Permitted Route would cross over Stud Mill Road 13 times, would parallel the road in several locations with a separation of about 200 ft (61 m), and would have an average separation of 2,500 ft (762 m). The total distance of the Previously Permitted Route would be about 84 mi (135 km) and would consist of 62 mi (100 km) of new ROW, 10 mi (16 km) adjacent to the M&N gas pipeline and/or Stud Mill Road, and 12 mi (19 km) adjacent to the existing MEPCO 345-kV transmission line (including portions that are co-located with the M&N gas pipeline and/or other transmission lines). Figure B.3-1 (Appendix B) of the Draft EIS provides a detailed map of the Previously Permitted Route.

1.3.4 Alternative Four: MEPCO South Route

From the Orrington Substation, the MEPCO South Route would parallel the existing 345-kV transmission line to Chester, Maine (Figure 1.3-1). This route includes an initial crossing of the Penobscot River south of Lincoln. The route would then proceed generally east (recrossing the Penobscot River) to Route 6 east of Lee, Maine. The MEPCO South Route would then generally parallel, but not be co-located with, Route 6 until just west of Route 1 at Topsfield, Maine. The route would then generally proceed southeast to the international border near Baileyville, Maine (Figure 1.3-1). The total distance of the MEPCO South Route would be about 114 mi (183 km) and would consist of 39 mi (63 km) of new ROW, 54 mi (87 km) adjacent to the existing MEPCO 345-kV transmission line (including portions that are co-located with the M&N gas pipeline and/or other transmission lines), and 21 mi (34 km) adjacent to an existing Eastern Maine Electric Cooperative 69-kV transmission line (Figure 1.3-1). Figure B.4-1 (Appendix B) of the Draft EIS provides a detailed map of the MEPCO South Route.

1.3.5 Rescission of the Presidential Permit

Under the Rescission of the Presidential Permit Alternative, the presently permitted transmission line could not be constructed. Thus, it is reasonably foreseeable that the environmental status quo would continue and that there would be no environmental impacts related to the construction, operation, maintenance, and connection of a transmission line. It is

possible, however, that BHE or another entity could take other actions to achieve the purpose of the proposed project if the currently permitted or proposed transmission line were not built. This EIS does not include speculation on other actions that could be taken in view of a permit rescission, nor does it address the impacts of those other actions.

1.4 DOE'S PREFERRED ALTERNATIVE

In a Presidential permit proceeding, the applicant, rather than DOE, proposes the project. In this event, DOE's proposed action and the range of reasonable alternatives in the EIS for the permit generally are consistent with the applicant's purpose and need and are both practicable and feasible.

State regulatory agencies generally have the responsibility for determining whether and where an electric transmission line should be built within a State. During the State permitting process, the Maine Board of Environmental Protection stated its preference for BHE to construct the proposed NRI along a route that would be more closely consolidated with established linear corridors (Draft EIS, Section 1.1, page 1-2). Therefore, BHE conducted a stakeholder outreach process during which it considered input from Federal, State, and local authorities; Native American Tribes; public interest groups; and other stakeholders on route alternatives (Draft EIS, Section 2.1.1, page 2-2). On the basis of input from this process and after considering other factors, including concerns expressed by the State and local authorities, local zoning and planning regulations, cost and engineering criteria, and environmental and land use considerations, BHE identified the Modified Consolidated Corridors Route as its preferred alternative, and the State of Maine ultimately issued a permit to BHE for construction of the NRI along this route.

Here, DOE has selected the Modified Consolidated Corridors Route as its preferred alternative for two reasons: first, because it is the applicant's preferred alternative and second, because the State of Maine has issued a permit to BHE for development of the NRI along that route. As it happens, this alternative also has the lowest impacts of all of the alternative routes.

Chapter 4 of the Draft EIS presents the impact analyses for each of the alternatives considered in the EIS. A summary of the advantages and disadvantages of each alternative will be presented in the ROD to support DOE's decision. DOE will announce its final decision in the ROD and provide the basis for that decision.

1.5 ORGANIZATION OF THIS COMMENT-RESPONSE ADDENDUM

Chapter 1 of this Comment-Response Addendum provides background information and summarizes the purpose of and need for DOE action and the alternatives analyzed in the EIS. Chapter 2 describes the public participation and comment process for the Draft EIS and presents the comments received during public participation, as well as responses to those comments. Chapter 3 presents changes to the Draft EIS. It provides corrections to the text, tables, and figures and also provides clarifying information to the Draft EIS. The changes have been made to

respond to comments received on the Draft EIS; to reflect changes in, or provide clarification of, interconnect design features (e.g., the decision to use just ball markers rather than ball markers and/or flappers) or procedures (e.g., preconstruction surveys, mitigation measures) that the applicant has further defined since publication of the Draft EIS (Paquette 2005e,g; Faloon Saucier 2005); or to correct errors in the Draft EIS. Chapter 4 presents references cited in Chapters 1 through 3. Chapter 5 presents the distribution list for the Final EIS.

2 COMMENTS AND RESPONSES

This chapter contains an overview of the public comment process and presents the comments received during the comment period and DOE's response to those comments. All comments received were considered in the preparation of this Comment-Response Addendum.

2.1 OVERVIEW OF THE PUBLIC COMMENT PROCESS

DOE distributed the Draft EIS to members of the U.S. House of Representatives and the U.S. Senate, several Federal agencies (e.g., the EPA and the U.S. Army Corps of Engineers [USACE]), State of Maine and local governments, Native American Tribal governments, private industry, public interest groups, and members of the general public (see Appendix I of the Draft EIS), and invited them to submit written comments on the Draft EIS via mail, fax, or e-mail directly to DOE, or to provide oral comments at the public hearings. The Draft EIS was also made available during this time on the project Web site (http://web.ead.anl.gov/interconnecteis) and on the DOE NEPA Web site (http://www.eh.doe.gov/nepa/documentspub.html). Written and oral comments were given equal weight, and DOE considered all comments received. In addition, copies of the Draft EIS were made available in Maine for inspection at the Bangor, Brewer, Orrington, Princeton, and Baileyville public libraries and at the Calais Free Library. An announcement of the public hearings was also printed in local newspapers.

2.1.1 Comment Process

The EPA Notice of Availability of the EIS published on August 26, 2005, began a 45-day comment period that ended on October 11, 2005. During the comment period, DOE held public hearings in Baileyville, Maine, on September 28, 2005, and in Brewer, Maine, on September 29, 2005. The time and location of the public hearings were posted in a "Notice of Availability" published by DOE on September 12, 2005, in the *Federal Register* (70 FR 53786), on the project Web site, and in local newspaper advertisements.

The hearings included a presentation by DOE, a question and answer period, and an oral comment session where attendees were invited to formally enter comments into the public record. Transcripts of the public hearing proceedings were recorded by a court reporter. This Comment-Response Addendum includes the transcript for the September 29, 2005, public hearing at Brewer. No public comments were presented at the September 28, 2005, hearing at Baileyville. Therefore, the transcript for that hearing is not included in this document.

2.1.2 Issues Raised during the Public Comment Process

This section presents an overview of the issues raised by the public and the general approach undertaken to respond to these issues. Three speakers presented comments at the public hearings, and DOE received six public comment letters.

The following issues were raised during the Brewer public hearing: (1) the salvaging of trees cut during ROW clearing; (2) the impact of the transmission line on property values, tax revenues, and easement rights; and (3) uprating the existing MEPCO line rather than constructing a new transmission line.

The following issues were raised in written comments by the USACE (Delgiudice 2005) on the Draft EIS: (1) secondary and cumulative impacts associated with regional ROWs and potential project-related ROW widening; (2) impacts on natural resources from alternating current (AC) mitigation; (3) the occurrence of vernal pools, potential impacts on them, and mitigation measures; (4) coordination with Native American Tribes and the Maine Historic Preservation Commission; and (5) consistency with the language of CWA Section 404(b)(1) guidelines.

The following issues were raised in written comments by the Maine Historic Preservation Commission (Shettleworth 2005) on the Draft EIS: (1) the need for additional consultation regarding existing architectural resources in new construction areas that may not have been previously surveyed or reviewed by the State Historic Preservation Commission, and (2) the language of the EIS should clearly indicate the need to consult for potential architectural resources, in addition to archaeological resources, in areas that have not been previously surveyed or reviewed by the Commission.

The following issues were raised in written comments by the EPA (Higgins 2005) on the Draft EIS: (1) the rationale for selecting the preferred alternative; (2) the distribution of, potential impacts to, and mitigation measures for individual wetland types along the ROWs; (3) the potential introduction and control of invasive species; (4) the occurrence and location of, potential impacts to, and mitigation measures for vernal pools along the alternative routes; (5) ROW maintenance techniques; (6) ROW management for wildlife habitat; and (7) ROW monitoring during and after construction for possible wildlife impacts.

An issue raised by Maritimes & Northeast Pipeline, L.L.C. (Maritimes) (Penney 2005) on the Draft EIS was that the AC mitigation for the M&N gas pipeline should be installed and functional before the proposed transmission line is energized.

The following issues were raised in written comments by the Maine Department of Inland Fisheries and Wildlife (MDIFW) (Bard 2005) on the Draft EIS: (1) the need to update Appendix D with regard to the distribution of the sedge wren, and (2) the lack of inclusion and evaluation of potential impacts on animal species listed by the State of Maine as special concern species, including two Maine invertebrate species that have been reported in the vicinity of the Modified Consolidated Corridors Route.

The following issues were raised by the U.S. Fish and Wildlife Service (USFWS) in a letter sent by the U.S. Department of the Interior (Raddant 2005) on the Draft EIS: (1) responsibilities of the USFWS as a cooperating agency; (2) aerial surveys for bald eagle nests; (3) mitigation measures for Atlantic salmon streams; and (4) information on the geographic range and spawning habitat locations of the Atlantic salmon. In addition, several issues were raised about the biological assessment (BA) included as an appendix in the

Draft EIS, similar to those received on the Draft EIS related to the bald eagle and Atlantic salmon.

Comments related to issues of property values, tax revenues, and easement rights were addressed by explaining why these issues are out of the scope of the EIS. Comments related to issues of cleared timber, widening existing ROWs, secondary impacts of AC mitigation, coordination among agencies, the use of CWA terminology, and uprating of the existing MEPCO line were addressed by identifying the relevant sections of the Draft EIS where these issues are discussed.

The response to the issue regarding the identification of the preferred alternative identifies the criteria and considerations DOE used to identify its preferred alternative. The responses to comments on impacts on wetlands and on the possible introduction of invasive species refer to and summarize the relevant sections of the Draft EIS that discuss such impacts and associated mitigation measures. The responses regarding vernal pools discuss potential impacts and offsetting mitigation measures relevant to these resources and provides additional text for the Draft EIS. Comments on ROW maintenance, habitat management, and wildlife monitoring are addressed through a combination of a review of the strategies and resultant plans for ROW maintenance presented in the Draft EIS and citations to relevant sections of the document. It was noted that installation of AC mitigation for the existing gas pipeline would be expected to occur before the NRI is energized.

Comments related to the need for additional architectural resource consultations were addressed by identifying the relevant sections of the Draft EIS where the need for such surveys and consultations are discussed. The response also points out that any such surveys would have to be approved by the State Historic Preservation Officer (SHPO) and, as appropriate, Native American Tribes before construction could proceed. The response also includes clarification of the existing text regarding additional survey and consultation needs, as well as the addition of new text identifying the potential need for on-site SHPO inspection. Comments related to the use of more recent species distribution information and the need to evaluate animal species that are listed by the State of Maine as species of special concern were addressed by incorporating current species distribution data and including species of special concern in the impacts evaluation.

The comment related to the USFWS's responsibility as a cooperating agency was addressed by describing DOE's responsibilities under Section 7 of the Endangered Species Act of 1973 (ESA). The response to the issues regarding bald eagle surveys and the geographic range and spawning habitat locations of the Atlantic salmon was to modify the Draft EIS to discuss the additional aerial surveys for bald eagle nests that the applicant would undertake and to update the information on the Atlantic salmon. Through the consultation process under Section 7 of the ESA, DOE has worked with the USFWS to address issues on the BA (Appendix F of the Draft EIS) for the bald eagle and Atlantic salmon and has submitted a revised BA for USFWS review and concurrence. DOE will complete the consultation process before issuing its ROD. BHE has worked with the USFWS to incorporate mitigation measures to minimize potential impacts on the bald eagle and Atlantic salmon from construction and maintenance of the NRI. The factual updates presented in the comments on the BA that pertain to the Atlantic salmon

were incorporated as changes to the Draft EIS and BA. These included the addition of information on known Atlantic salmon spawning near the proposed NRI and revised information on the Atlantic Salmon Gulf of Maine distinct population segment (DSP). Also, the reasons for the endangered status of the Atlantic salmon Gulf of Maine DSP were revised, and the number of adults that returned from the sea for spawning were updated.

2.2 PUBLIC HEARING (ORAL) COMMENTS AND RESPONSES

This Comment-Response Addendum presents the oral comments received during the public hearing that was held in Brewer, Maine. The transcript for the Brewer public hearing is presented in its entirety on the left-hand pages, and individual comments are delineated by sequentially numbered sidebars within the margin of the transcript. DOE's responses to the individual comments appear on the facing right-hand page, along with the corresponding comment number.

2.3 WRITTEN COMMENTS AND RESPONSES

Written comment submittals are reproduced in their entirety on the left-hand pages, with individual comments delineated by sequentially numbered sidebars. Responses to the individual comments are provided on the facing right-hand pages; each response is denoted with the corresponding comment number.

BREWER PUBLIC HEARING TRANSCRIPT AND RESPONSES

DEPARTMENT OF ENERGY

(DOCKET NO. PP-89-1)

In Re: Application to amend Presidential Permit; Bangor Hydro-Electric Company

September 29, 2005

AGENCY: Office of Energy Delivery and Electricity Reliability

ACTION: Hearing of Draft EIS

BEFORE: Angella D. White, Notary Public, at Jeff's Catering, 5 Coffin Avenue, Brewer, Maine, on Thursday, September 29, 2005, beginning at 7:00 p.m.

DON THOMPSON & ASSOCIATES

Court Reporting

[This page intentionally blank.]

(This hearing was taken before Angella D. White, Notary Public, at Jeff's Catering, 5 Coffin Avenue, Brewer, Maine, on Thursday, September 29, 2005, beginning at 7:00 p.m.)

* * * * *

DR. PELL: If everybody would be kind enough to be seated, I would like to start the meeting, if I may.

I'm with the U.S. Department of Energy in Washington, Dr. Jerry Pell, from the office of the Electricity Develop Delivery and Energy Reliability. And my colleague on the right is Mr. Brian Mills who is with the office of NEPA Policy and Compliance. NEPA is the National Environmental Policy Act. And his office of NEPA Policy and Compliance is within the office of Environmental Safety and Health in the Department of Energy also in Washington.

The reason we're here this evening is to take public comments on a draft Environmental Impact Statement, which is that white document that you all saw as you came in this evening.

That's a description of the potential environmental impacts on the project that Bangor-Hydro Electric has proposed that has been referred to as the Northeast Reliability Interconnect.

[This page intentionally blank.]

Before we go any further, I'd like to know if anybody in the audience wishes to speak this evening on this report? Okay. Thank you.

By way of background, I'm going to read you a little bit from the introduction to the document. I can read it fairly because I helped write it. So it's okay for me to read it in this way. I'll make sure I don't leave anything out.

The Department of Energy Presidential Permit is required before anyone can conduct, connect, operate, and maintain an electric transmission line across the U.S. border. On September 30, 2003, Bangor Hydro-Electric Company applied to the DOE to amend their existing Presidential Permit 89 to authorize Bangor Hydro to construct an 85-mile long, single circuit, 345,000-volt alternating current electric transmission line that would originate at the Orrington Substation and extend eastward to the U.S.-Canada border near Baileyville, Maine, and continue into New Brunswick.

The currently proposed transmission line is along a different route from that for which DOE issued the original Presidential Permit 89 to Bangor-Hydro on the 22nd of January 1996.

The Department of Energy has determined that the

[This page intentionally blank.]

issuance of an amendment of an existing Presidential Permit for this project would constitute a major federal action within the meaning of NEPA, the National Environmental Policy Act, as amended. The act originally was signed into law in 1969.

There was a Federal Register Notice of Intent to prepare an EIS and to conduct public scoping meetings and notice of floodplain and wetlands involvement. That was published on November the 2nd of 2004.

DOE held public meetings on November the 17th, 2004 in Baileyville, where we were again last night, and on November 18, 2004 right here in this same facility in Brewer. DOE also solicited written and electronic comments on the scope of the EIS in that Federal Notice of Intent at the scoping meetings and electronically through a project website.

The EIS addresses the environmental impacts of the proposed transmission -- excuse me, of the proposed transmission line and the range of reasonable alternatives. Four alternative transmission line routes are analyzed in this EIS. The Modified Consolidated Corridors Route is Bangor-Hydro's and also DOE's preferred alternative.

DOE will use the EIS to ensure that it has the information needed for purposes of informed decision

[This page intentionally blank.]

making. The decisions themselves will be issued subsequent to the final EIS -- what we have here, I remind you, is the draft -- in the form of a Record of Decision by DOE no sooner than 30 days after publication of the US Environmental Protection Agency Notice of Availability of the final EIS. And that would be followed by an amendment to the Presidential Permit, as appropriate.

We at this juncture cannot tell you whether or not a Presidential Permit would be granted. The Department of Energy invited interested members of congress, state and local governments and other federal agencies, American Indian tribal governments, organizations and members of the public to provide comments on the draft.

The public comment period began on August the 26th with the publication of the notice of availability of the draft EIS in the Federal Register by the Environmental Protection Agency and will continue until October 11th, 2005.

So if anybody wishes to submit comments beyond tonight, you do have until October the 11th. Written and oral comments will be given equal weight. And DOE will consider all comments received or postmarked by that date in preparing the final EIS. Comments

[This page intentionally blank.]

received or postmarked after that date will be considered to the extent practicable.

So that's my way of setting the stage and background to our being here this evening. And I'd like to start now by taking comments. I believe we have two people that would like to speak. I'll just take them in the order of where you're sitting, the first person -- well, okay, you've got it.

Do me a favor, please, and tell us your name and affiliation so that we can have it in the record.

MR. MACDONALD: John MacDonald, republican.

DR. PELL: Let me give you this. We are -- we will try to keep remarks down to about five minutes, if we can.

MR. MACDONALD: John Macdonald.

DR. PELL: Do you want to take this?

MR. MACDONALD: Yes, okay. Republican. I want to know how much trees are going to be removed from my land. When they first did it in the '70s, they devastated and burnt all the wood that could have been utilized for paper, lumber, anything.

JoM-1

Now, this time I want to know where they -- they're coming in. I know it's a 270-foot right-of-way, 1,400 and some feet. I want to know if they'll mark it so I can harvest the wood this time.

Response to JoM-1:

As discussed in Section 2.3.4.3 (page 2-28) of the Draft EIS, all vegetation cut during initial clearing would be cleaned up and disposed of in accordance with the Maine Slash Law. As part of land clearing operations, much of the merchantable wood materials (e.g., sawlogs and pulpwood) would be salvaged. The tops of trees, cull material, and branches could be chipped on site and the chips hauled to local power plants for use as fuel. In all instances, the easement agreements allow BHE to clear the ROW in accordance with applicable permit requirements (Sloan 2005b). Clearing would be contracted in large segments of the ROW, and the ownership of the wood would be transferred to the contractor to harvest and market as the contractor sees fit (Sloan 2005a).

JoM-1 (cont.)

I don't want to see it wasted, piled up and burnt, like they did the first time. Sir.

DR. PELL: No, I'll take it back, please.

MR. MACDONALD: Oh. I'm sorry.

DR. PELL: Quite all right. No problem. Thank you, Mr. Macdonald. I appreciate your comments and they will be part of the record and they will be included with the final document.

I'd like to now call on the second speaker. If we could, as we did for the first speaker, give your name and your affiliation, please, if you're a member of a group or whether you're just speaking for yourself.

MR. BLANCHARD: Ron Blanchard, resident of Eddington, Maine, a landowner, in which I will lose one acre of land on an easement which is assigned to

RB-1

MEPCO or MEDCO, Maine Electric Power, not Bangor Hydro. I want to make that very clear. The easement on my land and my neighbor's land is for Maine Electric Power Company, not Bangor Hydro.

At a meeting last night or the night before last in the town of Eddington the representative for Bangor

RB-2

Hydro, Mr. Steve Sloan, could not produce an easement, an authorization, any type of court document whatsoever that gave Bangor Hydro authorization to

Response to RB-1:

BHE must secure the necessary ROW for the NRI via negotiation with land or easement holders or under appropriate State or local laws that may facilitate rights acquisition for utility infrastructure. The issuance of a Presidential permit by DOE does not confer any real estate rights or right of eminent domain to BHE.

Response to RB-2:

Property taxes are a matter of local jurisdiction. Therefore, questions related to tax valuations and assessments should be referred to the local town or county tax assessor. If a Presidential permit is granted and the proposed line is constructed, BHE would be required to pay property taxes to each local taxing municipality based upon the value of the electrical facilities constructed within each municipality.

RB-2 (cont.)

come across my land, to steal my trees, to utilize my land in which I am paying taxes on, the land in which is my livelihood, in which the land is going to be down-graded in taxes. And so the town of Eddington is going to lose revenue because of this power line.

Bangor Hydro has yet to prove to me -- and, Dr. Pell, I was in Augusta at the PUC meeting and they could not prove then that they had a legal -- a legal right to come across my land.

RB-3

I have requested in the Town of Eddington that they hold any authorization up until Bangor Hydro can legally prove that they can come across my land or any of my neighbors' land, to give me fair compensation.

My easement, which was signed by a previous owner, was to Maine Electric Power, not Bangor Hydro.

What's next? L & G Power Plant coming through, Bangor & Aroostook Railroad going to come through next? What else is the assignees going to -- MEPCO --? This needs to be investigated.

When -- it was assigned by the previous owner for one power line, now it's two power lines. How about three, four? What's next? We're talking about fair compensation for the land.

RB-4

Now, let's just think a little bit about the tax value of the land going down. Would you like to live

Response to RB-3:

See the response to RB-1.

Response to RB-4:

See the response to RB-2.

RB-4 (cont.)

underneath the power lines? There's a member of the audience right over here -- where is Jim?

MR. MCDONALD: Right there.

MR. BLANCHARD: This is coming right over his house on a corner. I can point it out on the map.

MR. MCDONALD: I'll speak.

MR. BLANCHARD: Okay. He'll speak later. Nobody wants to sell -- you cannot sell a house with power lines coming over it. When I bought my land or when he bought his, there was not but one power line there. Now we're talking two? Is there going to be three, four? Gas lines?

What legal right -- let's talk about legality now. Is it legal for MEPCO to sell an easement? Is -- is that the state law? Has Bangor Hydro produced the legal right to me, which I've requested in the last year, that the -- a legal right signed by a judge? No, they have not.

RB-5

They have not produced the legal right in the court of law that they have the legal right -- Bangor Hydro, not MEPCO -- they haven't produced it yet. They didn't produce it when they went before the PUC. They didn't produce it in Eddington two nights ago. Now, maybe they can tonight and shut me up.

Now, I'm not here to stop the electrical power to

Response to RB-5:

See the response to RB-1.

Boston. Because that's exactly where it's going. But we all know that. I mean, you go to Orrington, that's all going to New York. Well, that's fine. They've got -- but they're coming across my land and they're not giving me fair compensation.

They're not giving me a discount on my electrical rates. They're coming across my land, the land I pay taxes on, not Bangor Hydro. Oh, MEPCO pays a little taxes for the posts. But I can't sell that land. I can't -- I pay taxes on it, I can't do nothing with it. I can't cut it off, do nothing.

We're not here to stop progress. We know the poor people down in Boston need electricity. I mean, they're beautiful people down there.

But when I was down to -- in Augusta and talked to the PUC and says, how about redesign the electrical power lines so they don't have to cut another acre of land? And I think the number of 55,000 acres -- 55,000 acres, that's what they're going to encompass. 55,000 acres of lower tax revenue for the communities.

I said, why don't you just take and redesign the power lines so we don't have to cut another tree, so we don't have to downgrade the tax assessed values? No, they didn't want to hear that.

RB-6

RB-7

Oh, and the mention was that the Bangor Hydro --

Response to RB-6:

Section 2.2.2.3 (page 2-14) of the Draft EIS addresses uprating of the existing MEPCO line and why it was dismissed as a viable alternative. Also, see the response to RB-2 regarding the tax assessment issue.

Response to RB-7:

See the responses to RB-1 and RB-2.

people that are buying power from Bangor Hydro have to cough up $100 million to finance this line. And the poor landowner, such as myself and my neighbors, have absolutely no compensation. We get our trees stolen away from us, the land in which we have no tax assessed -- the tax assessed value on our land goes down.

RB-7 (cont.)

I am currently requesting the Town of Eddington to have the -- the land in which they are going to put the power line on to have it reassessed. And I am going to request that Bangor Hydro pay the taxes on it because it's absolutely worthless to me.

And it's just not right, Dr. Pell. It's not right. I pay taxes on the land and Bangor Hydro gets to take my trees and sell power to Boston and make money for their shareholders and I receive not one iota of compensation, not one cent off my electrical bill. And, in fact, my electrical rates go up to pay for that.

RB-8

This is all in the PUC Commission. My rates go up and I lose land -- lose the value of my land? I'm sorry, it's not right, it doesn't pass a common sense test.

RB-9

They need to renegotiate with the landowners, not the towns, because they don't have an easement. You

Response to RB-8:

Issues related to electrical rates and billing are out of the scope of the EIS. The rates are established through State regulatory proceedings, and the results of those proceedings are too speculative to consider in an EIS.

Response to RB-9:

Any decrease or increase in property values from the proposed transmission line would be a perception-based impact, that is, an impact that does not depend on actual physical environmental impacts resulting directly from the proposed project, but rather upon subjective perceptions of prospective purchasers in the real estate market at any given time. Any connection between public perception of a risk to property values and future real estate values would be uncertain or speculative at best, and therefore would not inform decision making. Thus, estimating impacts on real estate evaluations is out of the scope of the EIS. DOE has not attempted to quantify public perceptions of property values should the proposed project be built.

have to make it right here. Do we want 55,000 acres of American land destroyed -- state of Maine land destroyed so Boston can get electricity? No, I'm sorry. Thank you for your time.

DR. PELL: Thank you very much. I appreciate your comments and they will be part of the record and we will consider them in our preparing of the final document.

Is there anybody else with us this evening that wishes to talk? Please come to the microphone and tell us who you are.

MR. MCDONALD: Thank you. My name is Jim Mack.

DR. PELL: Can you spell that? M-a-c-k?

MR. MCDONALD: M-c-D. And I'm not from Canada, so I don't really have interest in Enron or whoever it is, whatever. But you're going right in front of my house.

In 1989 when they first come through with this, with the first draft, whatever, I didn't fight them, but I was questioning just like I am right now. And the need and the ability for how they went about it, it just needs to be questioned.

Because, you know, we -- we're just human beings, you know. It doesn't matter. But if you're going to drive something down your throat that you've got to

JiM-1

Response to JiM-1:

See the response to RB-9.

JiM-1 (cont.)

live with --. I mean, who wants to buy my place with two places -- I mean, two poles -- two -- a million volts or whatever it is? They just didn't go about it right.

And I'm not going to make a long story out of this. There's a lot more questions that should be done, just do permits. Because at the time I said, why don't you put the old on the new and the new on the old? Oh, that's going to cost me $100,000. Well, excuse me, you know.

Here we go, everything down the line. It's the buck. And that's the bottom line of this whole damn thing. And it's not good.

Now, we can go down to New Orleans, you know, where's the buck or we can drive it right here. Now, that's -- that's life, I guess. And whatever you people decide, however it goes. It makes me sad, really, you know. I can go to Labrador and look at all the stuff, I can go to Canada and look at all the good stuff, but right here it's no good.

I don't know if I've got any more to say. Thank you.

DR. PELL: Thank you very much. And your remarks have been recorded and they will be part of the record for the final document. Is there anybody else that

[This page intentionally blank.]

wishes to contribute this evening? This is a -- it's an open public meeting. If you have something to say, we'd be delighted to hear you say it.

Okay. I see no hands. I want the record to show, please, that there were no additional requests to speak at this time. And, therefore, I will adjourn the meeting. And we will end the formal part of tonight's proceeding. And if any of you wish to stay and chat informally with us or with the utilities, we're not going to run away, we'll stay here a little while.

So with that I hereby -- yes, sir.

MR. BLANCHARD: I was just wondering if you were open to questions, sir?

DR. PELL: After we're off the record.

MR. BLANCHARD: Off the record, yes, sir. Thank you.

DR. PELL: So at this point I would like to officially close out the record. Thank you all for coming on a rainy night. I appreciate your thoughts and we're glad to have you with us and we're glad to be here in Maine.

(Concluded this hearing at 7:21 p.m. this date.)

[This page intentionally blank.]

CERTIFICATE

I, Angella D. White, a Notary Public in and for the State of Maine, hereby certify that on September 29, 2005, said hearing was stenographically reported by me to the best of my ability and later reduced to typewritten form with the aid of Computer-Aided Transcription, and the foregoing is a full and true record of the testimony given by the witness.

I further certify that I am a disinterested person in the event or outcome of said hearing.

IN WITNESS WHEREOF, I subscribe my hand and affix my seal this 6th day of October 2005.

_____
ANGELLA D. WHITE, NOTARY PUBLIC
Court Reporter

My commission expires
May 17, 2010

WRITTEN COMMENTS AND RESPONSES

DEPARTMENT OF THE ARMY
NEW ENGLAND DISTRICT, CORPS OF ENGINEERS
696 VIRGINIA ROAD
CONCORD, MASSACHUSETTS 01742-2751

REPLY TO
ATTENTION OF:
Regulatory Division
CENAE-R-51

September 7, 2005

Dr. Jerry Pell
Office of Fossil Energy, FE-27
US Dept. of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Dr. Pell:

This concerns the application by Bangor Hydro-Electric Company (BHE) to construct a new 345 kV electrical transmission line from Orrington, Maine to New Brunswick, Canada, crossing to the east of Baileyville, Maine. The project has been named the "Northeast Reliability Interconnect" by BHE.

As you are aware, the Corps approved a similar project in 1995 that was never built. The previous permit expired and is no longer valid. We have therefore been actively engaged with the applicant and an interagency team since 2003 in the pre-application planning for the latest project. Much like they did in the past, the Dept. of Energy (DOE) has assumed "lead agency" role under NEPA and intends to prepare an Environmental Impact Statement (EIS) for the project.

We thank you for the opportunity to participate in the preparation of the EIS. Since you've given us the choice, we elect to be a commenting agency. This is due chiefly to the minimal amount of work that is subject to Corps jurisdiction and it is the same role we adopted for the past NEPA review. In addition to providing general comments on the DEIS, the Corps is available to answer any specific questions that DOE may have regarding navigation, wetland delineation and functional assessment, analyzing alternatives, and compensatory mitigation.

We have completed our review of the DEIS and have prepared the attached comments. Applicable section numbers are included for your reference. In general the document is well written and organized and provides an excellent overview of the project needs and alternative strategies for addressing those needs. The Corps looks forward to continued coordination with your agency as well as the interdisciplinary review team as project planning continues.

[This page intentionally blank.]

-2-

If you have any questions concerning this matter please contact Jay Clement of my staff at 207-623-8367 at our Manchester, Maine Project Office. The Project Office address is US Army Corps of Engineers, 675 Western Avenue #3, Manchester, Maine, 04351.

Sincerely,

Jay L. Clement

for Frank J. Delgiudice
Chief, Permits & Enforcement Branch
Regulatory Division

Copies Furnished:
Beth Alafat – US EPA
Wende Mahaney – USFWS
Sean McDermott – NMFS
Jeff Murphy – NMFS
Jessica Bulloch – ME DEP

[This page intentionally blank.]

CORPS OF ENGINEERS COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
FOR THE NORTHEAST RELIABILITY INTERCONNECT PROJECT

USACE-1 1. Section S.1.2 & Section 1.1. These sections can also refer to the past Corps of Engineers permit. The original permit, number 199010732, was issued on January 10, 1995 and expired December 31, 2002.

USACE-2 2. Section S.2.2 & Section 1.2.2. The Corps defines the basic project purpose as required by the EPA 404(b)(1) Guidelines. This is often different than the purpose and need statement required under NEPA. In this case, we believe the basic project purpose is to increase the reliability and capacity of the existing bulk electric transmission system between Maine and New Brunswick, Canada.

USACE-3 3. Section S.3.1 & Section 1.3.1. You may identify the Corps as a commenting agency as previously noted in our letter.

USACE-4 4. Section S.4 & Sections 2.1.1 & 2.2. The Corps concurs that DOE has identified a reasonable scope of alternatives. We recommend that alternatives be dismissed using the language of the 404(b)(1) guidelines. Our goal is to ensure that your NEPA document satisfies the Corps requirements under the guidelines in order to avoid duplication of effort in our permit process. It would be ideal if you summarized your discussion of alternatives in terms of their practicability and environmental impact. The term "practicable" is defined as available and capable of being done after taking into consideration cost, logistics, and available technology in light of overall project purpose (40 CFR 230.3(q).

USACE-5

USACE-6 5. Section S.5.6. This section doesn't clearly indicate that you coordinated with Maine's Indian Tribes as well as the Maine Historic Preservation Commission. Subsequent sections confirm that you did but it would be helpful to add it to the summary section(s). If a written effect determination has been received, it should be noted in the EIS document.

USACE-7 6. Section S.6 & subsequent sections. A typical secondary/cumulative impact with utility projects has been termed "sweetening" of the rights-of-way. This generally means the cumulative effect of an ever widening cleared right-of-way with associated impacts to natural resources, aesthetics, and other public interest factors. As such, the EIS should acknowledge the effect of the existing rights-of-way on the environment of the region and how the various alternatives change that effect.

USACE-8 In terms of secondary impacts, the EIS should identify the probable impact of the AC Mitigation work to be proposed under separate cover by Maritimes. Although no streams will be impacted by this work, it is highly likely that wetlands previously impacted and then restored by Maritimes will be again impacted by AC Mitigation work.

Response to USACE-1:

Footnote b of Table 9-1 on page 9-2 of the Draft EIS has been modified to refer to the past USACE permit.

Response to USACE-2:

DOE agrees with this statement. As stated in Sections S.2.1 (page S-3) and 1.2.1 (page 1-3) of the Draft EIS, the purpose and need for DOE's action is to respond to BHE's request to amend Presidential Permit PP-89. BHE's stated purpose and need, as described in Sections S.2.2 (page S-5) and 1.2.2 (page 1-5) of the Draft EIS, is to improve the reliability and stability of the bulk transmission system of the Maritimes area of Canada and New England, increase the import-export capacity between Maine and New Brunswick, and reduce transmission line losses in the overall regional system.

Response to USACE-3:

The comments received from Federal agencies are acknowledged in a manner similar to all other comments received on the Draft EIS. The issues raised in the USACE comment letter are presented in Section 2.1.2 of this Comment-Response Addendum. Changes made to the Draft EIS in response to USACE comments are summarized in the response and presented in Chapter 3.

Response to USACE-4:

None of the four primary alternative routes are dismissed in the EIS. DOE could choose to grant the amendment to Presidential Permit PP-89 for any one, two, or three of the new alternative routes (Modified Consolidated Corridors Route, Consolidated Corridors Route, and MEPCO South Route) (see Chapter 2 of the Draft EIS). DOE may also decide to rescind the permit. DOE's decision regarding the amendment of the Presidential permit and a selected alternative (if the amendment is granted) will be identified in the ROD. Other alternatives, including several alternative routes, were considered but dismissed in Section 2.2 (page 2-11) of the Draft EIS as being impracticable for various reasons.

Response to USACE-5:

DOE believes that the Draft EIS does summarize the discussion of alternatives in terms of practicability and environmental impact. DOE considers each of the four primary alternative routes as practicable. The impacts identified for each of these alternative routes are summarized in Tables S-4 (page S-39) and 2.5-1 (page 2-53), and summary discussions are provided in Sections S.5 (page S-30) and 2.5 (page 2-45) of the Draft EIS. These discussions, as well as the more detailed impact evaluations presented in Chapter 4 and the mitigation measures described in Section 2.4 (page 2-37) of the Draft EIS, use the term "practicable" as appropriate.

[This page intentionally blank.]

Other alternatives, including several alternative routes, were considered but dismissed in Section 2.2 (page 2-11) of the Draft EIS as being impracticable for various reasons.

Response to USACE-6:

Section S.5.6 (page S-35) of the Draft EIS has been modified to indicate that cultural resources coordination and consultations occurred with the Maine Historic Preservation Commission (MHPC) and Maine's Native American Tribes.

Response to USACE-7:

The Draft EIS identifies the potential impacts that might be incurred from the construction and operation of a new transmission line for each alternative route. While not using the term "sweetening," the analysis presented in the Draft EIS acknowledges impacts associated with the widening of existing ROWs. For example, Section 3.5.1.1 (page 3-15) of the Draft EIS identifies the disturbance of terrestrial vegetation within existing ROWs from vegetation maintenance practices, while Section 4.5.2.1.1 (page 4-14) of the Draft EIS discusses the potential for habitat impacts due to expansion of the ROW width. The evaluation of cumulative impacts presented in Section 8.2 (page 8-2) of the Draft EIS considers the effects of existing ROWs in the region and points out which resources could incur incremental impacts from the proposed action and discusses impacts from new and co-located ROWs.

Response to USACE-8:

Potential impacts of AC mitigation on wetlands are presented in Section E.6 of Appendix E of the Draft EIS (see the last paragraph of page E-12). This discussion has also been added to Sections S.5.5 (page S-35) and 4.5.2.1.7 (page 4-25) of the Draft EIS.

USACE-9 7. Sections 2.3.3, 2.3.4, & 2.3.4.5. These sections should specifically note whether aquatic and other natural resources will be impacted or not. According to the applicant, this is unlikely at the substation or the staging areas but probably will occur for AC Mitigation.

USACE-10 8. Section 8.1. The discussion of Phase IV of the Maritimes project should be updated to reflect their current proposal. As of 9/2/05 work along that area of the pipeline was expected to include up to 51.1 miles of looping line and one new compressor station.

USACE-11 9. General. There is no discussion of vernal pools in the document. As you know, vernal pools are naturally occurring, intentionally created (mitigation), or accidentally created temporary or permanent bodies of water occurring in shallow depressions that fill in the spring and fall and may dry in the summer. Vernal pools have no permanent or viable populations of predatory fish and as such, provide the primary breeding habitat for numerous frogs, salamanders, and fairy shrimp. They also provide habitat for other wildlife including several endangered and threatened species. Vernal pools can be directly impacted by temporary or permanent access and indirectly impacted by clearing, herbicide application, and degradation of critical edge habitat. In some cases, loss of the critical edge habitat, often composed of uplands as well as wetlands, can completely eliminate the habitat value of the pool. The applicant should note whether vernal pools were identified within the proposed right-of-way and discuss proposed actions to avoid/minimize impacts to these resources and surrounding habitat.

Response to USACE-9:

Sections 2.3.3 (page 2-22), 2.3.4 (page 2-27), and 2.3.5 (page 2-33) of the Draft EIS describe substation alterations, transmission line construction (including staging areas), and AC mitigation, respectively. These sections are not meant to present impact analyses. Potential impacts on aquatic and other ecological resources are presented in Section 4.5 (page 4-14) and Appendices E, F, and G of the Draft EIS. In particular, potential impacts of AC mitigation on wetlands are presented in Section E.6 of Appendix E (see page E-12) and have also been added to Sections S.5.5 (page S-35) and 4.5.2.1.7 (page 4-25) of the Draft EIS (see the response to USACE-8).

Response to USACE-10:

The configuration for Phase IV of the Maritimes project is still in the design mode; thus, it is too speculative to analyze the cumulative impacts of this project with any degree of confidence. The information currently presented in the Draft EIS (Section 8.1, page 8-2) was based on the distance of the Phase IV project that could occur within the Stud Mill Road area, and that therefore would be close to the proposed NRI.

Response to USACE-11:

Additional text has been provided to Section 3.5.3 (page 3-21) of the Draft EIS to discuss the importance of vernal pools and the potential for these habitats to occur within and along the alternative ROWs. Additional text also has been provided to Section 4.5.2.1.7 (page 4-25) of the Draft EIS that addresses the potential impacts on vernal pools from the proposed project. See also the response to EPA-9.

MAINE HISTORIC PRESERVATION COMMISSION
55 CAPITOL STREET
65 STATE HOUSE STATION
AUGUSTA, MAINE
04333

JOHN ELIAS BALDACCI
GOVERNOR

EARLE G. SHETTLEWORTH, JR.
DIRECTOR

September 28, 2005

Jerry Pell, Ph.D., CCM Project Manager
Office of Electricity Delivery and Reliability, OE-20
U.S. Department of Energy
Washington, DC 20585

Project: MHPC #2270-03 - NE Reliability Interconnect (Draft EIS); Bangor Hydro-Electric
Towns: Orrington, ME to Baileyville, NB

Dear Dr. Pell:

In response to your recent request, I have reviewed the Draft EIS for the above referenced project pursuant to Section 106 of the National Historic Preservation Act.

MHPC-1

While the Draft EIS is acceptable in most respects, we request that it address the potential need to consult to identify, and assess potential effects to, any existing architectural resources within the APE of new construction associated with the project that may not have been previously surveyed or reviewed by this office. Our office has consulted on the Modified Consolidated Corridors Route, and has indicated that this corridor will not affect historic properties [architectural or archaeological]. However, we have not consulted to identify architectural resources that might be within the APE for other aspects, and alternative corridor routes, related to the project.

MHPC-2

Other aspects of the project addressed in the EIS that may require further consultation or documentation regarding potential architectural resources include the divergence of the Consolidated Corridors Route from the Modified Corridors Route (section 4.6.2.1.1; Figure 2.1-4), the MEPCO South Route, temporary access road construction (section 4.6.2.1.2), any substation alterations that have not been previously reviewed (section 4.6.2.1.3), and any staging area construction (section 4.6.2.1.4) that has not been previously reviewed. While the Draft EIS adequately addresses concerns for archaeological resources within these sections, we request that the language be edited to clearly include the need to consult for potential architectural resources as well. Even in instances where there may be no standing structures within the APEs, documentation and completion of the consultation process is necessary for the Department of Energy to fulfill its Section 106 responsibilities.

We understand that consultation for some or all of these aspects of the project may not be necessary if alternatives requiring these undertakings are not utilized. Please contact Mike Johnson of my staff if we can be of further assistance in this matter.

Sincerely,

Earle G. Shettleworth, Jr.
State Historic Preservation Officer

cc: Jay Clement, US ACOE

PHONE: (207) 287-2132

FAX: (207) 287-2335

Response to MHPC-1:

As discussed in Section 4.6.2.1.1 (page 4-37) of the Draft EIS, if the NRI would be constructed along the Consolidated Corridors, Previously Permitted, or MEPCO South Routes, a cultural resource survey would need to be conducted for those areas that have not been previously surveyed. The results of the surveys would have to be approved by the SHPO and, as appropriate, in consultation with Native American Tribes before the project would be constructed.

Response to MHPC-2:

As defined in Section 3.6 (page 3-25) of the Draft EIS, cultural resources include both archaeological sites and historic structures and features (i.e., architectural resources). Therefore, where it is stated in Sections 4.6.2.1.1 (page 4-37), 4.6.2.1.2 (page 4-37), 4.6.2.1.3 (page 4-38), and 4.6.2.1.4 (page 4-38) of the Draft EIS that cultural resource surveys may be necessary, this implies surveys for both archaeological and historic structures and features. Nevertheless, to clarify this point, the language in these sections has been edited as requested in the comment. In addition, a statement has been added to these sections to mention that if cultural resources are unexpectedly encountered, the applicant would need to have an on-site inspection by the SHPO to determine if avoidance or other mitigation of the resource would be required.

OCT-07-2005 15:26 P.02

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

OFFICE OF THE
REGIONAL ADMINISTRATOR

October 7, 2005

Dr. Jerry Pell, Project Manager
Office of Electricity Delivery and Energy Reliability, OE-20
U.S. Department of Energy
Washington, DC 20585

Re: Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect, CEQ # 20050347

Dear Dr. Pell:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act we have reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Bangor Hydro-Electric Company Northeast Reliability Interconnect project proposed by the Bangor Hydro-Electric Company (BHE) in Hancock, Penobscot, and Washington Counties, Maine.[1]

According to the DEIS, the BHE proposal entails the construction and operation of an 85 mile long single circuit, 345,000 volt (345-kV) alternating current (AC) electric transmission line. The line would originate at the Orrington Substation and extend eastward to the U.S.-Canada border near Baileyville, Maine and then would continue into New Brunswick, Canada. According to the DEIS, the project would enhance the sharing of generation capacity between the Maritimes and New England, reducing requirements for reserve generation, increasing the reliability of the overall transmission system and facilitating expanded exports of energy to the Maritimes from the New England Power Pool.

Four alternative routes, including the applicant's preferred transmission line route, are evaluated in detail in the DEIS including: the Modified Consolidated Corridors Route (MCCR)–BHE's proposed action and DOE's preferred alternative; the Consolidated Corridors Route (CCR); (3) alternative three, the previously permitted route; and the MEPCO South Route. All of the routes originate and end at the same locations, namely the Orrington Substation and the crossing of the St. Croix River near Baileyville. Also, the initial 12.2 miles from the Orrington substation would be identical for all four routes. EPA agrees that the DEIS presents a reasonable range of alternative routes. Based on the information provided it appears that the MCCR or CCR alternatives have the potential to qualify as the least environmentally damaging practicable

[1] EPA New England (EPA) plans to submit additional formal Clean Water Act Section 404 comments in response to the Corps of Engineers' public notice.

[This page intentionally blank.]

alternative (LEDPA). The DEIS includes a list of permits that will be required for this project which includes a Section 404 Clean Water Act permit from the US Army Corps of Engineers (Corps). A public notice for this project was issued by the Corps on September 20, 2005. However, because the information presented in the public notice is inconsistent with what is presented in the DEIS, the Corps plans to issue a revised public notice.

EPA-1

A Section 404 permit was issued to BHE in January 1995 for a transmission line alignment along the Stud Mill Road route that would have impacted approximately 2.5 acres of wetland and would have created 71 miles of new right of way from Baileyville to Bradley Maine. The project impacts to wetlands would have resulted from the construction of permanent and temporary access roads. EPA and the US Fish and Wildlife Service (FWS) provided comments on the project in November 1991. The 1995 federal Section 404 permit expired prior to the project being constructed. In 1999 Maritimes and Northeast Pipeline, L.L.C. constructed a natural gas pipeline in the same general area as the Stud Mill Road route proposed by BHE. According to the DEIS, in 2001 in response to a BHE request for a State permit extension for the project, the Maine Board of Environmental Protection indicated a preference for BHE to modify the transmission line route to develop a route that would more closely follow the established linear corridors including the recently constructed gas pipeline corridor. Those changes are reflected in the preferred alternative described in the DEIS.

The preferred alternative described in the DEIS consists of 15 miles of new right of way, 58 miles of clearing adjacent to the M&N gas pipeline and/or Stud Mill road and 12 miles of clearing adjacent to the existing MEPCO 345-kV transmission line. According to the DEIS the primary impacts to wetlands would occur where forested wetlands are cleared and replaced over time by scrub-shrub or emergent wetlands. The following wetland impacts are anticipated (by alternative):

- MCCR–70 acres of clearing out of 133 acres of wetland within the ROW
- CCR–53 acres of clearing out of 108 acres of wetland within the ROW
- Previously permitted Route--103 acres of tree clearing out of 152 acres of wetland within the ROW
- MEPCO south Route--73 acres of tree clearing out of 173 acres of wetland within the ROW

While the four alternative routes evaluated in the DEIS present both a reasonable range of alternatives for purposes of NEPA and an adequate number of options from which to determine a potential LEDPA under Section 404, it is unclear how the MCCR was selected as the preferred alternative. We recommend that the FEIS discuss the advantages and disadvantages associated with each of the alternatives considered and the rationale for selecting the preferred alternative.

EPA-2

Response to EPA-1:

The inconsistencies involving the information presented in the public notice issued by the USACE and what is presented in the Draft EIS are related only to a difference in the naming of the alternatives routes. The preferred route identified by the applicant in its wetland permit application to the USACE is called the Consolidated Corridors Route. This route is referred to as the Modified Consolidated Corridors Route in the EIS. The applicant has been involved in consultations with the USACE to address the differences in route names used by BHE in its permit applications and by DOE in the EIS, and the USACE has indicated that its public notice will not be reissued (Clement 2005).

Response to EPA-2:

In a Presidential permit proceeding, the applicant, rather than DOE, proposes the project. In this event, DOE's proposed action and the range of reasonable alternatives in the EIS for the permit generally are consistent with the applicant's purpose and need and are both practicable and feasible.

State regulatory agencies generally have the responsibility for determining whether and where an electric transmission line should be built within a State. During the State permitting process, the Maine Board of Environmental Protection stated its preference for BHE to construct the proposed NRI along a route that would be more closely consolidated with established linear corridors (Draft EIS, Section 1.1, page 1-2). Therefore, BHE conducted a stakeholder outreach process during which it considered input from Federal, State, and local authorities; Native American Tribes; public interest groups; and other stakeholders on route alternatives (Draft EIS, Section 2.1.1, page 2-2). On the basis of input from this process and after considering other factors, including concerns expressed by the State and local authorities, local zoning and planning regulations, cost and engineering criteria, and environmental and land use considerations, BHE identified the Modified Consolidated Corridors Route as its preferred alternative, and the State of Maine ultimately issued a permit to BHE for construction of the NRI along this route.

Here, DOE has selected the Modified Consolidated Corridors Route as its preferred alternative for two reasons: first, because it is the applicant's preferred alternative and second, because the State of Maine has issued a permit to BHE for development of the NRI along that route. As it happens, this alternative also has the lowest impacts of all of the alternative routes.

DOE has provided discussion on its criteria and considerations in naming a preferred alternative in Section 1.4 (page 1-10) of this Comment-Response Addendum.

Chapter 4 of the Draft EIS presents the impact analyses for each of the alternatives considered in the EIS. A summary of the advantages and disadvantages of each alternative will be presented in the ROD to support DOE's decision. DOE will announce its final decision in the ROD and provide the basis for that decision.

EPA-3 The DEIS states that four wetlands of unusual significance occur along the MCCR that support rare and exemplary natural communities. While these systems are located outside the right of way, we recommend that the FEIS describe specific mitigative measures, such as the establishment of protective buffers to ensure that they will be protected from potential indirect and cumulative impacts associated with the powerline. For example, the locations of temporary access roads should be clearly identified relative to these unique wetland areas and a discussion provided to explain how the wetland ecosystems will be protected from indirect impacts associated with the temporary roads.

The most significant impact on wetlands would occur in areas where forested wetlands were cleared and subsequently converted to scrub-shrub or emergent wetlands. For the MCCR a total of 34 support structures would be located within wetland areas. The DEIS describes mitigation measures that establish a buffer zone around wetlands where herbicide application would be prohibited. We recommend that the analysis be expanded to discuss the potential for the

EPA-4 introduction of invasive species and methods to control their spread as a result of the clearing.

EPA-5 This section should also, to the degree feasible, identify the forested wetland types within the corridor and include mitigative measures such as buffers to protect wetlands not associated with a stream corridor. The mitigative measures listed may help to limit indirect impacts to water quality within the wetland system but they do not mitigate for the loss of wildlife habitat. We also believe the FEIS should discuss how the new transmission line will be managed to provide habitat for the species identified in Appendix D. For example, the applicant may want to

EPA-6 consider creating a more gradual transition area within the ROW to minimize impacts to existing species and/or create a more diverse habitat mosaic to encourage other wildlife use. There may be locations along the route that could be enhanced with additional shrub or old field cover type (if currently maintained as meadow). The discussion of buffer zones as measure to avoid or

EPA-7 reduce indirect effects of clearing near wetlands should also be expanded in the FEIS. The FEIS should include a more thorough description of buffers (which may vary depending on the wetland community type described) adjacent to wetland areas. It would also be helpful if the FEIS includes specific illustrations that show where the wide variety of wetland types (i.e., inland

EPA-8 marshes, wet meadows, peatlands, shrub swamps and forested swamps (both deciduous and evergreen), forested floodplain wetlands, and vernal pools) are located in the project area. This information is necessary to assess the potential impacts of the proposed action and to determine the effectiveness of the mitigative measures proposed.

EPA-9 We believe the discussion of potential impacts on amphibians and reptiles on page 4-23 fails to capture the potential impacts of forest clearing adjacent to vernal pool habitat. We recommend that the location of potential vernal pools be identified along the project corridor and that mitigative measures be developed to help protect these habitats during construction and in association with the maintenance and operation of the corridor right-of-way. The analysis should

EPA-10 also discuss the increase potential for predation from clearing activities and the resulting loss of forest cover.

Response to EPA-3:

The potential for direct and indirect impacts on natural resources (including wetlands of unusual significance) was considered by the applicant throughout its development of the alternatives, design of the transmission line components, specification of buffer zones around sensitive natural communities, construction methods, and project scheduling. For example, wetlands were identified so that wetland crossings, where needed, would be located to minimize the span of the wetland crossing and avoid the more environmentally sensitive portions of the wetland. Also, much of the clearing and construction activities in the wetlands would be conducted in winter when the ground surface is frozen and vegetation is dormant, thus minimizing the potential for disturbing soil and vegetation. The mitigation measures developed by the applicant that are identified in Section 2.4 (page 2-37) of the Draft EIS include multiple measures that specifically target potential indirect impacts, such as those associated with potential runoff of herbicides to wetlands. For example, to minimize potential surface soil erosion and runoff into nearby surface waters or wetlands, areas disturbed by the establishment of new temporary access roads would be regraded to their original contours, seeded, and mulched upon completion of their use. In addition, the applicant would not need to construct any new access roads to construct the line along the Modified Consolidated Corridors Route and Consolidated Corridors Route alternatives. An existing access road crosses one of the identified wetlands of unusual significance. This access road is hard-packed soil that would not require any upgrades by the applicant. DOE believes that the applicant's planned mitigation measures would effectively minimize wetland impacts to the extent practicable.

Response to EPA-4:

The Draft EIS (Section 4.5.2.1.1, pages 4-15 and 4-16) discusses the potential for invasive species introduction and identifies specific invasive species that are of particular concern in Maine. The Draft EIS (Section 2.4.2, page 2-39) also discusses the development of practices such as cleaning of construction equipment in order to minimize the potential dispersal of seeds that may become stuck in tire treads or mud on construction equipment and be transported to new, potentially suitable habitats. Surface soil disturbance represents the primary avenue for invasive species establishment in areas that have established plant communities. Soil disturbance would primarily occur from support structure and AC mitigation installation, staging area and substation upgrades, and, if required, establishment of new access roads. To minimize the potential for invasive species becoming established in the NRI ROW areas, the Draft EIS identifies several mitigation measures (see Sections 2.4.2 [page 2-39] and 2.4.3 [page 2-42]) intended to stabilize disturbed areas and thus reduce the potential for invasive species establishment. These measures include leaving all ground-level vegetation and stumps in place after cutting, no grubbing or clearing of brush in support structure construction areas unless leveling of the area is required, the use of wide-track or balloon-tired vehicles in unfrozen wetlands, and the use of State-approved seed mixes (that support wildlife use) to restore disturbed areas. In addition, performing the majority of the clearing during the winter would minimize soil disturbance.

[This page intentionally blank.]

Response to EPA-5:

During alternative route planning, the applicant considered minimizing clearing in forested wetlands that are not associated with stream corridors. Regardless of the forested wetland type, vegetation management within the ROW would be aimed at minimizing contact of vegetation with conductors. Thus it would be necessary to remove or top all trees that are 8 to 10 ft (2.4 to 3.0 m) or taller for reliability requirements. Trying to maintain forested wetlands with differential vegetation height throughout the ROW would be unduly complicated and increase line reliability risks (Paquette 2005f). Section 2.4 (page 2-37) and Appendix E of the Draft EIS identify the requirements for wetland buffers as well as for mitigation measures such as siltation fences, erosion control measures, herbicide application constraints, and vehicle movement restrictions, that would minimize impacts on wetlands not associated with stream corridors. In addition, as much clearing and construction in wetlands as possible would be conducted in winter when the wetlands are frozen, thus reducing the potential for impacting wetland vegetation and disturbing wetland soils. DOE believes that the applicant's approach to managing forested wetlands within the ROWs would minimize impacts on these resources to the extent practicable.

Response to EPA-6:

The applicant's first priority of ROW management is protecting conductors to ensure the reliability of electric power transmission. Nevertheless, DOE believes the ROW management approach developed by BHE considers wildlife impacts to the extent practicable. The applicant developed construction and post-construction activities to minimize impacts on wildlife habitat during construction and to provide stable wildlife habitat during NRI operations (e.g., habitat that would require infrequent to no clearing). For example, to minimize impacts on wildlife habitat (such as deer wintering yards), siting of the transmission line by BHE was coordinated with the MDIFW, while restoration of disturbed areas within the ROW would use seed mixes (such as "Strut and Rut") that provide food for wildlife. The mitigation identified in Section 2.4 (page 2-37) of the Draft EIS addresses ROW clearing, restoration, and maintenance activities and includes measures that would minimize impacts on wildlife habitat to the extent practicable. Also see the responses to EPA-2 and EPA-4.

Response to EPA-7:

The siting, construction, and maintenance specifications developed by the applicant for the transmission line ROW considered indirect impacts on wetlands. Mitigation measures targeting indirect impacts on wetlands, including the use of buffer zones, are identified in Sections 2.4.1 (page 2-37), 2.4.2 (page 2-39), and 2.4.5 (page 2-44), while Section 2.3 (page 2-14) of the Draft EIS provides details regarding buffer zones during ROW clearing, construction, and post-construction. The mitigation measures address indirect impacts related to erosion and surface runoff, herbicide application, and vehicle traffic. Section E.7 (page E-14) of the wetland and floodplain assessment found in Appendix E of the Draft EIS also identifies a number of mitigation measures for minimizing indirect impacts on wetlands. These mitigation measures are also presented in Section 2.4 (page 2-37) of the Draft EIS. Also see the response to

[This page intentionally blank.]

EPA-3. DOE believes that the proposed mitigation measures would adequately minimize impacts on all wetland types to the extent practicable.

Response to EPA-8:

DOE believes that the Draft EIS, including the wetland and floodplain assessment presented in Appendix E, provides sufficient information to ascertain the nature and magnitude of wetland impacts that could be incurred with each alternative route. Including illustrations of the specific wetland types would not alter DOE's conclusions in the Draft EIS with regard to wetland impacts. The wetland assessment presented in Appendix E describes the basic wetland types that occur within ROWs (using the widely used classification system of Cowardin et al. 1979) and also identifies the dominant species associated with these wetlands. As discussed in Section 4.5.2.1.7 (page 4-25) and Appendix E of the Draft EIS, wetland impacts associated with the construction and maintenance of the proposed transmission line would generally involve the conversion of forested wetlands to scrub-shrub or emergent wetlands. This impact would result in a change in wetland type and not in loss of wetlands or wetland functions. In its siting of the route and the proposed placement of support structures, BHE took into account direct and indirect impacts on wetlands so as to avoid or minimize wetland impacts to the extent practicable. Thus, DOE has concluded that the applicant's proposed mitigation measures (summarized in Sections 2.4 [page 2-37] and E.7 [page E-14, Appendix E] of the Draft EIS) would be effective in minimizing wetland impacts.

Response to EPA-9:

It is not practicable to survey and identify the locations of all vernal pools within or adjacent to the alternative corridor routes. A number of conditions must be in place for a waterbody to be considered a vernal pool (such as being fishless and used by key amphibian species for reproduction). Without specific knowledge of how an individual pool could be affected, it would not be possible to identify appropriate mitigation measures. Long-term, pool-specific studies would be required to obtain this information. The use of buffer zones and the type of vegetation clearing that would occur during ROW construction and maintenance (see Section 2.4 [page 2-37] of the Draft EIS) would limit impacts on wetlands, including vernal pools, that are within or adjacent to the ROW. Potential impacts on vernal pools within the ROW during construction would be temporary (e.g., depending upon the size of the vernal pool, establishment of a scrub-shrub habitat surrounding the pool could establish conditions somewhat similar to a forested vernal pool). A total of 20 candidate vernal pools were identified during the wetland survey for the Modified Consolidated Corridors Route, and none of these pools would have support structures located within them (Paquette 2005d). The potential for impacts on vernal pools that occur within the ROW would be minimized because clearing and construction in wetlands would mostly occur in winter when the ground surface is frozen. Potential impacts due to ROW maintenance would be avoided or minimized through herbicide use restrictions in and around wetlands with standing water (see Section 2.4 [page 2-37] of the Draft EIS). Information on vernal pools has been added to Sections 3.5.3 [page 3-21] and 4.5.2.1.7 (page 4-25) of the Draft EIS.

[This page intentionally blank.]

Response to EPA-10:

In small vernal pools, predation may increase initially, but once scrub-shrub habitat is established, the pool inhabitants would likely be more protected than in a vernal pool within a forested habitat with minimal ground cover. Also, the vernal pools within the ROW would not be impacted by subsequent developments, and amphibian species may experience less impact than occurs in vernal pools contained within areas subject to commercial timber harvesting. This information has been added to Section 4.5.2.1.7 (page 4-25) of the Draft EIS. See also the response to EPA-9.

EPA-11 Additional discussion of right-of-way maintenance techniques in the FEIS would make the analysis of potential impacts more complete. In particular, it would be helpful to know: whether burning will be used, how often, and if fire lanes will be necessary; the types of cutting, chopping, or mowing equipment to be used and frequency of use; whether soil seeding and fertilization will be done; whether techniques will be used to control the vegetative species to enhance use of the corridor by local biota; and, the effects of maintenance techniques on plant life and wildlife habitat. We note the discussion of herbicide use during construction and

EPA-12 maintenance of the project in Appendix E and G of the DEIS and suggest that the recommendations provided be incorporated into the record of decision and other related state and federal permits for the project.

EPA-13 Finally, we note that a large diversity of wildlife species occurs in the project area because of the variety of habitat types present. Included are at least 45 species of mammals, 150 species of birds and 25 species of reptiles and amphibians. We recommend that the FEIS discuss how the power line will be monitored during and after construction to assess impacts to these species and to develop methods to alleviate any unforeseen adverse effects.

For the reasons discussed above, EPA has rated this EIS "EC-2-Environmental Concerns-Insufficient Information" in accordance with EPA's national rating system, a description of which is attached to this letter. We look forward to reviewing responses to the issues and concerns highlighted in this letter. Please feel free to contact me or Timothy Timmermann of EPA's Office of Environmental Review at 617/918-1025 if you wish to discuss these comments further.

Sincerely,

Elizabeth A. Higgins, Director
Office of Environmental Review

Attachment

Response to EPA-11:

DOE believes that sufficient discussion of ROW maintenance is already presented in the Draft EIS. The ROW maintenance techniques identified by the applicant are discussed in Section 2.3.6 (page 2-35) of the Draft EIS. This section includes discussions of ROW inspections, clearing cycles, use of buffers, hand and mechanical clearing, herbicide application, and selective cutting that would occur to ensure the reliability of electric power transmission. Additional information on ROW clearing is presented in Section 2.3.4.3 (page 2-28) of the Draft EIS; Table 2.3-3 (page 2-29) of the Draft EIS summarizes the maintenance cutting practices that would take place in different areas of a ROW (e.g., areas with no restrictions and within standard stream buffers). Mitigation measures to be used during ROW maintenance are presented in Section 2.4.5 (page 2-44) of the Draft EIS. The cleanup of cut vegetation would be accomplished in accordance with the Maine Slash Law. While some burning of slash may occur during initial ROW clearing, burning would not be used during subsequent periods of ROW maintenance. Additional details regarding ROW maintenance techniques may be found in the permit application submitted by BHE to the Maine Department of Environmental Protection.

Response to EPA-12:

DOE will consider these and all mitigation measures identified in the Draft EIS in reaching a decision on the proposed action. Any mitigation measures DOE believes are required would be identified in the ROD and incorporated by reference in a Presidential permit amendment, if granted. The mitigation measures identified in Section 2.4 (page 2-37) and Appendices E and G of the Draft EIS are also included within the applicant's State permit application. However, it is not within the scope of the EIS or the authority of DOE to dictate what mitigative measures are included in other Federal or State agency permits that the applicant is required to obtain.

Response to EPA-13:

No post-construction wildlife monitoring by the applicant is planned. However, line routing decisions and mitigation measures were developed by the applicant, in part, to minimize, to the extent practicable, impacts on wildlife during all phases of the proposed action (clearing, construction, operation, and maintenance). The ROW corridors were sited to avoid, to the maximum extent practicable, impacting significant wildlife habitats (e.g., wading bird and waterfowl areas, deer yards, and bald eagle nests) and important, unique, or sensitive natural communities or habitats (see Section 2.4.1 [page 2-37] of the Draft EIS). Mitigation measures protective of wildlife during ROW clearing and construction include avoidance of activities near active bald eagle nests, establishment of buffers around wetland and riverine habitats, walk-throughs by project staff and applicable third-party representatives of any clearing or construction areas near or in sensitive natural areas, and seasonal construction restrictions to minimize disturbance of nesting wildlife (see Section 2.4.2 [page 2-39] of the Draft EIS). Post-construction mitigation measures protective of wildlife and their habitats include the timely restoration of disturbed areas, revegetation using State-approved seed mixes that provide for wildlife use, the use of ball markers on shield wires at key water courses, herbicide use

[This page intentionally blank.]

restrictions, and the seasonal restriction of vegetation maintenance activities using motorized equipment in moderate- and high-value waterfowl and wading bird breeding and nesting habitats (see Section 2.4.5 [page 2-44] of the Draft EIS). The ROW corridor would be monitored by the applicant or its contractors to ensure that appropriate mitigation measures are implemented. Therefore, DOE believes that the mitigation measures and ROW maintenance practices developed by the applicant would minimize impacts on wildlife species during and after ROW construction to the extent practicable.

Summary of Rating Definitions and Follow-up Action

Environmental Impact of the Action

LO–Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC–Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3–Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

[This page intentionally blank.]

Maritimes & Northeast Pipeline

890 Winter Street
Suite 300
Waltham, MA 02451
(617) 254-4050
Fax: (617) 254-1580

October 11, 2005

Dr. Jerry Pell, Project Manager
Office of Electricity Delivery and Energy
Reliability, OE-20
U.S. Department of Energy
Washington, DC 20585

Via Electronic Mail

Re: DOE/EIS-0372
Draft Environmental Impact Statement for the
Bangor Hydro-Electric Company Northeast Reliability Interconnect (August 2005)
Comments of Maritimes & Northeast Pipeline, L.L.C.

Dear Dr. Pell:

In accordance with the Department of Energy's ("DOE") "Notice of Public Hearings" on the Draft Environmental Impact Statement for the proposed Northeast Reliability Interconnect Project ("Draft EIS") proposed by Bangor Hydro-Electric Company ("BHE"), Maritimes & Northeast Pipeline, L.L.C. ("Maritimes") hereby provides its written comments on the Draft EIS. The proposed DOE action in the Draft EIS is to amend BHE's existing Presidential Permit to allow construction along the "Modified Consolidated Corridors Route" of a single-circuit, 345,000-volt, electric transmission line that would cross the United States international border with Canada in the vicinity of Baileyville, Maine. The Draft EIS was prepared to evaluate the potential environmental impacts in the United States of the proposed action and the range of reasonable alternatives. Maritimes appreciates this opportunity to provide its comments on the Draft EIS and to explain its interest in this proceeding.

Maritimes is a limited liability company that, along with its Canadian pipeline affiliate, Maritimes & Northeast Pipeline Limited Partnership, owns and operates a high pressure natural gas delivery system that transports natural gas in international commerce from the tailgate of a processing plant near Goldboro, Nova Scotia, to the Canadian-United States border, and through the northeastern states of Maine, New Hampshire, and Massachusetts, with a terminus in Dracut, Massachusetts, and another terminus in Beverly, Massachusetts. Maritimes and Portland Natural Gas Transmission System share an undivided, joint ownership interest in approximately 101.3 miles of pipeline extending from Westbrook, Maine, to Dracut. The Federal Energy Regulatory Commission ("FERC") approved the United States portion of the original Maritimes Project in a series of orders in 1998 and 1999,[1] and Maritimes placed such facilities into service on March 10, 1999 (Phase I) and December 1, 1999 (Phase II), respectively. FERC approved Phase III of

[1] *Maritimes & Northeast Pipeline, L.L.C.*, 80 FERC ¶ 61,136 (1997) (Phase I); 84 FERC ¶ 61,130, *order on reh'g*, 85 FERC ¶ 61,120 (1998) (Phase II); 87 FERC ¶ 61,061, *order on reh'g*, 89 FERC ¶ 61,123 (1999) (amending the Phase I and Phase II certificates).

[This page intentionally blank.]

the Maritimes Project in a series of orders commencing in 2001,[2] and Maritimes placed Phase III into service on November 24, 2003. Since its original in-service date, the Maritimes system has been a reliable source of critically necessary natural gas supply for the Maritimes provinces of Canada and the New England region.

In connection with the operation and maintenance of the Maritimes pipeline system, Maritimes owns and maintains significant rights-of-way that extend the entire length of its pipeline route. Portions of this right-of-way are directly affected by BHE's Northeast Reliability Interconnect Project ("NRI"). Specifically, the proposed route for the NRI Project will, in certain places, be adjacent to, and in close proximity with, the Maritimes pipeline system. As a result, Maritimes must install the appropriate alternating current mitigation (the "AC Mitigation Facilities") (i) to protect the public and pipeline personnel as well as the pipeline itself under steady state operating conditions under power line fault conditions on its pipeline system, (ii) to safely accommodate the electrical effects of the proximate electrical transmission facilities, (iii) to comply with the regulations of the U.S. Department of Transportation ("USDOT"), (iv) to protect the integrity of the pipeline's cathodic protection equipment and other above-ground facilities, and (v) to ensure the continued efficient operation of the Maritimes system.[3] Accordingly, Maritimes' interest in the NRI project is to ensure that the appropriate AC Mitigation Facilities are installed and functional prior to energizing the NRI facilities.

The United States portion of the Maritimes pipeline system has been designed and is operated under the exclusive federal jurisdiction of the USDOT. In particular, the USDOT regulations require that "[w]here a pipeline is located in close proximity to electric transmission tower footings, ground cables or counterpoise, or in other areas where fault currents or unusual risk of lightning may be anticipated, it must be provided with protection against damage due to fault currents or lightning, and protective measures must also be taken at insulating devices." *See* 49 CFR § 192.467(f) (2005) (External Corrosion Control: Electrical Isolation).

Maritimes' representatives have been working cooperatively with BHE over the last two years to properly align the NRI facilities with respect to the existing Maritimes pipeline facilities and to develop an appropriate design for the necessary AC Mitigation Facilities. While the design is not finalized, it is anticipated that the AC Mitigation Facilities will consist of a buried zinc ribbon (or ribbons) substantially along the distance of the pipeline where the proposed NRI electric transmission facilities will parallel the existing Maritimes pipeline. In addition, electrical grounding facilities will be required to provide protection at Maritimes' existing above-ground facilities, such as valve sites and a compressor station at Baileyville, Maine. Maritimes is coordinating its final AC Mitigation Facilities design with BHE along with the anticipated

---

[2] *Maritimes & Northeast Pipeline, L.L.C.*, 95 FERC ¶ 61,077, *order granting certificate*, 97 FERC ¶ 61,345 (2001), *order amending certificate*, 99 FERC ¶ 61,277 (2002).

[3] In connection with the FERC certificate orders described above, Maritimes received authorization to construct, install, own, operate and maintain ancillary above-ground appurtenant facilities, including cathodic protection equipment, as well as mainline crossover and blow-off piping and valving, pressure regulating devices, gas metering equipment, and launchers, receivers and associated piping and valves for internal inspection instruments and cleaning devices, all as required for compliance with USDOT regulations.

[This page intentionally blank.]

M&N-1

installation schedule associated with this maintenance activity. In order to maintain the integrity and efficient operation of this existing critical energy delivery system and to ensure the continued protection of the public, Maritimes must have its AC Mitigation Facilities installed and functioning prior to the energizing of the NRI facilities proposed by BHE.

Once again, Maritimes appreciates this opportunity to provide its comments on the Draft EIS and to explain its interest in this proceeding. If you have any questions, please contact the undersigned at (617) 560-1383.

Sincerely,

William C. Penney, Jr.
Vice President and General Manager
M&N Management Company
Managing Member of
Maritimes & Northeast Pipeline, L.L.C.

cc: Robin McAdam (Bangor-Hydro Electric Company)
Director, Corporate Development
Emera, Inc.
1894 Barrington Street
Barrington Tower
Halifax, Nova Scotia B3J 2AB

Response to M&N-1:

DOE is aware that BHE and Maritimes have been working cooperatively to design AC mitigation for the M&N gas pipeline. It is expected that the AC mitigation for the pipeline would be installed by Maritimes before the NRI is energized.

STATE OF MAINE
DEPARTMENT OF INLAND FISHERIES & WILDLIFE
WILDLIFE DIVISION – REGION C
PO BOX 220
JONESBORO, MAINE 04648
Phone (207) 434 - 5927 FAX (207) 434 - 5923

John E. Baldacci
GOVERNOR

ROLAND D. MARTIN
COMMISSIONER

October 11, 2005

Dr. Jerry Pell
Office of Electricity Delivery and Energy Reliability
OE-20
US Department of Energy
Washington, DC 20585

Dear Dr. Pell:

These comments are in reference to the Bangor Hydro Electric Company's proposed Northeast Reliability Interconnect (NRI) transmission line from Baileyville, Maine to Orrington, Maine.

MDIFW-1

Appendix D, Table D-4, page D-39 contains incorrect or outdated information about the distribution of the Sedge Wren (*Cistothorus platensis*), a state listed Endangered Species. The table reports that Sedge Wren distribution is limited to "[s]cattered reports from the southern two-thirds of the State," and that records of Sedge Wren within the project area are from the 1990s. In fact, breeding Sedge Wrens were documented in August 2003 in Great Works Stream, approximately 2.4 kilometers from the Modified Consolidated Corridors Route of the proposed NRI corridor. Sedge Wrens were also observed in Sunkaze Meadows National Wildlife Refuge in July 2005, approximately 4.5 kilometers from the Modified Consolidated Corridors Route.

MDIFW-2

The text of section 4.5.2.1.8, page 4-26 states that, "This section evaluates the potential impacts on…species considered of special concern in Maine." However, the accompanying Table 4.5-4 does not list any birds, mammals, amphibians, reptiles or invertebrates considered by the State of Maine to be Species of Special Concern. The Modified Consolidated Corridors route crosses the Machias River in an area with known occurrences of Brook Floater mussels (*Alasmidonta varicosa*), a state Species of Special Concern (see Figure B.1-1j, page B-16). Additionally, the Modified Consolidated Corridors route passes within approximately 1 kilometer of a documented occurrence of the Ebony Boghaunter (*Williamsonia fletcheri*) in Baileyville (see Figure B.1-1n, page B-20). Ebony Boghaunter is a damselfly that is a state Species of Special Concern.

MDIFW-3

Thank you for your consideration of these issues.

Sincerely,

Richard Bard
Asst. Regional Wildlife Biologist

Response to MDIFW-1:

Table D-4 (Appendix D, page D-39) of the Draft EIS has been revised to incorporate the recent sedge wren observations in the project area.

Response to MDIFW-2:

Tables 4.5-4 (page 4-27 through 4-34) and D-4 (Appendix D, pages D-30 through D-41) of the Draft EIS have been modified to include animal species listed as species of special concern that may occur in the project area.

Response to MDIFW-3:

The modifications made to Tables 4.5-4 and D-4 of the Draft EIS, mentioned in the response to MDIFW-2, include the addition of the Brook Floater and the Ebony Boghaunter.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
408 Atlantic Avenue – Room 142
Boston, Massachusetts 02210-3334

October 31, 2005

ER 05/764

Dr. Jerry Pell
Office of Electricity Delivery and Energy Reliability (OE-20)
U.S. Department of Energy
Washington, DC 20585

Dear Dr. Pell:

The U.S. Department of the Interior (Department) has reviewed and provides the following comments on the Draft Environmental Impact Statement (DEIS) for the Bangor Hydroelectric Company (BHE) Northeast Reliability Interconnect to Amend Existing Presidential Permit to allow Construction Along the Modified Consolidated Corridors Route, Hancock, Penobscot, Washington Counties, Maine. The Presidential Permit PP-89 (issued January 22, 1996) authorized Bangor Hydro-Electric Company to construct a 345-kV electric transmission line that would cross the United States International Border in the vicinity of Baileyville, Maine. This letter provides the response of the U.S. Department of Interior's Fish and Wildlife Service (Service) pursuant to Section 7 of the Endangered Species Act (ESA), as amended (16 U.S.C. 1531-1543), and the Fish and Wildlife Coordination Act, as amended (16 U.S.C. 661-667d). The Service is a cooperating agency in the preparation of this DEIS.

Background and General Project Description

Bangor Hydro-Electric Company (BHE) previously received approval from the DOE to construct a 345-kV electric transmission line that would extend eastward approximately 85 miles from BHE's existing Orrington, Maine substation to the United States-Canada border near Baileyville, Maine. At the border, the proposed transmission line was to connect to similar facilities to be built by New Brunswick Power, a Crown corporation of Canada's Province of New Brunswick. The project was never constructed.

Currently, BHE is seeking approval to build a modified version of the previously authorized transmission line route. The project, now known as the Northeast Reliability Interconnect (NRI), proposes to construct a 345-kV transmission line along the Modified Consolidated Corridors Route between the Orrington Substation and Baileyville, Maine. The purposes of the NRI are to: 1) improve the reliability and stability of the electric transmission systems of both the Maritimes area of Canada (New Brunswick, Nova Scotia, and Prince Edward Island) and New England; 2) increase the import-export transmission capacity between Maine and New Brunswick; and 3) reduce costly transmission line losses.

[This page intentionally blank.]

Comments on the DEIS

Summary, Pages S-5-6:

USFWS-1

The Service is correctly identified as a cooperating agency in the preparation of this DEIS. However, the DEIS incorrectly states that the Service has **no** decisions to make based on this document. Because there are species listed under the ESA that occur within the area of the proposed NRI project, the Service must decide if it concurs with the conclusions of the DOE regarding impacts to ESA-listed species.

Chapter 2, Proposed Action and Alternatives:

The Modified Consolidated Corridors (MCC) Route would be approximately 85 miles long, and would consist of 15 miles of new right-of-way (ROW), 58 miles adjacent to the Maritimes & Northeast Pipeline natural gas pipeline and/or the Stud Mill Road, and 12 miles adjacent to the Maine Electric Power Company existing 345-kV transmission line.

During 2004 and 2005, the Service participated in a stakeholder's group sponsored by BHE to explore alternative corridors for the NRI project. Based on the discussion of the multiple factors involved in choosing a route for the new transmission line as provided in the DEIS, the Service concurs with BHE and DOE's choice of the MCC Route as the preferred alternative.

USFWS-2

Section 2.4.1 (*Mitigation Practices to be Used for Pre-Construction Activities, pages 2-37 to 2-38*) lists the need to conduct an aerial survey in the spring of 2006 to identify any new or unknown bald eagle nests in the vicinity of the proposed ROW. Recent discussions have been held between the Service, the Maine Department of Inland Fisheries and Wildlife (MDIFW), and BHE and their environmental consultant (TRC Solutions) to clarify the details of the necessary pre-construction surveys for eagle nests. One survey in the spring of 2006 will not be adequate for determining the presence of new or unknown nests. For additional details on this issue, please see the comments later in this letter on **Appendix F: Biological Assessment for the Bangor Hydro-Electric Company Northeast Reliability Interconnect**.

USFWS-3

Section 2.4.2 lists mitigation measures that will be using during construction. It is not clear which streams fall into the proposed category for the Atlantic Salmon stream buffer, where only those trees capable of growing into the 15 foot clearance zone in the next three to four years would be topped or removed. We recommend that this buffer zone apply to all permanent streams within the Gulf of Maine Distinct Population Segment (DPS) watersheds, regardless of whether or not the stream itself provides habitat for salmon. Protecting these streams to the maximum extent possible (e.g., by minimizing the loss or riparian vegetation) will afford better overall ecological health of the DPS watersheds.

USFWS-4

Furthermore, it is very important that refueling or maintenance of equipment, including chain saws, does not occur with the buffer area of any streams in the DPS watersheds.

USFWS-5

Section 2.4.5 provides mitigation practices for use during ROW maintenance. BHE will maintain a "sensitive area" database to assist in future maintenance work. This database should note the location of all DPS stream crossings and highlight the appropriate stream buffers that need to be maintained.

Response to USFWS-1:

The last sentence of Section S.3.1 (pages S-5 and S-6), as well as the last sentence of Section 1.3.1 (page 1-6) of the Draft EIS, has been changed to acknowledge USFWS's concurrence responsibilities under DOE's responsibilities to consult with the USFWS under Section 7 of the ESA. DOE will complete the consultation process before issuing its ROD.

Response to USFWS-2:

The last bullet on page 2-37 (Section 2.4.1) of the Draft EIS has been modified to state that the applicant would conduct aerial surveys for bald eagle nests after leaf fall, but before ROW clearing, in 2005 and again in the spring of 2006 and 2007.

Response to USFWS-3:

As discussed in the response to EPA-6, BHE's first priority of ROW management is to protect the conductors to ensure the reliability of electric power transmission. Thus, BHE believes that it is necessary to remove or top all capable species of trees (i.e., only those trees capable of growing to a height within 15 ft [4.6 m] of a conductor within the next 3- to 4-year maintenance cycle) that are 8 to 10 ft (2.4 to 3.0 m) or taller for reliability requirements. The applicant would alter this maintenance procedure at streams and rivers known to contain or potentially contain Atlantic salmon habitat by siting support structure locations as close to the edge of the salmon stream buffers as possible to create a conductor height that would allow for higher vegetation requiring minimal trimming. The closer the support structure is to the stream, the higher the conductor would be over the streams and therefore the taller the vegetation could be. This would result in taller buffers that provide maximum shading (and cooling) of the salmon habitat streams. In one instance (a tributary to Fletcher Brook), it would not be possible to locate the support structure near the edge of the salmon stream buffer, so the applicant would use a taller structure.

As described in Section 3.5.4.1 (page 3-24) of the Draft EIS, only nine streams or rivers that would be crossed by the NRI have been identified by the USFWS and BHE as containing salmon habitat or potential salmon habitat: Narraguagus River, two tributaries to Fifth Machias Lake, a tributary to Fletcher Brook, Machias River, a tributary to Dead Stream, Lanpher Brook, Huntley Brook, and Joe Brook. As described in Section 2.4.2 (page 2-41) of the Draft EIS, only trees capable of growing within 15 ft (4.6 m) from the conductors within the next 3- to 4-year maintenance cycle would be topped or removed within these stream buffers.

In addition, BHE would apply similar vegetation maintenance restrictions described above at all perennial streams located in the Narraguagus, Machias, and East Machias River watersheds. Accordingly, within these waterbody buffers, only those trees capable of growing to a height within 15 ft (4.6 m) of the conductors within 3 to 4 years would be topped or removed (in addition to any dead or danger trees). The applicant believes that the potential for additional height along these streams should minimize potential warming that might otherwise result from

[This page intentionally blank.]

maintaining adjacent vegetation at 8 to 10 ft (2.4 to 3.0 m) tall. Atlantic salmon DPS streams located in the Penobscot River watershed (Cove Brook watershed) would receive the standard maintenance procedure (i.e., top all capable species of trees 8 to 10 ft [2.4 to 3.0 m] or taller) as the location of the NRI crossings of these streams are already "open" habitat (e.g., either fields or emergent or scrub-shrub wetlands).

Routine vegetation maintenance of the ROW for the NRI would require compliance with New England Power Pool Vegetation Maintenance Standards to maintain the integrity and functionality of the transmission line, to maintain access in case of emergency repairs, and to facilitate safety inspections. Thus, BHE would reserve the right to top or remove vegetation that could potentially affect the reliability of the transmission line between the 3- to 4-year maintenance cycle and, in some cases, may remove vegetation that may not have the potential to encroach within 15 ft (4.6 m) of the conductors before the next maintenance cycle.

The applicant believes that trying to maintain this taller vegetation height at all stream crossings would be unduly complicated and increase line reliability risks. Nevertheless, BHE would establish buffers at all stream crossings, although the vegetation would not be as tall as that at the nine salmon streams previously discussed. DOE believes that the ROW management approach developed by the applicant considers Atlantic salmon impacts to the extent practicable.

Response to USFWS-4:

No refueling or maintenance of equipment would be performed in any of the streams or stream buffers located in Atlantic salmon Gulf of Maine DPS watersheds. A text change has been made to the first complete mitigation measure on page 2-42 (Section 2.4.2) of the Draft EIS to stress this point.

Response to USFWS-5:

The applicant's vegetation management plan would include a listing of all sensitive areas, including those that are Atlantic salmon Gulf of Maine DPS stream crossings along the ROW. As discussed in the response to USFWS-3, appropriate stream buffers would be established at all stream crossings that would minimize potential impacts on Atlantic salmon to the extent practicable.

3

Chapter 3, Affected Environment:

USFWS-6

Page 3-21 states that Atlantic salmon currently do not spawn in the immediate vicinity of the project (or any of the alternatives), but that **potential** spawning habitat occurs in many of the streams crossed by the preferred and alternative routes. In fact, there is **known** (and mapped) Atlantic salmon spawning in some of the rivers crossed by the project, including the Machias and Narraguagus rivers. The Narraguagus River, for example, contains mapped spawning habitat starting about one mile below the proposed crossing near the Stud Mill Road and extending for several miles downstream. The Machias River has mapped spawning habitat both above Second Machias Lake and below First Machias River. The proposed crossing occurs on a stretch of the river between First Machias and Second Machias lakes. We recommend that DOE revise this section to more accurately reflect the presence of known, rather than just potential, salmon spawning habitat in the watersheds crossed by the project.

USFWS-7

The second sentence in section 3.5.4.1 should be modified to read "Watersheds that are used by this population segment include the Sheepscot, Ducktrap, Narraguagus, Pleasant, Machias, East Machias, and Dennys rivers and Cove Brook."

USFWS-8

We recommend that DOE re-examine both the preferred alternative and the other alternatives evaluated in the DEIS related to stream crossings in the lower Penobscot River watershed. As explained elsewhere in this letter, the Gulf of Maine Distinct Population Segment of Atlantic salmon includes the Penobscot River and its tributaries below the site of the Bangor Dam, including but not limited to Cove Brook. Based on recent discussions with BHE's environmental consultants, it appears that these waterbodies may not have been considered part of the DPS.

Appendix F: Biological Assessment for the Bangor Hydro-Electric Company Northeast Reliability Interconnect:

DOE has prepared a Biological Assessment (BA) to consider the impacts of the NRI project on two species listed under the ESA, the bald eagle and the Gulf of Maine DPS of the Atlantic salmon. Both of these species occur in the general project area and could be affected by the proposed transmission line.

Bald Eagle

USFWS-9

Based on the most current information available to the Service, there are no known bald eagle nests, either within the proposed ROW or within 1320 feet (1/4 mile or 402 meters) of the outside edges of the ROW. However, bald eagles do occur in the general project area, building large stick nests in tall trees and foraging for fish, waterfowl, and other prey primarily over large water bodies, such as the Narraguagus and St. Croix rivers and Pocomoonshine Lake. The proposed ROW and adjacent forest lands provide appropriate habitat that could support a new eagle nest location in the near future.

At a meeting with the Service, MDIFW, BHE, and TRC Solutions on January 20, 2005, we discussed the need to conduct thorough searches for new or unknown eagle nest locations along the ROW before construction begins. Based on those discussions, the Service assumed that if construction were to begin in 2005, including ROW clearing, a nest survey would be conducted during the spring of 2005 (as documented in meeting minutes provided by TRC Solutions on February 12, 2005). For reasons not clear to us, a survey was not conducted in spring 2005.

Response to USFWS-6:

The last paragraph of Section 3.5.2 (page 3-21) of the Draft EIS has been modified to incorporate the information provided by the USFWS in its comment.

Response to USFWS-7:

The second sentence of Section 3.5.4.1 (page 3-23) of the Draft EIS has been modified, as suggested.

Response to USFWS-8:

As stated in the response to USFWS-3, the Atlantic salmon DPS streams located in the Penobscot River watershed (Cove Brook watershed) would receive the standard maintenance procedure (i.e., top all capable species of trees 8 to 10 ft [2.4 to 3.0 m] or taller), since the locations of the NRI crossings of these streams are already "open" habitat (e.g., either fields or emergent or scrub-shrub wetlands). Also, the geographic range of the Atlantic salmon Gulf of Maine DPS, as described in the comment letter, has been added to Section 3.5.4.1 (page 3-23) of the Draft EIS.

Response to USFWS-9:

Section F.5.1 of the Draft EIS has been modified to include a discussion of the surveys that would be conducted for bald eagle nests after leaf fall, but before construction, in 2005, and again in the spring of 2006 and 2007. Information has also been added to Section F.5.1 of the Draft EIS to clarify that DOE would reinitiate consultation with the USFWS if any new nests are identified after any of the surveys. Similar discussion has been added to Sections 2.4.1 (page 2-37) and 4.5.2.1.8 (page 4-35) of the Draft EIS.

Although a fall survey will be conducted before ROW clearing begins in the late fall/early winter 2005 (see details below), such a survey is not as likely to identify a new nest location. The very visible presence of adult bald eagles (i.e., their white heads and tail feathers) during the nesting season, either on the nest or in the vicinity, is one of the best visual clues leading to the discovery of a new nest location.

Based on recent discussions among the Service, MDIFW, BHE, and TRC Solutions, the following protocols will be followed for fall 2005 and spring 2006/2007 bald eagle nest surveys:

1. Fall Survey:

a. The survey will be conducted using standard low altitude aerial surveillance techniques from an aircraft. The survey will be conducted using at least one observer experienced in low altitude location and identification of bald eagle nests in riparian and other terrestrial habitats in Maine.

b. The survey will be conducted **after** leaf-fall but **before** any ROW clearing commences.

c. The fall survey needs to encompass only the foot print of the ROW where clearing is proposed, since bald eagles are not actively engaged in nesting activities during this time of year. Ideally, the footprint of the entire length of the ROW should be surveyed. Alternatively, if the entire ROW cannot be surveyed in the fall of 2005, the extent of the fall survey can be limited by focusing on those portions of the ROW that cross or are near major water bodies such as rivers, streams, lakes, ponds, flowed wetlands or wetland complexes. To accomplish this more limited survey, the entire ROW footprint should be surveyed in those locations where either 1) the ROW crosses within ½ mile (2,640 feet or 805 meters) of a major waterbody; or 2) the ROW lies within 1.1 mile (5,808 feet or 1,770 meters) of a major waterbody.

USFWS-9 (cont.)

d. If a new eagle nest is located within the ROW, the DOE[1] will consult (i.e., reinitiate Section 7 consultation) with the Service **before** any clearing activities begin.

2. Spring Survey(s):

a. The survey(s) will be conducted in the spring of 2006 and the spring of 2007 if construction is not yet completed on the project.

b. The survey(s) will be conducted using standard low altitude aerial surveillance techniques from an aircraft. The survey will be conducted using at least one observer experienced in low altitude location and identification of bald eagle nests in riparian and other terrestrial habitats in Maine.

c. The survey(s) will be conducted during the annual spring nest survey period used by the Service and MDIFW (generally March through May), preferably during the last week in April. The most appropriate timing of the survey, however, can be variable depending on

[1] Please note that since the DOE is the federal action agency, it is DOE's responsibility to comply with Section 7 of the ESA, not BHE's. Page 2-37 of the DEIS notes that if any new bald eagle nests are identified, BHE will consult with the Service. While it is certainly appropriate for discussions to occur between BHE and the Service should new nests be found, the DOE maintains the ultimate responsibility for Section 7 consultation and needs to be involved with this dialogue.

[This page intentionally blank.]

weather conditions and the chronology of a given year's eagle nesting season. The specific timing of each year's spring survey should be coordinated with the Service and MDIFW beforehand.

USFWS-9 (cont.)

d. The spring survey should include the entire ROW (although a new nest would generally not be expected in those portions of the ROW already cleared) plus a ¼ mile (1320 foot or 402 meters) wide swath measured from both outside edges of the corridor.

e. If a new eagle nest is located within the survey area, the DOE will consult (i.e., reinitiate Section 7 consultation) with the Service **before** any further clearing or construction activities take place.

We concur with DOE that electrocution of bald eagles should not be a threat from this project because the distance between the conductors and between the conductors and the shield wires is greater than the wing span of an eagle. The proposed NRI project, however, may affect the bald eagle because of the threat posed by collisions with the transmission lines. Such collisions can result in either the death of or serious injury to an eagle.

USFWS-10

To minimize the threat posed to bald eagles from collisions with the transmission line, the DEIS states that BHE will install either colored spheres (i.e., aviation marker balls) or bird flappers/diverters to increase the visibility of the line to bald eagles. Since the DEIS was published, BHE has provided additional information related to flappers, indicating that these markers are not appropriate for the NRI transmission lines due to concerns about icing, wire abrasion, and the need to periodically replace moving parts on the flapper. Therefore, the most current proposal is to use only aviation marker balls to mark lines in those areas that pose a risk to bald eagles. Marker balls will be installed during construction of the transmission lines at the following locations: 1) the St. Croix River; 2) Great Works Stream; 3) Narraguagus River; and 4) Machias River. The Service agrees with this approach for marking the transmission lines, as long as DOE and BHE continue to coordinate with the Service as the specific details for the size, color, and spacing of the marker balls are developed.

USFWS-11

DOE's BA concludes that the proposed project may affect, but is not likely to adversely affect, the threatened bald eagle. As currently written in the BA, the Service cannot concur with this determination. In particular, the proper ROW surveys to look for new or unknown bald eagle nests must be included in the BA.

Atlantic Salmon

USFWS-12

As mentioned in our December 1, 2004 scoping comment letter, the proposed 345-kV transmission line would cross through the range of the endangered Gulf of Maine Distinct Population Segment of the Atlantic salmon. The draft recovery plan for the Atlantic salmon is expected to be finalized in the near future, so we recommend that DOE check on the status of the plan before finalizing the EIS (i.e., it may be possible to report the publishing of a final recovery plan).

USFWS-13

On page F-15, Cove Brook, a tributary of the Penobscot River, should be added to the list of watersheds currently known to support a remnant, wild population of endangered Atlantic salmon. Furthermore, we recommend that the last sentence in the first paragraph of this section, which contains some inaccuracies, be replaced with an accurate physical description of the geographic range of the Gulf of Maine DPS as follows: "The Gulf of Maine DPS encompasses

Response to USFWS-10:

Section F.5.1 of the Draft EIS has been modified to indicate that only marker balls rather than marker balls and/or flappers would be used at select areas to minimize the potential for bald eagles to collide with the transmission line. Similar changes have been made to Sections S.5.5 (page S-35), 2.4.4 (page 2-43), 2.5.5 (page 2-50), 4.5.2.1.4 (page 4-22), and 5.5 (page 5-2) of the Draft EIS.

Response to USFWS-11:

See the response to USFWS-9.

Response to USFWS-12:

The draft recovery plan for the Atlantic salmon has not been finalized as of this writing.

Response to USFWS-13:

Section F.5.2 of the Draft EIS has been modified to incorporate the information provided in the comment. A similar modification has been made to Section 3.5.4.1 (page 3-23) of the Draft EIS.

USFWS-13 (cont.)

all naturally reproducing remnant populations of Atlantic salmon from the Kennebec River downstream of the former Edwards Dam site, northward to the mouth of the St. Croix River. The Penobscot River and its tributaries are only included downstream from the site of the Bangor Dam." These same comments also apply to page 3-23 in the DEIS, where the Gulf of Maine DPS is not accurately described.

USFWS-14

Page F-15 states that the NRI would not cross any Atlantic salmon spawning and rearing areas (Table 3.5-8 in the DEIS). DOE should clarify how it reached this conclusion. While the Maine Atlantic Salmon Habitat Atlas was probably used, at least in part, DOE should be aware that these maps do **not** include all segments of available Atlantic salmon habitat, particularly habitat for juvenile salmon in smaller streams. For example, both Joe Brook and Huntely Brook, in the upper reach of East Machias River watershed north of Crawford Lake, have been identified in the field by the Service and the MEASC as providing suitable habitat for juvenile Atlantic salmon, particularly as cold water refugia during the summer months. However, neither one of these brooks is currently included in salmon habitat atlas. As currently proposed, it appears that the NRI would cross both of those streams in areas that could be used by juvenile Atlantic salmon, particularly during the summer months when fish are seeking cold water. This could be the case for other streams within the DPS, as well. So, while it appears that the NRI does not cross any salmon spawning habitat, there are certainly crossings over streams that provide juvenile habitat.

USFWS-15

Page F-16 lists several factors contributing to the endangered stauts of the DPS, including "its small spawning range in the rivers". This factor has not been identified as contributing to the listing of the Atlantic salmon as endangered, so we recommend deleting this phrase. Page F-16 gives the estimated adult returns to the entire DPS for the year 2002 as less than 50 adults (the actual number is 37 estimated adult returns). The final EIS should include the most recent data from 2003 (76 estimated adult returns) and 2004 (82 estimated adult returns). The return estimates for 2005 are not likely to be available before a final EIS is published by DOE.

USFWS-16

The DEIS and BA identify 117 streams and rivers that would be crossed by the NRI project, including both intermittent and permanent streams. Table G-3 lists all of these stream crossings, while Table 3.5-8 states that 31 Gulf of Maine DPS waterbodies and 67 Essential Fish Habitat waterbodies would be crossed by the project. However, we cannot find a list of the 31 streams within the DPS that are crossed by the project. Because there can be confusion over the definition of the Gulf of Maine DPS, we recommend that DOE provide a list of the 31 streams to the Service for confirmation. For example, Felts Brook, a tributary of the Penobscot River, is within the geographic range of the DPS and contains mapped salmon spawning and rearing habitat in the lower reach of the river. Felts Brook, however, does not currently contain a known remnant population of naturally reproducing salmon.

USFWS-17

The BA discusses mitigation measures that would be used during construction and maintenance of the project to minimize potential impacts on Atlantic salmon. The BA, however, does not thoroughly discuss how the project would affect Atlantic salmon and their habitat. In order for the Service to determine whether or not the proposed mitigation measures are sufficient to protect Atlantic salmon and, ultimately, for the Service to concur with DOE's conclusion that the project is not likely to adversely affect Atlantic salmon, the BA needs to clearly discuss how the project would impact salmon and how the proposed mitigation measures address those impacts. Some of this discussion could be taken from the Essential Fish Habitat (EFH) Assessment in Appendix G of the DEIS, which discusses project effects on Atlantic salmon EFH, as well as from Chapter 4, Environmental Consequences.

Response to USFWS-14:

Section F.5.2 of the Draft EIS has been modified to incorporate the information provided in the comment.

Response to USFWS-15:

Section F.5.2 of the Draft EIS has been modified to incorporate the information provided in the comment. A similar modification has been made to Section 3.5.4.1 (page 3-24) of the Draft EIS.

Response to USFWS-16:

A table that includes the list of the 37 crossings of Atlantic salmon Gulf of Maine DPS streams has been added to Section F.5.2 of the Draft EIS.

Response to USFWS-17:

A discussion of how the proposed project would affect the Atlantic salmon has been added to Section F.5.2 of the Draft EIS. This discussion was taken from the Essential Fish Habitat Assessment (Appendix G) of the Draft EIS, as suggested in the comment.

7

USFWS-18 Page F-17 lists one of the mitigation measures as placing support structures as close to the stream buffer as possible at salmon stream crossings to maximize the conductor height and, therefore, minimize the required clearing of vegetation. This mitigation measure, however, would not apply at the Narraguagus and Machias river crossings. We assume that the reason for these exceptions is because the stream channels are quite wide at the Narraguagus and Machias crossing locations, and the existing vegetative buffer does not completely shade the stream channel anyway. This was discussed at a January 19, 2005 meeting between BHE, the Service, and the MEASC. The BA should explain why the Narraguagus and Machias river crossings are excluded from the standard for placement of support structures near salmon streams.

USFWS-19 Another mitigation measure to minimize impacts to Atlantic salmon is to conduct construction activities, including clearing, during winter when the ground is frozen, as feasible. We strongly recommend that BHE carefully schedule and prioritize their clearing and construction activities, so that all work within DPS watersheds can occur during frozen ground conditions to minimize the impacts of erosion and sedimentation on streams. Careful attention to sediment and erosion control practices is particularly crucial near all stream crossings within the Gulf of Maine DPS.

USFWS-20 Based on recent experience with the Maritimes & Northeast natural gas pipeline in eastern Maine, all-terrain vehicles (ATV) in and near streams along a maintained ROW can cause serious sedimentation problems, damage riparian vegetation, and destroy instream habitat (e.g., cause the stream channel to become wider and shallower than it is naturally). While we don't necessarily expect ATV use to be a problem at all stream crossings along the proposed project, we recommend that DOE assess the potential of such impacts within the DPS and propose possible mitigation techniques for excluding or controlling ATV use.

DOE's BA concludes that the proposed project may affect, but is not likely to adversely affect, the endangered Atlantic salmon. As currently written in the BA, the Service cannot concur with this determination. When the above comments have been addressed, the Service will reconsider DOE's conclusion regarding Atlantic salmon and advise the DOE whether or not further Section 7 consultation is necessary.

Conclusion

USFWS-21 As discussed above, the Service cannot concur at this time that the proposed project is not likely to adversely affect the threatened bald eagle and the endangered Atlantic salmon. When the BA is appropriately revised to incorporate our comments, the Service will reconsider DOE's conclusion related to listed species. Of particular note, if a new or unknown bald eagle nest is discovered during the required bald eagle nest surveys, DOE must re-initiate Section 7 consultation with the Service. This contingency should be clearly spelled out in the revised BA.

General questions and those specific to the endangered Atlantic salmon should be directed to Wende Mahaney in the Service's Maine Field Office at 207-827-5938, extension 20. Questions specific to the threatened bald eagle should be directed to Mark McCollough in the Maine Field Office at 207-827-5938, extension 12.

Response to USFWS-18:

A footnote has been added to Section F.5.2 of the Draft EIS to explain that the support structures at the Narraguagus and Machias Rivers would be located farther away from the rivers in order to minimize visual impacts at these Outstanding River Segments. The footnote goes on to state that as the existing vegetation does not completely shade the rivers, no thermal warming of the rivers would be expected due to having the support structures located farther away from these rivers.

Response to USFWS-19:

To the extent practicable, BHE would conduct clearing and construction activities at the DPS watershed crossings during winter. It is important to stress that no instream disturbances would be associated with NRI clearing and construction and that buffers would be maintained at all stream crossings. Therefore, when combined with the applicant's sedimentation and erosion control practices (as summarized in Section 2.4 of the Draft EIS), no adverse impacts on Atlantic salmon or their habitat would be expected.

Response to USFWS-20:

Essentially no damage has occurred from all-terrain vehicle (ATV) use in eastern Maine associated with the M&N gas pipeline (McLachlan 2005). The applicant does not currently have any specific mitigation measures in place to control ATV use. Maintaining woody species, to the extent and height practicable, at NRI stream crossings would minimize the tendency for ATVs to cross streams and rivers at the NRI ROW, particularly where co-located with the M&N gas pipeline and/or Stud Mill Road.

Response to USFWS-21:

See the response to USFWS-9.

8

Thank you for the opportunity to review and comment on this DEIS. Please feel free to contact me at (617) 223-8665 if I can be of further assistance.

Sincerely,

Andrew L. Raddant /s/
Regional Environmental Officer

3 CHANGES TO THE DRAFT EIS FOR THE BANGOR HYDRO-ELECTRIC COMPANY NORTHEAST RELIABILITY INTERCONNECT

This chapter provides corrections to the text, tables, and figures of the *Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect* (DOE/EIS-0372). It also provides clarifying information for the Draft EIS. The corrections and clarifying information have been provided to respond to comments received on the Draft EIS; to reflect changes in, or provide clarification of, interconnect design features (e.g., the decision to use just ball markers rather than ball markers and/or flappers) or procedures (e.g., preconstruction surveys, mitigation measures) that the applicant has further defined since the publication of the Draft EIS (Paquette 2005e,g; Faloon Saucier 2005); or to correct errors in the Draft EIS.

Some of the changes made to the Draft EIS are due to recent agreements made between the applicant and the USFWS and the MDIFW regarding bald eagle surveys. Additional changes relate to the applicant's decision to only use ball markers rather than ball markers and/or flappers to minimize the potential for bald eagles and other birds to collide with the NRI conductors or shield wires. This change was based on engineering considerations (e.g., flappers can cause abrasion, which can damage the shield wire and can create additional ice loading problems that could cause outages). The use of just ball markers has been proven to be reliable as a bird deterrent, and they are considered mechanically reliable and stable (Paquette 2005g). The remaining changes, made in response to comments received on the Draft EIS, include more detailed information on vernal pools and updated information on the Atlantic Salmon.

Page S-5/S-6 (Section S.3.1):

The last sentence of Section S.3.1 should be modified to read:

"The U.S. Department of the Interior's U.S. Fish and Wildlife Service (USFWS) and the U.S. Department of Commerce's National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) are cooperating agencies in DOE's EIS preparation. The USFWS must decide whether it concurs with DOE's conclusions regarding impacts on Federally listed threatened or endangered species as part of the Section 7 consultation process under the Endangered Species Act; this decision must be made before DOE issues a ROD."

Page S-29 (Section S.4.3.5):

The last sentence of the second paragraph on page S-29 should be changed to read: "It is expected that AC mitigation would be installed by M&N prior to the NRI being energized."

Page S-35 (Section S.5.5):

The following paragraph should be added before the first full paragraph on page S-35:

"Installation of AC mitigation for the M&N pipeline would require the disturbance of some wetland areas. On the basis of the mean percentage of the alternative routes that makes up wetlands (8.7%) and the area of AC mitigation required, approximately 7 acres (2 ha) would be disturbed for the Modified Consolidated Corridors, Consolidated Corridors, and the Previously Permitted Routes. Wetland disturbance for installation of AC mitigation for the MEPCO South Route would be about 5 acres (2 ha). AC mitigation installation would require excavation of soils immediately above the pipeline. These areas were previously disturbed during initial pipeline installation in 1999. They now support wetland emergent habitat that has developed since that time. Wetlands disturbed during trenching would be restored with the original topsoil to the original grade and seeded with annual grass. It is expected that these wetlands would recover within one or two growing seasons following installation of AC mitigation."

Page S-35 (Section S.5.5)

The following text should be deleted from the first full paragraph, fourth sentence on page S-35: "and/or flappers."

Page S-35 (Section S.5.6):

The start of the first sentence of Section S.5.6 should be changed to read: "Based on coordination and consultations that the BHE had with the Maine Historic Preservation Commission and Native American Tribes, no impacts …"

Page S-44 (Section S.5):

In Table S-4, the number of Atlantic salmon DPS waterbodies should be changed from 31, 32, 27, and 0 to 37, 38, 33, and 6, respectively.

Page 1-6 (Section 1.3.1):

The last sentence of Section 1.3.1 should be modified to read:

"The U.S. Department of the Interior's U.S. Fish and Wildlife Service (USFWS) and the U.S. Department of Commerce's National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) are cooperating agencies in DOE's EIS preparation. The USFWS, in particular, must decide on whether it concurs with DOE's conclusions regarding impacts on Federally listed threatened or endangered species."

Page 2-2 (Section 2.1.1):

The following paragraphs should be added to the end of Section 2.1.1 of the Draft EIS:

"In a Presidential permit proceeding, the applicant, rather than DOE, proposes the project and the EIS becomes an applicant-driven EIS. While DOE does have an action to take (i.e., grant or deny the requested permit amendment), the proposed action and the range of reasonable alternatives in the EIS should be consistent with the applicant's purpose and need and be practicable and able to be implemented by the applicant based on technical, economic, and practical considerations.

On the basis of the above, DOE has selected the Modified Consolidated Corridors Route as its preferred alternative because it is the applicant's preferred alternative and because the State of Maine has expressed its preference for that route by granting a permit for development of the NRI along that route."

Page 2-34 (Section 2.3.5):

The last sentence of page 2-34 should be changed to read: "It is expected that AC mitigation would be installed by M&N prior to the NRI being energized (Paquette 2005ee)."

Page 2-37 (Section 2.4.1):

The following bullet should be added after the first bullet in Section 2.4.1:

"• A cultural resource survey for archaeological sites and historic structures and features would be conducted for areas not previously surveyed. The results of the surveys would have to be approved by the State Historic Preservation Officer (SHPO) and, as appropriate, in consultation with Native American Tribes before the project would be constructed."

Page 2-37 (Section 2.4.1):

Section 2.4.1, fourth bullet, the first two sentences should read: "The applicant would perform aerial surveys after leaf fall, but before ROW clearing, in 2005, and again in the spring of 2006 and 2007 to identify any new bald eagle nests that might have become established within 0.25 mi (0.4 km) of the ROW (Paquette 2005pp). If new nests are identified, DOE would reinitiate consultation with the USFWS, and then BHE would consult with the Maine Department of Inland Fisheries and Wildlife (MDIFW) and the USFWS to determine appropriate mitigation for potential impacts."

Page 2-41 (Section 2.4.2):

The start of the next to last bullet on page 2-41 should be changed from: "Salmon stream buffers …" to "Buffers for the nine streams or rivers that contain salmon habitat or potential salmon habitat (see Section 3.5.4.1) …"

Page 2-42 (Section 2.4.2):

The first complete bullet on page 2-42 should be modified to read:

"No refueling or maintenance of equipment, including chain saws, would occur within any buffer areas, including those associated with streams in the Atlantic salmon Gulf of Maine distinct population segment (DPS) waterbodies."

Page 2-42 (Section 2.4.2):

The following bullet should be added at the end of Section 2.4.2:

"• If cultural resources are unexpectedly encountered, the applicant would need to have an on-site inspection by the SHPO to determine if avoidance or other mitigation of the resource would be required."

Page 2-43 (Section 2.4.4):

The following text should be deleted from Section 2.4.4, second bullet: "and/or flappers."

Page 2-43 (Section 2.4.4):

The following text should be changed in Section 2.4.4, third bullet: "Flappers would also be used …" to "Colored marker balls would also be used …"

Page 2-50 (Section 2.5.5):

The following text should be deleted from the first paragraph, fourth sentence of page 2-50: "and/or flappers."

Page 2-58 (Table 2.5-1, Section 2.5):

In Table 2.5-1, the number of Atlantic salmon DPS waterbodies should be changed from 31, 32, 27, and 0 to 37, 38, 33, and 6, respectively.

Page 2-62 (Section 2.5)

"Faloon Saucier (2005)" should be added to the sources for Table 2.5-1.

Page 3-21 (Section 3.5.2):

The following sentences should be added before the last sentence of Section 3.5.2:

"In addition, known Atlantic salmon spawning occurs in some of the rivers that would be crossed by the Modified Consolidated Corridors, Consolidated Corridors, or Previously Permitted Routes, including the Machias and Narraguagus Rivers. In the Narraguagus River,

mapped spawning habitat occurs from about 1.0 mi (1.6 km) south of Stud Mill Road and extends for several miles downstream. In the Machias River, mapped spawning habitat occurs both above the Second Machias Lake and below First Machias Lake. The proposed NRI would cross the Machias River between these lakes (Raddant 2005)."

Page 3-21 (Section 3.5.3):

The following paragraphs should be added following the first paragraph of Section 3.5.3:

"Vernal pools are seasonal wetland habitats that may serve as reproductive and nursery sites for a variety of amphibian species. They are also important for reptile and invertebrate species. These pools are formed by the accumulation of precipitation and storm water runoff in topographical depressions in the spring and/or fall, but are often dry in summer. As a result of their seasonal occurrence, these pools are fish-free habitats. Therefore, vernal pools provide a relatively predator-free habitat for amphibians to deposit eggs and for larvae to mature to adulthood. Adult amphibians may come from 1,000 ft (305 m) or more away to breed in these pools.

In Maine, some vernal pools are considered significant wildlife habitat (along with deer yards, waterfowl and wading bird habitats, and other habitats) (Calhoun et al. 2003). For a vernal pool to be considered a significant wildlife habitat it would have to be (1) used by a State-listed threatened or endangered species that commonly requires the use of a vernal pool for a critical portion of its life history, and/or (2) have documented breeding by one or more vernal pool indicator species. The vernal pool indicator species include the wood frog (*Rana sylvatica*), spotted salamander (*Ambystoma maculatum*), blue-spotted salamander (*A. laterale*), four-toed salamander (*Hemidactylium scutatum*), and fairy shrimp (Calhoun et al. 2003). Vernal pools were not identified during the macrolevel analysis of the alternative routes. However, 20 candidate vernal pools were identified along the Modified Consolidated Corridors Route during the wetland survey of that route conducted for the State permit application (Paquette 2005oo). Because vernal pools may form in any topographical depression, it could be assumed that vernal pools would also occur within the other alternative routes."

Page 3-22 (Section 3.5.4):

The following sentences should be added after the second sentence of the first paragraph of Section 3.5.4:

"Species of special concern are species that are rare in Maine, but not so rare as to be considered threatened or endangered. These species do not receive legal protection."

Page 3-23 (Section 3.5.4.1):

The second and third sentences of the first paragraph of Section 3.5.4.1 should be replaced with the following sentences:

"It encompasses all naturally reproducing remnant populations of Atlantic salmon from the Kennebec River downstream of the former Edwards Dam site, northward to the mouth of the St. Croix River. The Penobscot River and its tributaries are only included downstream from the site of the Bangor Dam. Watersheds that could be used by the Gulf of Maine DPS include the Sheepscot, Ducktrap, Narraguagus, Pleasant, Machias, East Machias, and Dennys Rivers and Cove Brook (Raddant 2005)."

Page 3-24 (Section 3.5.4.1):

In the second sentence of the first full paragraph on page 3-24, delete "its small spawning range in the rivers," and change the last sentence to read "The estimated total returns (i.e., adults returning from the sea for spawning) were 37 in 2002, 76 in 2003, and 82 in 2004 (Raddant 2005)."

Page 3-24 (Section 3.5.4.1):

In Table 3.5-8, the number of DPS waterbodies should be changed from 31, 32, 27, and 0 to 37, 38, 33, and 6, respectively. Also, "Faloon Saucier (2005)" should be added to the sources.

Page 4-22 (Section 4.5.2.1.4):

The following text should be deleted from the second paragraph, fourth sentence of page 4-22: "and/or flappers."

Page 4-25 (Section 4.5.2.1.7)

The following paragraph should be added after the second paragraph of Section 4.5.2.1.7:

"As discussed in Section 3.5.3, vernal pools are considered significant wildlife habitat. In small vernal pools located within forested areas that would be cleared for the ROW, predation upon amphibians and other vernal pool inhabitants may initially increase. However, once scrub-shrub habitat is established, the pool inhabitants would likely be more protected than in a vernal pool within a forested habitat with minimal ground cover. Also, the vernal pools within the ROW would not be impacted by subsequent developments, and amphibian species may experience less impact than occurs in vernal pools contained within areas subject to commercial timber harvesting."

Page 4-25 (Section 4.5.2.1.7):

The following paragraph should be added after the third paragraph of Section 4.5.2.1.7:

"Installation of AC mitigation for the M&N pipeline would require the disturbance of some wetland areas. On the basis of the mean percentage of the alternative routes that makes up wetlands (8.7%) and the area of AC mitigation required, approximately 7 acres (2 ha) would be disturbed for the Modified Consolidated Corridors, Consolidated Corridors, and the Previously Permitted Routes. Wetland disturbance for installation of AC mitigation for the MEPCO South

Route would be about 5 acres (2 ha). AC mitigation installation would require excavation of soils immediately above the pipeline. These areas were previously disturbed during initial pipeline installation in 1999. They now support wetland emergent habitat that has developed since that time. Wetlands disturbed during trenching would be restored with the original topsoil to the original grade and seeded with annual grass. It is expected that these wetlands would recover within one or two growing seasons following installation of AC mitigation."

Page 4-25 (Section 4.5.2.1.7):

The next-to-last sentence in the next-to-last paragraph of page 4-25 should be changed to read: "A number of wetlands of special significance, including vernal pools, would be located within the ROWs of the alternative routes (Section 3.5.3)."

Page 4-25 (Section 4.5.2.1.7):

The following sentences should be added to the end of the next-to-last paragraph of page 4-25: "While candidate vernal pools were identified within the Modified Consolidated Corridors Routes, support structures would not be located within them (Paquette 2005oo). In a similar manner, adjustments would be made in the placement of poles for the other alternative routes to avoid their placement in vernal pools."

Page 4-35 (Section 4.5.2.1.8):

The following text should be added to the first full paragraph of page 4-35 after the third sentence: "In addition, the applicant would perform aerial surveys after leaf fall, but before ROW clearing, in 2005, and again in the spring of 2006 and 2007 to identify any new bald eagle nests that might have become established within 0.25 mi (0.4 km) of the ROW (Paquette 2005pp). If any new nests are identified, DOE would reinitiate consultation with the USFWS, and then BHE would consult with the MDIFW and USFWS to determine appropriate mitigation for potential impacts."

Page 4-37 (Section 4.6.2.1.1):

In the first three paragraphs on page 4-37, the phase "a cultural resource survey would need to be conducted" should be changed to: "a cultural resource survey for both archaeological sites and historic structures and features would need to be conducted."

Page 4-37 (Section 4.6.2.1.2):

The start of the fourth sentence of Section 4.6.2.1.2 should be changed to: "These areas would likely require cultural resource surveys for both archaeological sites and historic structures and features before the new …"

Page 4-38 (Section 4.6.2.1.3):

In the last sentence of Section 4.6.2.1.3, "… a cultural survey may be necessary …" should be changed to "… a cultural resource survey for both archaeological sites and historic structures and features may be necessary …"

Page 4-38 (Section 4.6.2.1.4):

In the last sentence of Section 4.6.2.1.4, "… survey for cultural resources unless …" should be changed to "… survey for cultural resources, including both archaeological resources and historic structures and features unless …"

Page 5-2 (Section 5.5):

The following text should be deleted from the last sentence of Section 5.5: "and/or flappers."

Page 9-2 (Table 9-1):

Footnote b should be modified to read: "The applicant's original permit (#199010732) was issued on January 10, 1995, and expired on December 31, 2002. The applicant submitted its application for a new permit in May 2005 (BHE 2005)."

Page 11-3:

The following reference citation should be added: "Calhoun, A.J.K., et al., 2003, 'Evaluating Vernal Pools as a Basis for Conservation Strategies: A Maine Case Study,' *Wetlands* 23(1):70–81."

Page 11-5:

The following reference citation should be added:

"Faloon Saucier, D., 2005, 'Distinct Segment Population Waterbodies,' personal communication from Faloon Saucier (Devine Tarbell & Associates, Inc., Winterport, Maine) to W. Vinikour (Argonne National Laboratory, Argonne, Ill.), Oct. 29."

Page 11-13:

The following reference citations should be added:

"Paquette, G., 2005oo, 'Vernal Pools,' personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to W. Vinikour et al. (Argonne National Laboratory, Argonne, Ill.), Oct. 14."

"Paquette, G., 2005pp, 'Bald Eagle Surveys,' personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to J. Pell et al. (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 17."

"Raddant, A.L., 2005, 'Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect,' personal communication from Raddant (Regional Environmental Officer, U.S. Department of the Interior, Office of Environmental Policy and Compliance, Boston, Mass.) to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 31."

Page D-28 (Table D-3, Appendix D):

The genus name for the wood turtle should be changed from "*Clemmys*" to "*Glyptemys*."

Page D-39 (Table D-4, Appendix D):

On page D-39, the distribution of the Sedge Wren within Maine should read: "Southern two-thirds of the State," and its distribution within the project area should read: "Documented in 2003 in Great Works Stream and in 2005 at Sunkhaze Meadows National Wildlife Refuge about 1.5 mi (2.4 km) and 2.8 mi (4.5 km) from the Modified Consolidated Corridors Route, respectively." The reason for the rarity of the Sedge Wren should be modified to read: "Low population size, declining population trend, and a population distributed at few discreet sites."

Page D-41 (Table D-4, Appendix D):

On page D-41, add "Bard (2005)" to the Sources.

Page D-42 (Section D.2, Appendix D):

The following reference should be added to Section D.2 (Appendix D):

"Bard, R., 2005, "Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect," personal communication from Bard (Assistant Regional Wildlife Biologist, Maine Department of Inland Fisheries and Wildlife, Jonesboro, Maine) to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 11.

Page F-13 (Section F.5.1, Appendix F):

The first full paragraph on page F-13 of Section F.5.1 should be replaced with the following paragraphs:

"The habitat requirements of bald eagles are met in many places along the proposed route in addition to the specific nest sites described above. Therefore, the applicant would perform aerial surveys after leaf fall, but before ROW clearing, in 2005, and again in the spring of 2006 and 2007 to identify any new bald eagle nests that might have become established within 0.25 mi

(0.4 km) of the ROW (Paquette 2005c). The surveys would include a low-altitude flight with at least one observer experienced in the identification of bald eagle nests. The 2005 survey would cover the proposed ROW width (Paquette 2005c). The 2006 and 2007 surveys, which would occur around the last week of April, would primarily cover the ROW plus an additional 0.25 mi (0.4 km) swath on each side of the NRI measured from the outside edges of the ROW (Raddant 2005).

The spring surveys would occur during the mud season when construction work does not take place (Paquette 2005c). The applicant would only conduct clearing operations following the 2005 survey if no eagle nests are found. If any new nests are identified, BHE would consult with the MDIFW and USFWS to determine appropriate mitigation for potential impacts, while DOE would reinitiate consultation with the USFWS. Other construction activities would not occur until after the spring surveys and not before BHE has consulted with the MDIFW and USFWS regarding the survey results (Paquette 2005c). If any new nests are identified following the spring surveys, BHE would consult with the MDIFW and USFWS to determine appropriate mitigation for potential impacts."

Page F-14 (Section F.5.1, Appendix F):

The third sentence of the third full paragraph of page F-14 of Section F.5.1 should read as follows: "Few mitigation measures directly related to the bald eagle (other than the aerial surveys previously mentioned to detect potential new nests) would be necessary because construction, connection, operation, and maintenance of the NRI would not occur close to State of Maine classified Essential Habitat for the bald eagle."

Page F-15 (Section F.5.1, Appendix F):

The following text should be deleted from the first full paragraph, first sentence of page F-15 of Section F.5.1: "and/or flappers."

Page F-15 (Section F.5.2, Appendix F):

The section number on page F-15 should be changed from "F.5-2" to "F.5.2."

Page F-15 (Section F.5.2, Appendix F):

The first, second, and fourth paragraphs of Section F.5.2 have been modified to incorporate the information provided in comments USFWS-13, USFWS-14, and USFWS-15. Please see the BA for these changes.

Page F-15 (Section F.5.2, Appendix F):

The start of the third sentence of the second paragraph of Section F.5.2 should be revised to read: "The NRI would have 37 crossings of waterbodies …" A table of Atlantic salmon Gulf of Maine DPS streams and rivers that would be crossed by the NRI has also been added to Section F.5.2. Please see the BA for this table.

Page F-16 (Section F.5.2, Appendix F):

Text discussing how the proposed project would affect the Atlantic salmon has been added to Section F.5.2. Please see the BA for this discussion.

Page F-17 (Section F.5.2, Appendix F):

A footnote has been added to the 6th bullet of the mitigation measures in Section F.5.2 explaining why the support structures would be located farther away from the Narraguagus and Machias Rivers. Please see the BA for this addition.

Page F-20 (Section F.7, Appendix F):

The following reference citations should be added:

"Paquette, G., 2005c, 'Bald Eagle Surveys,' personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to J. Pell et al. (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 17."

"Paquette, G., 2005d, "Distinct Population Segment Waterbody Crossings," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to I. Hlohowskyj and K. Picel (Argonne National Laboratory, Argonne, Ill.), Oct. 30.

"Raddant, A.L., 2005, 'Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect,' personal communication from Raddant (Regional Environmental Officer, U.S. Department of the Interior, Office of Environmental Policy and Compliance, Boston, Mass.) to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 31."

Page H-4 (Appendix H):

The photograph shown in Figure H-1 should be replaced with that shown in Figure 3-1, and the photosimulation shown in Figure H-2 should be replaced with that shown in Figure 3-2.

FIGURE 3-1 Existing MEPCO 345-kV Transmission Line at the Route 1A Crossing near Brewer

FIGURE 3-2 Photosimulation of the NRI at the Route 1A Crossing near Brewer

Page 4-27 (Section 4.5.2.1.8):

The following species information should be added to Table 4.5-4:

TABLE 4.5-4 Potential Impacts on Special Status Species from ROW Establishment

Species	Alternative Route			
	Modified Consolidated Corridors	Consolidated Corridors	Previously Permitted (No Action)	MEPCO South
Invertebrates				
Brook floater *Alasmidonta varicosa*	No impact expected; preferred habitat (creeks and small rivers) would not be impacted.	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Ebony boghaunter *Williamsonia fletcheri*	ROW construction could potentially reduce bog habitat quality or quantity.	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Amphibians				
Four-toed salamander *Hemidactylium scutatum*	ROW construction could potentially alter or eliminate habitat (e.g., wet woodlands).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Northern leopard frog *Rana pipiens*	ROW may both provide favorable habitat (wet open fields and meadows) and alter or eliminate habitat (e.g., wet woods).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors

TABLE 4.5-4 (Cont.)

Species	Alternative Route: Modified Consolidated Corridors	Alternative Route: Consolidated Corridors	Alternative Route: Previously Permitted (No Action)	Alternative Route: MEPCO South
Reptiles				
Wood turtle *Glyptemys insculpta*	No impact expected; no net loss of preferred habitat (streams, fields, woods).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Birds				
Cooper's hawk *Accipiter cooperii*	ROW may provide suitable habitat (open fields near woods).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Northern goshawk *Accipiter gentilis*	ROW may decrease preferred habitat in areas not close to existing corridors (interiors of heavily wooded forests).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Short-eared owl *Asio flammeus*	ROW may provide suitable habitat (e.g., open grasslands).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Olive-sided flycatcher *Contopus cooperi*	ROW may provide suitable habitat (e.g., coniferous forests near edges and clearing).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Rusty blackbird *Euphagus carolinus*	ROW may provide localized suitable habitat (e.g., alder and willow thickets near streams).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors

TABLE 4.5-4 (Cont.)

Species	Alternative Route: Modified Consolidated Corridors	Alternative Route: Consolidated Corridors	Alternative Route: Previously Permitted (No Action)	Alternative Route: MEPCO South
Birds (Cont.)				
Least bittern *Ixobrychus exilis*	ROW may provide suitable habitat (e.g., marshes with dense vegetation).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Black-crowned night-heron *Nycticorax nycticorax*	No impact expected; no net loss of preferred habitat (varied aquatic and wetland habitats).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Eastern screech owl *Otus asio*	ROW construction may decrease breeding habitat (e.g., trees), while the ROW may provide suitable foraging habitat (e.g., open woodlands).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Vesper sparrow *Pooecetes gramineus*	ROW may provide suitable habitat (e.g., meadows, open uplands, cutover areas in forests).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Eastern meadowlark *Sturnella magna*	ROW may provide suitable habitat (e.g., grassy meadows and areas with widely scattered shrubs).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors

TABLE 4.5-4 (Cont.)

Species	Alternative Route: Modified Consolidated Corridors	Alternative Route: Consolidated Corridors	Alternative Route: Previously Permitted (No Action)	Alternative Route: MEPCO South
Mammals				
Big brown bat *Eptesicus fuscus*	ROW construction could potentially eliminate habitat (e.g., hollow trees in wooded areas).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Hoary bat *Lasiurus cinereus*	ROW construction could potentially eliminate roosting habitat (e.g., trees).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Silver-haired bat *Lasionycteris noctivagans*	ROW construction could potentially alter or eliminate habitat (e.g., forested areas near streams).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Red bat *Lasiurus borealis*	ROW construction may eliminate roosting habitat (trees), while the ROW may increase foraging habitat (e.g., forest edges).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Little brown bat *Myotis lucifugus*	ROW construction may eliminate roosting habitat (trees).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors
Long-tailed shrew *Sorex dispar*	ROW construction may alter or eliminate preferred habitat (e.g., forests).	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors	Same as Modified Consolidated Corridors

Page D-30 (Table D-4, Appendix D):

The following species information should be added to Table D-4 (Appendix D):

TABLE D-4 Special Status Species That Could Occur within the Project Area

Species	Federal Status	State Status	Distribution within Maine and the Project Area	Habitat Information and Reason for Rarity
Invertebrates				
Brook floater (*Alasmidonta varicose*)	–	SC	Eastern two-thirds of the State. Known occurrence in the Machias River in the vicinity of the crossing of the Modified Consolidated Corridors Route.	Riffles and sandy shoals in creeks and small rivers. Populations throughout range impacted by reduced water quality such as eutrophication and siltation.
Ebony boghaunter (*Williamsonia fletcheri*)	–	SC	Southern two-thirds of the State. Documented occurrence within 0.6 mi (1 km) of the Modified Consolidated Corridors Route in Baileyville.	Bogs and fens, especially quaking sphagnum bogs. Populations potentially affected by habitat degradation and loss from harvesting of peat moss and fuel peat, and cranberry farming; pollution from toxics; and water-level alterations.
Amphibians				
Four-toed salamander (*Hemidactylium scutatum*)	–	SC	Southwestern and central/southcentral portions of the State. Uncommon to rare.	Wet woodlands (preferably with sphagnum moss), shallow woodland pools, tamarack bogs. Primary potential threat is loss/degradation of habitat.

TABLE D-4 (Cont.)

Species	Federal Status	State Status	Distribution within Maine and the Project Area	Habitat Information and Reason for Rarity
Amphibians (Cont.)				
Northern leopard frog (*Rana pipiens*)	–	SC	Found throughout the State. Common.	Wet open meadows and fields and wet woods during summer months. Populations have declined in some areas due to habitat loss and degradation, overexploitation, interactions with non-native species, and unknown causes; the overall range, however, remains essentially undiminished.
Reptiles				
Wood turtle (*Glyptemys insculpta*)	–	SC	Found throughout the State. Infrequent to common.	Slow-moving meandering streams with sandy bottoms and overhanging alders; fields, woods, and roadsides in summer. Declining throughout its range (northeastern U.S. and adjacent Canada); populations seriously impacted by illegal collection and by heavy recreation use of occupied habitats.
Birds				
Least bittern (*Ixobrychus exilis*)	–	SC	Found in southern portion of the State. Uncommon to rare.	Wetlands, preferably with tall vegetation. Populations declining in many parts of North American range due to draining, filling, and degradation of marshes and probably by environmental contaminants.
Black-crowned night heron (*Nycticorax nycticorax*)	–	SC	Found in southern portion of the State. Rare.	Varied aquatic and wetland habitats. Has declined in some areas of its North American range due to disturbance, degradation, and/or destruction of nesting and foraging areas.

TABLE D-4 (Cont.)

Species	Federal Status	State Status	Distribution within Maine and the Project Area	Habitat Information and Reason for Rarity
Birds (Cont.)				
Cooper's hawk (*Accipiter cooperii*)	–	SC	Breeding birds found throughout the State. Rare.	Deciduous or mixed woodlands that are dense or open, scattered woodlands interrupted with open fields, floodplain forests, and wooded swamps. Overall North American population stable. Deforestation is a current threat and may become increasingly important; required habitat is under pressure for forest product harvest and development.
Northern goshawk (*Accipiter gentilis*)	–	SC	Breeding birds found throughout the State; present year-round in southern half of the State. Rare to uncommon.	Interiors of remote, heavily wooded coniferous and mixed forests. Habitat loss or degradation from timber harvest is the principal threat to breeding populations.
Eastern screech owl (*Otus asio*)	–	SC	Present year-round in southern half of the State. Rare.	Shade trees in towns, orchards, small woodlots, open woodlands; requires cavities in trees. Population declines observed in some portions of North American range attributed to conversion of woods to residential areas and increased habitat fragmentation.
Short-eared owl (*Asio flammeus*)	–	SC	Breeding birds in eastern half of the State; overwintering birds in the southeastern portion of the State. Uncommon.	Open grasslands, plains, marshes, dunes; requires extensive open grasslands with abundant rodents. Populations have declined over most of their former North American range due to habitat loss.

TABLE D-4 (Cont.)

Species	Federal Status	State Status	Distribution within Maine and the Project Area	Habitat Information and Reason for Rarity
Birds (Cont.)				
Olive-sided flycatcher (*Contopus cooperi*)	–	SC	Breeding birds throughout all but extreme southeastern portion of the State. Uncommon to rare.	Coniferous (spruce) forest near edges and clearings; often along wooded streams and borders of bogs; burned-over areas with a few dead trees for perching. Large rangewide decline (68% between 1966 and 2000) across North America; causes of decline not known.
Rusty blackbird (*Euphagus carolinus*)	–	SC	Breeding birds throughout upper two-thirds of the State. Uncommon to common.	Swamps, tree-bordered marshes, beaver ponds, bogs, and stream borders with alder and willow thickets; rarely in fields. Large (90%) rangewide decline over last 30 years; destruction of wooded wetlands on breeding and wintering grounds and acid precipitation have been suggested as causes for observed decline.
Eastern meadowlark (*Sturnella magna*)	–	SC	Breeding birds throughout the State; present year-round in southern half of the State. Uncommon.	Open farmlands, especially with pastures, hayfields, and grassy meadows; may use areas with widely scattered shrubs and may favor moist lowland. Populations declining across range, with highest rates of decline observed in the Northeast. Decline is generally attributed to loss of nesting habitat due to changes in land use (conversion of grassland into suburbs).

TABLE D-4 (Cont.)

Species	Federal Status	State Status	Distribution within Maine and the Project Area	Habitat Information and Reason for Rarity
Birds (Cont.)				
Vesper sparrow (*Pooecetes gramineus*)	–	SC	Breeding birds found throughout the State. Uncommon.	Short-grass meadows, pastures, hayfields, cultivated grain fields, dry open uplands, burned and cutover areas in forests, country roadsides. Major regional decline in eastern North America, due in part to reduced quality or availability of grasslands resulting from changing agricultural practices.
Mammals				
Long-tailed shrew (*Sorex dispar*)	–	SC	Found in the west-central and north-central portions of the State. Rare.	Cold, deep coniferous forests, typically near moss-covered rocks and logs or woody talus slopes; also in deciduous or mixed forests. Populations may be more abundant than thought due to difficulty of sampling occupied habitat; local populations may incur habitat loss under some types of land development.
Little brown bat (*Myotis lucifugus*)	–	SC	Found throughout the State. Common.	Males roost in valleys near streams and marshes; female roost sites include hollow trees. Widespread throughout its range and has adapted well to using human structures for resting and nursery sites. Maine population stable, but hibernation sites and hibernators sensitive to human disturbance.

TABLE D-4 (Cont.)

Species	Federal Status	State Status	Distribution within Maine and the Project Area	Habitat Information and Reason for Rarity
Mammals (Cont.)				
Big brown bat (*Eptesicus fuscus*)	–	SC	Found throughout the State. Common.	Hollow trees in wooded areas. Widespread throughout U.S. range; regularly uses man-made structures for nesting and overwintering. Maine population stable, but hibernation and nursery sites and individuals in these sites sensitive to human disturbance.
Silver-haired bat (*Lasionycteris noctivagans*)	–	SC	Found throughout the State. Rare to uncommon.	Forested areas near lakes and streams; roosts in foliage of trees, tree cavities, and under loose bark. Maine status unknown, although hibernation sites and hibernators sensitive to human disturbance.
Red bat (*Lasiurus borealis*)	–	SC	Found throughout the State. Rare to uncommon.	Roosts in trees in wooded areas; most numerous along fence rows or forest edges. Maine status unknown.
Hoary bat (*Lasiurus cinerus*)	–	SC	Found throughout the State. Rare.	Roosts in trees in wooded areas; prefers coniferous forests but also occurs in deciduous woods and woodland edges, hedgerows, and trees in city parks. Maine status unknown.

4 REFERENCES

Bard, R., 2005, "Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect," personal communication from Bard (Assistant Regional Wildlife Biologist, Maine Department of Inland Fisheries and Wildlife, Jonesboro, Maine) to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 11.

Clement, J.L., 2005, "Northeast Reliability Interconnect Transmission Line," personal communication from Clement (U.S. Army Corps of Engineers, New England District, Concord, Mass.) to B. Alafat (U.S. Environmental Protection Agency, Boston, Mass.), Oct. 20.

Cowardin, L.M., et al., 1979, *Classification of Wetland and Deepwater Habitats of the United States*, FWS/OBS-79/31, U.S. Fish and Wildlife Service, Biological Services Program, Washington, D.C.

Delgiudice, F.J., 2005, "U.S. Army Corps of Engineers Comments on Draft Environmental Impact Statement (DEIS) for the Northeast Reliability Interconnect Project," personal communication from Delgiudice (U.S. Army Corps of Engineers, New England District, Concord, Mass.) to J. Pell (U.S. Department of Energy, Office of Fossil Energy, Washington, D.C.), Sept. 7.

Faloon Saucier, D., 2005, "Distinct Segment Population Waterbodies," personal communication from Faloon Saucier (Devine Tarbell & Associates, Inc., Winterport, Maine) to W. Vinikour (Argonne National Laboratory, Argonne, Ill.), Oct. 29.

Higgins, E.A., 2005, "U.S. Environmental Protection Agency Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect," personal communication from Higgins (U.S. Environmental Protection Agency, Region 1, Boston, Mass.) to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 7.

McAdam, R., 2005, "Maine Department of Environmental Protection Permit, personal communication from McAdam (Emera Energy, Halifax, Nova Scotia, Canada) to A. Como and J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Nov. 1.

McLachlan, G., 2005, "ATV Damage in Eastern Maine," personal communication from McLachlan (Duke Energy, Waltham, Mass.) to G. Paquette (TRC Corporation, South Portland, Maine), Nov. 3.

Paquette, G., 2005a, "Myra Camps Reroute Figure," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to W. Vinikour (Argonne National Laboratory, Argonne, Ill.), Jan. 15.

Paquette, G., 2005b, "Pickerel Pond Reroute Figure," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to W. Vinikour (Argonne National Laboratory, Argonne, Ill.), Jan. 15.

Paquette, G., 2005c, "Alternative Route Figures," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to W. Vinikour (Argonne National Laboratory, Argonne, Ill.), May 25.

Paquette, G., 2005d, "Information on Vernal Pools," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to W. Vinikour et al. (Argonne National Laboratory, Argonne, Ill.), Oct. 14.

Paquette, G., 2005e, "Bald Eagle Surveys," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to J. Pell et al. (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 17.

Paquette, G., 2005f, "Vegetation Maintenance of Wetlands," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to I. Hlohowskyj et al. (Argonne National Laboratory, Argonne, Ill.), Oct. 18.

Paquette, G., 2005g, "Flappers/Ball Markers," personal communication from Paquette (TRC Environmental Corporation, South Portland, Maine) to W. Vinikour et al. (Argonne National Laboratory, Argonne, Ill.), Oct. 20.

Penney, W.C., Jr., 2005, "Maritimes & Northeast Pipeline, L.L.C. Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect," personal communication from Penney (Vice President and General Manager, M&N Management Company, Managing Member of Maritimes & Northeast Pipeline, L.L.C., Waltham, Mass.) to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 11, 2005.

Raddant, A.L., 2005, "Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect," personal communication from Raddant (Regional Environmental Officer, U.S. Department of the Interior, Office of Environmental Policy and Compliance, Boston, Mass.), to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Oct. 31.

Shettleworth, E.G., Jr., 2005, "Comments on the Draft Environmental Impact Statement for the Bangor Hydro-Electric Company Northeast Reliability Interconnect," personal communication from Shettleworth (State Historic Preservation Officer, Maine Historic Preservation Commission, Augusta, Maine) to J. Pell (U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability, Washington, D.C.), Sept. 28.

Sloan, S., 2005a, "Public Hearing Comments," personal communication from Sloan (Bangor Hydro-Electric Company, Bangor, Maine) to W. Vinikour (Argonne National Laboratory, Argonne, Ill.), Oct. 13.

Sloan, S., 2005b, "Ownership of Wood in Easement," personal communication from Sloan (Bangor Hydro-Electric Company, Bangor, Maine) to W. Vinikour (Argonne National Laboratory, Argonne, Ill.), Oct. 31.

5 DISTRIBUTION LIST

U.S. CONGRESS

U.S. HOUSE OF REPRESENTATIVES

The Honorable Thomas H. Allen
The Honorable Michael Michaud

U.S. HOUSE OF REPRESENTATIVES COMMITTEES

The Honorable Joe Barton, Chairman, Committee on Energy and Commerce
The Honorable Rick Boucher, Ranking Minority Member, Subcommittee on Energy and Air Quality, Committee on Energy and Commerce
The Honorable John D. Dingell, Ranking Minority Member, Committee on Energy and Commerce
The Honorable Ralph M. Hall, Chairman, Subcommittee on Energy and Air Quality, Committee on Energy and Commerce

U.S. SENATE

The Honorable Susan M. Collins
The Honorable Olympia J. Snowe

U.S. SENATE COMMITTEES

The Honorable Lamar Alexander, Chairman, Subcommittee on Energy, Committee on Energy and Natural Resources
The Honorable Jeff Bingaman, Ranking Minority Member, Committee on Energy and Natural Resources
The Honorable Pete V. Domenici, Chairman, Committee on Energy and Natural Resources
The Honorable Byron L. Dorgan, Ranking Minority Member, Subcommittee on Energy, Committee on Energy and Natural Resources

FEDERAL GOVERNMENT

Mr. Jay Clement, U.S. Army Corps of Engineers
Mr. Tom Comish, Manager, Sunkhaze Meadows National Wildlife Refuge
Mr. A. Forester Einarsen, NEPA Coordinator, Office of Environmental Policy, CECW-PC, U.S. Army Corps of Engineers
Mr. Frank Keel, Director, Eastern Region Office, Bureau of Indian Affairs, U.S. Department of the Interior
Mr. William Kennedy, Regional Environmental Officer, Federal Emergency Management Agency, Region I, U.S. Department of Homeland Security
Mr. Don Klima, Director, Office of Federal Agency Programs, Advisory Council on Historic Preservation
Ms. Rita Laford, Assistant Director for NEPA, U.S. Forest Service, U.S. Department of Agriculture
Ms. Wende Mahaney, Fish and Wildlife Biologist, U.S. Fish and Wildlife Service, U.S. Department of the Interior
Mr. Sean McDermott, Northeast Region, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce
Mr. Jeff Murphy, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce
Mr. David Reese, USM/Administrative Services, Safety and Environment Program, U.S. Department of Homeland Security
Mr. Mark Robinson, Director, Office of Energy Projects, Federal Energy Regulatory Commission
Mr. Willie R. Taylor, Director, Office of Environmental Policy and Compliance, U.S. Department of the Interior
Mr. Timothy L. Timmerman, Dept. of Energy Reviewer, Office of Environmental Review, U.S. Environmental Protection Agency, Region I
Ms. Jean Vorhees, U.S. Environmental Protection Agency, Region I

MAINE STATE AND LOCAL GOVERNMENT

THE GOVERNOR

The Honorable John E. Baldacci, Governor of Maine
Tom Federle, Senior Counsel

STATE LEGISLATURE

Rep. Herbert Adams, District 119
Rep. Patricia Blanchette, District 16
Rep. Lawrence Bliss, Chair, Committee on Utilities and Energy
Rep. Philip Cressey, Jr., District 63
Rep. Robert S. Duchesne, District 13
Rep. Michael Edward Dunn, District 18
Rep. Harold Emery, District 32
Rep. Sean Faircloth, District 17
Rep. Charles D. Fisher, District 21
Rep. Darren M. Hall, District 20
Rep. Howard McFadden, District 30
Rep. Everett W. McLeod, Sr., District 11
Rep. Jacqueline Norton, District 15
Rep. Anne Perry, District 31
Rep. Kimberley C. Rosen, District 40

Senator Philip L. Bartlett, II, Chair, Committee on Utilities and Energy
Senator Lynn Bromley, Senate District 7
Senator Dennis S. Damon, Senate District 28
Senator Joseph C. Perry, Senate District 32
Senator Kevin L. Raye, Senate District 29
Senator Richard W. Rosen, Senate District 31
Senator Margaret Rotundo, Senate District 16
Senator Elizabeth M. Schneider, Senate District 30

STATE GOVERNMENT

Commissioner Kurt Adams, Public Utilities Commission
Mr. Erik Anderson, Maine Department of Conservation
Ms. Cynthia Bertocci, Executive Analyst, Maine Board of Environmental Protection
Mr. Marc Caron, Maine Department of Inland Fisheries and Wildlife
Mr. Vasco Carter, Maine Department of Inland Fisheries and Wildlife
Ms. Robin Clukey, Project Manager, Maine Department of Environmental Protection
Mr. Patrick Damon, Administrative Director, Maine Public Utilities Commission

Mr. Stephen Diamond, Commissioner, Public Utilities Commission
Mr. Norm Dube, Maine Atlantic Salmon Commission
Ms. Marcia Spencer Famous, Senior Planner, Land Use Regulation Commission
Mr. David Littell, Deputy Commissioner, Office of the Commissioner of Environmental Protection
Ms. Toni Pied, Information Manager, Maine Natural Areas Program
Commissioner Sharon Reishus, Public Utilities Commission
Mr. Tom Schaeffer, Maine Department of Inland Fisheries and Wildlife
Mr. Earle Shettleworth, Jr., Director, Maine Historic Preservation Commission
Mr. Lee Sochasky, Executive Director, St. Croix International Waterway Commission
Mr. Steve Timpano, Permit Coordinator, Maine Department of Inland Fisheries and Wildlife

LOCAL GOVERNMENT

Mr. Charles Adams, First Selectman, Town of Greenbush
Mr. Glenn Aho, Town Manager, Town of Lincoln
Ms. Rebecca Albright, Code Enforcement Officer, Towns of Great Pond and Aurora
Ms. Joan Archer, Clerk, Town of Great Pond
Mr. Stephen M. Bost, City Manager, City of Brewer
Mr. Kenneth Braza, First Assessor/Chair, Macwahoc Plantation
Ms. Joan Brooks, First Selectman, Town of Eddington
Mr. Allan Brown, First Selectman, Town of Winn
Mr. Neil Butler, First Selectman/Assessor, Town of Amherst
Mrs. Ellen Campbell, First Selectman/Chair, Town of Holden
Mr. William Carpenter, Code Enforcement Officer, Town of Milford
Mr. William Chesley, First Selectman, Town of Woodville
Mr. Joseph Clark, Town Manager, Mattawamkeag
Mr. Stephen Condon, Code Enforcement Officer, Town of Holden
Mr. Jerry Davis, Code Enforcement Officer, Town of Lincoln
Mr. Richard Decarteret, First Selectman/Assessor, Town of Beddington
Ms. Melissa Doane, Town Manager, Town of Bradley
Ms. Anita Duerr, First Assessor/Chair, Carroll Plantation
Mr. Glen Durling, First Selectman/Chair, Town of Wesley
Mr. Oscar Emerson, Councilor, Town of Bradley
Ms. Joan Emery, Town Manager, Reed Plantation
Mr. Joseph Ferris, Council Chair, City of Brewer
Mr. Richard Fish, Code Enforcement Officer, Town of Greenbush
Ms. Marybeth Foley, Chairman, Town of Orient
Mr. Jeff Gifford, Council Chair, Town of Lincoln
Ms. Deanne Greenlaw, Town Clerk, Town of Alexander
Mr. James Hancock, Town Manager, Town of Milford
Ms. Maryann Hanscom, First Assessor/Chair, Reed Plantation
Mr. Richard Harriman, Code Enforcement Officer, Town of Orrington
Mr. Scott D. Harriman, Town Manager, Baileyville
Ms. Grace Hiland, Clerk, Town of Princeton

Mr. Robert House, Jr., First Selectman, Town of Lee
Mr. Lew Hutchins, Code Enforcement Officer, Town of Beddington
Mr. Leslie Hutchinson, First Selectman/Assessor, Town of Great Pond
Mr. Temple Ireland, First Selectman, Town of Chester
Mr. Rickey Irish, First Selectman, Town of Topsfield
Mr. Dexter C. Johnson, Town Manager, Town of Orrington
Mr. Donald Jordon, First Selectman/Assessor, Town of Aurora
Mr. Vern Lemieux, Administrator, Town of Mattawamkeag
Mr. Robert Littlefield, Town Manager, Town of Greenbush
Ms. Norma Malone, Town Manager, Town of Haynesville
Mr. Patrick McLaughlin, First Selectman/Assessor, Town of Haynesville
Ms. Tammy McLellan, Town Clerk, Town of Topsfield
Mr. Brian Melvin, First Selectman/Assessor, Town of Clifton
Mr. James Moffitt, Code Enforcement Officer, Town of Baileyville
Mr. William Moody, Code Enforcement Officer, Town of Wesley
Mr. Lesley Moulton, First Assessor/Chair, Glenwood Plantation
Mr. Michael Noble, Code Enforcement Officer, Town of Orient
Mr. Charles Norburg, Code Enforcement Officer, Towns of Bradley and Eddington
Mr. John Papke, First Selectman, Town of Princeton
Mr. Daniel Phelps, First Selectman, Town of Waite
Mr. James Porter, Code Enforcement Officer, Town of Alexander
Mr. Dale Randall, Sr., First Selectman, Town of Passadumkeag
Ms. Linda Rayner, First Selectman, Town of Baileyville
Mr. Francis Richards, First Selectman, Town of Milford
Mr. David Russell, Code Enforcement Officer, City of Brewer
Mr. Howard Seavey, First Selectman/Chair, Town of Alexander
Mr. Allan Shorey, First Selectman/Assessor, Town of Osborn
Ms. Alicia Silkey, Town Clerk, Town of Orient
Mr. James Slowe, Code Enforcement Officer, Towns of Princeton, Waite, and Topsfield
Mr. Daniel Smith, First Selectman, Town of Springfield
Mr. Russell J. Smith, Town Manager, Town of Eddington
Ms. Robin Theriault, First Selectman, Town of Enfield
Ms. Theresa Thurlow, Town Manager/Code Enforcement Officer, Town of Enfield
Mr. Dwight Tilton, Code Enforcement Officer, Town of Lee
Mr. Larry Varisco, Town Manager, Town of Holden
Mr. Coburn Wallace, First Selectman/Assessor, Town of Crawford
Mr. Paul White, Chairman, Town of Orrington
Mr. John Whitehouse, First Selectman, Town of Mattawamkeag

COUNCILS

Mr. Bill Cherry, Coordinator, Machias and E. Machias Rivers Watershed Council
Ms. Tracey Gamache, Coordinator, Narraguagus and Pleasant Rivers Watershed Council

NATIVE AMERICAN REPRESENTATIVES

The Honorable Brenda Commander, Chief, Houlton Band of Maliseet Indians
The Honorable Melvin Francis, Governor, Passamaquoddy Tribe, Pleasant Point Reservation
The Honorable Robert Newell, Governor, Passamaquoddy Tribe, Indian Township Reservation
The Honorable William W. Phillips, Jr., Chief, Aroostook Band of Micmac Indians
The Honorable James Sappier, Chief, Penobscot Indian Nation

COMPANIES

Mr. Frank Bailey, Project Director, Duke Energy
Mr. Scott Beal, Domtar, Inc.
Mr. Curt Beveridge, Central Maine Power
Mr. Glenn Brown, New Brunswick Power
Mr. John Bryant, International Paper Company
Mr. Jim Dean, Eastern Maine Electric Cooperative
Mr. Gary Donovan, International Paper Company
Mr. Matt Goldberg, ISO-New England
Mr. Scott Hallowell, Eastern Maine Electric Cooperative
Ms. Marylu Hanley, Duke Energy
Mr. John Holden, Director, Business Development, Eastern Maine Development Corporation
Mr. David Hooper, International Paper Company
Mr. Tom Howard, Domtar, Inc.
Mr. Dan Hudnut, Wagner Forest Management
Mr. Steve LeBlanc, International Paper Company
Mr. Peter Lind, Vermont Electric Company
Ms. Pamela McKay, Manager, Public Relations, New Brunswick Power
Mr. Gus McLachlan, Maritimes and Northeast Pipeline, L.L.C.
Mr. Frank Perry, Duke Energy
Mr. Brian Scott, New Brunswick Power
Mr. Steve Sloan, Bangor Hydro-Electric Company
Mr. Will Smith, New Brunswick Power
Mr. Don Thompson, Maritimes and Northeast Pipeline Operations

PUBLIC INTEREST GROUPS

Mr. David Brunner, Chief Operating Officer, National Fish and Wildlife Foundation
Ms. Jennifer D. Burns, Maine Audubon
Mr. Amos Eno, Executive Director, New England Forestry Foundation
Ms. Lisa Gover, Program Director, National Tribal Environmental Council
Mr. David Hawkins, Director, Climate Center, Washington Office,
Natural Resources Defense Council
Ms. Cathy Johnson, North Woods Project Director, Natural Resources Council of Maine
Ms. Jacqueline Johnson, Executive Director, National Congress of American Indians
Mr. Steve Keith, Executive Director, Downeast Lakes Land Trust
Mr. Steven Koenig, Executive Director, Project SHARE
Mr. Fred Krupp, President, Environmental Defense
Ms. Elizabeth Merritt, Deputy General Counsel, National Trust for Historic Preservation
Mr. Dwayne Shaw, Executive Director, Downeast Salmon Federation
Ms. Kassie Siegel, Air, Climate and Energy Director, Center for Biological Diversity
Mr. Dave Tobey, Grand Lake Stream Guides Association
Mr. Bryan Wells, President, Friends of Sunkhaze Meadows

INDIVIDUALS

Mr. Scott Beal, Domtar, Inc.
Mr. James Black
Mr. Thomas Clark
Mr. Chris DeBeck
Mr. Douglass S. Gray, Jr.
Mr. Adam Greenlaw
Ms. Marylu Hanley, Duke Energy
Mr. David Hunter
Mr. Bill Marshall
Mr. Joe McKeever
Mr. John Morrison
Mr. Matthew Nelson
Ms. Sharon Sudbay

PUBLIC LIBRARIES

Bangor Public Library
Brewer Public Library
Calais Free Library
Orrington Public Library
Princeton Public Library
Woodland Public Library