



Committee on Appropriations and Financial Affairs  
c/o Office of Fiscal and Program Review  
5 State House Station  
Augusta, ME 04333

February 16, 2023

Dear Senator Rotundo, Representative Sachs, and Members of the Committee:

Thank you for the opportunity to submit comments on LD 258, An Act Making Unified Appropriations and Allocations from the General Fund and Other Funds for the Expenditures of State Government and Changing Certain Provisions of the Law Necessary to the Proper Operations of State Government for the Fiscal Years Ending June 30, 2023, June 30, 2024 and June 30, 2025, specifically, the proposed budget initiatives and language related to the Maine Department of Environmental Protection.

Maine Audubon supports the proposed budget initiatives and language related to the Maine Department of Environmental Protection (Department, DEP) because each is essential to the Department fulfilling its responsibility to protect and restore Maine's natural resources and enforce the state's environmental laws. Of particular interest to our organization is the reorganization of several Environmental Specialist positions to Environment Licensing positions—essentially, reclassification that will result in greater pay for those positions.

Maine Audubon strongly supports any and all initiatives—in and beyond the proposed budget—that will strengthen the Department's ability to recruit and retain employees. Currently, many Department positions are vacant, primarily because the pay is not commensurate with the position's required skills and responsibility. Position vacancies are hindering the Department's ability to do its best work protecting and restoring Maine's natural resources.

For example, it is our understanding that Department staff are exceedingly challenged to meet permit review deadlines, at a time when the state is experiencing significant growth and development pressure. Relieving this pressure is not just about relieving stress—it's about giving employees the space to consider potential natural resource impacts and carefully balance development needs.

Expanding DEP staff capacity will also allow the Department to fulfill rulemaking needs identified in Maine's Climate Action Plan. Specifically, the 130th Legislature directed the DEP

and other state agencies to conduct a comprehensive review of their associated statutes and rules and to recommend to the legislature revisions to incorporate consideration of the best available science on sea level rise in Maine, specifically, 1.5 feet of relative sea level rise by 2050 and 3.9 feet by 2100, into administration of those laws. It is our understanding that very little—if not none—of that rulemaking has happened. This is not a knock on the Department—they have a lot on their plate. However, the urgency of climate change demands that the Department act as soon as possible. Greater staff capacity will help the Department act.

Supporting the proposed budget initiatives and language in the Department's budget, as well as considering other opportunities to expand the Department's capacity, will allow the Department to do their best work. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Francesca Gundrum', with a stylized flourish at the end.

Francesca "Ches" Gundrum  
Policy Advocate