



Committee on Energy, Utilities, and Technology
c/o Legislative Information Office
100 State House Station
Augusta, ME 04333

February 18, 2021

RE: LD 82, Resolve, To Provide for Participation of the State in the Planning and Negotiations for the Atlantic Loop Energy Project

Dear Senator Lawrence, Representative Berry, and Members of the Committee:

Thank you for the opportunity to submit testimony in support of LD 82, Resolve, To Provide for Participation of the State in the Planning and Negotiations for the Atlantic Loop Energy Project, on behalf of Maine Audubon and our 30,000 members and supporters.

Make no mistake: Our support for this bill should not be confused with support for the Atlantic Loop Energy Project. Like many, we know very little about it, though we are skeptical of any project that may incentivize further development of large hydro-power facilities, known for blocking migration routes for fish, flooding important wildlife habitat, and generating greenhouse gas emissions from the decomposition of organic material trapped in the reservoirs. Instead, we support the principle of advanced planning—particularly land use planning—for transmission.

This bill would give Maine a seat at the table early in the planning and negotiation stage of the Atlantic Loop project and would, we hope, prevent a scenario in which the project reaches Maine regulatory bodies and decision-makers “fully baked” and with little opportunity to modify the project to meet Maine’s needs, including its land use planning and environmental needs. The bill is consistent with Maine Audubon’s years-long effort to encourage thoughtful siting of new renewable energy development, including associated transmission.

In order for Maine to meet our ambitious and necessary greenhouse gas emission reduction targets, we must significantly increase renewable energy development. New renewable energy generation at the scale necessary to meet those targets will require more transmission capacity. But like all development, including all energy production, renewable energy resources and transmission impart their own ecological footprint on the earth and can have negative impacts on wildlife and habitats, as well as cumulative negative impacts across ecologically significant landscapes.

Transmission corridors can have significant negative effects on wildlife populations and habitats. Linear habitat alterations, like transmission corridors, cut the natural landscape into

smaller pieces, which is problematic for species that need large unbroken blocks of habitat to thrive. For other species, fragmenting features may cut them off from important pieces of their habitat like breeding grounds or high quality feeding areas. Still other animals are unable to traverse the opening—such as salamanders crossing a dry, open right-of-way on a hot summer day—while other species will not cross the opening because it makes them vulnerable to predators. These are just some of the negative impacts of transmission corridors on wildlife.

But transmission is necessary; we need to move renewable energy from where it is generated to where it will be used. Thankfully, many strategies exist to avoid or minimize these negative impacts, including:

- Avoid rare, sensitive, and high value habitats, including important wildlife movement corridors (used daily, seasonally, or over a lifespan) and highly resilient landscapes;
- Prior to development, in order to avoid or minimize site-specific impacts, conduct surveys to identify and understand site-specific wildlife habitats;
- Locate projects near existing development;
- Evaluate potential cumulative impacts, considering existing development and potential for future development at a site; and
- Co-locate new transmission lines into existing right-of-ways, roads, or other existing man-made linear features.

Each of these strategies, while reasonably straight-forward, require advanced planning. Ideally, new transmission projects would select their location based on these strategies, not based solely on the path of least economic or political resistance. LD 82 would allow the Maine Department of Environmental Protection and our natural resource agencies to provide habitat data at the early planning stages, which should help establish a line that avoids or minimizes negative natural resource impacts.

All that said, Maine Audubon understands that the Atlantic Loop Energy Project seeks to use existing transmission. This is consistent with the thoughtful planning principles that we advocate for. However, still more strategies can be utilized to minimize the negative impact of transmission corridors on wildlife and wildlife habitat, each of which should be considered and adopted early in the planning process. These include specific vegetation management techniques, such as vegetation buffers around water bodies, “feathering” to maximize interference with transmission lines while allowing for maximum tree cover, invasive plant species management, and more. By considering these strategies early, the cost of these strategies can be incorporated in early project planning and may result in a more simplified permitting process.

In summation, Maine Audubon encourages the Committee to support LD 82 in order for Maine to influence better environmental outcomes associated with the Atlantic Loop Energy Project.

Sincerely,



Eliza Donoghue, Esq.
Director of Advocacy