

**STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

and

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

IN THE MATTER OF:)	
)	
CENTRAL MAINE POWER COMPANY)	
25 Municipalities, 13 Townships/Plantations,)	
7 Counties)	
L-27625-26-A-N)	APPLICATION FOR SITE LOCATION OF
L-27625-TB-B-N)	DEVELOPMENT ACT PERMIT AND
L-27625-2C-C-N)	NATURAL RESOURCES PROTECTION
L-27625-VP-D-N)	ACT PERMIT FOR THE NEW ENGLAND
L-27625-IW-E-N)	CLEAN ENERGY CONNECT
)	
CENTRAL MAINE POWER COMPANY)	
NEW ENGLAND CLEAN ENERGY CONNECT)	
SITE LAW CERTIFICATION SLC-9)	

**GROUPS 2 AND 10’S APPEAL OF FIFTH PROCEDURAL ORDER
PURSUANT TO DEP RULE CHAPTER 3 § 4(D) and
ME LUPC CHAPTER 5 § 5.11(4)**

Intervenor Group 2 and Intervenor Group 10 (collectively, “Groups 2 and 10”) by and through their attorneys, BCM Environmental & Land Law, PLLC, make this expedited appeal to the Commissioner of the Department of Environmental Protection and objection to the Land Use Planning Commission, of certain decisions of the Presiding Officers in the Jointly issued Fifth Procedural Order dated March 13, 2019 (Joint Order 5) in the above captioned matter.

Specifically, we appeal and object to the decisions to strike the following:

- Revised cover pages for Groups 2 and 10 Witnesses’ Prefile Testimony.

- Robert Merchant Supplemental Exhibit 7.
- Witness Greg Caruso's Prefile Testimony.

First, the premise for prefile testimony deadlines is to ensure a fairness to the process. All parties were expected to provide their substantive testimony and exhibits by February 28, Third Procedural Order dated February 5, 2019. In all substantive respects, Groups 2 and 10 witnesses met that filing deadline. None of the defects in the above items were substantive and the admission of each would not in any way prejudice the Applicant or create an unfair advantage for the Intervenors in Groups 2 and 10. Taking each of the above the items separately, we respectfully request that the decision to strike be overruled and each item be admitted.

The revised cover pages were submitted to clarify that the testimony was filed in the joint dockets. It was not a substantive alteration of the testimony but rather was intended to alleviate confusion since it was raised in CMP's objections. Filing it after the deadline for submission of the prefile created no unfairness to CMP or any of the Intervenors. Acceptance of it would have created no bias favoring any of Groups 2 and 10 Intervenors. In short, the cover pages were simply conforming the caption to that which is being used in this joint proceeding. No harm is done but clarity is attained by admission.

Robert Merchant's Exhibit 7 was filed to assist the Commission, the DEP, CMP and all Intervenors by simply combining already filed portions of his testimony with already filed exhibits. As with the prefile cover pages, this was not a substantive submission but one which the witness, Mr. Merchant, believed would make for smoother and clearer reading of his testimony in direct relationship to his exhibits. In fact, it would seem that out of all the parties to the proceeding, CMP would actually find it more useful in preparing its cross examination of Mr.

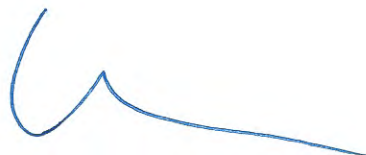
Merchant to have one exhibit combining much of Mr. Merchant's testimony with all of his exhibits. Again, no unfairness or bias is created by allowing this to come in.

Mr. Caruso's submitted prefile testimony did not include his signature page with date showing that he had signed under oath. It also did not include his exhibits. That failure was entirely due to an error in my office. We had his signature page and all of his exhibits but due to a clerical mistake, the pdf of his prefile testimony was filed instead of the combined pdf including his signature page and the exhibits. (See attached complete testimony of Mr. Caruso and affidavit of Stacy Laughton). As the date on the signature page makes clear, Mr. Caruso did in fact sign his testimony under oath. The page was simply not included in the pdf that was filed. Moreover, pursuant the Hearing Rules, Chapter 3, § 19 (B), and LUPC Rules for the Conduct of Public Hearings, Chapter 5, § 5.08(3) all witnesses must be sworn at the hearing. At the hearing, since this witness would be questioned on his prefile testimony, he would need to adopt his prefile testimony which would mean his prefile would be sworn to again. Thus, failing to submit the signature page by the deadline purely due to a clerical error should not result in the witness' testimony being excluded from the proceeding. Such a harsh result is contrary to the purpose of the filing deadline rules and runs counter to due process and fairness. Additionally, the DEP, LUPC, CMP and all Intervenors received the testimony so this again is not an attempt to submit substantive testimony after the deadline. His testimony should therefore be allowed in.

For all of the foregoing reasons, Groups 2 and 10 request that the items set forth herein that were stricken by Joint Order 5, be admitted.

Respectfully Submitted,
Intervenor Group 2 and Intervenor Group 10
By their attorneys,

Dated: March 15, 2019



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TESTIMONY OF GREG CARUSO

1 **Please state your name and address.**

2 My name is Greg Caruso. My address is 81 West Shore Rd, Caratunk, Maine 04925.

3 **What is the name of your organization and business address?**

4 Maine Guide Service, LLC, PO Box 81, Caratunk, Maine 04925.

5 **What occupations have you had in the Caratunk area?**

6 For the past 26 years, I have worked as a Maine guide in the outdoor industry, and
7 twenty-four of those years as a whitewater guide, Master Maine Guide and year-
8 round manager in charge of hiring, training, staffing, and scheduling for one of the
9 largest outfitters in New England. Working as a hunting, ATV and snowmobile
10 guide, I have brought hundreds of guests up to Johnson and Coburn mountains. As a
11 whitewater and fishing guide, I have brought thousands of guests through the
12 Kennebec River gorge. In addition to that, I have logged thousands of hours as a
13 snowmobile groomer operator and have groomed every trail from the Forks to Grand
14 Falls, to Bald Mountain, to Parlin Pond, Greenville, Rockwood and Bingham. I also
15 work as a contractor for the ATC on the Appalachian Trail, ferrying over 6000 hikers
16 the last 3 years. I hope that you would consider me an expert in my field.

17 **Why did you choose to intervene in these proceedings?**

18 One thing that all of these years have revealed to me, is that people come to Maine to
19 get away from the modern industrial world, to escape if only for a few hours or days
20 from the super highways of traffic, the madness of work and schedules, tall steel and
21 concrete structures, and never-ending noise and bright lights. Where else can you

1 travel only a few hours to get complete solitude, and peace from those things? In all
2 of my interactions with the thousands upon thousands of guests, the comments
3 remain the same, “Wow! This is amazing!” or “Such a beautiful place!” or “It’s so
4 quiet here!” or “This is unspoiled wilderness!” or “Such an incredible getaway!”
5 There has never been anyone that said, “Looks like great place for a power line!” or
6 “These ridges should have some wind towers!” or “I’d like to see some blinking red
7 light at night over that mountain!” or “We need some red balls hanging over this
8 awesome gorge!”

9 Our most critical assets in this region for tourism are our mountains and waterways.
10 This is hallowed ground. It’s absolutely critical that we keep these places intact,
11 particularly in those remote towns or villages that rely on it for their livelihoods.
12 Is there a public need for this project? I am here to give a resounding NO to that
13 question. To answer anything other than that ignores all of the facts surrounding this
14 project. Maine does NOT need this and neither does Massachusetts. They have
15 plenty of their own natural resources they could exploit, but they chose not to. In
16 addition, Vermont has a ready and waiting, permitted corridor, underground and
17 under water, from Canada to Massachusetts.

18 There is no price that we can put on Maine’s most critical natural resources, which
19 give us our livelihoods and quality of place. How can we say to our guests “This is a
20 wild and scenic stretch of river...but ignore this part here.”? or “This is a national
19 scenic byway...umm, but not over here.” Or - “Let’s ride to top of Coburn Mountain
20 for a view of some amazing mountains and lakes... but don’t look when you get to
21 the top.” I guarantee the guests comments will be “Hey, what’s that about down

1 there?”, or “Too bad they had to put that there!” or “What’s up with that power
2 line?” Nobody can know for certain what the long term negative economic impacts
3 would be, but I can tell you that this would be at least many nails in the coffin to our
4 tourism industry. Our large working forest has been almost worked to death, and if
5 you add giant transmission line to fragment that forest even more, or add a bunch of
6 grid scale wind farms to that, our way of life as a tourist attraction will be buried in
7 the ground. Our brook trout habitat will be lost, our deer yards shrunk away to
8 nothing, and our view shed destroyed.

9 We simply cannot in good conscience sacrifice these things for a few short-term
10 jobs, or money for a bike trail (like we need more trails up here). Every waterbody in
11 this state, belongs to the people of this state, and the view shed in this state, belongs
12 to everyone.

13 Common sense needs to prevail here. We don’t need this! Remember that this is
14 vacationland! The way life should be.

15 CMP has not shown that there is no alternative. I would like to cite laws that are
16 relevant in these proceedings:

17 Site Location of Development Law – 30 M.R.S. § 484. Applicable Licensing Criteria

18 30 M.R.S. § 484(3). No adverse effect on the natural environment.

19 CMP has not “made adequate provision for fitting the development harmoniously
20 into the existing natural environment and that the development will not adversely
21 affect existing uses, scenic character, air quality, water quality or other natural
22 resources in the municipalities along the transmission line or in neighboring

1 municipalities.” CMP’s proposed project will likely have significant negative
2 impacts on existing whitewater rafting, hiking, hunting and fishing activities on
3 rivers remote ponds, lakes and on land, as well as on the scenic character of the Old
4 Canada Scenic Byway and the Appalachian Trail.

5 These significant negative impacts on our natural environment correlate to our
6 residents' way of life, livelihoods and the community's economic viability which is
7 dependent on the lure of tourists to visit the very attributes which will be taken away.
8 30 M.R.S. § 484(3)(A).

9 The Department should consider the effect of noise from the construction and
10 operation of the proposed transmission line. It is impossible for it to not disturb the
11 wildlife and recreational users.

12 30 M.R.S. § 484(3)(H).

13 CMP’s proposed project may adversely impact significant vernal pool habitat.

14 CMP’s application indicates that there are at least 42 significant vernal pools and 23
15 potentially significant vernal pools wholly or partially located within the proposed
16 action area. The herbicides CMP would use to keep the corridor clean would
17 inevitably enter and pollute the vernal pools.

18 30 M.R.S. § 484(5). Ground Water.

19 CMP’s proposed project may “pose an unreasonable risk that a discharge to a
20 significant ground water aquifer will occur.” CMP’s application indicates that
21 “potential sources of groundwater contamination will include fuel and hydraulic and
22 lubrication oils used in the operation and maintenance of vehicles, as well as the
23 application of herbicides to control vegetation.” NECEC Site Location of

1 Development Application at 15-1.

2 Chapter 375: No Adverse Environmental Effect Standards of the Site Location of
3 Development Act.

4 06-096 Ch. 375, § 3. No Unreasonable Alteration of Natural Drainage Ways.

5 CMP's proposed project "will cause an unreasonable alteration of natural drainage
6 ways" through improper drainage right-of way and drainage that may result in
5 adverse impact to adjacent parcels of land. CMP's application indicates that their
6 project will cross 115 streams, 263 wetlands, and impact 76.3 acres of mapped
7 wetlands. This corridor is crossing some very significant terrain with heavy
8 equipment. This terrain includes the areas I guide for fishing and hunting.

9 06-096 Ch. 375, § 6. No Unreasonable Adverse Effect on Surface Water Quality.

10 CMP's proposed project could cause the pollution of surface waters through both
11 point and non-point sources of pollution. CMP's application indicates that their
12 project will cross 115 streams, 263 wetlands, and impact 76.3 acres of mapped
13 wetlands.

14 06-096 Ch. 375, § 9. Buffer Strips.

15 CMP's proposed project will not adequately utilize natural buffer strips to protect
16 water quality, wildlife habitat, and visual impacts from the proposed transmission
17 line. At this time, it does not appear that CMP's proposed buffers are sufficient to
18 avoid these impacts.

19 06-096 Ch. 375, § 10. Control of Noise.

20 CMP's proposed project will not adequately control excessive environmental noise
21 from construction, operation, and maintenance of the proposed transmission line

1 which could degrade the health and welfare of nearby neighbors. This is especially
2 true for noise from the transmission lines themselves.

3 Specifically, during the long construction period, our fishing, hunting, rafting, hiking
3 trips will be invaded by the industrialized noise. Peace and quiet and the sounds of
4 nature are integral parts of the outdoor experience that people expect and are
5 attracted to.

4 06-096 Ch. 375, § 12. Preservation of Unusual Natural Areas.

5 CMP's proposed project will harm numerous land and water areas that contain
6 natural features of unusual geological, botanical, zoological, ecological,
7 hydrological, other scientific, educational, scenic, or recreational significance.

8 CMP's proposed project will impact at least 8 deer wintering areas (44.3 acres) and
9 12 inland waterfowl and wading bird habitats (22.7 acres). The project will cross and
10 degrade the scenically and recreationally significant Kennebec Gorge.

11 As for the proposed mitigation to IF&W for the deer, in my experience as a guide,
12 deer need large swaths of wood to survive the winter. Wintering areas cannot be
13 limited to a few small strips of wood along a powerline. In addition, these powerline
14 areas would be polluted with strong herbicides that these deer would be ingesting.

15 06-096 Ch. 375, § 14. No Unreasonable Effect on Scenic Character

16 And NRPA 38 M.R.S. § 480-D (1). Existing uses.

17 CMP's proposed project will definitely and unreasonably interfere with existing
18 scenic, aesthetic, and recreational uses as indicated above.

19 CMP's proposed project will have an unreasonable effect on the scenic character
20 along the proposed transmission line. For example, the line will cross the

1 Appalachian Trail, the Old Canada Scenic Byway, the Kennebec Gorge, and many
2 other important scenic sites - most importantly Coburn and Johnson mountains and
3 the critical snowmobiling and hunting areas. I have attached a visual rendering of
4 the Coburn and Johnson Mountain area via Google Earth with the snowmobile trail
5 system drawn (*See Exhibit 1*). As the successive pictures reveal, a large portion of the
6 snowmobile trail system between Jackman and The Forks will be directly and severely
7 impacted by this transmission corridor should permits be granted. The Coburn and
8 Johnson mountain trail system is at the very heart of our small town economy. A permit
9 in area would be the worst thing possible for our snowmobile tourism. It's the "mecca"
10 of snowmobiling in Maine.

11 Outdoor recreation hub - I have been grooming The Forks Area snowmobile trails
12 since 1998. I've groomed, guided and ridden and hunted in and around the area of
13 Johnson and Coburn Mountains for 20 years. I know the area and lay of the land
14 intimately. I understand the location of the power line and also understand the
15 importance of protecting the area of Coburn and Johnson mountains. That area in
16 particular is a hub for outdoor recreation for all of our tourism activities. From
17 snowmobiles to ATVs to hikers to animal watchers to sightseers, it is central to our
18 whole area and our livelihoods.

19 4 trails collide with the corridor - There are four different trail systems that merge in
20 the same location - at the Coburn Mountain parking lot. ITS 89 West comes from
21 Eustis; the Coburn Connector comes off of ITS 87 from The Forks/Bingham; ITS 89
22 North comes from Jackman; and the north shoulder bypass from Lake Parlin also
23 connects to ITS 87 bringing guests from Rockwood in the East. Anyone traveling

1 through this destination area will be inundated with powerline in every direction. It
2 will be impossible for this corridor/line not to be in-your-face and obtrusive to your
3 experience.

4 Impacting every trip - If you ask any snowmobiler that's ever been up here, if
5 they've been to Coburn Mountain, over 90% would say "yes". It is the first choice in
6 destination. A typical ride from The Forks would be ITS 86 along the Dead River to
7 ITS 89 to Grand Falls, then from Grand Falls back on ITS 89 to Coburn Mountain
8 over the north shoulder and to Parlin Pond. Then from Parlin Pond back to ITS 87
9 and down to The Forks. The Entire time, Johnson and Coburn Mountain are central
10 to that trip. Scenic views of these mountains from far to near are key guiding stops
11 along the way. If the powerline would be put into place, literally the poles and lines
12 will be observable from every scenic viewpoint.

13 Scenic destination area. Usage and Impact.

14 In the last ten years, traffic in that area has exploded. It is one of the most popular
15 destinations anywhere in the state. NECEC would be similar to running a powerline
16 up and around Cadillac Mountain in Acadia. The value and character and area has
17 been overlooked by the designers of this project and has purposely been ignored. No
18 studies have been done to know the amount of traffic that goes through these routes
19 during the winter. The Department and Commission should not even consider this
20 until studies are done to determine facts related to usage and economic impact of this
21 area.

22 Personal Financial Harm. No studies have been done to understand the economic
23 impact that Coburn Mountain and the snowmobile trails have in our communities.

1 To shut down Coburn during construction, would force many of the local residents,
2 like myself, to find work in another part of the state.

3 The very presence of this powerline invading our snowmobile trail system is enough
4 to ward off the visitors and regulars that I guide and know. It will change the
5 landscape to the point of no return. This area will forever be raped of its uniqueness
6 and allure and all that makes it a treasure.

7 Powerline trails. In terms of the quality of snowmobile trails under transmission
8 lines, I have had years of experience maintaining trails and grooming trails. They
9 don't hold the snow. They are hard on equipment because they are an unimproved
10 surface. They are windswept and sun exposed. They are the first trails to be melted,
11 and consequently closed. Nobody enjoys riding under a powerline but simply uses
12 them as a means of egress. No surveys have been done, aside from Sandra
13 Howard's, to see if snowmobilers enjoy riding on powerlines. But in my experience,
14 powerlines are simply used as a means of egress and are not the preferred trails to
15 ride or maintain.

16 Lights. Designers failed to take into consideration that any towers that are high
17 enough to require blinking red lights to aerial visibility are creating light pollution to
18 the very people who come up to our area to get away from it. These lights would be
19 a desecration of the view shed and outdoor experience.

20 06-096 Ch. 375, § 15. Protection of Wildlife and Fisheries.

21 CMP's proposed project does not adequately protect wildlife and fisheries. CMP's
22 proposed project does not contain buffer strips of sufficient area to provide wildlife
23 with travel corridors between areas of available habitat, will adversely affect wildlife

1 and fisheries lifecycles, and will result in unreasonable disturbance of deer wintering
2 areas, significant vernal pools, waterfowl and wading bird habitat, and species
3 declared threatened or endangered.

4 Natural Resources Protection Act – 38 M.R.S. § 480-D. Applicable Licensing
5 Criteria. 8 M.R.S. § 480-D (3). Harm to habitats; fisheries.

6 CMP's proposed project may unreasonably harm significant wildlife habitat,
7 freshwater wetland plant habitat, threatened or endangered plant habitat, aquatic or
8 adjacent upland habitat, travel corridor, and aquatic life. CMP's proposed mitigation
9 may diminish the overall value of significant wildlife habitat and species utilization
10 of the habitat in the vicinity of the proposed transmission line.

11 38 M.R.S. § 480-D (8). Outstanding river segments.

12 CMP has not demonstrated that no reasonable alternative to crossing outstanding
13 river segments, such as the Kennebec Gorge, exists which would have less adverse
14 effect upon the natural and recreational features of the river segment. Although CMP
15 doesn't consider this section of the crossing as "particularly unique or wild", citing
16 "... the Preferred Alternative location, which as described above is not particularly
17 unique or wild, would not adversely affect existing uses of the Kennebec River."

18 This section is where I stop with my fishing guests for lunch. It is just above Cold
19 Stream, a major tributary and significant spawning waterway. It is hard to believe
20 that this much disruption and heat will not interfere with the fisheries' viability.

21 Chapter 310: WETLANDS AND WATER BODIES PROTECTION

22 06-096 Ch. 310, § 5. General Standards.

23 CMP has not adequately minimized the amount of wetland to be altered. I believe
24 that CMP's proposal may result in an unreasonable impact because the project will

1 cause a loss in wetland area, functions, and values, and CMP has not demonstrated
2 that there is not a practicable alternative to the proposed project that would be less
3 damaging to the environment.

4 Chapter 315: Assessing and Mitigating Impacts to Existing Scenic and Aesthetic
5 Uses 06-096 Ch. 315.

6 CMP's proposed project is likely to unreasonably interfere with existing scenic and
7 aesthetic uses, and thereby diminish the public enjoyment and appreciation of the
8 qualities of a scenic resource, and that any potential impacts have not been
9 adequately minimized.

10 Chapter 335: Significant Wildlife Habitat
11 06-096 Ch. 335, § 3(A). Avoidance.

12 CMP's proposed project will have an unreasonable impact because it is will degrade
13 significant wildlife habitat, disturb wildlife, and affect the continued use of
14 significant wildlife habitat by wildlife. CMP has not demonstrated that there is not a
15 practicable alternative to the project that would be less damaging to the environment.

16 CMP has indicated that the placement of the corridor is based on land CMP owns.
17 This is not avoidance.

18 06-096 Ch. 335, § 3(B). Minimal alteration.

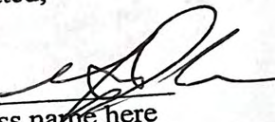
19 CMP has not minimized the alteration of habitat and disturbance of wildlife.

20 06-096 Ch. 335, § 3(C). No Unreasonable impact.

21 One or more of the standards of the NRPA at 38 M.R.S. § 480-D will not be met and
22 that therefore CMP's project will have an unreasonable impact on protected natural
23 resources and wildlife.

Respectfully submitted,

Date: 2/21/2019

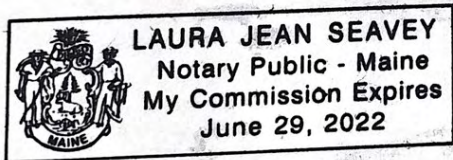
Greg Caruso 
(type or print witness name here
& sign on above line)

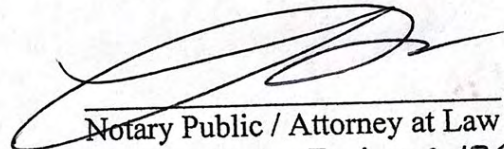
State of Maine
County of Somerset

Date: 2/21/2019

Personally appeared before me the above-named Greg Caruso, who,
being duly sworn, did testify that the foregoing testimony was true and correct to the best of
his/her knowledge and belief.


Before me,





Notary Public / Attorney at Law
My Commission Expires: 6/29/22


2019
The Forks Area
SNOWMOBILE MAP
Ride ITS 86, 87 & 89

Bingham • Caratunk • The Forks • West Forks
TWP Parlin • Jackman • Eustis • Rangeley
Rockwood • Greenville • Kokadjo • Abbot

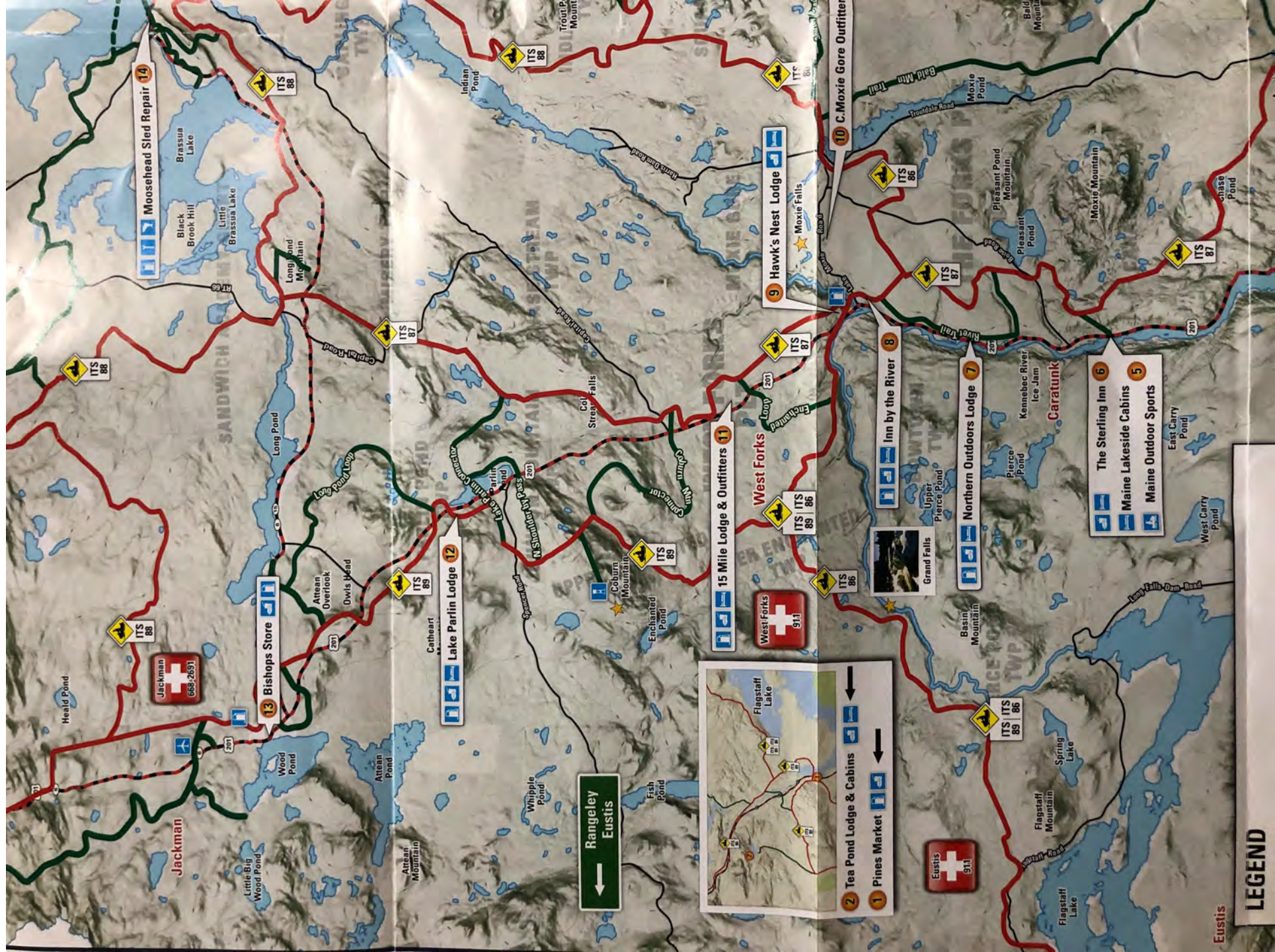
like us 



Coburn Mt. Maine's Highest Groomed
Snowmobile Trail at 3750ft



The Forks Area Chamber of Commerce
Route 201, PO Box 1 | West Forks, Maine 04985
visitforksarea.com



14 Moosehead Sled Repair

ITS 88

13 Bishops Store

12 Lake Parlin Lodge

ITS 89

15 Mile Lodge & Outfitters

ITS 88, ITS 89

9 Hawk's Nest Lodge

ITS 86, ITS 87

8 Inn by the River

7 Northern Outdoors Lodge

6 The Sterling Inn

5 Maine Lakeside Cabins

5 Maine Outdoor Sports

2 Tea Pond Lodge & Cabins

1 Pines Market

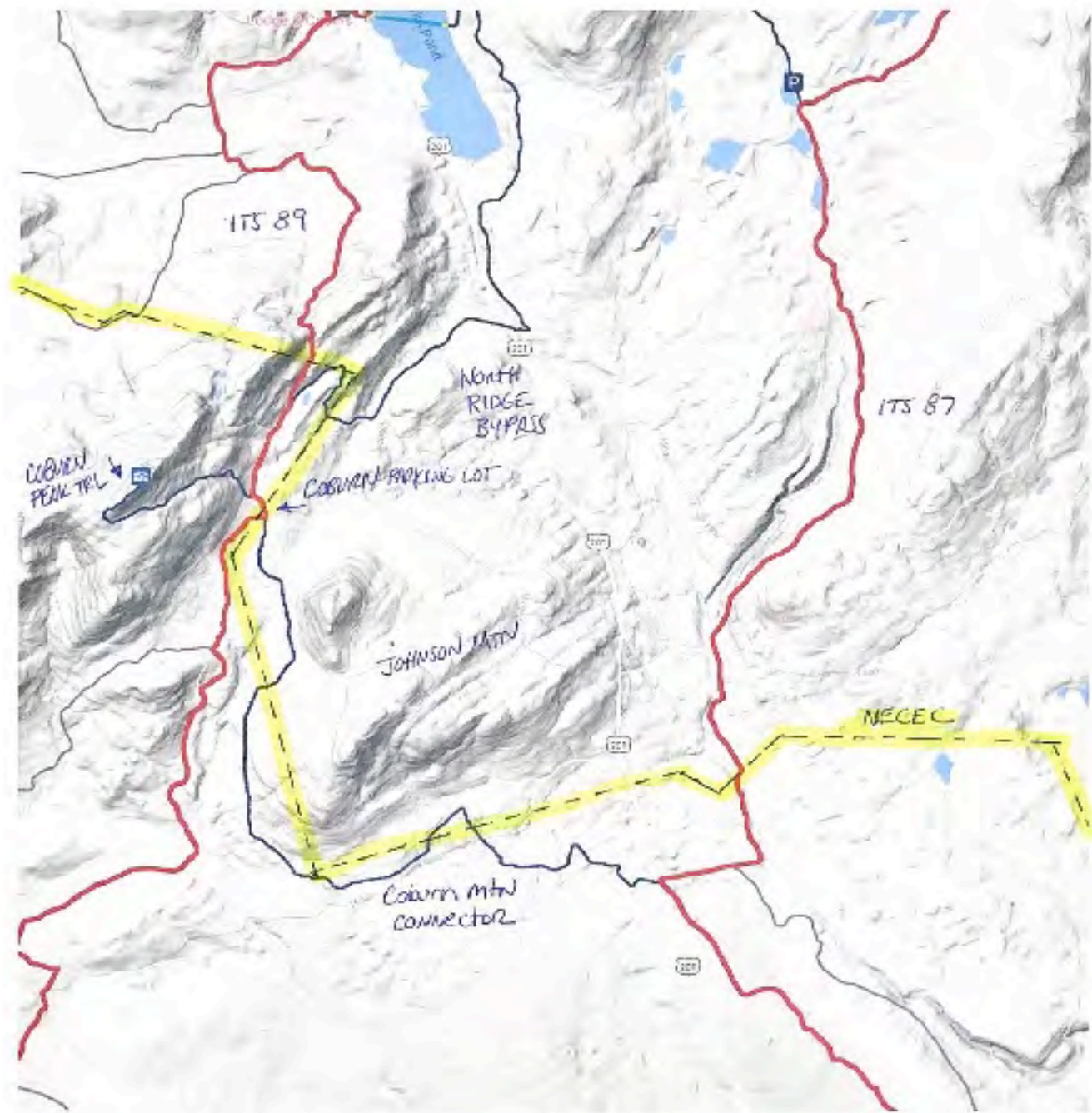
Rangeley Eustis

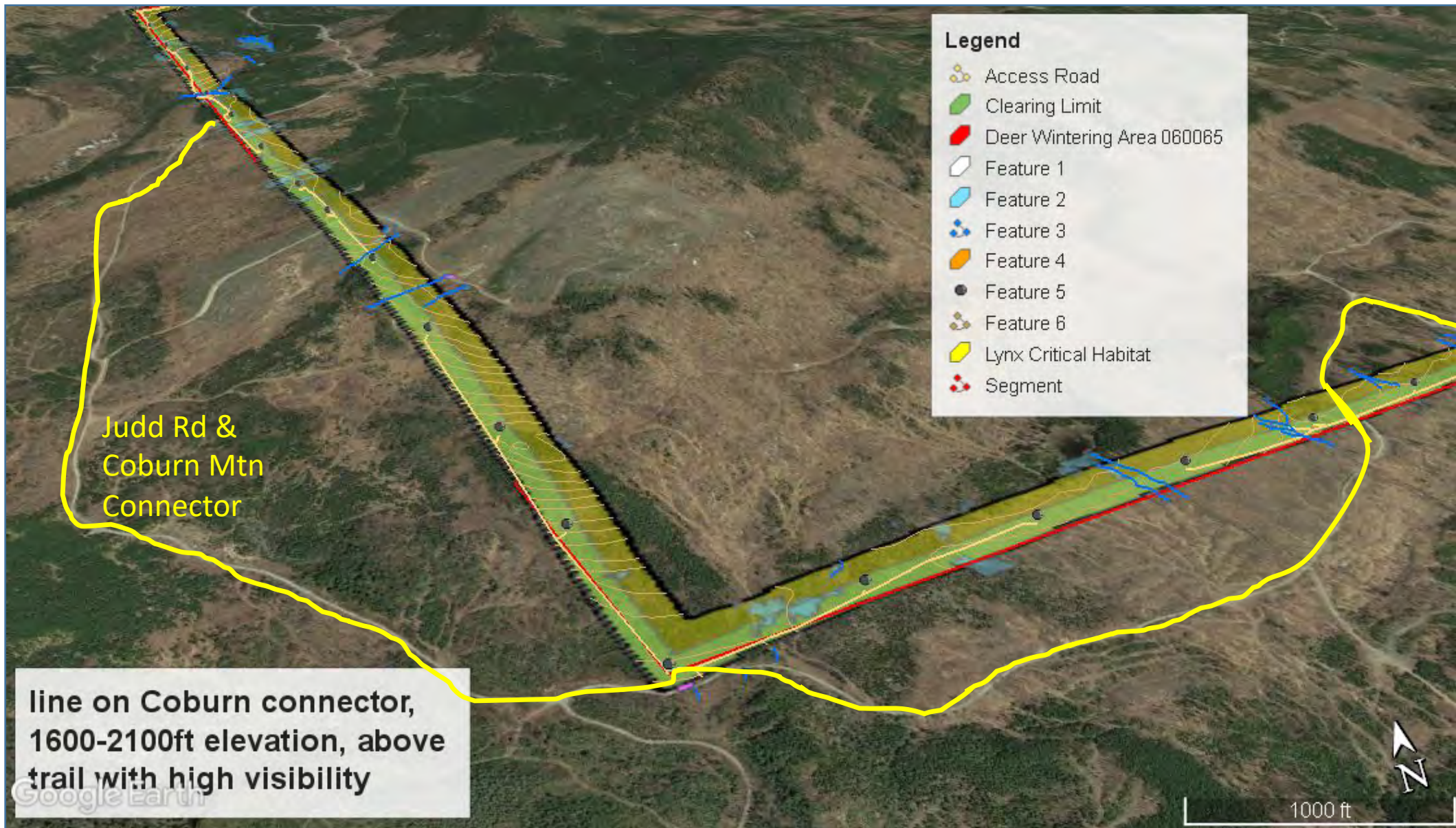
Eustis 911

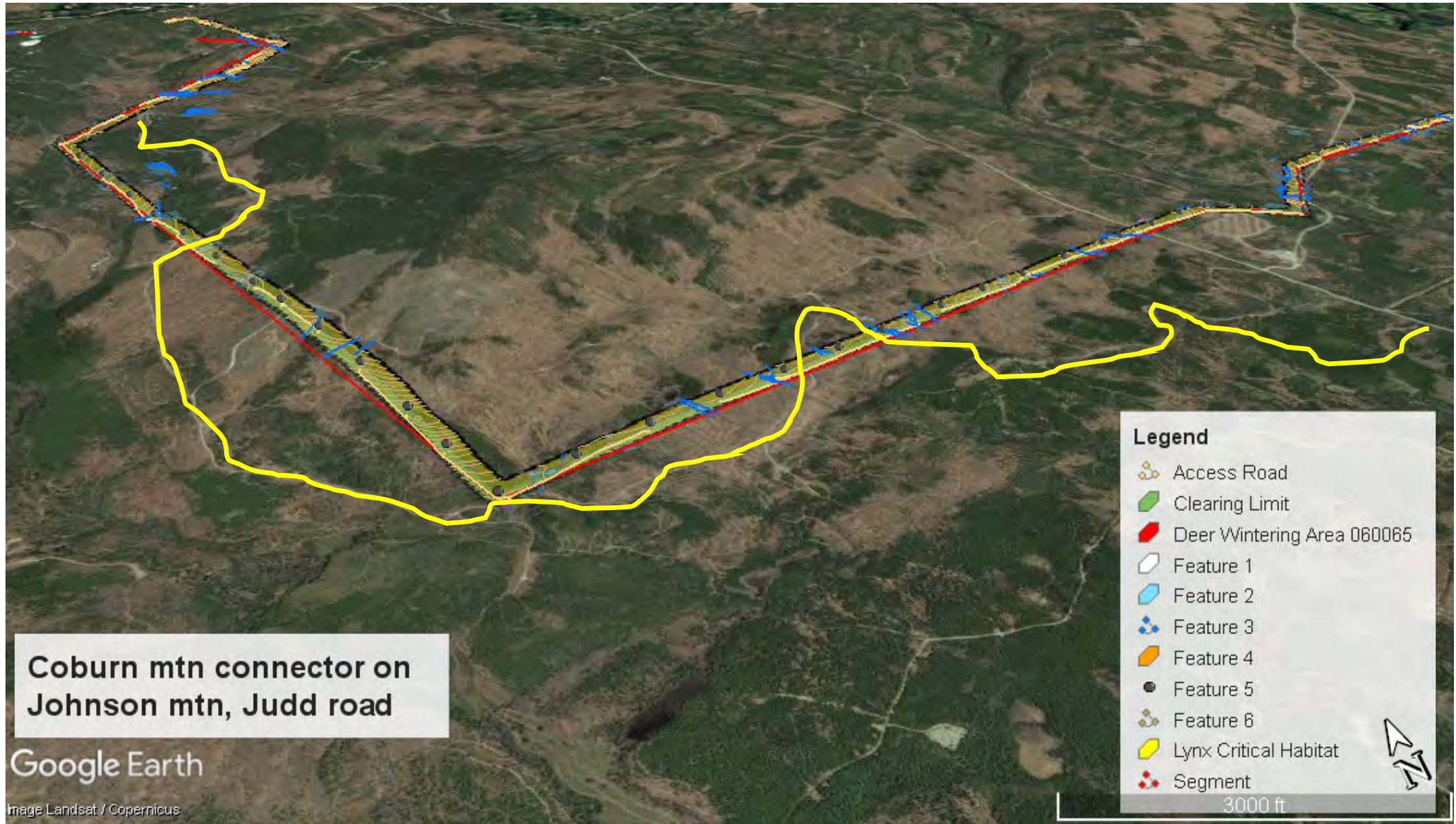
LEGEND

Eustis









Legend

- Access Road
- Clearing Limit
- Deer Wintering Area 060065
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Feature 5
- Feature 6
- Lynx Critical Habitat
- Segment

3000 ft

**Coburn mtn connector on
Johnson mtn, Judd road**

Google Earth

Image Landsat / Copernicus

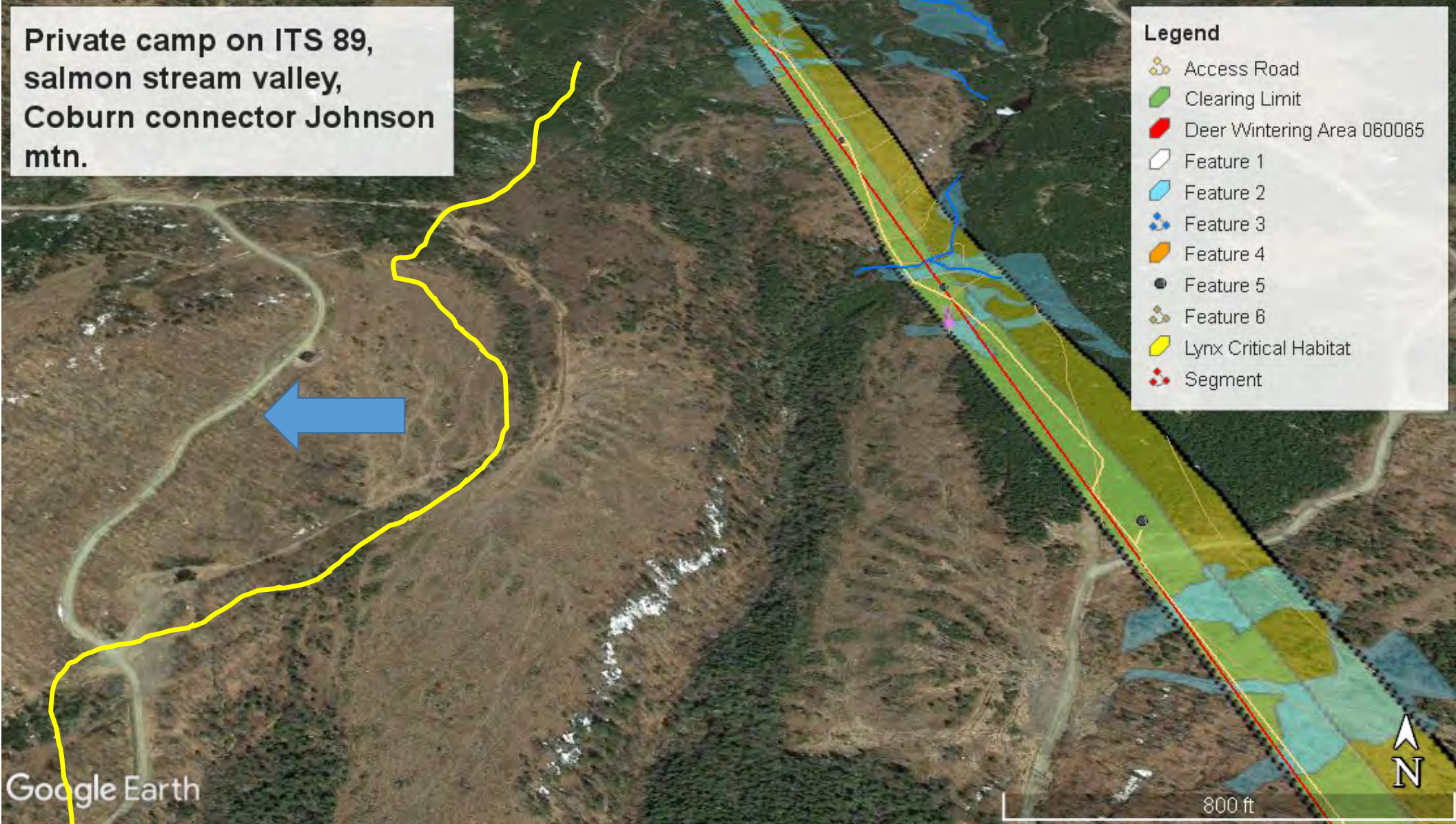
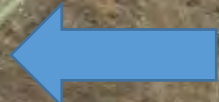
Private camp on ITS 89,
salmon stream valley,
Coburn connector Johnson
mtn.

Legend

- Access Road
- Clearing Limit
- Deer Wintering Area 060065
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Feature 5
- Feature 6
- Lynx Critical Habitat
- Segment

Google Earth

800 ft



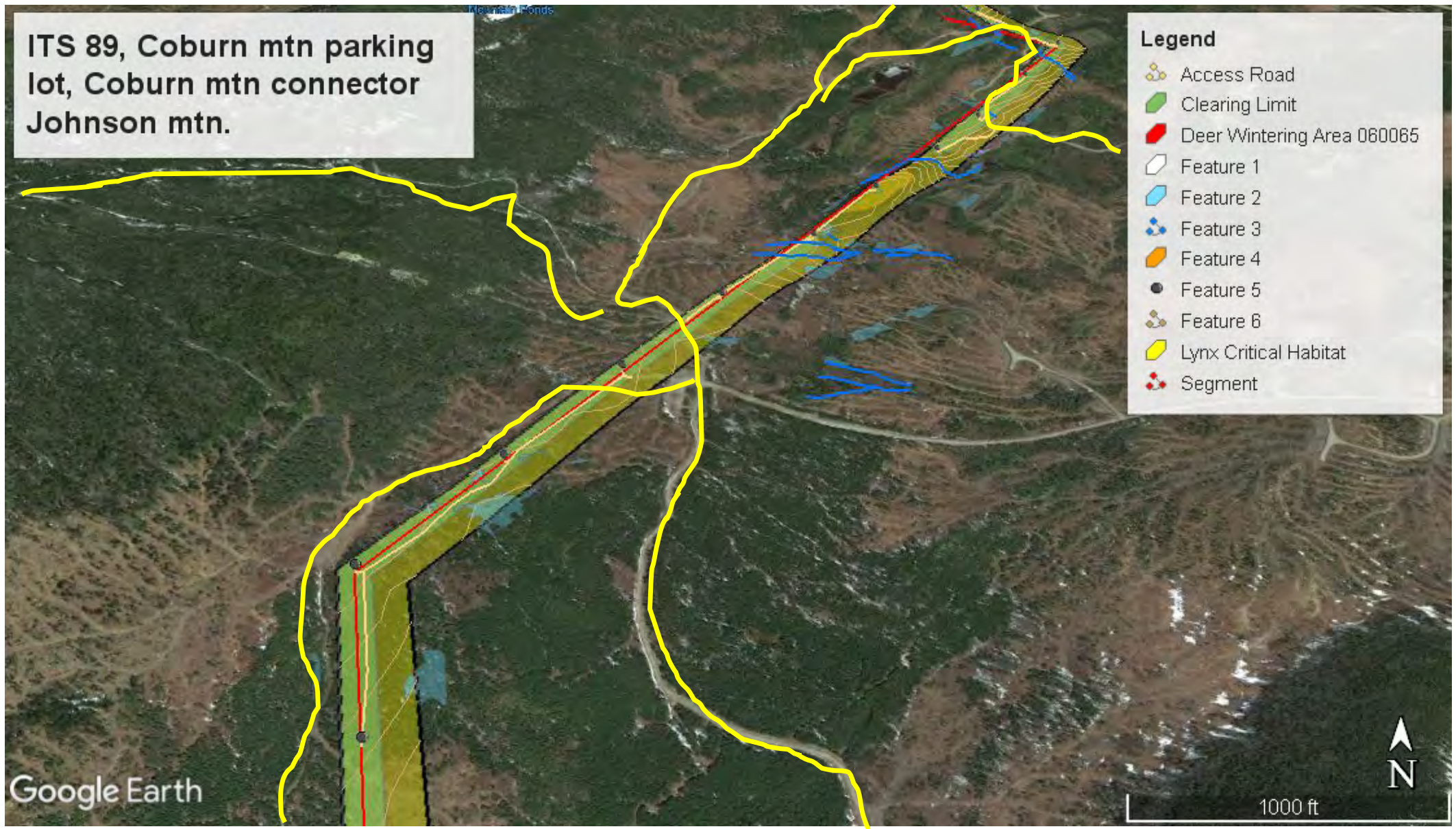

ITS 89, Coburn mtn parking lot, Coburn mtn connector Johnson mtn.

Legend

- Access Road
- Clearing Limit
- Deer Wintering Area 060065
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Feature 5
- Feature 6
- Lynx Critical Habitat
- Segment

Google Earth

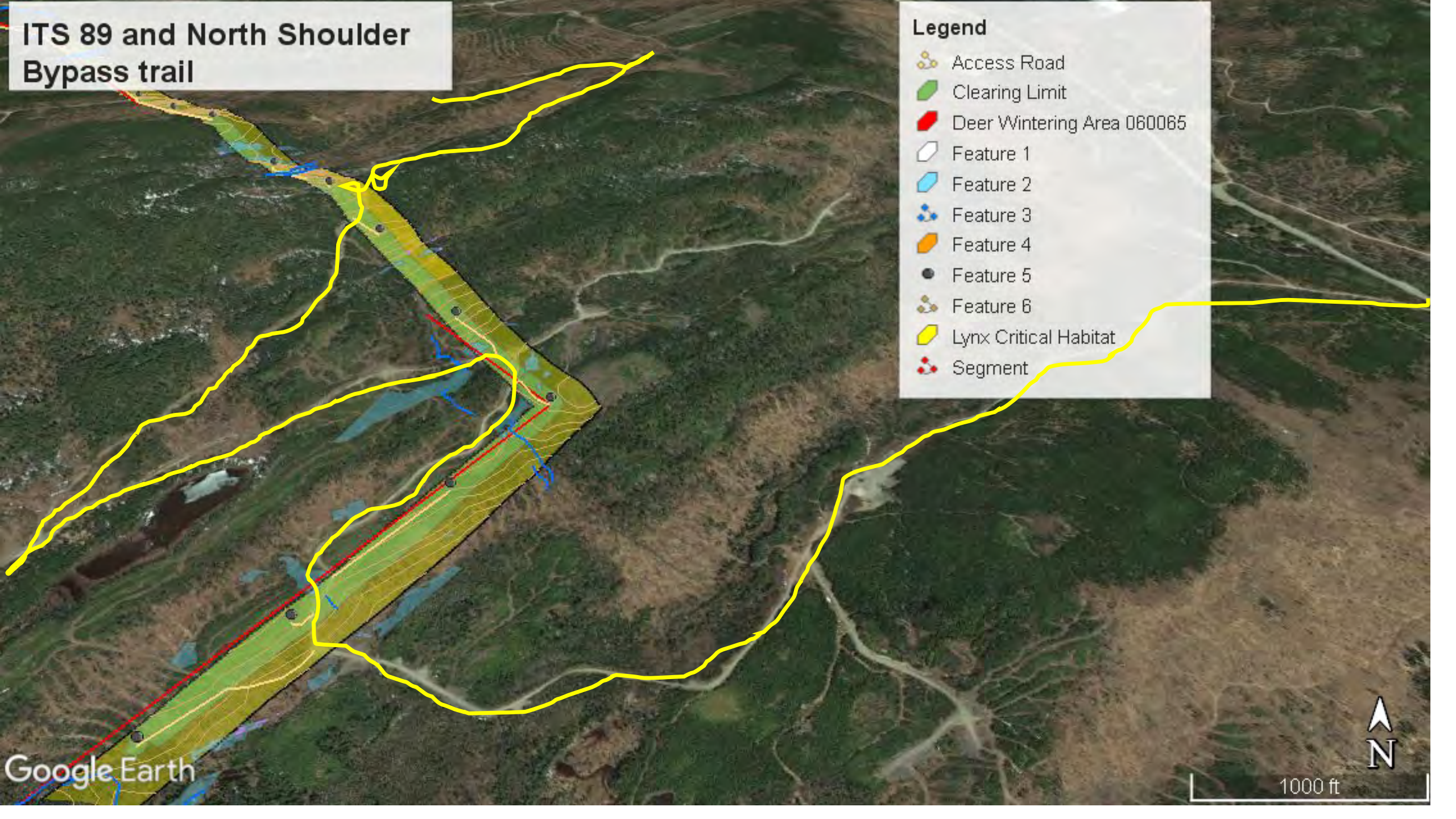
1000 ft



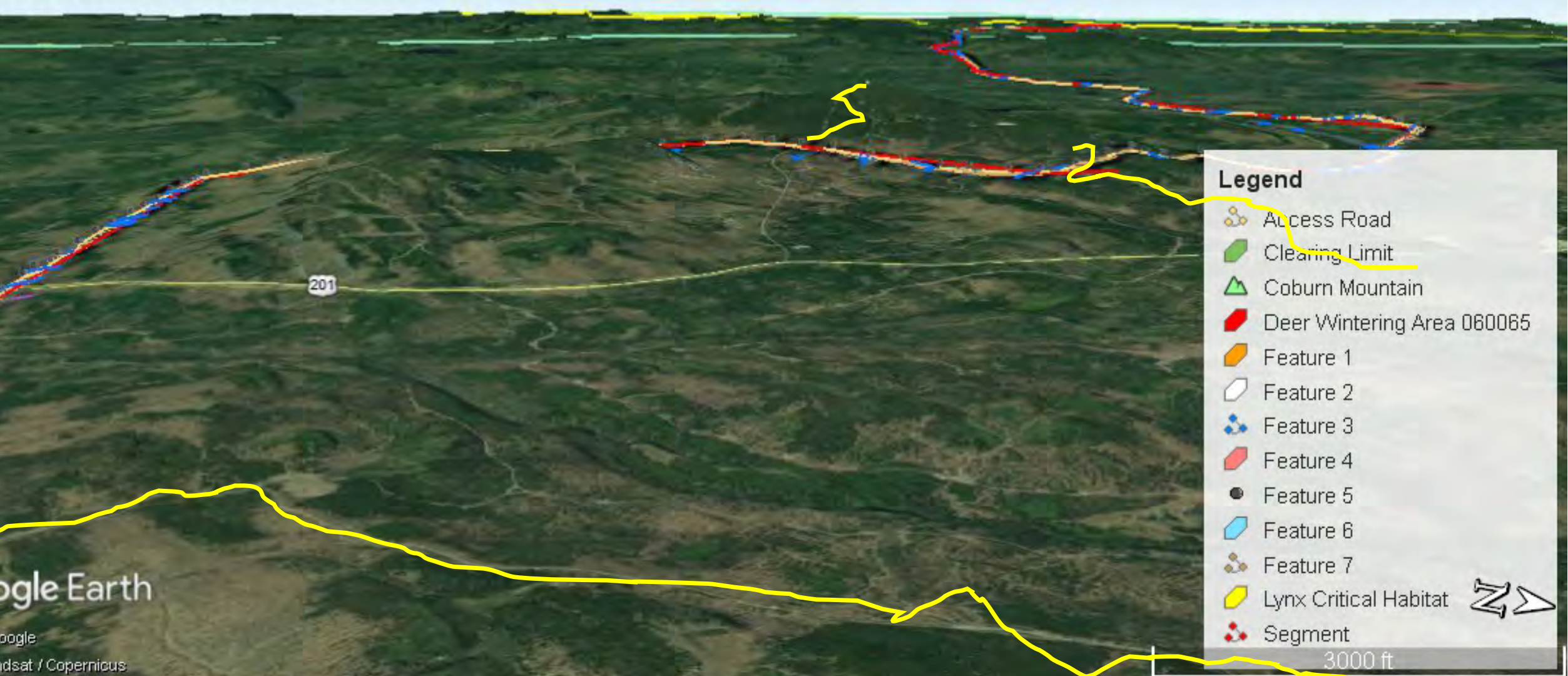
ITS 89 and North Shoulder Bypass trail

Legend

- Access Road
- Clearing Limit
- Deer Wintering Area 060065
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Feature 5
- Feature 6
- Lynx Critical Habitat
- Segment



S 87 from Cold Stream mountain
road looking toward Johnson and
Coburn mtn(ITS 89 and Coburn
connector and bypass trail



S 89 line crossing North Shoulder Coburn Mtn 2700ft

Legend

- Access Road
- Clearing Limit
- Deer Wintering Area 060065
- Feature 1
- Feature 2
- Feature 3
- Feature 4
- Feature 5
- Feature 6
- Lynx Critical Habitat
- Segment



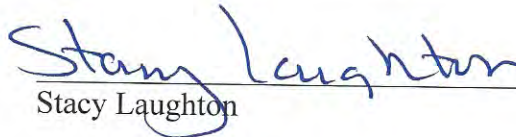
3. My responsibilities in this matter include coordinating, collating, and preparing pdf versions of all of the prefile testimony and exhibits for the 15 Intervenor and Expert witnesses on behalf of Intervenor Groups 2 & 10.

4. My responsibilities also include submitting all of the pdf prefile testimony and exhibits.

5. In exercising my duties with these tasks, I made an error with Mr Caruso's testimony. Rather than save the pdf I prepared of his prefile testimony with his signature page and exhibits in the sub-folder I used from which to upload/file and distribute to the list serve, I erroneously saved the pdf of just his prefile testimony. We had his signature page showing he did sign and swear to his prefile testimony in our file.

6. Due to my filing error, instead of uploading/filing Mr. Caruso's prefile testimony with signature page and exhibits, I submitted the incomplete pdf of Mr. Caruso's testimony.

Dated at Portland, ME this 15th day of March, 2019.




Stacy Laughton

STATE: MAINE
County: CUMBERLAND

Date: 15 MAR 2019

Personally appeared before me the above-named Stacy Laughton in her capacity as paralegal with BCM Environmental & Land Law, PLLC, and made oath that the foregoing affidavit signed by her is true and accurate and based upon her own personal knowledge as therein described.

Before me,



Name: STEV PARKER RD # 7029
~~Notary Public~~ / Attorney at Law