



MAINE POWER RELIABILITY PROGRAM

A CENTRAL MAINE POWER COMPANY PROGRAM

WWW.MAINEPOWER.COM

October 1, 2009

Wayne Basford, Chair
Town of Detroit Planning Board
35 South Main Street
Detroit, Maine 04929

RE: Central Maine Power Company (CMP) Maine Power Reliability Program (MPRP)
Response to Request for Additional Information Dated August 26, 2009

Dear Mr. Basford:

Thank you for your letter dated August 26, 2009 requesting additional information from Central Maine Power in regards to the MPRP project application presented at your Planning Board meeting on August 18, 2009. We provide the following information in response to that letter. I have organized this letter by topic and incorporated references to corresponding attachments. We would be happy to address any questions you may have about the information provided.

1. *A letter from the State of Maine Flood Plain Office stating that the engineering study is acceptable.*

The Floodway Impact Study for the Town of Detroit and the engineering Statement in reference to Article VI of the Town's Floodplain Management Ordinance were forwarded to Sue Baker, State Floodplain Coordinator, who in turn had the documents reviewed by a FEMA engineer. Included with this letter is an email response from Ms. Baker received by us on September 28th (Attachment A) indicating that the materials had been reviewed and were found acceptable.

2. *A letter from the Maine Department of Environmental Protection stating that all state federal permits have been granted and also copies of those permits.*

CMP does not expect the DEP to issue the NRPA and Site Law permits until at least the end of the year. As was explained at the August 18th meeting, the size and scope of the MPRP project has necessitated undergoing the federal, state, and local permitting processes concurrently. We are therefore requesting that the Board consider a condition of approval requiring CMP to submit copies of the DEP permits to the Town prior to the beginning of any construction. We would likewise provide copies of the Army Corps Section

404 Clean Water Act permit, along with the Certificate of Public Convenience and Necessity once issued by the Maine Public Utilities Commission.

3. *A letter from the Maine Historic Preservation Commission that addresses where, if any, these sites are located in the Town of Detroit. Also the letter should address what the Town of Detroit should require of your company if such sites exist in Detroit.*

We submitted the Town's request to the MHPC, and asked MHPC to provide town-specific findings to supplement the segment-specific letters previously submitted to the Town. The MHPC has since indicated its unwillingness to provide town-specific findings (included as Attachment B). However, TRC re-reviewed each of the survey reports for the portion of the project in Detroit and determined that none of the historic archeological, prehistoric archeological or historic architectural resources identified in Segment 3 of the MPRP project area are located within the Town. With respect to direction from MHPC as to what the Town should require, given the absence of any such resources, nothing further should be required on this point.

4. *Necessity of cutting shrubs down to ground level in Shoreland Zones.*

The objective of managing vegetation on a transmission line corridor is to maintain the ecological values of natural resources without sacrificing the operational safety and reliability of the electric conductors. For safety and reliability reasons, all species capable of growing into the conductor safety zone (known as "capable species") must be removed from the corridor. Most capable species are trees, although some shrubs are also capable of growing into the safety zone, as well.

Despite the need to remove capable species, all MPRP transmission line corridors will be continuously vegetated with non-capable herbaceous plants and shrubs, just as they are currently. This will ensure that the potential for soil erosion and sedimentation to wetlands and other water bodies is minimized, water temperature increase due to insolation is limited, and other significant habitat values are protected. These conditions will persist after construction is complete. We should also note that CMP does not maintain capable species at specific above-ground height levels due to additional safety risks to workers and the additional expense attributed to planning more frequent entries.

5. *Clearing for construction be done at the time of year to avoid bird nesting time.*

CMP maintains a policy of scheduling construction to avoid areas where there are ospreys and eagles nesting on transmission line structures. This is generally the period from late April until mid to late June.

6. *Third Party inspections*

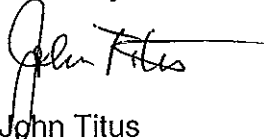
Note that CMP will be required by DEP to undergo third party inspections throughout the construction period. In addition, the Town's Code Enforcement Officer will have an

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opportunity to review the Access Plan to be put together prior to construction. This Plan will include the implementation of erosion control measures.

Feel free to contact me should you have any questions regarding this letter or the attached information. We would otherwise be willing to meet with the Board again should it become necessary.

Sincerely,



John Titus
Environmental Specialist
TRC Engineers, LLC

Enclosure

cc: Steve Seekins, Code Enforcement Officer
File # 166247-0005 Maine Power Reliability Program