



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Sunhaze Meadows National Wildlife Refuge  
1168 Main Street  
Old Town, ME 04468

February 12, 2004

Fred Leigh – NRI Project Manager  
Bangor Hydro-Electric Company  
P.O. Box 932  
Bangor, ME 04402-9987

Dear Mr. Leigh:

This letter is being written in response to the phone conversation we had on January 26, 2004, in which you formally notified me that the MEPCO South Alternative to upgrade electrical line capacity in Maine could impact the lands of Sunhaze Meadows National Wildlife Refuge. As I understand the MEPCO South Alternative, this proposal would require the taking of 100 feet of refuge land on the east side of the current power lines, thus expanding the current 250 foot easement to 350 feet. The total amount of refuge land needed to expand the current power line to 350 feet is 100 feet multiplied by approximately 4 miles (21,120 feet). The total of the directly impacted area equals 2,112,000 square feet, which equals approximately 48.5 acres.

As the refuge manager, I am very concerned about any proposal which may potentially impact lands of the National Wildlife Refuge System. These lands are being managed in perpetuity for the American people, and are lands where the U.S. Congress has directed the U.S. Fish and Wildlife Service to place the needs of wildlife first. The supporters of the National Wildlife Refuge System feel very strongly that refuge lands and habitats should be protected.

I have a number of specific concerns regarding the MEPCO South Alternative, which are listed below.

## Refuge Concerns

1. The power line expansion would impact wetlands in the upper reaches of Little Buzzy Brook, a tributary of Sunhaze Stream. Wooded and boggy wetlands provide habitat for four-toed salamanders, a Maine Species of Special Concern. Two breeding four-toed salamanders were discovered in a wetland within the current 250 foot easement area, on refuge land in June, 2003 by University of Maine graduate student Rebecca Chalmers. According to Ms. Chalmers, expansion of the current easement by an additional 100 feet would have the following effects on four-toed salamanders who may be utilizing the present easement area:

- a) a greater dispersal distance to adjacent forest habitat;
  - b) poisoning from the use of herbicides to control woody vegetation;
  - c) destruction of wetland hydrology in the area directly or indirectly through construction activities.
  - d) killing of individual salamanders with machinery during the May-July breeding and brood-rearing period. Because it is not known when young salamanders disperse into nearby forested areas, machinery could threaten them in August and September as well.
2. The power line expansion would directly or indirectly impact several acres of wetlands located just north and just south of Sunkhaze Stream. Although the total acreage of these impacts is relatively small, an expansion of the power line corridor will bring inappropriate development ever closer to the Sunkhaze Meadows Bog, which the refuge was established to protect. This is a valid concern, as the power line corridor provides a conduit for increased human uses, especially the illegal use of all-terrain vehicles, on refuge lands.
  3. A great blue heron rookery, discovered in 1999, is located within 50 feet of the current 250 foot easement, where an old road proceeds southeast through a grove of large white pines. This active rookery would be destroyed by the expansion of the power line. Great blue herons are a designated National Priority Trust Species.
  4. National Wildlife Refuge lands potentially contain historic and archeological resources, which are protected by law. No historic or archeological surveys have been conducted within the lands which would be impacted by an expansion of the current 250 foot easement. Such surveys would need to be completed prior to any new ground disturbance activities.
  5. An increase in the width of the power line easement from 250 feet to 350 feet will require an increased use of chemicals to control unwanted woody vegetation along the power line corridor. The use of these chemicals and the patrol of the power line corridor by low-flying aircraft for maintenance purposes can impact wetland dwellers such as amphibians and birds such as ospreys, which currently nest on power line towers.
  6. Refuge lands immediately east of the present 250 foot easement are frequently used by refuge visitors for hunting, wildlife observation, photography, and environmental education purposes. These four public uses were designated in the National Wildlife Refuge System Improvement Act of 1997 as priority public uses of National Wildlife Refuge lands. An expansion of the easement by 100 feet would require the relocation or reconfiguration of:
    - a) The trailhead of the North Buzzy Brook Trail.
    - b) Several small pulloff areas along McLaughlin Road that are utilized by hunters to park vehicles.
    - c) A refuge gate which is currently blocking access to refuge lands from the east side of the current 250 foot easement to McLaughlin Road.
    - d) A small parking area at the trailhead to the North Buzzy Brook Trail.
    - e) The removal and relocation of approximately 30 refuge boundary signs.
    - f) The relocation of the 4' x 8' refuge entrance sign along the Stud Mill Road east of the current 250 foot easement.

7. A portion of the statewide ITS-84 snowmobile trail enters refuge land along the current 250 foot easement and joins McLaughlin Road until the road ends at Sunkhaze Stream. Expansion of the power line corridor will affect the recreational experience currently enjoyed by snowmobile users.
8. The current 250 foot easement is currently used illegally by all-terrain vehicle riders who enter the easement area from the Stud Mill Road. A multi-year effort is underway to halt this activity by blocking the power line corridor with concrete blocks and eventually, a gate. An expansion of the corridor by an additional 100 feet will make access by illegal all-terrain vehicle riders easier and will make blocking of the easement area more difficult and expensive for refuge personnel to accomplish.
9. Expansion of the current 250 foot easement will require the harvest of trees in the 100 feet adjacent to the current easement and will also require the movement of additional trucks and other equipment along the Stud Mill Road. Because the refuge is subject to the terms of a maintenance agreement for the Stud Mill Road (Penobscot County Registry of Deeds, Book 2898, Page 324), the movement of these additional trucks and other equipment will trigger charges which will need to be paid to International Paper Company for road maintenance.
10. Construction activities needed to expand the current 250 foot easement will likely impact the surface of McLaughlin Road and refuge grasslands and associated wildlife located within the current easement area.

Finally, I wish to comment on the Consolidated Corridors Alternative. This alternative, although it does not directly impact refuge lands, is a concern as well. This alternative, which may involve the re-excavation of the Northeast Gas Pipeline along the County Road, will potentially affect the water quality of Baker Brook, Little Birch Stream, Birch Stream, and Johnson Brook. These four water courses are tributaries of Sunkhaze Stream.

Thank you for considering these preliminary comments as you move toward a decision on which power line corridor alternative to favor. Once the comment process under the National Environmental Policy Act begins, you will be receiving additional input from the U.S. Fish and Wildlife Service regarding the five alternatives being considered.

If you have any questions about these comments, please contact me at (207) 827-6138, extension 17.

Sincerely,

Tom Comish  
Refuge Manager

11 Buckhorn Rd.  
Bridgeton, N.J. 08302  
February 19, 2004

Mr. Fred Leigh, NRI Project Manager  
Bangor Hydro-Electric Company  
P.O. Box 932  
Bangor, ME 04402-9987

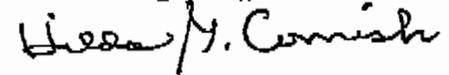
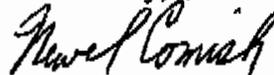
Dear Mr. Leigh:

It has come to my attention that you are considering the expansion of the electric lines across the Sunkhaze Meadows National Wildlife Refuge which my wife and I use for recreational purposes and where we support the efforts of the Refuge to protect wildlife. Your proposal will take nearly 50 acres from the Refuge and damage it during construction. In addition, the chemicals used to control vegetation under the wires will pollute the Refuge and disturb endangered species which make the Refuge their home.

The expansion of your electrical lines will impact recreation as well. Construction and pollution will make canoeing and bird watching less attractive, and will encourage the illegal use of all-terrain vehicles on the Refuge.

For these reasons we urge you to consider alternative routes for your expanded electric lines.

Sincerely,



Dr. and Mrs. Newel Comish

Feb. 10, 2004

Fred Leigh, NRI Project Manager  
Bangor Hydro-Electric Co.  
P.O. Box 932  
Bangor, ME 04401-9987

Dear Mr. Leigh:

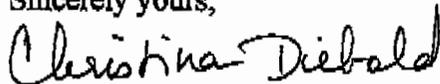
I have learned with alarm that Bangor Hydro's proposed MEPCO South Alternative to increase electric capacity in eastern Maine would take 100 feet of land from the Sunkhaze Meadows National Wildlife Refuge, expanding the current 250-foot easement to 350 feet. The total of refuge land that would be lost as a result would be over 48 acres.

National wildlife refuges are protected as such for a reason -- they are ecologically valuable habitat for wildlife. They have been studied and protected (at taxpayer expense) for a number of years, and they are used by the public for recreation -- hiking, skiing, birdwatching. It would be extremely unfortunate to have a private company diminish such a refuge.

I am also opposed to the proposed route that would follow the natural gas pipeline adjacent to the refuge as that also would have an adverse impact, although not as severe as the first route.

As a member of the Friends of Sunkhaze Meadows, I certainly hope that Bangor-Hydro will find a route that is more acceptable. The refuge is a very special place, home to beaver, deer, bear, moose, otters, muskrats and numerous birds. I have enjoyed nature walks in the refuge, where trails have been developed and maintained over the years by Friends volunteers. A large number of other people in the Alton, Milford, Orono, Old Town, and Bangor area also benefit from the refuge and want it to remain protected.

Sincerely yours,



Christina Diebold  
70 Palm St., #2  
Bangor, ME 04401

**Ronald B. Davis  
64 Gardner Road  
Orono, Maine 04473**

19 February 2004

**Fred Leigh – NRI Project Manager  
Bangor Hydro-Electric Company  
P.O. Box 932  
Bangor, ME 04402-9987**

Dear Mr. Leigh:

As a wetlands researcher (Professor Emeritus of Biology, University of Maine) and Maine citizen familiar with Maine wetlands including Sunkhaze multiple-unit peatland, I am concerned that some of the alternatives being considered for the MEPCO electric line upgrade will negatively impact the Sunkhaze Meadows National Wildlife Refuge. This Refuge was established largely to protect the Sunkhaze multiple-unit peatland and associated mineral-soil wetlands because of their outstanding biodiversity and wildlife values.

The South Alternative is particularly problematic because of its probable impacts on the upper wetlands of Buzzy Brook and resident four-toed salamanders and nearby heron rookery, disturbance due to herbicide applications, including chemical and physical effects on wildlife, public use including greater access by illegal users, and relocations and displacements that the Alternative would require of the limited Refuge staff.

The Consolidated Corridors Alternative is also of concern because of its possible impacts on water quality of several streams that flow into the Sunkhaze wetland.

Sincerely,



Ronald B. Davis, Ph.D.

C: T. Comish

162 Bullen Road  
Milford ME 04461  
February 23, 2004

NRI Project Manager Fred Leigh  
Bangor Hydro-Electric Company  
PO Box 932  
Bangor ME 04402-9987

Dear Mr. Leigh:

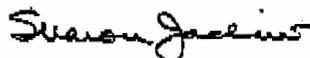
I am writing to you out of concern that the MEPCO South Alternative to upgrade electrical line capacity could have very negative results for the Sunkhaze Meadows National Wildlife Refuge.

Refuge Manager Tom Comish has provided you with specific concerns about both the MEPCO South Alternative, which has many direct and indirect impacts on the Refuge, and the Consolidated Corridors Alternative, which may affect adversely the water quality of four tributaries of the Sunkhaze.

I would like to speak from the perspective of a consumer of Bangor Hydro and of an advocate for the values of the Refuge. As the former, I would gladly pay more to achieve protection of the wild populations of the Refuge. Such lands become more precious every year, as habitat destruction drives ever more species into threatened, endangered, or extinct status, leaving all of us the poorer for it.

I hope that everyone who has a part in making the decisions here will first explore the Refuge in person, particularly the areas most likely to be compromised. A walk by flashlight on a rainy night this spring in the wooded wetlands by Little Buzzy Brook, for example, when the tree frogs and peepers are singing, the spotted salamanders converging in masses to breed in the vernal pools, and the barred owls flying overhead, is an experience to awe all observers and to persuade them of the priceless value of preserving these lands.

Sincerely,

  
Sharon Jackiw

Fred Leigh -- NRI Project Manager  
Bangor Hydro-Electric Company  
PO Box 932  
Bangor, ME 04402-9987

Dear Mr. Leigh,

I am writing about the MEPCO South Alternative to upgrade electrical line capacity in Maine. I am a U. S. citizen and am concerned about that alternative's potential impact on the Sunhaze National Wildlife Refuge.

National Wildlife Refuge Lands are managed in perpetuity for the American people's wildlife, and on these lands the needs of wildlife come first.

I am also a field ornithologist, and have done some neotropical migrant surveys in the Sunhaze. I am also a birding trip leader, and have conducted birding trips there. I am concerned about the neotropical migrant birds (most warblers, most vireos, and tanaagers) which nest within 100 feet of the current power line corridor.

I am also concerned about the increased use of ATVs in the power line easement area, as they appear to course over shallow wetlands wantonly, destroying wetland vegetation and any wildlife species there, e.g. frogs and nesting birds. (I once found a woodcock chick there which had been run over by an ATV.)

I am concerned about the new, active Great Blue Heron rookery.

I am also a field herpetologist who did surveys that resulted in the book, *Maine Reptiles and Amphibians* by Hunter et al. I am concerned about the four-toed salamanders and other salamanders which may be in the headwater areas of Little Buzzy Brook. As a graduate student, I did a salamander habitat study which found that the densities of stream salamanders (collectively, these are spring, dusky, and two-lined salamanders) reach their highest density in stream headwaters.

The Consolidated Corridors Alternative will be a concern as well, due to its possible disruption of streams that flow into the Sunhaze Stream, and destruction of habitats upstream which will affect aquatic and terrestrial species downstream.

Yours truly,  
  
Judy Kellogg Markowsky