Friends of Maine’s Mountains (FMM) is a non-profit 501(c)(3) educational organization that raises awareness about the destructive toll that industrial wind turbines inflict on Maine’s precious and finite natural resources. Since its founding in 2009, FMM’s primary mission is to provide sober and factual information to the general public, the environmental and business communities, the legislative, judicial and executive branches of Maine state government, and the state’s media outlets. As the statewide anti-wind organization, FMM also assists and supports individuals, local opposition groups, and communities as they combat wind energy development. Through advocacy, FMM supports legislative and regulatory changes to protect Maine people from the harmful economic, environmental and health impacts of industrial wind turbines. At the New England level FMM promotes regional energy policies that protect Maine’s ratepayers and environment.

After nearly a decade of frustration with the Wind Act (Expedited Permitting), FMM was pleased to learn that Governor LePage ordered this Commission. The assumptions and presumptions that propelled the Wind Act to a unanimous legislative vote have been discredited and disproved for years, yet the wind industry has taken full advantage of the “red carpet” that was laid out by the Act. Despite dozens of citizen-led attempts to amend or repeal the Wind Act, the Wind Lobby has clung to the Act as if it were sacrosanct, and the legislature has dismissed almost every bill.

Over that time, wind developers built approximately 400 turbines with a nameplate capacity of approximately 900 megawatts. Not including the multi-billion dollar transmission fortification (Maine Power Reliability Program and more), this Maine wind buildup has cost ratepayers/taxpayers approximately $2 billion in infrastructure expenses. In return, last year wind energy provided only 3% of the ISO-New England grid’s electricity, often when the grid did not need it. Moreover, those 400 turbines did not replace or even displace conventional generation. FMM has long asserted to all of New England that the billions spent on wind buildup instead of more critical energy infrastructure constitutes a grossly negligent misallocation of resources that has caused skyrocketing energy bills during a period when energy costs have plummeted. Adding insult to injury, over the same period, this misallocation of resources has revived and preserved dirty fossil fuel generation. We were “off of oil” for electricity generation years ago, yet now oil generation is trending upward in New England.
Then there are the “capacity payments.” New England ratepayers unwittingly pay billions of dollars every year to merchant power plants that burn fuel to maintain ready steam because the grid needs power on demand. Wind energy cannot dispatch on demand, so these capacity plants now enjoy an extended life wherein they get paid to burn fuel and produce in some cases only a few days per year. While these capacity plants that were once the workhorses of the grid continue to burn oil and coal, which had been almost forgotten, we don’t only pay for it with higher rates, but we suffer the emissions too.

FMM is proud that the wind industry fell far short of the “statutory goal” of 2000 MW by 2015. While no applications for grid scale wind projects are now pending, there is a horrific amount of wind development on the drawing board and in the planning stages. If this wind buildup ever happens, Maine can kiss its signature Quality of Place goodbye, and as the Brookings Institution said a decade ago, also kiss our economy goodbye. So FMM wholeheartedly welcomes this Commission, as overdue as it is.

It should be noted that the Governor’s Energy Office conducted a comprehensive review of the Wind Act in 2012. The so-called “OEIS Report,” which should be required reading for this Commission, was the result of overwhelming anti-wind backlash in the Legislature. Unfortunately that OEIS Report, thanks to intense lobbying, was relegated to the dusty shelf where studies go to quietly die. Its recommendations went largely ignored in the subsequent legislature, but the insights and research contained therein are prescient and can save this Commission months of work.

FMM has been called NIMBY and climate denying, neither of which is accurate. Every position that FMM has ever published rests on data. A sober weighing of impact versus benefit is the foundation for all development review, whether at a local planning board or state regulatory agency. Any prudent lay person will conclude that grid scale wind energy is clearly high impact and low benefit, but the Wind Act was written to pre-empt any application of such a calculus. Under the Act, fantastic benefits are presumed; catastrophic impacts are statutorily decreed “insignificant.” The Wind Act has rendered a land use whose scope and scale is unprecedented in Maine history to a rubber stamp transaction. If the benefits were real, the impacts might be tolerable. Airports, power lines, cell towers…these are all iterations of critical infrastructure with benefits that exceed their certain impacts. But with wind energy, the numbers do not lie; the wind lobby does.

Accordingly, and despite FMM’s concerted public education efforts, much of the public still views wind energy as benign, positive, necessary and useful. In fact, it is none of the above, and when the public learns the facts, they are less inclined to tolerate those impacts. The second piece of required reading for this Commission is FMM’s [20 Facts About Wind Energy](http://www.friendsofmainesmountains.org/the-secrets-out/), which is posted on FMM’s web site.

Following the Facts, the third piece of required reading is FMM’s [Critical Insights Poll](http://www.friendsofmainesmountains.org/the-secrets-out/) that proved FMM’s thesis: when people learn the facts about wind energy’s low benefit
and high impact, they are less inclined to tolerate it. 

While most of Maine has held a position on wind energy ranging from supportive to pacifistic, Big Wind has enjoyed that indifference and has worked diligently to grab the brass ring: wind applications have overwhelmed the Department of Environmental Protection for the last decade, and in only a few ill-planned applications have opponents been able to delay or stop the projects. But now Maine people have turned the corner; increasingly they know how useless and unnecessary these machines are; they witness the spoiled experience at Old Speck, Bigelow, Katahdin, Cadillac and the entirety of Maine’s 280 mile Appalachian Trail; they lament the generations-long tradition of tranquility and dark skies in places like Mattawamkeag, Stetson, Mars Hill, and the Lincoln Lakes, now gone because of a land use that is grossly out of scope and scale with the greatest outdoor environment east of the Mississippi. This awareness has surely guided the governor’s intent in ordering this Commission. FMM asks that you set aside the fiction in the Wind Act and the Wind Lobby, and you soberly assess how wrong this land use is for the Maine Brand.

The Maine Brand is well defined in the 2006 Brookings Institution report “Charting Maine’s Future.” That report is FMM’s fourth piece of required reading for the Commission. It is rife with dozens of references to Maine’s Signature Quality of Place. Here is just one:

First, the state should continue to invest urgently in protecting and enhancing its top-notch quality of place, for that is its “calling card,” its brand, and its truest source of prosperity.

Accessible wild places and tranquil country farms, human-scaled Main Streets and working waterfronts: These are what differentiate Maine from other places and in many respects drive its economy. Yet these assets are at risk. Development is encroaching on Maine’s coastal and inland lakes, limiting access. Rising land prices are motivating farmers to sell out. And closer in, the state’s longstanding centers—its regional hubs with their traditional downtowns—cannot often enough stem the flow of suburbanization to truly revitalize themselves. These centers like the green landscape cry out for investment. And so Maine should protect these assets and invest in them as sources of economic advantage. Hence the state’s first economic development need:

...a sustained strategy of making sure Maine holds onto the beauty and small-town community that sets it apart.

But for all that these chapters reflect a strong conviction that Maine is a special place possessed of outstanding, truly enviable potential.

Grid scale wind energy flies in the face of everything the Brookings report suggests. This brings FMM to perhaps its most urgent comment. “Tourism” is obviously important, and industrial development in tourism areas dependent upon nature is clearly incompatible. But in a way the Commission’s charge is flawed. Tourism is a nebulous
subject that can be hard to measure. FMM asserts that the issue is broader, deeper, more impactful: Maine’s Quality of Place and Maine’s signature brand are in grave danger, and that is far bigger than just tourism. It is indeed the lifeblood of Maine’s entire economy. Please see the attached illustration for a reminder of how Maine businesses not in the tourism sector depend on us to preserve and enhance the Maine Brand.

Again, any prudent lay person – once well informed -- can set aside the conventional “wisdom” (propaganda) and conclude that grid scale wind’s benefits do not justify its impacts, that it might be ok in Iowa, but it is wrong for Maine. This Commission has the chance to inform the next governor and legislature so that Maine (the state that banned billboards) can finally say “no more” and “we made a mistake” in our carte blanche position on wind.

As a final dish of food for thought, FMM asks the Commission to consider scale. A current news item helps bring into focus just how little good wind can do, and how massive is its impact. The New England Clean Energy Connect (NECEC), a High Voltage Direct Current (HVDC) transmission line is now under review at multiple regulatory agencies in Maine and Massachusetts. The power line has roused vehement opposition from certain environmental groups that would rather see Maine’s mountains (and not just the Western Mountains) plastered with skyscraping wind turbines. Please consider:

Ideally, and for multiple reasons, Massachusetts would host its own generation capacity close to load centers. The level of hostility and NIMBYism in Maine towards Massachusetts has skyrocketed in recent years because of the wind onslaught, and the NECEC has garnered similar hostility. In a perfect world, the Maine PUC would deny the certificate, and Massachusetts would emerge from its epiphany as self-sufficient in fulfilling its own energy mandates, however ill-advised. Another favorable result for Mainers of a denial would be that Massachusetts might be forced to finally reverse its selfish and irrational predisposition against critical gas infrastructure. However, last time we checked, this world remains imperfect, and Massachusetts will probably continue to view Maine as a subordinate annex and wind power plantation. If NECEC is denied by Maine or Massachusetts regulators, FMM fears that Maine is more likely to be overcome by wind turbines under a Maine wind siting process that renders such an outcome essentially a rubber-stamp transaction. If that comes to pass, Massachusetts utilities should be forewarned that Mainers are increasingly opposing industrial wind projects, and long delays can be expected for applicants, ensuring that the Bay State will never realize its clean energy goals.

As potentially harmful as the NECEC’s risks might be, the alternative is less beneficial and more harmful in every respect. Contemplating the NECEC decision as the lesser of two bad scenarios, FMM sees a third, ultimately worst case scenario: Maine hosts NECEC and profligate wind projects. (In fact, FMM could muster support for four such HVDC lines feeding Canadian renewables to southern New England.)
In addition to ballooning capacity costs, the other major cost shift that has increased consumers’ electricity costs has been transmission & delivery. We have recent lessons to consider when weighing NECEC’s potential impacts versus benefits. There was the multi-billion dollar Maine Power Reliability Project, which is now widely acknowledged as built not so much for reliability as it was in fact necessitated by an ill-advised wind buildup, a multi-billion dollar wind generation buildup that that last year contributed only 3% of New England’s load, often when the generation wasn’t needed. Considering the award of the Massachusetts RFP, NECEC (and Northern Pass) was apparently more preferable than wind to Massachusetts regulators because of NECEC’s ostensible ability to deliver scalable HVDC power, and a significant amount of firm capacity, to a state and region that sorely needs both. Good thinking. NECEC’s shoring up the New England grid, which is losing firm capacity at an alarming rate, could be good for reliability. And in as much as ISO-NE peak energy rates might be stabilized and even reduced, then Maine ratepayers might benefit.

FMM has environmental concerns but FMM starts with some perspective on what truly can be lost or gained environmentally with or without NECEC. If climate change is an issue for consideration in this case, as dictated by policymakers in and out of Maine, then New England’s electric power sector is a miniscule factor in climate change. Maine’s power sector is among the nation’s cleanest when measuring CO2 emissions, so even if Maine were to cease electricity generation altogether, not a single polar bear would notice. Massachusetts is also a leader in clean electricity. Accordingly, NECEC’s fate up or down will have no effect on the climate, so any discussion of it is all but irrelevant. NECEC does propose to cut a massive transmission swath through some valuable Maine natural resources. That impact is not insignificant, and FMM trusts the Maine Department of Environmental Protection to apply rigorous scrutiny and conditions upon the applicant.

However, FMM notes that transmission lines are generally five times smaller than wind turbines, they tend to be sited in lower elevation notches, they are stationary, non-illuminated and they emit no infrasound. Comparing the physical impact of wind projects and transmission lines is apple to oranges. Not that Maine has the available mountains to host 1500 skyscrapers, but if Massachusetts chose to replace the 1200 MW NECEC with wind turbines operating at a generous 30% capacity factor, it would require 4000 MW of installed wind projects, or at least 1500 new turbines (plus lots of transmission).

Consider the 1st and 3rd largest wind projects in New England: Bingham and Kibby, both located in Maine. Also consider the first grid scale project in Maine, Mars Hill, whose 28 turbines caused such a shock that Maine’s tenacious wind opposition movement was born. The sprawling Kibby Wind project sailed through the permitting process with minor opposition despite its massive impact on huge Maine wildlands. FMM was the ONLY opponent to the Bingham Wind Project, which planted 500' tall turbines at high elevation/visibility over a 16 mile stretch AND many more miles of power lines. Both of these “clean energy” wind projects harm water and wildlife over
thousands of acres and they violate the scenic experience along pretty much all of Maine’s 280 miles of Appalachian Trail, an impact that dwarfs the NECEC’s. Despite the massive negative impacts of these two wind projects, they don’t move the needle on the grid, especially when the power is actually needed. At 185 MegaWatts nameplate, performing at a generous 30% capacity factor, it would require 20 Bingham projects to (unpredictably) equal the MegaWattHours provided by either NECEC or Northern Pass. It would take 30 Kibby projects or 100 Mars Hill projects (2800 turbines). If members of the Commission have witnessed first hand the massive footprint of these wind projects, you have to realize the sheer absurdity of pursuing more wind in Maine.

Many of the “environmental” advocacy groups that are party to the NECEC proceeding are opposed to NECEC but they inexplicably support Big Wind running roughshod over the Maine Brand.

When presented with the foregoing comparison of NECEC to wind, they fail to answer the fundamental question: What would be left of the greatest outdoor experience east of the Mississippi?

The fact is, wind energy delivered via AC lines is broadly and markedly inferior to hydro power delivered via DC lines. So FMM considers NECEC the lesser of those “two evils,” and quantifies the impacts versus benefits accordingly.

Last, offshore wind is gaining in political viability if not economic viability. Several northeast states have heeded Maine’s resistance to blasting our mountains and they have incentivized and even mandated offshore wind procurement. While this will be bad for all regional ratepayers it will be good for the Maine Brand. As offshore wind becomes more viable, mountain-based Maine wind becomes less so. FMM urges the Commission to look ahead through that lens.

Rand N. Stowell

Chairman of the Board
OUTDOOR TOURISM - Maine

• Maine tourism is hugely dependent on our brand: Maine’s Quality of Place.

• According to the Maine Office of Tourism’s latest figures, 41% of overnight visitors come primarily to see the lakes & mountains/highlands/Downeast.

• More than the visitors who flock to red hot Greater Portland and Maine’s spectacular beaches combined.

• 88% of overnight visitors came to Maine for touring/sightseeing/active outdoor activities. This is 28% higher than people who come for the food scene.

• Tragically, these special areas and the outdoor activities within them are directly threatened by industrial scale wind development for Massachusetts utilities.

• More of our visitors come from Massachusetts (ironically) than from any other state or province.