

Moosehead Region Futures Committee

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MRFC COMMENTS APPENDIX – 23 AUGUST 2006

Four Economic Sectors of the Moosehead Region's Sustainable Economy

LURC Request:

Conduct an independent study of the current Moosehead Region economy that details current and projected status of labor force and employment sectors.

1. Sustainable Forestry

Positives:

- A. Proposal contains positive language about the value of the forests products economy to the state and it acknowledges the importance of retaining large blocks of forestland to secure it.
- B. Most of the land in the proposed rezoning application will remain in active, forest management.
- C. Proposal recognizes the hope and intention of this region to attract value added forest products manufacturing: creates zoning for such a facility.
- D. Subdivisions are planned to coexist with active forest management roads and locations.
- E. Plum Creek proposes "sustainable working forests" on its ownership in the project area, and supports a forestry certification process intended to ensure sustainable harvesting standards.

Needs Work:

- A. Proposal lacks any current/projected job figures for the forestry sector in the region or any industry projections of future employment. How many area residents (not county but area) are being employed in this industry? How many local full time and part time jobs are connected to Plum Creek's harvesting? What is the range of salaries and benefits?
- B. Proposal refers to a forest management plan but does not include one.
- C. Some proposed land use standards are less protective of resources and water quality than current state standards (example: lack of notification to cross minor streams is less protective than current LURC regulations).

D. Proposal includes the creation of 100 new sawmill jobs as a project economic benefit that will happen when a buyer purchases zoned land and builds such a facility. Recent area history of attempts to attract builders and buyers for this type of facility indicate that this option is not feasible at this time.

E. Plum Creek is currently certified under the Sustainable Forestry Initiative, which uses standards set by the timber industry. Stronger environmental protection and greater assurance of truly sustainable forestry would be provided by the stricter standards set by the Forest Stewardship Council (FSC).

LURC Requests:

A. Request that LURC require a 30 year forest management plan (created by an independent third party) designed to secure species and age class diversity for long-term forest productivity, continued area employment and healthy natural communities and diverse wildlife habitat.

B. Request that LURC (as part of the “balance” criteria) require independent third party certification of Plum Creek’s forest lands in the project area (FSC, similar to Seven Islands, Domtar certification).

C. Request that Plum Creek adopt “Focus Species” forest management practices in order to secure the complete complement of wildlife species necessary for the area’s wildlife economy in the project area.

D. Request that LURC require project land use standards that are as protective as current land use management standards required in LURC jurisdiction.

E. Request that LURC ask applicant to revise its economic projections for the project’s proposed economic contributions, removing sawmill jobs and their economic impact at this time.

F. Request that plan easement language and management criteria are consistent with current LURC model easements or easement management created by the Land For Maine’s Future program.

2. Nature-Based Tourism:

Positives:

A. Plum Creek’s economic report recognizes that “...Tourism and recreation jobs in the retail, accommodations, eating and recreation services industries will generate the largest employment effects in the long term” for the Moosehead Region. (Appendix A-C)

B. Proposal says boundaries of protected property may be modified for purposes of protecting important conservation values and/or natural resources.

C. Proposal has numerous references to the importance of nature-based tourism to the local economy and has offered resort properties with suggested amenities to support its continued growth.

D. Proposed location of a Nordic resort adjoining the current downhill ski area offers the area hope of a high quality four season resort adjacent to the communities of Greenville and Rockwood.

E. Proposed protection for remote ponds is an excellent contribution toward this economy.

F. Proposal plans to offer snowmobile and hiking trails also supports the region's tourism economy.

G. Proposal allows traditional public access on protected property in the project area, essential for the fishing and hunting sectors of our economy.

H. The proposal offers suggested language that might be useful to future subdivision owners as they work to harmonize development within the landscape and reduce the effects of development on views and tourism experiences (screening standards, lighting requirements, height restrictions, square footage of new homes, etc).

I. Proposal recognizes the importance of the region's "brand" of outdoor experiences and has discussion of how retention of this Moosehead "brand" of experiences is essential for the region's nature-based economy.

Needs Work:

A. Current documentation of nature-based tourism employment is lacking. The project's effect on current tourism businesses is not discussed (only projected employment from proposed resorts.)

B. Proposal lacks detailed inventory of current nature tourism sites and experiences; the experiences and their locations that create the Moosehead "brand" are not mapped. Careful analysis of the amount and location of development for close-to-town and remote experiences should be considered. Those include: Prong Pond, Wilson Pond, Indian Pond, East Outlet and Burnham Pond. Remote areas include: Big W, the west and north of Brassua Lake, and Lily Bay.

C. Many proposed subdivisions are located on or near shorelines, elevations and sites that currently sustain many of the region's signature outdoor experiences, views, and wildlife habitat.

D. Many of the subdivisions have been located in the region's nature tourism "settings." (Current Maine research indicates that tourism takes place in the "setting" of a gateway community; tourists seek authentic outdoor experiences close to established towns: day trips. Example: the plan affords no locations for primitive tent camping, especially near shorelines.)

E. Some of the conservation acreage calculated by Plum Creek on remote ponds (to balance development as required by LURC) is confusing since ponds already designated as "remote" cannot be developed anyway.

F. Trails (snowmobile and hiking) created by Plum Creek may be moved with only 30 days notice in order to support forestry operations. Trails have no buffers or scenic protections.

G. The Northern Forest Canoe Trail, extending along the Moose River through Brassua Lake to Rockwood and north to Seboomook Landing, and its implications for long-term economic vitality to the region is not considered in the plan.

H. Development of a resort at Big Moose Mountain is not required of a prospective buyer (there is no specific language to assure that the property will ever become a resort), so projected job growth from such a resort is speculative.

LURC Requests:

- A. Request LURC require or conduct comprehensive inventory/mapping of current and potential nature-based tourism assets and experiences. This inventory should include shorelines, riparian habitat and wildlife habitat, inventories of natural communities, defining elevations, views, scenic overviews, and sites that offer public access as well as other high value nature tourism opportunities in the region.
- B. Request that LURC work with the applicant to identify conflicted areas where development might displace or degrade nature tourism assets or “wild feeling” and remote experiences and locate appropriate areas for current and future development.
- C. Request LURC require or conduct an economic analysis of these current and potential tourism resources.
- D. Request LURC require or conduct a comprehensive nature tourism plan for the region that will locate nature tourism sites and experiences to create “Natural Character” zones which offer the same kind of protection as zones created for uses other than forestry.
- E. Request that LURC ask the applicant to recalculate its conservation pond acreage, removing currently protected pond acreage from its “balancing” calculations.
- F. Request that the applicant offer permanent trail corridors whose locations are secured in perpetuity with adequate buffers and protection of viewsheds that secure recreational experiences and trail quality and include appropriate crossings to support forestry operations.
- G. Request that the applicant redesign subdivision and resort plans to include a variety of trails and nature-based experiences and connect subdivision and resort trails (motorized and non-motorized) with current and proposed regional trail systems.
- H. Request that LURC consider the Northern Forest Canoe Trail system for its important natural, cultural features, and as an historic trail corridor with high nature-based tourism value.

3. Wildlife Recreation:

Positives:

- A. Proposal includes a preliminary inventory of most species currently found in this region and discusses some of their habitat requirements.
- B. Plan has a permanent, no development provision for conservation lands in the project area.
- C. Plum Creek says plan must provide a complete, authentic Maine Woods experience and be true to the local culture and environment.
- D. Proposal has language that emphasizes the importance of hunting and fishing to the region’s economy.

- E. Applicant's offer to create permanent conservation lands (with "no development" provisions) within the project area benefits both interior forest species dependent on large landscape conservation and recreational pursuits of hunting and wildlife watching.
- F. Applicant mentions cooperative planning (with state, federal or non-profits organizations) for several species: deer, woodcock.
- G. Applicant's protection of wild brook trout populations on remote ponds (by removal of development plans on some ponds) is an excellent benefit of the proposal.

Needs Work:

- A. Proposal does not acknowledge the importance of wildlife recreation as Maine's largest revenue generating recreational sector (while mentioning the economic importance of other recreation sectors).
- B. Proposal does not include a study of current and projected animal/car collisions and wildlife corridors within the proposed plan area.
- C. Planning for the proposed locations of development (for subdivisions and resorts) has not included a thorough inventory of native plant and animal species, their requirements, and how development can be harmonized with wildlife and habitat needs.
- D. Large "envelopes" of land that adjoin development sites ("envelopes" of land where houses may be sited outside of currently mapped house lots) make planning for the needs of wildlife and recreation difficult.
- E. The proposal includes 32,000 acres of "no development buffers" that adjoin the current planned development. After 30 years, these buffers may accommodate thousands more house lots. This two phase aspect of development prevents effective planning to mitigate the comprehensive effects of the project's rezoning and development on wildlife and recreational access to wildlife.
- F. The proposal does not have information on the total amount of roads (and their locations) that will be connected to proposed development. The proposal lacks discussion of the effects of road building and residential traffic on wildlife species within the project area.
- G. It is unclear what roads will be deeded for access for each subdivision and what legal rights will be.
- H. Intensive roading (woods roads that will combine with new subdivision roads) and development on elevations and riparian areas may have the potential to fragment and degrade habitat and fishing waters.
- I. Phosphorus loading calculations (discharges to area waters that might affect water quality and fisheries) are not complete; they do not include the total amount of roads in proposed subdivisions and are not calculated for Moosehead Lake.
- J. Many subdivision locations are located on soils with L (low) or VL (very low) buildable qualities and the proposal calls for site mitigations that require extensive "fill" and careful regulatory oversight for compliance, possibly jeopardizing the region's famed water quality and fishing resources.

K. Trail development proposed for the project area does not include comparable trail and site planning to accommodate and grow the wildlife economy even as the proposal makes provision for other forms of recreation. (For example: trail access to fishing, conservation of habitat for large game species, sites and trails that support wildlife watching).

L. Plum Creek's wildlife inventory discusses mostly the benefits of young or regenerating forests (harvested areas) on wildlife but omits discussion of additional types of forest habitat requirements. (For example, lynx need mature forests for denning and travel corridors; bear and upland game birds require stands of beech; neotropical bird species favored by birders require mature forests.)

M. Extensive riparian development and back lot creation adjacent to riparian areas in the project area (Long Pond, Wilson Pond, Prong Pond, Brassua Lake, Indian Pond, northwest shores of Moosehead Lake, East Outlet, etc) may fragment important wildlife habitat and travel corridors and reduce recreational opportunity for wildlife pursuits. Landowners' desires to "post" their properties in these areas may conflict with traditional and future wildlife recreational access.

N. The applicant's sample subdivision designs include small amounts of "open space" that are fragmented and do not connect with adjacent habitat or the requirements of resident species.

O. Some of the proposal shorefront buffers are not adequate (100') to retain riparian and shoreland habitat and travel corridors.

P. Class A and Class AA rivers should receive special consideration. East Outlet is a Class AA river with high wildlife values (native fish species, winter shelter for deer, etc, extensive public access and use). This site also hosts educational programs and research for both area students and tourists. The project sites house lots adjacent to the river. Development of adjacent "30 year lands" on Upper Indian Pond may further degrade both wildlife values and public access.

Q. The Moose River's conservation easements do not become effective until Brassua Lake's subdivisions are permitted. This river's Class A status and the fact that its shoreline habitat sustains a federally listed species should require conservation status without conditions.

R. The applicant maintains that its "plan is expected to have little or no adverse impact on lynx in Plan Area given the habitat needs of the species." Proposed resort and extensive subdivision development on Lily Bay peninsula (both shorelines and elevations) are located on areas locally documented with lynx sightings. This area also hosts educational and recreational tracking trips to study and track predators and lynx. Conflicts between wildlife values (habitat, recreation, sporting access, environmental education) and proposed development are extremely likely to appear in this region.

S. New land plan standards need to be at least as protective as the current plans in order to provide the necessary balance to the future of natural resources of the Unorganized Territories, particularly for big game. Enforcement of current regulations for the conservation and/or protection of wildlife has been problematic.

T. Studies of roads, infrastructure patterns, and wildlife collisions have only been conducted outside of the proposed plan area.

LURC Requests:

- A. Request that LURC (as part of its economic tourism analysis), define the economic role of wildlife recreation in the region and clarify the resources, locations, and experiences needed for the continued health and growth of this industry.
- B. Request that LURC or applicant inventory native plant and animal communities within the 1) proposed subdivisions locations 2) within building envelopes where lots may be sited 3) within the 30 year lands that, if rezoned, may host future and adjacent development. This inventory should include social aspects of wildlife recreation: current and future provisions for fishing and hunting as well as access, the retention of wildlife watching opportunities, etc.
- C. Request that this inventory form the basis of a wildlife management plan that makes recommendations for the sustained health of natural communities and species within areas to host development as well as planning that connects this affected habitat to forested areas of the project area (connectivity). The wildlife management plan must accurately map the effects of both road building and shoreline development beyond exact footprints and offer solutions to secure habitat needs (travel corridors, den and nest sites, food and browse opportunities, etc.) and well as the needs of wildlife recreation itself.
- D. Request that LURC evaluate both the inventory and the wildlife management plan in order to locate conflicted sites and create opportunities for the applicant to relocate development to sites with fewer conflicts with wildlife, its habitat needs and important recreational requirements of a wildlife industry.
- E. Request that the applicant reevaluate road systems to more effectively concentrate development footprints in ways that reduce habitat fragmentation or loss of public access.
- F. Request that LURC require a study of the current impact of roads and those projected for additional roads, traffic patterns, volumes, and animal-vehicle collisions and what implication those will have on the proposed development areas within the Unorganized Territories.
- G. Request a full accounting of possible phosphorus loading from all roads used to support development. Request calculations of phosphorus loading in Moosehead Lake from proposed development.
- H. Request that LURC staff review all proposed development sites and recommend removal of sites that do not have soils appropriate for development without extensive fill, mitigation, or enforcement.
- I. Request that the applicant reduce development in remote areas and on high value riparian locations and wildlife corridors as part of the requirement to balance permanent conservation required by law with development in the most affected parts of the proposed project area. In other words, a significant amount of offset conservation must happen on wildlife habitat and wildlife recreation sites that might be most affected by development. More riparian conservation is required to balance proposed development in riparian areas. More conservation in areas frequented by tourists seeking wildlife experiences close to Greenville and Rockwood is required.
- J. Request that the applicant use the most advanced sustainable communities and “smart growth” planning principles in its suggested subdivision plans so that habitat and wildlife recreation are treated as enhancements, opportunities, and responsibilities for homeowners.

K. Request adequate riparian buffers that function both as screens to protect water quality and travel corridors for wildlife and plant dispersal.

L. Request that LURC review and revise as necessary M-GN standards so that it best reflects the values essential to the protection and conservation of the values associated with Unorganized Territory as the UTs move into new types of development outside of timberlands management.

M. Request that Class A and AA rivers receive special consideration for protection as they comprise a small fraction of the state's river mileage and offer important wildlife values, both biologically and economically.

N. Request that LURC have a comprehensive analysis done of the amounts and locations of roads within the proposed plan area, including woods roads that would support development, projected traffic patterns and volumes, wildlife-vehicle collisions, and estimates of wildlife road mortality. Request includes a study of the amount and type of expected "edge effects" these roads will have on wildlife, corridors, and habitat.

O. Request that LURC clarify how and what roads will be deeded for access for each proposed subdivision and what the legal rights will be.

4. Retirement/ 2nd Home Industry:

Positives:

A. Plum Creek's proposal might offer significant housing opportunities to both the retirement and 2nd home industry.

B. The applicant's proposal offers the region an opportunity to conduct comprehensive and predictable planning throughout the watershed (90% of which is owned by Plum Creek).

C. The applicant offers a variety of locations and possible subdivision plans that might appeal to various market segments. Various sites offer different characteristics.

D. Sample subdivision plans include open space and riparian setbacks.

E. The current plan generates a creation of construction jobs for the next 10-15 years.

F. The applicant recognizes the appeal of the region's outdoor assets (woods, waters, wildlife) in choosing to locate development in areas that capitalize on these assets.

Needs Work:

A. The proposed development areas need a complete survey and inventory of past development (location and type) to determine how many lots/homes are currently available. Need market analysis to determine demand and need for project's housing and resorts and demand for various price levels of lots/homes.

B. The plan seeks to address a perceived "crisis" of a declining population as a show of a need for the build-out of large, permanent homes in the remote areas of Unorganized Territories. According to US

Census data and UT annual reports, Greenville has long held a stable population (although the demographics have changed). Some areas of the Unorganized Territories have seen an increase in population over the last 10-15 years.

C. Plum Creek's Colgan economic report says construction jobs will not cause people to move permanently to the Moosehead Region and they will not create new business. We need a different real estate development model to secure long-term economic growth.

D. A detailed investigation has not been conducted on areas proposed for development in remote areas. Much building is proposed on poor soil sites, low-lying/wetland areas.

E. The location of proposed development and the total number of proposed lots are of great concern. Well planned development that uses "smart growth" and sustainable community principles located near Moose Mountain, Greenville and Rockwood village will provide jobs and growth while maintaining the special wild places that define the "Moosehead brand." The large "envelopes" that may move subdivision lots from one envelope to another make planning for wildlife, open spaces, and public access difficult.

F. Resort dwellings are not clearly located on planning maps and the types of dwellings are not identified.

G. The proposal has 32,000 acres that are currently marked as "no development buffers." However, after 30 years, these lands are available for more development so that rezoning now would make that 32,000 acres available to host thousands more house lots in the near future.

H. Subdivision owners or resort property owners who purchase lands from Plum Creek should be required to adopt all of the mitigating strategies and protective language suggested in this proposal.

I. Owner associations (yet to be created) for over 56 subdivisions will be in charge of road, open space and setback/screening management that might affect water quality and scenic assets of the region. Owner associations may not be active during early construction and site modification phases of development.

J. Sample subdivision plans and maps do not use the most current expertise with either site location design or building design.

LURC Requests:

A. Request that LURC obtain a market analysis to determine the demand and need for the proposed housing and resorts and the demand for various price levels of lots/homes.

B. Request that LURC obtain a complete survey and inventory of past development (location and type) in the plan area and another inventory to determine the current number and rate of new homes being built, average market value, and current sale price in order to accurately project the impact of the current real estate market, populations, and those absorption rates to the region.

C. Request that LURC obtain an economic analysis of how to manage the construction industry so that it does add working families to our region, children to our schools, and genuine business growth to our communities.

D. Request that LURC investigate the suitability of proposed sites for construction of buildings and the compatibility of uses.

E. Request that LURC limit the size of building envelopes and prevent building lots from being moved from one envelope to another.

F. Request that LURC ask the applicant to locate all development and housing units for resort properties on its plan maps and clarify the types of dwellings it is proposing (time-shares, hotel suites, condos, vacation homes, etc.)

G. Request that LURC research the nature tourism sites and experiences, resource values and wildlife habitat on lands that are now designated as “30-year no development buffers.” Request asks that LURC zone high value buffer areas as “Natural Character” zones that would not be available for development at any future time and have the remainder of the 30-year no development buffer retained as an M-GN zone so that future development would be guided by a thorough review process.

H. Request sale and purchase agreements that bind owners and owner associations to covenants that manage and mitigate the effects of development (screening standards, lighting requirements, height restrictions, square footage, design criteria, setbacks, etc.).

I. Request that LURC accurately assess the amount of oversight and enforcement required by the applicant’s resorts and subdivision construction and create a funding strategy to secure the required staffing and resources to ensure compliance with LURC and Concept Plan land use regulations. Mitigation strategies must be the responsibility of the developers, and compliance should be LURC responsibility, the cost of which should be borne by the applicant.

J. Request that LURC conduct an independent soils analysis to determine buildability in proposed subdivisions and resorts.

K. Request that LURC require the applicant to submit subdivision planning that uses site designs, building requirements and footprints that are compatible with and reduce the impact to the region’s natural landscape.

Seventeen Planning Guidelines for a Sustainable Moosehead Region Future

1. Development Near Communities:

Positives:

A. The revised plan relocates one of the two resorts included in its original proposal to the Big Moose Mountain area. This site is an appropriate location for development near the communities of Greenville and Rockwood.

B. The proposal uses language that supports planned homeowner associations.

- C. The proposal uses language that supports broad-scale conservation.
- D. The proposal uses language that supports sustaining the authentic Maine woods life and experience.

Needs Work:

- A. The current proposal still includes an unacceptable level of backcountry sprawl: shorefront and back lots on remote areas of Big and Little Brassua Lakes, shorefront lots at Big W Township, and extensive development (shorefront lots, back lots, and a resort) on the Lily Bay peninsula.
- B. There needs to be a thorough professional analysis to evaluate the proximity of development to existing roads and utilities. Homeowner association roads should be owned by the lot owners and connect directly to existing town, county, or state roads. Residential development should not exist where utilities are not available. Roads should be built to standards that would be acceptable to the town or county. Developments should be within 1-2 miles of existing approved town, county or state roads. This close-in development will enhance communities and not put an undue burden on county taxes. Development that is allowed to sprawl into outlying areas will set an unacceptable precedent that will lead to poorly planned roads that cannot be maintained, expensive or unavailable utilities, poor community connections, and habitat loss.
- C. There needs to be a more detailed analysis of subdivision layout, building design, building size (sq. footage) and landscaping. (See the Plans description and development guidelines, sections 5 & 6.)
- D. There is a concern about the boathouse concept that allows numerous buildings to be built on the water. Buildings ought to conform to existing standards regarding size, distance from the water, frontage, etc. (See plan description, section VIII, pg. 37.)
- E. The conservation offered as balance in the application is not broad-scale and does not set a balancing precedent between broad-scale conservation and broad-scale development.

LURC Requests:

- A. Request that the applicant withdraw its proposal to develop residential house lots on Little Brassua and the northwest of Big Brassua Lake and at Big W Township.
- B. Request that the applicant revise its proposed development for the Lily Bay peninsula in conformance with the Moosehead Region Futures Committee's "Citizen Solutions" map, which recommends only limited residential development consistent with "smart growth" principles (shared water access; clustered housing) and existing development in the immediate area; no resort development is recommended.
- C. Request that LURC require sale and purchase agreements that bind owner associations to covenants that will ensure there will be no adverse impact to existing communities.
- D. Request that LURC require that balancing conservation be offered near each community that will be developed.

E. Request LURC ensure that proposed zoning standards are at least as protective of Unorganized Territory as are the current land use standards. Zoning standards may need to be changed and added to in accordance with planned development and the uses/character/protection of Unorganized Territory, including traffic, infrastructure, personal watercraft, mining operations, wildlife corridors sustainable forestry and habitat.

2. Permanent Conservation:

Positives:

A. Plum Creek's current proposal offers more permanent conservation than its initial proposal.

B. Plum Creek says its plan must provide a complete, authentic Maine Woods experience and be true to the local culture and environment.

Needs Work:

A. Plum Creek's current proposal covers 404,000 acres of land. Plum Creek is offering 72,000 acres of permanent conservation easements at no cost to balance its proposed development. These easements cover only 18% of the plan's land area. This conservation does not amount to adequate balance (considering both acreage and monetary value as balance criteria), given the scope of the development being proposed and the considerable financial gains Plum Creek will receive.

B. Total acreage of mitigation conservation should be significantly increased. There is not fairness in its location, as most of the application's conservation is on the east side and most of the development is proposed for the west side. The required conservation should be given in total upon the approval of the concept plan. If the developer fails to develop the last lots, some of the most significant high value lands will not be conserved. Thus, the chance to permanently conserve these high value lands will be lost.

C. Not all easements offered as balance for proposed development will be granted upon LURC approval of the proposal: currently, the Moose River easement and easements on developed lakes and ponds are contingent upon future shorefront subdivision approval. The Moose River Easement (623 acres, 5 miles of river frontage) and easements on developed lakes and ponds (4300 acres, 71 miles of shore frontage) include Moosehead and Brassua lakes, Long, Burnham, Prong, Indian and Upper Wilson ponds. (Petition for Rezoning, section 22, pg. 1.)

D. Lands put into conservation should include more high value lands like rivers, lake frontage, and mountain tops. These are the very places that enhance and support the Moosehead region into perpetuity. Mitigation conservation must include near-in areas, such as Prong and Indian ponds, and remote areas, such as Big W waterfront, the west arm of Brassua Lake and Lily Bay.

E. The precedent of lot-to-land conservation ratio has never been more important. All future landowners will use this formula. If it is too small, we will start down the road to thousands of homes in the Unorganized Territory. Precedents will include: 1.) Improperly located development leading to sprawl and 2.) Unbalanced developed lot-to-land conservation ratios. (Reference the MRFC map interpretation.)

F. The Conservation Framework ought not to be considered as part of the Plum Creek concept plan application.

G. How LURC can properly enforce sustainable forestry and harvest measures within the proposed permanent conservation easements so that conservation values are retained is of concern.

LURC Requests:

A. Request that the applicant significantly increase the amount of permanent conservation offered as balance for proposed development.

B. Request that LURC require that all easements offered as balance for proposed development be granted immediately upon LURC approval of the proposal.

3. Guaranteed Public Access:

Positive:

A. Plum Creek's current application proposes guaranteed public access over protected property.

B. Plum Creek says the plan must provide a completely authentic Maine Woods experience and be true to the local culture and environment.

Needs Work:

A. The majority of the conservation acreage that would offer public access falls under the terms of the Conservation Framework. Enactment of this Framework would depend upon the fundraising abilities of private conservation groups, and therefore approval of Plum Creek's application by LURC would not necessarily ensure the public access proposed for lands covered by the Framework.

B. More information is required as to what activities would be allowed in conservation lands offering public access and how these activities would be managed, monitored, and regulated (in particular, how any regulations governing such activities would be enforced).

C. It is not clear whether or not the public will be guaranteed access to all conservation lands, including through development areas and resorts.

D. Some special high value places should be placed into conservation where public access outweighs the short-term profit from development, such as the remote shore at Big W Township, Little Brassua Lake and the western arms of Big Brassua Lake, and Lily Bay. Big W and Brassua Lake are part of the Northern Forest Canoe Trail and should have more protection. The shoreline of Big W is the last significant undeveloped land on the northwest shore of Moosehead Lake. Along this stretch there is a pebble beach that affords one of the only places a small boat, canoe or kayak can pull up onto the shore between Rockwood and Seboomook. (As cited in the Petition for Rezoning, Section 16, pg. 4.)

E. The East Outlet's famous fishing and whitewater boating experiences are at risk from potential intense and adjacent development.

LURC Requests:

- A. Request that the applicant significantly increase the amount of permanent conservation, with guaranteed public access, offered free of charge as balance for proposed development.
- B. Request that the applicant provide more information about how these recreational activities would be managed and how any applicable regulations would be enforced.
- C. Request that the applicant provides assurances within the plan that public access is guaranteed through all conserved lands.
- D. Request that LURC ensure the protection of the high public, natural, historical, and cultural values of the East Outlet resources.

4. Rivers, Ponds, Habitat Conserved:

Positive:

- A. Plum Creek says its plan must provide a complete, authentic Maine Woods experience and be true to the local culture and environment.

Needs Work:

- A. Federal designation of Canada lynx critical habitat is currently in progress, with the final designation expected this fall. Plum Creek's request to the Dept. of the Interior to waive "critical habitat designation" for lynx on all its US lands and replace lynx management with existing forest management practices threatens to delay and degrade the process of lynx conservation until after LURC grants approval of some version of the proposal.
- B. Specific concerns regarding protection of lynx habitat reflect the larger concern that adequate wildlife habitat protection cannot be guaranteed by allowing private companies to set their own management standards. This concern extends to deer wintering habitat within Plum Creek's plan area. Plum Creek's standards for managing deer wintering habitat fall short of those set by Maine's Department of Inland Fisheries and Wildlife.
- C. The remote habitat surrounding Little and Big Brassua lakes, and the famed fishing and whitewater boating experiences and deer wintering habitat at the East Outlet, are at risk from potential intense and adjacent development.
- D. Concept plan needs third party analysis to determine what to conserve. Essential habitat and corridors have not yet been identified in relation to the proposed development areas.

LURC Requests:

- A. Request that LURC include a provision in any permit issued to Plum Creek such that later designation of Canada lynx critical habitat would still be valid in areas covered by the permit.
- B. Request that LURC require that deer wintering habitat within proposed conservation lands be managed according to standards that meet or exceed those set by the state of Maine.

C. Request that LURC require a clause for the modification of any development plans for the Unorganized Territories to be done in the future for the purposes of protecting important habitat, land and water features, especially if the proper accounting has not been conducted.

5. Business Benefits:

Positives:

A. Nature-based tourism is identified as a long-term economic benefit for the region.

B. The proposal helps sustain an important job market with the acknowledgement of nature-based tourism.

C. The proposed resort near Big Squaw ski area may create a long-term benefit to the region and enhance future business interests.

D. Over the next 10-15 years the plan helps increase the number of construction jobs available in the region and helps increase jobs in the service industries.

Needs Work:

A. Once the next tier of 2nd homes are built, jobs within the construction industry are reported to decline or more pressure will be added to create additional rounds of permanent houses expanding in the Unorganized Territories. This spiraling will, in effect, continue to create social/infrastructure problems and further unintended clashes with the value of the UTs. The Colgan report states that “sustainability depends on adhering to appropriate tourism principles which make the region attractive, not degraded by uncontrolled, intensive use of the natural resources.”

B. The closer development occurs to existing towns the more money will be generated by local businesses. Development occurring in remote areas tends to attract the “bring from home and stay away from town” type of visitors.

LURC Requests:

A. Request that LURC seriously consider in its planning and oversight the long-term basis for business within the Unorganized Territory.

B. Request that LURC require a study be conducted to estimate the number and types of jobs that will be available to local residents in the Unorganized Territory. (See plan appendices A and C, which indicate the market has not yet been analyzed or data collected within the proposed plan area.)

6. Intact Forestlands:

Positives:

A. Plum Creek says its plan must provide a complete, authentic Maine Woods experience and be true to the local culture and environment.

Needs Work:

- A. Sustainable forestry, 2nd home development, care of the UT habitat, and culture have not been adequately investigated. Intact forestlands, in relation to big game and real estate growth, is questionable (deer wintering yards, lynx habitat, critical bird habitat, and brook trout spawning areas are some examples).
- B. Traffic studies, impacts (including wide areas taken up by roads, road shoulders, ditching, clearing, etc.), the costs and to whom of additional roadways in the UTs have not been conducted in the plan area.

LURC Request:

- A. Request that LURC or the applicant provide third party analysis to determine what the capacity is for development that may sustain an intact forestland.

7. Nature Tourism Experiences Protected:

Positives:

- A. Plum Creek says the plan must provide a complete, authentic Maine Woods experience and be true to the local culture and environment.
- B. Nature-based tourism is identified within the proposal as a long-term benefit.
- C. The proposal may sustain an important job market and cultural heritage with nature-based tourism.
- D. The proposed resort near Big Squaw ski area may create a long-term benefit to the area.
- E. Proposed broad-scale conservation will protect a prime economic benefit and the value of the region.

Needs Work:

- A. True broad-scale conservation is not part of the current application, though broad-scale development is. As proposed, broad-scale development extends into raw, remote areas of Unorganized Territory.
- B. Our “Citizen Solutions” map indicates “suites” of high value nature tourism experiences. These are areas offering exceptional outdoor experiences that we believe are essential for the protection and growth of nature-based tourism in our region. The current Plum Creek application proposes development in certain areas that we believe will degrade our region’s potential for nature-based tourism. Areas where we see a conflict between proposed development and nature-based tourism include:
 - 1) Lily Bay peninsula
 - 2) Prong Pond
 - 3) Upper Wilson Pond
 - 4) Upper Indian Pond
 - 5) Little Brassua and the northwest of Big Brassua Lake
 - 6) Big W Township

- C. Plan calls for provisions that encourage large-scale development into raw areas and incompatible uses, including large-scale housing developments, large-scale boathouses for large-scale machine oriented diversion, which are not in keeping with offering the long-term economic benefit of the Moosehead “brand” of tourism.
- D. Current plan calls for creating a critical mass of development, though the majority of it is located in remote locations, far from the service centers, in raw locations that would degrade the character of the region of its future economic vitality.
- E. Trails can be moved with only 30 days notice: trail corridors could be degraded or made impassible by relocations. Guidebooks and maps would not accurate.
- F. The East Outlet’s famed fishing and whitewater boating experiences and its essential deer wintering areas are at risk from potential intense and adjacent development.

LURC Requests:

A. Request that the applicant revise its proposed development for the six areas above in conformance with the recommendations of the Moosehead Region Futures Committee’s “Citizen Solutions” map, as detailed below:

No further development in the following areas: Prong Pond, Upper Wilson Pond, shorefront of Upper Indian Pond, Little Brassua Lake, the northwest of Big Brassua Lake, and Big W Township.

On the Lily Bay peninsula: only limited residential development consistent with "smart growth" principles (shared water access; clustered housing) and existing development in the immediate area; no resort development.

B. Request that LURC require broad balance between reaching a critical mass of development near established service centers and the protection of remote areas that offer a valuable tourism economy and essential natural habitats.

C. Request that snowmobile and hiking trails have permanent locations with provisions for trail crossings to allow for forest management requirements.

D. Request that LURC ensure the protection of the high public, natural, historical, and cultural values of the East Outlet resources.

8. Trail Planning:

Positive:

A. The plan offers hiking and snowmobile trails, which honor the economy and culture of the region.

Needs Work:

- A. With regard to the ITS (Snowmobile) Easement and the Peak-to-Peak Hiking Trail Easement, it is stated on pages IV-15 and IV-16 of the Plan Description that no buffer strips will be required. The lack of buffer strips could greatly reduce the safe usage and scenic value of these trails.
- B. With regard to these two trail easements, it is also stated that Plum Creek will retain “the right to establish reasonable rules, regulations, and restrictions” governing the use of these trails, but no further details are given.
- C. The plan does not consider the long-term value of the location of the Northern Forest Canoe Trail, which traverses along the Moose River through Brassua Lake to Rockwood and along the shore of the northern section of Moosehead Lake to Seboomook Landing. It will be important to have this large stretch of undeveloped shoreline remain intact if this stretch is to remain viable. The long-term value of this recreational trail will be appreciated forever. The tourism dollars generated by the destination use of this resource will far outweigh the economics of remote house lots.
- D. Snowmobile and hiking trails may be moved in order to support forestry operations.

LURC Requests:

- A. Request that the applicant make provisions for substantial buffer strips (see Appalachian Mountain Club guidelines) on either side of the proposed snowmobile and hiking trails, as well as provisions to protect trail viewsheds.
- B. Request that the applicant provide drafts of the regulations that will govern the proposed snowmobile and hiking trails.
- C. Request that LURC reference the Moosehead Region Futures Committee’s “suites of high value nature tourism experiences” (see our “Citizen Solutions” map and map interpretation document) for information on current and potential trails in the region.
- D. Request that LURC remove from the application the development of remote sections that carry long-term economic benefits and sustain the distinct character and vital uses of the Moosehead region.
- E. Request that the applicant offer permanent trail corridors whose locations are secured in perpetuity.

9. Squaw Resort Revitalized:

Positive:

- A. The revised plan relocates one of the two resorts included in its original proposal to the Big Moose Mountain area.

Needs Work:

- A. There is no provision within the application that will guarantee the end use of the proposed “resort” property at Big Moose Mountain. The details of the proposed resort is lacking and needs to be refined in order to evaluate it. Example: what uses are allowed or disallowed? How large will units be and

what type of ownership will it entail (single family homes, condos, timeshares, hotel units, etc.?) What will the resort look like? Although some further development near the mountain may be appropriate, the lack of detail requires the 30-year no-development concept to be eliminated from the plan. There is no limit on how much development may occur in 30 years. This leads to poor planning and considerable uncertainty for the future.

B. Plum Creek still plans to locate a second resort on the Lily Bay peninsula. We believe that a resort in this area would constitute backcountry sprawl, and that any benefits such a resort might bring to the local economy would likely be outweighed by a reduction in the value this relatively undeveloped peninsula offers in terms of opportunities for remote, wild-feeling nature-based tourism.

LURC Requests:

A. Request that the applicant provide specific assurance of the end use of the property proposed for development at Big Moose Mountain.

B. Request that the applicant withdraw its proposal for a resort on the Lily Bay peninsula.

10. Affordable Housing:

Positive:

A. The applicant proposes addressing the need for affordable housing in Greenville by suggesting it may offer land for that purpose to the town of Greenville.

Needs Work:

A. Land is not what is needed; affordable housing is what is needed.

B. Regardless of the offer, the change toward market-driven real estate development and the subsequent rises in property tax, even with some affordable housing to accommodate some people, local residents will not be able to sustain living in the region. The character of Unorganized Territory will be changed to suburban sprawl under the current plan, creating a host of infrastructure and wildlife problems. The application notes that the rate of build-out in the region's Unorganized Territory over the last 30 years amounted to only 570 out of a total of 1508 houses. Over the next 30 years it says that number is expected to double.

C. The creation of some affordable housing in the towns of Greenville and/or Jackman does not address how the current plan, if approved as is, will drive previously affordable homes/small camps that are located in the Unorganized Territories into a new level of unprecedented large, permanent construction and prices. The spiraling costs and large types of construction, if left to its own build-out of capacity in Unorganized Territory, will lead to the change in character and suburban-type sprawl through raw land, with attending infrastructure and wildlife problems within the UTs, for a short-term benefit.

D. Affordable housing needs to be included as part of all subdivision areas. A percentage of each subdivision should be sold as "affordable" to help continue a diverse, well-rounded community. Cluster affordable housing in only one area may serve to identify these homes as less desirable.

LURC Requests:

- A. Require the applicant to include a minimum of 50 affordable housing units to be constructed as a portion of the total number of units proposed, and require that these be the first development of any kind undertaken as a result of approval of this proposal.
- B. Request that LURC review its standards and require the applicant to development nearest to the towns of Greenville and Jackman, and the village of Rockwood, which will keep housing and needed attending services near established services, thereby creating efficient capacity.
- C. Request that LURC consider the implications of clustering affordable housing into one area.

11. Impacts Reduced:

Positives:

- A. The current plan includes the removal of a large resort and lodges from remote Brassua lakes sites to Big Moose Mountain and nearer to already developed areas.
- B. Section V.G (pages V-8 – V-13) of the Plan Description focuses on minimizing negative visual impacts of the proposed development by proposing guidelines, governing such factors as vegetative screening and architectural design, that are intended to limit visibility from roads and water bodies. These guidelines would be commendable if effectively implemented.
- C. The plan proposes to set aside funding from the sale of each lot to support educational and recreational programming.

Needs Work:

- A. It is not clear who would enforce the guidelines for reducing negative visual impacts of development, nor is it clear that penalties for violating these guidelines would be adequate to deter homebuilders who did not wish to obey them.
- B. The proposal does nothing to assure the protection of the Scenic Byway between Greenville and Jackman, as suggested by local communities.
- C. Traffic patterns and the disruption/destruction of wildlife corridors in the Unorganized Territories, especially within the Rockwood area, are not addressed. A study has been done only for the Town of Greenville, an area located far outside of the proposed development area.
- D. Road patterns, traffic volumes, speed, collisions with big game, and construction analysis need to be completed within the Rockwood area, where major development is proposed. Projected traffic volumes, patterns, and crash data are currently highly inaccurate and have been conducted outside of the proposed development areas. This makes it very difficult for a review process to arrive at accurate conclusions.
- E. Crash data as cited in the application is very narrow and outside of the plan area.

F. There is a concern about how possible future mineral extraction would work compatibly to large scale conservation under current guidelines for Unorganized Territory.

G. The plan area calls for a large volume of residential house lots in remote areas, such as Little and Big Brassua lakes and Big W Township, where soils are graded as low-to-medium for residential development. The locations of these developments are far from any major road or infrastructure. The annual drawdown on Brassua Lake is between 23-24 feet, making “waterfront” value a relative term. Creating residential house lots in relation to the drawdown has the potential to create a negative business, social, and wildlife impact, replacing a long-term higher and better economic impact as a suite of resources in its present raw state.

H. No detailed investigations for compatibility to the area have been conducted. Outlying areas proposed for development, such as the northern sections past Rockwood do not meet LURC’s key criteria for lake concept plans.

I. As a Class 3 lake, major development of Brassua Lake does not meet the current criteria, which includes shoreline availability, water fluctuation, location, conflicting uses, regulatory considerations, significant resource values conserved, and unsuitable soils.

J. There is a concern about the boathouse concept that allows numerous buildings to be built on the water. Buildings ought to conform to existing standards regarding size, distance from the water, frontage, etc. The precedent these boathouses would set would have enormous adverse impacts on the values of the region’s shorelines. (See plan description, section VIII, pg. 37.)

K. The plan, as proposed, stretches development across all sections of the Moosehead region. The “North Woods” experience will be degraded because of the development in remote areas. The plethora of docks, moorings, lights, boathouses, and boats will destroy the remote experience. It is evident from existing development that homeowner paths and tree clearing are not in compliance with present LURC regulations and it is probably unrealistic to expect these activities to be properly regulated. It is also evident that more detail and restrictions need to be included in the plan for the near-in areas in order to protect the “North Woods” experience (i.e. moorings, docks, etc.).

L. Reducing the required shore frontage to 100 feet for clustered development will put an undue adverse impact on the lake resource. (See plan description, section V, pg. 6, shorefront lot dimensions.) Clustered development should include such “smart growth” concepts as shared community dock, swim area, etc.

M. Common shorefront, as illustrated in the plan description, section VI.B.1 and 2, and the small tracts of conservation within the subdivisions will only benefit the lot owners. North Woods scale requires conservation areas that are large, distinct, and separate from the proposed development.

N. It is not clear who will approve a multi-resource management plan (described PD pg. IV-12) and how those plans would be properly enforced.

O. The plan requests that LURC adjacency guidelines be waived (See Petition to Rezoning, sec. 12, pg. 1).

P. The plan suggests that funding generated from Tree Growth penalties will create additional revenues that will support both increased spending for public services to the area and decreases in tax rates to local people.

LURC Requests:

- A. Request that LURC require proper current and projected crash data (including big game-vehicle collisions), road patterns, traffic flow, volumes and speed analysis in the Unorganized Territory included in the plan, i.e. Rockwood area townships, Lily Bay, and Big W.
- B. Request that LURC require a thorough investigation of the compatibility of uses and the impact that a large residential development would have on the remote Brassua Lakes, Big W and Lily Bay.
- C. Request that LURC require sale and purchase agreements that bind owners and owner associations to covenants that will minimize negative visual impacts of development.
- D. Request that LURC assess the required amount of oversight and determine appropriate penalties to enforce compliance with restrictions that will minimize negative visual impacts of development and that LURC develop a funding strategy to secure the necessary staffing and resources for adequate enforcement.
- E. Request that LURC require compliance with Scenic Byway criteria for Route 15 from Greenville to Rockwood to assure protection into perpetuity.
- F. Request that LURC require that impact fees continue to be levied for all re-sales of proposed lots, so that there is an ongoing, rather than one-time, fund established that will help decrease the impact of the pressure for more services.
- G. Request that LURC uphold adjacency guidelines as an essential tool that has helped to direct development in the Unorganized Territories in an orderly, positive way.
- H. Request that LURC require a Multi-recreational Resource Planning Advisory Group, with local and state stakeholders, to aid in the creation of multi-recreation management plans to be part of any Concept Plan for lands that will be available for public access and uses.
- I. Request that LURC have reviewed the criteria the state uses for Tree Growth taxation and how that may or may not benefit the infrastructure and taxation of the people of the Moosehead region.

12. Rockwood Area Reevaluated:

Positives:

- A. The current application has moved a proposed large resort and lodges from remote areas northwest of Rockwood village to Big Moose Mountain and nearer to already established services in Greenville.
- B. The plan calls for some residential lots to be developed near the West Outlet, an appropriate location that is close to Rockwood village, water, plowed road, transfer station, and other services.
- C. Plum Creek says plan must provide a complete, authentic Maine Woods experience and be true to the local culture and environment.

Needs Work:

- A. Traffic patterns and the disruption/destruction of wildlife corridors in the Unorganized Territories, especially within the Rockwood area, are not addressed. A study has been done only for the Town of Greenville, an area located far outside of the proposed development area.
- B. Road patterns, traffic volumes, speed, collisions with big game, and construction analysis need to be completed within the Rockwood area, where major development is proposed. Projected traffic volumes, patterns, and crash data are currently highly inaccurate and have been conducted outside of the proposed development areas. This makes it very difficult for a review process to arrive at accurate conclusions.
- C. Crash data as cited in the application is very narrow and outside of the plan area.
- D. There is a concern about how possible future mineral extraction would work compatibly to large scale conservation as written under the current guidelines for Unorganized Territory.
- E. The plan area calls for a large volume of residential house lots in remote areas, such as Little and Big Brassua lakes and Big W Township, where soils are graded as low to medium for residential development. The locations of these developments are far from any major road or infrastructure. The annual draw-down of the water on Brassua Lake is between 23-24 feet, making “waterfront” value a relative term. Creating residential house lots in relation to the drawdown has the potential to create a negative business, social, and wildlife impact, replacing a long-term higher and better economic impact as a suite of resources in its present raw state.
- F. No detailed investigations for compatibility to the area have been conducted. Outlying areas proposed for development, such as the northern and westerly sections past Rockwood village do not meet LURC’s key criteria for lake concept plans nor the local values as they have been represented in local meetings and scoping sessions.
- G. As a Class 3 lake, large-scale development of Brassua Lake does not meet the current criteria, which includes shoreline availability, water fluctuation, location, conflicting uses, regulatory considerations, significant resource values conserved, and unsuitable soils.
- H. The Northern Forest Canoe Trail travels along the Moose River, into Brassua, Rockwood to Seboomook, an important natural trail corridor.
- I. The plan allows for backlot transfers from the east side of Moosehead Lake to the west side, but not the reverse. The west side of the lake is proposed to carry a large portion of the development and only a very small amount of the mitigating conservation. (See plan description, section V, pg. 5.)
- J. Acceleration of development from 15 to 8 years puts an undue burden on this outlying community to provide services. It will change the character of the village and place its future into on an unpredictable course. (See plan description, Section V, pg. 6.) The Margaret Chase Smith Baseline Development Scenario states that the applicant could develop between 447 to 800 lots over 30 years. It would not be in the interest of this remote area to accelerate the development to 8 years. It is not clear that this would create a benefit to the local community, though it may accelerate income to Plum Creek shareholders. (Appendix D-Q, section O, pg. 1, executive summary.)

LURC Requests:

A. Request that LURC require the thorough investigation of the compatibility of uses and the negative impacts that large residential developments would have on the Brassua Lakes and Big W Township, and consider those in relation to current and future human uses, wildlife and fisheries patterns, and the long-term economic benefits to and character of this distinct region.

B. Request that LURC require proper current and projected crash data, road patterns, traffic flow, volumes and speed analysis in the Unorganized Territory included in the plan, i.e. Rockwood area townships and Big W Township.

13. Roach Ponds Conservation:

Positive:

A. The Conservation Framework agreement includes the potential sale of Plum Creek's ownership on Second and Third Roach Ponds and the lands surrounding them to a conservation organization. If realized, this sale would result in the protection of Second and Third Roach Ponds.

Needs Work:

A. As Director Carroll has previously stated, "the Conservation Framework is offered as a non-regulatory, contingent and voluntary arrangement among private parties...which may or may not be implemented", and LURC currently "has no authority to require Plum Creek to sell or The Nature Conservancy or other entities to purchase and protect the Conservation Framework lands". Given the high value of this area in terms of remote backcountry experiences and wildlife habitat, a greater guarantee of protection than is currently offered under the proposed Conservation Framework appears warranted.

LURC Requests:

A. Request that the applicant guarantee the protection of Second and Third Roach Ponds and the lands surrounding them immediately upon LURC approval of its proposal.

14. Impact Fees For Education:

Positive:

A. The plan establishes a Community Fund to support education and recreation, to be funded through contributions from the sale prices of residential lots.

Needs Work:

A. Under the terms of the current application, money would be deposited into the Community Fund only once for each lot, at the time of its initial sale by Plum Creek. No money would be deposited into this fund if a lot were resold in the future.

B. The plan covers two counties and several communities. There needs to be serious discussions and a mechanism whereby the Community Fund as proposed (plan description, section IV, pg. 27) is distributed fairly. It is unclear how an equitable distribution will occur and where the monies will be used.

LURC Requests:

A. Request that LURC require the continuance of the above impact fee levy for all re-sales of proposed development sites in perpetuity.

15. Tree Growth Benefits:

Needs Work:

A. The plan suggests that monies generated from tree growth penalties will bring additional revenues to support both increased spending for public services to the area and decreases in local tax rates.

LURC Request:

A. Request that LURC have reviewed the criteria the state uses for Tree Growth taxation and how that may or may not benefit the services to and taxation of the people of the Moosehead region.

16. Infrastructure Assistance:

Positives:

A. Plan proposes possible emergency services within resort area.

B. Plan proposes the establishment of a Community Fund to aid in the region's educational and recreational programming.

Needs Work:

A. Governmental services to the village of Rockwood and the surrounding Unorganized Territory located in Somerset County need careful consideration, not political representation from the Town of Greenville, located a minimum of 20 miles distance and in Piscataquis County.

B. The plan's suggestion for the establishment of a regional planning commission needs careful scrutiny or to be eliminated completely from the proposal. The proposal also suggests that a percentage of funding for the Unorganized Territories go directly to the Town of Greenville to help with future services. The Rockwood areas of the Unorganized Territories in Somerset County would suffer if left to a regional planning commission directed by political appointments and considered largely through the Town of Greenville. The character, uses, and remote location of the Rockwood area put the needs and values of this UT in a different category than Greenville environs. Infrastructure needs and services require a wholly different consideration and leadership structure.

C. Plan suggests that the area is in a “crisis” of decline, which is an inaccurate indication of the population patterns and changing needs of the region. Census data records indicate the seasonal population has steadily increased in sections of the Unorganized Territories over the past 10-15 years and, over the past five years, there has been a steady increase of year-round retirees locating into the UTs. Town of Greenville records show that population has remained stable through history, though the demographics have changed, with fewer young families and more middle-aged residents moving in.

D. The Plan Description (VII-2) indicates willingness on the part of Plum Creek to offer an estimated 25 acres for a septic waste facility; however, it is understood that this amount of land would be inadequate to handle the septic waste of the proposed plan area.

E. It is not clear who will approve a multi-resource management plan (described PD pg. IV-12) and how those plans would be properly enforced.

F. The plan suggests that the funding generated from tree growth penalties will create additional revenues that will support both increased spending for public services and decreases in the local tax rates.

LURC Requests:

A. Request that LURC eliminate from the proposal the idea of diverting a percentage of funding from Unorganized Territories to go directly to the Town of Greenville.

B. Request that LURC consider what Rockwood village requires for infrastructure to meet compatible needs and services into the future, including investigations into roads and traffic patterns in compatibility with wildlife corridors, recycling and the transfer station.

C. Request that LURC investigate the needs and services that will be required of the actual population demographic, including hospital, septic waste, and emergency services, in relation to developments within the jurisdiction of the Unorganized Territories.

D. Request that LURC consider the location and cost of providing those services.

E. Request that LURC require a multi-recreational resource planning advisory group, comprised of local and state stakeholders, to aid in the creation of multi-recreation management plans to be part of any Concept Plan for lands that will be available for public access and uses.

F. Request that LURC have reviewed the criteria the state uses for Tree Growth taxation and how that may or may not benefit the local services and taxation of the people of the Moosehead region.

17. Professional Planning & Research:

Positive:

A. Plum Creek says its plan must provide a complete, authentic Maine Woods experience and be true to the local culture and environment.

Needs Work:

- A. Proposal states that all statutory and regulatory re-zoning standards will have been considered met once the plan is approved.
- B. Proposal states that in protected subdistricts, the uses requiring a permit won't be needed if the plan is approved.
- C. Understanding of the flora and fauna in areas proposed for current development and in the 30-year no development buffer is incomplete.
- D. The "Total Development Impact" of new subdivision roads is currently limited to the land actually occupied by the roads, assuming an average road width of approximately 23 feet. A casual inspection of the flora along any road in the Moosehead Lake region reveals that the development impact of a road is greater than the actual width of the road. Roads can also disrupt wildlife corridors, thereby causing adverse impacts on wildlife over areas much larger than the land actually occupied by the roads.
- E. It has not been determined what the total increase in year-round vs. seasonal population is in the Unorganized Territories of the Moosehead region, what it is projected to be, and how that will impact this UT.

LURC Requests:

- A. Request that LURC obtain a thorough third-party survey that clearly identifies and quantifies the flora and fauna of the aquatic, avian, and terrestrial natural communities (including, but not limited to, rare and endangered species) in areas proposed for current development as well as the 30-year no development buffer. This survey should include identification of wildlife corridors.
- B. Request that LURC obtain a thorough inventory of flora and fauna in all areas where construction of new roads is proposed should be performed in order to identify potential adverse ecological impacts.
- C. Request that LURC obtain thorough assessments of the probable impact of proposed development on water quality (and consequent impact on fisheries) in the region.
- D. Request that LURC obtain a third party analysis of the existing and projected population of the Unorganized Territories of the Moosehead region, what the net increase in local population is and what the implications are.

ADDITIONAL COMMENTS:

1. Regarding the noted “Total Development Impact” of the two proposed resorts:

The proposed Big Moose resort would cover 2600 acres and the proposed Lily Bay resort would cover 500 acres (see page I-6 of the Plan Description). However, the reported “Total Development Impact” for these resorts is currently limited to the maximum building footprint (130 acres for the Big Moose resort and 25 acres for the Lily Bay resort). The remainder of the land covered by these resorts (2600 acres minus 130 acres, or 2470 acres, for the Big Moose resort and 500 acres minus 25 acres, or 475 acres, for the Lily Bay resort) appears in the statistical summary (on page II-1 of the Plan Description) in the category “Open Space (within envelopes)”, which is classified under “Conservation for Balance”. To provide an example of what this calculation means, the golf course at the proposed Big Moose resort is currently classified as “Conservation for Balance”. *All* land covered by each resort should be included under “Total Development Impact”; *none* of this land should be counted as “Conservation for Balance”.

2. Regarding the likely impact of proposed development on public school enrollment:

Despite LURC's approval of permits for 1106 new dwellings in our region between 1975 and 2004, the public school census for Greenville and the region as a whole declined by approximately 40% over the same period. These statistics indicate that the development proposed by Plum Creek is unlikely to produce an increase in public school enrollment. [Note: These statistics are drawn from data presented in Table 24 on pages IX-73 – IX-75 and Table 19 on page IX-59 of the Plan Description.]

3. Plan description, section VIII, Land Use Standards:

It is difficult to analyze this section thoroughly without a redline copy of the changes from the current regulations. The boathouse concept is but one major problem.