



November 17, 2020

Re: Moosehead Regional Planning Process

Dear Ms. Kirk-Lawlor,

On behalf of the Natural Resources Council of Maine (NRCM), I am writing with initial comments on the regional planning process for the Moosehead Lake Region. As stated in NRCM's May 13, 2020 letter regarding termination of the Moosehead Lake Region Concept Plan (ZP 707 B), NRCM is cautiously optimistic about the possibilities for sustainable economic growth in the Moosehead Region that preserves the unique natural character of the area. As LUPC staff continues contacting stakeholders, refines timing and objectives for this planning process, and prepares discussion maps for public input, we would like to reiterate recommendations we previously made regarding planning and zoning priorities as well as submit additional comments.

We strongly support a planning process for the Moosehead Lake Region that involves and ensures community support, resulting in a plan that will help the region balance natural resource conservation with economic development. Further, we understand that the LUPC intends to make rezoning decisions that align with planning efforts that the Moosehead Region has already completed, including a branding initiative and regional master plan. We agree that this is a smart way forward and note that both initiatives emphasized the high value of the region's natural and scenic character. We were also pleased to see that the Commission and Weyerhaeuser came to agreement to move the timeline for the process back by six months to December 2022 due to challenges presented by the COVID-19 pandemic.

In addition to matters of process, NRCM would like you to consider the following recommendations for the regional planning effort at this early stage.

Protection of natural and scenic resources is paramount for long-term ecological health and the viability of the recreation and tourism-based economy.

Retaining natural character and vibrant recreational opportunities are key ingredients for a successful future in the Moosehead Region. People have been vacationing and recreating in the region for centuries largely because of the area's striking landscape features, like Mount Kineo, and its location as a gateway to many spectacular parts of Maine's North Woods. Moosehead is also home to rare wildlife species, like rusty blackbird and Canada lynx, as well as more common species, like moose and brook trout, that help attract millions of visitors to the North Woods each year. The natural and scenic character of the region is ecologically, culturally, and economically significant. To maintain this character, we believe some areas around the lake warrant additional permanent protection from development.

LUPC has asked whether NRCM supports expanding the scope of this planning conversation to the gateway entry points to the region. We support doing so, adding entrance routes such as Route 6/15 south of Greenville, the Scenic Byway between Rockwood and Jackman, and Route 6/15 in Big Moose Township, to the extent that it wouldn't impose undue burdens on nearby landowners and would serve

to enhance continuity of planning. If these areas were to be included in the regional planning process, we believe the LUPC should seek to maintain their natural and scenic character and reflect those values in zoning decisions.

New development zones should be established in response to specific needs of the community, compatible with existing development, and located adjacent to organized towns.

Both in its guiding principles of the Comprehensive Land Use Plan and Location of Development rules,¹ the LUPC recognizes the importance of preventing sprawl. As such, we hope this planning process and any associated rezoning decisions guard against development sprawl. With responsible, well-designed development, new homes and businesses concentrated near existing development will protect the viability of existing businesses, reduce costs associated with sprawl (e.g., emergency, fire, and infrastructure costs), and help maintain the character of the region. Any new development zones should be located near existing development to avoid burdening service areas, fragmenting wildlife habitat, and diminishing character. Both Greenville and Rockwood could benefit from new businesses, affordable housing, and resources for families that match the values of the region, but much of that can be built within town boundaries. To compliment development and infrastructure within Rockwood and Greenville, NRCM urges LUPC to allow only limited additional development in its jurisdiction and to focus any such development immediately around existing towns and service areas.

Since the Moosehead Region Concept Plan was approved, the adjacency rule was amended, which has major implications for development in the Moosehead Region and, therefore, should be evaluated through this process.

We are mindful of the impact of the adjacency rule amendments, adopted in April 2019, on areas that may be rezoned. Under the new adjacency rules, virtually all the 16,910 acres being rezoned pursuant to termination of the Moosehead Region Concept Plan (MRCP) is still vulnerable to development, as these areas are located in Primary and Secondary Locations. Although being in a Primary or Secondary Location does not automatically mean these areas will be developed, it does not eliminate the possibility of inappropriate development if Weyerhaeuser or a future landowner proposed to build there. This change of status due to termination of the MRCP could mean fewer protections for the region's natural character and wildlife habitat. During the adjacency rule revision process, little specific attention was devoted to the Moosehead Region because of the existence of the MRCP. For that reason, we ask that the Commission consider the implications of the Primary and Secondary Locations given the absence of a Concept Plan and whether any changes or exemptions are necessary.²

The threat of climate change and pressure from real estate interest have increased over the past year, and rezoning decisions should be made in these contexts.

Since the adjacency principle was amended and Weyerhaeuser requested termination of the MRCP, two significant developments have occurred that should affect this planning process. First, the COVID-19 pandemic has caused an increase in real estate interest in northern and coastal Maine. Second, Maine state government has completed a year-long climate planning process under the auspices of the Maine Climate Council and proposed a broad range of strategies, some of which focus on land use and

¹ See Comprehensive Land Use Plan Sections 4.3.B and 10.08-A.

² See Land Use Planning Commission Rules 10.08-A (C)(5).

forestland conservation to enhance carbon storage and sequestration and wildlife protection. Both are relevant to the regional planning process.

Regarding climate, there is a growing body of scientific evidence that climate change will negatively impact Maine people, the economy, and ecosystems and that it is already taking a toll. In terms of ecological impacts, two-thirds of Maine species are highly or moderately vulnerable to climate change. Habitat connectivity and wildlife corridors support species survival and resilience to climate change, which is particularly important given global declines in biodiversity, including in Maine. Species such as Canada lynx, moose, white-tailed deer, and black bear, which inhabit the Moosehead Region, rely on large home ranges and, with increased stress from climate change, would be pushed to the brink if increased development is an added threat. In addition to benefiting wildlife, natural landscapes sequester more carbon than developed or degraded landscapes, which aids in climate change mitigation, a statewide priority. Unfragmented natural habitat helps keep intact life-sustaining ecosystem services – like air and water filtration, flood control, and nutrient cycling – that we all rely upon. Rezoning decisions should be made with the latest climate science in mind.

The other major factor at play is the significant increase in real estate interest in Piscataquis County in 2020. Though real estate and development interest has steadily risen since the 1980s, the increase this year was rapid, increasing demand for first and second homes and causing a surge in home prices. This could lead to pressure to develop lots of land with views of the lake or make seasonal roads permanent, which gradually can start to degrade the natural character of the region. The remote character is what makes Moosehead Lake special and that needs to be preserved. Current and projected future changes in real estate interest will be important to consider during the regional planning process.

The Moosehead Region is an area of local, statewide, and national significance cherished by many. Any planning process should endeavor to strike the right balance of protecting the natural resources and character of the region while allowing sustainable, compatible development where appropriate. Thank you for your consideration of these comments. We look forward to participating in the regional planning process as it moves forward, including as you create discussion maps for public input.

Please let me know if I can provide additional information or answer any questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Melanie Sturm".

Melanie Sturm
Forests and Wildlife Program Director