



September 30, 2021

Re: LUPC Moosehead Region Planning Project Discussion Scenarios

Dear Ms. Kirk-Lawlor:

On behalf of the Natural Resources Council of Maine (NRCM), I am writing to provide comments on the discussion scenarios related to the Moosehead Region Planning Project.

Before providing comments on specific parcels being rezoned and the four scenarios, I would like to share several points about the planning context that NRCM believes should influence decisions made through this process.

- In addition to the many other co-benefits of forestland conservation, there is immense value in keeping forests as forests because of the climate benefits forests provide to Maine, as mentioned in *Maine Won't Wait*.¹ One outcome of this planning process for the Moosehead region should be zoning and planning decisions that are in alignment with the state's Climate Action Plan, which states that "Protecting natural and working lands is critical to maximize carbon storage, support working farms and forests, ensure valuable ecosystems remain in place for future generations, and contribute to Maine's fight against the effects of climate change."² Toward this end, we believe this planning process should strive to avoid forest conversion in the Moosehead Region, which is part of the largest undeveloped tract of forest east of the Mississippi River. Concentrating development near existing development helps avoid sprawl and habitat fragmentation, allowing the land to continue to sequester and store atmospheric carbon dioxide. Land conservation and sustainable forestry management are essential strategies to mitigate and adapt to climate change and to help the State meet its climate goals.
- Protecting natural and working lands helps maintain ecological resilience and creates wildlife corridors that will be necessary due to climate change. A healthy, resilient ecosystem is needed to withstand disturbances caused by climate change so that the ecosystem can continue to deliver important goods and services that Maine people and our economy rely on. As climate change progresses, some species will be forced to transition to different locations. To help preserve wildlife in Maine, the state should proactively protect wildlife corridors in the Moosehead region, as identified by The Nature Conservancy, so species can travel through suitable habitat as their range and the climate shifts.³
- The heightened development pressure in the LUPC service area that started in 2020 has not returned to pre-pandemic levels, especially in the Moosehead Lake region. As we mentioned in our November 2020 comments, this regional planning process is the perfect time to plan for current and future residential growth to intentionally direct development to appropriate areas

¹ https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/MaineWontWait_December2020.pdf

² *Maine Won't Wait*, p 76.

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<https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/edc/reportsdata/terrestrial/resilience/Pages/Maps.aspx>

in the region. Doing so will help prevent Moosehead from falling victim to sprawl, ecological degradation, and commercialization that have caused significant impacts to water quality and other natural resource values in many other large lakes in New England.

- One of the three major goals of the Moosehead Lake Economic Development Corp.'s branding initiative is to maintain the natural and cultural character of the area,⁴ which clearly recognizes the economic, not just the ecological, impacts of protecting viewsheds and natural resources. Because future uses of Weyerhaeuser's land will affect the implementation of this branding initiative, the LUPC should strive to designate zoning that respects the work and objectives of the Economic Development Corp.

With those overarching comments in mind, I have recommendations about specific parcels the LUPC is considering rezoning and about the placement of primary and secondary locations:

Protect areas of high ecological, recreational, and scenic value through zoning

- **As in LUPC's scenario 4, we recommend designating new protection subdistricts but would strongly encourage zoning Lily Bay Twp. for protection as well.** The LUPC should designate protection zoning for Lily Bay Twp. because this is an area with high conservation and remote recreation value. Lily Bay abuts other conservation land, including Weyerhaeuser easements and Lily Bay State Park. It is also critical habitat for the federally threatened Canada lynx as well as habitat for Rusty Blackbird (a state species of special concern) and wild native brook trout.⁵ Traffic is a threat to lynx because they are a highly mobile species and often cross roads. More development will increase traffic, therefore putting lynx in jeopardy and the survival of this Endangered Species Act-listed species at risk.
- **Zone the west side of Moose Mountain in Big Moose Twp. for protection.** The west side of Moose Mountain is in direct view of scenic Indian Pond, and it provides hiking trails and remote recreation opportunities. It is also habitat for Rusty Blackbird as well as brook trout, according to Maine Department of Inland Fisheries and Wildlife (DIFW). It seems appropriate for the east side of the mountain to remain a general management subdistrict and as currently zoned because of the resort renovations in that area.
- **Designate special protection zoning for Blue Ridge, south of Rockwood.** We strongly support the feature of scenario 4. Blue Ridge is very visible from surrounding areas, including Mount Kineo. It would spoil the character of the region and would be deeply unpopular if the ridge were developed.
- **Designate new protection zones on the parcel at the southeastern side of Long Pond and designate a new residential zone, as mentioned in text box A of scenario 4, where residential homes already exist on the southwestern side of the lake.** This new protection zoning on the southeastern end of Long Pond would protect inland wading birds and waterfowl habitats identified by DIFW and would concentrate development where it already exists.

Create new adjacency rule exemptions by removing primary and secondary locations

- **Remove primary location from Lily Bay Twp.** because of the significant wildlife and recreation values. Development there would contribute to unnecessary sprawl and would be incompatible with surrounding land uses. We strongly support this feature of scenario 2.

⁴ <https://www.mooseheadlakeedc.com/economic-development/branding-initiative>

⁵ Federal Register vol. 74, no. 36. page 8642

- Remove primary location from Big Moose Twp.** We strongly support this feature of scenario 2. Outside of the ski resort area, which provides ample space for new commercial and residential development, Big Moose Mountain and the surrounding area has significant ecological and wildlife values. Development in this township outside of the ski area would contribute to unnecessary sprawl and habitat degradation for Rusty Blackbird and species reliant upon late-successional forest. According to the Bureau of Parks and Lands’ 2017 Moosehead Region Management Plan, “[h]igh elevation areas of Big Moose Mountain are dominated by Fir–Heart-Leaved Birch Subalpine Forest, ranked S3 (rare in Maine) by MNAP. An exemplary Spruce-Northern Hardwoods Ecosystem has been identified along the central part of the Little Moose Mountain ridgeline with exceptional natural communities that include Low Elevation Spruce-Fir Forest and Beech-Birch-Maple Forest. Both are common forest types but are considered exemplary because of the stand composition of mature trees with an old growth component, including areas of old growth.”⁶ These exemplary natural communities, and buffer zones around them, should be protected from development and forestry activity.
- Remove primary and secondary locations from Sandwich Academy Grant, Indian Stream, and Sapling Twps.** Although some of the areas designated as primary and secondary locations already have some development, these townships are far enough outside of town centers that they should not be considered go-to places for additional development. Per our earlier comments, incremental sprawl can chip away at the character of the region. In order to support business in Greenville and Rockwood and to avoid burdening services there, these townships should not be in the primary and secondary locations.
- Remove primary and secondary locations from Brassua Peninsula.** Brassua Peninsula includes habitat for the Rusty Blackbird, brook trout, inland wading birds and waterfowl, and high-value wetlands and riparian habitat, according to DIFW, and therefore it is not an appropriate location for development. This recommendation is in line with features of scenario 2, but we would encourage removal of additional areas from the primary and secondary locations.
- Remove primary locations from southeastern end of Long Pond.** The habitat on Long Pond for inland wading birds and waterfowl, as identified by DIFW, should be protected. We recommend keeping the primary locations on the southwest side of Long Pond. This recommendation is in line with features of scenario 2, but we would encourage removal of additional areas from the primary and secondary locations.
- Remove all primary and secondary locations in areas that are under permanent conservation easement** because those areas cannot be built on anyway (for the most part) and could lead to confusion. This recommendation is in line with features of scenario 2, but we would encourage removal of additional areas from the primary and secondary locations. We understand the LUPC prefers to remove primary and secondary locations on a township-by-township basis; however, we encourage the agency to find ways to communicate clearly through mapping or through a listed exemption under LUPC Rule 10.08-A (C)(5) that conservation easements are not suitable locations for development.

Designate development zones near existing towns and compatible development

- The former development zone at Harford’s Point may be an appropriate place for additional residential development, and we support this feature of scenario 4 in text box E.** Harford’s

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https://www.maine.gov/dacf/parks/get_involved/planning_and_acquisition/management_plans/docs/MooseheadMgmtPlan-FINAL-part1_reduced.pdf

Point Twp. and the nearby ski area at Big Moose Mountain Resort overlook the lake and have already been partially developed. However, when the new development at the resort is built out, there will be a lot of new housing and accommodations, creating more traffic. Greenville and Rockwood may benefit from this increased activity, but there is a point at which the towns reach capacity for the number of people, businesses, and existing infrastructure they can support. Therefore, new residential development at Harford's Point should be modest and dispersed.

- **We agree with text box F of scenario 3 that mixed residential and commercial use near the Beaver Cove Town Office that is narrow in scope may be appropriate. Similarly, we agree with text box D of scenario 3 that more residential development adjacent to existing residential development, the Rockwood Bar and Grill in Rockwood, and as close as possible to the Town Landing may be appropriate.** The towns of Rockwood and Greenville being small communities with full-time residents and year-round services could benefit from additional development within and immediately surrounding town boundaries. Because of their limited resources as rural communities, they may be strained by having to service locations further out from town.

Please let me know if I can provide additional information or answer any questions. Thank you for the opportunity to provide comments.

Respectfully,



Melanie Sturm
Forests & Wildlife Director