



July 13, 2022

Re: Draft Recommendation Package for the Moosehead Region Planning Process

Dear Stacy,

On behalf of the Natural Resources Council of Maine, I am writing to provide comments on the draft recommendation package for the Moosehead Region Planning Process. Thank you for your work to craft a proposal aimed at responding to the interests of the residents and businesses in the area and preserving the important qualities of the Moosehead Lake region. Overall, we are pleased with the proposal and believe the substantial changes being proposed will effectively meet the LUPC's charge of balancing conservation with development. We are particularly encouraged that 10 minor civil divisions and areas around several management class 3 lakes are proposed to be removed from the primary and secondary locations. We strongly support these proposed changes to the adjacency rule, especially for Lily Bay Township. As for the proposed development zones, we believe they are appropriately located and will complement existing uses of these areas. However, there are still some improvements we would recommend.

First, we understand the specifications of each proposed development zone have yet to be determined. When considering Location I, we recommend that the LUPC limit its size and scope of allowable development. We would have serious concerns about wildlife and water quality impacts if dense or sprawling housing or hundreds of new residences were permitted in this location. Such a scenario would be inconsistent with the desire of the majority of the public who commented during this planning process that they would like to see development concentrated near existing service centers. To accommodate housing for visitors to the new Big Moose Mountain resort and workforce housing, there will be on-mountain lodging options, new residential development opportunities at nearby Harford's Point, and Rockwood and Greenville, which are a short drive away. There is not a need for housing that's large in scale or in scope at Location I, and we believe that proposed development zone should only cover a portion of the 500 acres in order to avoid negative environmental impacts and drawing mountain-goers away from businesses and services in Rockwood and Greenville.

Second, we recommend that you take another look at former development zones that are important fish and wildlife habitat. Lily Bay Township, Brassua Peninsula, the west side of Big Moose Township, and Indian Pond collectively have been identified by the Maine Department of Inland Fisheries and Wildlife as habitat for federally threatened Canada lynx,<sup>1</sup> Bicknell's Thrush (a state species of greatest conservation need),<sup>2</sup> Rusty Blackbird (a state species of greatest conservation need),<sup>3</sup> inland wading bird

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<sup>1</sup> U.S. Fish and Wildlife Service-Canada Lynx, <https://ecos.fws.gov/ecp/species/3652>

<sup>2</sup> Maine Inland Fisheries and Wildlife-Bicknell's Thrush, [https://www.maine.gov/ifw/wildlife/reports/pdfs/SGCN\\_Reports/SGCN/Bicknell's%20Thrush\\_Catharus%20bicknelli.pdf](https://www.maine.gov/ifw/wildlife/reports/pdfs/SGCN_Reports/SGCN/Bicknell's%20Thrush_Catharus%20bicknelli.pdf)

<sup>3</sup> Maine Inland Fisheries and Wildlife-Rusty Blackbird, [https://www.maine.gov/ifw/wildlife/reports/pdfs/SGCN\\_Reports/SGCN/Rusty%20Blackbird\\_Euphagus%20carolinus.pdf](https://www.maine.gov/ifw/wildlife/reports/pdfs/SGCN_Reports/SGCN/Rusty%20Blackbird_Euphagus%20carolinus.pdf)

and waterfowl,<sup>4</sup> and wild brook trout.<sup>5</sup> These areas deserve additional protection as fish and wildlife habitat, and the P-FW subdistrict may be an appropriate application.<sup>6</sup> After a comprehensive multi-state analysis, The Nature Conservancy created a virtual map and identified areas with biodiversity value based on rare species, intact habitat, or exemplary natural communities, and results show Big Moose Township, Indian Stream Township, and parts of Chase Stream and Sapling Townships are part of an ecoregion with high biodiversity value.<sup>7</sup> Dozens of Maine species face the threat of extinction, and habitat loss and degradation are the leading causes of population declines that are fueling a global extinction crisis. We recommend designating protection zoning in these former development zones to protect iconic and at-risk Maine species.

Thank you for the time and attention you have devoted to listening to residents of the Moosehead Lake region and those who cherish this part of Maine. We are pleased with the direction of this proposal and look forward to continuing to engage in the process as it moves forward.

Sincerely,

A handwritten signature in black ink that reads "Melanie Sturm". The signature is written in a cursive, flowing style.

Melanie Sturm  
Forests & Wildlife Director

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<sup>4</sup> Beginning With Habitat, <https://webapps2.cgis-solutions.com/beginningwithhabitat/mapviewer/>

<sup>5</sup> Maine's Heritage Fish Waters list, <https://www.maine.gov/ifw/fish-wildlife/fisheries/wild-brook-trout.html>

<sup>6</sup> LUPC's Fish and Wildlife Protection Subdistrict, [https://www.maine.gov/dacf/lupc/laws\\_rules/rule\\_chapters/Ch10\\_SubchapterII.pdf](https://www.maine.gov/dacf/lupc/laws_rules/rule_chapters/Ch10_SubchapterII.pdf) (page 127)

<sup>7</sup> The Nature Conservancy-Resilient Land Mapping Tool, <https://maps.tnc.org/resilientland/>