

STATE OF MAINE

LAND USE REGULATION COMMISSION

**BOWERS WIND PROJECT
CHAMPLAIN WIND LLC, DEVELOPMENT PERMIT DP 4889
CARROLL PLANTATION, PENOBSCOT COUNTY
KOSSUTH TOWNSHIP, WASHINGTON COUNTY**

**PARTNERSHIP FOR THE PRESERVATION OF
THE DOWNEAST LAKES WATERSHED**

WITNESS TESTIMONY – GARY CAMPBELL

INTRODUCTION

My name is Gary Campbell. I'm testifying at the request of the Partnership for the Preservation of the Downeast Lakes Watershed (PPDLW). I have an MBA from Harvard Business School. I have started and owned several successful small businesses both in the US and abroad.

I am an avid fly fisherman. My persistent search for an outdoor experience free of concrete and steel first brought me to the Downeast Lakes Region 28 years ago. Finally in 2004 my wife and I bought a camp. Although my legal residency is still in Hingham, MA, my heart and soul now live in a simple log cabin in Lakeville, where I plant myself from May through October.

I would like to make it clear that I do not oppose wind-generated energy in general. Blindly opposing all industrial wind projects would be just as foolish as indiscriminately approving of them all. I have seen the extensive wind facilities in the vast corn fields of the Midwest. Although I have not studied them, I suspect that the significant prairie winds, the lease payments to willing farmers and their location away from scenic destinations combine to make them, if not economically viable, at least well-

sited experiments in which the technology can be evaluated and improved. The Bowers Wind Project, however, is not well-sited. Because of a glitch in the Wind Energy Act, the project is being proposed in a location that will reverse the efforts of hundreds of conservationists and do significant and permanent damage to the Downeast Lakes Region and the people who live and work there.

TOURISM IN THE DOWNEAST LAKES REGION

Mainer Costas Christ is an expert on tourism. He's the Global Tourism Editor of National Geographic's Adventure magazine. In a recent interview with MPBN's *Conversations with Maine*, he said:

“Maine’s brand is its cultural and natural heritage... a unified destination that commits itself to the very thing that is our star attraction, our sense of place, our authenticity, our rural way of life, our connection with nature. These are the attributes that give Maine... the product that the tourism industry is looking for. Sure, we need investment... but not at the price of damaging the Maine brand... Nobody ever said a place was spoiled because it was free of billboards, or because the people were still living a traditional way of life, or because it still had its authenticity and its cultural heritage. We have that in Maine... and we’ve got to hang on to it. We’ve GOT to hang on to it... What we have here, basically is money in the bank. Our nature is money in the bank.”¹

What Maine has is what business strategists call a sustainable and defensible advantage. Any state can put up a waterslide, build a hotel or even erect wind turbines. But no state can build a mature forest around a natural lake full of native salmon with loons calling in the background and eagles soaring overhead.

Tourism is Maine's largest employer. According to the Maine Tourist Office, 140,000 people in Maine are employed in the tourism industry that generates \$13 billion annually in goods and services. ²

In the Downeast Lakes region, tourism employs hundreds of people directly and many more indirectly. Their lives are centered on a watershed that links more than a dozen glacial lakes, rimmed with forested hills and mountains. The local economy represents the perfect balance between forestry and tourism and embraces both. Small businesses include sporting camps, lodges and housekeeping cabins, hunting and fishing guides, as well as retail and service businesses. It seems everyone here has multiple skills and stitches together a living by working multiple jobs. Here wealth is not measured in dollars or board feet. A man's happiness comes from knowing his family is safe and he's doing what he loves.

This is a traditional way of life where the people and the natural environment are interdependent and inseparable. Every small business and every individual, in one way or another depends on the wild character of the region. The population is relatively stable and many of its inhabitants were born and raised here. It has a rich cultural heritage that celebrates the region's Passamaquoddy and Penobscot origins as well as its lumbering heritage and its rich history of providing wilderness experiences.

The 2005 Strategic Plan for Implementing the Maine Nature Tourism Initiative, described it this way:

"Grand Lake Stream... is situated within nearly 2 million unbroken acres of northern woodlands. Visitors to Grand Lake Stream can take a step back in time to experience the traditional Maine sporting camp. Modern conveniences are available such as hot showers, electricity and internet access, if you need to stay connected.

The Registered Maine Guides can lead their visitors on a number of adventures depending on the season. Grand Lake Stream is famous for its Landlocked Salmon fishing as well as Small-mouth Bass fishing. In the fall upland bird hunting is the main attraction with many excellent covers of

Ruffed Grouse and Woodcock. In addition to the traditional sporting camp activities there are a number of other outdoor pursuits that one can enjoy. Bird watching is excellent in the area with migratory songbirds flooding in during the spring. Guides know the locations of area Bald Eagle and Loon nests for those that haven't had the chance to view them up close. Moose watching is popular throughout the summer. There are miles of hiking trails and logging roads to explore.

The newly formed Grand Lake Stream Outdoor School will help attract more people to Grand Lake Stream and the school will help teach them outdoor skills that can be taught in this perfect setting.

The niche that Grand Lake Stream has is the historic lodges and guide service in a remote setting. People go to Grand Lake Stream to get away from their busy hectic lives and enjoy the nature that surrounds them".³

In January of 2005, Professor Pete Borden and Kevin Anderson released their report ECONOMIC OPPORTUNITIES OF THE DOWNEAST LAKES FORESTRY PARTNERSHIP CONSERVATION PROJECT. Here are two excerpts:

"For more than a century, the Downeast Lakes region has been a popular destination for sporting enthusiasts from across the U.S. In Grand Lake Stream, the epicenter of the region's sporting heritage, the first boarding house for anglers opened as early as the 1870s. Even then, marketing efforts were targeted directly at affluent sportsmen from Boston and New York, and brochures for area lodges included train schedules from these cities to Princeton, Maine—the nearest stop on the Washington County railroad. Many of the area's first guides entered the profession after the local tannery closed in 1898."⁴

"The forest products industry, recreation, and tourism have been the principal engines of the Downeast Lakes region's economy for the last century, and the productive forest land base and undeveloped landscape are critical to the viability of these industries. By protecting the resource base on which these industries depend, (we are) investing in a rural economy and a way of life that many residents wish to protect."⁵

In a recent interview with "*Maine Ahead*" Jeff McEvoy, owner of Weatherby's lodge in Grand Lake Stream said:

“I own a sporting camp in Grand Lake Stream, and the quality of the surrounding environment completely defines the success of my business. That’s why people come here.”

THE DOWNEAST LAKES REGION

Nearly an hour’s drive from Interstate 95, the Downeast Lakes region has no major highways and few improved roads. It is encircled by Route 6 to the north, Rte 1 to the east, Rte 9 to the south and Rte 2 to the west. It’s not an area that you would pass through on your way to somewhere else. Nor are you likely to stumble upon it by accident. As such, it is a *destination* tourist area.

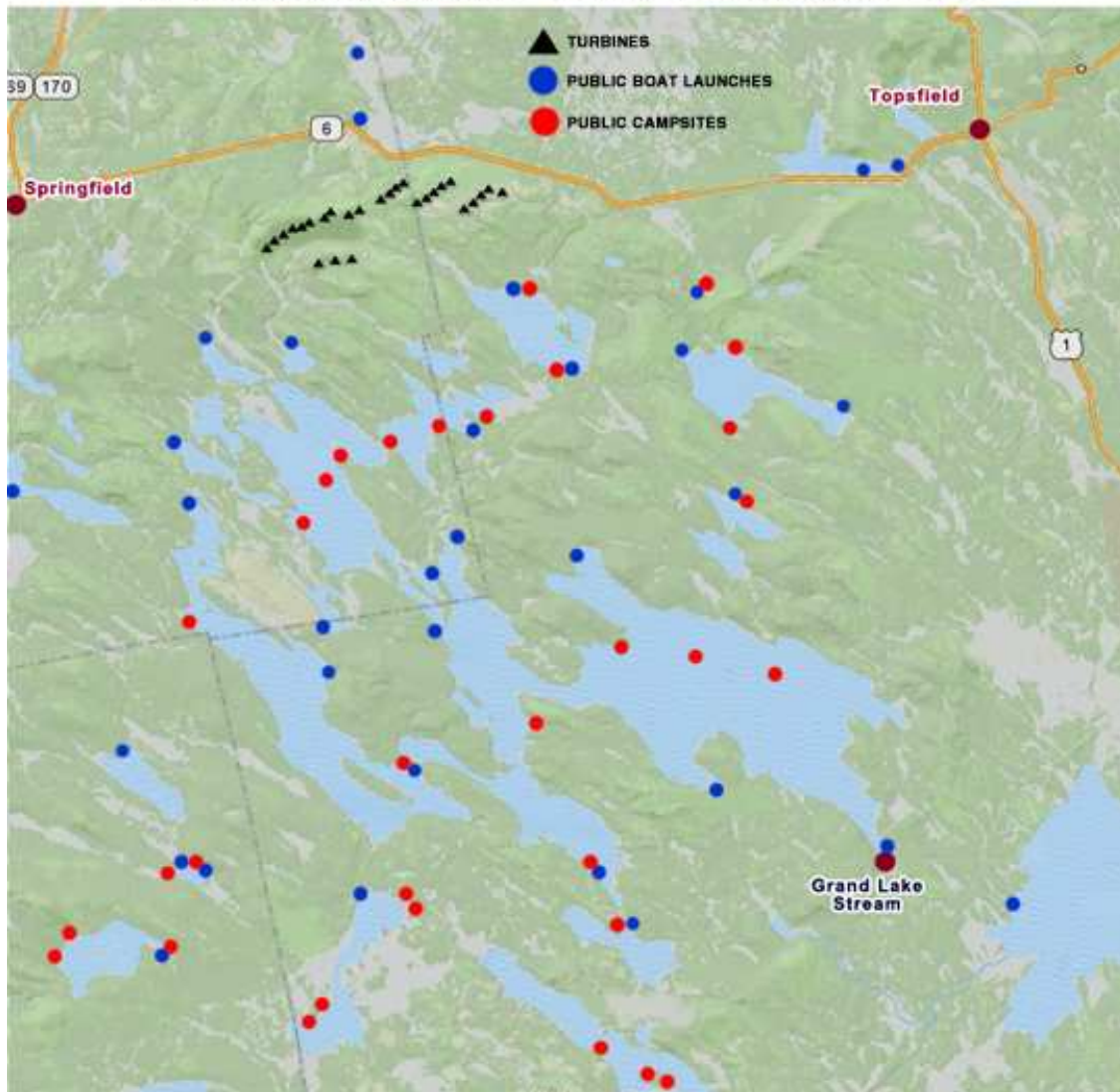
Although the area attracts plenty of day trippers, it cultivates those who can afford to spend several days or even weeks appreciating its special wilderness ‘feel’. These guests return over and over again. Sixty-six percent of the



guests at Grand Lake Stream’s housekeeping cabins stay 5 nights or longer and a remarkable 83% of them are repeat customers⁶. For this reason, the Downeast Lakes region may be Maine’s best-kept secret.

The area’s greatest draw is undoubtedly its network of lakes. Because a paddler can travel for a week or more without portaging, it is a popular destination for those seeking a lengthy wilderness experience. The quality of the lakes is widely recognized and enjoyed by many. The lakes provide 32 public campsites and 33 public boat launch sites.

MAP OF DOWNEAST WATERSHED SHOWING LOCATIONS OF PUBLIC BOAT LAUNCHES AND PUBLIC CAMPSITES



West Grand Lake is recognized by D.I.F.& W. as one of only 5 lakes in the State of Maine where landlocked salmon were native and were not stocked as they were in other salmon lakes in the state. In fact most of the salmon stocked in the State come from the hatchery in Grand Lake Stream. At the upper end of the watershed is another gem. Trout Lake in Kossuth is a mountaintop, spring-fed lake that has never been stocked with fish. Every brook trout caught there is a native. Trout Lake is one of only 176 Management Class 6 remote ponds in the State. This designation means that Trout Lake is afforded special protection to maintain its remote status, natural resource value

and the primitive recreational experience in a remote setting⁷. Consulting the Commission's own Wildlands Lake Assessment, we find that a number of the local lakes have been singled out as being of statewide significance. In fact, this region contains the single largest concentration of Class 1A and 1B lakes in the State.

LAKES OF STATEWIDE SIGNIFICANCE IN THE DOWNEAST LAKES WATERSHED	
Lake	Resource Class
Big Lake	1A
Pleasant Lake	1A
Pocumcus Lake	1A
Sysladobsis Lake	1A
West Grand Lake	1A
West Musquash Lake	1A
Junior Lake	1B
Scraggly Lake	1B
Upper Sysladobsis Lake	1B

CONSERVATION EFFORTS

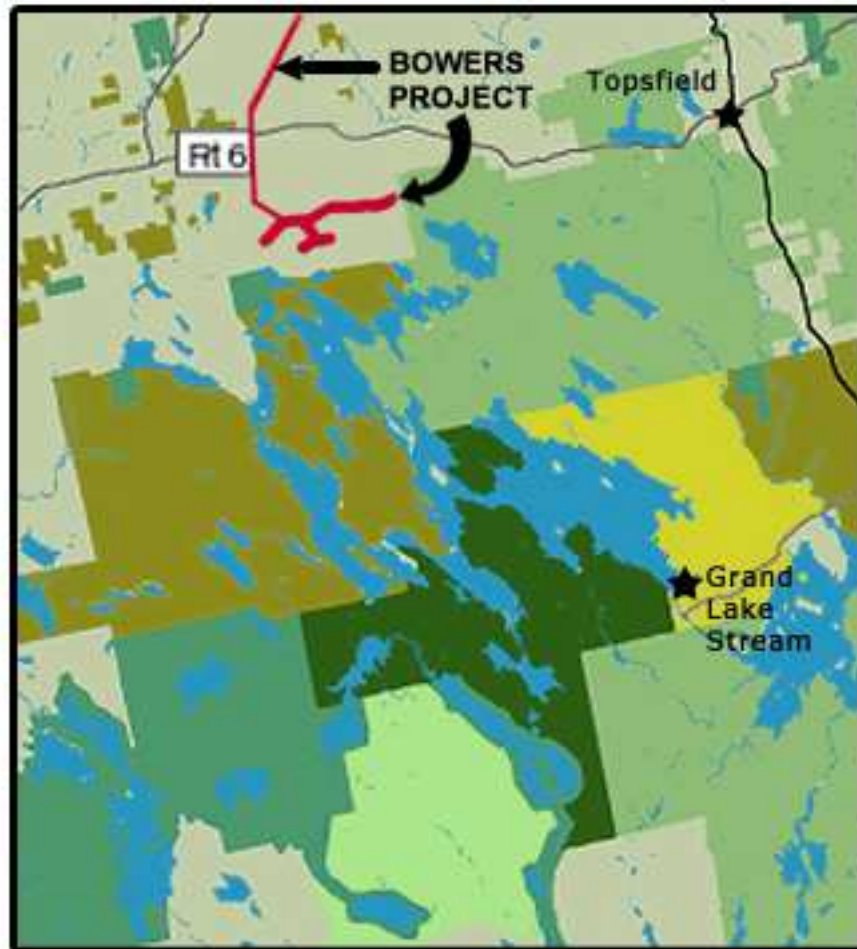
Repeat visitors often remark that the lakes, shorelines and vistas never seem to change. These visitors are generally more affluent and come from a greater distance than the typical Maine tourist. They spend a great deal of money to travel to the region,

they know what they want and demand the best. The moment they feel the Downeast Lakes region no longer delivers the natural wilderness experience they seek, they'll vacation elsewhere. They can just as easily book a vacation in Alaska instead. Guides, sporting camp owners, and retailers have long recognized this and have worked tirelessly to see that it never happens. They have taken control of the destiny of the forests and lakes in the watershed. By conserving the forests, cutting hiking trails, improving access to remote lakes, monitoring water quality and managing campsites they will keep the traditional recreational economy alive for their children and grandchildren.

The Downeast Lakes Land Trust was founded by a small group of concerned citizens and completed its first campaigns successfully due to remarkably strong local support. Few ambitious conservation projects anywhere have as strong a local constituency. Because their work is intimately connected to the wilderness setting, the residents recognize the value of what they have and appreciate the traditional uses of the land.

Over the years, a number of conservation organizations have stepped up to help conserve the area. Some of the parcels represent outright purchases while others are conservation easements. In either case these are working forests in which the latest forestry methods insure that the sense of wilderness, as seen from roads, trails and lakes, will not be compromised. The following map shows the extent of cooperation that has been reached between the Downeast Lakes Land Trust, The Passamaquoddy Tribe, The Penobscot Tribe, Land for Maine's Future, New England Forestry Foundation, The Conservation Fund, The National Fish & Wildlife Foundation, The Nature Conservancy, the Richard King Mellon Foundation, and Wal-Mart's Acres for America.

CONSERVATION LAND IN
THE DOWNEAST LAKES WATERSHED



- West Grand Lake Forest (DLLT)
- Farm Cove Community Forest (DLLT)
- Native American
- Washington Bald Cons. Easement
- Conservation Land (Maine)
- Sunrise Cons. Easement (DLLT)

In 2008, Governor Baldacci joined members of the New England Forestry Foundation and the Downeast Lakes Land Trust to celebrate the completion of a seven-year, \$34.8 million capital campaign to conserve 342,000 acres of forest and hundreds of miles of lakes and streams in Downeast Maine. In his statement, the Governor said:

“This effort was launched by local guides, foresters, lodge owners and residents, building a legacy that will benefit generations to come. The livelihoods, landscapes and legends that define the Grand Lake Stream

region are secured forever with the completion of this project, sustaining the local economy that is dependent on an intact and healthy natural resource base.”⁸

Today, the West Grand Lake Community Forest Project represents an effort to conserve the Downeast Lakes and over 370,000 acres of forests. Despite major funding cutbacks, the project has been ranked as the US Forest Service’s #1 forest funding priority for Fiscal Year 2011. In accepting the 2011 Espy Land Heritage Award, Downeast Lakes Land Trusts Mark Berry said:

“The West Grand Lake Community Forest Project... became the nation’s top forest conservation project because of its extraordinary economic, environmental and recreational values. It will protect Grand Lake Stream’s heritage as a destination for outdoor recreation.”

THE BOWERS WIND PROJECT

The Wind Energy Act took effect in 2008. In laying out the boundary of the Expedited Wind Permitting Area the Governor’s Task Force decided what land is appropriate for expedited wind development and what land is not. The Downeast Lakes region is an island of protection in an otherwise entirely expedited part of the State. One glance at the map of the Expedited Wind area and it becomes obvious that the Task Force made a conscious, proactive move to protect it by leaving it unexpedited. This fact is confirmed in a letter sent to the Commission by Task Force members NRCM, the Appalachian Mountain Club and Maine Audubon. The letter was submitted on October 4, 2010 and commented on the addition of a portion of Kossuth Twp to the Expedited Area. That letter states:

“The proposed area lies at the very northern edge of a large area around the Downeast Lakes... was intentionally excluded from the expedited area because it represents a broadly treasured landscape with significant

conservation values where wind development was not appropriate for any expedited review.”⁹

The Bowers Wind project is proposed for Carroll Plt and Kossuth Twp which lie immediately north of and abut this unexpedited area which roughly coincides with the Downeast Lakes Region. In fact, turbines #23 and #27 will be within 850 feet of unexpedited land. Given the topography and population pattern of the area, the greatest visual impact of this project will be to the south of Carroll and Kossuth deep into the unexpedited Downeast Lakes Region.

Historically, the State has always regarded the Downeast Lakes Region as a cohesive whole. With its many interconnected lakes, largely unbroken forest, cohesive cultural heritage, it is in many ways a self-contained economy. The vast majority of visitors and residents enter the region from the north via Bottle Lake Road or from the south via the region’s unofficial capital, Grand Lake Stream Plt.

Even though turbines and turbine lights will be visible in Grand Lake Stream 17 miles away, the Wind Act prevents the Commission from considering scenic impact more than 8 miles from the project. What we need to take into account is that while many of the Downeast Lakes visitors may *sleep* 17 miles from the project, they spend their days fishing and hunting all over the region. A sport would be very disappointed to spend good money on a guide only to be taken fishing a mile from his camp! Good guides are expert at reading and interviewing their sports. They know that the key to their success is to get a sport’s loyalty by knowing the perfect spot in any and all conditions. It is not unusual for a guide in Grand Lake Stream to trailer his boat and his sport all the way to Baskahegan Lake for a morning’s smallmouth fishing, troll Junior Lake during the midday, and cast poppers in the coves of Scraggly Lake in the evening.

It's easy to see how this project, if built, will have serious economic and social impacts well beyond that arbitrary 8-mile radius. Its impact is certain to be felt by every guide and sporting camp owner throughout the Downeast Lakes region. Further evidence of this is provided by the fact that the Co-Chair of this Commission, Steve Schaefer, a resident and business owner in Grand Lake Stream, 17 miles from the project site, felt he had to recuse himself from the Bowers Wind decision.

TURBINES AND TOURISM

The wind industry wants us to believe that their wind projects will not damage tourism, and may in fact increase it. As part of this project application, the applicant included the results of two surveys that they believe shows the public will not react negatively to having 27 turbines on Bowers Mountain and Dill Hill. The first was a telephone survey¹⁰. However, since the respondent set was not random and they were not shown photo simulations to which they could react, this survey is not valid. The second survey involved interviewing snowmobilers who attended a First Wind hosted free barbecue¹¹. This respondent set is certainly not random and obviously not objective.

I recently dropped into the Maine Tourism Association's Visitor Information Center on Rte 1 Yarmouth. I looked through all the brochures on display and as would be expected many had beautiful photos of mountains and lakes on their covers. None of the mountains had turbines on them. In fact there were no brochures about wind energy at all. I asked the woman at the counter if she had any information about Maine's "wind farms" and whether any of them open for tours. She replied that she had no literature

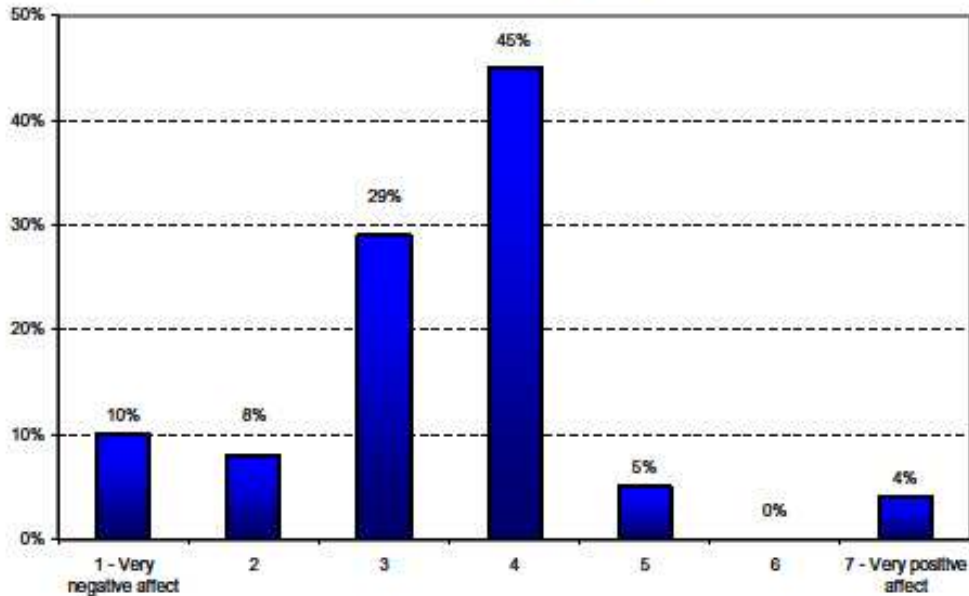
and only knew what she read in the papers. I guess the State of Maine doesn't think that industrial wind complexes will help tourism. In a recent Interview on MPBN's Conversations with Maine, Kent Wommack, former executive director of the Nature Conservancy in Maine said:

“If we lose the thing that makes us a place where people really want to live, we start looking just like New Jersey or Massachusetts. We will have lost not only a quality of life that we value, but we will have lost a very important economic advantage.”

Maybe the best indication of the impact the Bowers project would have on Downeast Lakes tourism comes from a survey conducted in October 2010 by Market Decisions for First Wind's Bull Hill Wind project.¹² In the survey, eighty-one hikers were shown photos taken from various viewpoints followed by photo simulations of the same viewpoints with the project's 19 turbines inserted. Question 20 (see below) was designed to gage the impact the turbines would have on the hikers' enjoyment of the view from Black Mountain looking north. On a scale of 1-7, 7 is a very positive effect, 1 is a very negative effect. Forty-seven percent (10+8+29) of the respondents said the presence of turbines would have a negative effect.

Q20: Now I'd like you to think about how your enjoyment of coming here today would be affected by a change in the current views looking north from the east peak of Black Mountain compared to those with the proposed wind project. On a scale of 1 to 7, where 7 is a very positive affect and 1 is a very negative affect on your enjoyment, how would your enjoyment be affected? A "4" means that it would not change your enjoyment at all.

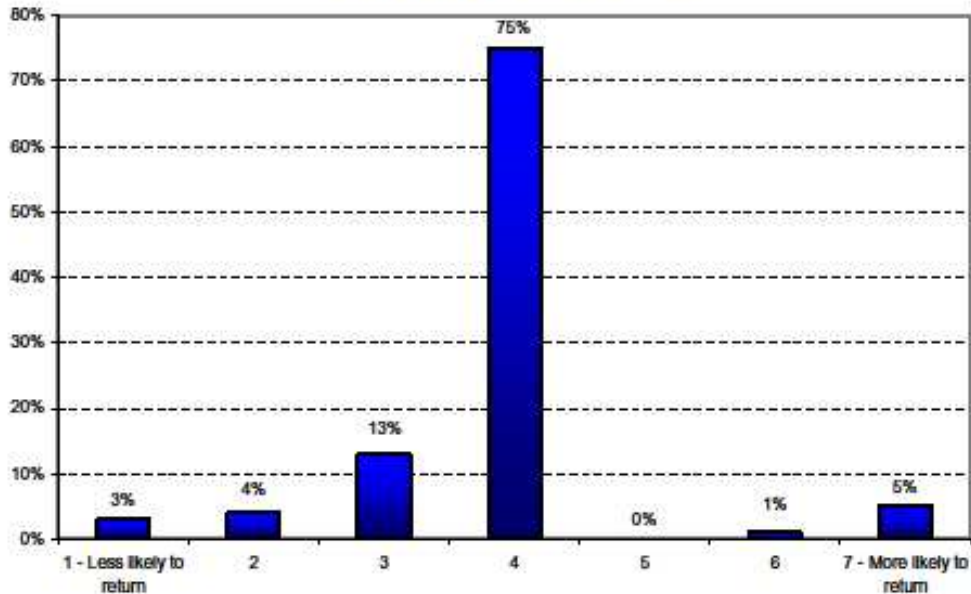
Q20: How enjoyment of coming here would be affected by a change in current views looking north from the east peak of Black Mountain compared to those with the proposed wind project. Scale of 1-7, 7 is a very positive affect, 1 is a very negative affect.



Question 22 (see below) was designed to gauge the impact the turbines would have on the hikers' likelihood of returning to Donnell Pond. Again, on a scale of 1-7, 7 is more likely to return, 1 is less likely to return. Twenty percent (3+4+13) of the respondents said they would be less likely to return if the turbines were present. Only 6% said they would be more likely to return, suggesting a net loss of 14% (20-6) of the visitors.

Q22: Please think about how a change from the current view of Bull Hill to the one in the images of the proposed wind project would affect your likelihood of returning to the Donnell Pond Unit. On a scale of 1 to 7, where 7 means you are more likely to return and 1 means you are less likely to return, how likely are you to return to the Donnell Pond Unit given the change in the view? A "4" means the change in the view would have no effect on your return.

Q22: How a change from the current view of Bull Hill to the one in the Images of the proposed wind project would affect your likelihood of returning to the Donnell Pond Unit. Scale of 1-7, 7 = more likely to return, 1 = less likely to return.



Given the fact that visitors to the Downeast Lakes region make a substantial commitment of time and money to visit the area and that their purpose is to escape the vistas of urban life, it's safe to say that the negative impact of 27 turbines on Bowers Mt. would be even greater than the impact of 19 turbines on Bull Hill. Calculating the exact impact is not important. The question we need to ask is "Could the Downeast Guides, Sporting Camps, Lodges, General Stores, etc. survive with 38% of their customers disappointed and 14% not returning?" The answer is a resounding NO! In our current economy I wonder if ANY business could survive that kind of hit. The effect would be devastating for the region. Some sporting camps would surely close. There would be layoffs of support and service staff. Guides and their families would be forced to move

out of the area. The developer likes to talk about all the Tangible Benefits. Isn't it about time we acknowledged the Tangible Damages?

LURC STANDARDS

At the Commission's regular monthly meeting on March 2, 2011, Commissioner of the Department of Conservation, Bill Beardsley addressed the LURC Commissioners. Among other things he addressed the Commission's responsibility to apply LURC standards when evaluating wind energy projects. He emphasized that the Commission has every right to deny a permit when the project does not meet those standards.

Here's a partial transcript (emphasis mine):

"...the classic example is the expedited wind process where there was a subject, there were stimuli, there's a crisis in the Middle East, there's all of those, you know you need to get off carbon, there are all of those factors crept in there, and if one goes through another six years to modify the CLUP to accommodate wind... it would take a long time. The important factor to me is that your board, you all can say 'no'. There is nothing about the expedited process that says it's easier to get a 'yes'. It's clearer, it's faster, you know where you will have some legitimacy, but you've still got to meet LURC standards."

LURC's 2010 Comprehensive Land Use Plan lays out a number of factors that must be taken into consideration. Here are a few:

2010 Comprehensive Land Use Plan
5.9 Recreational Resources, page 244

"As exceptional as the jurisdiction's natural resources are, it is the jurisdiction's distance from population centers, sense of remoteness and relative lack of development that sets it apart. There is something special

about hunting, snowmobiling, fishing, hiking or camping surrounded by over 10 million acres of largely undeveloped forestland. For many users, these remote, undeveloped qualities not only enhance, but essentially define, their recreational experience, distinguishing it from excursions in more populous areas. As recreational lands elsewhere are increasingly developed, opportunities for backcountry experiences will become scarcer, and the remote values of the jurisdiction will become even more highly prized.

Recreation in the jurisdiction is important to the economic well-being of the communities within and near the jurisdiction as well as to the state as a whole.”

2010 Comprehensive Land Use Plan

5.9 B Recreational Activities and Facilities, page 250 - 251

“Hiking, mountain climbing, mountain biking, backpacking, primitive camping, ski touring, snowshoeing, canoeing and kayaking generally depend on the availability of trails or accessibility to backcountry areas or water resources. A major aim of most of these activities is to “get away from it all” and to recreate in a remote setting. These activities are therefore very sensitive to intrusions by development.

Hunting, fishing and trapping are recreation pursuits that have a rich tradition in the Maine Woods. These activities depend on the maintenance of high-value wildlife resources and the habitats that support them. The abundance and diversity of wildlife in the jurisdiction makes for exceptional hunting and fishing, but users are also attracted by the opportunity to engage in these activities amidst a remote setting.”

2010 Comprehensive Land Use Plan

CLUP 5.9.C Historic Trends & Future Demand, page 256

“In recent years, a variety of tourism market studies have documented the traveling public’s increasing desire for experiences that allow them to learn first-hand the lifestyle, culture and history of rural areas. According to the Travel Industry Association of America (“TIA”), 48% of U.S. travelers are interested in visiting a place that is “remote and untouched.”

“Sporting camp owners benefit significantly from the natural resource and remoteness values in their immediate vicinity. Maintenance of relatively pristine surroundings and the feeling of remoteness is essential to most of the camps in attracting and maintaining clientele...

As a result of these and other factors, the number of operating sporting camps within the jurisdiction has dwindled over the past 50 years to the point where today fewer than 40 traditional camps operate. Considering their cultural value and compatibility with remote recreational settings, a basic question is whether the Commission’s policies and regulations are adequately supportive and protective of these facilities.

The Commission has at its disposal a number of mechanisms that can help protect sporting camps. Recognizing a sporting camp’s dependence on its remote setting and the sensitivity of many sporting camps to intrusions from other intensive uses, the Commission maintains that isolated patterns of development in remote locations, such as sporting camps, should not be used as the basis for rezoning adjacent lands for development. Likewise, the Commission will evaluate not just rezoning petitions but any development proposals within the immediate vicinity of any existing sporting camps with particular care in order to ensure that the recreational and cultural values that sporting camps offer are protected from incompatible land uses.”

CONCLUSION

The Commission is charged with protecting the traditional uses of its jurisdiction, particularly the businesses that employ people in the recreational economy. The Bowers Wind Project would significantly compromise views from a number of scenic resources of state significance such that the development has an unreasonable adverse effect on the scenic character and existing uses related to scenic character of the scenic resource of state or national significance. In turn the project would cause undue harm

and permanent, irreparable damage to the local economy and a traditional way of life. I therefore urge the Commission to deny this permit.

“One hundred years from now, I’m convinced, our great grand children will look back and say to us ‘Thank you for protecting the (Maine) brand. Thank you for protecting the Maine way of life, Thank you for protecting nature and wildlife and our cultural heritage because we are making our livelihood from it today.”¹³

Footnotes

¹ Interview may be seen at:
<http://www.mpbnet.net/Television/LocalTelevisionPrograms/ConversationswithMaine/tabid/876/ctl/ViewItem/mid/3743/ItemId/10394/Default.aspx>

² Letter from Patricia Eltman, Director of the Maine Office of Tourism. Letter is available at:
www.maineconference.com/sponsorship.php

³ The 2005 Strategic Plan for Implementing the Maine Nature Tourism Initiative, page 15, available at:
www.ppdw.org/0926_final_report.pdf

⁴ ECONOMIC OPPORTUNITIES OF THE DOWNEAST LAKES FORESTRY PARTNERSHIP CONSERVATION PROJECT, A Report to the Board of Directors of the Downeast Lakes Land Trust, New England Forestry Foundation, Project Area Businesses, and Local, County, and State Governmental Agencies by Pete (Neil) Borden and Kevin Patrick Anderson, January 2005. p10. Report may be downloaded at: www.ppdw.org/borden_report.pdf

⁵ Borden, *ibid.*, page V)

⁶ Borden, *ibid.*, page 16

⁷ Comprehensive Land Use Plan, 2010; Appendix C: The Commission's Lake Management Program, Page C-26

⁸ <http://www.maine.gov/tools/whatsnew/index.php?topic=Gov+News&id=56139&v=article2011>

⁹ Letter from NRCM, AMC & MA may be downloaded at www.ppdw.org/nrcm_ltr.doc

¹⁰ Land Use Regulation Commission Application, Bull Hill Wind Project, Development Permit DP 4886, T16 MD, Hancock County, Exhibit 18, Appendix D.

¹¹ See applicant's supplemental filing Exhibit C User Survey Reports.

¹² Bull Hill Wind Power Project Intercepts, Market Decisions, Oct 2010.

¹³ Interview with Costas Christ. See footnote 1.

Gary Campbell, Lakeville, Maine

Date: _____