



# WOLFDEN

September 01, 2021

VIA Email

Stacie R. Beyer  
Planning Manager  
Land Use Planning Commission  
22 State House Station,  
Augusta, Maine 04333-0022

**Re: Update to Petition to Rezone Portion of Township 6, Range 6 Penobscot County, Maine for Development of an Underground Metallic Mineral Deposit/ZP 779**

Dear Ms. Beyer:

Wolfden is pleased to submit a revised version of the previously submitted Petition to rezone a portion of its 7,145 acre property in Township 6, Range 6 of Penobscot County, Maine for the development of an underground metallic mineral mine in response to your letter dated February 4, 2021. As suggested by LUPC staff, the updated Petition not only includes a significant amount of additional study work and information, the document has been reorganized consistent with the attached table.

Although this required significantly more time than we envisioned, we believe that the new organization more effectively sequences the flow of the large amount of technical information for all readers. In addition to the attached table that describes the reorganization, we have provided a comparison to the June 30, 2020 Revised Petition. The comparison may be somewhat difficult for many to follow due to the substantial reorganization, which is exhibited as a combination of tracked changes and new information.

The updated Petition reflects additional studies and information, including the following:

- An independent and qualified socioeconomic analysis
- Updated and detailed tailings descriptions and considerations
- Updated soils analysis related to tailings and water management
- A complete site alternatives analysis
- Updated water treatment and water management information
- Updated traffic and roadway analysis
- Discussion and commitments by Wolfden on specific wildlife species of concern
- Updates and edits to all other Exhibits to ensure completeness and consistency through the document

Given that this project is designed to be the most environmentally responsible and most modern of polymetallic mineral mine designs in the USA and must comply with the toughest mining regulations in the country, Wolfden appreciates the feedback from LUPC and other state agency staff, as well as comments submitted by the public. We hope that this updated Petition is responsive to topics that have been raised and we look forward to proceeding with the rezoning process.

Sincerely,



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Ronald Little, President  
WOLFDEN MT. CHASE LLC

**Wolfden Mt Chase LLC-Pickett Mountain Petition Reorganization**

<b>Sept 1 Petition - Exhibit #</b>		<b>June 6/2020 Petition - Sections Included</b>									
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Exhibit 1	Directions and Locations	3									
Exhibit 2	Project Description	4	5	17	21	Exhibit D-2	Appendix A	Attachment A	Attachment D	Attachment P	Attachment Q
Exhibit 3	Deed, Lease, Sales Contract, or Easement	Exhibit B	Attachment B								
Exhibit 4	Notice of Filing	Exhibit F	Attachment C								
Exhibit 5	Land Division History	Exhibit A									
Exhibit 6	Structures, Features and Uses	6	7	8	Attachment F	Attachment H	Exhibit D-1				
Exhibit 7	Site Plans	Attachment E									
Exhibit 8	Site Photographs	Exhibit C									
Exhibit 9	Consistency with the CLUP	15									
Exhibit 10	Surrounding Uses and Anticipated Impacts	13	14	17	Attachment I	Attachment M	Appendix A	Exhibit K	Attachment N	Attachment J	
Exhibit 11	Rezoning to/from Protection Subdistrict	Exhibit G									
Exhibit 12	Corporate Good Standing	Exhibit I									
Exhibit 13	Financial Capacity	Exhibit H									
Exhibit 14	Locations Requirements	NA									
Exhibit 15	Harmonious Fit and Natural Character	17	19	Attachment L	Appendix A						
Exhibit 16	Fire, Police, and Ambulance	11	Exhibit L	Appendix A	Attachment O						
Exhibit 17	Educational Services	Exhibit L	Appendix A	Attachment O							
Exhibit 18	Solid Waste Disposal	Exhibit L	Appendix A	Attachment O							
Exhibit 19	Electricity and Communications	Exhibit L	Appendix A	Attachment O							
Exhibit 20	Public Roads	Exhibit L	Appendix A	Attachment O							
Exhibit 21	Site Access/Legal Right of Access	12									
Exhibit 22	Soil Suitability	Exhibit J	Attachment G								
Exhibit 23	Sewage Water Disposal	Exhibit K									
Exhibit 24	Archaeological and Historic Resources	18	Exhibit M	Appendix A							
Exhibit 25	Rare or Special Plant Communities and Wildlife Habitat	18	Exhibit N	Attachment K	Appendix A						
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**Wolfden Mt Chase LLC-Pickett Mountain Petition Reorganization**

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1B	Agent Information
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6	Site Conditions
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12	Access to Site
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16	Shoreland Development
17	Subdivision or Development Zoning Proposal
18	Natural and Historical Features
19	Recreational Resources
20	Prospectively Zoned Areas
21	Planned Development or Planned Recreation Facility Development Subdistricts
22	Additional Information
23	Required Fees, Exhibits and Supplements
Exhibit A	Location Map and Digital Location Data
Exhibit B	Deed, Lease or Easement
Exhibit C	Site Photographs
Exhibit D-1	Existing Site Plan
Exhibit D-2	Preliminary Site Plan or Subdivision Plan
Exhibit E	Flood Area Zoning
Exhibit F	Notice of Filing
Exhibit G	Protection Subdistricts
Exhibit H	Financial Capacity
Exhibit I	Corporate Good Standing
Exhibit J	Soil Suitability and Mapping
Exhibit K	Wastewater Disposal
Exhibit L	Impacts on Public Services
Exhibit M	Archaeological Resources
Exhibit N	Rare or Special Plant Communities and Wildlife Habitat
Appendix A	Chapter 12 Requirements for Mining and Level C Mineral Exploration Activities
Attachment A	A narrative description of the nature and basis for the subdistrict change being requested
Attachment B	A legal description and delineation of the property boundaries proposed for redistricting, including names, addresses and affiliations of current owners and any other entities having a legal interest in the property
Attachment C	Names and address of property owners located within 1,000 feet of the subject property
Attachment D	A preliminary plan for general location and timing of the elements of the Pickett Mountain Mine Project
Attachment E	A location map drawn to scale on the most recent version of the USGS Topographic map and a LUPC Land Use Guidance Map that indicates the area for which a D-PD Development Subdistrict designation is sought and the estimated boundaries of the ore body proposed to be explored or mined
Attachment F	A map drawn to scale of at least 1 inch to 100 feet showing existing site conditions, including contours at 10 foot intervals or less, water courses, unique or unusual natural conditions, forest cover, wetlands, known or likely deer wintering areas, lakes, ponds, existing structures, road and transportation routes, property boundaries and names of adjoining property owners, scenic locations and other prominent topographical and natural resource features.
Attachment G	A soils map of low intensity that encompasses those portions of the property proposed for D- PD Development Subdistrict designation, including identification of soils used in the USDA Soil Series.
Attachment H	Surficial and bedrock geology maps at a scale of 1:24,000, or largest scale available, of the property proposed for D-PD Development Subdistrict designation
Attachment I	A map and or description of the location of public, private and industrial water supplies as well as mapped aquifers located within a three-mile radius of the mining area or exploration site.
Attachment J	A map and description of the location and extent of existing infrastructure to include roadways and transportation routes to be utilized, potential impacts on this existing infrastructure, as well as infrastructure to be constructed or improved.
Attachment K	A map identifying significant natural resources and sensitive natural areas located within a three-mile radius of the mining area or exploration site including protected water bodies, significant wildlife and plant areas, fragile mountain areas, historic sites, scenic resources, public lands, registered critical areas, and LUPC subdistricts.
Attachment L	A map and description of existing uses, such as recreational, within a three-mile radius of the mining area or exploration site.
Attachment M	A description of general measures that may be undertaken to assure that mining in the specified location will not have undue adverse impacts on existing uses, resources and measures that a permittee may take to avoid, minimize or mitigate any adverse impacts;
Attachment N	A description of socioeconomic impacts, both positive and negative, of the proposed metallic mineral mining or level C mineral exploration activities upon the immediate area and communities within and adjacent to the LUPC's jurisdiction likely to be affected by the proposed activities, as well as to the county and state.
Attachment O	An evaluation of the sufficiency of existing services and utilities, a description of any general measures necessary to increase those service capacities and an examination of the burdens on communities or government to provide those services.
Attachment P	An explanation of how this proposal is consistent with the standards and purpose of the D-PD Development Subdistrict.
Attachment Q	A description of the anticipated site conditions following closure and the potential for future reclamation and beneficial use of the affected area
Attachment R	Proposed Land Use Activities and Structure Allowed in the Picket Mountain (D-PD) Planned Development Subdistrict