



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
LAND USE PLANNING COMMISSION
22 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0022

AMANDA E. BEAL
COMMISSIONER
STACIE R. BEYER
EXECUTIVE DIRECTOR

Memorandum

To: LUPC Commissioners

CC: Stacie R. Beyer, Executive Director

From: Stacy Benjamin, Chief Planner

Date: April 28, 2023

Re: Amendment F to ZP 532: Staff-initiated petition to rezone lands encompassed by *A Concept Plan for the Lands of Lowell & Co. Timber Associates in Attean Township and Dennistown Plantation* (P-RP 007)

A Concept Plan for the Lands of Lowell & Co. Timber Associates in Attean Township and Dennistown Plantation (Concept Plan) and its associated Resource Plan Protection subdistrict (P-RP) will expire on July 1, 2023. When a concept plan expires, the Commission must initiate a rezoning process to replace the former plan area with zoning that provides comparable protection for existing resources. Staff prepared draft replacement zoning for the subject P-RP subdistrict and presented the maps at the March 8, 2023, Commission meeting. At that meeting, the Commission directed staff to post the draft replacement zoning to a 30-day public comment period.

Several comments on the proposed rezoning were received during the comment period and have resulted in minor changes to the draft zoning map for Attean Township. Revised draft replacement zoning maps are now ready for consideration by the Commission for a decision on adoption. The proposed zoning as revised is described in detail in the attached draft decision document (Attachment A) and shown on the attached draft land use guidance maps (Attachment B).

REPLACEMENT ZONING PROCESS

When a Resource Protection Plan and associated P-RP subdistrict expires, the Commission is tasked with rezoning the area previously covered by the P-RP subdistrict. The process is outlined in Chapter 10, Section 10.23(H)(8):

“The provisions of an approved and recorded Resource Plan shall apply for the duration of the approved time period, except that any conservation measures taken to strike a reasonable

and publicly beneficial balance in a lake concept plan shall continue to apply to the extent that they are covered by legal contract, deeded covenants, permit requirements, or other legal instruments. ...At the termination of a plan, the Commission will, in conformity with its comprehensive plan, statutes, and standards, designate appropriate zoning which is reasonably consistent with zoning in accordance with Section 10.08,A.

In the event that a plan is terminated, all transactions initiated as a component of the plan, including without limitation, the granting of conservation easements or restrictive covenants on subdivided lands will continue to apply to the extent that they are covered by legal contract, deeded covenants, permit or other legal requirements.”

Under the provisions of Section 10.23(H)(8), staff has identified appropriate replacement zoning for the Concept Plan area based on the scenic, recreational, and natural resources present, property owner input and unique site characteristics, and the limited areas of development that were approved under the Concept Plan and subsequent permitting.

PRE-POSTING LANDOWNER AND AGENCY REVIEW

To initiate the rezoning process, draft proposed zoning maps were sent for informal review to Carrier Timberlands LLC in January of 2023, and to all other landowners within the Concept Plan area in February of 2023. Initial drafts of the zoning maps were also sent to the Bureau of Parks and Lands (BPL), the Maine Forest Service (MFS), the Maine Historic Preservation Commission (MHPC), the Maine Department of Inland Fisheries & Wildlife (MDIFW), and the Maine Natural Areas Program (MNAP) for review in early February. Staff discussed the proposed zoning with representatives from the Forest Society of Maine and Chewonki Foundation, both organizations with property interests in the Concept Plan area. Staff also discussed zoning options with a representative of Hog Island, LLC, the owner of Hog Island, and answered questions from one other owner. No other comments were received during this preliminary informal review.

PUBLIC NOTICE AND COMMENT PERIOD

On March 9, 2023, Commission staff filed the application for the zoning changes and provided notice of filing of the application to all persons owning or leasing land within 1,000 feet of the P-RP boundary, the Somerset County Commissioners, and Passamaquoddy Tribal leaders. The petition materials and public notice were made available the same day on the Commission’s website and electronic permit report. Resource agencies were also notified via email or paper mail of the petition filing and public comment period. An electronic GovDelivery notice was sent to the Commission’s Somerset County and LUPC News and Information subscription lists on March 10, 2023.

The public comment period opened on March 13, 2023 and closed on April 14, 2023. During the comment period, staff worked with representatives of the owners of Hog Island to ensure suitable zoning is proposed for the island given its complex regulatory history under the Concept Plan (*see the Hog Island topic on pages 8-9 of the draft decision document*).

Written comments were received from MNAP, MDIFW, one property owner (a representative of Hog Island, LLC) and one abutter. In addition, LUPC staff submitted comments regarding the correction of an error on the draft zoning map for Attean Township. Copies of all written comments received are included as Attachment C. A summary of comments received, followed by staff responses, are included on pages 7-10 of the attached draft decision document.

REVIEW CRITERIA

The Commission's general criteria for adoption or amendment of land use district boundaries are provided in 12 M.R.S. § 685-A(8-A) of the Commission's statute and restated in Chapter 10 § 10.08(A) of the Commission's Land Use Districts and Standards, 01-672 C.M.R. Ch. 10, last revised March 29, 2022 (Chapter 10). The criteria specify that a land use district boundary may not be adopted or amended unless there is substantial evidence that:

- 1) The proposed land use district is consistent with the standards for district boundaries in effect at the time, the comprehensive land use plan (CLUP) and the purpose, intent and provisions of Chapter 206-A; and
- 2) There is substantial evidence that the proposed land use district has no undue adverse impact on existing uses or resources or a new district designation is more appropriate for the protection and management of existing uses and resources within the affected area.

The attached draft decision document presents the criteria for approval and the land use standards, analysis, and findings that are most relevant to the zoning petition. The staff analysis determined that all the relevant criteria and standards have been met.

STAFF RECOMMENDATION

Staff recommends that the Commission approve Amendment F to Zoning Petition 532, a staff-initiated petition to replace the expiring Resource Plan Protection subdistrict with other appropriate zoning in Attean Township and Dennistown Plantation, Somerset County, Maine.

Attachment A: Draft decision document for Zoning Petition ZP 532-F

Attachment B: Draft land use guidance maps*

Attachment C: Written Comments Received*

* Due to the large file size, this attachment may be posted as a separate file.

ATTACHMENT A.

DRAFT DECISION DOCUMENT

for

ZONING PETITION

ZP 532-F



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
LAND USE PLANNING COMMISSION
22 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0022

AMANDA E. BEAL
COMMISSIONER
STACIE R. BEYER
EXECUTIVE DIRECTOR

DRAFT

**COMMISSION DECISION
IN THE MATTER OF**

Staff, Maine Land Use Planning Commission

Findings of Fact and Decision

AMENDMENT F TO ZONING PETITION ZP 532

The Maine Land Use Planning Commission (Commission), at a meeting of the Commission held May 10, 2023, at Brewer, Maine, after reviewing the draft land use guidance maps, petition, and supporting documents submitted by the staff of the Maine Land Use Planning Commission for Amendment F to Zoning Petition ZP 532, review agency and public comments, and other related materials on file, and pursuant to 12 M.R.S. Sections 681 et seq. and the Commission's standards and rules, finds the following facts:

1. **Applicant:** Staff (Attn: Stacy Benjamin)
Maine Land Use Planning Commission
22 State House Station
Augusta, Maine 04333-0022
2. **Complete for Processing Date:** March 9, 2023
3. **Location of Proposal:** Attean Township and Dennistown Plantation
4. **Current Zoning:** Resource Plan Protection Subdistrict (P-RP)
5. **Proposed Zoning Subdistricts:** *(see attached maps)*
 - Residential Development (D-RS)
 - General Management (M-GN)
 - Accessible Lake Protection (P-AL)
 - Great Pond Protection (P-GP)
 - Recreation Protection (P-RR)
 - Shoreland Protection (P-SL1 and P-SL2)
 - Soils and Geology Protection (P-SG)
 - Wetland Protection (P-WL1, P-WL2 and P-WL3)



6. **Affected Water Bodies:** Attean Pond, Big Wood Pond, Little Big Wood Pond, Mud Pond, Benjamin Pond, Lost Pond, Clearwater Pond, Horseshoe Pond, Long Pond, miscellaneous unnamed ponds, and the Moose River (*see Table 1 below*).

Table 1. Affected Water Bodies

Water Body Name	Location	Mgmt Class	Outstanding Resource Values	Significant Resource Values	Resource Class
Attean Pond	Attean Twp	2	fisheries resources; scenic; shore character; physical resources	n/a	1A
Big Wood Pond	Attean Twp	7	physical resources	fisheries; scenic; shore character; cultural resources	1A
Little Big Wood Pond	Dennistown Plantation	7	physical resources	fisheries; wildlife; scenic; shore character	1A
Mud Pond	Attean Twp	7	n/a	scenic	2
Benjamin Pond	Attean Twp	6	n/a	wildlife; scenic	2
Clearwater Pond	Attean Twp	1 & 6	Cultural	positive comments for scenic and shoreline character	1B
Horseshoe Pond	Attean Twp	6	No or limited data		3
Long Pond	Attean Twp	6	No or limited data		3
Lost Pond	Attean Twp	6	No or limited data		3
Misc Unnamed Ponds	Attean Twp	6	No or limited data		3
Moose River	Attean Twp	Class AA shall be the highest classification and shall be applied to waters which are outstanding natural resources and which should be preserved because of their ecological, social, scenic or recreational importance. (MRS 38, §485)			AA

I. PROJECT DETAILS

7. Administrative History:

- A. Zoning Petition ZP 532: The Commission approved ZP 532, *A Concept Plan for the Lands of Lowell & Co. Timber Associates in Attean Township and Dennistown Plantation* (Concept Plan), in April 1993 as the first concept plan in Commission history. The resulting Resource Protection subdistrict (P-RP) became effective on July 1, 1993 and covers a large portion of

Attean Township and a small area within Dennistown Plantation. The Concept Plan and its associated P-RP subdistrict were approved for a term of 30 years. Lowell and Company Timber Associates was the sole applicant and offered the Concept Plan as “...a model for responsible conservation and development in LURC’s jurisdiction.” According to the introduction:

The Plan offers innovative approaches to development and conservation: structures are set back from the shore in clusters, separated by generous open space; shorefront is held in common; and access is by boat or foot only; further public access for traditional recreation is guaranteed and generous amounts of shorefront and backland is committed to remain undeveloped in perpetuity, all to assure that the wilderness nature of the property is retained.

- 1) *Description of the Concept Plan Area.* The Concept Plan area covers 17,060 acres, mostly in Attean Township with a small portion in Dennistown Plantation. The area is adjacent to the Maine Bureau of Parks and Lands’ Holeb Public Land and includes:
 - 34.9 miles of shoreline on a total of 11 ponds, including Attean, Big Wood, and Little Big Wood ponds
 - Portions of the Moose River, which drains the northern end of the Kennebec River watershed within the Concept Plan area and flows east to Moosehead Lake
 - Attean Mountain, Sally Mountain, and portions of other mountains
 - The Benjamin Valley, a complex and highly valuable remote ecosystem including multiple management class 6 ponds.
 - Multiple areas under conservation easement

- 2) *Development within the Concept Plan Area.* Development components of the Concept Plan are summarized in Table 2 below. One subdivision permit was approved under the Concept Plan, SP 3244, issued to Lowell & Co. Timber Associates in November of 1993. SP 3244 authorized the division of fifteen waterfront residential lots and two non-commercial campground properties, as provided for in the Concept Plan. SP 3244 has been amended three times. Two of the amendments related to timeframe extensions, and one allowed the division of one of the approved lots as envisioned within the Concept Plan.

Table 2. Development Components and Status

Development Components Included in the Concept Plan	2023 Status
Shorefront Cabins: 65 seasonal cabin lots occupying 12,450 feet of shore. All cabin sites will have boat or foot access only; most cabins will be clustered together on small lots with common docks and common shore frontage.	17-lot subdivision approved 11/93 (SP 3244) – 15 camp lots and 2 campgrounds (see below); 7 cabins/dwellings subsequently permitted

Development Components Included in the Concept Plan	2023 Status
One noncommercial campground of no more than 5 acres in size with 500 feet of frontage on Little Big Wood Pond for use by educational groups and the public and being comprised of tent platforms, a storage building and privies.	Lot LB – Now owned by the State of Maine (no development to date)
One private campground of no more than 2 acres, to be designed to accommodate groups of approximately 12 persons within the Mud Pond, Wood Stream, Wood Cove area, owned and operated for the exclusive use of the holder of the conservation easements in the Plan Area (the Chewonki Foundation) for its environmental education purposes and for monitoring the conservation easements.	Lot CH – Owned by Chewonki Foundation (two tent platforms and a pit privy used for programming and staff retreats – DP 4263)
Back-country Buildings: 15 seasonal, remote buildings on 1-acre lots with no motorized wheeled vehicle access and no utilities permitted. These lots are to be limited to certain back-country areas.	No permits identified
There are 7 existing cabins on the ownership, 5 of which are to be offered for sale to the present lessees (one of these will be moved back 100 feet); one cabin will be demolished, and another will be converted into a back-country cabin; further, there are two newly restored log cabin/shelters for public recreational use at Holeb Falls, which will be retained.	4 lots transferred to leaseholders prior to subdivision SP3244; Hog Island transferred in 2002.

- 3) *Permanent Conservation Measures in Place.* Conservation measures outlined in the Concept Plan are summarized in Table 3 below.

Table 3. Conservation Components

Conservation Components Included in the Concept Plan	2023 Status
<p>Transfer of Shore Frontage to the State. On or about July 1, 1993, following approval of this Plan by the Commission, Lowell and Company will transfer, in fee, to the State of Maine acting through the Bureau of Public Lands, title to:</p> <ul style="list-style-type: none"> i. Lowell and Company's entire 11.9 miles of shorefront (excluding two 3-acre cabin sites) on Attean Pond which is subject to an earlier conservation easement. The width of this shoreland is 300 feet or more as defined by the existing conservation easement on Attean Pond. ii. The shoreland and bed of the Moose River east of Holeb Falls (excluding two log cabin sites on the north side) totaling about 8,200 feet on the south side of the river and 7,000 feet on the north side. The width of this shoreland area to be conveyed is 250 feet on each side. 	Transferred 5/17/1994 (State subsequently acquired the two 3-acre cabin sites on Attean Pond)

Conservation Components Included in the Concept Plan	2023 Status
<p>Transfer of Right-of-way to State. In addition, on or about July 1, 1993, Lowell and Company will convey a permanent right-of-way, across the Attean/Holeb portage trail, to the Bureau of Public Lands but will retain a right to cross and recross this trail. The current easement held by the Forest Society of Maine and the Recreation Protection Subdistrict (P-RR) restrictions will continue to apply to this trail.</p>	<p>Transferred 5/17/1994</p>
<p>In Perpetuity Remote Pond Protection. On or about July 1, 1993:</p> <ul style="list-style-type: none"> i. The Benjamin Valley Ecological Preserve, about 330 acres, more or less, between 4 remote ponds, will be permanently protected by conveyance of a conservation easement which prohibits development and timber harvesting. The intent is to create a scientific preserve. ii. By conveyance of a conservation easement, place about 3,400 acres, more or less, of additional land in the Benjamin Valley under permanent restrictions. The restrictions and the area so designated shall coincide with the Recreation Protection Subdistrict (P-RR) shown on the Commission's land use guidance map for this area. iii. Permanent protection by conveyance of a conservation easement to The Chewonki Foundation is proposed for other areas in the Plan Area. This easement will prohibit any development of 31,570 feet of shoreline on Mud, Little Big Wood and Wood ponds. 	<p>5/17/1994 – three easements deeded to the Chewonki Foundation; later transferred to Forest Society of Maine</p>
<p>Deed Restrictions on development. Place deed restrictions on all development so that cabin size, setback and materials are controlled and other measures are taken to minimize environmental impact.</p>	<p>Varying levels of deed restrictions on properties transferred since the Concept Plan was approved. Most cabin lots restricted to seasonal use/water access only. No-build easement 100' deep along the shorefront for most lots.</p>

B. Amendments to Zoning Petition ZP 532: Lowell & Co. Timber Associates was issued ZP 532-A in December of 1993 and ZP 532-B in March of 1994 to provide time extensions to implement certain conservation measures proposed within the Concept Plan. ZP 532-C was issued in January of 1999 to approve changes allowing use of on-site electrical generators. ZP 532-D was issued to the State of Maine in August of 2006 to allow public recreational uses of the two cabin lots approved as part of the Concept Plan on Attean Pond.

C. Current Ownership: Since the approval of the 1993 Concept Plan, the Plan area has changed ownership twice and the current majority landowner is Carrier Timberlands, LLC. Four of the leased lots and thirteen of the subdivision lots approved under SP 3244 have been sold or deeded to other parties (including Hog Island, which was also a lease lot).

- D. Expiration of the Concept Plan: *A Concept Plan for the Lands of Lowell & Co. Timber Associates in Attean Township and Dennistown Plantation* and its associated Resource Plan Protection subdistrict (P-RP) became effective July 1, 1993 and expires on July 1, 2023. Commission Staff contacted the current majority landowner in October of 2022 and was notified at that time that the landowner does not wish to renew the Concept Plan. As provided in Chapter 10, §10.23(H)(8), at the termination of a plan, the Commission will, in conformity with its comprehensive plan, statutes, and standards, designate appropriate zoning which is reasonably consistent with zoning in accordance with Section 10.08(A). Commission staff therefore began the process of identifying appropriate replacement zoning.

Additionally, Chapter 10, §10.23(H)(8) states that in the event that a concept plan is terminated, all transactions initiated as a component of the plan, including without limitation, the granting of conservation easements or restrictive covenants on subdivided lands will continue to apply to the extent that they are covered by legal contract, deeded covenants, permit or other legal requirements.

8. **Proposal:** The Land Use Planning Commission staff seeks to rezone the Resource Plan Protection (P-RP) subdistrict currently applied to the area included in *A Concept Plan for the Lands of Lowell & Co. Timber Associates in Attean Township and Dennistown Plantation*, due to impending expiration of the Plan. Lands within the Concept Plan area are now owned primarily by Carrier Timberlands, LLC, who does not wish to renew the Concept Plan and associated zoning. The permanent conservation easements will remain in place. No new development is proposed. Staff have identified appropriate replacement zoning for the Concept Plan area based on existing development, original zoning, the resources that are present, and input from property owners and resource agencies. The proposed zoning changes are described in detail below.
9. **Site Visits:** Staff visited the vicinity of the project area on October 31, 2022. Due to the remote nature of the property and the development sites, staff were unable to visit any of the cabin or campground sites.

II. RULES OF PRACTICE AND PUBLIC PROCESS

10. Notice Requirements:

- A. Criteria: Notice as required by Chapter 4, §4.04(B)(3)(a)(1) and described in Sections 4.04(B)(3)(a)(2) and (3) of the Commission's *Rules of Practice*, 01-672 C.M.R. Ch. 4, last revised November 01, 2021 (Chapter 4), is required for applications for zone changes, except those proposing to change a development subdistrict designation to a management or protection subdistrict designation, and applications addressing clerical corrections. The Commission staff may provide, or require an applicant to provide, additional notice related to an application in any manner the Commission staff deems appropriate. Chapter 4, §4.04(A)(3)(b).
- B. Analysis: At its March 8, 2023 meeting, the Commission directed staff to post the proposed replacement zoning for a 30-day public comment period. On March 9, 2023, Commission staff provided notice of filing of the application for zone change to all persons owning or

leasing land within 1,000 feet of the P-RP boundary, the Somerset County Commissioners, Passamaquoddy Tribal leaders, the State of Maine Bureau of Parks and Lands, and the Forest Society of Maine. The application for zone change was filed on March 9, 2023 and made available the same day on the Commission's website and electronic permit report. An electronic GovDelivery notice was sent to the Commission's Somerset County and LUPC News and Information subscription lists on March 10, 2023. The public comment period was held from March 14, 2023–April 14, 2023.

- C. Landowner Review: To initiate the rezoning process, draft proposed zoning maps were sent for informal review to Carrier Timberlands LLC in January of 2023, and to all other landowners within the Concept Plan area in February of 2023. Carrier Timberlands LLC requested that Lots LC, LE, and LW in Dennistown Plantation not be zoned D-RS because a conservation easement has been placed on the parcels prohibiting development. Staff discussed the proposed zoning with representatives from the Forest Society of Maine and Chewonki Foundation, organizations with property interests in the Concept Plan area. Staff also discussed zoning options with a representative of Hog Island, LLC, the owner of Hog Island, and answered questions from one other owner. No other comments were received during this preliminary informal review.

Once the formal public comment period began, all landowners were again notified via email or paper mail of the petition filing and public comment period.

- D. Resource Agency Review: Initial drafts of the zoning maps were sent to the Bureau of Parks and Lands (BPL), the Maine Forest Service (MFS), the Maine Historic Preservation Commission (MHPC), the Maine Department of Inland Fisheries & Wildlife (MDIFW), and the Maine Natural Areas Program (MNAP) for review in early February. Staff coordinated with BPL regarding the proposed zoning as they manage State properties within the Concept Plan area. MNAP submitted comments on 2/28/2023 regarding specific wetland subdistrict designations (P-WL1 vs. P-WL2 or 3). Staff were not able to respond to these comments prior to the March 8, 2023 Commission meeting. The MFS and MHPC indicated they had no comments on the draft maps. MDIFW and BPL did not comment on the initial draft maps.

Once the formal public comment period began, the resource agencies noted above were again notified and sent copies of the petition filing with a request for comments. MDIFW submitted comments on April 10, 2023. Their comments, along with the comments submitted February 28, 2023 by MNAP, are summarized and addressed below.

- E. Resource Agency Comments

- 1) *MNAP Comments*: According to MNAP staff, several areas within the vicinity of the Concept Plan area are currently mapped as P-WL2 and P-WL3 but qualify as P-WL1: Wetlands of Special Significance because they are peatlands. MNAP recommended that the National Wetlands Inventory wetlands shown as P-WL2 and P-WL3 that are concurrent with MNAP mapped rare or exemplary peatlands be zoned as P-WL1 within Attean Township as well as within T5 R7 BKP WKR and Bradstreet Township.

The Commission evaluated the information provided by MNAP and agrees that the areas MNAP identified as peatlands within the Concept Plan P-RP boundary should be

redesignated P-WL1. The revised proposed zoning map reflects this change. This staff-initiated rezoning does not include areas outside of the P-RP boundary, so no changes are proposed beyond it at this time.

- 2) *MDIFW Comments:* According to MDIFW, three *Myotis* species of bats are protected under the Maine Endangered Species Act and include the little brown bat (State Endangered), northern long-eared bat (State Endangered), and eastern small-footed bat (State Threatened). Five bat species are listed as Special Concern - Rare: big brown bat, red bat, hoary bat, silver-haired bat, and tri-colored bat. Tri-colored bats are currently proposed for listing as State Threatened. Based on historical evidence, it is likely that several of these species occur within the project area during the fall/spring migration, the summer breeding season, and/or for overwintering. *Myotis* and big brown bats may also overwinter in exposed rocky features, between rocks, cracks, and crevices in talus slopes, rocky outcrops, and cliff faces that occur in the project area.

MDIFW data indicate documented occurrences of wood turtles (Special Concern - Rare) within the project area, along with two documented occurrences of the Quebec emerald dragonfly (Special Concern - Rare). MDIFW also notes there may be unmapped deer wintering areas present. In addition, MDIFW identified thirteen mapped inland wading bird and waterfowl habitats within the project area, with four potential additional areas. MDIFW notes that a comprehensive statewide inventory for significant vernal pools has not been conducted and recommends that surveys for vernal pools be conducted by qualified wetland scientists for future development projects in the project area.

MDIFW also notes two Maine Heritage Fish Waters (brook trout) within the project area. MDIFW generally recommends maintaining 100-foot undisturbed vegetated buffers from the upland edge of all intermittent and perennial streams and any contiguous wetlands.

The Commission appreciates the important information related to wildlife habitats shared by MDIFW. The Commission concurs with the MDIFW conclusion that "...the zoning proposed to be established / reestablished along with related regulatory processes for any future development activities are likely to provide for adequate and appropriate protections for these resources."

- F. Public Comments and Public Hearing: In addition to the agency comments noted above, three written comments were received. One property owner and one abutter commented, and Commission staff submitted a comment regarding a mapping error in the original draft. Three additional property owners within the Concept Plan area and thirteen abutters contacted staff with questions about the rezoning but did not provide comments. The Commission did not receive any requests for a public hearing. A summary of comments and responses is provided below.

- 1) *Topic: Hog Island*

Comments were submitted on behalf of the owners of Hog Island. The comments include background information regarding the island, requested adjustments to the areas proposed to be rezoned D-RS, and statements about future regulatory requirements. According to

the commenter, “The proposed adjustments reflect the families’ long history and use of the island, and their knowledge of the topography and conditions there.”

The comments included a 2005 High Intensity Soil Survey by S.W. Cole Engineering and a map with proposed adjustments to the D-RS subdistrict configurations on the Island. The requested adjustments were based on factors such as proximity to a known eagle’s nest, soil suitability, water access, and visibility from the mainland.

In terms of future regulatory requirements, the commenter noted that areas rezoned to D-RS subdistricts will continue to be subject to SP 3244 and the creation of lots in these areas will require an amendment to SP 3244. The commenter further notes that areas rezoned M-GN and P-GP will not be subject to SP 3244.

Commenter(s): Juliet Browne, Esq.

Response: The D-RS subdistricts originally proposed for Hog Island would accommodate the amount and approximate locations of development consistent with the Concept Plan. These areas were based on the staff’s interpretation of low-resolution mapping included in the Concept Plan when it was adopted in 2003. Hog Island LLC’s comments recommend refinements of the proposed subdistrict boundaries based on soil survey data and local knowledge of the island. The Commission agrees that the proposed re-locations and reconfiguration of the D-RS subdistrict on Hog Island are reasonable and consistent both with the intent of the expiring Concept Plan for development on Hog Island, as well as the Commission’s regulations. Additionally, the Commission agrees with the commenter that, on Hog Island, Subdivision Permit SP 3244 will apply in areas designated as D-RS, and not in areas designated as other subdistricts (e.g., M-GN or P-GP).

The Commission also agrees with the commenter that the property owner, or owners, on Hog Island will have a number of development options moving forward. These options include potential creation of new lots in the D-RS subdistrict by applying for an amendment to SP 3244, provided any proposal meets the applicable review criteria for a moderate density recreation-based residential subdivision and does not make the subdivision more non-conforming. Additionally, the property owners could apply for a permit to construct one or more dwellings inside or outside of the D-RS subdistrict without amending SP 3244, provided such development does not meet the definition of a subdivision, and otherwise complies with applicable regulations and standards.

Action(s): The locations and configurations of four of the proposed D-RS subdistricts were revised at the request of the property owners.

2) *Topic: Designation of the Moose River Shoreline as P-SL1*

During the 30-day written comment period, LUPC staff identified that the Moose River corridor in the southwestern corner of the Concept Plan area was erroneously designated on the draft map dated 3/2/2023 as Shoreland Protection Subdistrict 2 (P-SL2). This segment of the river meets the requirements for a Shoreland Protection Subdistrict 1 (P-SL1). P-SL1 subdistricts include areas within 250 feet of the normal high-water mark of flowing waters downstream from the point where such waters drain 50 square miles or more.

Commenter(s): LUPC Staff

Response: The Commission agrees that the P-SL Subdistrict designation for the Moose River shoreline should be corrected on the draft map.

Action(s): The revised draft zoning map shows the corrected designation.

3) *Topic: Rezoning Areas Outside the P-RP Boundary and Allowed Uses*

A commenter requested that the Commission consider rezoning several islands and areas of shoreline outside the P-RP boundary as part of the staff-initiated rezoning resulting from the expiration of the Concept Plan. The commenter also noted concerns about camping in non-designated camp sites and shoreline docks and access.

Commenter(s): Rob Davis, Managing Partner, Coburn Island Group

Response: This staff-initiated rezoning does not include areas outside of the P-RP boundary, so no changes are proposed at this time for Hodgeman's Beach, Attean Landing, or Gull, Turkey, or Rock Islands. Regarding camping and shoreline access, current LUPC rules allow temporary docks and tent and shelter camping without a permit in the P-AL and P-GP subdistricts. Any concerns about the occurrence or location of these uses on a given property should be directed to the property owner.

Action(s): No action taken.

- G. Finding: Based upon the record and the above analysis, the Commission finds that the application for zone change was properly noticed consistent with the applicable sections of Chapter 4, Sections 4.04(B)(3)(a)(1)(2) and (3), and 4.04(A)(3)(b).

III. GENERAL CRITERIA FOR ADOPTION OR AMENDMENT OF LAND USE DISTRICT BOUNDARIES

A land use district boundary may not be adopted or amended unless there is substantial evidence that: 1) the proposed land use district is consistent with the standards for district boundaries in effect at the time, the comprehensive land use plan and the purpose, intent and provisions of Chapter 206-A; and 2) there is substantial evidence that the proposed land use district has no undue adverse impact on existing uses or resources or a new district designation is more appropriate for the protection and management of existing uses and resources within the affected area. 12 M.R.S. §685-A(8-A) of the Commission's statute and restated in Section 10.08(A) of the Commission's *Land Use Districts and Standards*, 01-672 C.M.R. Ch. 10, last revised March 29, 2022 (Chapter 10).

11. Consistency with the Standards for District Boundaries:

- A. Criteria and standards: A land use district boundary may not be adopted or amended unless there is substantial evidence that the proposed land use district is, among other criteria, consistent with the standards for district boundaries in effect at the time. 12 M.R.S. §685-A(8-A)(A), restated in Chapter 10, §10.08(A)(1).

Regarding the duration and termination of a Resource Protection Plan, relevant criteria are provided in Chapter 10, §10.23(H):

At the termination of a plan, the Commission will, in conformity with its comprehensive plan, statutes, and standards, designate appropriate zoning which is reasonably consistent with zoning in accordance with Section 10.08,A. In the event that a plan is terminated, all transactions initiated as a component of the plan, including without limitation, the granting of conservation easements or restrictive covenants on subdivided lands will continue to apply to the extent that they are covered by legal contract, deeded covenants, permit or other legal requirements.

1) *Residential Development Subdistrict (D-RS)*

- a) **Description:** In accordance with Chapter 10, §10.21(M)(1), the purpose of the D-RS subdistrict is to set aside certain areas for residential and other appropriate uses to provide for residential activities apart from areas of commercial development. According to Chapter 10, §10.21(M)(2)(a)(2), the D-RS subdistrict must include “Recorded and legally existing single family residential subdivisions, including mobile home parks, having 4 or more lots.”
- b) **Proposed Zoning:** In accordance with Chapter 10, §10.21(M)(2)(a)(2), many of the lots approved in SP 3244 are proposed to be zoned D-RS Subdistrict. Some lots have alternate zoning proposed at the request of the property owner or due to the unique circumstances of the lot or deed restrictions, as allowed under 12 M.R.S. §685-A(5) of the Commission’s statute.

The D-RS subdistrict will allow property owners whose deeds do not restrict further division of their property to request an amendment to SP 3244 to further subdivide. Any deed restrictions or covenants in place for a given property remain in place regardless of the zoning.

2) *General Management Subdistrict (M-GN)*

- a) **Description:** In accordance with Chapter 10, §10.22(A)(1), the purpose of the M-GN subdistrict is to permit forestry and agricultural management activities to occur with minimal interferences from unrelated development in areas where the Commission finds that the resource protection afforded by protection subdistricts is not required. As described in Section 10.22(A)(2), this subdistrict is described as applying to areas that are appropriate for forest or agricultural activities, and that do not require the special protection afforded by the protection subdistricts.
- b) **Proposed Zoning:** All areas not zoned for development or protection will be zoned M-GN Subdistrict.

3) *Accessible Lake Protection Subdistrict (P-AL)*

- a) **Description:** As provided in Chapter 10, §10.23(A)(1), the purpose of the P-AL subdistrict is “to maintain and protect the existing natural values of the accessible, undeveloped, high value lakes within the Commission's jurisdiction. This is the class of lakes described as Management Class 2 lakes in the Commission's Comprehensive Land Use Plan. It is the intent of this subdistrict to restrict development.” As described in Section 10.23(A)(2), this subdistrict includes areas surrounding bodies of standing

water classified as Management Class 2 lakes and must extend 500 feet from and around the water body measured from the normal high water mark.

- b) **Proposed Zoning** The shoreline of Attean Pond within the Concept Plan area will be zoned P-AL subdistrict within 500 feet from and around the water body measured from the normal high-water mark.

4) *Great Pond Protection Subdistrict (P-GP)*

- a) **Description:** In accordance with Chapter 10, §10.23(E)(1), the purpose of the P-GP Subdistrict is “to regulate residential and recreational development on Great Ponds to protect water quality, recreation potential, fishery habitat, and scenic character.” In accordance with Section 10.23(E)(2), the P-GP subdistrict shall include areas within 250 feet of the normal high water mark, measured as a horizontal distance landward of such high water mark, of those bodies of standing water 10 acres or greater in size.
- b) **Proposed Zoning:** Except for the subdivision lots zoned D-RS, the shorelines of Wood Pond, Little Big Wood Pond, Attean Pond, Mud Pond, Long Pond, Horseshoe Pond, Benjamin Pond, and Clearwater Pond that are included in the Concept Plan area will be zoned P-GP Subdistrict within 250 feet, measuring in a straight line from the normal high-water mark of bodies of standing water 10 acres or greater in size.

5) *Recreation Protection Subdistrict (P-RR)*

- a) **Description:** As provided in Chapter 10, §10.23(I)(1), the purpose of the P-RR subdistrict is to provide protection from development and intensive recreational uses to those areas that currently support, or have opportunities for, unusually significant primitive recreation activities. In accordance with the description of the subdistrict in Section 10.23(I)(2), trails, and areas surrounding bodies of standing and flowing water and other areas which the Commission identifies as providing or supporting unusually significant opportunities for primitive recreational experiences, are included in this subdistrict. Bodies of standing water so classified include, but are not limited to, those found to meet the definition of Management Class 1 or Management Class 6 Lakes.
- b) **Proposed Zoning:** The P-RR subdistrict applies to areas within 1/2 mile of Management Class 6 (MC-6) lakes. Due to the presence of multiple Management Class 6 lakes, the Benjamin Valley will be zoned P-RR as it was prior to the Concept Plan. The P-RR boundary also serves as the boundary for the Benjamin Valley Conservation Easement. This subdistrict also applies to certain trails which the Commission identifies as providing or supporting unusually significant opportunities for primitive recreational experiences. There are two, 200-foot-wide P-RR zones proposed within the Concept Plan area: one along the Holeb-Attean Portage Trail; and one on the Sally Mountain trail.

6) *Shoreland Protection Subdistrict (P-SL1 and P-SL2)*

- a) **Description:** As provided in Chapter 10, §10.23(L)(1), the purpose of the P-SL subdistrict is to regulate certain land use activities in certain shoreland areas in order to maintain water quality, plant, fish and wildlife habitat, and in order to protect and

enhance scenic and recreational opportunities. As described in Section 10.23(L)(2), this subdistrict includes:

P-SL 1 - Areas within 250 feet of the normal high water mark, measured as horizontal distance landward of such high water mark, of (a) coastal wetlands, and (b) flowing waters downstream from the point where such waters drain 50 square miles or more.

P-SL2 - Areas within 75 feet, measured as a horizontal distance landward, of (a) the normal high water mark of flowing waters upstream from the point where such channels drain 50 square miles and (b) the upland edge of those freshwater wetlands identified in Section 10.23,N,2,a,(1),(c) and (2), and (3); and (c) the normal high water mark of bodies of standing water less than 10 acres in size, but excluding bodies of standing water which are less than three acres in size and which are not fed or drained by a flowing water.

- b) **Proposed Zoning:** A 250-foot P-SL1 Subdistrict will be placed along the Moose River, consistent with how it is currently zoned outside of the P-RP subdistrict. A 75-foot P-SL2 Subdistrict will be placed along minor flowing waters, the upland edge of wetlands of special significance, and bodies of water less than 10 acres in size. Note that the P-SL2 Subdistrict areas are not always depicted on the draft map because they are too narrow at that scale, but nevertheless will be in effect in these areas.

7) *Soils and Geology Protection Subdistrict (P-SG)*

- a) **Description:** As provided in Chapter 10, §10.23(K)(1), the purpose of the P-SG subdistrict is to protect areas that have precipitous slopes or unstable characteristics from uses or development that can cause accelerated erosion, water sedimentation, mass movement, or structural damage, all of which could cause public danger or threaten public health. These areas are 10 acres or more in size, identified by the Commission as having average slopes greater than 60 percent; or areas 10 acres or more in size identified by the Commission as having unstable soil which, due to a combination of slope, vegetation, soil type and underlying geology, are subject to accelerated erosion or mass movement.
- b) **Proposed Zoning:** There are three areas that meet the 60 percent slope criteria and are proposed to be zoned P-SG Subdistrict. One is on Attean Mountain and is a strip of steep slopes along the south side just below the summit of the eastern peak. The other two are separate areas on portions of Sally Mountain.

8) *Wetland Protection Subdistrict (P-WL1, 2 & 3)*

- a) **Description:** As provided in Chapter 10, §10.23(N)(1), the purpose of the P-WL subdistrict is to conserve coastal and freshwater wetlands in essentially their natural state because of the indispensable biologic, hydrologic and environmental functions which they perform.
- a) **Proposed Zoning:** Proposed zoning includes P-WL1, 2, or 3 subdistrict zoning for all wetland areas depicted on the National Wetland Inventory map, in accordance with

definitions in Section 10.23(N)(2). In areas where P-WL resources overlap with the P-RR, the P-RR also applies. In response to comments received from the Maine Natural Areas Program (MNAP), wetlands within the Concept Plan boundary and in the vicinity of the Number Five Bog will be designated as P-WL1 based on MNAP's data.

- B. Analysis: All proposed zoning takes into account appropriate protection of the resources present. Development zones have been carefully designated around certain cabin lots approved in SP 3244 or as envisioned by the expiring Concept Plan. No changes in use or additional allowed uses are proposed as part of the zoning petition.
- C. Finding: Given the descriptions of the proposed subdistricts, Finding #13(C) below regarding existing uses and resources, and analysis of the proposal as a whole, the Commission finds that the proposed subdistricts are consistent with the standards for district boundaries in effect at this time in accordance with 12 M.R.S. §685-A(8-A) of the Commission's statute and restated in Chapter 10, §10.08(A).

12. Consistency with the Comprehensive Land Use Plan (CLUP):

- A. Criteria: Pursuant to 12 M.R.S. §685-C(1), the Commission has adopted a *Comprehensive Land Use Plan*, ver. 2010 that guides the Commission in developing specific land use standards, delineating district boundaries, siting development, and generally fulfilling the purposes of the Commission's governing statute. The CLUP includes goals, policies and principles that address, among other items, land conservation, forest resources, recreational resources, scenic resources, and water resources, which the Commission evaluates regarding a proposal's consistency with the CLUP.
 - 1) *Land Conservation*: The land conservation goal outlined in the CLUP encourages the long-term conservation of select areas of the jurisdiction that are particularly representative of its cultural and natural values, including working forests, high-value natural resources and recreational resources. CLUP, pg. 10.
 - 2) *Forest Resources*: The forest resources goal outlined in the CLUP aims to conserve, protect, and enhance the forest resource in a way that preserves its important values, including timber and fiber production, ecological diversity, recreational opportunities, as well as the relatively undeveloped remote landscape that it creates. CLUP, pg. 14. Related policies include:
 - a) Supporting uses that are compatible with continued timber and wood fiber production, as well as outdoor recreation, biodiversity, and remoteness, and discourage development that will interfere unreasonably with these uses and values; and
 - b) Protecting areas identified as environmentally sensitive by regulating forestry activities, timber harvesting and construction of land management roads.
 - 3) *Recreational Resources*: The recreational resources goal in the CLUP aims to conserve the natural resources that are fundamental to maintaining the recreational environment that

enhances diverse, abundant recreational opportunities. CLUP, pg. 17. Relevant policies include:

- a) Encouraging diverse, non-intensive and nonexclusive use of recreational resources and protection of primitive recreational opportunities in certain locations; and
 - b) Supporting cooperative efforts that ensure continued public access across, and recreational use of, private lands; and
 - c) Supporting efforts that ensure continued public access to public waters.
- 4) *Scenic Resources*: The scenic resources goal in the CLUP aims to protect the high-value scenic resources of the jurisdiction by fitting proposed land uses harmoniously into the natural environment. CLUP, pg. 18.
- 5) *Water Resources*: The water resources goal in the CLUP aims to preserve, protect, and enhance the quality and quantity of surface waters and groundwater, with policies including protecting the recreational and aesthetic values associated with water resources, and conserving and protecting lakes, ponds, rivers, streams, and their shorelands, which provide significant public recreational opportunities. CLUP, pg. 18.

B. Analysis:

- 1) *Land Conservation*: The proposed zoning will not affect the permanent conservation easements in place within the Concept Plan area. These easements, together with more recent additions, will continue to support the CLUP goal of long-term conservation of a unique region of working forest, high-value natural resources, and remote recreational resources.
- 2) *Forest Resources*: Proposed zoning, in combination with the conservation easements, will allow for long-term forest resource management, and compatibility with outdoor recreation, local biodiversity, and protection of environmentally sensitive areas.
- 3) *Recreational Resources*: Proposed zoning will allow for continued use and maintenance of public access points for a diverse array of primitive recreational uses within this remote area. Management of the public recreation sites by the Bureau of Parks and Lands, in cooperation with private landowners, will ensure safe and reliable public access for recreation, including for the popular Attean-Holeb Bow Trip.
- 4) *Scenic Resources*: Proposed zoning in conjunction with the permanent conservation easements will limit allowed uses and minimize the scale and intensity of any future development, which will help to maintain and protect the natural aesthetic values within the area. See section 11(A)(1-8) above for additional details.
- 5) *Water Resources*: Much of the shoreline encompassed in the Concept Plan area is permanently protected, either through fee ownership by the State of Maine or through conservation easements. The shoreland areas along the great ponds are designated P-GP or P-AL, which limit waterfront uses along the lakeshores and provide for continued protection of water quality. The Moose River frontage in the Concept Plan area is

designated P-SL1, and the lands within 250 feet of either side of the river have been transferred in fee to the State of Maine. See section 11 above for additional details on the purpose and descriptions of these subdistricts.

- C. Finding: The Commission, having considered the goals and policies of the CLUP, policies and principles highlighted in this decision document, as well as the various provisions of the CLUP more generally, finds the rezoning is consistent with the Commission's *Comprehensive Land Use Plan*.

13. No Undue Adverse Impact:

- A. Criteria: A land use district boundary may not be adopted or amended unless there is substantial evidence that the proposed land use district has no undue adverse impact on existing uses or resources, or a new district designation is more appropriate for the protection and management of existing uses and resources within the affected area. 12 M.R.S. §685-A(8-A)(B), restated in Chapter 10, §10.08(A)(2).

B. Analysis:

- 1) *Existing uses*: Proposed zoning changes will accommodate the continued use of this large area for forest management and timber harvesting activities, as well as remote recreational uses. No development areas are proposed other than the D-RS subdistricts proposed for certain previously approved cabin lots. Eight of the lots approved in SP 3244, including the two campground lots, will not be zoned for residential development either at the request of the property owner or due to special circumstances of the lot. Therefore, no undue impacts to existing uses are expected as a result of the rezoning.
- 2) *Existing resources*:
 - a) **Forestry Resources**: The Maine Forest Service reviewed the application and did not submit any comments on the proposed zoning.
 - b) **Fish and Wildlife Resources**: The Maine Department of Inland Fisheries and Wildlife (MDIFW) reviewed the petition and stated that based on the information provided, current MDIFW data sources and maps, their review indicates that the proposed zoning is likely to provide for adequate and appropriate protections for the known resources present. However, MDIFW identified the presence or potential presence of multiple protected species and significant wildlife habitats, and recommended that prior to any future site disturbance, further consultation be conducted to determine if site-specific surveys will be needed to ensure that impacts to protected resources are avoided.
 - c) **Plant Species and Communities**: The Maine Natural Areas Program (MNAP) reviewed the petition and submitted comments related to the designation of certain wetland protection subdistricts within and outside of the Concept Plan area. In response to these comments, certain P-WL2 and P-WL3 wetlands within the P-RP boundary are proposed to be redesignated as P-WL1 wetlands.

- d) **Historic Resources:** The Maine Historic Preservation Commission (MHPC) reviewed the petition and did not submit any comments on the proposed zoning.
 - e) **Recreational Resources:** The Maine Bureau of Parks and Lands reviewed the proposed zoning with regards to existing and anticipated public recreational uses and indicated they did not have any comments regarding the proposed rezoning.
- C. **Finding:** As a result of this initial evaluation of the impacts on existing uses and resources, and given that any future development proposals will likely include consultations with the applicable resource agencies, the Commission finds that there is substantial evidence that the proposed land use districts will have no undue adverse impact on existing uses or resources in accordance with 12 M.R.S. §685-A(8-A)(B), restated in Chapter 10, §10.08(A)(2).

14. Consistency with 12 M.R.S., CH. 206-A:

- A. **Criteria:** A land use district boundary may not be adopted or amended unless there is substantial evidence that the proposed land use district is consistent with the purpose, intent, and provisions of 12 M.R.S. ch. 206-A. 12 M.R.S. §685-A(8-A)(A), restated in Chapter 10, §10.08(A)(1). The purpose and scope of 12 M.R.S. ch. 206-A includes principles of sound planning, zoning, and development. Whether a project provides for consistent, effective, and appropriate land management and resource protection are important considerations for large-scale zoning projects such as described herein.
- B. **Analysis:** As discussed in Findings #11 and 12, and 13 above, the proposed rezoning reflects the most appropriate replacement subdistricts, is consistent with the CLUP, and will effectively provide for continued long-term management of the Concept Plan area for forest resources, natural resources, and recreational resources.
- C. **Finding:** The Commission finds, in general, that its determination on consistency with the CLUP establishes consistency with the purpose and scope of the statute under which the CLUP must be adopted. This finding is based on the following: The purpose and scope of Chapter 206-A are embodied in the broad goals of the CLUP, and, in accordance with 12 M.R.S. §685-C(1), “[t]he [C]ommission must use the [CLUP] as a guide in ... generally fulfilling the purposes of this chapter.” Given the above analysis for this project, the Commission finds that the proposed rezoning is otherwise consistent with the purpose and intent of the statute.

15. The facts are otherwise as represented in the application for Amendment F to Zoning Petition ZP 532 and supporting documents.

IV. FINAL CONCLUSIONS

Based upon the above analysis and findings:

- 1. The Commission concludes that there is substantial evidence in the record (see Finding #11) that the proposed land use districts are consistent with the standards for district boundaries in effect at

this time, satisfying the corresponding portions of 12 M.R.S. §685-A(8-A)(A), restated in Chapter 10, §10.08(A)(1).

2. The Commission concludes that there is substantial evidence in the record (see Finding #12) that the proposed land use districts are consistent with the *Comprehensive Land Use Plan*, satisfying the corresponding portions of 12 M.R.S. §685-A(8-A)(A), restated in Chapter 10, §10.08(A)(1).
3. The Commission concludes that there is substantial evidence in the record (see Finding #13) that the proposed land use districts have no undue adverse impact on existing uses or resources, satisfying the corresponding portions of 12 M.R.S. §685-A(8-A)(B), restated in Chapter 10, §10.08(A)(2).
4. The Commission evaluated the petition with respect to consistency with 12 M.R.S. ch. 206-A and the principles of sound planning, zoning, and development. Having considered the existing uses and resources; the type and intensity of the development that the rezoning is intended to accommodate; the permanent measures in place to protect scenic, natural, and recreational resources; the review agency comments; and the record as a whole, the Commission concludes approval of the petition would be an act of sound land use planning, and that the proposed rezoning is consistent with the purpose, intent and provisions 12 M.R.S. ch. 206-A, satisfying the corresponding portions of 12 M.R.S. §685-A(8-A)(A), restated in Chapter 10, §10.08(A)(1).

Therefore, the Commission approves the petition of the Maine Land Use Planning Commission staff to replace the expiring Resource Plan Protection subdistrict with other appropriate zoning in Attean Township and Dennistown Plantation, Somerset County, Maine.

In accordance with 5 M.R.S. §11002 and Maine Rules of Civil Procedure 80C, this decision by the Commission may be appealed to Superior Court within 30 days after receipt of notice of the decision by a party to this proceeding, or within 40 days from the date of the decision by any other aggrieved person. In addition, where this decision has been made without a public hearing, any aggrieved person may request a hearing by filing a request in writing with the Commission within 30 days of the date of the decision.

DONE AND DATED AT BREWER, MAINE THIS 10TH DAY OF MAY 2023.

By: _____
Stacie R. Beyer, Executive Director

The changes in subdistrict designations are effective on July 1, 2023.¹

¹In accordance with the Concept Plan approved by the Commission in ZP 532, replacement zoning for those areas encompassed by the resource protection plan subdistrict become effective upon expiration of the plan.

ATTACHMENT B.*

DRAFT LAND USE GUIDANCE MAPS

ZP 532-F

Attean Township and
Dennistown Plantation

ATTACHMENT C.*

WRITTEN COMMENTS RECEIVED

ZP 532-F