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SUMMARY OF ISSUES

RELATED TO THE PLUM CREEK CONCEPT PLAN PROPOSAL FOR THE MOOSEHEAD LAKE REGION
 PRESENTED TO THE LAND USE REGULATION COMMISSION
 AT THE AUGUST 2005 SCOPING SESSIONS AND IN FOLLOW-UP WRITTEN SUBMITTALS

INTRODUCTION

In August 2005, LURC staff held four “issues scoping sessions” in Greenville, Rockwood, Moose River, and Hallowell regarding the concept plan proposal submitted by Plum Creek. At those sessions, members of the public were provided the opportunity to present issues that LURC should consider in its review of the concept plan proposal. The public was also invited to submit written materials to LURC presenting these issues. LURC staff explained to the public that it was in the early stage of reviewing Plum Creek’s proposal as part of a process that will last for many months and that, at the outset of this review process, they desired the public’s assistance in identifying the issues relevant to this proposal. LURC staff explained that the public would have additional opportunities for input concerning the substance and merits of the proposal, including at formal public hearings before the Commission. Close to one thousand persons attended these scoping sessions, and nearly 150 people spoke. Hundreds of written comments were sent to LURC.

Since these sessions, at least one member of the LURC staff has carefully reviewed each comment presented at the scoping sessions and each comment submitted in writing. The information below constitutes the staff’s attempt to capture the issues raised in the course of this process to date. No effort was made by the staff to “screen” comments based on relevance to the regulatory criteria by which the Commission will evaluate Plum Creek’s proposal, or based on whether the review team agrees or disagrees with the issue. Comments raising identical or very similar issues were consolidated. Comments received prior to August 16, 2005, or after October 10, 2005, were not included in this summary. Finally, the categories by which the comments are organized below have no regulatory significance, and were established simply as a way of arranging broadly similar issues.

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DEVELOPMENT ISSUES

NEED

- Is there a public need to rezone land for additional residential development, industry and recreation? Consider the existing tourism infrastructure (existing resorts, sporting camps, campgrounds, etc.) and industrial areas (Greenville industrial park), the number of vacant lots or vacation homes for sale.
- Does the proposal balance the need for economic development and growth with the need for protecting the environment and cultural heritage of the region?
- In general, is the proposal an appropriate remedy to the needs of the area (lack of jobs, population decline, sustaining medical, school and other public services)? Will it help reverse general and school population declines in the area?
- Is there a need for the proposed marina in the Lily Bay area? Consider the pending or recent sale of the Beaver Cove Marina and potential impacts to existing marina facilities. Consider the existence of public boat launch facilities at nearby Lily Bay State Park.
- How has LURC's existing zoning and land use framework affected the availability of lots in the jurisdiction? Has this regulatory framework impacted the 'demand' for lots?
- How do data about population decline and high unemployment in the region factor into the LURC review process, particularly the need criterion?
- Will the proposed residential lots help meet the market demands of current empty nesters who may be vacationers today but will become year-round residents of the area in the next decade? Doesn't this contribute to the well-being of the area?
- Doesn't LURC's guidance document require evidence and documentation from non-interested persons of demonstrated need? Isn't the only evidence of such coming from real estate brokers with economic interest in the outcome?

LOCATION AND GROWTH

- Is the proposed development compatible with smart growth and sustainable development practices (including redevelopment, infill)? How might impacts of sprawl be reduced? Does the proposed development encourage 'wilderness sprawl' and unrestricted growth? Consider development proposed for distant ponds (Fish, Luther, Knight, Roaches) and in the Big W area. How is this development in keeping with LURC's adjacency principle?
- Is it accurate to claim that all 426,000 acres and all of the proposed development are within a "high growth fringe area"?
- Is the proposed development proximate to and supportive of existing communities? Will the proposed development draw opportunities away from the Greenville-Rockwood-Jackman areas?
- Should the proposal include Plum Creek's acreage within Greenville?
- Are comparisons with other lake regions that have experienced sprawl (Sebago, Belgrade, Winnepesaukee, Tahoe) realistic? Consider the distance of the Moosehead Lake area from metro areas, the size of nearby service centers, and the level of economic stimulus in the region.
- How is development proposed for the Big W area consistent with the Comprehensive Land Use Plan (CLUP) statement of discouraging haphazard growth patterns? Consider that this is one of the least developed and most inaccessible sites on Moosehead Lake. Consider impacts to the historic/archaeological value of existing development, natural resources, primitive recreation, and boat access. Consider the potential for ice damage. Consider compatibility with existing uses and traditions, and whether the proposed development would significantly alter the character of this area.
- Is the proposed development in the Spencer Bay and Lily Bay areas, near the western boundary of the 100-Mile Wilderness, consistent with the CLUP's characterization of a "vast forested area that is largely undeveloped and remote from population centers"? Will residential development in the southern fringe of this intact forest push the remote character of the region farther north, in a way that is contrary to the CLUP?
- Should development in the Rockwood area be concentrated on the south side of Blue Ridge Hill, in the form of a village center? Consider the impact of development north or west of Rockwood. Will this bring too much traffic through Route 15?
- How does the proposed development pattern compare with the potential development pattern allowed under current law?
- Why does Plum Creek not acknowledge the Moosehead region as being part of the North Maine Woods? Consider the history of Maine and historical literature describing the area.

- Does the proposed development pattern allow for day visitors to Greenville to enjoy access to undeveloped shorelines and pristine, undeveloped lakes?
- How can the LURC review criteria be evaluated if the location of certain proposed development (e.g. rental cabins and sporting camps) hasn't been identified?
- How should the fact that only 2% of the 426,000 acres are proposed for development be put into perspective? Is 2% nevertheless character-altering? Are there other percentages that are as relevant, such as the percentage of shore lands in Plum Creek's ownership, excluding undevelopable shore lands, that will be developed?
- Evaluate the complete development history over the past 20 years of the region. Create visuals of build-outs for Plum Creek's proposals. Consider other current or potential development proposals in the region.
- Is this proposal consistent with the most current knowledge about sustainability? Refer to 'The Natural Step for Communities: How Cities and Towns Can Change to Sustainable Practices' by Sarah James and Torbjorn Lahti.
- Was this the type of development proposal that the Commission had in mind in creating the concept plan scheme?

RESORT FACILITIES

- Does the proposed Lily Bay resort fit the character of the region? Consider Sunday River, Sugarloaf, the Rangeley area, and historic resorts such as Kineo as models for comparison. Evaluate whether these models have enhanced the economy of nearby towns (e.g. Has Sugarloaf supported the Kingfield economy?).
- Consider the size and location of the proposed resorts. What is the appropriateness of a full-service resort 20 miles from Greenville, versus one closer to or in Greenville?
- Would the proposed resort facilities duplicate existing tourist services in the region? Are existing resort facilities in the region being utilized at full capacity? If not, why not? Consider the Big Squaw resort.
- Is Big Squaw, as a ski area, comparable to the proposed resort facilities? What is current status of Big Squaw mountain area? Will a new resort be economically viable if existing ones are having trouble?
- Why isn't Plum Creek proposing to develop Moose Mountain?
- What season will the proposed resort facilities be geared to? What needs exist in the region for certain seasonal economies? Consider whether the winter economy is as well developed as the summer economy.
- What impacts would the proposed resorts have on the flow of tourist dollars within the local and regional economy? Consider the effects of proposed on-site resort services on existing local tourist services, including retail shops, gas stations, restaurants, and inns. Consider the impact of local competition with similar facilities.
- Will the proposed resort condominiums create exclusivity or crowding?
- Does the proposed golf facility make sense, given that golf is on the wane in popularity?
- Why are there so few details about the resorts within the proposal? Exactly what will these resorts be like?
- Is the proposed marina at the Lily Bay resort sited appropriately? Consider the rockiness and shallowness of the lake bottom at this site (will the lake bottom be churned up? Will it require dredging?), as well as the presence of wetlands in this location.
- Will the proposed resorts be certified for environmental compatibility by an independent organization such as Audubon International? Can the resort be designed as an "eco-destination," with ecologically appropriate technologies (e.g. for energy production) and materials used in the development of the facilities as well?
- What impacts will the proposed resorts have on Lily Bay State Park and its visitors? Consider the impact of the proposed marina on the park's swimming beach and the visitors who use the park as a launch site for canoe and kayak trips.
- Would 'contained resorts' that encourage transient occupancy and provide on-site services to visitors not be a better option than scattered and excessive private home development? Would such facilities provide for better long-term employment than temporary second home construction?

INDUSTRIAL SITE

- For areas proposed for industrial use, consider the concept of closed loop industrial parks, where each industry is fueled by the waste products of another industry in the park.

CAMPGROUNDS AND SPORTING CAMPS

- In evaluating whether a need exists for a new campground in the Moosehead Lake area, consider the impacts of RV's, particularly on the Roach River (fisheries, tourism, and primitive recreation), the few numbers of campsites along the west shore of Moosehead Lake (the need for sites in Big Moose and Big W Townships), and the relative abundance of campgrounds on the east side of Moosehead Lake.
- Is there a need for a new campground in Kokadjo? Would this lead to competition with existing facilities(Lily Bay state park, Casey's, Northern Pride, South Inlet Campground, Nahmakanta)? Is the access road capable of accommodating such uses in a safe manner?
- Who will benefit from the proposed campground in Kokadjo?
- Is the proposed campground in Kokadjo consistent with the intent of the First Roach Pond concept plan, in that no further development would be proposed in the area?
- Would campgrounds and campsites be buffered from adjacent uses?
- How many campsites, and which ones, that are now available to the public will be eliminated by the proposed development? Will these campsites be replaced?
- Is there a need for additional sporting camps in the area? Consider impacts of competition with existing sporting camps, hotels and motels, and other short-term rentals.
- Why are the proposed sporting camps twice the legal size under current LURC rules?

AFFORDABLE HOUSING

- Is there a need for affordable housing in Jackman or Greenville? Would this need be met if such housing is located outside the municipal boundaries of these towns? Consider the Jackman and Greenville comprehensive plans.
- Study the impacts that this proposal will have on the cost of ownership and rental housing in the area. How will impacts be addressed? Will this proposal create a situation where people need to commute elsewhere to get to work because they cannot afford to live close to work? Will this proposal create a need for affordable housing that would result in the Maine State Housing Authority needing to provide subsidies to create such housing?
- What mechanisms will be put in place to ensure that the proposed affordable housing would be affordable years down the road?
- How much would the proposed subsidized housing units cost? Is this within the means of the local residents?
- Has a developer/partner for the proposed affordable housing been identified?

RESIDENTIAL DEVELOPMENT

- To what extent would the proposal encourage or discourage the privatization/fragmentation of forestlands that have been traditionally open to the public? Consider impacts of gated communities.
- Would the proposed residential development encourage the development of "trophy homes"?
- Does the proposal eliminate the potential of creating "kingdom lots"?
- What was the driving factor in selecting sites for development within this proposal? Was consideration given to sound watershed management? Was marketability the key force?
- Does the proposal employ cluster development principles? Are 3-acre or 5-acre lots considered cluster development?
- Why isn't the shore frontage of residential development proposed to be owned in common by a home owners association? Consider values and burdens of establishing "green belts" for the proposed residential subdivisions. Does the proposal provide incentives or plans for common amenities (such as common access to the water, common docks, etc.) and central utility corridors, thereby reducing homeowner-by-homeowner impacts on the shore?
- Doesn't this plan represent "shore and sprawl" rather than true clustering of residential lots? Consider whether the proposed design of residential lots to contemporary standards (with buffers, etc.) are more appropriate than old existing substandard lots.
- Will the proposed residential development utilize shared driveways?
- Are the proposed residential development areas 'walkable' and connected to existing services?

- Why are some of the proposed residential lots not limited to strictly seasonal use, with seasonal access and no power, in keeping with traditional development in the jurisdiction?
- Is the proposed residential development compatible with surrounding development? Consider the average total square feet of dwelling units within the region. Consider the acreages of existing lots on a lake-by-lake basis.
- What impacts would the proposed development have on existing surrounding residential development and other land owners or camp owners? Consider impacts on quality of life.
- What will be the cumulative impact of the proposed development when considered in the context of other development plans in the area, such as the subdivision proposed for Burnt Jacket?
- Should new shoreline lot development be limited to the western side of Moosehead Lake, where such development already is prevalent?

PHASING IN AND RELOCATION OF DEVELOPMENT

- Is the rate of phasing and build out for development consistent with historical development rates? How does the proposed rate of residential development compare to LURC permitting rates? What impacts would this have on LURC permitting and compliance?
- Should lot sales be limited to 70 lots per year to limit the amount of construction going on at one time and preserve construction jobs over a longer time frame?
- Since the phasing in of certain conservation elements is tied to the permit approval of back lot development, should Plum Creek choose not to go forward with approval of the final lots, what amount of shoreline will actually be protected?
- Who will oversee the proposed phasing in of development and conservation over time? Will this oversight be a burden to LURC staff? Would it be simpler to put all land proposed for protection into immediate protection upon approval of the rezoning petition?
- Is there any limit on the ability to move land in and out of the 'no development zone'? Consider the provision to allow boundary modifications as long as there is no net loss of acreage in the no development area.

SECONDARY EFFECTS

- Would the approval or implementation of this proposal lead to increased pressure to develop areas outside of the Plum Creek plan area? Consider the potential demand to develop existing travel corridors (Lily Bay Road, Route 6/15) and the remaining undeveloped Moosehead Lake shoreline.
- Will proposed development lead to increased use of motorized vehicles and watercraft (e.g. jet skis, cigar boats, ATV's, dirt bikes)? If so, what would be the impacts of such increased use on natural resources, economics, and natural character values of the area? Consider the number, size and speed of vehicles and watercraft, boat pollution, and watercraft noise.
- Conduct a simulation of increased boating use in Lily Bay resulting from the proposed residential lots and an undefined number of permanent and overnight visitors at the proposed resort.
- Will the proposed development, located a distance away from Greenville, spur strip development of supporting services, like gas stations, along roadways leading to the development?

CONSERVATION ISSUES

SCALE AND DURATION OF CONSERVATION

- How are the CLUP's "principal values" of forestry and farming, primitive recreational opportunities, high value natural resources, and a vast, largely undeveloped forest being conserved by Plum Creek's proposal?
- Does the proposed 30-year zoning conservation mechanism balance the proposed development? Does this mechanism meet the intent of the law requiring permanent conservation or its equivalent?
- Should there be more permanent conservation (in the form of easements) within the proposed plan area? Is there a need for permanent conservation easements in environmentally sensitive areas? Should other areas within the proposal be permanently protected? Consider natural resource values.

- Should conservation elements in the proposal be in perpetuity? What would be both the cost and the economic value of a perpetual conservation easement?
- Does the 30-year zoning framework accommodate potential future needs or future change?
- Is a 30-year zoning framework in keeping with sustainable forest management practices?
- Will landscape-blocks of forest and wildlife habitat with guaranteed access be permanently protected? Is landscape-level development balanced by landscape-level conservation?
- How does the proposed development square with the CLUP principle that development be contiguous or adjacent to existing development—or provide such substantial conservation measures as to warrant a waiver of the adjacency rule?

SHOREFRONT CONSERVATION EASEMENTS

- Are 500-foot deep conservation easements adequate to protect resources (lake resources, other natural resources)? Are six miles of protection on Moosehead Lake sufficient to protect the lake's resources? Is the amount of conservation proposed for the west shore of Moosehead Lake appropriate?
- What is the conservation value of short stretches of shoreline located between proposed shoreline development?
- Is the proposal's portrayal of "55 pristine ponds" accurate? Consider that many are classified by USFWS as wetlands rather than lakes, are too small to be considered great ponds, or are lakes that are virtually surrounded by broad wetlands. How much of the area represents "free" conservation, entailing no economic loss to Plum Creek in return for proposed development?
- Is an adequate amount of permanent conservation included as part of the concept plan approval (prior to acceptance of any future development)? Does the proposal allow Plum Creek to hold back on transferring shorefront conservation easements until all shorefront lots are sold?
- Are the terms of the easements adequately protective of natural resources? Consider brook trout protections.
- Are 500-foot deep conservation easements adequate to protect remote ponds? Consider in the context of the ½ -mile protection zoning, and that two remote ponds within the proposed plan area are accessible within ½-mile by two-wheel drive vehicles, contrary to zoning standards.
- Are 500-foot deep conservation easements adequate to prevent future backlot/viewshed development? What could happen at the 501-foot mark? Consider the location and amount of land 'off limits' to development due to site constraints and/or zoning.
- Within the conservation areas, will timber harvesting and road building be allowed? Will existing roads be put to bed?
- Will Plum Creek provide for endowments for the 501(c)3 organizations that will hold the conservation easements to cover costs of monitoring and legal defense?

TRAILS

- Who would be responsible for providing maintenance and repair on the proposed snowmobile and hiking trails?
- What terms are proposed for the relocation of trails? Who would be responsible for relocating such trails, in terms of cost and trail reconstruction? Is it too costly to move trails?
- What provisions have been put in place to protect the environment surrounding the trails? Does the proposal create a permanent visual and use buffer surrounding the hiking trails? Will timber harvesting or other potential conflicting uses be permitted adjacent to the trail easement? What is the easement width?
- Would ATVs be permitted on existing or proposed trails within the plan area? Would other uses, such as cross-country skiing, be permitted?
- Would proposed trails result in any impacts on natural resources? Consider habitat fragmentation and recreational use impacts.
- Would the proposed trails be helpful in securing continued economic benefits for the Greenville area?
- How will the proposed snowmobile trail be considered by non-snowmobilers?
- Why does the proposal not include the protection of hiking trails along long stretches of shoreline on Moosehead Lake?

THE ROACHES AREA

- What is the conservation benefit of selling the Roaches area to the State?
- Is rezoning for development in the high resource value Roaches area consistent with the CLUP?
- Is the proposed sale of the Roaches area to the State a 'red herring'? Consider the proposal as if the sale to the State did not happen. Would development be appropriate here?

NATURAL RESOURCES ISSUES

ECOLOGICAL IMPACTS

- What are the ecological impacts of this proposal on aquatic and terrestrial species and habitats? Consider erosion, habitat alteration and fragmentation, increased edge habitat impacts lake eutrophication, nonpoint source pollution, chemical leaching, pesticide use, nutrient pollution, wetland impacts, impervious surfaces, road building, etc. Consider the impacts of proposed development in the context of ecological impacts of existing second home development in the region. Are shore buffers in place or proposed adequate and protective?
- How does the proposal ensure that natural resources are not unduly harmed and that natural and habitat values are not unreasonably degraded? Has the Department of Inland Fisheries and Wildlife evaluated such claims within the proposal? Consider whether such evaluation can be done given that the proposal provides for the ability to relocate lots.
- Is this proposal guided by ecological planning principles?
- Will there be a significant use of pesticides and herbicides around the resort, golf course and private homes and how will this impact aquatic and terrestrial habitats?
- What provisions have been made for stormwater management and erosion/sedimentation control? Evaluate pre- and post-construction discharge rates.
- Will there be sufficient resources in the state agencies to fully examine ecological impact issues?
- Conduct a resource and land use inventory and assessment of areas within the proposal most suitable for specific land uses.

WATER RESOURCES

- Is the amount and location of proposed development appropriate for the waters targeted for development? Consider compatibility to existing patterns of development. Consider historic growth rates of each water body individually.
- What resource impacts would this proposal have on the waters proposed for development? Consider the cumulative impacts on water quality from golf courses (including their associated use of pesticides, herbicides and other pollutants), marinas, and other proposed development. Consider water levels and bank characteristics. What impacts will increases in water traffic create? Look carefully not just at what the shoreline will sustain, but what the lake itself can sustain. Consider impacts on the whole extent of water bodies, including portions of water bodies that are outside the plan area.
- What will be the impact to Burgess Brook, Misery Stream, Lazy Tom Stream, and other headwaters and tributaries? Consider impacts to brook trout, smelt spawning sites, loons and other species.
- Will this proposal result in a change in hydrogeology of Moosehead Lake? Consider soil disruption and hydraulic flow.
- Is there adequate groundwater in the area? Consider groundwater impacts from the proposed resort and golf course in Lily Bay.
- Can Brassua Lake support 189 additional residential lots as well as a resort and campground? Consider soils, wetlands, water quality, etc. Consider the State closure of former campsites on Brassua Lake in the proposed campground area. Consider the existing boat launch area, and the problem of enforcing the already-posted 'pack in, pack out' policy here.
- What impacts would this proposal have on the Moose River? Consider increased boating use/congestion and pollution impacts. Consider impacts on residents and visitors. Will the proposed river lots destroy the future of "wild" river rides?
- What impact would this development have on the East Outlet? Consider the number of shorefront lot, and the indeterminate number of backland lots.

- Does proposed development on small and mid-sized lakes have greater resource impacts than if the development were more focused on already developed lakes such as Moosehead Lake, with its low shoreline-to-surface area ratio? Does the fact that the number of lots proposed for each lake is less than the theoretical maximums set forth in LURC's Lakes Management Plan (based on shore frontage and surface area) allay this concern?
- Does LURC have adequate up-to-date data to make decisions about the impacts of proposed development on water quality? Do LURC's current management and resource classifications accurately/adequately reflect current lake values (e.g. Long Pond)?
- What future plans does Plum Creek have for the portions of those lakes within their ownership that are partly in and partly outside of the plan area (e.g. Long Pond)? Why are these portions excluded from the proposal?
- What does Plum Creek propose to insure that remote ponds maintain their value? Consider the State Planning Office's report, entitled "Gem Lakes".
- Require the Department of Inland Fisheries and Wildlife to conduct a thorough assessment of impacts of the proposed development on all 18 water bodies and Moosehead Lake tributaries. Consider impacts of boat launches.
- Require that all waters that are proposed for development be tested for secchi transparency, color, pH, alkalinity, conductivity, total phosphorus, and chlorophyll A, both before development begins and every year during and one year after all construction is complete.

PLANT AND WILDLIFE RESOURCES

- Has Plum Creek adequately identified high value plant and animal habitats, riparian habitats, and large forest blocks and designed around and protected these accordingly? Do state agencies have the resources to conduct an inventory of habitat types and wildlife species and populations in the area?
- What effects would this proposal have on protected (threatened or endangered) species, including the bald eagle, cougar and Canada lynx? Consider habitat, food sources and travel corridors.
- Have high quality aquatic habitats that support outstanding or unique fisheries been identified within the plan area? What provisions have been made to protect these habitats? Why does the protection of such habitats not take a watershed approach of protecting headwater ponds and drainages?
- What impacts would the proposal have on the nation's largest native trout fishery? Consider water quality impacts from siltation, pesticides, water withdrawal, increased fishing pressures, etc.. Consider how shoreline uses would be regulated. Consider such impacts especially on the Roach River and on natural trout ponds.
- What impacts would the proposal have on the spawning habitats of salmon and brook trout, particularly on the East Outlet, the Roach River, and in Moosehead Lake? What is the likelihood that Moosehead Lake will be diminished as a cold water lake with wild trout and salmon, as a result of runoff and sedimentation, and despite employment of "best practices"?
- How would the proposed development in the headwaters of the Kennebec River affect resident and migratory fish in the second largest watershed in Maine? Consider impacts on current efforts to restore fish runs in the lower river.
- What is the impact of the proposal on migratory birds that depend on the Northern Forest as breeding grounds? Consider that the Northern Forest provides habitat for 19 'at risk' species.
- What impacts would the proposal have on songbirds or their habitats? Consider the Cornell Laboratory of Ornithology's list of birds of concern. Consider impacts of increased watercraft on songbirds such as the Canada warbler.
- What impacts would the proposal have on loons and loon nesting habitat? Can they stand the increased development or will they abandon the area for quieter lakes?
- What impacts would the proposal have on deer wintering habitat? Have suitable and historic habitats been identified within the plan area? What provisions have been made to protect these habitats? Consider the Prong Pond area.
- What impacts would the proposal have on moose habitat, including travel corridors, particularly east of Moosehead Lake in the Prong Pond area?
- Would this proposal lead to an introduction or increase of invasive species in the region? What risks would this pose to natural resources? Consider the impacts of predators on existing species within the plan area, particularly those predators that might be introduced to the area or could prosper as a result of man-made conditions (e.g. crows, raccoons, domestic animals).

- How would the proposal impact furbearing animals, including otter, beaver, mink, pine marten, and fishers, in the Lily Bay area? How would this affect trapping? Consider impacts on animal food sources.
- What impacts would the proposal have on large unbroken wildlife habitat blocks favored by a range of interior forest loving species?
- Is there a need to protect wildlife preserves (areas closed from hunting and trapping)? If so, how does the proposal address such a need?
- What wildlife transportation routes are affected by the proposed development?
- What species and habitat impacts would this proposal have on Williams Stream area in Big W Township? Consider presence of loon and osprey nests, blue heron, cormorants, trout spawning sites, breeding sites for eagles and peregrine falcons, lady slippers, and some of the tallest pines in the State. Consider impacts caused by the need for an extensive back woods road network.
- Would the proposal affect the management objectives of the Department of Inland Fisheries & Wildlife in the region? Consider the state resources that have been devoted to creating and maintaining spawning areas.
- Conduct an independent environmental impact study to identify or verify habitats and species within the proposed plan area and surrounding region, and determine how the proposal will impact those species. This should include a full-scale flora and fauna survey over a minimum of four seasons. Consider impacts on food sources of species that exist in the region.

CULTURAL, ARCHAEOLOGICAL AND HISTORICAL RESOURCES

- What impacts would the proposal have on cultural, archaeological, or historical resources? Consider historic travel routes. Consider changes in use of lake resources and impacts on historically valuable shorelines. Consider 'the station' site on Brassua Lake.
- What effects would the proposal have on Native American land claims, and historic and religious sites?

FOREST RESOURCES

- Is this proposal a model of best forest management practices?
- Does this proposal rehabilitate the working forest? Consider ways that the plan can enhance wildlife habitat and rebuild forestlands.
- If new forestry standards are adopted in the future, will they apply to the proposed plan area? What would be the effect of future forestry standards designed to protect late successional forests, endangered species or other currently unanticipated issues?
- Does Plum Creek agreeing not to create residential lots in the working forest area constitute conservation of forest resources, or should it be required to do more to rebuild forestland and regain wildlife habitat?

SCENIC AND NOISE IMPACTS

- Would the proposal impact the Old Canada Road National Scenic Byway?
- What impacts would this proposal have on view sheds? Consider the potential for vegetative clearing related to development or other land uses in the plan area. Consider sizes of structures. Consider hillside lot development impacts, including proposed 5 acre lot sizes. Consider whether any elements of the proposal would deter lot owners from gradually clearing away the shore vegetative buffer to maximize views. What will be the scenic impacts of the proposal as viewed from the water?
- What impacts would this proposal have on views from mountain peaks and other scenic vistas? Consider the view from the top of Kineo. Prepare a simulation showing the impact.
- Does this proposal provide for visual access to the landscape? Has provision been made to identify and set aside land for public rights of way and safe parking to access scenic vistas? Consider need for visual access from the top of Blair Hill, along Route 15 between Greenville and Rockwood, and along Route 15 between Rockwood and Jackman.
- What impacts would the proposal and the lighting associated with any proposed development have on the night sky?
- Would this proposal result in an increase in noise pollution? Would there be noise impacts on fauna? Consider generator usage, watercraft traffic, RV traffic, noise from recreationists, construction activities, generators, etc..

- Would the proposed development lead to a change in the number or size of permanent/temporary docks on lake or river resources? If so, how would this affect scenic values of water resources?
- Has Plum Creek provided adequate topographical details to evaluate soils and scenic impacts?

CONSUMPTIVE WATER USES

- How much water would the development within this proposal require? Is there an adequate long-term supply that meets such needs? Is there adequate water supply for the proposed development in Lily Bay? What would be the water source for the proposed resort? Consider the geology (hard black shale with few seams that hold water). Conduct a groundwater study of existing aquifer and gallon per day requirements of proposed development.
- What impacts will this proposal have on the current camp owners on Brassua Lake who depend on the lake for their water supply?
- How will consumptive water usage affect water quality in the region?

ECONOMICS ISSUES

EMPLOYMENT

- What types of jobs would this proposal generate? Consider the duration, seasonality, wages, and benefits. What population groups would experience an increase in income? Will this proposal create jobs that contribute to the region's economic base and provide career path opportunities for young people in the region? Will this proposal prevent youth flight by expanding economic opportunities in the region?
- Will this proposal place jobs where they need to be – in Greenville or Rockwood, or adjacent areas? How would this proposal affect job opportunities in rim counties? Would this proposal contribute to the area's recovery from the 2003 Great Northern bankruptcy, which resulted in hundreds of net jobs lost?
- How would the proposal affect job opportunities in the forest resource manufacturing and tourism sectors of the economy? Consider the historic importance of and present trends in these sectors to the region. Would more sustainable jobs be created by alternative nature-based tourism development? Will jobs be lost in the forest products industry by the impacts from the kind of dispersed development that Plum Creek is proposing? Does this proposal address the ability of people to make a living harvesting trees? Given Plum Creek's emphasis on (and Greenville's need for) economic growth, can Plum Creek do more to bring year-round wood-related manufacturing businesses to the area?
- Greenville needs more "blue-collar" year-round jobs through organized development and a plan for predictable, long-term economic growth. Where will this come from if the State doesn't take advantage of the opportunity offered by Plum Creek's proposal?
- Will Plum Creek actually assure or invest in the job-creating activities, or simply allow for them as part of the rezoning and hope that others will create them?
- How do second home owners spend money compared with tourists?
- Will further conservation efforts lead to job opportunities being lost? Consider the protections already in place within the region and surrounding the proposed plan area.
- Will the amount of land taken by house lots, a resort and a golf course limit the land base available to Maine Guides and therefore reduce their economic opportunities, as activities like hunting will no longer be possible there?
- How much of the proposed construction work would be carried out by local contractors? Consider the number of contractors currently in the area that are local. Do lot owners prefer to bring in their own workers from away?

REAL ESTATE, PROPERTY TAXES AND LAND VALUES

- How much would the proposed residential lots be sold for? How does this compare to incomes of local year-round residents? Would the impacts on real estate, property taxes and land values make it harder for local year-round residents to purchase homes? Would the proposed development be affordable to people with low or modest incomes? Consider the incomes of traditional sportsmen.
- Would the costs or sales of proposed residential lots affect local real estate values? Would the area become unaffordable to the "average working person" as some areas of the coast have become?

- How would property taxes be affected in the surrounding organized towns? In the unorganized territories? Is there a fair way to assess the tax burden so that purchasers of the lots pay their fair share, especially to service center communities like Greenville? Consider impacts on state revenues.
- What is the future outlook for the real estate market in this area?

MUNICIPAL, COUNTY AND STATE GOVERNMENT IMPACTS

- What immediate and long-term impacts would various elements of this proposal have on service centers and organized towns outside the plan area (Greenville, Jackman, Shirley, etc.) that will be called upon to provide municipal services but may not receive any revenue from properties developed on Plum Creek lands? Is there provision to share property taxes with the communities that will supply the services?
- What immediate and long-term impacts would various elements of this proposal have on existing development nodes within the plan area (Rockwood, Kokadjo, Lily Bay, etc.)?
- Will this proposal impact local, county or state public administration tasks, such as public records, licensing, taxation, zoning, and voting tasks?
- How will increasing public burdens and costs impact relatively poor residents of Piscataquis county?
- How many year-round residents would be brought in from this proposal? How many additional school-age children would result from this proposal? Consider the declining populations in Piscataquis and northern Somerset counties.
- What will be the cost of serving proposed development with fire protection, road maintenance, solid waste disposal, etc.?

SUSTAINABILITY

- What elements are necessary for a healthy, diverse economy in northern Maine?
- Would this proposal provide for or contribute to sustainable economic development to existing communities? To the region? To the state?
- Will proposed second home residential development have a net sustained economic impact? Consider infrastructure and community service burdens in evaluating this impact.
- Are beneficial economic spin-offs (in retail, financial, home maintenance, and other services) from the proposed development likely to occur?

NET GAINS

- What would be Plum Creek's profits be from the approval of this proposal? From the implementation of the proposal (e.g. sale of property for residential and commercial development)?
- Who would benefit economically from the approval or implementation of this proposal? Consider local year round residents, visitors, second home buyers, Plum Creek shareholders, etc.
- What tax benefits will Plum Creek get? Consider company's real estate structure.
- What percentage of income generated by this proposal would stay in the local area, versus going to out-of-state developers?
- How does the amount of money Plum Creek expects to generate from this proposal compare to the value of the proposed conservation? What are the economic benefits of landscape-scale conservation easements? Conduct an independent economic analysis of this issue.

FOREST RESOURCE INDUSTRY

- Would this proposal contribute to or provide stability to the forest resource industry? Would this proposal contribute to or provide for supply of fiber for area mills? Does this proposal protect the working forest?
- Would this proposal contribute to a better return on investment for the landowner? If so, how would this affect the landowner's ability to make long-term forestry investments?
- Would this proposal cause the price of forestland to rise so much that it no longer becomes economically feasible to hold land for timber management?
- What impacts would this proposal have on forestry, particularly related to ownership fragmentation and conflicting land uses? How would the woods products industry be affected by second home development?

- Can Plum Creek make a profit from its timber operations alone? If so, what can Maine do to keep the company out of the real estate business? Consider tax incentives, purchase of Plum Creek acreage, legislation, etc.
- Are areas proposed for development currently out of forest production?

TOURISM INDUSTRY

- Does the proposal support or maintain the signature character of the North Woods of an unbroken landscape supporting natural resource based industry and nature based tourism?
- How will the proposal contribute to or take away from nature-based tourism? What impacts would the proposal have on nature-based visitors, eco-tourism, registered Maine guides, commercial sporting camps, inns, motels and lodges? Will people still make the same trip if the area becomes more developed and the same types of offerings can be found at a shorter travel distance? Consider impacts of increased competition and impacts on the wilderness experience.
- Consider the impacts to potential future eco-tourism opportunities in the region (e.g. mountain triathlon, lumberjack days festival, mountain bike races, ice carving contests, winter triathlon, canoe/kayak races, berry picking festival, float-plane fly-in). In evaluating the economic benefits of this proposal, consider the value of existing natural resources as marketing elements that currently or in the future 'sell' the Moosehead Lake region.
- Compare the impacts of historic tourism development (Great Hotels such as the Kineo Resort, camps, trains, steamers) with the tourism development proposed in Plum Creek's petition. Compare the proposal to historic levels of tourism uses. Consider the tourism conditions now and historically, including means of transportation and the population within a day's drive of the area. Kineo is mentioned in many documents, particularly the Kineo hotel. Why is there no effort being made to restore this historic structure?
- What economic results has the tourism model proposed by Plum Creek produced elsewhere in the State or country?
- Is there a need for adequate modern facilities to accommodate visitors? If so, what is that need?
- How has second home development in the region to date impacted the local or regional economy?
- Should the Moosehead Lake region be designated as an area committed to a nature-based economy? If so, how would the review of this proposal be affected?
- Does the ITS snowmobile trail component of the proposal enhance the snowmobile industry's capacity or its attractiveness?
- Would the proposed development impact Outward Bound's wilderness courses? Will Outward Bound continue to have the opportunity to use the north woods in keeping with its educational mission?
- What impacts would development on Indian Pond have on the whitewater rafting industry in this area?
- Are the proposed resorts financially feasible?

COMMERCIAL AND INDUSTRIAL USES

- What is the likelihood of a sawmill being constructed on the site offered within this proposal? What is the likelihood of an investor purchasing the mill site?
- Why isn't Plum Creek offering to construct and supply a lumber mill?
- How will the proposed commercial/industrial zone provide increased property tax revenue for the State? Consider in context of potential "pine tree development zone" designation.

PUBLIC ACCESS

- What assurances does this proposal provide for continued free access to the area for recreationists, business owners, and others? What is the duration of such assurances? Consider Plum Creek's open lands policy. Consider the location of guaranteed access within the plan area. How would the economy of the region be affected with and without approval or implementation of this proposal? How would the economy of the region be affected with and without continued free access to Plum Creek lands?
- What needs exist for public access to the Moosehead Lake shoreline? Does this proposal fulfill these needs? Consider the problems of access in the Rockwood area, with the Kineo launch site.
- Does the proposal provide for both physical and legal access to waters within the proposed plan area? What provision is there for public trailered and/or hand-carry boat launches?

MARKET DEMAND

- How do the claims of economic benefit within this proposal compare to market demand? Would this proposal do anything to change market demand?
- Consider the economic benefits of this proposal in the absence of any commitment by Plum Creek to create a market for any of the development components, other than residential lots.
- Are the claims of economic benefit consistent with actual experiences of other businesses, within the area or elsewhere?
- Does this proposal address the need to direct economic development toward the off-season or winter season in the region?
- Consider the differences between market demand for vacation home ownership and short-term lodging opportunities. How will a more rapid rate of second home construction impact the demand for short-term lodging? How do the two lodging options compare, in terms of impacts to the local economy? Does this proposal encourage more transient lodging that is close to existing communities and infrastructure?

INFORMATION NEEDS

- Does the Charles Colgan economic study answer the questions that need to be answered to determine economic impact? Consider other available economic data and studies, or conduct an independent economic study to answer additional questions related to the long-term economic viability of the proposal, the type/quality of jobs that would be created by this proposal, and the potential positive and negative effects on existing and future economic activity.
- Consider studies on wildland economics, such as those by Thomas Powers. How does keeping wildland wild work as a silent economic engine? Evaluate what impacts the proposal will have on ecosystems services. What dollar values do such services provide?
- Consider opportunity costs, both from an economic and environmental perspective.
- Consider site-specific economic impacts (for instance, impacts of development on Prong Pond on family fishing trips, moose watching and nature tour paddling excursions, etc.).
- Consider studies on economic trade-offs between development and natural resource protection.
- Conduct an economic assessment of alternative plans absent the Plum Creek proposal.

INFRASTRUCTURE AND PUBLIC SERVICES ISSUES

INFRASTRUCTURE IN GENERAL

- Does the proposal utilize or improve upon already existing infrastructure in the region? Consider service centers, existing tourism facilities such as the Big Squaw resort and the Rockwood Inn. Would the location of development, set apart from existing infrastructure, impose new costs on the region?
- Conduct a build-out study of the needs and impacts of this proposal to existing infrastructure. What infrastructure and public service expectations will visitors and new residents have of the region? Consider shopping, police presence, transportation, road quality, health care infrastructure and quality, etc.
- What impacts would the proposed rate of residential development have on regional infrastructure? Can the region adjust to accommodate this development rate? Would assessing an impact fee alleviate any infrastructure issues?
- Conduct an independent economic assessment to evaluate infrastructure costs for Greenville. Consider questions such as: How will the tax base change? How will this proposal impact affordability and quality of local residential housing?
- Once the location of roads, structures and utility lines are determined, require that this information be digitized and released to the Maine Office of GIS so that the public may review and evaluate the impacts of this proposal on hydrology, water quality, species habitats, etc.

PUBLIC SERVICES: Education, law enforcement, fire protection, rescue/health care

- What kind of public service capacity exists in the region?
- What impacts would this proposal have on existing public services? What additional public service demands would this proposal create?

- Do nearby municipalities have the capacity to provide the public services that would be required? Consider that services like fire protection are provided on a volunteer basis.
- If the demand for public services exceeds existing capacity, who would be responsible for (pay for) creating new or expanding existing services?
- Would additional schools and other services have to be built in the unorganized territory?
- Does the proposal support the need to secure the health and viability of Greenville/Jackman as a service center? Consider impacts to hospital, schools and municipal services.

UTILITIES: Water, electricity, telephone, liquid and solid waste disposal

- What kind of utility capacity exists in the region?
- What impacts would this proposal have on existing utilities? Would elements of this proposal lead to new needs for power lines or submarine cables?
- If potential impacts exceed existing capacity, who would be responsible for (pay for) upgrading existing utility capacity?
- How does the proposal address the lack of proximate septic sludge disposal sites in the area?
- Consider the existing capacity and handling problems of the Rockwood and Lily Bay transfer stations. Will existing problems be exacerbated by this proposal? Has a solution to these problems been presented?
- Does the proposed development associated with the resort facilities call for sewage treatment plants?
- Provide the power company with a best estimate on megawatt load/demand for all new service drops to all new facilities proposed. Will there be any consequences of tapping into the existing electrical infrastructure?

TRANSPORTATION

- How much traffic would be generated with the implementation of this proposal? What would be the impacts to existing travel routes within and outside the plan area, including the intersection in downtown Greenville, the boat launch in Rockwood, and roads between Interstate 95 and Greenville.
- How much traffic from large vehicles, such as RV's and buses, would be generated by this proposal? What impacts would such traffic have on local roads and parking availability?
- Can roads in their current condition provide safe travel for traffic generated with the approval/implementation of this proposal? Consider pedestrian safety.
- What will Plum Creek do to improve roadways in the region? How many miles of road construction are proposed? Will roads servicing proposed residential lots be upgraded to current LURC road standards? Will future roads be constructed to allow emergency vehicles safe passage?
- Who will be responsible for upgrading and maintaining existing roads or constructing new roads? What if the proposal places additional demands on the current transportation infrastructure? Does such an entity have the resources to address additional demands? Consider summer maintenance, winter plowing, law enforcement and emergency response.
- Does this proposal accommodate other recreation or transportation alternatives? Does this proposal include trails for differently abled people? Why does this proposal not include accommodations for bicyclists, cross-country skiing, snowshoeing, ATVs, jogging strollers, etc.? Consider the need for bicycling facilities such as paved road shoulders, bike lanes/paths, etc. Does this proposal provide for shared-use trail access for mountain biking? Why does this proposal not utilize existing rail infrastructure in the region?
- Clarify the maintenance responsibility of the 2.75 mile stretch of the Northern Road known as 'Spinney Road'.
- What provisions will be made to ensure that travelers would abstain from using the New Middlesex Road as a shortcut to access the northwest portion of the proposed plan area (particularly the proposed Big W development nodes)?
- Will an increase in traffic impact the road from Greenville to Lazy Tom Bog on the east side of Moosehead Lake? Consider safety issues and impacts to uses dependent on this travel way, such as moose sightings.
- Does the proposed development in any way reduce the necessity for vehicular modes of transportation, through proximity or other means? If not, why not?
- Would an increase in permanent roads lead to significant increases in wildlife killed by vehicles? Would areas become impassable for amphibians? Consider other ecological impacts of an increase in road infrastructure.

- What impacts would result in an increased need for gravel mining for roads and development sites? Where would such gravel mines be located?
- Will any Maine Department of Transportation facilities in the plan area continue to be able to operate?

TOURISM INFRASTRUCTURE

- What infrastructure needs currently exist or may exist in the future for the tourism sector? Consider future tourism infrastructure demands and needs, 50 or 100 years from now. What will we need to sustain watchable wildlife, for instance? What impacts would this proposal have on the infrastructure needs of the tourism sector? Consider need for lean-to's, tent platforms, scenic viewing areas with adequate parking, snowmobile trail shelters, etc.
- Conduct an assessment of all nature-based tourism assets and needs. Does the proposal fill any gaps in the infrastructure? Does it harm any existing assets?

UNIQUE CHARACTER AND TRADITIONAL USE ISSUES

SENSE OF PLACE

- What impacts would this proposal have on the public's perception of solitude, remoteness, beauty, natural heritage, and wilderness character in the plan area, region, or state? Consider impacts of the amount, location and type of development proposed; the amount, location and type of land and water traffic generated; and changing views of year-round residents, seasonal residents, and visitors.
- Remoteness is recognized in the CLUP as a non-renewable natural resource with economic value. Does the proposal meet the test of "no undue adverse impact on existing uses or resources" with respect to remoteness? Does it square with the CLUP principle of non-intensive, non-exclusive use?
- Will the area become congested and lose the very attractiveness to tourists that it now has?
- What are the long-term benefits of maintaining the region's remote character? Is this in keeping with the proposal? Consider the value of wilderness, in the context of declining wilderness areas elsewhere in the state, region and country.
- What rate of development would preserve the existing unique character of the area or region? Consider historic growth rates.
- What cumulative impacts would this proposal have on intangible experiences such as seeing the night sky unobstructed by lights or hearing the call of a loon?
- What impacts on lifestyles of year-round residents, seasonal residents and visitors would this proposal have?
- What impacts would this proposal have to the characterization of the region as being within the largest contiguous forestland east of the Mississippi River? What is the worth of an intact wilderness area that has survived 500 years of industrialization and development? Consider the distinction between wilderness and working forest.
- What impacts would the proposal have on the 'Moosehead Brand'? Consider the north woods character and the unusual blend of people that characterize the human biodiversity of the area.
- How does the replacement of predominantly seasonal camps with limited utilities and conveniences with predominantly year-round homes with utilities and improved roads alter the character of the area?
- Look carefully at how 'sense of place' was changed by Plum Creek's development at First Roach, and how the character of the lake has changed with electricity and large homes.

EXCLUSIVITY VS. DIVERSITY

- Would this proposal promote or prevent the creation of exclusive communities? Consider gated communities and 'no trespass' signs; exclusivity due to socioeconomic factors; the impact of developing primarily for better-off clientele without roots in the area.
- Who will have the privilege of enjoying the North Woods in the future? Will the wealthy inherit the region?
- Would this proposal diversify the region's cultural resources by bringing in new residents or visitors?

TRADITIONAL USES

- What impacts would this proposal have on traditional uses? Consider primitive recreation such as hunting, fishing, camping, moose/wildlife watching, birding, berry picking, hiking, canoeing, kayaking, leaf peeping, winter back country uses (skiing, dog sledding, snow shoeing) and other primitive wilderness experiences. Consider impacts of lost open space. Consider impacts on the fishing experience, particularly on the East and West Outlets and the remote ponds.
- Provide a map showing areas that will no longer be available to hunting. Consider the law prohibiting hunting within 100 yards of a dwelling.
- What impacts will the proposal have on the remote camping sites at Spencer Bay?
- What effects would proposed development on relatively undeveloped, inaccessible water bodies (e.g. Knights Pond, Luther Pond) have on recreation and traditional uses?
- How will proposed development affect traditional uses of local residents? Consider how far local residents would have to travel to find a productive fishing spot. How many gates would block their passage?
- What impacts would this proposal have on traditional public access for recreation, business, and other uses? Consider impacts to small business owners.
- What impacts would this proposal have on existing commercial sporting camp businesses? Consider secondary impacts of declining fishing quality and deer populations. Consider impacts of competition from large upscale lodging facilities.
- Traditionally, sporting camps have been family-run businesses. Are the sporting camps proposed by Plum Creek consistent with traditional uses?
- Why does this proposal not include a long-range comprehensive boating plan for Moosehead Lake, which would include the number and type of motorized boats and consider the impacts on tourism?
- Are recreational corridors that provide quality, multi-day waterway and forest backcountry trips protected?
- What impacts would the proposal have on existing camping experiences at East Outlet and upper Indian Pond?
- What will be the design of the proposed hiking trail, and how will it be buffered from incompatible activities, such as road-building, clear-cutting, and use of herbicides?

ADDITIONAL ISSUES

ADJACENT OWNERSHIPS, EXISTING DESIGNATIONS AND INITIATIVES

- What consideration will be given to existing easements adjacent to the proposed plan area? Consider FERC easements around Indian Pond (to the 960 foot contour), Brassua Lake, and the Moosehead Lake hydroelectric project. Is this proposal consistent with the Moosehead Project Comprehensive Land Management Plan (CLMP)?
- What impacts will the proposal have on the State-owned lands? Consider the Moosehead Lake shoreline acquisitions and easements, public reserves (including the game preserve north of Greenville), state parks, etc. To what extent will proposed development on the east side of Moosehead Lake diminish the purpose and value of shoreline conservation lands that the State bought from Plum Creek in 1999?
- Does the proposed development adjacent to Indian Pond and near the East Outlet conflict with the vision set forth in, and agreed to by the State, the recent Harris Dam Indian Pond/Kennebec Gorge Settlement (to maintain lands in undeveloped, natural state)?
- What impacts will this proposal have on the Northern Forest Canoe Trail? Is any portion of the Moosehead Lake shore front designated for remote water access only camping?
- What impacts will the proposal have on the 100-mile Wilderness Area? Consider the region's recreational and economic potential. How will the proposal impact this potential?
- Is this proposal consistent with the Jackman and Greenville comprehensive plans?
- Is the proposal consistent with the Department of Transportation's 10, 20, and 30-year road plans?
- What impacts will this proposal have on the connectivity of existing protected lands in the region? (Baxter, Debsconeag, Nahmakanta, Appalachian Mountain Club ownership, Borestone, etc.) Does the proposal enhance or prevent connectivity between existing conservation areas?

- Is this proposal consistent with the Atlantic Coast Joint Venture strategic plan? The Blueprint for Design and Delivery of Bird Conservation in the Atlantic Forest? The Cooperative Conservation Partnership? The Maine Forest Ecosystem Project?
- How does this proposal affect the nature tourism 'products' that the region already has? Consider the Fermata study.

ALTERNATIVES AND MODELS

- Consider and compare proposal to alternative visions/scenarios for the region: North Woods National Park, Baxter State Park expansion, current regulatory framework (consider potential for gated kingdom lots and levels of uncertainty).
- How would an eco-tourism development plan or other natural resource-based plan compare to this proposal, in terms of beneficial economics? How would a more compact development plan (closer to already developed parts of the area) compare, in terms of preserved values and costs?
- Consider the Columbia River Gorge National Scenic Act (www.gorgecommission.org; www.gorgefriends.org) as a model.
- Consider historical residential development patterns as models: Skylark (Rum Ridge), J.M. Huber (Beaver Cove – North Ridge Association). Evaluate the guiding principles of these models.
- Consider recent conservation projects as models: West Branch easement, Katahdin Forest project, Downeast Lakes project, Appalachian Mountain Club Maine Woods initiative.
- How does this proposal compare to the Rangeley prospective zoning plan?
- Are there better approaches to achieving the economic benefits and other benefits that Plum Creek claims will come from this proposal? Conduct an alternatives analysis. Hold visioning and listening sessions to obtain alternative ideas.

PLUM CREEK

- What is Plum Creek's history of land use and development elsewhere in the country? Consider the company's land stewardship record. Request public testimony from other states where Plum Creek has been involved in large-scale development. Consider the opinions of state and local agencies/officials, as well as residents.
- What has been Plum Creek's stewardship record in Maine? Consider Plum Creek's forest practices in the Moosehead area.
- What is Plum Creek's track record at First Roach? Were promises kept that were made? Conduct an independent environmental analysis to study the effects of the development authorized by the First Roach Pond concept plan. Consider the value of the conservation lots provided in that plan.
- What would happen to this proposal should Plum Creek go bankrupt?
- How does anyone know if Plum Creek is going to be around after it gets all 975 lots sold?
- What are Plum Creek's plans for its remaining land ownership outside of the proposed plan area? What are Plum Creek's plans for its ownership in Greenville, Shirley and other organized towns?
- Who are the investors, both active and silent, of Plum Creek Timber Company?

PRECEDENT AND LONG-TERM PERSPECTIVE

- What would the impacts of the approval or implementation of this proposal be 30, 50, 100, or 150+ years from now? Consider precedent-setting and 'spin-off' factors.
- What type of precedent would approval of this proposal set for other developers and landowners? Would approval of this proposal encourage additional concept plans of similar scale/scope, and lead to a 'domino effect'? Would this proposal chart a course in the direction of continuing future development in northern Maine? Would it encourage speculative development?
- Evaluate the cumulative impacts of this type of development in the Northern Forest landscape on natural resources and recreational access.
- What type of legacy for future generations would this proposal leave behind?
- Is there adequate baseline data about the landscape for future enforcement actions related to possible land use violations in the plan area? Consider videotaping the shorelines of all lakes proposed for development.
- Is LURC aware that there are many other large landowners waiting to propose similar developments on their lands in the jurisdiction?
- Would a decision on this proposal bias decisions on future development proposals in the region? If so, how?
- How does the scale of this proposal factor into the precedent-setting factor?

- Will the precedent lead to long-term erosion of the character of the North Woods – its remoteness, non-exclusivity, non-intensive use, mostly undeveloped?
- Doesn't the Plum Creek plan represent a good precedent, one that sends the right message to other large landowners that development must be contained, that land is to be held primarily as working forest, and that substantial areas must be given over to permanent conservation?
- Does this proposal encompass a large enough area to adequately plan for Moosehead Lake? Consider this proposal in the context of the greater Moosehead region. Evaluate other development proposals in the region to assess total impacts to the region.

PREDICTABILITY VS. UNCERTAINTY

- What is the value of the type and amount of predictability generated by the proposal?
- What development could occur upon expiration of the plan, in 30 years? 50 years? 100 years?
- When will the proposed residential lots and conservation easements be delineated?
- How does the provision to relocate lots if sites are found to be unsuitable (page 26 of the proposal) affect the predictability of the proposal?

LANDOWNER RIGHTS

- Consider landowner rights and equity issues when evaluating this proposal.
- Does Plum Creek's purchase of lands for timber harvesting factor into evaluating the company's development rights?
- Does Plum Creek have any vested right or entitlement to the zoning changes it is seeking?
- Does Plum Creek have title, right and interest to develop the lots being proposed in the location around Center Pond?

IMPLEMENTATION AND ENFORCEABILITY

- Evaluate the likelihood of whether the benefits claimed by Plum Creek will materialize. Consider the commercial/industrial site. Consider the likely success rates of the proposed resorts, campgrounds and sporting camps. Consider past successes and failures in the region.
- Consider impacts of the proposed development in the context of some amount of breach of regulations.
- Who will enforce all the deed restrictions and covenants once residential lots are conveyed? What impacts would this proposal have on LURC's permitting and enforcement resources? How will the State pay for staff to oversee and monitor the implementation of this proposal?
- What enforcement resources are needed to ensure compliance with the proposed zoning and land use framework?

PROCESS

- Consider the proposal carefully. Proceed cautiously. Proceed incrementally - approve only small segments of the proposal at any one time. Ensure slow and sensible growth.
- Refer to the four principal values of the CLUP often; use these as the basis for the review process.
- Is a full-scale environmental impact analysis warranted for a plan of this unprecedented scale?
- Is not the Moosehead Lake region one of the premiere "special natural areas" in the State? Rather than rezoning the area to P-RP, shouldn't it be rezoned to P-UA (Unusual Area Protection)?
- Review this proposal using the principles of the Public Trust doctrine.
- Does the State have adequate resources and expertise to evaluate the proposal? LURC staff need more professional advisors on board to properly evaluate the proposal.
- Are these types of concept plans privatizing public planning?
- Consider the proposal in the context of all of Plum Creek's land holdings, not just the proposed plan area.
- Will this proposal trigger federal review?
- Consider hosting additional scoping sessions in Maine. Gather specific information about specific sites, including an inventory process and "listening" forums.

- Is the issue of how to manage the Moosehead Lake region of the magnitude that it should be considered on a State referendum?
 - Delay consideration of this proposal until a comprehensive plan for the Moosehead region is completed. Create a Moosehead Lake region plan, instead of incremental planning. Reconsider a moratorium in the Moosehead region.
 - Plum Creek should consider withdrawing the petition until a separate process of getting information related to the region's economy and its needs has been concluded.
 - Establish a regional planning agency for the Moosehead region.
 - Is the process reaching the average working person from the Moosehead area? Were many of the locals unable to attend the scoping sessions because they are making most of their annual income during the summer seasons when these sessions were held?
 - If most year-round residents of the Moosehead Lake region were against this proposal, would it make a difference in LURC's decision?
 - Can Maine take Plum Creek's land by eminent domain to keep it in the best interests of Maine residents?
 - Include as much dialogue as possible between Plum Creek and all stakeholders.
 - Visit all the sites within the proposal by boat, air and land.
 - Keep the public informed during the review process.
 - Host a conversation about the most important natural resource-based economics and activities for the region.
 - Look carefully at the proposed rezoning language to close loopholes that could lead to activities not now foreseen.
 - What will happen if we make the process so difficult for Plum Creek that they decide to leave Maine?
 - Should the views of local area residents be given special weight?
 - Should Plum Creek be expected to engage the public much more thoroughly before arriving at a final plan?
 - What is the possibility of LURC Commissioners hearing from some members of the public before moving to formal public hearings?
-