

STATE OF MAINE
LAND USE REGULATION COMMISSION

In the Matter of Development Permit, DP 4860

Kibby Expansion Wind Power Project

Pre-filed Testimony of Catherine B. Johnson, Natural Resources Council of Maine

Submitted on behalf of the Appalachian Mountain Club, Maine Audubon and the Natural Resources Council of Maine

April 21, 2010

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Introduction

I have been the North Woods Project Director at the Natural Resources Council of Maine (NRCM) for 20 years. During that time I have been involved in reviewing and commenting on dozens of development proposals in LURC jurisdiction. I have participated fully in two full revisions of LURC's Comprehensive Land Use Plan (1990-1997 and 2005 – 2010) and I have participated in many stakeholder committees. I have been appointed to many Management Plan Advisory Committees established by the Bureau of Parks and Lands and I have served in the past, and have recently rejoined, the Forest Legacy Committee. I have participated in numerous legislative efforts including revising LURC's laws, establishing an ecological reserve system for the state's public lands, and amending the Forest Practices Act to limit liquidation harvesting. I am an avid canoeist and hiker and have paddled most of the major rivers and many lakes in the jurisdiction and have hiked many of the mountains. All of these experiences have given me a deep understanding of recreational and scenic issues facing the jurisdiction.

Summary

NRCM is a strong supporter of both protecting the scenic and recreational resources of the state and developing renewable energy as one part of a strategy to limit pollution and climate change. We believe that the Maine Wind Energy Act (35-A MRSA § 3401) provides a balanced approach for achieving both of these goals.

After reviewing the proposed Kibby expansion on Sisk Mountain, we have concluded that the northern eight turbines can meet the legal criteria regarding the effect of the proposed project on scenic character and related existing recreational uses if certain conditions are included in the permit. While there would be some impact on scenic resources of statewide and national significance and existing uses of those resources, we do not believe that the impact would be unreasonable. We do, however, believe that conditions need to be included in the permit in order to mitigate these adverse impacts.

If a permit were granted for the northern eight turbines, this expansion project would produce over 60,000 megawatt-hours of renewable power each year, displacing fossil fuel burning and making a modest but meaningful contribution to the state's statutory goals for wind development. (This amount of power is similar to the amount produced annually by the Pejepscot hydropower dam on the Androscoggin River in Brunswick/Topsham, and relatively similar to the amount expected from the recently constructed Stetson II expansion wind power project.) It is widely recognized that unchecked climate change could negatively affect Maine's environment, economy and people, including in LURC jurisdiction. Although no one project or strategy will be sufficient to reduce Maine's contribution to climate change pollution, NRCM believes Maine must move forward with appropriately sited wind power.

We have concluded that the southern seven turbines (9 – 15) do not meet the legal criteria set forth in 12 M.R.S.A. §685-B(4)(C) and 35-A M.R.S.A. §3452 regarding the

effect of the proposed project on scenic character and related existing uses. Turbines 9 – 15 would be prominently visible from Chain of Ponds and the Arnold Trail, resources of state and national significance, and would change the scenic character from a landscape with minimal evidence of human activity to one with wind turbines that would be extensively visible by recreational paddlers and anglers on Chain of Ponds, and visitors along the Arnold Trail.

Statutory Criteria for Evaluating Scenic Impacts

12 M.R.S.A. §685-B (4)(C) sets forth the legal criteria for determining scenic impacts:

Adequate provision has been made for fitting the proposal harmoniously into the existing natural environment in order to assure there will be no undue adverse effect on existing uses, scenic character, and natural and historic resources in the area likely to be affected by the proposal...

In making a determination under this paragraph, regarding an expedited wind energy development, as defined in Title 35-A, section 3451, subsection 4, the commission shall consider the development's effects on scenic character and existing uses related to scenic character in accordance with Title 35-A, section 3452.

35-A M.R.S.A. §3452 (1) further defines the standard for determining scenic impact as:

...whether the development significantly compromises views from a scenic resource of state or national significance such that the development has an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the scenic resource of state or national significance.

Significance of the Potentially Affected Scenic Areas

The areas of state or national significance that would be affected by the southern seven turbines include the following:¹

- 1. Chain of Ponds** – Chain of Ponds includes 5 connected ponds: Round, Natanic, Long, Bag and Lower Ponds. Chain of Ponds is rated Class 1A in the Wildlands Lake Assessment. Class 1A lakes are the highest rated lakes in the state - those of “statewide significance with two or more outstanding values.” Chain of Ponds has outstanding scenic value “with very dramatic relief.”² Chain of Ponds also has outstanding physical features, fisheries, and wildlife, and significant shore

¹ These resources all meet the criteria set forth in 35-A M.R.S.A. §3451(9).

² Parkin, D. et al. 1989. Maine's Finest Lakes: The Results of the Maine Lakes Study. Maine State Planning Office, Critical Areas Program, Augusta, ME.

character and cultural features. LURC has classified Chain of Ponds as a management class 2 lake that is accessible and undeveloped. Chain of Ponds has significant areas of shore in public ownership (see below) and is used by the public for fishing and paddling.

2. **Chain of Ponds Public Land Unit** – Chain of Ponds Public Land Unit includes 1,041 acres, including mostly the northern and eastern shores of Chain of Ponds. The Bureau of Parks and Lands Management Plan (BPL Management Plan) for this parcel begins: “This *highly scenic* 1,041 acre parcel in Chain of Ponds Township...”[emphasis provided.]³ The management plan continues, quoting the Portland Press Herald outdoor writer, Martin Perry: “There are few places in Maine with as rugged a landscape...Mountain summits and ridges surround the narrow ribbon of water and create a fjord-like setting.” Use of the public land unit includes camping at primitive campsites and a commercial campground, canoeing, kayaking, and fishing. There is also a hiking trail skirting Round Pond. Management priorities for the unit include ensuring “the scenic and primitive nature of the surroundings.” See Attachment A.
3. **Benedict Arnold Trail to Quebec Historic District** – The Arnold Trail is listed on the National Register of Historic Places. The characteristic that makes this section of the trail particularly noteworthy is its nearly pristine and unspoiled condition – a condition that evokes the wilderness experience that the soldiers faced in this region on their march to Quebec.
4. **Crosby Pond** – Crosby Pond is also rated Class 1A in the Wildlands Lakes Assessment because of its outstanding scenic and fisheries values. It also has significant wildlife values. LURC has also designated it a Management Class 2 lake that is accessible and undeveloped.
5. **Arnold Pond** – Arnold Pond is the third resource class 1A lake within 8 miles of the southern seven turbines. It has outstanding scenic and cultural values as well as significant fisheries values. Arnold Pond has been designated a Management Class 4 lake, that is high value, accessible, and developed.
6. **Kibby Stream** – The Maine Rivers Study designated Kibby Stream, a tributary of the Dead River, a Class A stream for its scenic and undeveloped character. The Rivers Study includes tributaries of Class A Rivers (the Dead River) when the tributary “a) possesses natural or recreation values consistent with those of the main river area; b) significantly enhances the overall value of the larger river segment’s resources.” In discussing the scenic value of the Dead River, the Maine Rivers Study notes: “The area above West Forks [which includes Kibby Stream] has a high diversity of views due to variations in landforms, topography and hydrologic features.” The Maine Rivers Study further notes: “The lands

³ Excerpts from Bureau of Parks and Lands Flagstaff Region Management Plan addressing Chain of Ponds, June 12, 2007. See attachment A.

Existing Character of Surrounding Area

As is clear from the descriptions of all the scenic resources of state and national significance in the region, the primary character of this region is its highly scenic undeveloped mountains and forests. The ponds, the stream, and the historic trail are all distinguished because of the very high scenic character of the surrounding area. Recreation in the area (e.g. camping, paddling and fishing) is primarily primitive in character, dependent on the natural scenic character of the surroundings.

In addition, 47 miles of Route 27, between Kingfield and Coburn Gore on the Canadian Border, are one of only 12 designated scenic byways in Maine. This scenic byway runs along the eastern shore of Chain of Ponds. The link from the Department of Transportation's website notes that the section of the byway along the Chain of Ponds includes rock formations "over 400 million years old, and they will provide you with a final taste of *outstanding scenery* and natural studies." [emphasis added.]

Other than Route 27 and adjacent logging roads and a few camps along Chain of Ponds, the only major man-made features in the area are the Kibby 1 wind turbines and their associated road system. Very few of the Kibby 1 turbines and none of the Kibby 1 roads are visible from the areas of state and national significance listed above, except Kibby Stream.

The fact that there is a road like Route 27 in the area does not necessarily mean that the scenic character of the region has already been degraded and needs no further protection. In fact, the existence of the Route 27 scenic byway emphasizes the high scenic quality of the landscape and heightens the scrutiny that should be given to any proposed degradation of scenic character. Maine residents and visitors visit this remote-feeling but accessible area specifically to enjoy the scenic views and to participate in recreational and cultural activities, the high quality experience of which is dependent on the highly scenic setting.

Nor does the fact that there are already turbines in the region lead to the conclusion that additional turbines would not have unreasonable adverse effects. If that were the case, any single wind project could lead to additional wind projects, marching across the landscape, without consideration of any new impacts created by such additional projects on scenic resources of state and national significance.

Expectations of Typical Viewer

The typical viewer of the turbines visible from Chain of Ponds would expect to see undeveloped mountains since that is the characteristic that would draw the viewer to the area, and which is highlighted in both the Wildlands Lakes Assessment and the BPL Management Plan. In fact, typical viewers likely would expect to see a generally natural

forest, given that, according to BPL's Management Plan, the public lands adjacent to the ponds, and others in the immediate region are so steep and hilly that they are not suitable for timber harvesting. Given the distance from major cities and towns, typical viewers would likely expect to see completely dark night skies.

Viewers certainly would expect to see cars and trucks, including logging trucks, passing by on Route 27 and on the logging roads, given that virtually all visitors arrive in the region by using Route 27. Given that there are no significant structures in the region, visitors would not expect to see major man-made structures.

Nature and scope of impacts on users and scenic resources of state and national significance⁴

In evaluating the impact of the project, it is important to think about both the effects of the proposed turbines and the value of the scenic resource and public uses being affected. Because wind turbines are inherently visible features given their size relative to other features on the landscape, it is largely the value of the affected resources and related uses that will distinguish the impacts of one set of wind turbine from another.

Evaluating the scenic impact of a project is not an easily quantifiable exercise. Professional assessments can provide an important perspective using generally accepted and relatively objective standards. However, evaluation of scenic quality and impacts inevitably involves a large degree of subjective judgment, and the perspective of laypersons should also be given strong consideration.

James F. Palmer, who prepared a visual impact analysis for LURC during the Plum Creek proceeding, put it thus:

There are well developed professional procedures for evaluating the elements that are thought to determine scenic quality and to contribute to scenic impacts (e.g. Smardon et al. 1988, USDA Forest Service 1995). These procedures are grounded in professional experience, and have been accepted by the courts (Smardon and Karp, 1993). However the reliability of these procedures is not well-established through empirical evaluation. *What research exists suggests that the reliability of professional assessments is comparable to, but not higher than public assessments of scenic quality.* (Palmer and Hoffman 2001, Ribe et al. 2002).⁵
[Emphasis provided.]

⁴ 35-A M.R.S.A. §3(E) and (F) evaluation criteria read as follows: "E. The extent, nature and duration of potentially affected public uses of the scenic resource of state or national significance and the potential effect of the generating facilities' presence on the public's continued use and enjoyment of the scenic resource of state or national significance; and F. The scope and scale of the potential effect of views of the generating facilities on the scenic resource of state or national significance, including but not limited to issues related to the number and extent of turbines visible from the scenic resource of state or national significance, the distance from scenic resource of state or national significance and the effect of prominent features of the development on the landscape."

⁵ Palmer, James F. et al, A Review of the Potential Visual Effects From Implementing the Proposed Concept Plan for Plum Creek's Lands in the Moosehead Lake Region, August 30, 2007, p. 10.

There are accepted criteria which help guide assessments. The Department of Environmental Protection⁶ sets out three factors to consider in evaluating impact:

- 1) Landscape compatibility – whether the proposed activity differs significantly from its existing surroundings and context from which they are viewed;
- 2) Scale contrast – the size and scope of the proposed activity given its specific location within the viewshed; and
- 3) Spatial dominance – the degree to which an activity dominates the landscape composition.

There is no question that all of the proposed turbines differ significantly from the undeveloped forested ridgeline where they would be located and from the scenic ponds, scenic byway, class A stream and historical trail from which they would be viewed. They are a different color, shape, and form and they would tower above the forest canopy. In addition, the cut and fill areas along the summit road lying on the west side of the ridge (which do not appear in the visual simulations) would result in large areas of light-colored bedrock and boulders which would be in marked contrast to the dark-colored forest. This road would be far more prominent than existing narrower logging roads, which are much less visible and which are rarely if ever constructed on such steep high-elevation slopes.

However, the impacts of the turbines differs significantly in terms of how much the activity dominates the landscape composition, how different the scale contrast is and the resulting impact on public uses of the resources of state and national significance. As Vissering's Appendix 2 Viewshed Analysis Map Detail shows, as proposed, some number of turbines would be visible for about three miles of the length of the Chain of Ponds, including the southern third of Natannis Pond, all of Long Pond, and the western half of Bag Pond. This is approximately one third of the length of Chain of Ponds. However, when you consider only the northern eight turbines, they would be visible from only approximately one mile of the Chain of Ponds: the southern half of Long Pond and the western quarter of Bag Pond. Paddlers and anglers on the pond would see substantially fewer turbines – and none at all from more areas - if only the northern eight were built. [See Attachments B-1 and B-2, NRCM Revised Vissering Photosimulation from Viewpoint 5; and Attachments C-1 and C-2, NRCM Modified Vissering Appendix 2, Viewshed Analysis Map Detail: Chain of Ponds.]

The southern seven turbines are within approximately three miles of the Chain of Ponds, the Chain of Ponds public land unit, and the Arnold Trail. The viewscape as seen from the south end of Long Pond is framed on the northwest by Mount Pisgah and on the southeast by Sisk Mountain. The two peaks are connected by a long ridge, on which the turbines are proposed. [See Vissering's "Pan view from the southern end of Long Pond," Appendix 3, photo 11.] The viewer's eye is drawn upward from the pond by the two peaks. Turbines on the ridge between the two peaks would be squarely in front of the

⁶ Chapter 315: Assessing and Mitigating Impacts to Existing Scenic and Aesthetic Uses. This rule legally applies only to assessing impacts subject to the Natural Resources Protection Act, 38 M.R.S.A. §480-D (1), but its general principles and approach may be helpful in analyzing impacts in this project.

viewer. With only low-lying forest between the viewer and the turbines, the turbines would be clearly and completely visible above the tree line.

The roads associated with the southern seven turbines would likely also have a significant visual impact, although the simulations do not include the impacts of the roads. The road for the seven southern turbines would be located on the west face of the ridge, facing the Chain of Ponds and Route 27. In some places, it appears that the road would cross slopes of up to 50%. In multiple places there would be cut or fill slopes up to and occasionally exceeding 70 vertical feet. These would be highly visible from the ponds. While the applicant indicates that parts of the roads would be revegetated, it is not feasible to revegetate bedrock exposures and large boulder fields.

As is evident from Vissering's simulation from Viewpoint 5, the turbines would be a prominent feature from Long Pond. (See Attachment B-1.) These ponds are primarily used for primitive, natural character-based recreation including paddling, wildlife watching, fishing and camping; they are a place where people go for a sense of solitude and to get away from the human built environment. This experience would be significantly compromised if the seven southern towers were looming directly in front of users. Users would no longer feel like they were in an accessible but remote-feeling area. Rather they would be reminded of the human built environment at all times as they linger to paddle, watch wildlife and fish within view of the turbines. In addition, while nighttime use of the ponds is certainly less common, paddling on a still cloudless night can be a spectacular experience – one that would be severely degraded by prominent flashing red lights. While the applicant did not prepare a visual simulation of the impacts of the lights on the turbines at night, we know from other lakes that even one light at a significant distance can measurably change the ambience of the experience.

Visitors who enjoy the public lands and waters at Chain of Ponds because of their “accessible remoteness” and their sense of naturalness would either have to tolerate this significant compromise of their recreational experience, or choose to go elsewhere.

Visitors are likely not the only thing that will choose to go elsewhere if the southern seven turbines are built. As the Bureau of Parks and Lands notes in their comment #11, wind power projects can have a significant impact on future land conservation projects whose goals are to protect scenic or recreational values in the region. Funds for conservation acquisitions and easements are extremely limited and competition for these funds is high. Factors often considered in choosing among potential projects whose goals are to protect scenic or recreational values are their proximity to existing public lands and the pristine nature of the region. Without the southern seven turbines, it is reasonable to expect that additional conservation purchases might occur in the region and provide further protection for scenic and recreational uses as well as for wildlife habitat because of the existence of the existing highly scenic public lands parcel and the historical significance of the region. However, the seven southern turbines would have a much greater impact on these resources and would degrade the existing natural character of the landscape. These impacts could well drive potential conservation funds to another part of the state.

The user experience of the Arnold Trail would also be significantly compromised. This particular stretch of the Arnold Trail is the area where the wilderness closed in on the troops and they experienced problems resulting from being in the wilderness. Because of the very few changes to the landscape in this area, visitors today can get a good sense of the wilderness that Arnold's men faced. If the experience from this stretch of the Trail is compromised, there is no place for visitors who wish to experience that sense of wilderness along the Arnold Trail to go, since the Trail is fixed on the face of the earth. Unlike campers and paddlers, there is no other place for these users to go.

We are also concerned about the potential impact of the turbines on Arnold Pond. Vissering's April 9, 2010 report leaves us unsure about what turbines would be visible from the pond and the degree of impact. We will await the results of Vissering's further simulations.

We believe that the northern eight turbines cause many fewer adverse impacts to the ponds, public lands and the Arnold Trail. The northern eight turbines are an additional mile further away and thus less dominant on the landscape. They would be visible from a much smaller area of the Chain of Ponds, and would be partially blocked by intervening forests and lower ridges. In addition, the prominent road to the southern seven turbines on the upper west side of the Sisk ridge would be eliminated. It appears from the plan maps that the road in the northern part of the project area would lie primarily on the ridgeline, and would be minimally visible or hidden from view from the Chain of Ponds region. While the northern part of the project would have some impacts on the scenic resources and related recreational uses, we believe those impacts would not significantly compromise the scenic resources or uses and do not rise to the level of "unreasonable adverse effect." If only the northern eight turbines were constructed, we believe there would be *no* visibility from Viewpoints 1, 2, 3 and 4 as identified in Vissering's photosimulations. The key areas of remaining visibility, along Long and Bag Ponds would resemble NRCM's modified photosimulation from Viewpoint 5 in Attachment B-2, which can be contrasted with Vissering's Photosimulation from Viewpoint 5, Attachment B-1.

Proposed Conditions on the Permit to Mitigate Adverse Impacts

We believe that the impacts of the southern seven turbines on scenic resources and related uses so significantly compromise those resources and uses that they cause an unreasonable adverse effect and no permit should be granted for those turbines.

However, the impacts of the northern eight turbines are different. While they would definitely impact the views and recreational uses of Kibby Stream, and some of these turbines would be visible from parts of Chain of Ponds and Arnold and Crosby Ponds, we believe that conditions could be included in a permit so that the impacts would not rise to the level that an amended application for the eight northern turbines should be denied. We believe that a permit for these eight northern turbines should require

conditions that would mitigate the adverse impacts that the turbines would cause on scenic resources of state and national significance and related uses.

Wind turbines, because of their size, will always be visible from somewhere. Because turbines need to be located where there are sufficient wind resources, based on current technology, they typically need to be placed on ridgelines, whether those are low, rolling hills or high-elevation ridges. Therefore, conditions on a permit, including mitigation, can be a valuable tool that may allow wind power development to proceed even in proximity to certain scenic resources of statewide significance.

The fact that turbines would be visible does not in itself lead us to conclude that mitigation must be provided. The state currently lacks a clear, detailed framework for determining when mitigation for scenic impacts should be required as a permit condition, and a standard methodology for establishing a mitigation level. Mitigation has been required as a condition of a permit in previous cases (e.g. Moosehead Lake Concept Plan) even in the absence of any explicit statutory authorization. The lack of a clear mitigation framework for wind projects is not surprising, given the evolving nature of wind development in Maine. Developing such a framework is in Maine's long-term interest and we believe LURC has a key role in that effort. Even if Maine possessed such a framework, it likely would not be entirely formulaic given that the determination of whether or not a project creates an unreasonable adverse impact on scenic resources includes subjective judgments.

We believe there may very well be other circumstances where the impact of turbines on scenic resources, and related uses, of state or national significance within eight miles of the proposed project would be sufficiently minor that no mitigation would be necessary. To our knowledge, neither LURC nor DEP have permitted a wind power project to date with the same level of impacts to a suite of scenic resources as outstanding as those around Chain of Ponds.⁷ In the case of the eight northern turbines in this application, we believe that conditions to mitigate the impacts are needed. Factors that lead us to conclude that mitigation is needed include:

1. The number of scenic resources of state and national significance that would be impacted: Chain of Ponds, Arnold Pond, Crosby Pond, the Chain of Ponds public lands unit, Kibby Stream and the Arnold Trail would all be impacted to some degree by the proposed turbines.
2. The relative value of the resources that would be impacted: Chain of Ponds, and Arnold and Crosby Ponds are not merely scenic resources of state significance. They are resources that have been identified as having "outstanding" scenic values. The public lands unit is described as "highly scenic." Even among scenic resources, these areas have been broadly recognized for their exceptionally high scenic value.

⁷ Although they were not treated consistently by LURC and various third parties, both the Kibby 1 and Stetson wind projects included conservation payments and/or protections of mountain resources that had the effect of either protecting or improving scenic/recreational resources. Neither project had comparable scenic impacts to the current application.

3. The relatively high number and many types of uses that would be impacted: This is an area that has a relatively high level of use, given its distance from population centers. The combination of the scenic byway, the Arnold Trail, the multiple Class 1A ponds with outstanding scenic character and the public land unit in an accessible but undeveloped and relatively remote-feeling area makes this a very attractive destination. Visitor expectations of undeveloped mountains and shorelines are particularly high, given that that is the primary characteristic of the area. A wide variety of visitors to the area will be impacted by the turbines. The experiences of users of the public land unit, including paddlers and anglers on the ponds, historical buffs following the Arnold Trail, tourists exploring the scenic byway, and anglers looking for remote headwater streams would be changed by these turbines. Winter users, including snowmobilers and snowshoers, would also be impacted.
4. The scale of the turbines viewed at a distance of approximately four miles, when combined with the above considerations.

Given the value of the resources and the extent of impacts on the scenic resources and on existing uses related to the scenic character of the scenic resources of state and national significance, we believe that a permit for the northern eight turbines should include as a condition a requirement that the applicant provide appropriate mitigation.

We suggest that the appropriate conditions could include providing funds to protect other scenic resources that are either in the same immediate area, such as purchasing additional public lands along the shoreline of Chain of Ponds or improving the scenic character of existing public lands on Chain of Ponds, or purchasing the development rights on a scenic mountain ridge in the state. Pisgah Mountain or the southern ridge and peak of Sisk Mountain are two possibilities; there are certainly others. Absent a specific proposal for one of the above, we suggest that a fund in the amount of \$100,000 dollars be made available to the Bureau of Public lands to be spent as they determine is most appropriate, consistent with these goals.⁸

Vissering suggests that no mitigation is required because there is no unreasonable or undue adverse impact. This is an incorrect analysis of the law. If there were an undue or unreasonable impact from these eight northern turbines, the application would need to be denied and mitigation would not be relevant. Mitigation is only relevant where the impacts do not rise to an undue or unreasonable adverse level.

Conclusion

Changes in the viewshed that would be caused by the construction of turbines 9 - 15 would significantly compromise the scenic character of the state significant Chain of Ponds and the nationally significant Arnold Trail causing an unreasonable adverse effect on the scenic character and related recreational uses of these areas. We urge LURC to deny a permit for these turbines.

⁸ The figure \$100,000 represents the approximate value of the land area on which the northern eight turbines sit: ½ mile x 1.1 mile, or approximately 350 acres, x \$300/acre. This is one potential method for determining the appropriate amount of mitigation. Other methodologies may also be appropriate.

We believe that an amended application for turbines one through eight would meet the legal requirements and should be granted subject to a condition that requires mitigation for the adverse impacts on scenic resources of state or national significance.

Dated: April 21, 2010

VERIFICATION

Signature of Witness: Catherine B. Johnson

April 21, 2010

Before me appeared Catherine B. Johnson, who being duly sworn, did testify that the foregoing testimony was true and correct to the best of her knowledge and belief.

State of Maine
Kennebec County

NOTARY PUBLIC

ATTACHMENTS

- A. Excerpts from Bureau of Parks and Lands Flagstaff Region Management Plan addressing Chain of Ponds, June 12, 2007.
- B-1. NRCM revised Vissering Photosimulation from Viewpoint 5 showing northern eight turbines and southern seven turbines.
- B-2. NRCM revised Vissering Photosimulation from Viewpoint 5 showing northern eight turbines only.
- C-1. Vissering Appendix 2, Viewshed Analysis Map Detail: Chain of Ponds.
- C-2. NRCM modified Vissering Appendix 2, Viewshed Analysis Map Detail: Chain of Ponds, showing approximate visibility of turbines if southern seven turbines are removed.