



Jami MacNeil
Environmental Specialist III
Bureau of Land Resources
Maine Department of Environmental Protection
28 Tyson Drive
Augusta, ME 04330
By email: Jami.Macneil@Maine.gov

October 5, 2019

Re: NRPA application for a boat ramp and pier, 126 Golden Ridge Road, Alna, ME 04535

Dear Ms. MacNeil,

I am writing to oppose the current application by Jeff Spinney for a Natural Resources Protection Act permit for a boat ramp and pier on the Sheepscot River on tax map R-4, parcel 21A for the following reasons.

Inconsistent with Maine's Outstanding River Designation

The Sheepscot River is a Maine treasure of national significance. The area of the proposed development has been designated as Class AA by the state of Maine. The statute states¹; "Class AA shall be the highest classification and shall be applied to waters which are outstanding natural resources and which should be preserved because of their ecological, social, scenic or recreational importance." The Sheepscot River's reversing falls is a natural barrier to most motorized boats and is a destination for thrill-seeking kayaker's looking to practice their white-water skills. This natural feature along with the fact that all formal and informal access points upstream of the falls on the river are limited to hand-carry boats has defined the social, scenic and recreational attributes of the river by creating an experience of quiet solitude for anglers, paddlers, duck hunters and others recreating on the river. Creating motorized boat access for shared use (25 or more undefined users) at this site would significantly diminish these values and should not be allowed. This permit for shared use is a forever decision. The current owner would manage the access responsibly, but there is no guarantee that future owners would.

To be clear, Midcoast Conservancy supports public access to the river consistent with current uses. Indeed, two of Midcoast Conservancy's preserves provide hand-carry access for boats (e.g. Drucker and Bass Falls) and we have partnered with others to improve public access for hand-carry boats at Head Tide dam in Alna and Coopers Mills in Whitefield. We seek to be part of offering additional opportunities for appropriate public access to the Sheepscot River for residents all along the river.

Risk of Introducing Invasive Aquatic Plants

The state of Maine has recognized that motorized boats along with the trailers they come on carry a significant risk over non-motorized boats for transferring invasive aquatic plants to our pristine lakes and rivers (see attachment A). Since 2008, Maine has been a leader in preventing the spread of invasive plants

¹ 38 M.R.S.A Sections 484 and 485

Clean Water. Thriving Communities. Land for All.



by requiring all motorized boat owners purchase and display Preserve Maine Waters sticker² on their boats. Still, the risk is very real (see attachment B). This proposal for a shared-use boat launch for 25 motorized boats will put an undue risk of transferring invasive plants to the river with no opportunity for the type of boat inspections and education that typically exists at public sites.

At risk of is the degradation by invasive plants on rare plant communities. Within this stretch of the Sheepscot River are 8 rare plants (listed as special concern) and two rare natural communities (see attachments C and D).

Protecting Public and Private Investment

Substantial resources have been dedicated towards the protection and restoration of the Sheepscot River by multiple Federal, State, municipal and private entities including the U.S. Fish and Wildlife Service, NOAA, Maine Dept. of Marine Resources, Maine Outdoor Heritage Fund, Atlantic Salmon Federation, Midcoast Conservancy, multiple municipalities including the towns of Alna and Whitefield, and numerous private organizations. Midcoast Conservancy alone has protected over 6,000 acres of land within the Sheepscot watershed including several miles of frontage between Head Tide Village and Reversing Falls. These undeveloped lands along with other protected lands (see attachment E) are a crucial part of maintaining the river's AA water quality designation and will forever act to filter contaminants, limit erosion, control flooding and provide shade and cooling of the river for cold water fisheries including the endangered Atlantic salmon and all 12 species of migratory fish.

Inconsistent with Alna Shoreland Zoning Ordinance

Given the project is wholly within the Resource Protection District in Alna, we have identified several potential inconsistencies of this project with the municipal ordinance³ that need to be addressed including: whether this project should be considered a commercial use (Land Use table 1, 15-C) given the financial obligation for members to pool their dues to maintain this development (see application attachment 1, paragraph 6); whether or not the use constitutes a "marina" (Land Use table 1, Section 29) as defined in the ordinance and whether or not any portion of the pier, dock, wharf or other structure is a "permanent structure" (Land Use table 1, section 17 b).

We urge the Maine Dept. of Environmental Protection to be part of protecting the tremendous investment, worth millions of dollars that has been spent towards restoring and protecting the Sheepscot River and deny this permit as currently proposed. A boat ramp for personal use only with a smaller, more appropriately sized float system is better suited for this location.

Sincerely,

Jody Jones
Executive Director

² <https://www.maine.gov/dep/water/invasives/invsticker.html>

³ <https://www.alna.maine.gov/ordinances-permits-and-fees-1>



Do your part: Protect Maine waters from invasive plants and animals.

CLEAN plant debris, mud and algae
from all boating and fishing gear
and dispose in trash.

DRAIN live well, bilge water, and
engine water away from waterbody.

DRY any gear that comes into
contact with water.



**Avoid fines by making sure that you
are not transporting aquatic plants.**

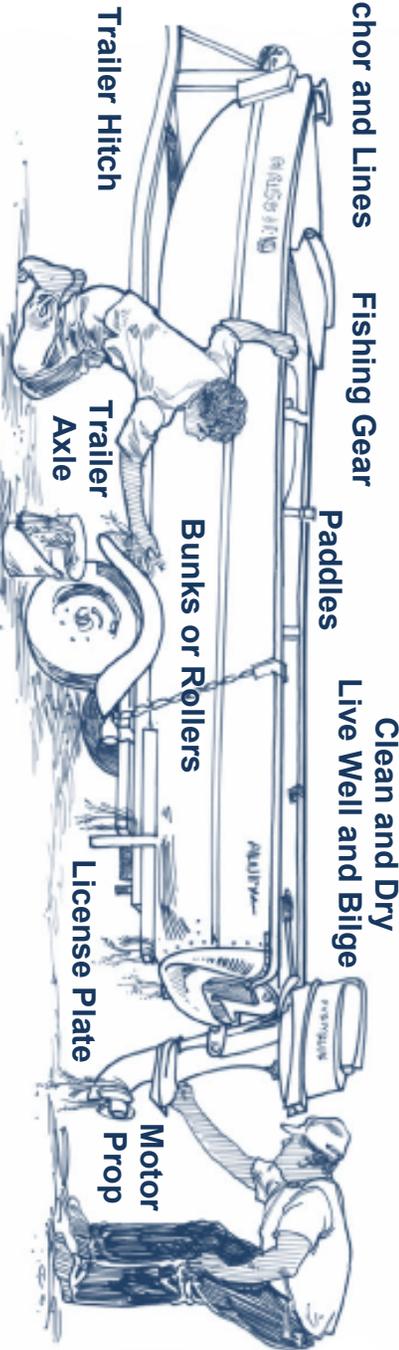
Up to **\$2,500** for transporting **any**
aquatic plant

Up to **\$500** for failing to affix the
invasive species sticker to your
motorized craft
(including seaplanes)

To report a violation



Funds from invasive species sticker sales protect native Maine plants, animals and habitat.



CLEAN boat, trailer, and gear. **DRAIN** and let **DRY**.



**PROTECT MAINE
WATERS**

**STOP AQUATIC
HITCHHIKERS**

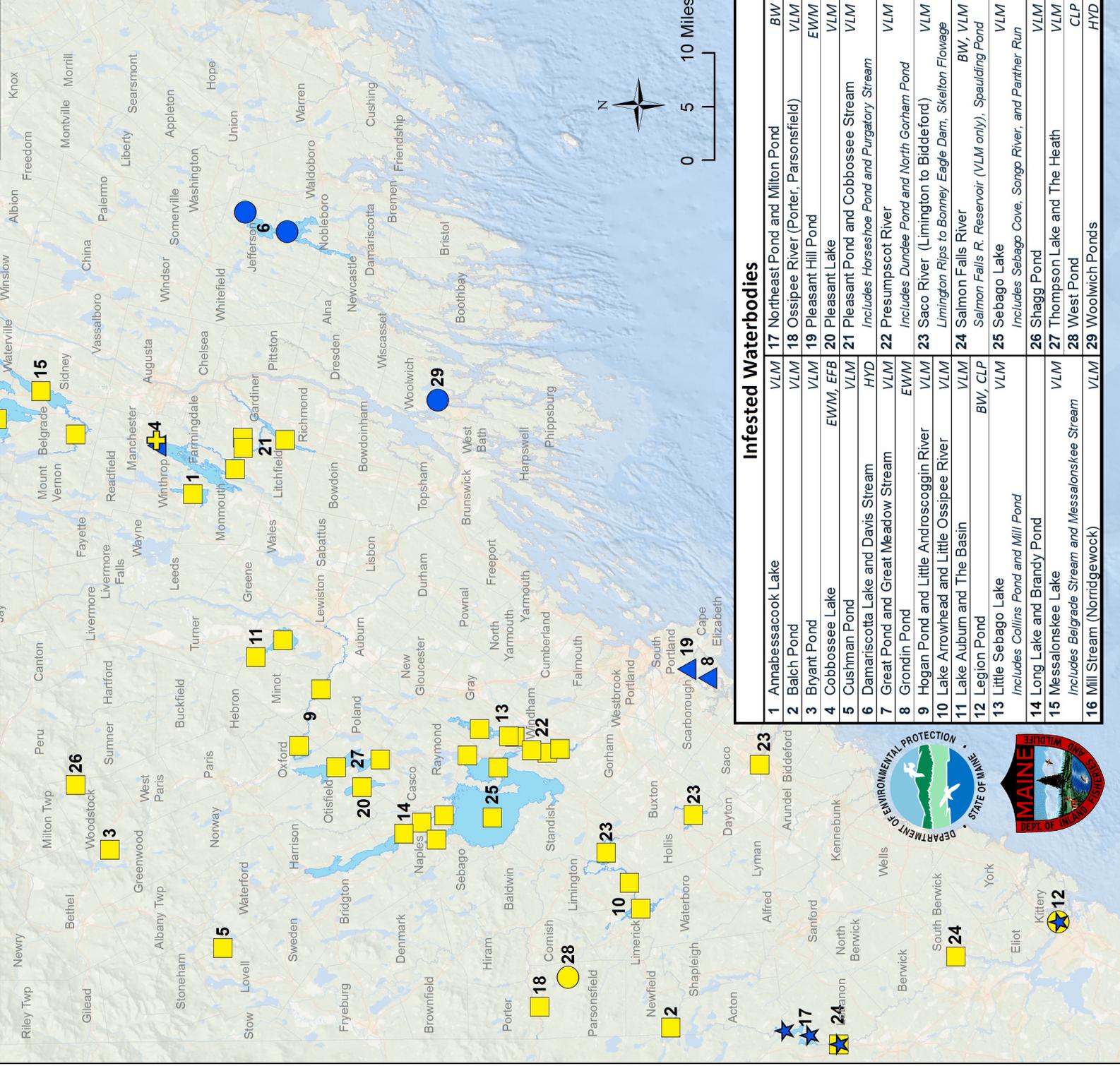


MAINE DEPARTMENT OF
ENVIRONMENTAL PROTECTION
www.maine.gov/dep/water/invasives
2019

Invasive Aquatic Plants

Maine Public Waters, January 2019

- Variable Leaf Milfoil (VLM)
- Brittle waterlily nymph (BW)
(aka European naiad)
- Curly Leaf Pondweed (CLP)
- Eurasian Water Milfoil (EWM)
- European Frog's Bit (EFB)
- Hydrilla (HYD)
- Brittle waterlily nymph (BW)
(aka European naiad)
- Hydrilla (HYD)
- Eurasian Water Milfoil (EWM)



Infested Waterbodies

1 Annabessacook Lake	VLM	17 Northeast Pond and Milton Pond	BW
2 Balch Pond	VLM	18 Ossipee River (Porter, Parsonsfield)	VLM
3 Bryant Pond	VLM	19 Pleasant Hill Pond	EWM
4 Cobossee Lake	EWM, EFB	20 Pleasant Lake	VLM
5 Cushman Pond	VLM	21 Pleasant Pond and Cobossee Stream	VLM
6 Damariscotta Lake and Davis Stream	HYD	22 Presumpscot River	VLM
7 Great Pond and Great Meadow Stream	VLM	Includes Dundee Pond and North Gorham Pond	
8 Grondin Pond	EWM	23 Saco River (Limington to Biddeford)	VLM
9 Hogan Pond and Little Androscoggin River	VLM	Includes Limington Rips to Bonney Eagle Dam, Skelton Flowage	
10 Lake Arrowhead and Little Ossipee River	VLM	24 Salmon Falls River	BW, VLM
11 Lake Auburn and The Basin	VLM	Includes Salmon Falls R. Reservoir (VLM only), Spaulding Pond	
12 Legion Pond	BW, CLP	25 Sebago Lake	VLM
13 Little Sebago Lake	VLM	Includes Sebago Cove, Songo River, and Panther Run	
Includes Collins Pond and Mill Pond		26 Shagg Pond	VLM
14 Long Lake and Brandy Pond	VLM	27 Thompson Lake and The Heath	VLM
15 Messalonskee Lake	VLM	28 West Pond	CLP
Includes Belgrade Stream and Messalonskee Stream		29 Woolwich Ponds	HYD
16 Mill Stream (Norridgewock)	VLM		

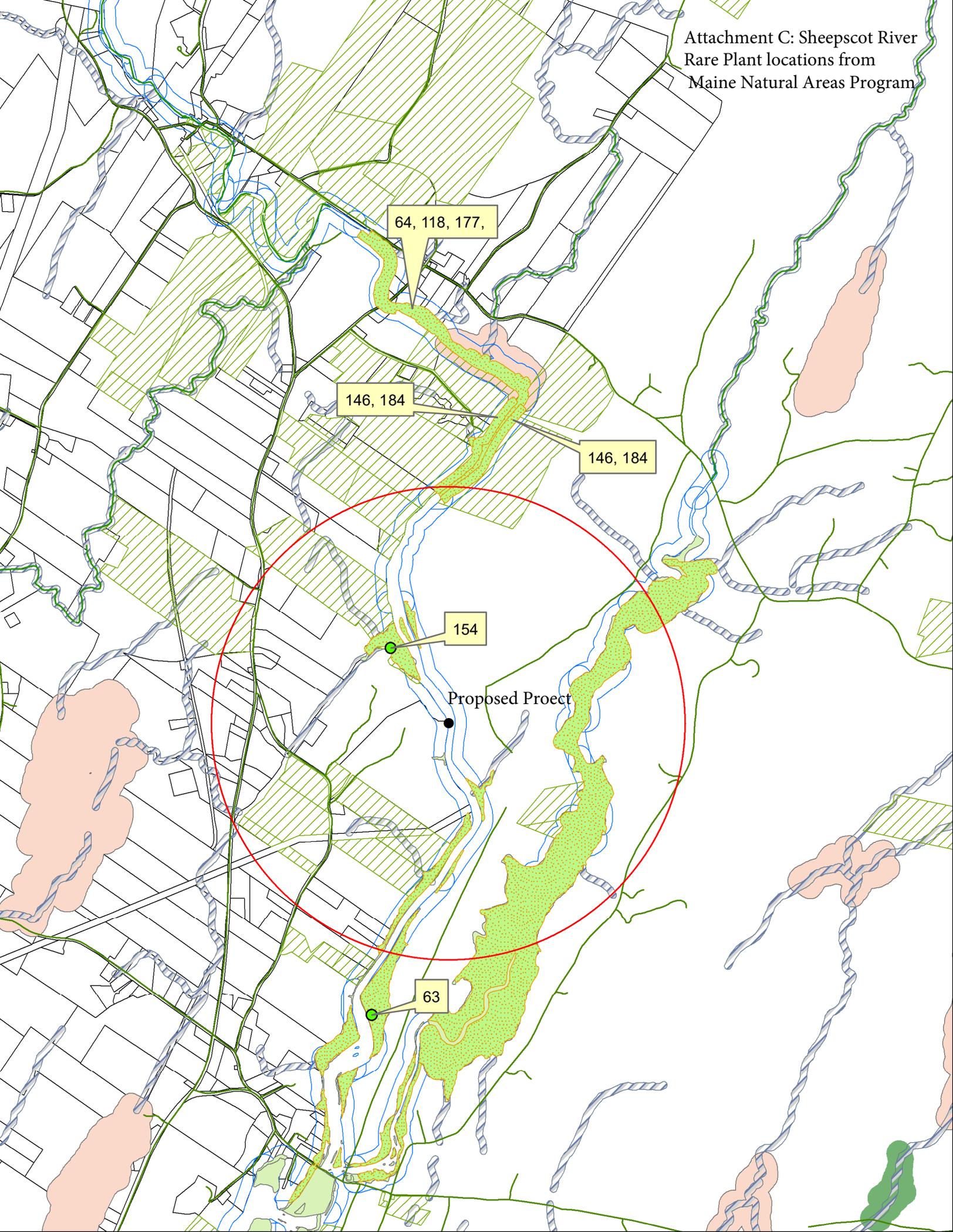


Find out more: www.maine.gov/dep/water/invasives

Maine Lakes with known Invasive Aquatic Species

MIDAS	LAKENAME	Species
9961	Annabessacook Lake	Variable-leaf milfoil
3748	Auburn Lake	Variable-leaf milfoil
3898	Balch & Stump Ponds	Variable-leaf milfoil
9685	Bay of Naples Lake	Variable-leaf milfoil
3464	Bryant Pond	Variable-leaf milfoil
5236	Cobboosee lake	Eurasian watermilfoil, Frogs Bit
3728	Collins Pond	Variable-leaf milfoil
3224	Cushman Pond	Variable-leaf milfoil
5400	Damariscotta Lake	Hydrilla
3732	Dundee Pond	Variable-leaf milfoil
3922	Great East Lake	Variable-leaf milfoil (eradicated)
5274	Great Pond	Variable-leaf milfoil
	Grondin Pond	Eurasian water-milfoil
3770	Hogan Pond	Variable-leaf milfoil
9715	Lake Arrowhead	Variable-leaf milfoil
3714	Little Sebago Lake	Variable-leaf milfoil
5280	Messalonskee Lake	Variable-leaf milfoil
3762	Middle Range Pond	Variable-leaf milfoil (eradicated)
3726	Mill Pond	Variable-leaf milfoil
155	Milton Pond	European naiad
3876	Northeast Pond	European naiad
3388	Parker Pond	Variable-leaf milfoil (eradicated)
3940	Pickerel Pond	Hydrilla
6436	Pleasant Hill Pond	Eurasian water milfoil
3446	Pleasant Lake	Variable-leaf milfoil
5254	Pleasant Pond	Variable-leaf milfoil
5352	Salmon Pond	Eurasian water milfoil (eradicated)
5786	Sebago Cove	Variable-leaf milfoil
5786	Sebago Lake	Variable-leaf milfoil
5786	Sebago Lake Basin	Variable-leaf milfoil
3470	Shagg Pond	Variable-leaf milfoil
3872	Spaulding Pond	Variable-leaf milfoil, European naiad
71	The Basin	Variable-leaf milfoil
3444	The Heath	Variable-leaf milfoil
3444	Thompson Lake	Variable-leaf milfoil
5254	Upper Pleasant Pond	Variable-leaf milfoil
3186	West Pond	Curly-leaf pondweed

Attachment C: Sheepscot River
Rare Plant locations from
Maine Natural Areas Program



Attachment D: Rare Plants of the Lower Sheepscot River

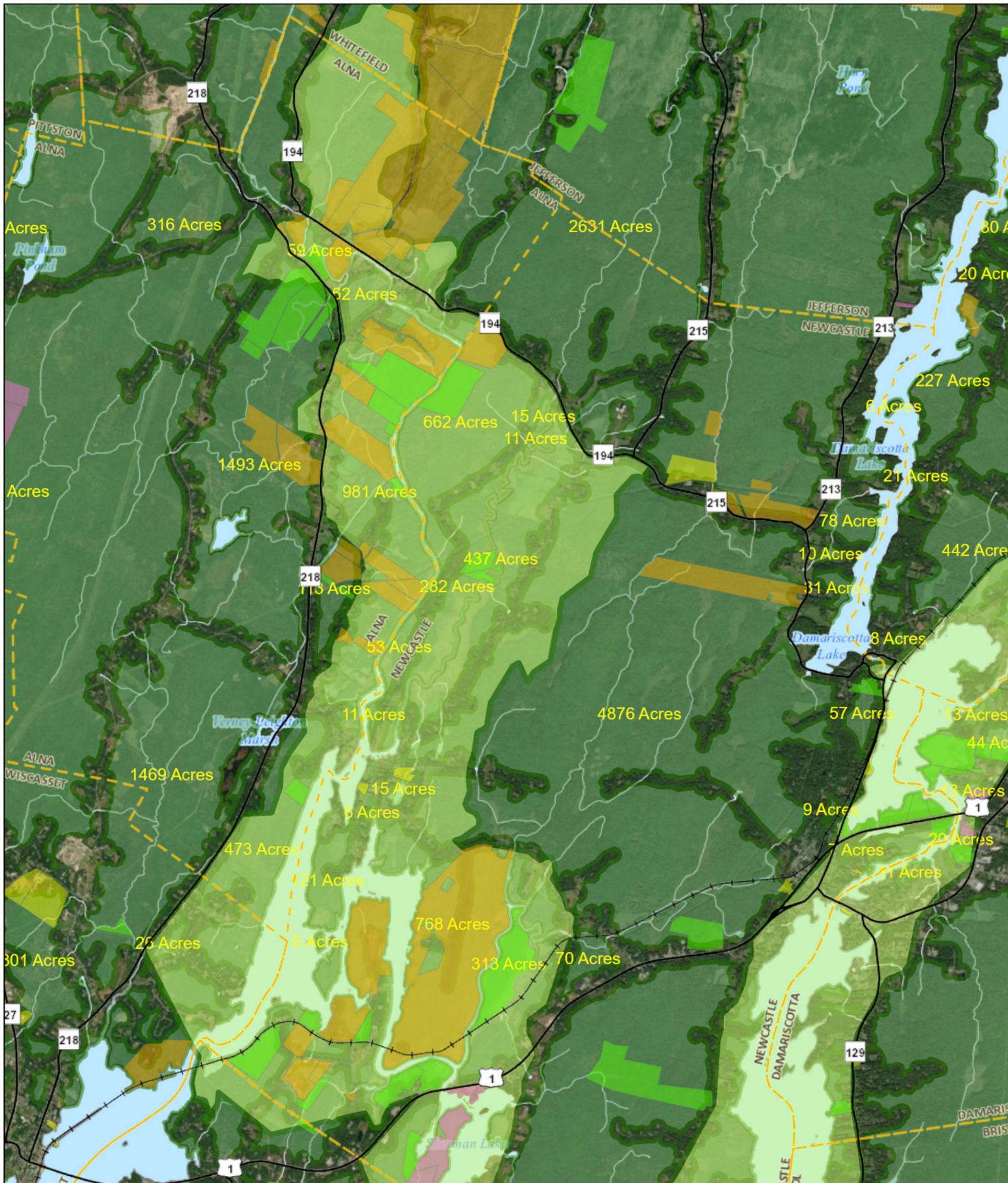
Source: Maine Natural Areas Program

OBJECTID	SNAME	SCOMNAME	LAST_OBS_D	G RANK	S RANK	SPROT	EORANK	FIRST_OBS	SURVEY_DAT
63	Agalinis maritima	Saltmarsh False-foxglove	1990-08-21	G5	S3	Species of Special Concern	H - Historical	1966-08-15	1990-08-21
64	Sagittaria montevidensis ssp. spongiosa	Spongy-leaved Arrowhead	2012-08-14	G5T4	S3	Species of Special Concern	B - Good estimated viability	1984	2012-08-14
118	Bidens hyperborea	Estuary Bur-marigold	2012-08-14	G4	S3	Species of Special Concern	B - Good estimated viability	1983	2012-08-14
146	Limosella australis	Mudwort	1998-08-31	G4G5	S3	Species of Special Concern	C - Fair estimated viability	1959-08-14	1998-08-31
154	Zannichellia palustris	Horned Pondweed	1998-08-31	G5	S2	Species of Special Concern	B - Good estimated viability	1998-08-31	1998-08-31
169	Agalinis maritima	Saltmarsh False-foxglove	2011-06-21	G5	S3	Species of Special Concern	A - Excellent estimated viability	1990-07-27	2011-06-21
177	Eriocaulon parkeri	Parker's Pipewort	2009-08-27	G3	S3	Species of Special Concern	A - Excellent estimated viability	1922	2009-08-27
184	Crassula aquatica	Pygmyweed	1985-09-08	G5	S2S3	Species of Special Concern	H - Historical	1985-09-08	2009-08-27
294	Brackish tidal marsh	Brackish Tidal Marsh	2011-06-21	GNR	S3	Natural Community	B - Good estimated viability	1999-08-20	2011-06-21
296	Mixed graminoid - forb saltmarsh	Mixed Saltmarsh	2011-09-27	G5	S3	Natural Community	BC - Good or fair estimated viability	2011-09-27	2011-09-27

Attachment D: Rare Plants of the Lower Sheepscot River
Source: Maine Natural Areas Program

OBJECTID	HABITAT	ACRES
63	Tidal wetland (non-forested, wetland)	0.12052810000
64	Tidal wetland (non-forested, wetland)	67.96869276000
118	Tidal wetland (non-forested, wetland)	54.39652068000
146	Tidal wetland (non-forested, wetland)	33.84567269000
154	Tidal wetland (non-forested, wetland)	0.12052810000
169	Tidal wetland (non-forested, wetland)	24.67834444000
177	Tidal wetland (non-forested, wetland)	55.82328734000
184	Open water (non-forested, wetland)	23.91716364000
294	Tidal wetland (non-forested, wetland)	547.57594635000
296	Tidal wetland (non-forested, wetland)	366.85912994000

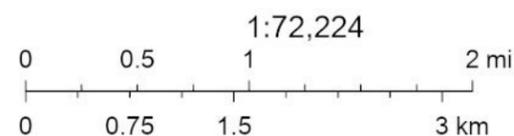
Beginning With Habitat



September 19, 2019

conserved3

- Municipal
- Private
- State
- conserved2
- focus
- undev



BwH
 Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community