

**DOWNEAST WIND  
RESPONSE TO DEP PEER REVIEW AND STAFF COMMENTS  
October 20, 2021**

The following is a response to the Review of the Downeast Wind Visual Impact Assessment prepared by James F. Palmer, Scenic Quality Consultants, dated July 31, 2021. This memo also elaborates on the virtual presentation that Downeast Wind gave to DEP staff on September 1, 2021.

The Great Heath is a much different type of resource from recreational trails, and scenic lakes, and historic sites that are more typically evaluated in visual impact assessments (VIAs) for wind power projects. We believe that visiting the site and evaluating visibility from the Pleasant River is critical to understanding both the natural resources involved and the potential impact of Project visibility. To that end we developed a series of photographs and simulations from the Pleasant River and are including those with this supplemental submission to provide a more complete sense of the resource and Project visibility. We also direct the reviewer to the extensive collection of context photographs included with the VIA (presented in Appendix C: Study Area Photographs) for a better understanding of the resource and the surrounding landscape.

TJD&A believes the following conclusions in Palmer's review are inaccurate and that the information, summarized here and in our prior submission, supports a contrary or in some instances modified conclusion.

1. Erroneous reading of WEA §3451.9.
2. Use of the BLM Scenic Quality Evaluation Criteria and the responses of two survey respondents to assign the Great Heath a significance rating of Medium-High.
3. The conclusion that the surrounding landscape character is visually in character with the Great Heath and justifies a high rating based on this criterion.
4. Assumption that the remote character and low use level is an indication of high expectations from visitors to the Great Heath.
5. Assumption that the 'low use' of the Great Heath means that the Project's potential impact on the extent, nature and duration of use at the Great Heath is Medium-High.
6. Ratings that are inconsistent with previous evaluations completed for other wind energy projects in Maine.

**The above rebuttal points are detailed below:**

# 1 CONCLUSION THAT THE GREAT HEATH IS A SRSNS

## 1.1 Section 3.1: Palmer concludes that the scenic resource classification specified in the Maine Wind Energy Act (WEA) §3451.9.A accounts for “*other comparable natural or cultural features*” (pages 4-7).

In Section 3.1, Palmer inaccurately states *A national natural landmark, federally designated wilderness area or other comparable outstanding natural and cultural feature, such as the Orono Bog or Meddybemps Heath* allows for “*other comparable natural or cultural features*” to be considered Scenic Resources of State or National Significance (pages 4-7).

Palmer is mistaken in the use of the conjunction ‘or’ between natural and cultural features. The correct word in the WEA is ‘and’, which means that to be considered a comparable resource must have both natural features and cultural features that are considered outstanding.

The underlying question here is whether the Great Heath qualifies as a SRSNS under the WEA §3451.9. A. While there is a lack of certainty in this definition as to what ‘other’ areas qualify, it does seem to require that the feature must be a) outstanding, and b) a feature that is recognized for both its natural and cultural attributes.

It is unclear why the Wind Energy Act includes the **Orono Bog** as an example, since it is one of Maine’s National Natural Landmarks. It is also highly regarded as a recreational and educational resource in the Orono area, and thus would qualify as an outstanding cultural feature under this section of the WEA.

The inclusion of **Meddybemps Heath** in the definition raises the same question: does it have both natural and cultural features that are considered outstanding. Meddybemps Heath is a Focus Area of Statewide Ecological Significance. At just over 2,500 acres, Meddybemps Heath is the second largest domed bog ecosystem in the Eastern Coastal and Eastern Interior regions; Great Heath is the largest.<sup>1</sup> Thus it would appear to meet the outstanding natural features test. (It is instructive to note that the Focus Area description makes no mention of any scenic value present at the Meddybemps Heath.)

Is the Meddybemps Heath of significant cultural value? From November 2012 to April 2014 the Abbe Museum in Bar Harbor mounted an exhibition on the Passamaquoddy settlement on Meddybemps Lake at its outlet to the Dennys River. Native Americans have lived on the lake for at least 8,600 years. The Passamaquoddy people have named this site N'tolonapemk, which in Passamaquoddy means, "Our Relatives' Place." This important place lives on today in their oral history and traditional stories. Archaeologists have known about the site since the 1960s, but only recently has its historic and scientific importance become more widely understood through archaeological research.

The exhibit can be found on the Abbe Museum blog<sup>2</sup> and includes detailed accounts of the archaeological work that uncovered the story of the Passamaquoddy, the tools that were found there, and the stories that have been told.

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<sup>1</sup> [https://www.maine.gov/dacf/mnap/focusarea/meddybemps\\_heath\\_focus\\_area.pdf](https://www.maine.gov/dacf/mnap/focusarea/meddybemps_heath_focus_area.pdf) accessed 09.27.2021.

<sup>2</sup> <https://static1.squarespace.com/static/56a8c7b05a5668f743c485b2/t/58da5b4b725e25e4e3ffecaf/1490705295422/N'tolonapemk+Our+Relatives+Place+exhibit.pdf> accessed 09.27.2021.

Included in the exhibit are several maps of the region that include the Meddybemps Heath, which is adjacent to N'tolonapemk. A panel in the exhibit entitled “The environment” notes the significance of the Heath:

*“The setting of N'tolonapemk is notable for its strategic location near the outlet of Meddybemps Lake at the beginning of the Dennys River. The nearby Meddybemps Heath, Staples Fen and numerous other wetlands and forests provide a wealth of animal and plant resources for Native Americans living at the site...Analysis of burned animal bones and burned plant remains recovered from the many hearth and pit features excavated at the site suggest the Native people living at N'tolonapemk practiced a hunter/fisher/gatherer subsistence strategy, utilizing a broad spectrum of plants and animals from the surrounding wetlands, forests and the adjacent river and lake.”*

From its association with N'tolonapemk, Meddybemps Heath can be considered of outstanding cultural significance. Thus, with the combination of both natural and cultural features, the Meddybemps Heath can be considered a SRSNS.

While the Great Heath is of Statewide Significance due to its scientific merits, there is no indication of any comparable cultural significance associated with it that would raise it to the level of being a SRSNS.

## **1.2 Section 5.2: Palmer finds “The surrounding area is visually in character with the Great Heath, resulting in a High rating” (page 13).**

For the reasons set forth in our initial assessment, we believe the more accurate rating for the character of the surrounding area is Medium. The Great Heath landscape is characterized by poorly drained, relatively flat terrain, with open areas of 2.5-to-3-foot-high peat land vegetation, interspersed with pockets of mixed deciduous and coniferous trees. The Great Heath encompasses an unpatterned stream drainage fen, an unpatterned open basin fen, and a level bog. While it does have distinctive ecological features, it lacks the physical characteristics – such as pronounced topographic changes or notable landforms – that are typically associated with places of high scenic quality. The photograph on the lower left shows a typical view of the Great Heath. The photograph on the lower right shows a view of the meandering Pleasant River that runs through the Great Heath.



Much of the landscape surrounding the Great Heath is comprised of blueberry barrens, which lack the topographic relief, water features, and vegetation typically associated with high-quality scenic landscapes. The barrens are a heavily managed commercial landscape with supporting infrastructure. In addition, some of the area surrounding the Great Heath had been used as a military bombing range. The photographs on the following page illustrate these uses near the Great Heath: lower left shows a former military bombing range; lower right shows typical commercial blueberry barrens.



Palmer acknowledges this in Section 5.2 of his peer review, yet still assigns a rating of high to the visual character of the surrounding area. It is difficult to imagine that anyone would visit the commercial fields surrounding the Great Heath and conclude that it rates a ‘high’ for scenic character. It is also difficult to reconcile Palmer’s conclusion that the surrounding commercial blueberry fields have high scenic value when the area surrounding the Bigelow Preserve, evaluated by Palmer, was rated as Medium-High.<sup>3</sup>

Palmer seems to base his rating on the potential impact that a wind turbine would have on views from the Great Heath. While there is no doubt that some of the turbines would be highly visible from portions of the Great Heath, that is not the criteria that should be evaluated in Section 5.2.

## **2 Determination That the Scenic Value of The Great Heath Is Between Medium and High**

The most significant area of disagreement with Palmer’s review is his conclusion that scenic value of the Great Heath is between Medium and High. In accordance with Ch. 382.3.I, that conclusion is based on the significance of the resource, the existing character of the surrounding area, and the expectations of the typical user. Each of these factors is discussed below; the overwhelming evidence indicates that the overall value of the Great Heath, taking into account these three factors, is Low.

### **2.1 Section 5.1: Palmer finds “the significance of the Great Heath as a SRSNS is Medium-High” (page 12).**

Palmer relies on the BLM Scenic Quality Evaluation Criteria and the responses of two survey respondents to assign the Great Heath a significance rating of Medium-High.

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<sup>3</sup> Palmer, James F. Review of the Highland Wind Project Visual Impact Assessment. April 11, 2011.

Both Palmer and TJD&A evaluated the scenic quality using the BLM rating criteria. TJD&A arrived at a score of 11, which is a Class C scenic quality, while Palmer gave it a score of 16, which is a Class B. From there he determined that the scenic quality was Medium-High. We disagreed on the number of points assigned to Vegetation (JP: 4; TJD&A: 3), Color (JP: 3; TJD&A:1); Scarcity (JP: 5; TJD&A: 3). These are all somewhat subjective evaluation criteria and should be made by someone in the field. The BLM Evaluation Criteria (a portion of which is shown below) assigns a score of 1 to 5, depending upon the quality of the factor.

**Vegetation.** As seen by the context photographs, vegetation within the Great Heath, while of significant ecological value, is relatively consistent, with some variety along the riparian zones.

- 1: Little or no variety of contrast in vegetation.
3. Some variety of vegetation, but only one or two major types.
5. A variety of vegetation types as expressed in interesting forms, textures, and patterns.

**Color.** The context photographs and photosimulations demonstrate that the color variations are subtle and the tones found there are muted.

- 1: Subtle color variations, contrast, or interest; generally mute tones.
3. Some intensity of variety of colors and contrast of the soil, rock and vegetation, but not a dominant scenic element.
5. Rich color combinations, variety or vivid color; or pleasing contrasts in the soil, rock, vegetation, water or snow fields.

**Scarcity.** While the Great Heath is memorable from an ecological perspective, the landscape is typical of the meandering streams and wetlands found in the region.

- 1: Interesting within its setting, but fairly common within the region.
3. Distinctive, though somewhat similar to others within the region.
5. One of a kind; or unusually memorable, or very rare within region. Consistent chance for exceptional wildlife or wildflower viewing, etc.

In addition to the BLM rating criteria, TJD&A went through each of the regulatory criteria under 382.3.B to support its overall assessment of scenic significance.<sup>4</sup>

Palmer does not evaluate each of the Chapter 382.3.B criteria, but he does bolster his argument by the two survey responses where respondents rated the aesthetic appeal as either a 5 or a 7 on a 1-7-point scale. It is important to note that these responses were not the result of an intercept survey implemented in a manner that provides a reliable indicator of public perception of scenic quality or the impact of project visibility on the user experience. For example, the responses came from written questionnaires left in a box at the Ell Meadow Road boat launch. Although both persons responded to the question on aesthetic appeal of the Great Heath, neither responded to the questions on the impact of a wind power project on the recreational experience or the impact of project visibility on use and enjoyment of the resource. Moreover, the limited sample size of only two responses does not allow one to draw any meaningful conclusions as to scenic quality or the impact of project visibility on use and enjoyment of the Great Heath. As Palmer himself has pointed out in previous work, that limited number of surveys is not sufficient to establish a pattern. For example, with the Weaver Wind project, Palmer discounted limited responses (7) by reporting:

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<sup>4</sup> Terrence J. DeWan & Associates. Supplement to Downeast Wind Project Visual Impact Assessment. Great Heath Visual Assessment. July 2021.

*“The intercept survey provides the only documented data about the extent, nature and duration of public uses of the two SRSNS that will be most affected by the Weaver Wind Project. However, its usefulness is limited by the small sample size and the restriction to the “shoulder-season” between peak summer and fall color. This is a problem that other intercept surveys conducted for wind energy permit applications have had.”<sup>5</sup>*

TJD&A believes that the rating of scenic quality must be based on more objective criteria typically applied by experts. Accordingly, in addition to the BLM assessment above, we also evaluated the Great Heath using the Scenic Inventory Evaluation Form from the Scenic Assessment Handbook prepared for the Maine State Planning Office.<sup>6</sup> This evaluation determined that the Great Heath was of Local Significance, having received a total score of 42.

<b>SCENIC INVENTORY EVALUATION FORM</b>				
Location <u>GREAT HEATH</u>			Date _____	
SI	SC	IP	INDICATORS	COMMENTS
			1. Landform	
0			Elevation	No appreciable topography.
0			Slope	Basically flat landscape.
6			2. Open Land	> 5 ac with unobstructed views.
0			3. Shoreline Configuration	No shoreline, no configuration.
3			4. Scenic Features	GH as a feature within foreground.
			5. Scenic Quality of Water	
6			Duration of View	Numerous short views from the Pleasant River.
6			Type of Water	Small waterbody (Pleasant River).
3			Quality of Horizon	Closed horizon with little vertical interest.
			Indicators Present	
24			<b>DESKTOP SUBTOTAL</b>	
			6. Landscape Character	
3			Land Use	Blueberry harvesting has minimal effect on scenic quality
0			Roadside Characteristics	Roadsides have no effect on scenic quality
3			Settlement Characteristics	Settlement characteristics have minimal effect on scenic quality.
6			7. Vegetation	Vegetation has a positive effect on scenic quality.
6			8. Composition & Effect	Landscape composition is generally positive.
18			<b>FIELD EVALUATION</b>	
42			<b>TOTAL SCORE</b>	

**Local Significance.** Areas that score in the 30's and 40' are generally of local (i.e., town-wide) significance. While these areas may help define the community's characteristic landscape, they are unlikely to attract visitors from outside the immediate locale for their scenic value alone.

**Scenic Inventory Evaluation Form from the Maine State Planning Office Scenic Assessment Handbook**

<sup>5</sup> Palmer, James F. Adequacy Review of the Weaver Wind Project Visual Impact Assessment. May 5, 2015.

<sup>6</sup> DeWan, Terrence J. Scenic Assessment Handbook. State Planning Office, Maine Coastal Program. October 2008. The Handbook is a 'how-to' guide for using the State Planning Office's scenic inventory methodology to identify, evaluate, and document scenic resources and to identify scenic viewpoints of state or national significance for purposes of Title 35-A MRSA Ch. 34-A (Wind Power Law).

For the reasons described in our initial assessment, and supplemented herein, we believe that scenic significance of the Great Heath is low.

## **2.2 Section 5.3: Palmer finds “The expectations of a viewer in the Great Heath are Medium-High” (page 13).**

Palmer indicates that the remote character and low use level is an indication of high expectations from visitors to the Great Heath. For the reasons set forth in our initial assessment, we believe the more accurate rating for the character of the surrounding area is Medium.

Palmer states that *“the Great Heath is a wild area without obvious influence from people, indicating a High evaluation. However, scenic value is not a primary reason for the Ecological Reserve (or federal wilderness) designation, which suggests lowering expectations”* when he assigns a Medium-High rating for viewer expectations.

Ch. 382.3(D) provides a useful metric for this criterion. The first applies to SRSNS that are valued for their “setting in a naturally scenic landscape.” This photograph of the East Branch Penobscot River is representative of a place that is valued for its setting in a natural scenic landscape (due to the inherent complexity in vegetation, topography, and water features). While this is a specific place, there are countless other locations in Maine that draw people by virtue of their scenic characteristics.



The second metric in Ch. 382.3(D) applies to SRSNS that qualify for reasons not primarily related to its scenic value. The example given is historic sites that are listed on the National Register of Historic Places due to reasons unassociated with their scenic character. The sole basis for the Great Heath being considered a SRSNS relates to its ecological characteristics. We are not aware of any evidence that the Great Heath, to the extent it qualifies as a SRSNS, does so due to scenic considerations. Thus, even if it does have scenic quality, it does not qualify as a SRSNS on the basis of any scenic considerations and therefore in accordance with Ch. 382.3.D(2), viewer expectations should be considered low. The two photographs on the following page show the Great Heath from the Pleasant River, from which most members of the public would experience the Great Heath. The photos illustrate the lack of particularly

scenic landforms, vegetation, or water features that are characteristic of scenic resources of state or national significance.



There is no indication (other than the results from two survey respondents) that the Great Heath is valued for its setting in a naturally scenic landscape. The 'setting' (or land surrounding the Great Heath) in this case is highly cultivated/managed blueberry barrens that may not be considered a naturally scenic landscape. It seems clear from reading Chapter 382 that the second criteria should apply, i.e., if it qualifies as a SRSNS it is for reasons unassociated with its scenic character.



Palmer bases his evaluation by saying it is a wild area without obvious influence from people. If the place were valued for its scenic character, one would reasonably expect the Great Heath to have more than an occasional visitor. One would also expect the place to be mentioned on-line, in tourism guides, and in other similar publications as a DownEast scenic destination.

In Section 7.1 on page 16, Palmer asks, “Does it matter whether a SRSNS is designated in part for its scenic quality?” In Section 7.2, he then references 382.3(B)(2) which requires, as a partial test of significance: “If a property is designated as an SRSNS due to its listing on the National Register of Historic Places, evidence regarding the consideration of the scenic character or uses related to the scenic character of the property as factors in the listing process.” He then asks: “Should this principle be extended to NNL and federally designated wilderness areas? Scenic quality is not a primary consideration in their designation either.” We believe that the second criteria in Ch. 382.3(D) (discussed above) answers his question. This is clearly a place that may qualify for reasons not primarily related to its scenic value. Therefore, viewer expectations should be considered Low.<sup>7</sup>

### **2.3 Palmer is providing inconsistent rating evaluations in his ratings.**

Over the years Palmer has identified many waterbodies that have risen to the level of SRSNS. These are based on an evaluation of the visual characteristics of topography, vegetation, water features, and cultural attributes. As noted, the Great Heath has minimal topography, fairly uniform vegetation, no water bodies (the Pleasant River is arguably not part of the Great Heath; even if it was, it is not rated for scenic quality), and no cultural attributes.

The table on the following page shows Palmer’s evaluation of the scenic significance of Great Ponds that were reviewed as part of the Bowers wind energy project. All the lakes and ponds were rated as either Significant or Outstanding in the Maine Wildland Lakes Assessment. The rating of medium-high that Palmer gave to the scenic value of the Great Heath is inconsistent with the evaluation of these notable waterbodies (evaluated in column A). Similarly, the evaluation of high for the character of the area surrounding the Great Heath is inconsistent with the ratings found in column B. It is imperative to have consistency throughout the peer review process.

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<sup>7</sup> Palmer’s conclusion that viewer expectations are Medium-High places the Great Heath on par with areas that are by consensus considered highly scenic, such as Flagstaff Lake. In his review of the Highland Wind Project, Palmer writes “It is assumed that viewer expectations for scenic quality are generally high for users of Flagstaff Lake. However, there is some evidence that scenic quality may be less important to people engaged in fishing or motor boating as compared to those engaged in hiking or nature study (Palmer 1999). Its rating is Medium.”

Scenic Resources of State or National Significance	Scenic Impact Evaluation Criteria							Overall Scenic Impact
	A	B	C	D	E.1	E.2	F	
<b>Great Ponds</b>								
Bottle Lake	Low	Medium	Medium	Low	Med-High	Medium	Low	Medium
Duck Lake	Low	Medium	Medium	Low	Medium	Medium	Medium	Medium
Horseshoe Lake	Low	Medium	Medium	Low	Medium	None	None	None
Junior Lake	Low-Med	Medium	Med-High	Low	Medium	Medium	Medium	Medium
Keg Lake	Low	Medium	Medium	Low	Medium	Medium	Low-Med.	Medium
Lombard Lake	Low-Med	Medium	Medium	Low	Medium	None	None	None
Norway Lake	Low-Med	Medium	Medium	Low	Medium	None	None	None
Pleasant Lake	Low-Med	Medium	Med-High	Low	Medium	Medium	High-Med.	Medium
Pug Lake/Junior Bay	Medium	Medium	Medium	Low	Medium	Low	Low	Low +
Scraggly Lake	Low-Med	Medium	Med-High	Low	Medium	Medium	Medium	Medium
Shaw Lake	Low-Med	Medium	Medium	Low	Medium	Medium	Medium	Medium
Sysladobsis Lake	Low-Med	Medium	Medium	Low	Medium	Medium	Low-Med.	Medium
Upper Sysladobsis Lake	Low-Med	Medium	Medium	Low	Medium	None	None	None
West Musquash Lake	Low-Med	Medium	Medium	Low	Medium	None	None	None

**Notes:** The Evaluation Criteria are: (A) Significance of resource, (B) Character of surrounding area, (C) Typical viewer expectation, (D) Development's purpose and context, (E.1) Extent, nature and duration of uses, (E.2) Effect on continued use and enjoyment, and (F) Scope and scale of project views.

### 3 The Significance of Project Visibility

Chapter 382.3.I requires the Department to take into account the purpose and context of the project; the extent, nature and duration of public uses and the potential effect of the project on that public use and enjoyment; the scope and scale of potential impacts; and cumulative impacts to determine whether the impacts are low, medium or high. TJD&A disagrees with Palmer's conclusion that the extent, nature and duration of public use and impact of project visibility on that use is Medium-High. This factor is discussed below.

#### 3.1 Section 5.5: Palmer finds the extent, nature and duration of public use of the Great Heath to be Medium-High (page 14).

Palmer improperly uses the low use of the Great Heath to determine the extent, nature, and duration of public use at the Great Heath to be Medium-High.

In support of his medium-high evaluation of the extent, nature, and duration of public use of the Great Heath, Palmer states that **"The activities of the two surveyed users agree with what might be expected. Users engaged in these activities may have a varying sensitivity to the surrounding scenery, but often it would be Medium-High"** (page 14).

There is no indication in the literature, field investigations, or use surveys that the Great Heath receives any more than occasional use at any time of the year. Palmer bases his determination of Medium-High solely on the two users who completed questionnaires left in a box.

In Section 7.3 (page 16), Palmer states *"Chapter 382.3(F) states that just because no one visits a location should not necessarily lessen its importance. Some places are important because they are set aside to be remote. Evidence of the extent, nature and duration of existing public uses of the SRSNS where the natural, undeveloped character of the area surrounding the SNSRS is an important part of the enjoyment*

*of the activity. For such uses, low use levels will not necessarily be found to decrease the significance of potential impacts to existing uses related to scenic character.”*

Palmer seems to equate the Great Heath with LUPC-designated Remote Ponds that are without road access or buildings within a half-mile of the high-water mark. Remote ponds have low use because of the inherent difficulty with access. While the Great Heath has public access, it can be challenging, but not in the same way as remote ponds are.

Chapter 382.3(F) requires the Department to consider all relevant evidence pertaining to public use and enjoyment, including:

1. *Evidence of the extent, nature, and duration of existing public use where the SRSNS’s scenic character is an important part of the enjoyment of the activity.* As noted earlier, public use is exceedingly low. Fishing in the Pleasant River is one of the primary activities. There is scant evidence that the quality of the scenery of the Great Heath is an important part of the enjoyment of fishing on the river.
2. *Evidence of the extent, nature, and duration of existing public use of the SRSNS **where the natural, undeveloped character of the area surrounding the SRSNS is an important part of the enjoyment of the activity.** (Emphasis added.)* As noted above, the area surrounding the Great Heath is privately held blueberry barrens whose owners actively discourage public use. The surrounding land is not totally natural or undeveloped, as evidenced by the road network and active management and harvesting activities. There is no evidence that the character of the surrounding area contributes at all to the enjoyment of the Great Heath.
3. *Evidence of tourism-related businesses or recreational clubs or organizations whose purpose or viability is related to the public use and enjoyment of the Great Heath.* There is no evidence that Maine Guides or other tourism-related businesses or clubs depend on the Great Heath as part of their purpose or livelihood.

Palmer concludes by noting “*Chapter 382.3(F) generalized this consideration of ‘low use’ to all SRSNS, but is silent on whether low use should be the result of management decisions, or simply because it is not a place people choose to visit.*”

Visitor use levels are low in the Great Heath for several reasons:

- **Management decisions on the part of surrounding landowners**, as evidenced by the signage shown in the photograph on the following page.
- **Management decisions (or lack of decisions) on the part of the State:** lack of directional signage, lack of facilities for water access, lack of reasonable accommodations for camping or hiking.
- **Personal Choice.** People choose to visit areas that are publicized and recognized for their scenic and/or recreational value. There is virtually no publicity about the Great Heath that describes the experience one might have. Quite the opposite, as recognized in the AMC River Guide.



*No trespassing sign on Ell Meadow Road heading toward the river access point.*

### **3.2 Evaluation of Project Visibility from the River and Primitive Campsite**

DEP staff requested additional information on Project visibility from the Pleasant River and the informal campsite adjacent to the Pleasant River within the Great Heath. The following narrative provides TJD&A's observation about the river, access points, the experience of being on the river, and the campsite, and is designed to accompany Exhibit A: Great Heath / Pleasant River Downeast Wind Visual Assessment Review.

**Pleasant River Access.** Due to the lack of trails through the dense vegetation that characterizes the Great Heath, the only feasible way to access and experience the heath is from the Pleasant River. The river runs through the Great Heath for approximately 7 miles. Access to the Pleasant River is limited. In the state GIS database, there are three carry-in access points located within the study area. One of the access points is the Tibbetstown Road, which is a carry-in access point located approximately 4 miles south of the Great Heath, and below Saco Falls—negating any prospect of paddling the upper sections from this put-in. Two of these locations allow for access to the Pleasant River near the vicinity of the Great Heath: Schoodic Road and Ell Meadow Road. In May of 2021, TJD&A staff paddled 7 miles of the Pleasant River from the Schoodic Road access down to the southern boundary of the Great Heath. TJDA continued another 1.9 miles down to the Ell Meadow Road access to disembark. The north to south direction followed the strong spring current and was seen as the most enjoyable and likely most popular way to paddle the river.

The river was accessed during the springtime, which affords a narrow window in which the water level is high due to snowmelt, and leaf-off conditions are still present, conditions that would allow for maximum potential Project visibility. After the leaves emerge and the water level begins to decrease, riparian vegetation creates increasingly more foreground visual screening from the river. With lower water levels, beaver dams and other blockages that have to be portaged become more numerous, making river trips in late spring, summer, and fall more difficult.

At Schoodic Road, the water access location is at a small tributary stream that leads to the Pleasant River. There is no designated parking area or signage to either direct visitors to the site or identify it as an access point. At Ell Meadow Road, the access point is at the end of the road, with no designated parking area, limited space to turn around, and no signage designating the access point or even positively identifying Ell Meadow Road. The site is often inundated with water creating a mud hazard for vehicles attempting to unload close to the river. An image of the Ell Meadow Road launch point is provided as P32 in Appendix C: Study Area Photographs submitted with the Downeast Wind VIA. For either access point the visitor would need to know the network of unmarked roads very well and probably still use GPS support to navigate the series of unlabeled forks in the roads. Neither access point can be reached without passing by at least one “No Trespassing” sign.

**River Experience.** The river is characterized by a narrow meandering channel that is flanked by tall grasses, 10 to 20-foot woody riparian vegetation, and 30 to 40-foot wetland-tolerant trees. The meandering nature of the river and the intermittent pattern of riparian vegetation provides a constantly changing and varied visual experience with only occasional openings allowing Project visibility. Visibility is typically limited to several hundred feet from most locations. The distance to the nearest visible turbines from openings on the river is typically at least one mile.

**Diagrammatic Overlays.** Views from the river are provided on pages 7 through 49 of Exhibit A: Great Heath / Pleasant River Downeast Wind Visual Assessment Review and from the river’s edge in Photosimulation 2 provided in Exhibit B: Great Heath Photosimulations.

During field study of Project visibility from the Pleasant River, photographs were taken as often as possible to document areas on the river where view corridors were present beyond the heavily filtered foreground and midground landscape. Exhibit A illustrates the constantly changing river viewshed as one travels north to south, with a focus on places with distant views regardless of potential Project visibility.

The images and overlays illustrate the intermittent nature of the viewing experience, with brief filtered views of the Project, often occurring after long stretches of no visibility. There are a limited number of areas in the southern part of the Great Heath where the absence of dense foreground and midground vegetation allows for a greater range of Project visibility. (See Pages 43-48 (Loc 20-22) in Exhibit A and Photosimulation 2 in Exhibit B for examples.)

The images in Exhibits A and B reveal the contrast in visibility between being on the heath or on the river. For someone on the river, visibility is a function of the riparian vegetation, viewer elevation on the water, orientation on the meandering river channel, and season of the year. Even in areas with a higher degree of Project visibility and less foreground and midground vegetation, the existing riparian vegetation and viewer elevation is effective in screening parts of the Project.

**Primitive Campsite.** There is one primitive campsite located along the bank of the Pleasant River, as noted in the Delorme Atlas and Gazetteer. There is no physical marking on site and none of the amenities that are typically found in Maine campsites. Its overgrown state is evidence of infrequent use and lack of maintenance. Though the site is located approximately 1 mile from the nearest turbine, there will be minimal Project visibility due to foreground vegetation to the west and midground vegetation to the northeast. The campsite is oriented toward the Pleasant River in the opposite direction of the turbines. Views from the campsite are provided on pages 26-34 of Exhibit A.

**Conclusion.** Views of the project from the Pleasant River over the Great Heath will be possible, but only at limited times of the year and from limited locations. Reasonable access to the Great Heath via the Pleasant River is only practical during those times of the year when water levels are high enough to ride over the beaver dams and other obstacles along the route. Users paddling downstream encounter fleeting views of the project from occasional gaps in the riparian vegetation that characterize the shoreline. Paddlers encounter a continuously changing landscape, due to the meandering nature of the river which would require turning around to see the turbines in many locations.