

Comprehensive Land Use Plan Revision

**LURC Staff Summary
of Public Hearing Comments**

November 20, 2009

LURC staff have prepared a summary of the range of oral and written comments submitted by members of the public on the draft Comprehensive Land Use Plan by the Commission's established October 28, 2009 filing deadline. This document is neither a comprehensive summary of the 452 written comments and 48 oral statements gathered as part of this public hearing, nor a substitute for the Commission's review of the complete public comment record. Rather, this document presents the key themes that the staff identified in reviewing these public comments, and serves as a basis for feedback that the staff wishes to gather from the Commission prior to preparing a final draft of the Plan for the Commission's consideration.

Copies of all public comments and the audio files of all public hearing sessions have been provided to the Commission and are available to members of the public upon request.

Comments on Topics of Relevance to Multiple Sections of the Plan

BALANCING PUBLIC AND PRIVATE INTERESTS	
Theme	Comment
The Plan is balanced.	<ul style="list-style-type: none"> The draft Plan addresses the challenges of fair planning and regulation of private lands that have had so many public expectations put upon them, while trying to retain the values that make the region unique. Overall, it is a balanced Plan. Continue the tradition of a fair balance for those whose livelihoods depend on those resources and those who use the land and waterways for recreation.
The concept of 'balance' needs to be strengthened in the Plan.	<ul style="list-style-type: none"> Strengthen the concept of 'balance' in the Plan. The most important place to strengthen balance is on page 1-2: "The Commission's jurisdiction will exemplify a balance between its unique principal values and promotion of a sustainable pattern of multiple land uses." The Plan should be revised to reflect the need to achieve a balance between the principal values. The Plan does not live up to themes identified by the working group: finding balance between maintaining landowner value and protecting public interests, and having the CLUP recognize the value of economic opportunity in the UT. The Plan too frequently focuses on protection of only those values that relate to natural resources or undeveloped characteristics. This problem can be cured by emphasizing the concept of 'balance'. Examples: include the objective of balance in the vision, include promotion of economic vitality in the goals, get rid of the implication that all natural resources must be protected against all impacts. The goals must speak to balance, to the residents and property owners as well as to the people of Maine, and to the preservation of the value of private property.

RESIDENTS AND LANDOWNERS	
Theme	Comment
The Plan must do more to recognize the interests of residents and landowners.	<ul style="list-style-type: none"> The Plan must recognize the interests of residents, landowners and local economies. In chapter 1 – there are several places where 'residents and property owners' in the jurisdiction should be mentioned rather than just 'the people of Maine'. The 10 million acres of land that LURC is exercising its control over does not belong to the people of Maine, it belongs to the landowners who live, work, recreate and pay taxes on it. Their rights and interests must be front and center on any document that seeks to govern their land. The change to LURC's statutory Purpose and Scope that the jurisdiction should be managed to "benefit property owners and residents of the unorganized and deorganized townships of the State" does not appear to be codified in the Plan. The Plan should be revised to better recognize the interest of residents, landowners, and local economies as a primary stakeholder. The Plan does not recognize the importance of land use planning for the benefit of property owners as evidenced in the missing paragraph: "For lands found to be appropriate for increased protection, the Commission, working with landowners, shall promote appropriate conservation measures. Measures used to advance this policy shall be adopted only with the agreement of affected landowners." There is no reference to the owners and residents of the UT in the vision and it is unclear whether they are mentioned anywhere else in the document. However, the residents of the State of Maine and their visitors are mentioned repeatedly. Wherever a statement is made regarding specific interests, residents and landowners in the UT should be mentioned along with the people of the State of Maine.

PROPERTY RIGHTS AND LAND VALUE	
Theme	Comment
The Plan bypasses property rights.	<ul style="list-style-type: none"> The Plan bypasses certain key property rights. The Plan eliminates any safeguard or rights of the property owner. On Page 7-2 of the Implementation Chapter, the following paragraph from the 1997 Plan has been deleted and needs to be added back in: "For lands found to be appropriate for increased protection, the Commission, working with landowners, shall promote appropriate conservation measures – regulatory and nonregulatory. Measures used to advance this policy shall be adopted only with the agreement of affected landowners." The Plan is silent on the individual rights of property owners. These rights need to be addressed in a respectful fashion.
Land values should not drive the Commission's planning process.	<ul style="list-style-type: none"> Perceived land values or perceived effects to land values should not drive the Commission's planning process. The Legislature charged the Commission with regulating Maine's North Woods for the public interest, not for the financial interest of a few landowners.
The Plan puts more emphasis on respecting property rights than in previous drafts.	<ul style="list-style-type: none"> The Plan puts more emphasis on respecting the landowners and their property rights.

TERMINOLOGY AND TONE OF THE PLAN	
Theme	Comment
Support the continued use of the terms 'remoteness,' 'primitive recreation' and 'wildlands.'	<ul style="list-style-type: none"> Words like remote, primitive and wilderness have appeared in every CLUP since 1976 – they should remain in the Plan. Remoteness and primitive recreational pursuits are key values to be protected. Since 1967, when the first legislation was crafted to create what would ultimately become the Land use Regulation Commission in 1971, words like wildlands, primitive, and remote have been used to describe the 10.5 million acres of Maine's North Woods. Those words accurately described the jurisdiction 40 years ago and they accurately describe the jurisdiction in 2008.
The Plan should define more terms.	<ul style="list-style-type: none"> Define the terms that you use in the plan (e.g., right size, traditional, primitive, present infrastructure)
The Plan has a preservationist tone.	<ul style="list-style-type: none"> The tone of the Plan is a concern. For example, five out of eight pictures on the cover are scenic – one related to primitive pursuits, one is of a harvest operation, and one is of a sporting camp. This ratio is representative of the overall content and tone of the document and illustrates why the Plan falls short as a guiding document for privately owned lands. Rather than guiding land use, the Plan paints a picture of crisis in the jurisdiction, then advocates for restriction. The draft Plan is overburdened with language that seeks to protect and preserve the jurisdiction as an undeveloped, natural or remote place best suited to traditional or primitive pursuits. This preservationist tone reveals a vision and goals more appropriate to a strategic plan for state or national park than a land use plan for private property.

ECONOMIC DEVELOPMENT	
Theme	Comment
The Plan is an obstacle to economic development.	<ul style="list-style-type: none"> The Plan will become a hindrance to economic development. The Plan will have unintended consequence of limiting opportunity in a poor area of the State. The Plan is a step backwards and will be very costly to property owners. The broad goals of the Commission may have the unintended consequence of continuing the decline of service center communities as their economies transition to a greater reliance on a recreational economy and less on a manufacturing based economy. Primitive recreational activities do not generate sufficient revenues to support these service center communities. However, primitive and non-intensive recreational activities play a role in the jurisdiction and are important activities and can co-exist with other more intensive activities that are likely to play a more significant role in the economies of fringe communities. The jurisdiction needs a balance of economic growth, including forestry, agriculture, commercial and residential development. The Plan recognizes this, but continues to treat economic development as a threat rather than an opportunity.

ECONOMIC DEVELOPMENT, <i>continued</i>	
Theme	Comment
The Plan should do more to broaden the Commission's charge with regard to economic development.	<ul style="list-style-type: none"> LURC has not necessarily taken broader economic development as its primary task. However, the Plan can be used as a tool to broaden that charge and provide greater development direction in the future. The Plan should contain a stronger reliance on the goals, policies, and projects of the economic development councils and districts.
The Plan must balance competing needs and focus on sustainable economic development.	<ul style="list-style-type: none"> A balance must be struck between economic activity, recreational pursuits, public access, and environmental concerns while at the same time residents must be able to continue to make a living from natural resources as they have traditionally. A balanced approach to sustainable, community minded economic development is necessary. in the wild character of Maine is at risk. The Brookings report made cogent argument that these values may be the heart and soul of Maine's economic future.
The Plan should focus on sound planning as is the Commission's charge.	<ul style="list-style-type: none"> The Commission is a regulatory agency empowered to provide sound planning, zoning and subdivision control. LURC was not intended to be, nor has it ever been, an economic development agency. Nowhere in the purpose and scope, or the lengthy legislative history of the agency's creation, is the Commission considered an entity charged with promoting economic development. Attempting to reinterpret the intent of the purpose and scope to focus on promoting economic vitality is a misinterpretation of the recent legislation. A more accurate interpretation of the purpose and scope is that the economic vitality of the region is dependent on sound planning, zoning and subdivision control.

CONSERVATION EFFORTS	
Theme	Comment
The Plan should do more to acknowledge the significant contributions and impacts of land conservation.	<ul style="list-style-type: none"> The first two pages in Chapter 1 provide a broad overview and repeatedly mention the desirability of maintaining unbroken tracts of forest land but never once mention the reality that millions of LURC jurisdiction acres have already been protected from development by working forest easements voluntarily created by private land owners. Please insert language in the first two pages that details what has already been accomplished through working forest easements. Prominently discuss, acknowledge and account for the significant contributions and impacts of land conservation. Conservation easements are an issue that should be mentioned in more than scattered sentences. New owners have created opportunities and should be portrayed as more than just a potential threat for increased development. Recognize and accept the consequences of all the conservation that has taken place in the jurisdiction that removes millions of acres from development. These huge conservation areas should have calmed the Plan's focus on removing areas from development and gaining expanded and unreasonable control over its location. The Plan is written as if this conservation never happened. LURC's continued misuse of the statement that 84% of the jurisdiction is available to residential development is an abuse of the public's trust. The Plan should better recognize the efforts that have already been made to meet the public's expectations of access and no-development through voluntarily setting aside of those rights through the use of conservation easements.
The Plan appropriately articulates LURC's support of conservation.	<ul style="list-style-type: none"> Support protection of the jurisdiction's unique values by encouraging long term conservation in places where the principal values of the jurisdiction are most vulnerable to degradation and in areas identified by the Commission as least appropriate for development.
The Plan should not rely on conservation easements as a substitute for sound planning.	<ul style="list-style-type: none"> Privately negotiated easements can be an important tool in planning, but they are not a substitute for sound comprehensive prospective planning. Because easements are typically privately negotiated, LURC and the public have no control over the location or terms of easements. The location and terms of easements can vary widely and may or may not reflect the Commission's vision for the jurisdiction. The Commission cannot rely on private easements to provide publically beneficial sound planning.

NATIONAL PARK / NATURAL HERITAGE SITE	
Theme	Comment
The North Maine Woods are appropriate for a National Park.	<ul style="list-style-type: none"> • The North Maine Woods are as appropriate for a National Park as other areas in the US. • Maine should be declared a Natural Heritage Site.

STYLISTIC AND PROCEDURAL COMMENTS	
Theme	Comment
Edit the whole Plan for consistency.	<ul style="list-style-type: none"> • There are numerous sections within the Plan that are contradictory. Edit the document so that it is presented in a more uniform voice.
Create a more timely Plan revision process.	<ul style="list-style-type: none"> • Consider in your new Plan a section that is devoted to creating a CLUP revision process that is much timelier and less resource dependent.
The Commission should reflect on the Plum Creek decision and other project outcomes.	<ul style="list-style-type: none"> • Before any new development is allowed, LURC needs to study the concrete impact of Plum Creek's development. LURC should declare a moratorium on any new projects until a study of those impacts, both positive and negative, is completed.
The Plan needs to be clear and specific.	<ul style="list-style-type: none"> • Every section of the Plan is wholly lacking in any description of the desired scale of activities. Such descriptions should be clear and specific.
The Plan should describe a dispute resolution process.	<ul style="list-style-type: none"> • The regulated in the Jurisdiction basically have no fair and equitable dispute resolution process. Such a process should be defined and included in the Plan.

Comments on Topics of Relevance to Specific Sections of the Plan

CHAPTER 1 – VISION, GOALS AND POLICIES	
Theme	Comment
Support the vision and principal values as drafted in the Plan.	<ul style="list-style-type: none"> • The effort to preserve recreational opportunities and high value natural resources and to protect the wilderness character of the forest is appreciated. • Values of primitive recreation are essential. • Critical aspects of preserving resources, primitiveness and remoteness are most important. • Make the principles of the Plan permanent. • Pleased that ecological values, remoteness and primitive recreational pursuits are key values. • Recognition of remoteness and the value of primitive pursuits is a very important part of the Plan. • Protect the remote character and recreation that make this region unique.
The principal values will damage economic opportunity.	<ul style="list-style-type: none"> • The Commission's priority must be to improve the environment for economic development. The principal values which will damage the economic opportunity of landowners and residents of the region and place at risk the unique relationship between private landowners and the public are not acceptable.
Remoteness should not be a principal value.	<ul style="list-style-type: none"> • The Plan should be revised to remove the weight on 'remoteness' as a principal value to be preserved at all costs. Remoteness is not a value – it is simply a characteristic. • The inference that remoteness is a principal value is not accurate. It is a characteristic but not a value that has to be maintained.
Modify goal 2 to be more inclusive of different types of recreation.	<ul style="list-style-type: none"> • Goal 2 should be restated to replace the phrase "non-intensive outdoor recreation" with "multiple use outdoor recreation" or simply eliminate the word "non-intensive."
Add a fourth goal that speaks to 'private property' and 'economic vitality'.	<ul style="list-style-type: none"> • A new Goal 4 should be added, which states: "The Commission, recognizing that much of the jurisdiction is privately held and that continued access is vitally important to the economic viability of many businesses and to the many visitors to the jurisdiction, will work closely with landowners to assure that access is available in the future." • A new Goal 4 should be added, which states: "Foster a regulatory environment that maintains the value of private property, encourages the well-planned and well-managed multiple use of land and resources, and promotes the economic vitality of the jurisdiction."

CHAPTER 4 – DEVELOPMENT: DATA TRENDS	
Theme	Comment
LURC should collect better land use data.	<ul style="list-style-type: none"> • Consider a new commitment to the collection of land use data. It is apparent that the Commission has less than adequate data, which leads to more political divide. • The issue of how development data was analyzed and the conclusions that were made from the analysis does not seem to have been resolved.
Development is a threat to the North Woods and the Plan should address this issue.	<ul style="list-style-type: none"> • Development is a major threat to the future of Maine's North Woods. • A dispersing residential development pattern will harm the unique values of the unorganized territories and could result in a loss of Maine's quality of place, erosion of the unique economic and cultural role of the jurisdiction, and degradation of many high value natural resources. • Sprawl is the greatest development threat. Sprawl fragments parcels. Through the construction of power lines, roads, and house lots, sprawl can disrupt wildlife migration pathways, fragment their populations so that reproduction is affected, or diminish the territory necessary for feeding and forage. Fragmentation makes any forest management strategy increasingly difficult. Development may make public access more difficult. • Development will destroy the multiple use of land. It will gut the Maine Guide and sustainable logging professions. • The maintenance of roads and other infrastructure in the context of a sprawled development scenario is unaffordable.

CHAPTER 4 – DEVELOPMENT: DATA TRENDS, *continued*

Theme	Comment
<p>Development is not uncontrolled, is not a threat, and the Plan should calm such rhetoric.</p>	<ul style="list-style-type: none"> • Development is not uncontrolled in the unorganized territories. LURC has a well-working process to plan for and manage appropriate development in the unorganized territories and should be continued. • The Plan continues to paint a negative and untrue picture of uncontrolled development. The Plan should acknowledge that development as measured by building permits for new dwelling has been declining for years, and that most of it concurs along the rim within a mile of paved roads, organized towns and residential facilities. The average rate of development in the interior is one dwelling per township per decade. The current rate is lower, and is even lower when a few hot spots are removed. Rhetoric that characterizes this as a problem is not constructive and has a negative impact on landowner value. Since timberland investments returns are strongly driven by appreciation, this is a very important point. • The Plan creates an atmosphere of crisis where none exists. Sections of the Plan are written to support the unfounded belief that development must be absolutely controlled. • Calm the rhetoric around 'uncontrolled development' in the jurisdiction. LURC has sufficient control and guidance over development. Landowners need the flexibility to locate buildings and create parcels on an occasional basis. All statements regarding subdivision exemptions should be removed or qualified to recognize that they have been authorized by the legislature. • Some of the language in chapter 4 has an alarmist tone, drawing conclusions based on data that are admittedly flawed and inadequate. Even the flawed data indicate that development has declined in the interior over the last 20 years. The existing tools LURC uses to guide development in conjunction with conservation measures are working. Development is occurring in proximity to existing urban areas and very little is happening in the interior. Inflammatory statements about uncontrolled development or language that dwells on the negative impacts of development need to be tempered and balanced. • As it relates to the interior, the language in the Plan is still one of preservation not conservation. Development is almost always spoken of as endeavors that must be squelched at worst and controlled at best. It is almost never described as an economic driver.
<p>Changes in landownership increase pressure for development and this is an issue that the Plan should acknowledge.</p>	<ul style="list-style-type: none"> • Associated with the big change in land ownership is increasing pressure for unprecedented large scale development. The threat appears to be four-season developments, sporadic and scattered springing up at the most prized sites. • Land ownership patterns in northern Maine have changed from corporations with a long term vested interest in their holding to ones whose only interest is short term profit. The apparent new value of Maine's wildlands is for housing and resorts. • The recent transfer of ownership to much of Maine's North Woods from long term timber ownership to real estate investment trusts and the Plum Creek plan make it clear that development is a major threat to maintaining ecological health of the North Maine Woods, public recreation, and sustainable forestry.
<p>Statements in the Plan about changes in landownership and implications for land use patterns are inaccurate.</p>	<ul style="list-style-type: none"> • Statements that imply or outright claim that TIMOs and REITs inherently have a short term outlook with respect to land management and are more profit-motivated than industrial owners are not accurate. It is important to note that the industrial landowners of the recent past also had shareholders who demanded positive returns. The notion that somehow the investment owner is more beholden to shareholders than the corporate landowner is absurd. In fact, the investment objectives of many timber-holding funds expressly include sustainable, long term forest management, while the primary objective of the industrial landowner is to use the forest as feedstock for its mills. Many timber funds have a 10-20 year lifespan. This is virtually identical to that of the ownership periods of the industrial landowners. Looking beyond the deeded ownership reveals a pattern of land use that is in direct contrast to the claims that rapid ownership changes necessarily result in the loss of forestland, and that the new investor-owner has vastly different objectives than the industrial owner. The primary investment objective for TIMOs is typically a long-term, predictable, low-risk, low-yield investment. For this reason, it is the value of the forest at the end of the fund cycle that is of primary importance. During the life of the fund, timber revenues and conservation easement sales provide modest revenue streams, but the long-term capital gain of land value appreciation is key to the investment strategy. Over-regulation of this land causing a loss of value will necessarily mean that the TIMO will need to find other ways to enhance the land value to make up for this loss. • The Plan appears to put a negative slant on what are referred to as new landowners such as TIMOs and REITS. This is an unfair conclusion. A better differentiation would be to base the discussion on landowner objectives.

CHAPTER 4 – DEVELOPMENT: DATA TRENDS, <i>continued</i>	
Theme	Comment
LURC has limited ability to guide development and the Plan needs to address this issue.	<ul style="list-style-type: none"> The Commission's conclusion that LURC currently has limited ability to guide development to appropriate places and that the new CLUP needs to address these limitations is accurate.

CHAPTER 4 – DEVELOPMENT: GUIDING DEVELOPMENT	
Theme	Comment
Efforts to identify areas most appropriate for development (near existing communities) and identify areas least appropriate for development should remain in the Plan.	<ul style="list-style-type: none"> The effort to identify areas least appropriate for development in the Plan is supported. The Plan does well to concentrate development near existing communities. Provisions in the Plan to guide development toward existing settlements and infrastructure and to protect water quality, natural resources, habitat, outdoor recreation resources and the cherished remote, near pristine character of the North Woods are strongly supported. It is important that LURC will identify areas least appropriate for development. A lightly populated state like Maine needs to be careful to concentrate its development in particular areas because all of the infrastructure that goes along with sprawl is unaffordable. Reviewing the best locations for future growth may make more sense in an area near existing major roads even if little development is present while discouraging development where new roads and infrastructure would be needed. Areas need to be protected from development so that we do not lose the reason that tourists come here from an economic perspective and so that we do not lose our quality of place and quality of life. Wise, carefully planned and sited development can co-exist with preservation. Concentrate development to areas with an existing footprint to eliminate sprawl. Minimize rezoning – if the land was historically used to grow trees and a landowner bought it for that reason, rezoning should not be an option. The Plan should emphasize conserving vast tracts of open space with conservation easements. LURC must begin to identify areas of the North Woods where development should not happen and zone them off limits to developers. Prohibit development in the wild areas of the north woods.
Language aimed at finding strategies for guiding the location of development should remain in the Plan.	<ul style="list-style-type: none"> The future use of prospective zoning in the jurisdiction will be a valuable tool for the Commission as it guides development. The creation of zones where more intensive development can occur, coupled with pre-permitted or expedited permitted sites would provide landowners and developers with a better sense of where development is better able to receive a favorable site review and could eliminate some of the concern and unpredictability currently present in the process. Prospective zoning around service center areas would be a good idea. Specific standards to protect hillsides and ridgelines are necessary. Expand LURC's ability to guide appropriately the development of the North Maine Woods. The Commission's wish to explore ways to address the effects of exemptions to the Commission's process for directing development is strongly supported. LURC must identify areas of the North Woods where development should not happen and zone them off limits to developers. The language regarding strategies for guiding development should remain in the Plan: "Explore ways to address the effects of exemptions to the Commission's process for directing development; apply prospective zoning both in high-growth, high-value regions and in areas that are currently under less development pressure than high growth areas, but where existing or future development could undermine the principal values of the jurisdiction." The strategies in the Plan for guiding development to most appropriate places, especially areas where the unique principal values are particularly vulnerable to erosion as a result of development are strongly supported. Continue to refine and strengthen standards governing the location, siting, scale, intensity, nature and timing of development. The Plan must include a comprehensive assessment of the entire Moosehead Lake area, indentifying unique and visible areas which must be protected from development.

CHAPTER 4 – DEVELOPMENT: GUIDING DEVELOPMENT, <i>continued</i>	
Theme	Comment
The Plan should continue to address “Areas with Special Planning Needs”	<ul style="list-style-type: none"> • A substantial portion of the text from the 1997 Plan on ‘Areas with Special Planning Needs’ has been deleted. Some of this language provides detailed information on specific areas of the jurisdiction and some of this language has been used to support, in particular, prospective zoning efforts. The Plan should continue to address such areas.
Concentrating development around the old view of infrastructure as outlined in the Plan is a mistake.	<ul style="list-style-type: none"> • Concentration of development around the old view of infrastructure is a mistake. The Plan is not taking into account the changes in the technology that will have a profound effect on land uses. It is likely that we will find in 20 years that concentrating humans in villages and towns is in fact worse for the biosphere than spreading us out.
A TDR program as discussed in the Plan is not feasible.	<ul style="list-style-type: none"> • LURC’s present administrative machinery is already over-burdened; it does not seem capable of taking on a TDR program or programs encompassing all or even significant parts of the unorganized territory. The demand level in potential build areas within the unorganized territory does not seem sufficient to justify or sustain a TDR program. LURC may find it useful to study TDR; it may be possible to fashion a small pilot program in a discreetly sized area within LURC’s jurisdiction, but wider application of TDR as a regulatory tool capable of steering development away from the vast areas that LURC classifies as ‘high value natural resource areas’ does not seem either economically or legally feasible at this point in time.
The M-GN subdistrict in prospectively zoned areas should remain unchanged.	<ul style="list-style-type: none"> • LURC should make no changes, including in its rules and regulations, affecting M-GN zoning in those areas which have already been prospectively zoned.
Present adjacency rules as outlined in the Plan are unwise and stifle development.	<ul style="list-style-type: none"> • The present adjacency rules are unwise; they stifle development; they are unfair to the largest majority of property owners; and they are on a questionable legal footing. At the very least LURC would be well-advised to get on with the task of refining its adjacency rule. One would hope these refinements would significantly expand the number and size of land areas that would permit a wide array of new and changing uses – uses other than traditional subdivisions and woods related developments.
The Plan should focus on the conservation easement mechanism rather than on more regulation.	<ul style="list-style-type: none"> • The Plan should be promoting the protection of public interests through the conservation easement mechanism rather than through more regulation.
Additional regulation on development will negatively impact land value and economic opportunity.	<ul style="list-style-type: none"> • The draft CLUP appears to place restrictions which will limit the economic growth in locations such as the fringe and rural areas of the UTs. While the interior of the jurisdiction needs to be protected for traditional values, the fringe areas should be treated differently. • The CLUP suggests limiting the scale or application of new or emerging technologies to allow time for the Commission to evaluate the technology and its impacts. Delaying or limiting the size of proposed projects would mean the loss of jobs or opportunities. • The site review policies suggested in the Plan are a concern. Extreme site standards would discourage most commercial ventures from planning to build in the UT. • The Plan should not propose, or suggest taking away existing property rights • The Plan contains a decided pattern towards increased regulatory control, particularly over the location and type of residential dwellings allowed, leading landowners to be concerned over losing existing property rights. For example, wording on ability to place camps in the P-GP and MGN, addition of new building standards, and new road standards. • Chapter 4 states that development in some areas should be limited to low impact structures (i.e., relatively small structures with no public utilities, no pressurized water and no permanent foundation). There should be no broad brush method to squelch high value housing in the UT. • The right for landowners to periodically sell lots of the purpose of constructing residential dwellings should be preserved without undue restrictions such as the size restrictions of ‘remote camps,’ use restrictions of ‘low impact structures,’ or additional restrictions on location. Zones like the P-GP and M-GN should remain open for residential dwellings as now allowed by permit. • Regarding LURC’s rules for non-conforming shoreland development, as voluntary approaches transition to mandates and penalties, any attempt at reasonableness is going to be lost, due to the Commission’s relentless and blinding focus on protecting and promoting primitive pursuits. • The Plan’s vision, goals, and chapter 4 lay the foundation for rulemaking that would allow virtually no development in the interior of the UT. This section does not serve the public interest or the residents and landowners of the UT.

CHAPTER 4 – DEVELOPMENT: GUIDING DEVELOPMENT, <i>continued</i>	
Theme	Comment
The Plan could become an obstacle to new green technology and 'in woods' processing.	<ul style="list-style-type: none"> The wording in the Plan could become an obstacle to implementation of new green technology (which will require sustainable and carbon- neutral resources for fuels, chemicals and new materials) and therefore potentially limit Maine's green economic development. Emerging technology being developed by Forest Bioproducts Research Institute (FBRI) will soon be available to convert forest biomass into biofuels and industrial chemicals for the production of plastics and other valuable materials. A major limitation to implementing this technology in the remote geographic locations of Northern Maine is and will continue to be the high cost of handling and transporting woody biomass with low energy density and high water content over long haul distances to central processing facilities. An emerging solution to this transportation problem is new technology that can convert low value woody material into a slurry of char and oil called SynCrude. It can be economically transported long distances through the forest to centralized processing facilities. The development of this technology and the associated remote production/transportation system will likely be a prerequisite for forest biomass in Maine's unorganized towns to play a role in the emerging green economy. Statements in the vision such as the general lack of development in the interior is conducive to the protection of natural resources and associated values. The absence of development combined with pristine natural resources in interior areas provides unparalleled opportunities for various forms of primitive recreation..' as well as the Plan's development goals and policies are of concern in that they may limit future opportunities to locate appropriate in-the-woods bioprocessing facilities that may be essential to the development and implementation of a bioenergy future in the unorganized towns. Leave room in the Plan for 'in-woods' industrial processing facilities. With the evolution of forest based, in particular wood-based, energy, the Plan should be clear that reasonable industries and technologies will be accommodated in appropriate areas of the jurisdiction.

CHAPTER 4 – DEVELOPMENT: UNREGULATED DEVELOPMENT AND THE 2-IN-5 SUBDIVISION EXEMPTION	
Theme	Comment
The Plan overstates the issue of unregulated development.	<ul style="list-style-type: none"> Representing the 2-in-5 subdivision exemption as a loophole for uncontrolled development is an exaggeration of what has taken place and what could take place over the 10 year cycle of the CLUP. Lot creation and development are not the same issue. Stating that 66% of development is not subject to LURC review without saying that the magnitude is something on the order of one lot per township per decade in the jurisdiction overstates the concern. The subdivision process is available to a select few that have the resources to endure it, and is a disaster for landowners. Fix it and people would use it.
The Plan should explicitly state that LURC has no intention of supporting elimination or modification of 2-in-5.	<ul style="list-style-type: none"> The Plan should explicitly recognize that the Commission has no intent to support the elimination or modification of 2-in-5. 2-in-5 is an important value to landowners, especially rural landowners and should not be tampered with. Remove the language surrounding 2-in-5 that is unclear or questionably accurate. It is appropriate to continue to revisit the analysis of permits granted and monitor use of 2-in-5 in the future. It is not appropriate to include statements that conflict with the Commission's intent not to modify or eliminate 2-in-5. The Plan should empower staff to work with landowners to refine data and should specify that LURC shall take no action that modifies or eliminates use of the 2-in-5.
Unregulated development is an issue and the Plan should do more to address it.	<ul style="list-style-type: none"> The Commission's recent finding that 2/3 of residential development is happening on lots that are not reviewed for their location is of most concern, and demands not only close examination, but thoughtful action by LURC. Despite going to great lengths in the background of the document to describe the adverse effects of the statutory subdivision exemption, the implementation section doesn't list as an option that the legislature consider modifying that exemption. The Commission shouldn't shy away from what is so obviously a possible solution just because it is a lightning rod. The Plan should go further in pushing LURC or the legislature to come up with concrete solutions to unregulated development. The Plan is currently too vague.
The Commission's priority should be to eliminate unregulated development.	<ul style="list-style-type: none"> The Commission's priority must be to eliminate unregulated development and preserve the remote character of the region. All foreseeable loopholes that allow for inappropriate development should be identified and closed.

CHAPTER 4 – DEVELOPMENT: ROADS AND INFRASTRUCTURE	
Theme	Comment
The Plan should do more to acknowledge the important role of roads for forest management, recreation, etc.	<ul style="list-style-type: none"> The private road system and the use of motorized transportation and recreational vehicles in the jurisdiction is what gives folks the ability to enjoy the recreational opportunities that abound there. Roads are a critical component of forest management and they also influence recreational and other use. The Plan states that LURC ‘recognizes the importance of roads to forest management – a use which is generally compatible with habitat,’ but it does not explain why roads are important. In contrast, there are several instances where potential negative impacts of roads are noted, from impacts on wildlife to conversion to development. Without information on the evolution, necessity and characteristics of the forest transportation system, the Plan leads readers to believe that roads are bad and unnecessary. LURC has gone to great lengths in other chapters to document existing conditions, including historic context. It should do the same for roads. The Plan is missing a clear acknowledgement that roads are a vital asset to landowners and by their permission a vital asset to recreational users. Roads can enhance recreational values by making it possible to enjoy the scenic, wildlife and recreational opportunities by many persons who could not otherwise participate due to age, physical limitations or limitations on time and equipment.
LURC should establish a comprehensive roads policy.	<ul style="list-style-type: none"> Establish a comprehensive roads policy to decrease the impact of roads on wildlife and recreational resources, minimize erosion, habitat fragmentation and road mortality and to limit conversion of woods roads to more permanent roads. LURC should have guidelines and a plan for the location and appropriateness of roads and road construction.
The Plan should not modify landowners’ ability to build or manage roads.	<ul style="list-style-type: none"> Any statements that are directed at modifying or eliminating a landowner’s ability to build or manage forest management roads should be seriously weighed against the benefit that much of the public receives by having private roads on the ground and at the goodwill of mostly private landowners.
The Plan should support maintenance of roadless areas.	<ul style="list-style-type: none"> The plan should clearly address the need for the remaining roadless areas to remain roadless.
Logging roads should not be converted to subdivision roads.	<ul style="list-style-type: none"> Logging roads in remote areas should not be converted to roads for subdivisions, but instead have plans for decommissioning them when the logging is scheduled to be over.
The Plan should respect the need for an east-west highway.	<ul style="list-style-type: none"> Balanced development includes respecting the need for an east-west highway, transmission systems, and all types of recreation.

CHAPTER 5.1 – AGRICULTURAL RESOURCES	
Theme	Comment
There should be one set of standards for water withdrawals.	<ul style="list-style-type: none"> Since most agricultural fields in the state are under the DEP jurisdiction, LURC should accept its standards for water withdrawal. Farmers need only have one set of standards.

CHAPTER 5.2 – AIR RESOURCES	
Theme	Comment
The Plan fails to fully recognize the issue of climate change.	<ul style="list-style-type: none"> The Plan still fails to fully recognize climate change. The jurisdiction should be viewed as forestlands capable of reducing carbon emissions and sequestering carbon. LURC should address land use policies as they relate to climate change in the Plan. A whole chapter should be dedicated to climate change, which recognizes that: sound and sustainable land use practices is an effective policy tool to mitigate climate change; an effective and efficient method of mitigating climate change is to preserve and restore mixed age growth intact forest ecosystems to serve as carbon sinks; and habitat fragmentation and loss of biodiversity within the jurisdiction contributes to climate change. LURC should require a carbon footprint analysis for all development and rezonings.
The Plan accurately describes the issues, including climate change.	<ul style="list-style-type: none"> The Plan appears well researched, and clearly and accurately describes the issues. Air and climate change discussion and provisions are a needed and invaluable introduction. The addition of the discussion around climate change and its potential effects on the jurisdiction especially in relation to carbon storage and adaptation in the Plan is strongly supported. The policies could be reinforced to give LURC a more progressive role in dealing with this issue.
The Plan's language on climate change raises concerns about possible new restrictions.	<ul style="list-style-type: none"> The discussion on climate and references to carbon sequestration in the Plan will result in newly imposed restrictions and ultimately impact landowner value. These issues need to be acted on with great care. Advocating for standards that are tougher than state or federal standards is not fair or balanced.

CHAPTER 5.5 – ENERGY RESOURCES	
Theme	Comment
The Plan should not create barriers for the potential for energy and utility corridors.	<ul style="list-style-type: none"> The potential for energy, utility and transportation corridors will be adversely impacted without additional stakeholder involvement and attention in the Plan. One area of concern is the apparent decision to strip the section on future development of hydropower in LURC territory. It seems short-sighted to assume there will be no additional hydropower development in Maine. The Plan contains a reference to the Black Nubble proposal denial. It is unclear why the reason for denial must be included in the CLUP. Policy #12 should be rewritten to make the intent clear.
The Plan should state the need to balance energy production with natural resource protection.	<ul style="list-style-type: none"> Balance energy production with natural resource protection.
The Plan's discussion of and support for renewable energy is positive.	<ul style="list-style-type: none"> The Commission's recognition of the future development of renewable energy resources as an integral part of the state's energy policies is supported. The Plan appropriately acknowledges the need for development of wind power in Maine. The Plan's discussion of the Commission's flexibility to explore whether other areas in the jurisdiction merit inclusion in the expedited areas is supported, as is the Plan's proposal to update administrative and technical requirements which are included in regulatory review requirements for projects in the expedited area, for proposals outside of the expedited area.
The Plan should be consistent with other State energy strategies and plans.	<ul style="list-style-type: none"> The energy section should be consistent with other State strategies and plans. This is particularly true about wind energy.

CHAPTER 5.6 – FOREST RESOURCES	
Theme	Comment
Sustainable forest management is not more difficult to manage profitably.	<ul style="list-style-type: none"> The Plan's the inference that sustainable forest management is much more difficult to manage profitably than lands that are not sustainably managed for timber is not supported by the fact that there has been a huge increase in acres of third party certified land in the last ten years, and by the fact that forest management companies have been and are able to continually operate profitably from timber revenues.
The returns from sustainable harvests cannot pay for the purchase price of timberlands.	<ul style="list-style-type: none"> The Maine Forest Service has assembled information that could be used to determine what terms different categories of lenders could offer for forest land acquisition in Maine. The information assembled included not only the market value of the parcel as determined the appraiser, but also the level of harvest that could be sustained with active management on the property typical of current commercial forest management as practiced in Maine. MFS found that even with favorable terms, the returns from sustainable harvests could not begin to pay for the purchase price of these lands.
The concern about changes in ownership, forestland conversion, etc. is well-founded.	<ul style="list-style-type: none"> Rapid changes in the ownership of Maine's forest land, forest land conversion and forest land development proposals of an unprecedented scale have raised public concern about the future of Maine's forestland, its management, public access to it, and timber supplies for Maine's forest products industry. Regarding forest land conversion, the best estimate of the amount of land converted each year is 5,000-10,000 acres per year.
The Plan could place further restrictions on forest management.	<ul style="list-style-type: none"> Policy 3 creates the potential for dramatic restrictions of forestry activities on virtually unlimited acreage. Be clear and specific. Some of the language in the Plan could become the foundation for a move to zone the interior to a M-NC zone, which would severely limit other uses or development, and is a cause for extreme concern.
The Plan must acknowledge that preservation of land value is a critical ingredient to successful forest management.	<ul style="list-style-type: none"> Allow for a full range of forest management activities and acknowledge that preservation of land value is a critical ingredient to successful management. The Plan implicates that landowner change is negative. The landowner community disagrees with this characterization, and with statements about the discrepancy between timberland values and the value that can be generated through sustainable forest management. Maintaining landowner value is a critical component to keeping Maine's forests working.
Identified issues in Plan (development, fragmentation, ownership changes) are inaccurate and unfounded. The greatest risk to the forest is to make it unworthy of continued investment.	<ul style="list-style-type: none"> The main theme in this section does not speak to the forest resource. Instead, it dedicates considerable language to the perceived threat development, fragmentation, and change of ownership brings to the forest. Much of the fragmentation data were garnered from statewide databases and it is inappropriate to apply these data to the UT. And the data may misrepresent what is actually occurring in some land transfers. The Maine Forest Product Council's piece on fragmentation and changing patters of development was solicited by the Commission and should be included in the Plan. There are some serious misunderstandings about how private non industrial landowners think about their lands and how those misunderstandings may threaten the forest resource. Landowner concerns include: devalue the asset – loss of interest in the investment, public use of private land – costs, burdens and protection of resources both private and public, a stagnant forest – no innovation, no change, no viability, and health of the industry – without good markets it will not survive. There was testimony that there is a tendency for parcels of land 500 acres or smaller to come out of tree growth. However, LURC staff and forest landowners have concluded from the same data that even as parcelization is occurring in the jurisdiction, acres classified under tree growth have remained relatively constant. This indicates that smaller parcels continue to stay under the tree growth system. There may no greater risk to the forest than to make it unworthy of continued investment. Under changing patterns of ownership the misnomer that value is somehow only the purview of the new landowners is terribly misleading. The ability of their land base to provide a diversity of income and appreciation not only sustains investment in timberlands but also provides the ability to weather tough times such as those that we are now experiencing. There are some extremely misleading statements in the Plan made about why landowners have chosen not to develop. The private non-industrial owners who did not wish to develop did so under the premise that those opportunities and values would not be lost without just compensation.
The Plan should establish goals, policies, standards, etc., for better protecting natural resources in a managed forest setting.	<ul style="list-style-type: none"> Implement timber harvesting standards that better protect water quality and wildlife habitat and movement in riparian areas. Establish goals and policies that promote conservation of biological diversity within areas managed for timber production.

CHAPTER 5.8 – PLANT AND ANIMAL HABITAT RESOURCES	
Theme	Comment
The Plan should enhance protection of ecologically important areas.	<ul style="list-style-type: none"> Enhance protection of ecologically important areas. Certain areas should be considered for better protection such as unique natural areas, remote ponds and streams, native trout fisheries, winter deer yards, threatened wildlife species habitat, and traditional historic canoe carries.
The Plan does not sufficiently recognize the successes in protecting plant and animal resources.	<ul style="list-style-type: none"> There is still a bias towards the 'bad news' focusing on the number of 'species of greatest conservation need' occurring in the jurisdiction. Many of these species live in habitats that are already protected by DEP and LURC regulations. Shouldn't we celebrate the good news that we have not lost species but instead gained 25. Why is the good news relegated to a footnote at the bottom of the page? The Plan should recognize successful efforts to protect plant and animal habitat, including conservation easements, landowner initiatives and State programs. The tone of the Plan is still biased towards bad news, focusing on species of concern. The strength of arguments in the draft CLUP characterizing roads as fragmenting features is not appropriate.
The Plan should do more to recognize invasive fish species issues.	<ul style="list-style-type: none"> The Plan should do more to recognize the issue of invasive fish species.
The changes to this section of the Plan are generally positive.	<ul style="list-style-type: none"> Appreciate that the current draft acknowledges the voluntary and collaborative programs landowners have supported and actions they have taken to protect many of the ecological values important to the jurisdiction. Glad to see that the current draft of the CLUP has backed away from insisting that LURC should lead the charge on landscape scale habitat planning. Happy to see that vernal pool issue is being addressed.
The Plan language and policies will negatively impact forest management.	<ul style="list-style-type: none"> Policy #2 and #9 are so broad and all-inclusive that they could be used to 'regulate' just about any land use LURC wanted and for that reason they give very little direction to this as a planning document and even less comfort to landowners. It appears that wildlife habitat is pre-empting forest management. The wording of policy #9 opens the way for regulatory control over habitats not statutorily regulated and provided through normal forest management practices.
LURC should do more to protect unique natural areas, habitats, riparian areas, etc.	<ul style="list-style-type: none"> A major priority should be pursuing landscape scale habitat protection and wildlife corridors to preserve ecosystems. Habitats of unique or special status species should get strong protections. Unique natural areas such as remote ponds, streams, rivers, deer yards, canoe routes and carry trails, threatened wildlife species habitat and native trout fishers need to be clearly delineated and given a higher priority for protection. The importance of the riparian area in the P-SL2 zones to protect aquatic habitat cannot be overstated. Serious consideration should be made to expand the width of the P-SL2 zones so as to improve the quality of shade protecting the water temperature in these cold brooks. We would suggest that it is small brooks in the P-SL2 zone that should have the 250 foot protection zone and the 75 feet of protection should apply to the larger rivers in the P-SL1 zone.

CHAPTER 5.9 – RECREATIONAL RESOURCES: DATA	
Theme	Comment
The Plan should update certain numbers, data, and use trends.	<ul style="list-style-type: none"> Include 2009 numbers on recreation use levels. These numbers may show a slight upward shift in use numbers in the North Woods. The Plan misses the boat in predicting the demise of hunting and fishing in the UT. In the future, this area of the state will play an even bigger role in delivering the experiences that sportsmen in and outside of Maine seek and value. Several statements are made about recreation use trends that are not entirely correct or are not consistent with other sources. LURC should work more closely with the Office of Tourism and those working on the nature tourism initiatives in order to gain a better understanding of the market and trends. The snowmobile trail mileage on public lands is overstated by a factor of 10.

CHAPTER 5.9 – RECREATIONAL RESOURCES: RECREATION USE CONFLICTS	
Theme	Comment
Discussion of 'recreational use conflicts' should be eliminated from Plan.	<ul style="list-style-type: none"> • Discussion of 'recreational use conflicts' should be eliminated from the Plan. The idea that a regulatory body should insert themselves into a private landowner's decision-making process over who should be allowed to do what and where on their property is unacceptable. LURC should not involve itself in trail regulation other than addressing existing regulations regarding a trail's effect on environmental conditions.
The Plan does a good job of balancing recreation uses.	<ul style="list-style-type: none"> • Some language in the Plan does a good job of balancing competing recreation use, recognizes the sensitivities of some types of activities, and acknowledges the landowners as having the final say.

CHAPTER 5.9 – RECREATIONAL RESOURCES: MOTORIZED AND NON-MOTORIZED RECREATION USES	
Theme	Comment
The Plan has been responsive to concerns about motorized recreation and may have gone too far in this regard.	<ul style="list-style-type: none"> • The Plan has been responsive to the concerns about motorized recreation and the principal values are an example of that responsiveness. There is room for everyone and the plan adds significant language around motorized recreation. However, the Plan de-emphasizes primitive pursuits – a term which accurately describes the long-standing traditions of hunting, fishing, wildlife watching, trapping and camping. There is concern that LURC may be going too far in endorsing the notion that these activities can't be done without a motorized vehicle.
The Plan should protect remote, primitive recreation opportunities and resources.	<ul style="list-style-type: none"> • The Plan should better protect remote recreation opportunities by encouraging work with public and private landowners to create backcountry recreation areas for human-powered uses. The Plan should identify and apply P-RR zoning to areas that have high backcountry recreation potential. • LURC should move strongly in the direction of primitive recreational use. It is in these areas that the long term competitive advantage for Maine's tourism industry reside. • The balance between different forms of recreation is a concern. Glad to see that there are areas that will be limited to maintain the remote feel of that area and to protect areas where there are high value resources. • The Plan should strengthen policies to help protect traditional canoe routes from the impacts of development. • Motorized recreation should be concentrated and separated from areas where non-motorized recreation can be pursued. • Protect the remote recreation experience on appropriate lakes ponds, rivers and the Appalachian Trail. • LURC should give priority to primitive recreation in wilderness areas. Back-country hiking and skiing cannot coexist with motorized recreation. Keeping ATVs and snowmobiles out of remote, environmentally sensitive areas should be a primary goal. • Motorized and non-motorized recreation are incompatible. Quiet recreation brings revenue to Maine too but does not have a loud lobby voice. Motorized recreation groups are organized and vocal and consequently get their way. LURC should be cautious about the expansion of access by the trails it encourages. • Many non motorized recreationists feel that they have no voice in maintaining the traditionally quiet Maine Woods. Don't destroy the "Maine Brand".
The Plan has a continued bias towards non-intensive or primitive recreation.	<ul style="list-style-type: none"> • The Plan still has a bias towards non-intensive recreation except around fringe development areas. The expansion of more active mixed use recreation to more rural areas in the state is anticipated to be an important part of our eco-tourism plans. • The Plan ignores or diminishes the role that motorized recreation has had in Northern Maine and the inherent economic value it bring to this somewhat impoverished area. The Plan does not discuss allowing motorized recreation, but rather stresses the need to protect primitive areas, resolve conflicts that may arise near primitive areas and to the need to control road and trail development. • The tone of the Plan seems to be one of continually focusing on 'enhancing primitive recreational activities.' The Plan has too much focus on rule making to encourage more preservation type activity.

CHAPTER 5.9 – RECREATIONAL RESOURCES: RECREATION MANAGEMENT	
Theme	Comment
The Plan puts the Commission in an inappropriate role of managing recreation.	<ul style="list-style-type: none"> • The Plan attempts to take the control of recreational access away from landowners. • It is not appropriate for LURC to apply regulations that push landowners to provide certain types of recreational activity when that landowner might prefer another. It is not for LURC to designate land use zones that prevent certain recreational activities in favor of others, except for those having adverse environmental and resources impacts. Broad based zoning for recreational uses is unnecessary. It is not feasible for LURC to accommodate major recreational activities by designating land use zones for that purpose. • The Plan includes the concept of temporal shifting. Examples of temporal shifting in Maine have not involved governmental land use zoning restrictions. They involve cooperative efforts between resource managers, landowners and recreational users. Lets keep it that way. • The Plan should explicitly state that the management of recreational access ultimately will be the responsibility of the landowner. • The Plan should recognize that planning for recreation is primarily the responsibility of the private landowners on whose land it occurs. The Plan places a new emphasis on providing for and protecting primitive experiences as well as identifying what uses are compatible. LURC should not be deciding what recreational activities can take place on private land. LURC should be encouraging multiple-use recreational opportunities at the discretion of the landowner. • It is not LURC's place to decide which recreational uses are compatible with other recreational uses. • The Plan should explicitly state that the management of recreational access ultimately will be the responsibility of the landowner. There is a real concern among the public that LURC is considering managing recreational activities on private land, and an explicit statement informing readers that this is not LURC's intent may mitigate much of the concern. • The Plan places new emphasis on providing for and protecting so called primitive pursuits as well as identifying and managing uses deemed compatible. Landowners should be able to determine the activities and levels of use that are compatible on their land. LURC should encourage multiple-use recreational opportunities at the discretion of the landowner.

CHAPTER 5.9 – RECREATIONAL RESOURCES: PUBLIC ACCESS	
Theme	Comment
The Plan's concern about fragmentation of ownership and loss of access is unfounded.	<ul style="list-style-type: none"> • While the Plan rightly acknowledges that the overwhelming majority of recreation takes place on private ownership due to the long established policies of public access, it inaccurately speaks to the popular mantra of changes in ownership resulting in a fragmented landscape and a loss of access. This is simply not the case in regards to recreational access.
The Plan should acknowledge expense incurred by private landowners in providing recreational access.	<ul style="list-style-type: none"> • This section should strongly acknowledge the considerable expense that is incurred by private landowners by providing recreational access to the public.
Changes in the Plan could result in loss of public access.	<ul style="list-style-type: none"> • If regulatory restrictions reduce potential income from sources such as limited development, or harvesting within scenic viewshed areas, then financial pressure on recreational access will increase. The public benefit of historical access granted by landowners must not be tossed aside in favor of some new public value like viewsheds or climate controlling carbon storage. • We have grave concerns that some of the changes being proposed for the CLUP will result in major loss of our traditional open land access privilege.

CHAPTER 5.9 – RECREATIONAL RESOURCES: COMMERCIAL SPORTING CAMPS	
Theme	Comment
The Plan should consider ways to be supportive of the continued viability of sporting camps.	<ul style="list-style-type: none"> Find additional ways in which traditional sporting camps can be better invested in to bring them up to modern standards while keeping their traditional architecture, look and feel. For sporting camps to be able to continue operation in a profitable manner, outpost camps should not be included in the total square footage of the main operation, and the total square footage allowed be increased from 10,000 square feet to a figure between 12,000 and 14,000 square feet. The issues of using the adjacency principle as a node for development and other inappropriate activities in the immediate vicinity of a sporting camp have been favorably addressed in the Plan. There are numerous places in the Plan which are supportive and protective of sporting camps. However, the maximum square footage for a sporting camp should be increased from the 10,000 in the current definition to somewhere between 12,000 and 14,000 square feet.
The Plan should not contemplate rezoning of pre-1971 D-GN sporting camps.	<ul style="list-style-type: none"> Zoning of all pre-1971 D-GN sporting camps should remain. A blanket rezoning may cause camps undue difficulty if the rezonings do not allow camps to change to meet the times. Any camp that is sold as a sporting camp, however, should be required to continue to operate as a sporting camp, consistent with current rules and regulations. More restrictive zoning requirements that would lead to the inability of sporting camps to re-develop their facilities in order to survive should not be considered in the Plan.
The Plan should address the construction of huts and trails.	<ul style="list-style-type: none"> The Plan should address the building of huts and trails.

CHAPTER 5.9 – RECREATIONAL RESOURCES: OTHER	
Theme	Comment
The Plan should not compromise the improvement of public boat ramps in relatively remote settings.	<ul style="list-style-type: none"> In addition to existing boat launches, IF&W recognizes that there are many waters in the jurisdiction that do not have developed or improved boat launches but have been used historically by anglers and boaters who use motors. We support maintaining the traditional and historical angling opportunities on these waters as well. We have concerns that development of improved public boat ramps may be compromised under the perception of protecting the relatively remote setting on large lakes with very little shoreline development. IF&W seeks to afford relatively equal access conditions for the public.
The Plan should reinstate the 1997 recreation goal.	<ul style="list-style-type: none"> The goal as stated in the 1997 CLUP was much more comprehensive and detailed. The Plan falls short. The language from the 1997 Plan should be retained. The reference to protection of recreational resources associated with geographic/geologic features is not in the Plan. This is an important concept – riverways, mountains, river, ponds, and traditional canoe portage routes – these cannot be re-located and deserve particular mention in the CLUP's policies.
The Plan should clarify certain definitions.	<ul style="list-style-type: none"> The Plan adds definitions for terms like primitive, but there needs to be more clarity. For instance, hunting is often noted as a primitive activity but not in the special definition box for primitive.
The Plan does a good job discussing the impact of development on recreation.	<ul style="list-style-type: none"> The language that discusses development impact on recreation is strongly supported. This discussion should be reflected in the goals and policies section as well.
The Plan is overly restrictive of future tourism development.	<ul style="list-style-type: none"> References to remoteness and focus on primitive pursuits could inhibit future recreation and tourism activities. Industry trends show that primitive pursuits have a very limited interest from today's travelers. However, upscale facilities with amenities that are designed to be compatible with their surroundings are in greatest demand. We are concerned that the Plan will result in a loss of access for tourism and recreation uses and be overly restrictive regarding future tourism development within the jurisdiction.

CHAPTER 5.10 – SCENIC RESOURCES	
Theme	Comment
The Plan discussion of scenic resources goes beyond LURC's mandate and will adversely impact forest management.	<ul style="list-style-type: none"> • The policy to "continue to regulate timber harvesting activities in important recreational and scenic areas to protect aesthetic qualities" should be clear and specific. • The Commission should draw reasonable limits around the protection of the 'scenic' character of the jurisdiction. The Statute limits the Commission's authority to regulate the 'significant' scenic feature of the jurisdiction. The Plan goes beyond this legislative intent. • The discussion on viewsheds could spell disaster for woods operations and development since it seems to imply that everything in the jurisdiction is scenic. The emphasis should be on preventing unreasonable adverse impacts to identified, high-value scenic resources.
It is important to regulate and protect the scenic resources of the jurisdiction.	<ul style="list-style-type: none"> • Because the scenic resources of the jurisdiction are so intricately tied to the Commission's principal values, it is critical that they are well regulated. This is especially true when considering the impact of development on scenic resources. It is extremely important that the Commission draft rules and policies to protect the scenic character of ridgelines and hillsides.

CHAPTER 5.11 – WATER RESOURCES	
Theme	Comment
The Plan sufficiently addresses water quality and extraction issues.	<ul style="list-style-type: none"> • Glad to see that water quality degradation and water extraction are being addressed.
Water resources protections should be strengthened.	<ul style="list-style-type: none"> • It is increasingly important to protect Maine's water resources and ecosystems, especially when considering climate change. • The Plan should support strengthening protections for high value lakes and ponds, notably back-country remote ponds.
The Plan may compromise the development of public boat ramps.	<ul style="list-style-type: none"> • Development of improved, public boat ramps may be compromised under the perception of protecting the relatively remote setting on large lakes with very little shoreline development other than few private camps. IF&W seeks to afford relatively equal access conditions.

CHAPTER 7 – IMPLEMENTATION	
Theme	Comment
The Plan should continue in its efforts to identify areas least appropriate for development.	<ul style="list-style-type: none"> • The Plan's direction to the Commission to identify areas of our unique ecology which would be threatened by development and need to be protected is supported.
The Plan should elaborate on a public participation process.	<ul style="list-style-type: none"> • A public participation process should be better described in the implementation section. There is a need for a process that uses the input, creativity, and expertise of the local residents, workers and companies in developing guidelines for the location of land uses. Consider identifying forms of funding for this(e.g., TIF funds, grant support, private funding, and legislative support).
The Plan should include an implementation schedule with clear prioritization. Addressing unplanned development should be the top priority.	<ul style="list-style-type: none"> • The Plan is not clear on how the Commission will prioritize proposed policy changes. The Plan outlines a host of goals and policies that are necessary to insure the future of the jurisdiction. However it remains unclear how the Commission will move forward to address these issues. The revised Plan should include an implementation schedule with a clear prioritization of policy initiatives, and a specific schedule indicating the order and approximate time frame in which the initiatives will be undertaken. It is important that the Plan clearly lay out how the Commission plans to proceed with addressing the important issues outlined in the Plan. • Addressing the problem of unplanned development should be the Commission's most immediate and top policy priority. As part of that effort, addressing the effects of exemptions to the Commission's process for directing development and identifying areas least appropriate for development should be the first steps. There is concern that competing priorities will drain away the Commission's ability to deal with the complex, but most important problem of unplanned development unless a clear commitment is made in the CLUP to prioritize find a solution.

APPENDIX C	
Theme	Comment
The Plan should not include contemplation of periodic review of the Wildlands Lake Assessment.	<ul style="list-style-type: none"> With regard to the Maine Wildlands Lake Assessment, there was no contemplation for a periodic review and update of the program. These issues which were hotly contested at the time and about which there are still many hard feelings should not be reopened. It reflects thorough public input and a balancing of interests that would be very difficult to replicate.
The Plan should include the directive to review and update the Wildlands Lake Assessment.	<ul style="list-style-type: none"> The Lakes Assessment needs to be reviewed and updated. IF&W has collected data on many of the waters in the jurisdiction since the original assessment, including many waters that were not surveyed at the time. The review should be a high priority since the management classes, which establish development criteria, are based on this assessment. The evaluation criteria used in the 1986 evaluation should be reviewed. A revised lake assessment should also consider additional protection for native fish species, especially brook trout. The list of zoned remote ponds should also be reviewed.