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February 24, 2020

RE: DRAFT- NRPA permit, # L-28397-4E-A-N, located in Upper Sheepscot River Estuary, Town of Alna – Jeffrey Spinney

Dear Ms. McNeil,

I have deep concerns about this draft NRPA license. My concerns are based upon 65 or so years of historical knowledge of natural resources conservation and use in the Sheepscot River Watershed, including the Upper Sheepscot River Estuary where the proposed project is located. I also have an extensive and broad education (BA, conservation of renewable natural resources and MS, natural resources policy, planning and administration, University of Michigan) and professional working experience in the conservation of natural resources, including pioneering work in environmental impact analysis and integrated natural resources policy, planning, and administration. I developed initial guidelines for the New York State Wild, Scenic and Recreational Rivers program that included acceptable river and related shoreland uses for each of these three river classifications. This program was one of the early state programs following soon after a comparable federal program began.

I conceived the idea for the Sheepscot Valley Conservation Association (SVCA) and have been professionally involved with the SVCA (now incorporated into the Midcoast Conservancy) from its beginning. Many years ago the SVCA recognized the special significance of the Sheepscot River Upper Estuary. Subsequently, a permanent forever-wild corridor for the upper estuary was begun to protect and preserve this very rare and unique river and shoreland ecosystem. Financial contributions to protect this ecosystem have been received from many individuals and conservation organizations, including the Nature Conservancy. I have been honored to make a professional contribution to help begin this forever wild river corridor protection and preservation effort. The proposed project poses a significant threat to the wild, scenic, aesthetic, and quiet non-motorized historical recreation uses appropriate for this section of the Sheepscot River.

The project description is incomplete and inaccurate. It fails to recognize the real scope and scale of environmental impacts to be reasonably expected over time. It would lead one to believe this river section is developed with "structures, lawns and docks".

There is no ecological characterization of the Upper Sheepscot River Estuary ecosystem where the project is located. In the past this section of the Sheepscot has been recognized as internationally rare and unique (marine scientist, Dr. Peter Larsen, retired, Bigelow Laboratory for Ocean Sciences).

The full intent of recreational uses and the likely environmental consequences on the Sheepscot River and related land resources from the operation of the Golden Ridge Sportsman's Club has not been fully described or considered. The applicant/ Sportsman's Club also have not shown the financial capacity to meet license conditions.

The Golden Ridge Sportsman's Club would be the first significant recreational development in the Upper Sheepscot River Estuary ecosystem. There has been no consideration of the precedent this would set or the likely cumulative impacts from other similar development here.

I have an experimental/demonstration woodlot with some river frontage within the Sheepscot River Upper Estuary, a relatively short distance upstream from the project location.

Based upon the existing and special natural environmental character of the Sheepscot River Upper Estuary ecosystem, which includes the project area, I am convinced this project would not survive full legal discovery and a thoughtful legal presentation.

I appreciate the opportunity to comment on this NRPA draft license and strongly urge it be rejected by the DEP Bureau of Land Resources.

Most sincerely,

Nicholas Barth

Cc: Commissioner Gerald D. Reid