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February 26, 2020

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

Dear Ms. MacNeil and Mr. Clement,

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

A River worth Protecting

The Sheepscot is not just another river. It is internationally significant as one of the southernmost rivers with endangered wild Atlantic salmon, and a river with focused restoration efforts that will soon result in the removal, or partial removal, of all barriers to migratory fish. The draft decision has not adequately taken into account what the river means to the State of Maine and how the proposed project would adversely impact these values by forever changing the type of use and degrading the quality of the experience for current users.

Midcoast Conservancy has worked with multiple Federal, State, local and private partners to reconnect the river from its source in Liberty to the sea. To date, an estimated \$2,000,000 + has been spent to ensure fish passage through the Head Tide dam in Alna and Coopers Mills in Whitefield alone. More projects to ensure fish passage are in the works including providing passage to Branch Pond on the West Branch of the Sheepscot. Hundreds of thousands have been spent on water quality monitoring, identifying salmon spawning habitat, planting salmon embryos at spawning sites, as well as other projects. The beneficiaries of this work include all 12

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of Maine's wild migratory fish who inhabit the river, future anglers, and residents with hand-carry boats, local fire departments who have reliable sources of water for their suppression efforts (included as part of the dam removal) and all the towns and residents that benefit from the river.

For Midcoast Conservancy, ensuring the Sheepscot River continues to run clear and cold has meant investing heavily in land protection in the headwaters and in other areas along the river. We have protected over 7,300 acres of land within the Sheepscot watershed alone.

A River-section Worth Protecting

The area between Sheepscot Village and Head Tide retains a rare sense of wilderness and has been misrepresented by the applicant as an area filled with lawns, structures and docks. None of the current docks approach the dock size proposed in the application. Part of why this area feels so remote and untouched is because Midcoast Conservancy has protected over 700 acres there, all of which has access to the Sheepscot River. These acres include 4.3 linear miles of undeveloped shoreline. The Dyer River tributary which is in close proximity to the project would also be impacted by the project has 9.3 acres of protected land and 0.7 miles of protected shoreline. These lands are open to hunting and fishing to all, including the members of the Golden Ridge Sportsman's Club.

This area is a Maine, Beginning with Habitat, Area of Statewide Ecological Significance. Among the rare species known to occur here are the Salt Marsh and Nelson's sharp-tailed sparrows, the brook floater mussel, and a half dozen rare species of plant. Additional detail about this outstanding section of river including the lower Dyer River is provided in the attached 'Beginning with Habitat' document devoted to this focus area.

Precedent-setting decision

There has been no independent assessment of current recreational uses within this section of the river. The record shows significant disagreement between the applicant and the opponents. Our opinion that the river's current use would be degraded by the proposal is based on our extensive conservation work along this section of the river. However, the discrepancy should be remedied by an unbiased assessment prior to the Maine Department of Environmental Protection issuing a final decision. The applicant submitting one image showing "*at least one motorized boat docked on this section of river*" is an inadequate basis for determining that the project will not have an impact on existing recreational values.

The proposed private club and its expanded motorized use is not for the general public and should not be weighed as offering a "public value." The fact that there is no "practicable alternative" to the applicant's proposal is the very reason this section of river retains its remote character. Such flawed reasoning should not be used to forever change the experience for Maine residents on this unique section of the Sheepscot River. Motorized boats are generally



inappropriate for this section of river and infrastructure should not be permitted to allow this change in use when there are alternative waterbodies that are more appropriate.

Again, we urge the Maine Dept. of Environmental Protection to be part of protecting the tremendous investment made on the Sheepscot River by Federal, State and municipal authorities along with many others including The Nature Conservancy, Atlantic Salmon Federation and of course Midcoast Conservancy, and the thousands of individual volunteers and donors who have given their valuable time and money to support the work of these organizations here. Collectively, these agencies, organizations and members have invested millions of dollars and countless volunteer hours towards restoring and protecting this incredible river and as such the current application should be denied as currently proposed. A boat ramp for personal use only with a smaller, more appropriately sized float system is better suited for this location.

Sincerely,



Jody Jones
Executive Director

Cc: Commissioner Gerald D. Reid
Alna Planning Board

Attached: Beginning with Habitat, Lower Sheepscot River Focus Area

