

## Interested Party Issues List

Carol Pierson

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The following is the list of issues of concern of the duly designated interested party. It will include support for many issues already identified by the intervenors and agencies, but will emphasize issues particular to the proposed Cross Lake D and E residential zones, the areas with which we are most familiar.

1. Water Quality. In a plan such as this, based around a chain of lakes, water quality is an overarching issue. The Technical Review Memorandum from the Maine DEP is the most important document for assessing water quality issues. That document notes that Cross Lake currently **fails** to meet water quality standards [page 1.] While the report states that phosphorous levels are elevated due primarily to agricultural runoff, it also cautions about the risks from road building, construction and wood harvesting operations. We are concerned about the necessity to build a road of over 4000 feet to access proposed Cross Lake E. Combined with the steep slopes in that zone, the DEP recommended a cap of 10 units without best practices, as opposed to the cap of 60 units the plan lists [DEP submission page 10.] We believe the risks to water quality involved in constructing such a road and then in lot development are not justified for such a small number [or any number] of units. Cross Lake E also shares a border with the conservation easement area, and puts that wetland at risk as well. We agree with the Intervenor NRCM [see page 1, number 5 of their submission] who proposes that Cross Lake E residential development zone be **removed** from the concept plan. The risk to water quality is too great. [There is also a scenic objection to Cross Lake E...see below.]

In conclusion, the DEP submission states: "Fitting the level of development that is proposed into the Cross Lake watershed will present very significant challenges." We agree, and suggest that the elimination of Cross Lake E will reduce the challenges.

A closely related issue, also bearing on water quality is:

- 2, Boundary of Cross Lake D. Currently the Pierson Camp is the only structure on Cross Lake that lies south of the Landing Road. We believe that should remain so. The camp is an old log cabin, set back and well obscured by trees. Inconspicuous. Not an assault on the landscape. As proposed, Cross Lake D would engulf the camp. We believe that the Landing road itself is the logical southern boundary for Cross Lake D.

The DEP document notes that in calculating the lots for Cross Lake D there is a 16% deduction for “steep slopes that are considered non-buildable....” What they do not note, but any cursory observation will reveal, is that the area south of the landing road has very steep slopes, from the Landing Road until the southern boundary of zone D. We are intimately familiar with this area and in addition to the steep slopes the soils are shallow and often poorly drained. Water quality will be at greater risk if this area south of the Landing Road is included in Cross Lake D. We believe, based on experience, that the digging of wells and conforming septic systems would be problematic. In addition the DEP document states that their calculations assume “access off the existing road.” [see page 10.] There is no existing road south of Landing Road in Cross Lake D, which would therefore require a new road to be constructed with all the inherent water quality risks. For all these reasons we suggest that Landing road serve as the southern border of Cross Lake D.

3. Roads. We support FRLAs issue regarding clarification of road ownership.
4. Natural and Wildlife resources. We support the recommendations for study by the Maine Dept. of IF and W as specified on pages 14-18 of their submission. We note here that, in proposed Cross Lake D, the unbroken area south of the Landing Road, reaching to the southern end of the lake, is much frequented by eagles and osprey, and rich in other wildlife, from amphibians to otters. It has plentiful songbirds with rarely heard songs. That entire area should remain undeveloped. We also support a thorough archaeological evaluation of the proposed development zones, so that no historically significant settings or artifacts are destroyed by development.
5. Scenic values. Cross Lake E is noted for its scenic value as an undeveloped area by both FRLA [#5 page 8] and NRCM [#13.] We concur. It should be free from development, for this and the reasons stated in #1 above.
6. NRCM opposes remote cabins [#10.] We concur with their objections and reasoning, especially when it comes to Carry Pond [see also Maine IF and W submission on page 10.]
7. Conservation Easement and Forestry practices and standards. The Forest Society of Maine, the prospective holder of the conservation easement, goes into detail about its issues with the easement as currently proposed as well as the need for more specificity regarding forest management activities [#7.] The NRCM also has issues

with the easement [see NRCM submission at pg. 2, #8.] We are in strong agreement with the FSM and NRCM on these issues, After all, the petitioner is obviously looking for an additional benefit by including the easement in the plan. There should be an additional benefit for the public and the environment, an additional series of protections, supplemental to those that already exist under State law and rule.

This document was prepared by Steve DeMaio, the duly designated agent of interested person Carol Pierson. If necessary, we are both prepared to act as witnesses at public hearing.