

**STATE OF MAINE  
LAND USE PLANNING COMMISSION**

<b>Irving Woodlands LLC</b>	)	<b>FISH RIVER LAKES LEASEHOLDERS</b>
<b>Proposed Fish River Lakes Concept Plan</b>	)	<b>ASSOCIATION</b>
<b>Zoning Petition ZP 768</b>	)	<b>TOPIC THREE PRE-FILED TESTIMONY</b>
	)	<b><u>Anticipated Use of Lakes and Lake Character</u></b>

**Name of Witness:** Cheryl L. St. Peter  
**Physical Address:** 203 Cyr Road  
**& Mailing** Cross Lake, ME 04779

**Qualification of Witness:**

I have been the Secretary of the Fish River Lakes Leaseholders Association (FRLLA) for 13 years; the FRLLA has represented the approximately 360 Irving license holders on Long, Cross and Square Lakes for 25 years. I have lived on Cross Lake for 14 years, owned a camp on the lake for many years before that, and even before that visited my husband’s parents’ camp on the lake, built over 50 years ago. I am also the Secretary/Treasurer of the road association for the camp road we live on, Cyr Road. My husband and I have boated on all of the Fish River Lakes and thoroughfares in the Concept Plan area; in fact we motored our canoe from the north end of Long Lake all the way to the St. John River one day, something not a lot of people have probably done. We have three daughters who have grown up coming to the lake (one has also lived here) and six grandchildren who spend a great deal of time at the lake both summer and winter. They all ice fish with Grampy and are constantly swimming or begging to go tubing in the summer. We also greatly enjoy our quiet canoe or kayak paddling trips through the thoroughfares. I am a retired Professional Engineer and owned an environmental consulting company (County Environmental Engineering, Inc.) for over 20 years, and a drinking water testing laboratory (Northern Maine Water Testing) for nine years. I also taught high school science and math for several years when our girls were young.

**SUMMARY of TESTIMONY**

**1) Subtopic: Types and Location of Public Access to Lakes**

- a) **Only Allow Public Access at Locations Historically Used and/or Designed for Public Access:** Public access to the lakes in the plan area should only be permitted at locations historically used and/or specifically designed and designated for public access, such as Long Lake Beach and Cross Lake Boat Landing.
- b) **Public Access Roads Shared with Existing Camp Owners:** The Commission should consider requiring added provisions to the plan designating ownership and maintenance responsibilities and requirements of roads to public areas shared with existing camp owners when/if the existing camp lots or a parcel or parcels in a related development area are sold, while considering the potential impacts to existing camp owners of the Petitioner possibly closing those roads.

2) ***Subtopic: Anticipated Change in Intensity and Types of Use of Lakes***

- a) **Allow Only Private Water Access Sites in Residential Development Zones (D-FRL-RS)**: All public or commercial uses allowed in the residential development zones for water access sites should be removed from the plan and only private uses to serve the residential development zone where the water access site is located should be allowed.
- b) **Consultation with Governmental Review Agencies**: When a subdivision application is submitted that includes a proposed water access site, the Commission should consider requiring consultation with governmental review agencies, including but not limited to: Bureau of Parks and Lands (BPL), Department of Inland Fisheries and Wildlife (DIFW), Department of Environmental Protection (DEP), Maine Natural Areas Program (MNAP), and the State Soil Scientist regarding the locations of proposed water access sites and the types and numbers of proposed shoreland structures. A written statement should be submitted to the Commission summarizing the advice of these governmental review agencies and explaining how this advice was taken into consideration in development of the proposed water access site.
- c) **Document Boating Levels & Determine Carrying Capacity using WALROS System**: When a subdivision application is submitted that includes a proposed water access site, the Commission should consider requiring documentation of the existing boating levels in that section of the lake and, in consultation with the BPL and DIFW, ensure that the ‘carrying capacity’ will remain within the Commission’s agreed upon Water Recreation Opportunity Spectrum (WALROS) designation for each and all of the specific portions of the lake referenced in the Concept Plan.

3) ***Subtopic: Anticipated Effect on Recreation Uses and Experiences***

**Cross Lake E and Square Lake Development Areas**. As discussed under Topic Two regarding the relative *remoteness* of these two areas, the Commission should carefully consider the amount and location of the proposed development in these locations due to their effect on the *recreation uses* and *experiences* in these areas.

4) ***Subtopic: Effect on Character of Lakes (including Scenic Impacts of Hillside Development) and User Experience***

- a) **Scenic Impact of Hillside Development**: The Commission should consider not allowing development on slopes in excess of 20% to lessen the scenic impact and potential impacts to water quality due to erosion.
- b) **Hillside Development Education, Enforcement & Inspections**: The Commission should require inclusion of provisions regarding education and enforceability in the plan (as stated in the amendments) and annual inspections for compliance with the standards related to hillside development.
- c) **Cross Lake E and Square Lake Development Areas**. As discussed under Topic Two regarding the relative *remoteness* of these two areas, the Commission should carefully consider the amount and location of the proposed development in these locations due to their effect on the *natural character* of these areas.

## 1) *Subtopic: Types and Location of Public Access to Lakes*

### a) **Only Allow Public Access at Locations Historically Used and/or Designed for Public Access**

We ask the Commission to consider only allowing public access to the lakes in the Concept Plan area at locations historically used and/or specifically designed and designated for public access, such as Long Lake Beach or Cross Lake Boat Landing.

There is no compelling reason to open these residential water access sites to public use – the Concept Plan already allows a public access point on each of the lakes that also have proposed residential development areas, but either in an existing or more appropriate location. If opened to the public, there could be up to three additional public water access sites in Van Buren Cove besides Long Lake Beach, six on Cross Lake besides the Boat Landing, and four on Square Lake.

As we will present under Topic One: Access and Potential Impacts to Existing Camp Owners, *Subtopic: Impacts on Existing Camp Owners, Water Access for Subdivisions*, opening the residential development area water access sites to the public may cause significant problems for the existing camp owners, road owners and road associations, and the residential development that the water access site is intended to serve, including: excessive traffic, excessive parking on the road, noise, trash, parties with drinking and illegal substance use, safety issues with campfires, and a substantial increase in boats and people in the water (problems that have already occurred at existing public access points).

### b) **Public Access Roads Shared with Existing Camp Owners**

We also have concerns regarding the ownership and maintenance responsibilities and requirements of the private roads to these public access points. Again, as we will present under Topic One: Access and Potential Impacts to Existing Camp Owners, *Subtopic: Impacts on Existing Camp Owners, Road Ownership, Associations, and Maintenance*, we ask the Commission to consider requiring added provisions to the plan designating ownership and maintenance responsibilities and requirements of roads to public areas shared with existing camp owners when/if the existing camp lots or a parcel or parcels in a related development area are sold, as well as the potential impacts to existing camp owners of the Petitioner possibly closing those roads.

To be clear, we are not requesting that the plan dictate when/if the existing camp lots or a parcel or parcels in a related development area are sold, or that the Petitioner own and maintain (both summer and winter) Lake Road, which extends from the Van Buren town line to the public Long Lake Beach and the existing camp lots in Van Buren Cove, as well as the proposed residential development areas of Long Lake A (50 units) and Long Lake B (15 units). Nor are we requesting that the Petitioner own and maintain Disy Road and Landing Road both summer and winter, which extends from Route 161 to the public Cross Lake Boat Landing and the existing camp lots on Mif's Lane (and the one camp lot south of the boat landing), as well as the proposed residential development areas of Cross Lake D (35 units) and Cross Lake E (60 units).

We only request that the *division* of road ownership, maintenance responsibilities and requirements be designated in the Concept Plan when/if the existing camp lots or a parcel or parcels in a related development area are sold, since this is the *only* opportunity to put into writing those divisions, responsibilities and requirements *before* any parcels or lots are sold, and thus avoid potential confusion and/or conflicts precipitated by the very provisions in the Concept Plan that guarantee and improve public access to those locations.

## 2) *Subtopic: Anticipated Change in Intensity and Types of Use of Lakes*

There is no question that added dwellings in the residential development areas on all of the lakes in the Concept Plan and Yexas development on Square Lake will change the *intensity* of overall use of each lake. Additional provisions should be added to the Concept plan to reduce that impact. As such, we request the Commission consider the following:

### a) Allow Only Private Water Access Sites in Residential Development Zones (D-FRL-RS)

As stated above, remove all public or commercial uses allowed in the residential development zones for water access sites and only allow private uses to serve the residential development zone where the water access site is located.

### b) Consultation with Governmental Review Agencies

When a subdivision application is submitted that includes a proposed water access site, the Commission should require consultation with governmental review agencies, including but not limited to: Bureau of Parks and Lands (BPL), Department of Inland Fisheries and Wildlife (DIFW), Department of Environmental Protection (DEP), Maine Natural Areas Program (MNAP), and State Soil Scientist regarding the locations of proposed water access sites and the types and numbers of proposed shoreland structures. A written statement should be submitted to the Commission summarizing the advice of these governmental review agencies and explaining how this advice was taken into consideration in development of the proposed water access site.

### c) Document Boating Levels & Determine Carrying Capacity using WALROS System

When a subdivision application is submitted that includes a proposed water access site, the Commission should also require documentation of the existing boating levels in that section of the lake, and in consultation with the BPL and DIFW, estimate the ‘carrying capacity’ of that section of the lake (where ‘carrying capacity’ is the maximum number of boats on the water at one time), to ensure that the carrying capacity will remain within the Commission agreed upon Water Recreation Opportunity Spectrum (WALROS) designation for each and all of the specific portions of the lake referenced in the Concept Plan.

## 3) *Subtopic: Anticipated Effect on Recreation Uses and Experiences*

**Cross Lake E and Square Lake Development Areas.** Related to the above subtopic, there are two locations in the Concept Plan area where a change in both the *intensity* and *types of use* will most affect the current recreation uses and experiences and we would ask the Commission to carefully consider the amount of proposed development in these locations.

From the Commission’s Comprehensive Land Use Plan (CLUP), **Section 5.9.E Recreational Resource Issues**, “The most obvious kinds of impacts from recreational uses and facilities are those that cause harm to surroundings and natural resources (for instance, trail and campsite damage, shoreline erosion, water pollution, and harm to fish and wildlife) and those that, while not causing serious environmental damage, may affect the *recreational experiences for other users* [emphasis added] (including noise, smells and emissions, trash, lighting, and other visual effects). But there are also impacts that result in the incremental loss of *natural character values and a sense of remoteness* [emphasis added] which, once lost, are difficult if not impossible to

restore. These types of impacts are difficult to quantify and tend to occur slowly and cumulatively, making them a challenge to detect.”

Also, under the same section regarding impacts of development, “Potential impacts of development include adverse effects on natural resources and diminishment of remote and natural character values [emphasis added], which enhance — and are often essential for — the recreational experience.” And “The construction of new roads and utility lines associated with development and other land uses can also greatly impact recreational resources, especially where such construction creates new access to areas with significant resource values. New or improved travel routes can lead to unexpectedly high levels of use, or ultimately to increased pressure for residential development.”

**Cross Lake E.** The south end of Cross Lake is undeveloped and considered a remote, scenic section of the lake by current users. Most users go to that area of the lake for wildlife viewing, quiet boating, foliage viewing in the fall, and fishing (since it’s the deepest and therefore the least impaired part of the lake). This area most often has eagles and ospreys. The proposed 60 unit Cross Lake E development will not only change the intensity of use in this area, but also the types of use, since quiet boating may not be the norm with that many added users, resulting in a reduction in the overall quality of recreational opportunities and the natural character of this portion of the lake forever, therefore, having an “undue adverse impact on existing uses or resources.”

**Square Lake.** Since Square Lake is primarily an unspoiled, remote and mostly undeveloped lake, the amount of proposed development on this lake will not only change the intensity of use, but also the types of use of the lake. Most of the people who use Square Lake currently visit the lake for fishing, wildlife viewing, or quiet boating in a natural setting, free of development and some of the resulting noisy recreational uses, such as jet skis and power boats pulling water skiers and people tubing. With the amount of development proposed on Square Lake (130 units), this is sure to change. We are not proposing no development on Square Lake, but simply wish to point out that the amount of proposed development may irrevocably change the recreational use of Square Lake resulting in a reduction in the overall quality of recreational opportunities and the natural character of the lake forever, therefore, having an “undue adverse impact on existing uses or resources.”

**Considerations for Cross Lake E and Square Lake.** We listed some considerations for each of these proposed development areas in our testimony under Topic Two and ask the Commission to carefully consider our suggested possible remedies to the concerns we expressed in Topic Two, as well as the concerns also stated here under Topic Three regarding the proposed development areas’ effect on the *recreational uses* and *experiences* and *natural character* of these two areas.

#### ***4) Subtopic: Effect on Character of Lakes (including Scenic Impacts of Hillside Development) and User Experience***

##### **a) Scenic Impact of Hillside Development**

From the CLUP, **Section 4.9.C Hillside and Ridge Development**, “Hillside and ridge development can have significant impacts on the natural resources, recreational resources and character of an area. Houses located on hillsides often have associated vegetation clearing that makes development highly visible from public roads and waters. Further, the construction of long roads, often traversing steep slopes, necessary to access this development can cause erosion, generate increased phosphorous, carve up wildlife habitats, and decrease the visual quality of the landscape visible from public resources. While the Commission currently has scenic impact

standards that apply to hillside development, these standards are not prescriptive, and thus do not provide the Commission or applicants with much regulatory predictability.”

Although we appreciate the plan amendments that further regulate potential visual impacts from hillside development, they are also descriptive and not prescriptive. Hillside developments in Long Lake A, B, and C, Cross Lake D and E, and Square Lake E and W *will* be seen from the lakes, and the new units with vegetation clearing, roads, and associated lights *will* negatively impact the scenic resource of an unbroken view of forest on these hills that boaters and existing camp owners currently enjoy.

We would request the Commission give consideration to one change, as well as one addition that was mentioned in the plan amendments, but not included in them.

1. **Steep Slopes.** The Hillside Development Section 10.34(B)(6)(h) in the Concept Plan Amendments states: “Slopes greater than 20% should be avoided (e.g., wherever possible, development should be located in areas where sustained slopes are less than 15%; development may not be allowed on slopes in excess of 25%).”

As with our concern about clustered shoreland development on steep slopes, discussed in our Topic Two testimony, we are also concerned about hillside development on backland steep slopes and would ask the Commission to consider not allowing hillside development on slopes in excess of 20%, to help limit scenic impacts and impacts to water quality from erosion and other soil limitations. The Commission retained Sebago Technics to review the slope and soil suitability analysis in the Concept Plan and their report stated, “All slopes over 20% were considered not suitable for development due to constructability considerations, erosion and sedimentation control, controllability of drainage and due to the Maine State Wastewater Disposal Rules deeming slopes of 20% or greater unsuitable for septic systems.”

Indeed, 15% slopes as unbuildable land is suggested in two different sections of the plan itself, as follows: (1) The ARC *Soil Suitability Evaluation Update* in Exhibit D of the Concept Plan identifies slopes greater than 15% as “*Generally Unsuitable*” for development due to steep slopes, and (2) **Erosion and Sedimentation Control**, Subchapter III 10.25(M)(1)(a) states, “Operations that result in soil disturbance shall be avoided or minimized in sensitive areas such as slopes exceeding 15% and areas that drain directly into water bodies, drainage systems, water crossings, or wetlands.”

2. **Education, Enforcement & Inspections.** The Concept Plan amendments under Section E(1)(a)(ii)(g) state: “Education and enforceability of these hillside development provisions will also be addressed.” However, there are no provisions regarding education and enforceability in the Concept Plan or the Amendments, and these should be added. Also, as with potential violations of the Phosphorus Control Plan (which we discussed in Topic Two testimony), we propose that, either separately or as part of the annual inspection for compliance with the Phosphorus Control Plan, an independent qualified third-party inspector perform an on-site survey of all lots and common areas and prepare a report submitted to the Land Use Planning Commission (LUPC) and DEP regarding compliance or noncompliance with all standards related to hillside development, including but not limited to: Hillside Development (Subchapter III, Section 10.34), Erosion and Sedimentation Control (Subchapter III 10.25(M)), Vegetation Clearing (Subchapter III, 10.27(B)), Roads and Water Crossings (Chapter 10, Section 10.27(D)), and Vehicular Circulation, Access and Parking (Chapter 10, Section 10.25(D)).

**b) Effect on Character of Lakes and User Experience**

Although the proposed additional development will affect user experience in Van Buren Cove on Long Lake and in the northern half of Cross Lake, due to the increase in boating activity and vehicle traffic on the camp roads, the *character* of those areas of the lakes will not likely change (e.g. swimmers, kayakers, fishing boats, pontoon boats, jet skis, and power boats with water skiers and tubing). However, much of the Commission’s policies, goals, and guidelines regarding the principal value of *remoteness* expressed in the CLUP and Concept Planning & Guidance document discussed under Topic Two, also apply to the *character* of the south end of Cross Lake and all of Square Lake.

Since the new houses in the proposed developments will not be the typical small “seasonal camp” of the past, their impact will be greater, especially in remote areas. As stated in the CLUP **Section 4.9.E Changing Character of Development**, “The “typical camp” appears to be changing, as reflected in new construction and expansions and upgrades of existing camps. The trend is toward larger houses, most of which are built for four-season use. More of these new camps have full foundations, two stories and larger footprints (Figure 5). The changing nature of development could affect the jurisdiction’s distinctive resources and features. The larger footprints associated with more recent development have proportionately greater impacts on natural resources. Larger structures with full foundations generate more runoff. They are often more visible, and can significantly alter the distinctive character of remote areas [emphasis added]. Fire suppression efforts involving larger structures in remote areas are much more challenging. And increased investment in houses may signal growing interests or changing expectations regarding the provision of services and infrastructure that characterize more developed areas.”

Also relevant is this statement in the Lake Management Program regarding Lake Management Goals, “In reviewing development proposals *on or near lakes* [emphasis added] which fall into one of the Commission’s seven lake management classifications, the Commission will seek to ensure that the proposed activity is consistent with the stated management intent for that class of lake.” Cross Lake is in the ‘Heavily Developed Lake’ management class and the Commission’s goal is to, “...maintain natural qualities associated with these lakes, enhance scenic values, and retain some undeveloped shoreline by requiring cluster development on these lakes except where clearly inappropriate due to site characteristics.”

Instead of repeating earlier testimony regarding the remoteness of the south end of Cross Lake and all or most of Square Lake, we instead quote directly from the Concept Plan, **Volume 1, Appendix C Evaluation of Impacts to Recreation**, and also note that a license holder on Square Lake will speak specifically about why that lake is so special and different than either Long Lake or Cross Lake.

1. **South End of Cross Lake.** From Appendix C regarding the south end of Cross Lake: “Approximately 20% of the lake (465 acres) south of the boat launch is considered Semi-Primitive Motorized (Rural Natural). Local residents report that there are typically between 1 and 5 boats in this part of the lake during the boating season. If residential development were to occur at the southern end of the lake (Cross Lake E), it is likely that this area would see an increase in the number of boaters.” This ‘Rural Natural’ classification was determined using the WALROS system, which classifies lakes and boating capacity based on a user’s recreational experience and one of the ‘local residents’ happens to be me.

Also from Appendix C, “...the presence of development on the hillside above the lake may cause the classification to move toward Rural Developed [emphasis added]....The main group of people who

would be affected by this shift are those who use the beach at the southern end of the lake and those who enjoy boating in a more natural appearing landscape.” And, “Some current residents may find this shift undesirable; likewise, others may find the anticipated development and the opportunities that accompany it very desirable. The application of the Chapter 10 Addendum standards for hillside development, home siting, water access facilities, and other forms of infrastructure will be important to preserve the character of the southern end of the lake in order to minimize impacts to its recreation and visual character.”

It is our belief that if the south end of Cross Lake is developed past the public boat landing, the WALROS classification *will* change from ‘Rural Natural’ to ‘Rural Developed’ and application of the hillside development standards will *not* preserve the remote character of this area of Cross Lake. We do not believe this is consistent with the stated management intent for Cross Lake, which is an already ‘Heavily Developed’ lake. This area of the lake will be irrevocably and unduly impacted by the extent and location of the proposed development in Cross Lake E, both by the number of added boats on the lake and by the considerable amount of development, up to 60 houses (or more counting the 35 units in Cross Lake D), with hillside development comprising essentially all of that development.

2. **Square Lake.** Quoting again from Appendix C regarding Square Lake, “Future development associated with the Concept Plan has the potential to cause some unfavorable impacts on the visual and recreational resources associated with the lake and surrounding lands”:

- “Visual impact from new development, primarily Square Lake E.”
- “Additional development opportunities will bring more people and waterfront activity to the lake. The 130 additional housing units that could be built on Square Lake represent a substantial increase in the number of existing residences on the lake.”
- “Additional development and boating traffic may affect the quality of the recreational experience, especially in the southern half of the lake where there is currently no development.”

We agree with the LUPC staff suggestion in the Concept Plan Amendments that the northern half of Square Lake should be considered ‘Rural Natural’ and the southern half should be considered ‘Semi-Primitive’ according to the WALROS system. We disagree with the amendment assertion that at ‘full build out’ of 130 new houses (approximately 2½ times the number of camps on the lake now), the proposed developments will keep the southern half of the lake within the Semi-Primitive WALROS class of 8-36 boats. In our experience most boaters tend to stay close to home (e.g., most of the boaters in the north end of Cross Lake stay in the north end) and this is especially true on Square Lake due to its extremely unpredictable and often dangerous wind and wave conditions. Using the boat numbers in the addendum, an anticipated 49 boats could be expected in the southern half of the lake (15 from the new trailered facility, 19 from the new units, and 15 from boats for lease), not counting any boats at all from the existing camps on the lake or boats coming from Cross Lake. It is our belief that the *remote* character of Square Lake, especially the south end of the lake, will *not* be preserved, both by the number of added boats in this area and by the amount of hillside development.

**Considerations for Cross Lake E and Square Lake.** We listed some considerations for the proposed developments in these areas in our Topic Two testimony and ask the Commission to carefully consider the concerns also stated here under Topic Three regarding the proposed development areas’ effect on the *recreational uses and experiences* and *natural character* of these two locations.



## CONCLUSIONS

1. **Allow Public Access Only at Locations Historically Used and/or Designated for Public Access.** Public access to the lakes in the plan area should only be permitted at locations historically used and/or specifically designed and designated for public access, such as Long Lake Beach or Cross Lake Boat Landing.
2. **Public Access Roads Shared with Existing Camp Owners.** The Commission should consider requiring added provisions to the plan designating ownership and maintenance responsibilities and requirements of roads to public areas shared with existing camp owners when/if the existing camp lots or a parcel or parcels in a related development area are sold, while considering the potential impacts to existing camp owners of the petitioner possibly closing those roads.
3. **Allow Only Private Water Access Sites in Residential Development Zones.** All public or commercial uses allowed in the residential development zones for water access sites should be removed from the plan and only private uses to serve the residential development zone where the water access site is located should be allowed.
4. **Consultation with Governmental Review Agencies.** When a subdivision application is submitted that includes a proposed water access site, the Commission should consider requiring consultation with governmental review agencies, including but not limited to: BPL, DIFW, DEP, MNAP, and the State Soil Scientist regarding the locations of proposed water access sites and the types and numbers of proposed shoreland structures. A written statement should be submitted to the Commission summarizing the advice of these governmental review agencies and explaining how this advice was taken into consideration in development of the proposed water access site.
5. **Document Boating Levels & Determine Carrying Capacity using WALROS System.** When a subdivision application is submitted that includes a proposed water access site, the Commission should consider requiring documentation of the existing boating levels in that section of the lake and, in consultation with the BPL and DIFW, ensure that the 'carrying capacity' will remain within the Commission's agreed upon WALROS designation for each and all of the specific portions of the lake referenced in the Concept Plan.
6. **Hillside Development on Steep Slopes.** The Commission should consider not allowing development on slopes in excess of 20% to lessen the scenic impact and potential impacts to water quality due to erosion.
7. **Hillside Development Education, Enforcement & Inspections.** The Commission should require inclusion of provisions regarding education and enforceability in the plan (as stated in the amendments) and annual inspections for compliance with the standards related to hillside development.
8. **Effect on Recreation Uses, Experiences, & Character of Cross Lake E and Square Lake Areas.** As discussed under Topic Two regarding the relative *remoteness* of these two areas, the Commission should carefully consider the amount and location of the proposed development in these locations due to their effect on the *recreation uses* and *experiences*, as well as the *natural character* of these areas.

OATH

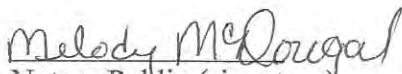
State of Maine  
County of Aroostook

I, Cheryl L. St. Peter, being first duly sworn on oath, affirm that the foregoing pre-filed testimony is true, accurate, and correct to the best of my knowledge, information, and belief.

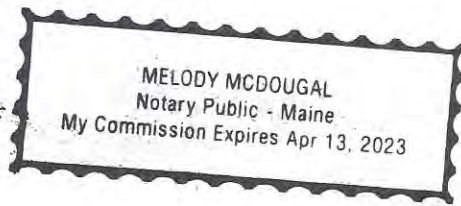
  
Signature

Cheryl L. St. Peter  
Name (printed)

Sworn to and subscribed before me this 2 day of May, 2018.

  
Notary Public (signature)

Melody McDougal  
Notary Public (printed name)

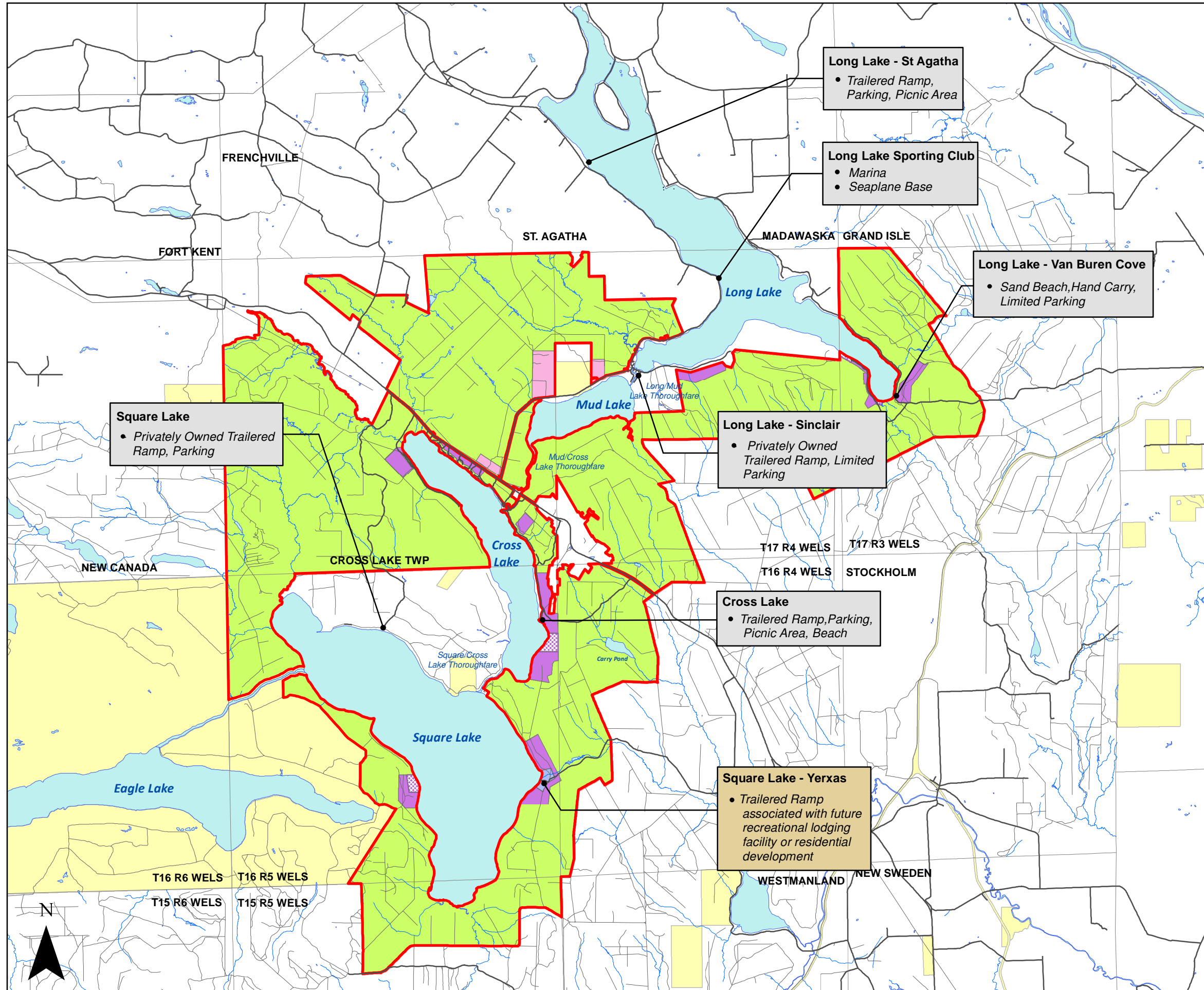


## **EXHIBITS**

**(20 Maps & Photos)**


# Publicly Accessible Water Access Sites

## Fish River Chain of Lakes Concept Plan




### Legend

- Major Roads
- Streams
- Secondary Roads
- Water Bodies
- Proposed Square Lake Yexas Area
- Proposed Community Economic Development
- Proposed Residential Areas
- Proposed Residential Open Space
- Maine Public Reserve Land
- Concept Plan Area
- Existing Water Access Sites
- Potential Water Access Site



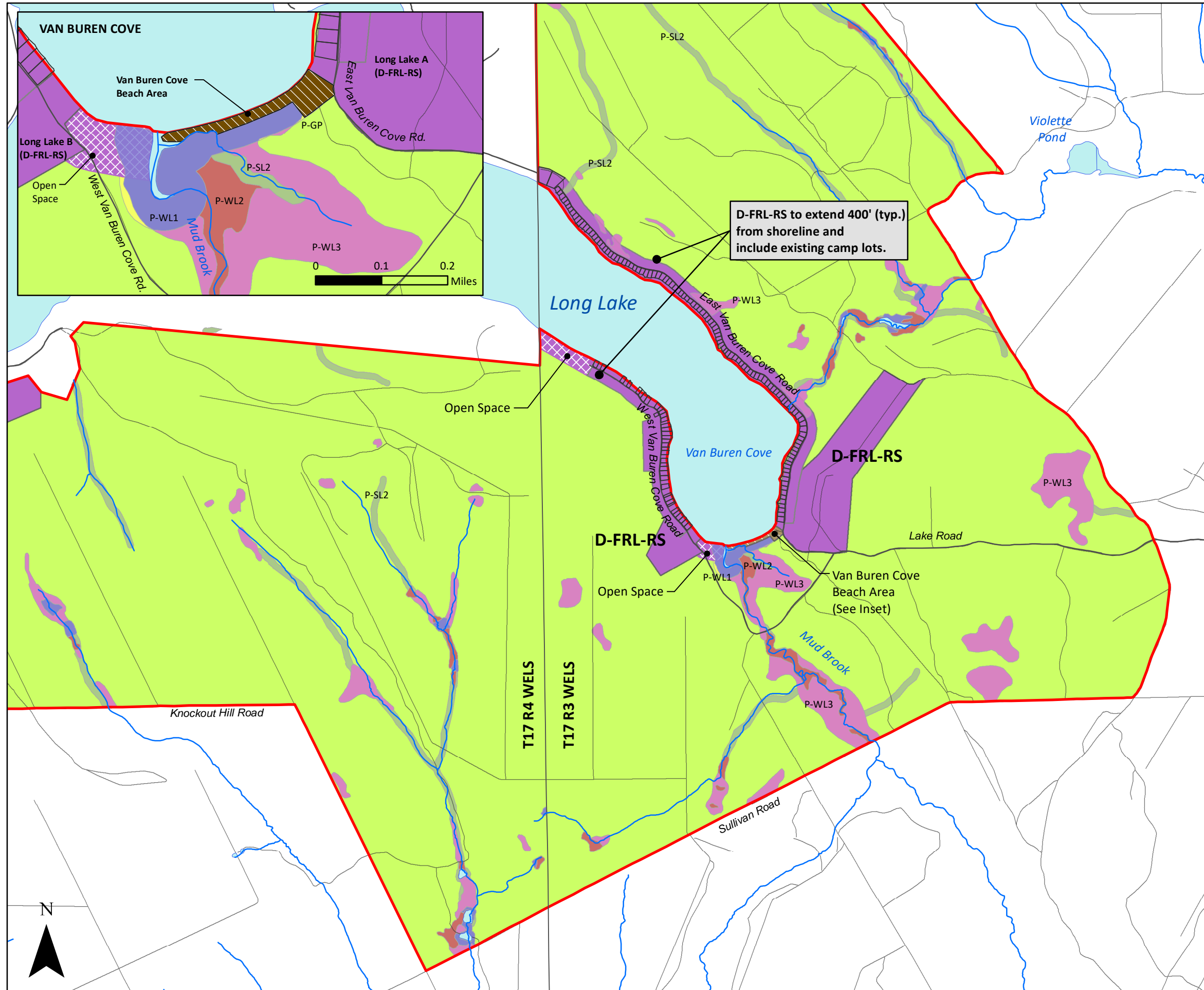
IRVING WOODLANDS, LLC

0 0.75 1.5 3 Miles



April 2018

**MAP 34**



# PROPOSED LAND USE ZONES

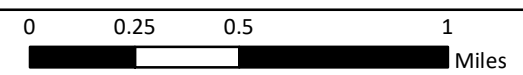
## Detail Plan A

### Fish River Chain of Lakes Concept Plan

#### Legend

- Major Roads
- Secondary Roads
- Existing Camp Lots
- Concept Plan Area
- Proposed D-FRL-RS
- ▨ Proposed Residential Open Space
- ▩ Van Buren Cove Beach
- P-GP: Great Pond Protection
- P-SL2: Shoreland Protection
- P-WL1: Wetland Protection
- P-WL2: Wetland Protection
- P-WL3: Wetland Protection
- Proposed M-FRL-GN

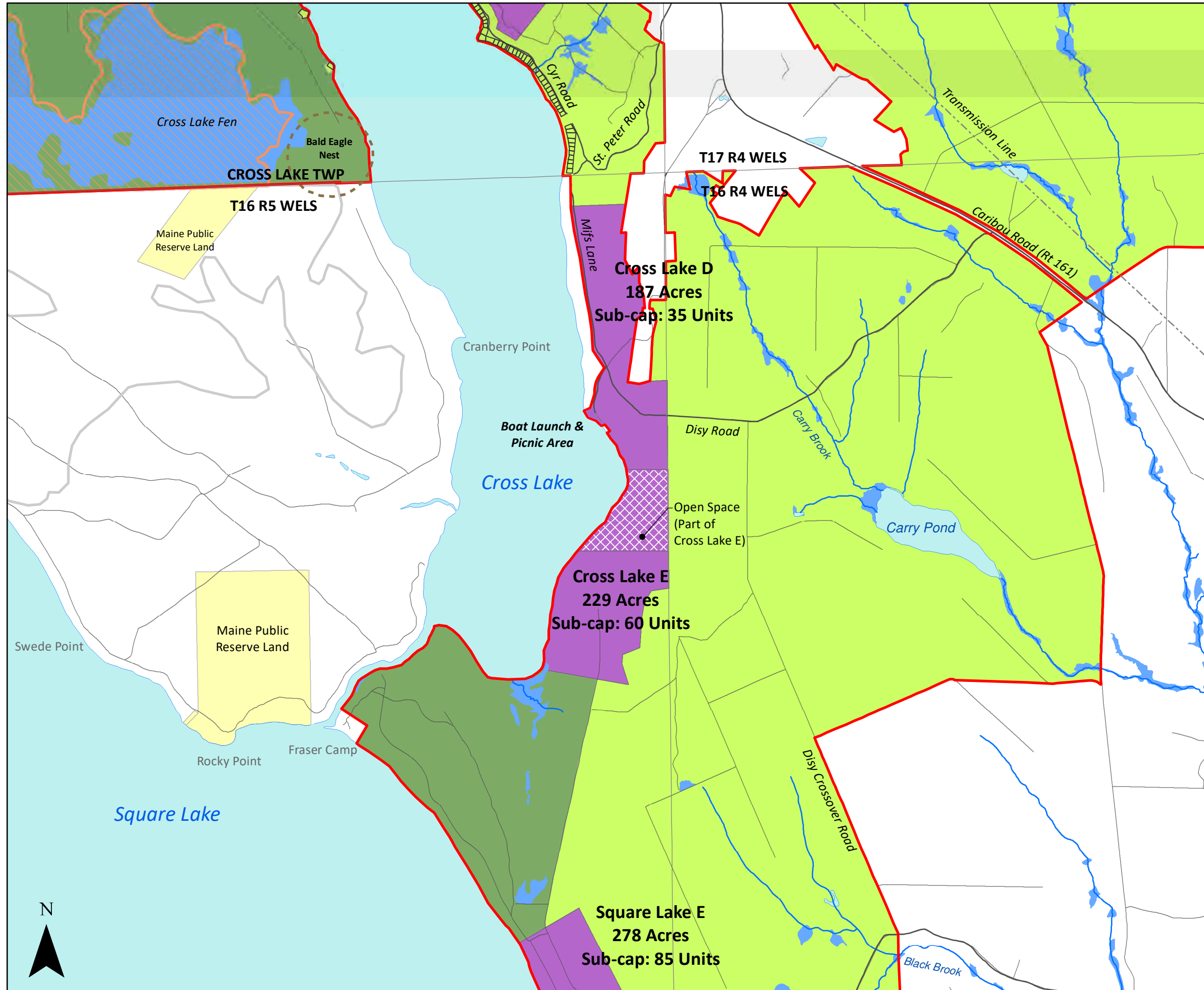
- #### Notes
1. Plan area will be rezoned to P-RP (Resource Plan Protection)
  2. Proposed D-FRL-RS includes lands currently zoned D-RS



April 2018

MAP 27





# DEVELOPMENT AREAS

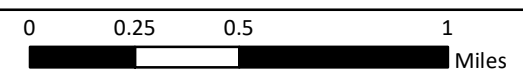
## Detail Area D

### Fish River Chain of Lakes Concept Plan

**Legend**

- Major Roads
- Secondary Roads
- - - Transmission Line
- Streams
- Wetlands
- Existing Camp Lots
- ▨ Irving Unique Areas
- Nesting Site
- Proposed Residential Development Areas
- ▨ Proposed Open Space
- Maine Public Reserve Land
- Conservation Easement Area
- Concept Plan Area

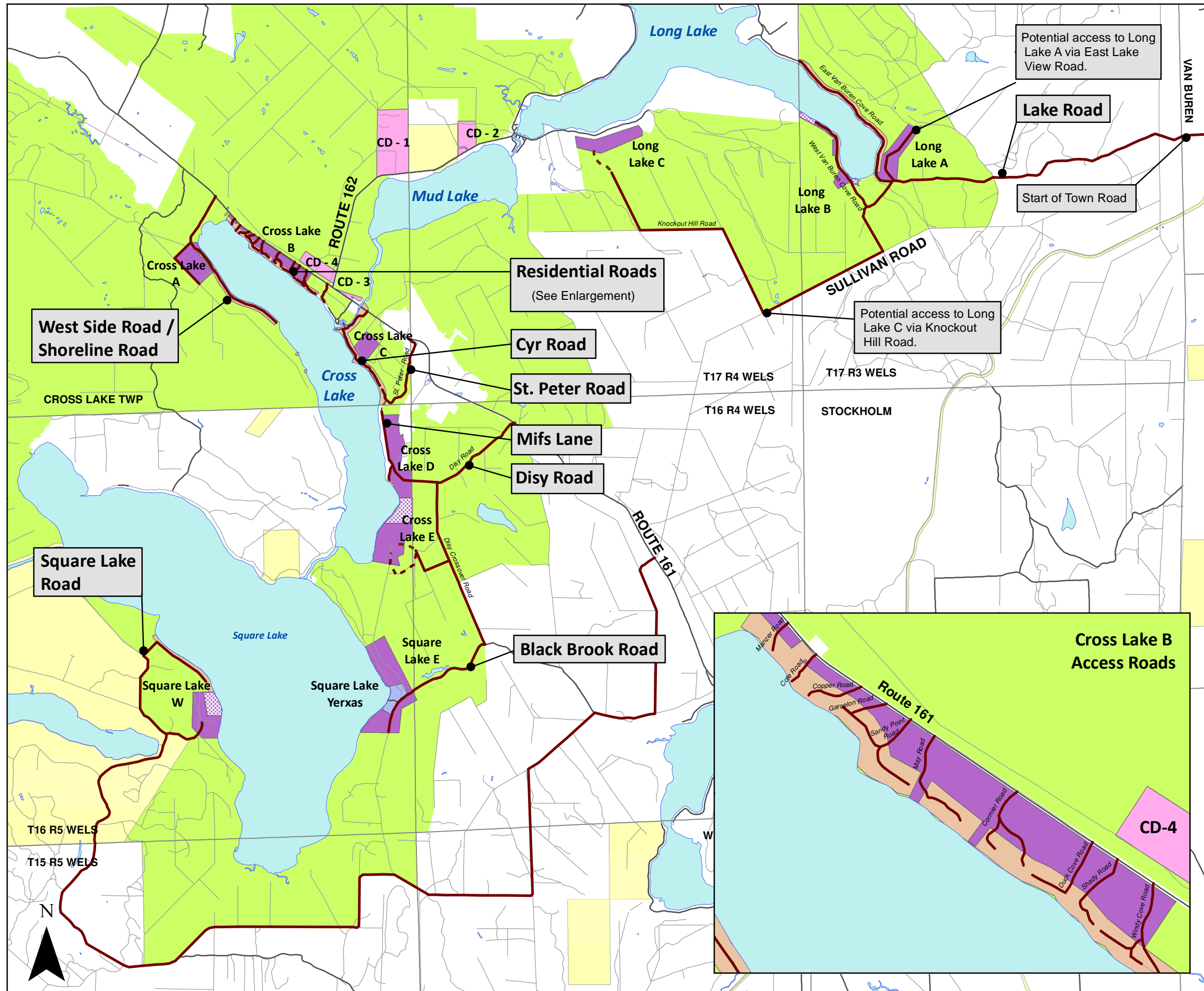
- Notes**
1. The total number of new Development Units within the proposed residential development areas (including Square Lake Yexas) is capped at a maximum of 330 units.
  2. Maximum number of new Development units for Cross Lake: 125 Units.
  3. See Maps 14-17 for existing zoning and Maps 27-31 for proposed land use zones.











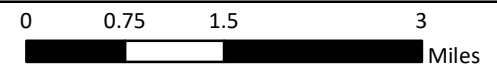
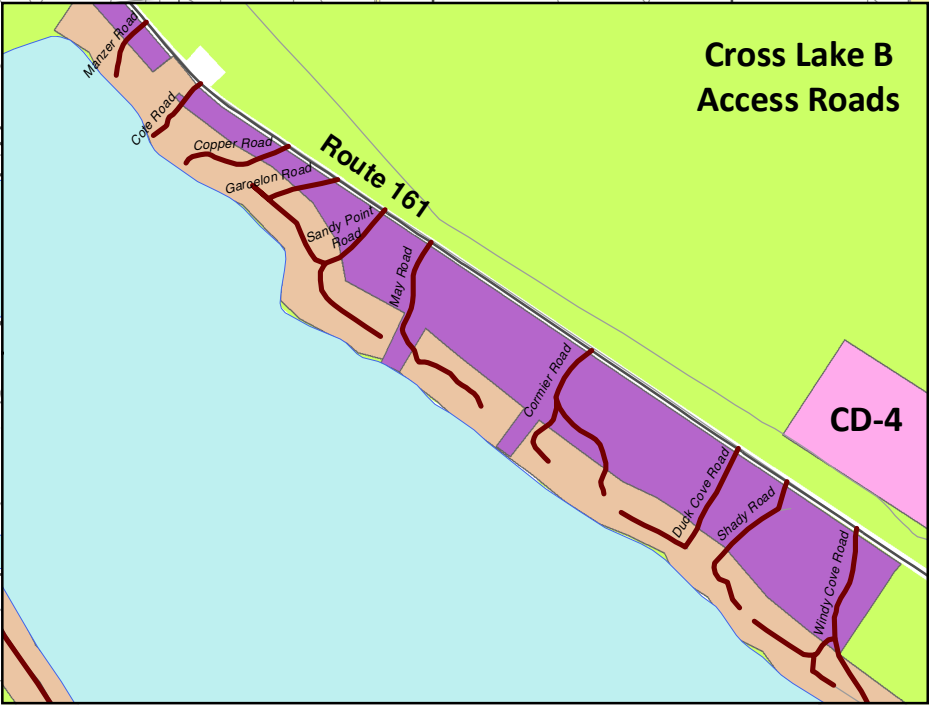
# ACCESS TO DEVELOPMENT AREAS

## Fish River Chain of Lakes Concept Plan

**Legend**

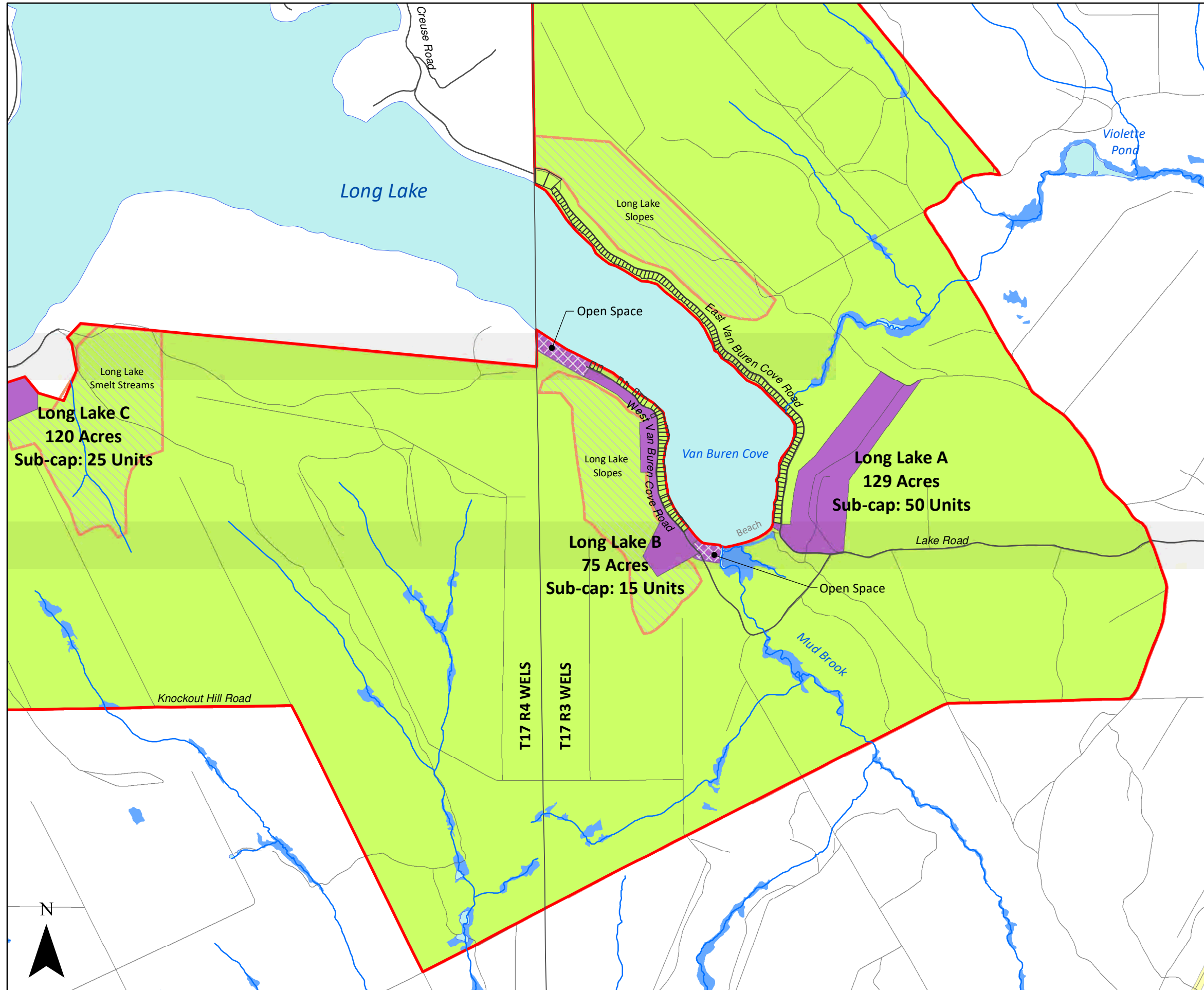
- Potential Access to Development Areas
- Existing Woods Road
- Proposed D-FRL-RF (Yerxas)
- Proposed Comm/Econ Development Areas
- Proposed Residential Development Areas
- Proposed Residential Open Space
- Existing/Expanded D-FRL-RS
- Maine Public Reserve Land
- Concept Plan Area

- Notes**
1. Access to CD-1, 2, 3, and 4 to be off off State Roads or other existing roads.
  2. Petitioners can not grant access over the Maine Public Reserve Land.
  3. Development of Square Lake West may require a dedicated parking area for possible boat access for Square Lake West residents in Square Lake East.



April 2018

MAP 36



# DEVELOPMENT AREAS

## Detail Area A

### Fish River Chain of Lakes Concept Plan

**Legend**

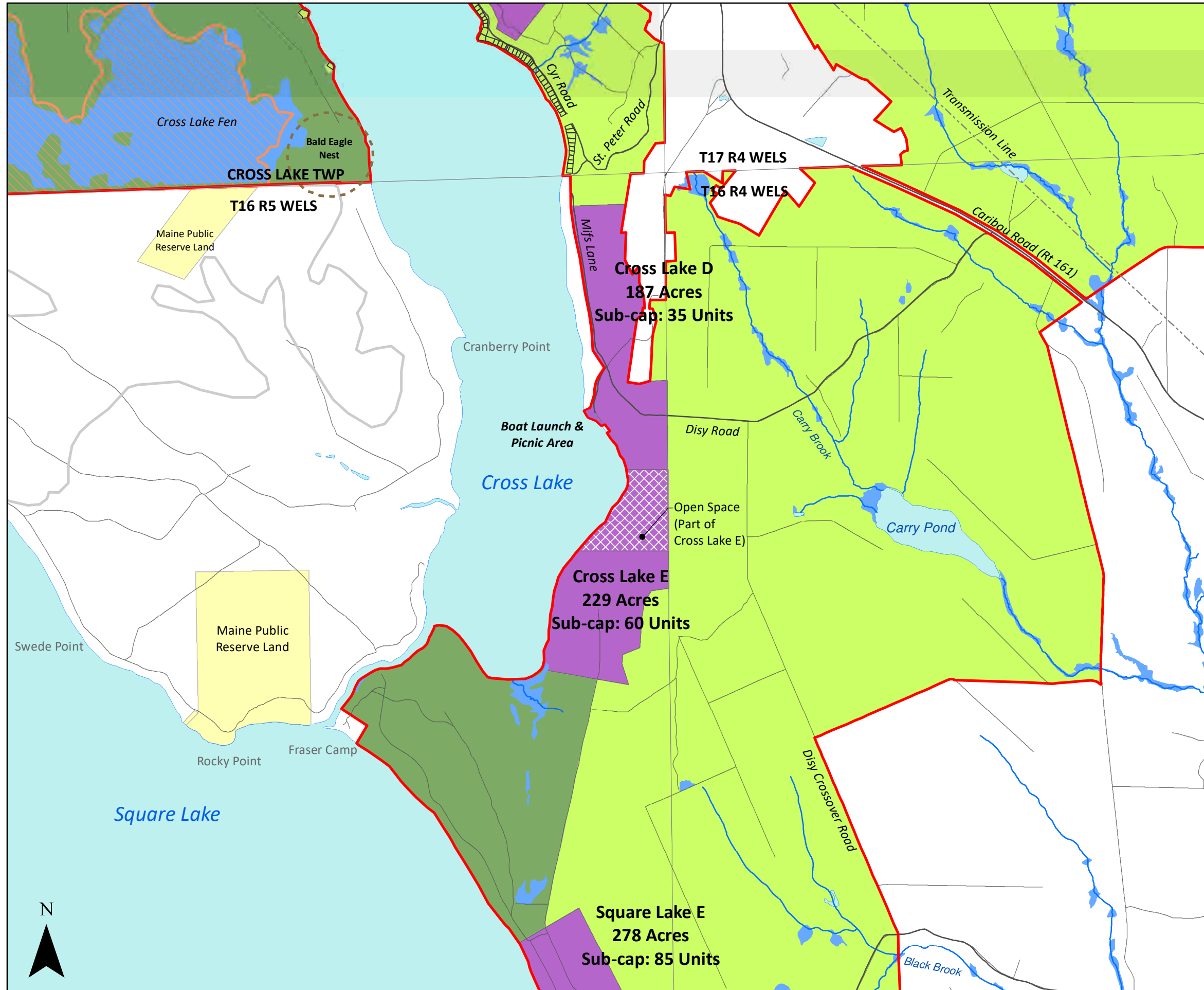
- Major Roads
- Secondary Roads
- Streams
- Wetlands
- Existing Camp Lots
- Proposed Residential Development Areas
- ▨ Proposed Open Space
- ▨ Irving Unique Areas
- Concept Plan Area

- Notes**
1. The total number of new Development Units within the proposed residential development areas (including Square Lake Yexas) is capped at a maximum of 330 units.
  2. Maximum number of new Development units for Long Lake: 75 units.
  3. See Maps 14-17 for existing zoning and Maps 27-31 for proposed land use zones.

**IRVING**  
IRVING WOODLANDS, LLC

0 0.25 0.5 1 Miles

April 2018 **MAP 22**



# DEVELOPMENT AREAS

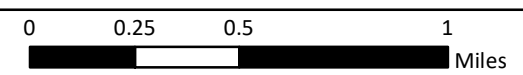
## Detail Area D

### Fish River Chain of Lakes Concept Plan

**Legend**

- Major Roads
- Secondary Roads
- - - Transmission Line
- Streams
- Wetlands
- Existing Camp Lots
- ▨ Irving Unique Areas
- Nesting Site
- Proposed Residential Development Areas
- ▨ Proposed Open Space
- Maine Public Reserve Land
- Conservation Easement Area
- Concept Plan Area

- Notes**
1. The total number of new Development Units within the proposed residential development areas (including Square Lake Yexas) is capped at a maximum of 330 units.
  2. Maximum number of new Development units for Cross Lake: 125 Units.
  3. See Maps 14-17 for existing zoning and Maps 27-31 for proposed land use zones.



April 2018

MAP 25



South End • Conservation Easement • Cross Lake E





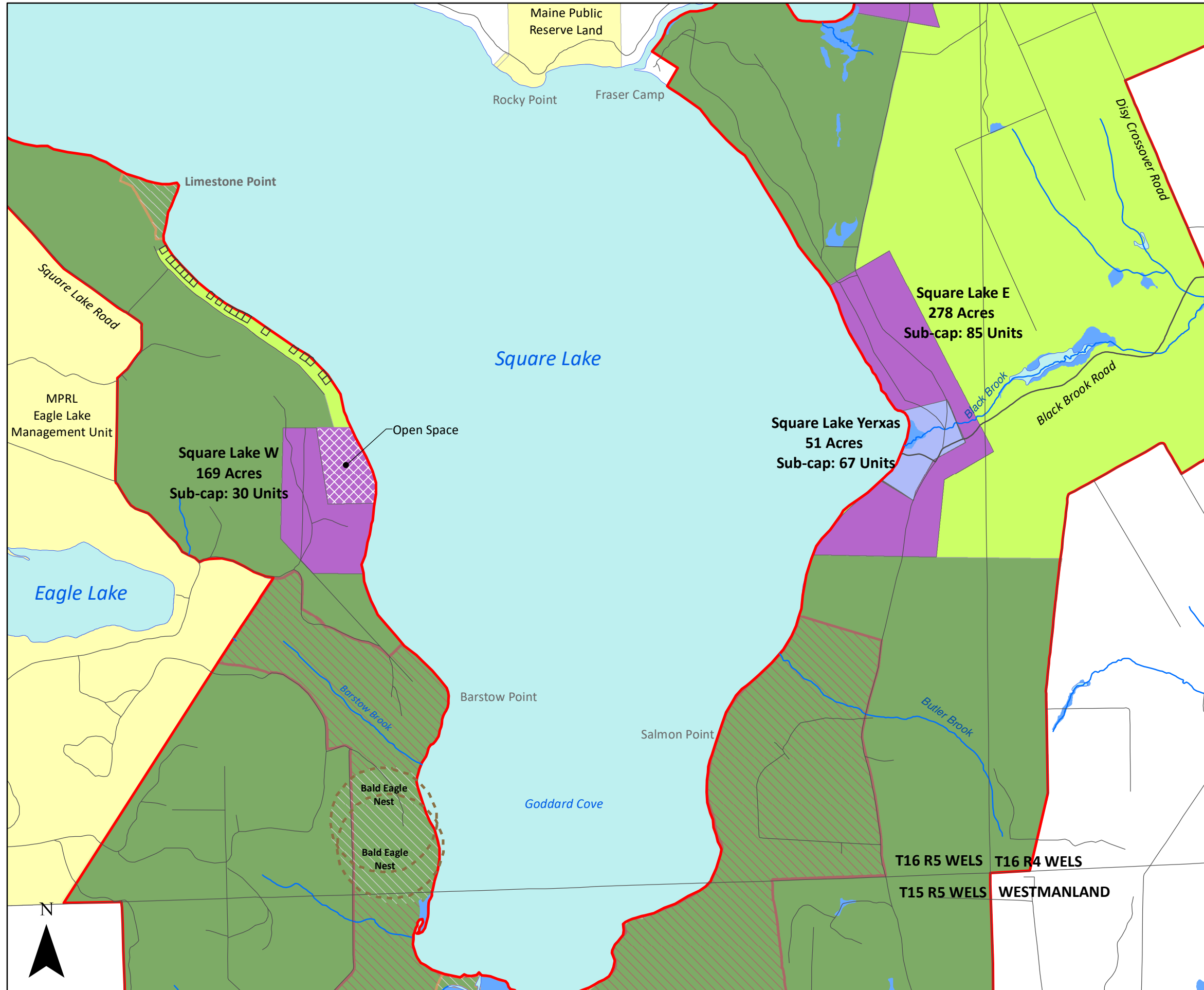








09/29/2009



# DEVELOPMENT AREAS


## *Detail Area E*

### Fish River Chain of Lakes Concept Plan

**Legend**

- Major Roads
- Secondary Roads
- Streams
- Wetlands
- Existing Camp Lots
- ▨ Irving Unique Areas
- ▨ Deer Wintering Areas
- Proposed Square Lake Yexas Area
- Proposed Residential Development Areas
- ▨ Proposed Open Space
- Maine Public Reserve Land
- Conservation Easement Area
- Concept Plan Area
- Nesting Site

- Notes**
1. The total number of new Development units within the proposed residential development areas (including Square Lake Yexas) is capped at a maximum of 330 units.
  2. Maximum number of new Development units for Square Lake: 130 Units.
  3. See Maps 14-17 for existing zoning and Maps 27-31 for proposed land use zones.

  
 IRVING WOODLANDS, LLC

0 0.25 0.5 1  
 Miles

April 2018 **MAP 26**



**Dramatic Setting • Potential Water Access • Abundant Natural Resources**





**Square Lake West: 2.7 miles • Hillside Development**

