

**STATE OF MAINE
LAND USE PLANNING COMMISSION**

Irving Woodlands LLC)	FISH RIVER LAKES LEASEHOLDERS
Proposed Fish River Lakes Concept Plan)	ASSOCIATION
Zoning Petition ZP 768)	TOPIC TWO PRE-FILED TESTIMONY
)	<u>Potential Resource Impacts, Impact</u>
)	<u>Minimization Efforts, and Conservation</u>

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: Extent and Location of Proposed Development Areas*

Cross Lake E and Square Lake Remoteness & Relative Absence of Development (a Principal Value):

Considering the extent and location of the development proposed in Cross Lake E and in Square Lake, the Commission should carefully consider the *remoteness* and *natural character* of these areas.

2) *Subtopic: Resource Impacts – Fisheries & Water Quality, Impacts of Shoreland Lots*

- a) **Fisheries & Water Quality:** We share the concerns raised by Maine Department of Inland Fisheries and Wildlife (MDIFW) regarding the lakes' fisheries, especially the protection of brook trout habitat and increased angling pressure due to the amount of proposed development. Considering that Cross Lake already has impaired water quality, the Commission should consider requiring annual water quality monitoring and compliance inspections of any development, and require those reports be submitted to the Land Use Planning Commission (LUPC) and the Department of Environmental Protection (DEP), and be made available to the public, as well as not allowing an increase in the development areas' "Total Phosphorus Budget" on a 1:1 basis by any mitigation project in the Cross Lake watershed.
- b) **Impacts of Shoreland Lots (Steep Slopes & Existing Camp Lots):** The Commission should consider reducing the impact of new shoreland lots by keeping the current standard of 20% slopes as unbuildable land in "clustered developments." Likewise, we ask that the Petitioner consider allowing abutting camp owners second option on any adjoining lots not purchased by the current license holder at the time of sale, to help make the existing shorefront lots conforming or less nonconforming with the applicable Commission requirements.

1) Subtopic: Extent and Location of Proposed Development Areas

Cross Lake E and Square Lake Remoteness & Relative Absence of Development (a Principal Value)

According to the Commission's Comprehensive Land Use Plan (CLUP) **Section 7.1.A Guiding the Location of Development**: "The Commission has concluded that the principal development issue is not the amount of development taking place in the jurisdiction, but rather where it is located."

The FRLLA has concerns with both the extent and location of the proposed development in Cross Lake E and Square Lake. These concerns are primarily based on the importance of the relative *remoteness* and *natural character* of these areas, best expressed in the excerpts below taken from the CLUP and Concept Planning Overview & Guidance document.

One of the Commission's four principal values in the CLUP is "Natural Character" and under that value are the following statements: "Remoteness and the relative absence of development in large parts of the jurisdiction are perhaps the most distinctive of the jurisdiction's principal values, due mainly to their increasing rarity in the Northeastern United States. These values may be difficult to quantify but they are integral to the jurisdiction's identity and to its overall character."

In the Concept Planning Overview & Guidance document, under Evaluating the Location of Places Inappropriate for Development, two of the four, "Places that are especially sensitive to development impacts" include:

- "Shores and viewsheds of remote portions of accessible and developed lakes..." and
- "Areas especially valued for recreation in largely undeveloped yet accessible settings."

The south end of Cross Lake is the very definition of a "remote portion of an accessible and developed lake." The proposed 60 unit Cross Lake E development area is over 3 miles by existing roads to the closest camps and is on a scenic hillside frequented by eagles and osprey, with no development on the other side of the lake and a proposed conserved wetland area between the development and the also conserved thoroughfare to Square Lake. People often kayak, canoe or boat slowly in this area due to its quiet, natural setting and to look for the frequent wildlife.

Square Lake is an area "especially valued for recreation in a largely undeveloped yet accessible setting." The proposed 30 unit Square Lake W development area is also on a scenic hillside frequented by wildlife and is barely accessible, since it would be over approximately 18 miles on rough, not always maintained and never plowed, roads to the closest public road, with the last part of those roads to reach the development located on Maine Public Reserve Land. The 85 unit Square Lake E and 67 unit Yexas development areas on the east side of the lake are about 5 ½ miles from the nearest public road and there are no utilities on Square Lake for any development or the 57 existing camps on the lake.

Therefore, these two places are especially sensitive to development impacts and should be carefully evaluated by the Commission as locations that may be inappropriate for the extent and location of development proposed in the Concept Plan.

The following review criteria are also relevant to the Fish River Lakes and these two locations in particular:

- The Commission’s Chapter 10 Resource Plan Protection Subdistrict (P-RP) criteria for review, section 10.23(H)(6)(e) states: “The plan...in the case of concept plans, includes in its purpose the protection of those resources in need of protection,” and section 10.23(H)(6)(f) holds: “In the case of concept plans, the plan strikes a reasonable and publicly beneficial balance between appropriate development and long-term conservation of lake resources.”
- From the CLUP **Section 4.7B Impacts of Development, Evaluation of Adverse Impacts:**

“Some adverse impacts are easy to identify and to avoid or mitigate; others are difficult to recognize or prevent. Full consideration of adverse impacts requires keeping abreast of scientific research and documentation, while recognizing that many impacts are subtle and incremental. Sometimes, by the time degradation of a value is clearly detected, the value may be lost, or remedial action infeasible. The Commission, therefore, will approach the identification of potential adverse impacts with a balance of good science and reasonable foresight.

In evaluating the impacts of development, the Commission has focused on residential construction because it is by far the most common form of structural development in the jurisdiction. The most prevalent type of residential development – second homes – is most likely to be located in areas with high-value resources [emphasis added].”

...

“Not all of the jurisdiction’s principal values, however, are linked to a distinct physical feature or location, or confined to a particular zoning district....Values such as fish and wildlife habitat, ecological diversity, water quality and forest resources can be significantly affected by development activities that occur outside of specific protection zones or buffers. Values associated with recreation opportunities and remote, undeveloped character [emphasis added] can be similarly affected.”

...

“The potential impacts on principal values for such patterns of development include:

...

- “Negative impacts on wildlife habitat and ecological values due to permanent clearing and conversion of land to development, intrusions into riparian zones and other habitat, and increased erosion and sedimentation.
- Degradation of water quality as a result of incremental development in sensitive watersheds or on lakes with high concentrations of existing development.
- Visual impacts on previously undeveloped roadsides, water bodies, and hillsides.
- Loss of primitive recreational opportunities and natural character values as more remote areas are developed and access is improved.
- Increased demand for community services for dispersed development in more isolated areas, which may result in negative fiscal impacts on communities and taxpayers.
- Rising carbon emissions due to increased vehicular travel between dispersed dwellings and service centers.”

These values must apply to the Fish River Lakes as well, as otherwise “The most likely impacts on the values of these regions are incremental effects on scenic values and water quality, and reductions in the overall quality of recreational opportunities...”

Indeed, the CLUP **Section 4.8.A Changing Landowner Objectives** statement regarding a pattern of dispersing residential development also strikes a chord, as “The result will be 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.”

Lastly, from **Section 4.8.C. Recommended Refinements, Guide Development at the Jurisdiction Level:**

“As part of efforts to guide development to appropriate locations, the Commission will discourage development in areas that are not appropriate for growth. One of the Commission’s goals is to maintain the forest resource, particularly those lands that are well-suited to natural resource-based uses, in a way that preserves its important values. These values include large-scale commercial forestry, ecological diversity and recreation in remote settings [emphasis added]. The Commission will encourage the protection from intensive development those areas of the jurisdiction that are particularly representative of the jurisdiction’s principal values, especially lands valued for their remote and relatively undeveloped condition [emphasis added].

The Commission also recognizes the unique “quality of place” associated with certain areas that have particularly high natural resource values. Some of these areas are experiencing considerable growth pressure because of their attractiveness. The Commission will encourage conservation in some of these areas to protect their unique qualities. The purpose of conservation will be to protect the character and natural values of these areas in the face of increasing development pressure, [emphasis added] without unduly limiting development opportunities where appropriate.”

In consideration of the many references above to the Commission’s principal value of remoteness and preservation of relatively undeveloped areas, the FRLLA requests that the Commission carefully consider the extent and location of the proposed development in the Cross Lake E and Square Lake areas.

Considerations for Cross Lake E. We acknowledge that both the Cross Lake D and E development areas would be the most desirable on this lake due to the possibility of shorefront lots and hillside views of the lakes. By reviewing the potential for secondary development figures in the Concept Plan, Volume 1, Question 12, and the soil maps, we also realize that there are limited alternatives for a 60 unit development like Cross Lake E, principally because the lake is already “Heavily Developed” under the Lake Management Program, with about 47% of the shoreline developed, and because of soil limitations back from the shoreline due to wet areas or steep slopes. Although 2± miles of shoreline will be conserved, with the additional 0.8± mile of proposed shoreline development, approximately 53% of the lake’s shoreline will be developed. To preserve the remaining remoteness and undeveloped nature of the south end of Cross Lake, and due to the lake’s already impaired water quality and classification as “Heavily Developed”, we request that the number of allowed lots in the Cross Lake E development area be carefully examined and subjected to a consideration of whether the density should be reduced or the development area relocated.

Considerations for Square Lake. As proposed, the Concept Plan will conserve 10.6± miles (about 55%) of shoreline on Square Lake and a large amount of land around the lake to prevent future development. Although the proposed 1.7± mile of shoreline development is less than 10% of the total shoreline, the total amount of development (130 units) nevertheless has the potential to dramatically change the character of this lake. The

difficulty of access to Square Lake W, coupled with its location on a scenic and undeveloped hillside, make it a reasonable choice for either special zoning conditions (seasonal and/or primitive camps only, similar to most of those already on the lake) or relocation of the development to a more appropriate portion of the plan area. We would also propose a change to the nature and scale, with consideration of use restrictions, for Square Lake E and Yexas, something similar to the Commission's prospectively zoned Semi-Remote Lake Protection Subdistrict (P-GP2).

We have additional testimony regarding the effect of development in these areas on the *recreation uses and experiences*, as well as the *character* of Cross and Square Lakes, under Topic Three.

2) Subtopic: Resource Impacts – Fisheries & Water Quality, Impacts of Shoreland Lots

The FRLLA has concerns about the proposed residential developments' potential resource impacts to the Fish River Lakes' fisheries and water quality.

a) Fisheries & Water Quality

- 1. Fisheries.** Quoting from the CLUP **Section 5.11 Water Resources**, "Brook trout are a key indicator of water quality as they survive only in the coldest and cleanest water."

The third broad goal of the Commission's policies stated in the CLUP is, "Maintain the natural character of certain areas within the jurisdiction having significant natural values and primitive recreational opportunities." And from the Commission's Wildlands Lake Assessment findings, Square Lake is a lake of statewide significance with an outstanding resource rating for its fishery and both Cross and Long Lakes are lakes of regional significance for their fisheries. The Commission's Lake Management Program in Appendix C of the CLUP states, "The Commission will, at a minimum, specifically consider all natural resource values that received a rating of either "significant" or "outstanding" in the Assessment, and will look for a demonstration that these values will be maintained."

The Maine Department of Inland Fisheries and Wildlife (MDIFW) December 6, 2017 comments on the Concept Plan identify significant concerns regarding the fisheries of the Fish River Lakes and FRLLA shares in these concerns. Specifically, MDIFW stated:

"The Fish River Chain of Lakes forms a unique and important watershed in northern Maine. The Fish River Chain comprises the largest lakes within the developed portion of Aroostook County and has long been known for its outstanding natural resources and recreational opportunities, including fishing, boating, and other pursuits."

"The Concept Plan needs much more resource protection than is currently proposed to offset potential adverse impacts from the extent of development proposed." [emphasis added]

"MDIFW is concerned that the level of development proposed in the Plan has the potential for negative effects on aquatic resources in the region if not otherwise addressed. Increased use of fisheries resources and degradation to habitat in the Plan area could have severe consequences for maintaining wild brook trout populations and quality landlocked salmon fisheries, some of which are of statewide significance... These adverse effects on coldwater fisheries will result in reduced production in wild stocks which

further compounds the issues of increased fishing pressure. Consequently, the current sportfish regulation structure may not be adequate to maintain fisheries at current levels.”

“To properly conserve brook trout throughout the 30-year Plan period and beyond, there must be increased habitat protection in the tributaries of the affected lakes.” [emphasis added]

From personal experiences reported to me by avid fishermen, both relatives and friends, the size of the fish caught in Square Lake is decreasing and more of the salmon stocked in Cross Lake are being caught in Square Lake. The impaired water quality of Cross Lake forces the cold water fish (salmon and trout) to migrate to Square Lake in order to survive and reproduce. For the past four or five years, some people who previously ice fished on Cross Lake no longer do so because they cannot catch trout or salmon (only perch), again due to the poor water quality in Cross Lake. In fact, my brother-in-law, who is one of the most avid fishermen I know, recently sold all of his ice fishing equipment for that very reason. Practically the only time that anyone fishes on Cross Lake in the summer is in the early spring before the water conditions deteriorate such that the cold water fish head to Square Lake to survive. Increased angling pressure on Square Lake has already occurred due to the scarcity of cold water fish in Cross Lake, as well as plowing of the road to Burnt Landing on Square Lake in the winter in recent years. Additional development on both Cross Lake and Square Lake, as well as providing a public trailered ramp on Square Lake, will only increase this pressure on Square Lake. As the MDIFW recommended, increased habitat protection in the tributaries of the affected lakes would help to conserve the native brook trout and concerted efforts to improve the water quality in Cross Lake in order to restore the fishery there, would help to alleviate some of the angling pressure on Square Lake.

- 2. Water Quality.** Regarding our concerns about water quality, which also directly relates to the lakes’ fisheries, I provide testimony as an environmental engineer, principal of an environmental consulting firm, and former owner of a drinking water testing company, as well as a year-round resident of Cross Lake. Our water quality concerns are primarily for Cross Lake, which currently does not meet water quality standards due to culturally induced algal blooms from excess phosphorus loading, and which has impacted its fishery and impaired “the use and enjoyment” of the lake, in direct violation of the Maine water quality standards for class GPA lakes. We personally have seen algae blooms on our shoreline and in the water near shore in the late summer and, as we have also seen, Cross Lake camp owners have reported a significant increase in the amount of weeds (also caused by excess nutrient loading) in the lake in the past four to five years, especially last year.

To stress the importance of water quality, I’d like to again quote from the CLUP **Section 5.11 Water Resources:**

“Water is abundant in the jurisdiction with 2,635 lakes larger than one acre, over 21,000 river and stream miles, and billions of gallons of groundwater. But purity, rather than abundance, sets these waters apart from other regions of the United States. Most of these waters provide stable, high-quality aquatic habitat for many species that require such conditions, such as freshwater mussels, damselflies and brook trout.”

“These outstanding water resources are integral to the principal values of the jurisdiction. Taken as a whole, they represent an unusually high-quality natural resource with significant ecological value.”

“The dwindling supply of high-quality water resources elsewhere makes the jurisdiction’s resource increasingly rare and valuable.”

We realize that the principal source of phosphorus loading to Cross Lake is agriculture in the Dickey and Daigle Brook watershed areas, and appreciate the amendments to the Concept Plan regarding controlling and tracking phosphorus exports to Cross Lake from the development areas. However, to make sure that the proposed development in the Cross Lake watershed indeed protects the water quality, we request that the Commission consider adding the following to the Concept Plan.

- i. Annual Monitoring.** Monitoring data obtained from the Maine Volunteer Lake Monitoring Program (VLMP) for Cross Lake shows a seven year data gap from 2009 to 2016. We realize this is a volunteer program and in fact my husband and I have volunteered to collect this data in the future, but there could again be gaps due to a lack of volunteers. To ensure continuous monitoring, it would be of greater benefit to require annual monitoring of Cross Lake (as well as perhaps the other connected lakes in the plan area) as a provision in the Concept Plan, whether completed by volunteers or by the DEP, and funded by the petitioner as necessary.
- ii. Annual Inspections.** Due to potential violations of the Concept Plan “Phosphorus Control Plan” for Cross Lake by developers, business owners, and/or homeowners, we propose that the Petitioner or developer, commercial business and/or subsequent subdivision homeowner’s association (HOA), be required to hire an independent qualified third-party inspector to perform an on-site survey of all lots and common areas and prepare a report submitted to LUPC and DEP regarding compliance or noncompliance with all standards regarding water quality, phosphorus control (including mitigation projects and phosphorus control measures, if implemented), erosion and sedimentation control, vegetation clearing, and road construction, including but not limited to the following standards from the Concept Plan or Chapter 10, if not amended in the Concept Plan: Surface Water Quality (Chapter 10, Section 10.25(K)), Phosphorus Control (Concept Plan Subchapter III, 10.25(L)), Erosion and Sedimentation Control (Concept Plan Subchapter III, 10.25(M)), Vegetation Clearing (Concept Plan 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)).
- iii. Records.** The April 12th Concept Plan Amendments regarding phosphorus contained this statement, “Petitioner shall maintain accurate records demonstrating compliance with this program for the life of the Concept Plan.” We’d request that the Commission consider requiring these records include the above inspection reports, proposed mitigation projects and phosphorus control measures, and that *all* records be submitted to both LUPC and DEP, plus made available to the public.
- iv. Mitigation Credits.** We understand that Cross Lake does not meet the State water quality standards and already receives more phosphorus loading than its natural capacity to assimilate phosphorous by several thousand pounds per year. Our reading of 10.35(D) in Section 19 of the Concept Plan Amendments is that the ‘Total Phosphorus Budget’ for the development areas in the Cross Lake watershed may be increased on a 1:1 basis by any mitigation project anywhere in the Cross Lake watershed (whether conducted by the Petitioners or other parties) which reduces the phosphorus export to Cross Lake. We are concerned that this approach would not benefit the lake because the net effect will not directly reduce the existing excess phosphorous loading to the lake and ask the Commission to not allow an increase in the development areas’ “Total Phosphorus Budget” on a 1:1 basis by any mitigation project anywhere in the Cross Lake watershed.

However, several Cross Lake members of the FRLLA would gladly volunteer to help initiate, install and/or monitor any mitigation project not related to the development areas in the Cross Lake watershed to reduce phosphorus loading to the lake in cooperation with the Petitioner or a developer, which could potentially be funded in whole or part by a percentage of the parcel or lot sales.

b) Impacts of Shoreland Lots (Steep Slopes & Existing Camp Lots)

1. **Steep Slopes.** Proposed residential developments in several locations in the plan area, including some shoreland development, are on hillsides with steep slopes. Also, cluster developments should be required for proposed shoreland lots on Cross Lake, since it is a Management Class 5 Lake (Heavily Developed). Some proposed changes to cluster development dimensional requirements were deleted in the plan amendments, but **Cluster Development**, Subchapter III 10.25(R)(2)(a)(1)(b) and (2)(c), still propose slopes greater than 25% as “unbuildable land” instead of the current standard of 20% slopes.

To help prevent shoreland lot development on steep slopes that could impact Cross Lake, we would ask the Commission to consider keeping the current standard of 20% slopes as unbuildable land for cluster developments, as it is for other subdivisions. (See **Subdivisions**, Subchapter III 10.25(Q)(3)(d)(3), which states, “Where practicable, building envelopes shall be arranged so as to avoid the placement of structures and driveways along ridge lines, on agricultural land, wetlands, slopes greater than 20 percent, or any other important topographic and natural features.”)

Moreover, 15% slopes as unbuildable land is suggested in two different sections of the Concept Plan itself, as follows: (1) The *ARC Soil Suitability Evaluation Update* in Exhibit D of the 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. **Existing Camp Lots.** The CLUP under **Section 4.9.D Impacts of Existing Development** states, “The Commission will seek to establish incentives for bringing nonconforming lots and structures into compliance or closer compliance with current regulations. In these efforts, the Commission is particularly interested in innovative voluntary approaches.” The existing camp lots are mostly nonconforming lots and there are provisions in the Concept Plan to help make them either conforming or less nonconforming by adding back lots wherever possible, principally to provide additional land for replacement septic systems, which will help to improve water quality over time.

The Petitioner has voluntarily stated in Volume 1, Question 10 of the plan that, “The current lease or license holders would be given the first option to purchase the lots at the determined valuation.” When sold, if an existing lot is not purchased by the current license holder, but offered for sale to someone else, this nonconforming lot will likely continue as is or the existing camp could even be expanded. However, related to the expansion of existing camp lots by requiring back lot purchases in the sales, if the Petitioner also gave the abutting license holders second option to purchase any abutting licensed lots not purchased by the current license holder, this could also serve to make the existing shorefront lots conforming or less nonconforming with the applicable Commission requirements.

CONCLUSIONS

1. **Cross Lake E & Square Lake Remoteness & Relative Absence of Development (a Principal Value).** Considering the extent and location of the development proposed in Cross Lake E and in Square Lake, the Commission should carefully consider the relative *remoteness* and *natural character* of these areas.
2. **Fisheries & Water Quality.** We share the concerns raised by MDIFW regarding the lakes' fisheries, especially the protection of brook trout habitat and increased angling pressure due to the amount of proposed development. Considering that Cross Lake already has impaired water quality, the Commission should consider requiring annual water quality monitoring and compliance inspections of any development, and require those reports be submitted to LUPC and DEP (and made available to the public), as well as not allowing an increase in the development areas' "Total Phosphorus Budget" on a 1:1 basis by any mitigation project in the Cross Lake watershed.
3. **Impacts of Shoreland Lots (Steep Slopes & Existing Camp Lots).** The Commission should consider reducing the impact of new shoreland lots by keeping the current standard of 20% slopes as unbuildable land in "clustered developments." Likewise, we ask that the Petitioner consider allowing abutting camp owners second option on any adjoining lots not purchased by the current license holder at the time of sale, to help make the existing shorefront lots conforming or less nonconforming with the applicable Commission requirements.

OATH

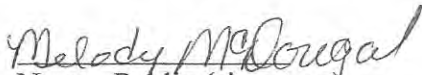
State of Maine
County of Aroostook

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)

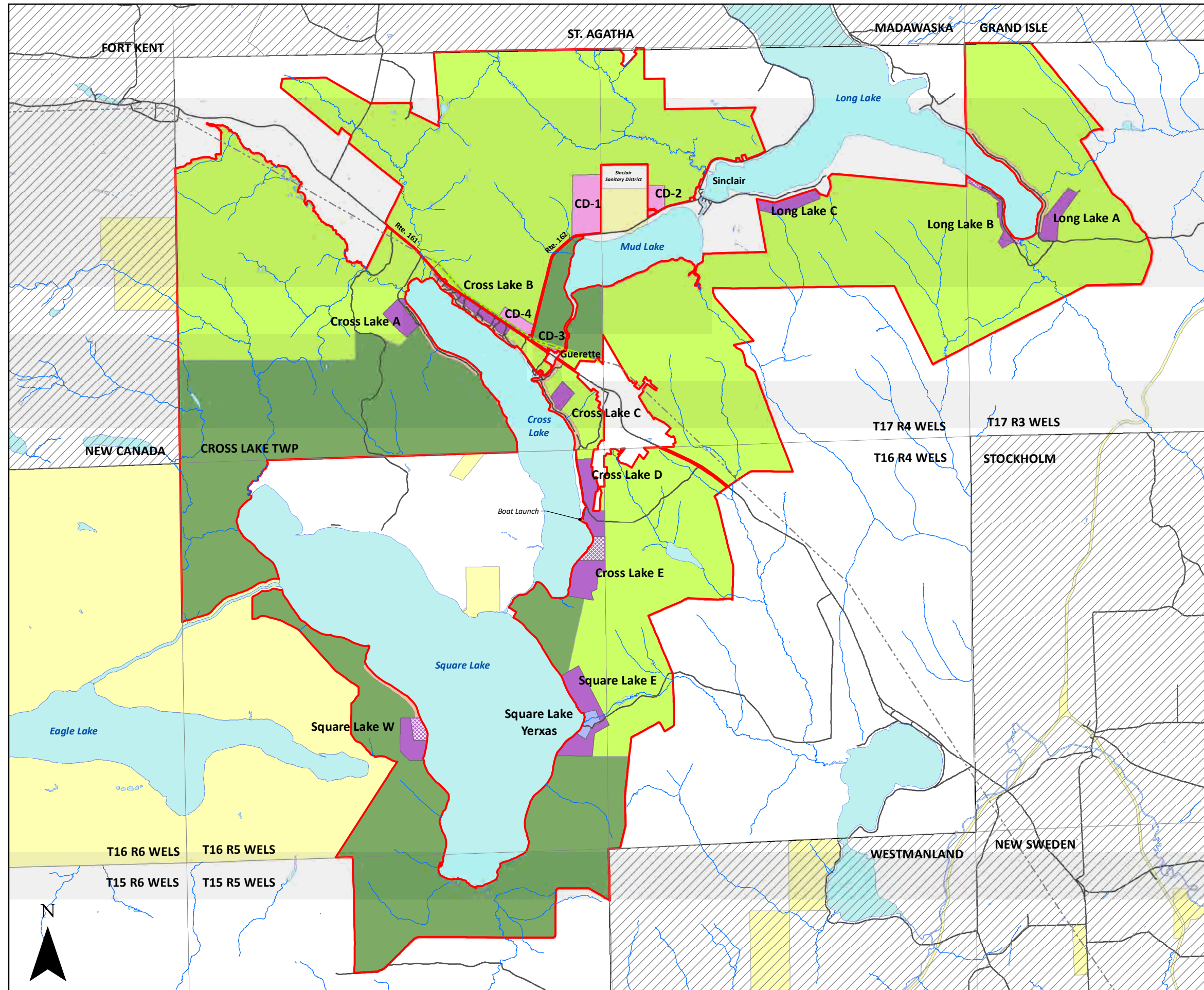


EXHIBITS

(10 Maps & Photos)

CONCEPT PLAN SUMMARY

Fish River Chain of Lakes Concept Plan

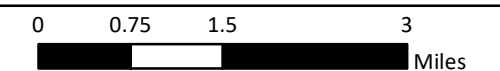


Legend

- Major Roads
- - - Transmission Line
- Streams
- ▨ Organized Towns
- Water Bodies
- Proposed Recreational Lodging Area
- Proposed Comm/Econ Development Areas
- Proposed Residential Development Areas
- Proposed Open Space
- Existing/Expanded D-FRL-RS
- Maine Public Reserve Land
- Conservation Easement Area
- ▭ Concept Plan Area

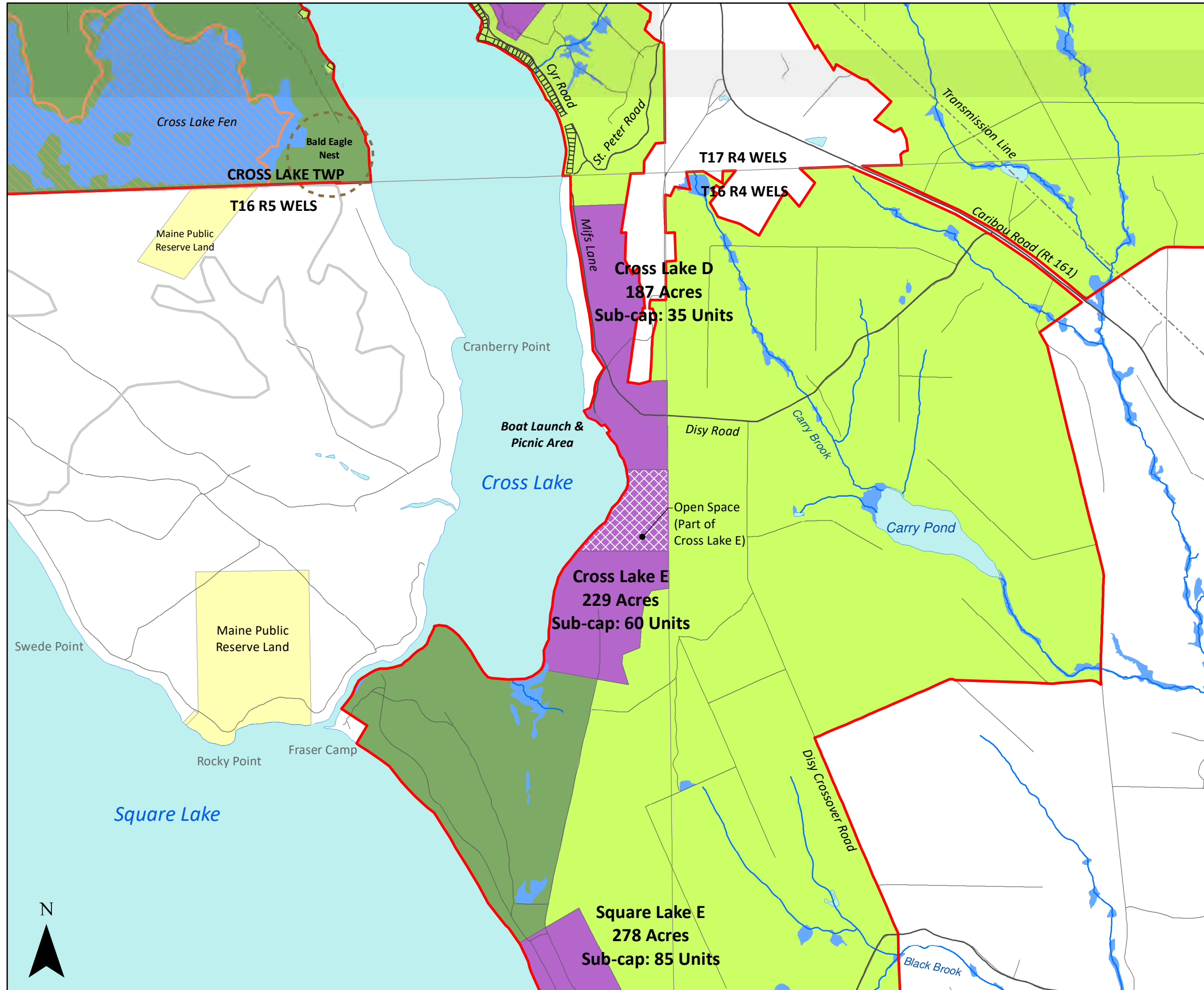
Note

1. The Concept Plan includes other elements (such as water access sites, outpost facilities and public elements) that are described in the Petition. See Map 33 Remote Campsites and Remote Rental Cabins and Map 34 Publicly Accessible Water Access Sites for the location of these elements.



April 2018

MAP 21



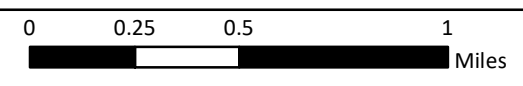
DEVELOPMENT AREAS

Detail Area D

Fish River Chain of Lakes Concept Plan

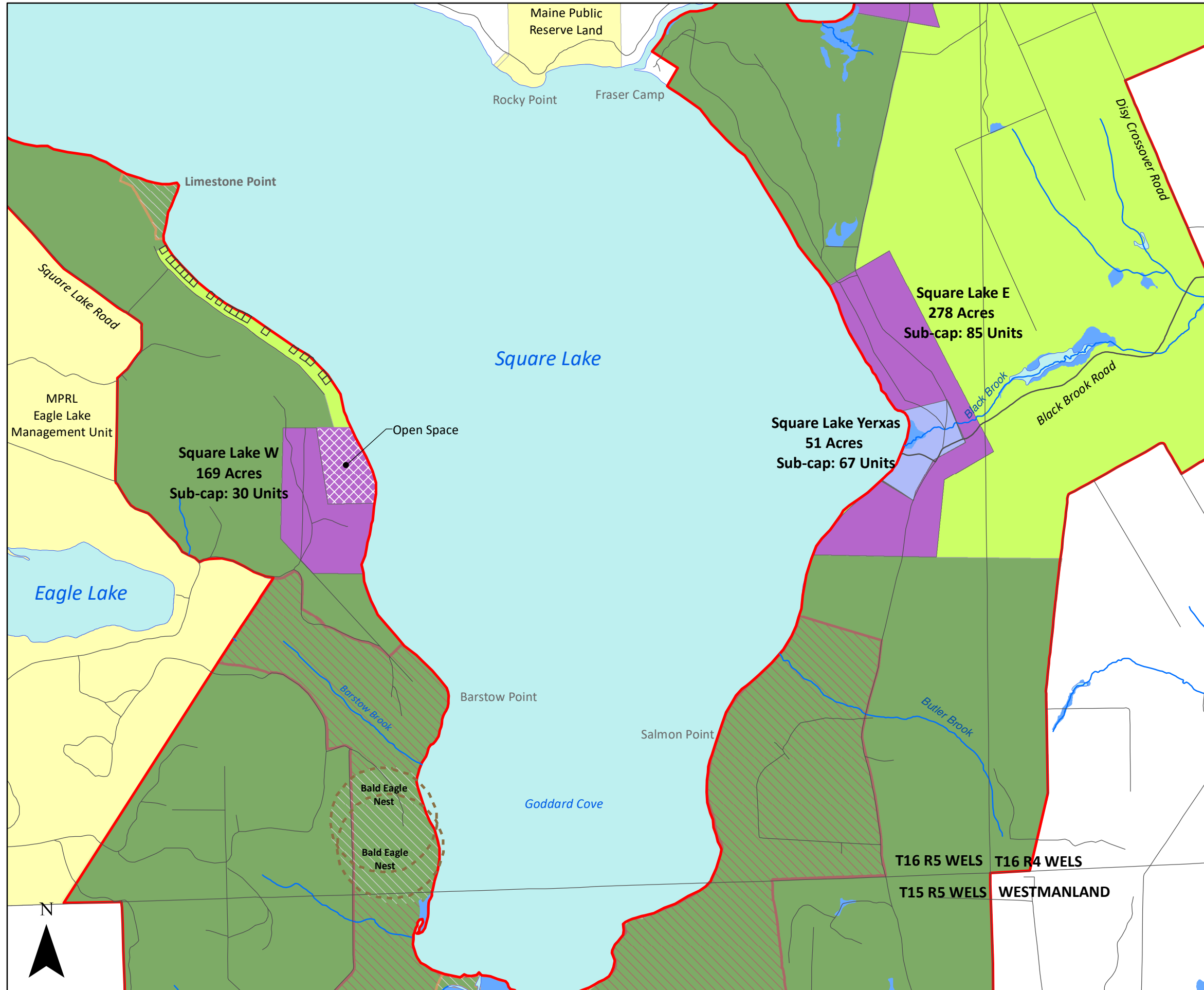
- Legend**
- Major Roads
 - Secondary Roads
 - - - Transmission Line
 - Streams
 - Wetlands
 - Existing Camp Lots
 - ▨ Irving Unique Areas
 - Nesting Site
 - Proposed Residential Development Areas
 - ▨ Proposed Open Space
 - Maine Public Reserve Land
 - Conservation Easement Area
 - Concept Plan Area

- 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



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
IRVING WOODLANDS, LLC

0 0.25 0.5 1 Miles

April 2018 **MAP 26**



09/29/2009



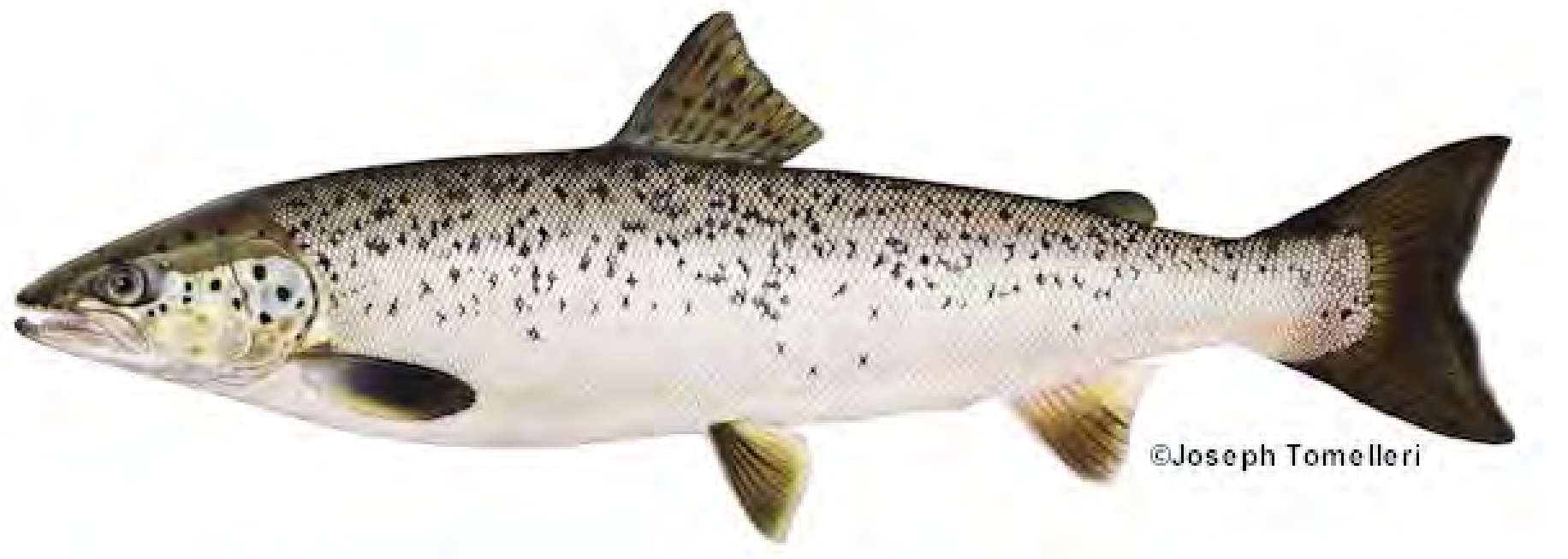
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Cross Lake is a Non Point Source Priority Watershed

*Waterbodies within designated **NPS priority watersheds** have significant value from a regional or statewide perspective and have water quality that is either impaired or threatened due to NPS water pollution. This list identifies watersheds where state and federal agency resources for NPS water pollution prevention or restoration should be targeted.*

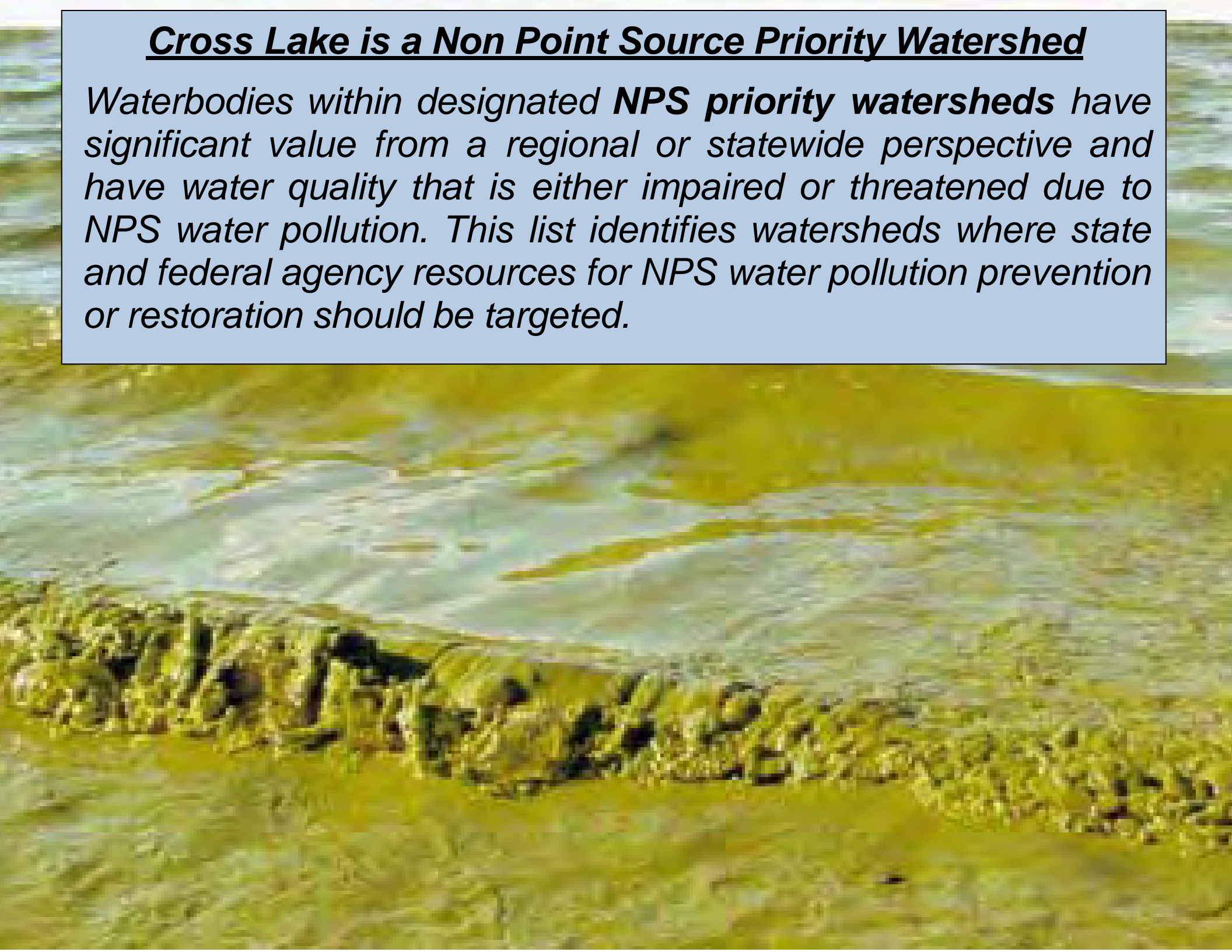


Figure 1. Map of Cross Lake Direct and Indirect Watersheds

