

STATE OF MAINE
DEPARTMENT OF CONSERVATION
LAND USE REGULATION COMMISSION

IN THE MATTER OF

PLUM CREEK MAINE TIMBERLANDS, LLC)	
MOOSEHEAD LAKE CONCEPT PLAN)	
)	PRE-FILED TESTIMONY
PISCATAQUIS AND SOMERSET)	APPALACHIAN MOUNTAIN CLUB
COUNTIES, MAINE)	WALTER GRAFF
)	
ZONING PETITION ZP 707)	

My name is Walter Graff, and I am the Deputy Director of the Appalachian Mountain Club. The AMC, headquartered at 5 Joy St., Boston, MA 02108, with offices in Brunswick and Greenville, ME, is a private, non-profit organization whose mission is to “promote the protection, enjoyment, and wise use of the mountains, rivers, and trails of the Appalachian region.” We encourage public respect for the natural environment, provide leadership in its protection, and provide recreational and educational programs and facilities for the enjoyment and wise stewardship of the outdoors. Our nearly 90,000 members reside largely in the Northeast and include about 3,800 members in our Maine chapter, as well as many others who visit the state on a regular basis to participate in outdoor recreational activities. The AMC therefore has an active interest in the protection of Maine's significant natural resources such as those found in the Moosehead Lake region, with a special interest in the unique recreational resources encompassed by the Plum Creek project lands.

Statement of Purpose

AMC believes that a planned approach to both development and conservation is the most effective means to ensure that the Moosehead Lake region retains its unique character for

generations to come. We commend Plum Creek for choosing to propose a Concept Plan, and laud various elements within it, especially the landscape-scale conservation provided by the Conservation Framework. In our expert testimony, AMC will offer concrete suggestions for improving the Plan so that it will better conform to LURC's Comprehensive Land Use Plan (CLUP), as well as the statutory criteria for LURC's review of rezoning petitions. In this third iteration of its Concept Plan, Plum Creek has made changes that make this Plan a significant improvement over that proposed two and a half years ago. But AMC believes further improvement is still needed in order for the proposal to meet LURC's criteria for concept plan approval.

AMC's comments on the Concept Plan will focus on those areas in which our history and staff expertise are most applicable, conservation and recreation. We will use expert witnesses from AMC staff to address the specifics of the Plan that impact the recreation and conservation values with which we are most familiar.

Background

Founded in 1876, the AMC has a long history in the Northeast and in Maine as a leader in the protection of the region's natural and recreational resources. At the turn of the last century, AMC members led the effort to protect what became the White Mountain National Forest with the passage of the Weeks Act in 1911. Comprised of avid hikers, map makers, and geologists, AMC described the Katahdin wilderness in 1881 in its *Appalachia* journal, the oldest, continuously published journal of mountaineering and conservation in America. AMC members created the first maps of Mount Katahdin in 1927, and our *AMC Maine Mountain Guide*, first published in 1961, has recently been updated and published in its 9th edition. In the White Mountains of New Hampshire, AMC is probably best known for our system of eight high elevation huts, each a days hike apart along the famed Appalachian Trail. We also provide

accommodations and environmental education programming in our front country lodges, backcountry shelters, and numerous camps and cabins for a total of 50 facilities from Maine to Fire Island, NY. Through its facilities ranging from roadside lodges and environmental education centers to backcountry shelters and campsites, the AMC comes in contact with over 500,000 visitors each year, and accommodates approximately 150,000 overnight guests annually.

In 2003, AMC purchased the 37,000-acre Katahdin Iron Works (KIW) tract, which is surrounded on three sides by Plum Creek lands that are included in the proposed concept plan. As part of our Maine Woods Initiative, our goal for the KIW tract is to support sustainable economic development in the region by providing new backcountry recreation opportunities, practicing sustainable forestry, and offering environmental education programming to school children and visitors. We currently own three sporting camps, two on the KIW tract and one within the Roach Pond Tract, and have created a Recreation Plan for our KIW property that includes more than 100 miles of hiking and ski trails, primitive campsites and shelters, as well as remote self-service cabins and two additional sporting camps. We also have created a 10,000-acre ecological reserve in the northern sector of our property (which abuts land in the proposed project area). AMC's vision for the region beyond our current property boundaries includes a protected backcountry recreational corridor from Moosehead Lake to Baxter State Park. Thus our interest in Plum Creek's proposed Concept Plan is high, given the impact the outcome may have on our own plans and operations, on the region's fundamental remote character, and on the unique recreational experience this remoteness provides.

While it is only relatively recently that AMC became a land owner in the Moosehead Lake region, we been actively involved in various efforts to enhance protection of the area's unique values for many years. As a founding member of the Northern Forest Alliance, AMC's

research department created the maps for the 1997 NFA publication, *Wildlands: A Conservation Strategy for the Northern Forest*. The strategy identified the Greater Baxter State Park Area, from Churchill Lake in the north to the Katahdin Iron Works in the south, as an unparalleled combination of high-value lakes, rivers and mountains, making it one of the most ecologically important areas in the state, as well as critical recreational resource. It also noted that the area had the highest concentration of land without permanently maintained roads in the entire state. AMC also strongly supported the creation of the Friends of Moosehead and their efforts to protect the region's many values. In addition, AMC has engaged in various regulatory processes, including Federal Energy Regulatory Commission (FERC) hydropower relicensing settlements and wind power siting proposals that have directly impacted water and mountain resources in the Moosehead Lake area. We became a landowner in the region to further a vision that will sustain its natural resource-based economy through increased nature-based tourism and remote, backcountry recreation, sustainable timber harvesting, protection of ecologically significant lands and waters, and provision of environmental education opportunities to local school children, residents and visitors. We believe there is a demonstrated need in the community for sustainable economic development, and we are committed to our Maine Woods Initiative for the long term.

Since Plum Creek first announced its intentions to propose a Concept Plan for its lands surrounding Moosehead Lake, AMC has focused its attention on how the Plan may impact the current and potential sustainability of a multi-faceted natural resource-based economy in the region, especially the backcountry recreation resources and remote character for which the region is known. Prior to the public scoping sessions held in August, 2005, we developed eight

principles which then as now have been the lens through which we have reviewed the Plan.

These eight principles are:

- 1. Conservation must be permanent and must be on a scale commensurate with the size of the region and the size of proposed development.**
- 2. The remote and undeveloped character of the region must be maintained as the region's primary asset. The Maine Woods is the last large-scale wild place in the East.**
- 3. The public must be able to access and enjoy the natural, scenic, and recreational assets of the region. Development must not lead to "privatization" of these resources.**
- 4. Long-term planning and predictability are critical to ensuring the on-going economic vitality of local communities. Any development must reflect the values of local communities, and its primary economic benefits must accrue locally.**
- 5. Development should be contiguous to existing development, maximizing the economic benefits and minimizing the infrastructure costs to local communities.**
- 6. Protection of remaining recreation corridors that provide high-quality multi-day waterway and forest backcountry trips, an extremely limited resource today, is paramount.**
- 7. To fulfill the objectives of Maine's "Comprehensive Wildlife Conservation Strategy," protect the ecologically most important areas.**
- 8. Provide an appropriate balance between the economic benefits to landowners seeking to develop, and economic benefits to the people of Maine.**

Conservation Framework

AMC is a partner in the Conservation Framework. We recognize that the Framework is not part of the "balance" conservation required to offset the development components of the Plan as required by LURC. However, we do believe that if LURC determines approval of a final Plan is appropriate, the almost immediate implementation of the Conservation Framework which would follow will go far to ensure the permanent protection of the region's resources at a landscape scale, will further the other principles we established in 2005, and will complete a protected backcountry recreational corridor between Moosehead and Baxter State Park.

As noted previously, AMC currently owns Medawisla Wilderness Camps on Second Roach Pond in Shawtown Township. This past winter, AMC led camp-to-camp ski trips from Medawisla to West Branch Pond Camps, and then on to Little Lyford Pond Camps, located on

our KIW lands. AMC has partnered with West Branch Pond Camps, a family-owned camp now operated by the 4th generation, to create this unique camp-to-camp skiing opportunity. Our interest in purchasing the Roach Ponds tract as part of the Conservation Framework is not only to protect this kind of connectivity and recreational opportunity between our camps and local partners like West Branch Camps, but also because permanent protection of the Roach Pond tract from development is a keystone piece to complete a protected corridor encompassing the 100 Mile Wilderness region and the Appalachian Trail, connecting Moosehead Lake to Baxter State Park through a continuum of protected lands in both public and private ownership.

In addition, as a partner in the Framework, we are committed to helping to raise the funds for the purchase of the Moosehead Legacy Easement by The Nature Conservancy. The Moosehead Legacy easement represents one of the largest land conservation projects in Maine history and would help create the second largest conservation easement in the United States. It is a critical element in maintaining the remote character of the region in perpetuity. The Conservation Framework will maintain working forests, public access, and traditional recreation opportunities, in addition to permanently protecting high value conservation areas. For these reasons AMC believes that the Conservation Framework will benefit the region, and the state as a whole.

Conclusion

Thank you for the opportunity to testify in this proceeding. As noted earlier, our expert witnesses will provide a detailed critique of the impacts of certain elements of the Concept Plan on significant conservation and recreation resources in the region. They also will offer concrete suggestions for changes to the Plan that would ensure protection of these resources, thereby

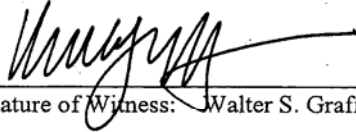
improving the Concept Plan's conformity with LURC's statutory rezoning review criteria and the CLUP.

Specifically, our first expert is Deputy Director of Conservation Heather Clish, who will address the recreational values protected by or adversely impacted by provisions of the Concept Plan. AMC has fundamental interests, concerns, and expertise in recreation, especially backcountry, primitive pursuits such as hiking, camping, paddling, nordic skiing, and snowshoeing. Ms. Clish's testimony will include recommendations that will enhance the Plan's alignment with the recreational resource goals identified in the CLUP.

Our second expert witness is Dr. Kenneth Kimball, Director of Research. Dr. Kimball will address confusion in the plan about landownership relative to certain shorefront lands on Indian Pond and Brassua Lake that have been proposed for rezoning, in light of existing and ongoing Federal Energy Regulatory Commission (FERC) relicensing commitments and processes.

Finally, Dr. David Publicover, Senior Staff Scientist, will present comments on the Plan and its regional context, and discuss proposed land use zones and uses as they relate to broad conservation and recreation values. He also will offer concrete suggestions for changes to certain zones and uses within those zones and conservation easement provisions to resolve some of the issues identified in his, Dr. Kimball's, and Ms. Clish's testimony.

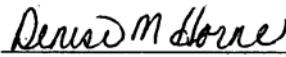
VERIFICATION



Signature of Witness: Walter S. Graff

August 27, 2007

Before me appeared Water S. Graff, who, being duly sworn, did testify that the foregoing testimony was true and correct to the best of his knowledge and belief.



NOTARY PUBLIC

**Denise M. Horne, Notary Public
My Commission Expires
April 4, 2012**