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**WRITTEN TESTIMONY RECEIVED DURING THE PUBLIC HEARING FOR  
PROPOSED RULEMAKING TO REPEAL AND REPLACE THE COMMISSION’S  
CHAPTER 13 RULES, “*METALLIC MINERAL EXPLORATION, ADVANCED  
EXPLORATION AND MINING*” AND TO AMEND RELATED SECTIONS OF THE  
COMMISSION’S CHAPTER 10 RULES**

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**Maine Land Use Planning Commission  
Maine Department of Agriculture, Conservation, and Forestry**

**Public Hearing Date: April 11, 2018**

**Public Comment Deadline: April 23, 2018**

**Rebuttal Comment Deadline: April 30, 2018**

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April 11, 2018

**Comments before the Land Use Planning Commission on mining and development in the unorganized territories of Maine.**

Hello Commissioners,

My name is Shelly Mountain and I live in Mapleton. I am originally from Portage and own a camp there. My family history in Portage goes back several generations. I have been fishing and camping in the unorganized territories of Northern Maine all of my life. The resources of the unorganized territories of Northern Maine have provided my husband with an income his entire working life. It still does and now provides income for my 2 sons as well.

The economy of Aroostook County is heavily dependent on the continued health of the ecosystems of the unorganized territories of Northern Maine. The sustainable industries of logging, agriculture, tourism, snowmobiling, hunting, and fishing provide most of the jobs in Aroostook. Opening the unorganized territories to the certain water contamination from metallic mineral mining would devastate those industries. There has never been any mining, anywhere in the world, that has not caused contamination. The law that was passed in the legislature last year does not protect the people of Maine from mining contamination. It does not even prohibit water contamination.

Wolfden Resources, a Canadian mine speculator, is already drilling on Pickett Mountain without the requirement of a permit. I attended Wolfden's public forum in Staceyville last year when Donald Hoy claimed that the mining operation "would have no effect on the environment." I asked Mr. Hoy for an example of a mine like that. He told me the Goldex mine in Quebec. In fact, Goldex was closed in 2011 because the mine flooded. The mining company was aware rock instability posed risks but continued to mine it until it flooded. In mining, profit always takes precedence over safety, whether environmental or human. That is part of the long, dark history of mining. It is true because there is no way to have both profit and safety. If a mining company operates profitably it cannot operate safely.

The certain water contamination will render my property on Portage Lake worthless. It will do the same to the areas that you are considering for development. I wonder if that is why these things are occurring at the same time. Surely landowners understand that developing and selling off lands just before they are ruined by mining contamination is the best business decision, the best way to suck as much profit as possible out of the land and waters. Develop it, sell it, mine it, ruin it, and walk away.

Please do not allow the ruin of the Northern Maine I love. Allow it to remain healthy for my children and all future generations. Don't prioritize the short-term profits of a few wealthy landowners over the industries that provide long-term, sustainable employment.

Thank you.

Alice Bolstridge, Ph. D.

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April 11, 2018

Chairman Worcester, Members of the Land Use Planning Commission

Thank you for this opportunity to testify. My name is Alice Bolstridge from Presque Isle Maine. I am here to beg you to please protect Bald Mountain and the Fish River water system near where I grew up in Portage Lake, Maine.

LD 820, the 2017 bill supported by the environmental community bans open-pit mining and wet-waste management. But it will allow contamination of ground water in restricted areas of underground or "shaft" mining, and it will allow an unspecified number of shafts or open pits of up to 3 acres. Such allowances could result in large mining areas which are all allowed to contaminate ground water.

I asked for an example of such a mine successfully containing pollution from surrounding waters. I was told the Green Creeks Mine in Alaska is such a mine. Researching, I find great causes for alarm and no evidence that underground mines with dry waste management can adequately protect the environment or human health. In one article, Shoren Brown writes, "the Alaska Department of Environmental Conservation released a study showing the Greens Creek mine is polluting Admiralty Island National Monument with acid mine drainage." "Greens Creek has a long history of polluting Alaska's waters. According to the Environmental Protection Agency, Greens Creek is Alaska's second biggest toxic polluter. It released 59 million pounds of toxic chemicals in 2000." [http://juneauempire.com/stories/050803/opi\\_myturn1.shtml#.WQMDV9LyuUk](http://juneauempire.com/stories/050803/opi_myturn1.shtml#.WQMDV9LyuUk)

Another article by Haines Watch says, "Greens Creek Mine has had hundreds of mining violations. Now, terribly, we know that the mine has greatly polluted Hawk Inlet. Local native communities are distraught over the possibility of a complete loss of subsistence in their ocean area. . . . These mines destroy and ruin a way of life that has gone on for thousands of years. Nothing is more "Restrictive" then destroying people's food sources. Tourism, Commercial Fishing, Sub-fishing, and our native communities are all at risk." <https://haineswatch.wordpress.com/2016/04/08/greens-creek-mine-a-terrible-polluter/>

With any metal mining in Maine's wet climate, local Maine resources of outdoor sports, fishing, and hunting as well as human health are at great risk. An article from the National Institutes of Health says, "Because of their high degree of toxicity, arsenic, cadmium, chromium, lead, and mercury [all elements found at toxic levels at Bald Mountain] rank among the priority metals that are of public health significance. These metallic elements are considered systemic toxicants that are known to induce multiple organ damage, even at lower levels of exposure. They are also classified as human carcinogens (known or probable) according to the U.S. Environmental Protection Agency, and the International Agency for Research on Cancer." <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4144270/>

Since 2012, I have repeatedly asked for evidence that any metal mining in Maine's wet climate can be environmentally safe. No one—not the geologists I have asked, not the legislators, not the environmentalist supporters of LD 820—have been able or willing to provide such evidence.

I have come to believe that nothing short of a ban on any metal mining in Maine will adequately protect against contamination of our water systems. Please, do everything you can to protect the environment, health, and outdoor economy of Maine against known destructive effects of metal mining.

**Testimony Before the Maine Land Use Planning Commission Metallic Mineral Exploration,  
Advanced Exploration and Mining  
Bangor, April 11, 2018**

Members of the Commission, Good afternoon.

My name is Gail Maynard I am a retired educator and beef producer from Perham. I come from a family of farmers, hunters and fishermen, and I am a member of the Association for the Protection of Aroostook Waters (APAW). I am here today to share my concerns regarding the rulemaking process for Metallic Mineral Exploration in Maine. I have researched mining issues in Maine for the last six years and have previously testified before state boards. As farmers, my family understands the importance of healthy soils and clean water, and we have long enjoyed wonderful recreational opportunities – some of the best wild brook trout fishing in the world – right in our Aroostook County back yard.

The area around Pickett Mountain, which includes Shin Pond and numerous lakes and streams, is now a target of advanced mining exploration by a Canadian company, Wolfden Corporation. This region supports a sustainable economy based on recreation, wild life management, forest products, tourism and agriculture. Rich in natural resources, the area is a major vacationland destination, a Mecca for sportsmen. Do you want to trade this pristine treasure for a short-term gain on a foreign company's bottom line?

Mining is one of the dirtiest industries in the world, and the environmental track record of mining companies is dismal. I fear that weak mining rules will lead to poisoned water, degraded wild life habitat, years of costly clean up on the taxpayers' dime. In addition, weak mining rules could create a "boom and bust" economy, followed by a blighted landscape ill suited to economic renewal

Wolfden Corp, the current applicant for mining permits, by their own admission, is not a mining company. They are in our midst as explorers, speculators, meaning they will likely market their findings to a "real mining" concern. Where are the guarantees that any subsequent mining entity will honor any compliance assurances by Wolfden? I am concerned that any mining company would be unable to provide adequate disaster mitigation funds. Future cost could be prohibitive. A quick review of the research casts doubt on Wolfden's claims of economic viability. Available market analyses suggest that their economic prognosis is not good.

The current regulations allow for limited groundwater pollution, however, I am persuaded that there can be no fail safe way to protect our water. I believe that any contamination of ground or surface water is completely unacceptable. Folks will long remember those who sacrificed their precious natural resources for a fool's gold promise of short-term jobs. There is no promised job, or amount of tax revenue that is worth the destruction of our healthy soil and clean water.

Any rule making must include comprehensive monitoring by state environmental officials backed up by ironclad protections. This stewardship now rests with your commission. If you don't get this right, there will be no second chance. Maine's future generations are depending on your integrity and wisdom.

Thank you for your time and consideration.

Gail C. Maynard  
Blackstone Ridge Farm  
Perham, Maine



**Testimony Neither for Nor Against proposed rulemaking to repeal and replace Ch.13 Rules, Metallic Mineral Exploration, Advanced Exploration and Mining, and to amend Ch. 10 Rules, Land Use Districts and Standards**

**By Nick Bennett, Staff Scientist**

**April 11, 2018**

Good afternoon Chairman Worcester and members of the Maine Land Use Planning Commission (LUPC):

My name is Nick Bennett, and I am the Staff Scientist for the Natural Resources Council of Maine (NRCM). I reside in Hallowell. I am offering testimony neither for nor against the proposed rules before you today, but I am seeking clarification. These rules relate to exploration and advanced exploration in the unorganized territories (UT), but NRCM believes they should have a clearer definition of what constitutes exploration and what constitutes advanced exploration.

In addition, NRCM is uncertain how the definitions in these proposed rules conform to the corresponding sections of the Department of Environmental Protection’s (DEP) Chapter 200 rules for mining that Maine adopted last year. This seems particularly important because any advanced exploration activity, whether in the UT or in the organized territories, must receive a permit from DEP. Therefore, NRCM believes that LUPC should clearly state in its rules what sort of Level B mining activity would constitute advanced exploration (and whether it would be Tier 1 or Tier 2 advanced exploration) and therefore require a permit from DEP.

I have cut and pasted the sections from the proposed rules that NRCM believes are unclear below:

**13.01 (E). Relation to Chapter 10.**

The Commission’s Chapter 10 rules, *Land Use Districts and Standards*, establishes in which subdistricts exploration activities and mining activities, including advanced exploration, are an allowed use. Chapter 10 categorizes all exploration and advanced exploration activities as falling into one of the following two use listings: Level A Mineral Exploration and Level B Mineral Exploration. The Chapter 10 use listing “Level A Mineral Exploration” solely consists of activities defined as exploration in this Chapter. The Chapter 10 use listing “Level B Mineral Exploration” consists of exploration activities, as well as some advanced exploration activities, as defined in this Chapter. All Level A Mineral Exploration, as well as Level B Mineral Exploration that qualifies as exploration under this Chapter, is subject to Section 13.02. Level B Mineral Exploration that qualifies as advanced exploration under this Chapter, is subject to Section 13.03.

The confusing language in the section above states that Level B Mineral Exploration could be either advanced exploration or just exploration (exploration does not require a DEP permit). However, nothing in the definition of Level B Mineral Exploration Activities (see 10.02(101) below) distinguishes what sort of Level B activities would be exploration and what would be advanced exploration, and therefore, what Level B activities would require a DEP permit and what would not. NRCM believes that the proposed rules need to be clear on these points.

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My husband and I moved to Maine almost 18 years ago to be near his side of our family. I am here as a member of APAW which is the Association for the Protection of Aroostook Waters. My husband and I are active members, and were active members of NRCM during the rulemaking process. We, in coordination with NRCM put on several informational forums about the dangers of Metallic Mineral Mining in our state. Our interests diverged at the point that the legislation was written to allow for groundwater contamination of our pristine waterways in the state of Maine. We are no longer members of NRCM and have become extremely leery of any Environmental Groups because of conflicts of interest that I will not go into here. Suffice it to say that we feel used and our blinders have been further removed on this subject.

We recreate and restore ourselves at Fish River Falls and in and around Carr Pond which is near the Bald Mountain deposit that has been explored for viability in the past. Most of the folks that live in the Northern part of our beautiful state do so because we enjoy nature and what it has to offer us. This is also why people come here for tourism, to enjoy the places that we have come to love and where we take our family and friends that come to visit, hoping to pass along our love of the area to our nieces and nephews and their children. This cannot happen if we don't protect what we have right now.

APAW, I am proud to say is a group of very determined individuals. Every single member brings their own unique strengths, talents and life experience to this cause and we are committed to raising awareness and holding your and any mining companies feet to the fire to protect our beloved Fish River Chain and other deposits in Maine such as Pickett Mountain which is being "explored" right now.

The short term economic gain of mining which generates very little employment because of mechanization, is not worth the risk to our currently healthy and permanent tourism industry that will be destroyed if we allow the contamination that is inevitable with metal mining. There are no examples of mining without environmental contamination. Our clean water is not for sale.

Thank you for your time,

Lorette Adams

350 West Ridge Rd.

Mars Hill, ME 04758

**Testimony before the Maine Land Use Planning Commission Metallic Mineral Exploration, Advanced Exploration and Mining.**

**Bangor, April 11, 2018**

Members of the commission, good morning.

My name is Michael Maynard and I, too, am from Perham and a member of APAW. Perham is a wonderful place, situated right between two of Maines magnificent wild jewels: Bald Mountain and the irreplaceable Fish River chain to the west and the Pickett Mountain region to the south which is home to historic places in Maine history and folklore. Places like Shin Pond, and Rockabema. The headwaters of the West Branch of the Mattawamkeag River are also here. Teddy Roosevelt, one of the great conservationists in our history fell in love with this river and spent time on it whenever he was here.

I'm sure if Roosevelt were standing here in front of you today he would **NOT** be advocating for a loophole in the zoning requirements found in LD 820. This paragraph in the law that allows for the LUPC to circumvent the intentions of the people of Maine who worked so hard to protect these areas should be stripped out. What possible benefit to the people of Maine can possibly come from allowing a foreign company to come in and start drilling holes in our heritage?

I think some people forget just how fragile these wild places are. Ecosystems are not commodities to be traded upon like corn, wheat, or pork bellies. When you allow a company to come in and dig up an ecosystem you tell the people who will be the most affected by the mine that it will be okay, that you'll make them 'fix it' before they leave. But they can't. You can't put scrambled eggs back in the shell and you can't restore a environmental disaster.

This region of Maine is home to what is inarguably the last stand of the wild brook trout in the country. The last safe haven. There are no new frontiers for them after these regions are gone. They're simply gone. These fish already have enough problems trying to navigate silted in spawning redds and unfiltered sunlight, they don't need the added burden of trying to live through toxic mining residue.

These regions were sanctuaries for people like Thoreau and Roosevelt. They are now sanctuaries for the people you see standing here before you. Percival Baxter recognized *immediately* that the value of this land lay not in handing it over to corporate interests, but in protecting it forever for the enjoyment of ALL Maine residents and not for the betterment of some foreign company's bottom line. Think about all the wild and beautiful places you have access to in Maine and then imagine how you'd feel if they were destroyed by industrialization; because they can be if you allow companies like Wolfden free reign to exist here.

Make the right decision, for the good of the people of Maine, for our children and our grandchildren. Much is riding on you.

Thank you,

Michael Maynard