

June 8, 2011

David W. Bridges, Chair  
Comprehensive Planning Committee  
Town of Freedom  
71 Pleasant Street  
Freedom, ME 04941

Dear Mr. Bridges,

Congratulations! We are happy to inform you that the State Planning Office finds the draft 2011 Freedom Comprehensive Plan to be **consistent** with Maine's Growth Management Act. Thanks to the hard work of your committee, its consultant and all others who were involved, this plan offers useful guidance to the Town's citizens and decision-makers for the years ahead. We hope it will be adopted at the local level.

We have one suggestion which we believe would strengthen the plan - that is to put the "objectives" and "recommendations" found in the Future Land Use section into the "action plan" format used in the other chapters. We see Future Land Use "objectives" and "recommendations" as analogous to the "policies" and "strategies", respectively, cited in the various action plans. It would be particularly helpful if a rough time frame and responsible party were identified for each of the recommendations.

As with the suggestions offered in the agency comments forwarded to you on 5/25/11, we encourage the Town to incorporate our suggestion into your plan. Please note that no further review will be required for plan changes that reflect the agency or SPO suggestions. Also, making such changes, or opting not to make them, will have no affect on your plan's consistency status.

Again, please accept our congratulations and don't hesitate to contact me with any questions about our review or next steps to take towards implementing your comprehensive plan.

Sincere Best Wishes,

A handwritten signature in black ink, appearing to read "Phil Carey". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Phil Carey  
Senior Planner  
Planning and Land Use Program

Cc (via email): Elizabeth Hertz, SPO Planning and Land Use Program  
Fred Snow, Kennebec County Council of Governments

May 25, 2011

David W. Bridges, Chair  
Comprehensive Planning Committee  
Town of Freedom  
71 Pleasant Street  
Freedom, ME 04941

Dear Mr. Bridges,

The State Planning Office wishes to thank the Town of Freedom for submitting its proposed Comprehensive Plan for review for consistency with the Growth Management Act (the Act) in accordance with the Comprehensive Plan Review Criteria Rule. We appreciate the hard work your committee members, other citizens and your consultants have put into this plan.

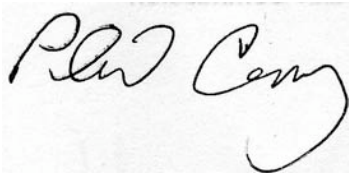
Since your plan was accepted for review, we have solicited comments from relevant state agencies, neighboring towns and your regional planning organization. During the comment period, we received written comments from the following state agencies: the Department of Inland Fisheries and Wildlife, the Department of Environmental Protection, the Department of Transportation and the Department of Conservation (Maine Forest Service). Those written comments are attached to this letter. The comments include a number of suggestions for strengthening the plan and we urge the Comprehensive Planning Committee to consider revising the draft plan in order to incorporating those suggestions.

I am happy to inform you that we find the draft 2011 Freedom Comprehensive Plan to be . This Notification of Completeness means that portions of the plan, other than the Future Land Use section, have been found by the Office to be consistent with the Act.

The Office will now begin its focused review of the plan's Future Land Use section for consistency with the Act. That review will be completed and a formal finding regarding the overall consistency of the entire comprehensive plan will be issued no later than Thursday, June 9, 2011.

Again, thank you for submitting your plan for our review. Please do not hesitate to contact me at 624-6216 or phil.carey@maine.gov if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Carey", is written over a light-colored rectangular background.

Phil Carey  
Senior Planner  
Planning and Land Use Program

Cc (via email): Elizabeth Hertz, SPO Planning and Land Use Program  
Fred Snow, Kennebec County Council of Governments

**Maine Department of  
Transportation**

**16 State House Station  
Augusta, Maine 04333-0016**

Telephone: 207-624-3240

Fax: 207-624-3099

Email: penny.vaillancourt@maine.gov



Paul R. LePage,  
Governor

David Bernhardt,  
Commissioner

Date: May 4, 2011

To: Phil Carey, Senior Planner, State Planning Office

From: Penny Vaillancourt

Re: Town of Freedom Comprehensive Plan Review

On behalf of the Maine Department of Transportation, I reviewed the Town of Freedom's March 2011 Comprehensive Plan and find it to be accurately represented in the Self Assessment Checklist.

**• Appropriate use of data provided by MaineDOT**

The Town of Freedom has appropriately used transportation data for comprehensive plan purposes.

**• Relation of plan's policies and implementation strategies to MaineDOT principal objectives and directives**

The Town of Freedom's 2011 Comprehensive Plan includes several policies and related strategies that, if successfully implemented, will effectively utilize transportation

facilities and resources.

• **Consistency of plan with MaineDOT programs and policies**

Pursuant to the goals, guidelines and policies of the Growth Management Act (30-A M.R.S.A. §4312 et seq.) and the Sensible Transportation Policy Act (23 M.R.S.A. §73) the Town of Freedom's 2011 Comprehensive Plan is consistent with MaineDOT programs and policies in carrying out the goals of these Acts. Please feel free to contact me should you have any questions regarding this information.

cc: Jerry Douglass, MaineDOT  
File

## Comprehensive Plan Review

Town of Freedom

Maine Forest Service

14 April 2011

One goal of the Maine Forest Service (MFS) is to ensure that Maine's forests, both urban and rural, will continue to provide benefits for present and future generations of Maine citizens. We do this by:

- a) developing, advocating for, and promoting activities that encourage sound, long-term management of forest resources;
- b) protecting forest resources from the effects of fire, insects, disease, and misuse; and,
- c) Providing accurate, relevant, and timely information about forest resources.

MFS respectfully submits these comments and observations for consideration.

General observation: MFS appreciates the town's attention to the retention of working forests and their contributions to protecting water quality in the plan. For landowners who choose to be long-term stewards of forest land, well-planned and managed timber harvesting can be economically rewarding to landowner and logger alike. Providing a policy and regulatory environment that rewards the beneficial outcomes of forest management will help with stated goals concerning open space and rural character.

Specific comments and recommendations:

The plan acknowledges that the town does not have a street tree program. Strong municipal street tree programs and street trees support a number of state goals for comprehensive planning. Street trees are part of the public infrastructure supported by comprehensive planning. Numerous studies have demonstrated the value of street trees beyond shade and beauty. Street trees play an important role in air filtration, stormwater interception, and increasing

both property values and business. All of these values support the state's goals of encouraging orderly growth and development, making efficient use of public services, planning for, financing and developing an efficient system of public facilities, and promoting an economic climate that increases overall economic well-being. Communities with town forests can also benefit economically from active management of their forest resources.

MFS recommends that the town contact MFS for additional assistance (see below).

MFS administers several programs that have and can continue to benefit both the town and its residents. Project Canopy, MFS's community forestry assistance program, is available to all Maine towns and cities. Project Canopy can assist financially with street tree planting and maintenance and continued forest management planning of town owned parcels. MFS encourages planners to recognize street trees and shade trees as part of the infrastructure, particularly in village and historical districts. Tree planting and maintenance is a viable way to improve downtown appearance, reduce pollution, and mitigate storm water runoff. Project Canopy provides cost share assistance for management planning on parcels such as these. Cost-share grants are available on a limited, competitive basis. Grant applications typically are available annually. For more information, go to: [www.maine.gov/doc/mfs/projectcanopy/](http://www.maine.gov/doc/mfs/projectcanopy/) or contact Jan Santerre at 207-287-4987.

MFS also administers the WoodsWISE program, directed toward family forest landowners with ownerships of less than 1000 acres. District Foresters are available to walk and talk with these landowners, to get them started on a path of stewardship and responsible forest management. MFS will help landowners secure consulting services from a licensed forester. Cost-share assistance is available to help with obtaining a Forest Management Plan, prepared by consultants. When harvesting is recommended, further advice and referral to trained and certified logging companies is available.

The plan references Best Management Practices. MFS's ["www.maine.gov/doc/mfs/pubs.htm"](http://www.maine.gov/doc/mfs/pubs.htm) Best Management Practices for Forestry: Protecting Maine's Water Quality is an appropriate reference manual for forestry and road, trail and driveway construction in and around Freedom's waters. Copies are available from MFS at

Use of inventory information:

MFS's Forest Policy and Management Division supports sustainable forest management by providing technical assistance, information and educational services to the public, forest landowners, forest products processors and marketers, municipalities, and other stakeholders.

MFS has ten District Foresters who provide technical assistance, conduct educational workshops, field demonstrations, media presentations, and can provide one-on-one contact with individual landowners. Morten Moesswilde is the District Forester who assists landowners in Freedom. He can be contacted

by phone at 207-441-2895, or by e-mail at [morten.moesswilde@maine.gov](mailto:morten.moesswilde@maine.gov).

Please direct questions or comments to:

Jan Ames Santerre

Project Canopy Coordinator

Department of Conservation - Maine Forest Service

22 State House Station

Augusta, ME 04333

Office: (207) 287-4987

Fax: (207) 287-8422

email: [jan.santerre@maine.gov](mailto:jan.santerre@maine.gov)



PAUL R. LEPAGE  
GOVERNOR  
JAMES P. BROOKS  
ACTING COMMISSIONER  
STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

To: Phil Carey, State Planning Office

From: Kristin Feindel, DEP-Division of Watershed Management

Re: Freedom Comprehensive Plan Review

Date: May 11, 2011

I have reviewed the Town of Freedom's Comprehensive Plan's Water Resources section in regards to freshwater surface waters. The comments submitted below follow the Maine State Planning Office's instructions for agency comments.

**Appropriate use of data provided by the DEP Division of Watershed Management**

- The Town of Freedom's Comprehensive Plan includes river, stream, and pond identification and description, and watershed information. This information is used appropriately.

**How the plan's policies and implementation strategies promote the State goals relating to DEP's principal objectives and directives**

- The Town of Freedom's Comprehensive Plan does a good job providing

information on Sandy Pond and the larger streams in town. A few more specific strategies on how the town is going to protect the pond and streams would strengthen the plan.

- For streams, consider upgrading shoreland zoning to include first order streams and/or creating conservation easements for riparian areas.

**Consistency of plan with DEP’s programs and policies; Measures DEP recommends the town take to ensure its plan addresses and identifies deficiencies and inconsistencies**

- The Town of Freedom’s Comprehensive Plan is consistent with the DEP Division of Watershed Management’s programs.
- There are no major deficiencies or inconsistencies. Specific plan comments follow in the checklist below.

Please feel free to contact me directly at 287-5586 or [kristin.b.feindel@maine.gov](mailto:kristin.b.feindel@maine.gov) if you have additional questions or would like more information.

Completed by: Kristin Feindel Date: 5/11/11

**Water Resources**

, N/A Page SPO Review

**Analyses and Key Issues**

1. Are there point sources (direct discharges) of pollution in the community? If so, is the community taking steps to eliminate them?	x	44	KBF
2. Are there non-point sources of pollution related to development, agriculture, forestry or other uses that are affecting surface water resources and riparian areas? If so, are existing regulations	x	44	KBF
sufficient to protect these resources?			
3. Are point and/or non-point sources of pollution threatening groundwater supplies?	x	44	KBF
4. Are public groundwater supplies and surface water supplies and their recharge areas adequately protected? Are any public water supply expansions anticipated? If so, have suitable sources been identified and protected?	x	43-44	

- |   |   |    |     |
|---|---|----|-----|
| 6. What non-regulatory measures can the community take to protect or enhance water quality? Are there opportunities to partner with local or regional advocacy groups that promote water resource protection?   | x | 44 | KBF |
| 7. Do local road construction and maintenance practices and standards adequately protect water resources? Do public works crews and contractors use best management practices in daily operations (e.g. salt/sand pile maintenance, culvert replacement street sweeping, public works garage operations)? | x | 43 | KBF |
| 8. Are floodplains adequately identified and protected? Does the community participate in the National Flood Insurance Program? If not, should it? If so, is the floodplain management ordinance up to date and consistently enforced?  | x | 43 |     |

**Conditions and Trends**

- |   |   |       |                   |
|---|---|-------|-------------------|
| 1. The community's Comprehensive Planning Water Resources Data Set prepared and provided to the community by the Department of Inland Fisheries and Wildlife, the Department of Environmental Protection, and the Office, or their designees.                         | x | 42-44 | KBF               |
| 2. A description of each lake, pond, river and stream including:<br>a. Ecological, economic, and recreational values;<br>b. Current watershed land uses;<br>c. Threats to water quality or quantity;<br>d. Documented water quality and/or invasive species problems. | x | 42-43 | KBF<br>(1)<br>(2) |
| 3. A list of water resource advocacy groups active in the community.  | x | 44    | KBF               |
| 4. A summary of past and present activities to monitor, assess and/or improve water quality, mitigate sources of pollution, and control or prevent the spread of invasive species.  | x | 42    | KBF               |
| 5. A description of the location and nature of significant threats to drinking water supplies.  | x | 44    |                   |
| 6. A summary of existing lake, pond, river, stream and drinking water protection and preservation measures, including local ordinances.   | x | 44    | KBF               |

**Comments:**

- (1) It would be good to note that Sandy Pond is on the DEP's Most at Risk from Development List (Chapter 502). This list is used by the DEP for developments requiring either a Stormwater permit or Site Location of Development permit. Development projects located in these watersheds are required to meet additional standards.
- (2) Including a general discussion of the sensitivity and potential threats to riparian areas would be beneficial.



## Water Resources (*cont.*)

, N/A Page SPO  
Review

### **Policies** (minimum required to address State goals)

1. To protect current and potential drinking water sources.

x 44

2. To protect significant surface water resources from pollution and improve water quality where needed.

x 44 KBF

3. To protect water resources in growth areas while promoting more intensive development in those areas.

x 44 KBF

4. To minimize pollution discharges through the upgrade of existing public sewer systems and wastewater treatment facilities.

x 44 KBF

5. To cooperate with neighboring communities and regional/local advocacy groups to protect water resources.

x 44 KBF

### **Comments:**

### **Strategies** (minimum required to address State goals)

1. Amend local land use ordinances as applicable to incorporate stormwater runoff performance standards consistent with:

x 46 KBF

a. The Maine Stormwater Management Law and Stormwater Rules (Title 38 MRSA Section 420-D and 06-096 CMR 500 and 502).

b. DEP's allocations for allowable levels of phosphorus in lake/pond watersheds.

c. The Maine Pollution Discharge Elimination System Stormwater Program

2. Update the floodplain management ordinance to be consistent with state and federal standards.	x	45	
3. Consider amending local land use ordinances, as applicable, to incorporate low impact development standards.	x	45	KBF
4. Where applicable, develop an urban impaired stream watershed management or mitigation plan that will promote continued development or redevelopment without further stream degradation.		n/a	KBF
5. Enact public wellhead and aquifer recharge area protection mechanisms, as necessary.	x	45	KBF
6. Provide water quality "best management practices" information to farmers and loggers.	x	44	KBF
7. Adopt water quality protection practices and standards for construction and maintenance of public roads and properties and require their implementation by the community's officials, employees and contractors.	x	45	KBF
8. Participate in local and regional efforts to monitor, protect and, where warranted, improve water quality.	x	45	KBF
9. Provide educational materials at appropriate locations regarding invasive species.	x	45	KBF

**Comments:**

Strategies #4 Freedom does not fall within the purview of this.

**Maine Department of  
Inland Fisheries and  
Wildlife**  
**284 State Street**  
**Augusta, Maine 04333-  
0041**



Paul LePage,  
Governor

Telephone: 207-287-5758  
Fax: 207-287-6395  
Email: bethany.atkins  
@maine.gov



Chandler Woodcock,  
Commissioner

Date: May 5, 2011

To: Phil Carey

From: Bethany Atkins

Re: Town of Freedom Comprehensive Plan Review 2011

On behalf of the Maine Department of Inland Fisheries and Wildlife (MDIFW), the Beginning with Habitat program (BwH), and the Maine Natural Areas Program (MNAP), we have reviewed the 2011 Town of Freedom Comprehensive Plan and have provided the following comments.

As you are aware, MDIFW's mission is focused on the protection and enhancement of the State's freshwater fisheries and wildlife. MNAP has a commitment to conserving lands in Maine that support rare, threatened, and endangered plants and animals, and rare or exemplary natural communities. The BwH program provides objective and comprehensive habitat information to equip local decision-makers with the necessary tools to make informed and responsible land use decisions that mesh wildlife habitat conservation with future town growth needs. The comments submitted below are based on the Maine State Planning Office's (SPO) instructions for agency

commentors.

Please feel free to contact me should you have any questions regarding this information.

- **Appropriate use of data provided by MDIFW & MNAP**

The Town of Freedom has accurately and appropriately represented most of the Beginning with Habitat information provided regarding high value plant and animal habitats. Missing from this plan is reference to the Unity Wetlands Focus Area, a focus area of statewide ecological significance. We encourage Freedom to include this information on the Critical Resources Map and provide a description of this area and its unique values in the plan text. More information about the Unity Wetlands Focus Area is available here:

Beginning with Habitat data depicting high value plant and wildlife habitats and critical natural resources is available to all Maine towns. This information is regularly updated and should be requested often in the future to ensure that land use decisions are based on the best available information.

- **Relation of plan's policies and implementation strategies to MDIFW & MNAP principal objectives and directives**

The Freedom Comprehensive Plan proposes a variety of strategies ranging from landowner education and outreach promoting land conservation and stewardship to developing regulatory standards intended to better direct growth to designated growth areas and conserve critical natural resources.

The Beginning with Habitat program is available to assist towns with achieving natural resources protection goals. As Freedom works toward developing and implementing their identified strategies, we encourage the town to contact Beginning with Habitat and to visit our website and online toolbox for specific tools to protect plant and wildlife resources:

([http://www.beginningwithhabitat.org/toolbox/about\\_toolbox.html](http://www.beginningwithhabitat.org/toolbox/about_toolbox.html)).

- **Consistency of plan with MDIFW & MNAP programs and policies**

This plan is consistent with MDIFW and MNAP programs and policies. We do, however, encourage the town to incorporate the suggestions provided below before finalizing this plan.

*Specific plan comments and recommendations are provided below. Comments provided by Bethany Atkins and Keel Kemper, MDIFW.*

Future Land Use Plan	,	N/A	Page	IFW Review
<b>Analyses and Key Issues</b>				
1. How does the Future Land Use Plan align and/or conflict with the community's vision statement?	x		87, 91-95	
2. How is the configuration of the growth areas shaped by natural opportunities and/or constraints (i.e. the physical suitability or unsuitability of land for development)? The location of public facilities? The transportation network?	x		89-90	
3. How does the Future Land Use Plan relate to existing regional economic, housing, transportation and natural resource plans? How does the Future Land Use Plan relate to recent development trends?	x		81-85,87-95	
4. Are most municipal capital investments currently directed toward growth areas? Why or why not?	x		78-79,95	
5. How can critical resource areas be effectively protected from future development impacts?			90,92-94	
<b>Components</b>				
1. A map or maps showing the following land use areas and any smaller land use districts within them: Growth (unless exempted), Rural, Critical Resource, and Transition (if proposed).	x		104	1.

2. A narrative description of each land use area including: 89-90
- a. The area’s relationship to the community’s vision;
  - b. The names of any smaller land use districts within the area;
  - c. The area’s natural opportunities and/or constraints;
  - d. The area’s transportation system;
  - e. The types and intensity of proposed land uses, including the range of residential densities;
  - f. The area’s proximity to existing and proposed public facilities and services;
  - g. The compatibility or incompatibility of proposed uses to current uses within and around the area along with any special development considerations (e.g. need for additional buffers, architectural design standards, etc.); and
  - h. Any anticipated major municipal capital investments needed to support the proposed land uses.

3. A summary of the key regulatory and non-regulatory approaches, including investment policies and strategies, the community will use to implement its Future Land Use Plan. x 91-94 2.

**Comments:**

**MDIFW Comments:**

**1. Pg. 104, Future Land Use Map:** We encourage Freedom to include the Shoreland Zone

on the Future Land Use Map to give a more accurate depiction of the proposed “Critical Resource Area” described along with Village, Village Growth, and Rural Areas in the Future Land Use Plan.

**2.** A variety of strategies intended to protect high value habitat are proposed to implement Freedom’s Future Land Use Plan. Included are education and outreach campaigns to promote stewardship, conservation, and development design that will limit impact on natural resources; allowing higher density in growth areas to limit development sprawl and habitat fragmentation; and development of an open space plan to better identify important areas and specific strategies for their protection. Freedom proposes to use Shoreland Zoning as a primary means to protect Critical Resource Areas and to promote open space subdivisions in rural areas as well. We encourage the Town to visit the Beginning with Habitat Online Toolbox for examples of Shoreland Zoning ordinances and Conservation Subdivision ordinances that best protect natural resource values. The Online Toolbox is available here:

[http://www.beginningwithhabitat.org/toolbox/about\\_toolbox.html](http://www.beginningwithhabitat.org/toolbox/about_toolbox.html).

Future Land Use Plan ( <i>cont.</i> )	✓	N/A	Page	IFW Review
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**Policies**

- |   |   |  |       |  |
|---|---|--|-------|--|
| 1. To coordinate the community’s land use strategies with other local and regional land use planning efforts. | x |  | 91,93 |  |
|---|---|--|-------|--|

2. To support the locations, types, scales, and intensities of land uses the community desires as stated in its vision.	x	88-94
3. To support the level of financial commitment necessary to provide needed infrastructure in growth areas.	x	91
4. To establish efficient permitting procedures, especially in growth areas.	x	92
5. To protect critical resource areas from the impacts of development.	x	93-95

**Strategies**

1. Assign responsibility for implementing the Future Land Use Plan to the appropriate committee, board or municipal official.	x	95
2. Using the descriptions provided in the Future Land Use Plan narrative, enact or amend local ordinances as appropriate to:	x	91-94
a. Clearly define the desired scale, intensity, and location of future development;		
b. Establish fair and efficient permitting procedures and appropriate fees, and streamline permitting procedures in growth areas; and		
c. Clearly define protective measures for critical resource areas.		
3. Include in the Capital Investment Plan anticipated municipal capital investments needed to support proposed land uses.	x	79,91,95
4. Meet with neighboring communities to coordinate land use designations and regulatory and non-regulatory strategies.	x	73,91
5. Provide the code enforcement officer with the tools, training, and support necessary to enforce land use regulations, and ensure that the Code Enforcement Officer is certified in accordance with	x	92

**See 2.**

30-A MRSA §4451.

6. Track new development in the community by type and location.	x	95
7. Periodically (at least every five years) evaluate implementation of the plan in accordance with Section 2.8.	x	95

**Comments:**

Transportation	, N/A	Page	IFW Review
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**Analyses and Key Issues**

*Roads, Bridges, Sidewalks, and Bicycle Routes*

1. What are the concerns for transportation system safety and efficiency in the community and region? What, if any, plans exist to address these concerns, which can involve::  i. Safety; ii. Traffic speed; iii. Congestion and travel delay; iv. Travel volume and type; v. Traffic problems caused by such things as road and driveway locations and design, road maintenance needs, traffic control devices, growth patterns and lack of transportation options; vi. Lack of transportation links between neighborhoods, schools, recreation, shopping, and public gathering areas; vii. Closed or posted bridges or roads; viii. Pedestrian and bicycling safety; ix. Light pollution.	x	30-32
2. What conflicts are caused by multiple road uses, such as a major state or U.S. route that passes through the community or its downtown and serves as a local service road as well?	x	31-32
3. Upon review of state and regional transportation plans, what are their impacts on your current and future community plans? What actions can the community take to address identified impacts?	x	32



x 32  
 4. How do the community's land use regulations mesh with the MaineDOT, regional, and local objectives for transportation system facilities in the community? If growth areas are located on arterial highways, how will growth in these areas affect the ability of the arterial to safely and efficiently move traffic?

x 30-31  
 5. What is the community's schedule for regular investments in road maintenance and improvement? How are Maine DOT Urban-Rural Initiative Program (URIP) funds used to off-set municipal road improvement costs?

x 30  
 6. What concerns does your community have regarding its policies and standards for design, construction and maintenance of public and private local roads and bridges?

*Parking*

x 31  
 7. What are the parking issues in the community?

n/a  
 8. Do local parking standards promote development in desired areas or do they drive it to outlying areas?

n/a  
 9. How do local ordinances consider safety related to parking lot layout and circulation for vehicles, pedestrians and all other users?

x 31  
 10. What community investments are needed to expand or improve parking?

**Comments: Analysis & Key Issues 8 and 9:**There are no specific parking standards.

Transportation (cont.) , N/A Page IFW Review

**Analysis and Key Issues** (cont.)  
*Other modes of transportation*

x 32  
 11. What transit services are available to meet the current and future needs of community residents? If transit services are not adequate, how will the community address the needs?

n/a  
 12. If the community hosts a major transportation terminal, such as an airport, rail or ferry terminal, how does it connect to other transportation systems?

	n/a		
13. If the community hosts any public airports, what coordination has been undertaken to ensure that required airspace is protected now and in the future? How does the community coordinate with the owner(s) of private airports?			
<i>Environmental and cultural considerations</i>			
14. What, if any, environmental degradation caused by state or local transportation facilities or operations (i.e. wildlife mortality, habitat fragmentation, erosion, groundwater contamination, non-point source pollution) is occurring?	x	32,45	<b>3.</b>
15. What are community's objectives for preserving or protecting important identified scenic, historic, or cultural resources adjacent to transportation facilities?	x	32,51	
16. How does the community address any transportation-related noise concerns?	x	32,4950	
17. What steps can the community take to encourage development to occur in a manner that minimizes transportation-related environmental impacts such as habitat fragmentation and/or vehicular CO <sub>2</sub> emissions?	x	32,34,45	<b>4.</b>
<i>Land use</i>			
18. How do existing and proposed major transportation facilities complement the community's vision?	x	31-36	
19. How do local land use decisions affect safety, congestion, mobility, efficiency and interconnectivity of the transportation system?	x	31-32	
20. How do existing land uses and development trends support or inhibit cost effective passenger transportation systems and the efficient use of freight rail systems?	x	32	
21. Does the community have in place, or does it need to put into place, access management or traffic permitting measures? How do these measures correlate with MaineDOT's access management program and regulations for traffic permitting of large development?	x	32,34	

22. How do the community's local road design standards support the type of village, suburban, or rural land use patterns the town wants? x 49-50

23. Do planned or recently built subdivision roads (residential or commercial) simply dead-end or do they allow for expansion to adjacent land and encourage the creation of a network of local streets? Where dead-ends are unavoidable, are mechanisms in place to encourage shorter dead-ends resulting in compact and efficient subdivision designs? x 34

**Comments:**  
**MDIFW Comments:**

.3. Fragmentation of both aquatic and terrestrial habitats can result from roads and is likely occurring in Freedom. MDIFW encourages the town to include the information below in their Comprehensive Plan.

Poorly sized, installed or maintained culverts and other water crossing structures can physically block fish passage and/or result in increased flow velocities that cause excessive channel scouring, bank slumping and flows that limit fish and aquatic invertebrate passage in streams. These structures can lead to local extinctions of fish species and declines in recreational fishing opportunities.

Similarly, roads can be a hazard and barrier for terrestrial species. Wildlife need to be able to freely move across the land to find food, find a mate, access different habitats and to adapt to range shifts as a result of a changing climate. Wildlife most commonly travel along riparian corridors (shorelines), along ridgelines and where there is suitable cover. Roads can be a barrier to many species and can result in increased wildlife mortality. Maintaining a landscape of connected habitat blocks is essential to maintaining healthy and diverse wildlife populations especially as Maine's rural landscapes become more developed and fragmented. Maintaining a connected landscape also helps to sustain important outdoor recreation opportunities and support local trail networks.

4. To encourage development to occur in a manner that minimizes transportation-related environmental impacts such as habitat fragmentation, MDIFW encourages Freedom to add an action item that would encourage their public works department to become familiar with the Maine Department of Transportation's *Waterway and Wildlife Crossing Policy and Design Guide* and to require that future and replacement road crossing structures incorporate these design recommendations, allowing for wildlife passage through culverts and other stream crossing structures.

Similarly, on pg. 36. a strategy to maintain wildlife corridors is identified. Beginning with Habitat has recently completed a habitat connectivity model that will highlight potentially valuable terrestrial habitat corridors and serve as a starting point for towns and conservation groups to identify habitat connectors. The BwH Online Toolbox also provides example tools intended to maintain habitat connectivity. This data may be useful as Freedom begins to implement this strategy, identify important corridors and identify means of mitigating impacts where wildlife corridors cross roads. Contact BwH for more information.

We also encourage Freedom to consider amending the subdivision road standards mentioned (pg. 34) to require developers to design projects in a manner that will maintain existing habitat values and minimize barriers to both aquatic and overland species travel. See the BwH Toolbox ([http://www.beginningwithhabitat.org/toolbox/about\\_toolbox.html](http://www.beginningwithhabitat.org/toolbox/about_toolbox.html)) for examples of possible standards.

Transportation (cont.)

N/A

Page

IFW  
Review

**Analysis and Key Issues** (cont.)

*Coastal communities only:*

n/a

24. What land-side and water-side transportation facilities are needed?

25. How does the community protect access to facilities for island travelers, currently and in the future? n/a

26. How do the community's land use regulations mesh with MaineDOT, regional and local objectives for marine transportation facilities? n/a

**Conditions and Trends**

1. The community's Comprehensive Planning Transportation Data Set prepared and provided to the community by the Department of Transportation and the Office, or their designees. x 28-32

*Highways, Bridges, Sidewalks, and Bicycle Routes*

2. Location and overall condition of roads, bridges, sidewalks, and bicycle facilities, including any identified deficiencies or concerns. x 28-32

3. Identify potential off-road connections that would provide bicycle and pedestrian connections to neighborhoods, schools, waterfronts and other activity centers. x 32

4. Identify major traffic (including pedestrian) generators, such as schools, large businesses, public gathering areas/activities etc. and related hours of operation. x 31

5. Identify policies and standards for the design, construction and maintenance of public and private roads. Identify the location of private roads and assess their potential to become public roads. x 82-85, 108, 32 **See 4.**

*Parking*

6. List and locate municipal parking areas including size, condition, and usage. x 31

*Other Modes of Transportation*

7. List and locate all airports within or adjacent to the community and describe applicable airport zoning and airspace protection ordinances in place. n/a

8. Identify inter-local, fixed route, commuter and demand response bus or van services, including private or public operator information and local government involvement. x 32

*Environmental and Cultural Considerations*

9. Location of evacuation routes identified in an emergency response plan, if applicable.	x	68
10. Identify areas with transportation related noise concerns.	x	32
11. Identify areas where inappropriate lighting affects transportation safety.	x	32
12. Identify and describe scenic, historic, or cultural resources within or adjacent to transportation facilities that the community wants to protect, such as street trees, covered bridges, etc.	x	32

**Comments:**

**Transportation (cont.)**

, N/A Page IFW Review

**Conditions and Trends (cont.)**

13. Known locations with opportunities to restore habitat connections disrupted by a transportation facility owned and maintained by the community.

x 32 5.

14. Identify current local land use management strategies (such as access management, zoning, density, minimum lot size standards) that enhance or detract from the safety and efficiency of the transportation system (including highway, air, bus, bike, pedestrian, marine, and rail services.)

x 31-32

*Coastal Communities only:*

15. Location of current and potential seaport terminals. Identify whether seaport terminal is of local, regional, or state significance, its ownership/management and use (type and quantity/frequency of goods shipped in or out). List land-side and water-side facilities associated with port.

n/a

16. Identify public ferry service and private boat transportation support facilities (may be covered under Marine Resources with cross reference) including related water-side (docks/piers/wharves) and land side (parking) facilities.

n/a

**Comments:**

**MDIFW Comments:**

**5.** Freedom has the opportunity to identify and assess existing water crossing structures for their potential as barriers to fish and aquatic species passage and to incorporate this information and the repair or replacement of these structures into the town's existing road maintenance and repair plans or stream restoration efforts.

Freedom also has the opportunity to identify and maintain valuable overland habitat corridors. As mentioned previously, BwH is in the process of developing a terrestrial habitat connectivity model that will highlight potentially valuable terrestrial habitat. For more information contact BwH.

**Policies** (minimum required to address State goals)

	x	33
1. To prioritize community and regional needs associated with safe, efficient, and optimal use of transportation systems		
	x	33
2. To safely and efficiently preserve or improve the transportation system.		
	x	33
3. To promote public health, protect natural and cultural resources and enhance livability by managing land use in ways that maximize the efficiency of the transportation system and minimize increases in vehicle miles traveled.		
	x	33
4. To meet the diverse transportation needs of residents (including children, the elderly and disabled) and through travelers by providing a safe, efficient and adequate transportation network for all types of users (motor vehicles, pedestrians, bicyclists).		
	x	33
5. To promote fiscal prudence by maximizing the efficiency of the state or state-aid highway network.		

**Comments:**

**Strategies** (minimum required to address State goals)

	x	33
1. Develop or continue to update a prioritized ten-year improvement, maintenance and repair plan for local/regional transportation system facilities that reflects community, regional and state objectives.		
	x	34
2. Initiate or actively participate in regional and state transportation and land use planning efforts.		

3. Enact or amend local ordinances as appropriate to be consistent with local, regional and state transportation policies identified in this plan.	x	34
4. Enact or amend local ordinances as appropriate to address or avoid conflicts with:	x	34
a) Policy objectives of the Sensible Transportation Policy Act (23 MRSA §73);		
b) State access management regulations pursuant to 23 MRSA §704; and		
c) State traffic permitting regulations for large developments pursuant to 23 MRSA §704-		
A.		
5. Enact or amend ordinance standards for subdivisions and for public and private roads as appropriate to foster transportation-efficient growth patterns and provide for future street and transit connections.	x	34
6. Work with the MaineDOT as appropriate to address deficiencies in the system or conflicts between local, regional and state priorities for the local transportation system.	x	36

**Comments:**

Recreation	,	N/A	Page	IFW Review
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**Analyses and Key Issues**

1. Will existing recreational facilities and programs in the community and region accommodate projected changes in age groups or growth in your community?	x	54
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2. Is there a need for certain types of services or facilities or to upgrade or enlarge present facilities to either add capacity or make them more usable?	x	54	
3. Are important tracts of open space commonly used for recreation publicly owned or otherwise permanently conserved?	x	53-54	
4. Does the community have a mechanism, such as an open space fund or partnership with a land trust, to acquire important open spaces and access sites, either outright or through conservation easements?	x	54	
5. Does the public have access to each of the community's significant water bodies? Is the type of access compatible with the protection of public drinking water sources?	x	54	<b>6.</b>
6. Are recreational trails in the community adequately maintained? Are there use conflicts on these trails?	x	53	
7. Is traditional access to private lands being restricted?	x	53	

**Conditions and Trends**

1. The community's Comprehensive Planning Recreation Data Set prepared and provided to the community by the Department of Conservation and the State Planning Office, or their designees.	x	53-54	
2. A description of important public and private active recreation programs, land and water areas (including hunting and fishing areas), and facilities in the community and region, including regional recreational opportunities as appropriate, and identification of unmet needs.	x	53-54	
3. An inventory of any fresh or salt water bodies in the community determined locally to have inadequate public access.	x	54	<b>6.</b>
4. A description of trail systems, trail management organizations, and conservation organizations that provide trails for all-terrain vehicles, snowmobiling, skiing, mountain biking or hiking. Include mapped information as available.	x	53,107	
5. A map or list of important publicly-used open spaces and	x	106	

associated facilities, such as parking and toilet facilities.

x 53

6. A list of local and regional land trusts in the area.

**Comments:**

**MDIFW Comments:**

6. There are several streams in Freedom that likely provide important fishery resources and are not identified as having adequate public access. We encourage the town to contact Bobby Van Riper (547-5314), MDIFW Region B Fisheries Biologist, for more information on the town's fishery resources and public access opportunities and to include that information into this plan and into the town's the future open space plan.

**Recreation (cont.)**

, N/A Page IFW Review

**Policies** (minimum required to address State goals)

1. To maintain/upgrade existing recreational facilities as necessary to meet current and future needs.

x 54

2. To preserve open space for recreational use as appropriate.

x 54

3. To seek to achieve or continue to maintain at least one major point of public access to major water bodies for boating, fishing, and swimming; and work with nearby property owners to address concerns.

x 54

**Strategies** (minimum required to address State goals)

1. Create a list of recreation needs or develop a recreation plan to meet current and future needs. Assign a committee or town official to explore ways of addressing the identified needs and/or implementing the policies and strategies outlined in the plan.

x 54 7.

2. Include any capital needs identified for recreation facilities in the Capital Investment Plan.

x 55

3. Work with public and private partners to extend and maintain a network of trails for motorized and non-motorized uses. Connect with regional trail systems where possible.

x 55

- |  |   |    |
|--|---|----|
| 4. Work with a local land trust or other preservation organization to pursue opportunities to protect important open space or recreational land. | x | 56 |
| 5. Provide education regarding the benefits and protections for landowners allowing public recreational access on their property.                | x | 56 |

**Comments:**

**MDIFW Comments:**

7. The Beginning with Habitat Online Toolbox includes a useful section on developing open space plans that we encourage the Town of Freedom to view as it begins development of its proposed open space plan. This document not only addresses recreation values, but open space planning to strategic protect natural resource values as well. Visit <http://www.beginningwithhabitat.org/toolbox/osp1.html>.

**Critical Natural Resources**

, N/A Page IFW Review

**Analysis and Key Issues**

- |   |   |       |
|---|---|-------|
| 1. Are existing regulations sufficient to protect the community's critical natural resources threatened by development, overuse, or other activities?                                 | x | 49-50 |
| 2. Are local shoreland zone standards consistent with state guidelines and with the standards on adjacent shorelands in neighboring towns?  | x | 49    |
| 3. What non-regulatory measures can the community take to protect critical natural resources? Are there opportunities to partner with local or regional advocacy groups?              | x | 50    |
| 4. Is there current regional cooperation or planning underway to protect shared critical natural resources?   | x | 50    |
| 5. In what other areas will protection of critical natural resources advance comprehensive plan policies (e.g. water resources, economy, recreation, agriculture and forestry, etc.)? | x | 50    |

**Comments:**

**Conditions and Trends**

- |  |   |       |           |
|--|---|-------|-----------|
|  | x | 47-50 | <b>8.</b> |
| <p>1. The community's Comprehensive Planning Critical Natural Resources Data Set prepared and provided to the community by the Department of Inland Fisheries and Wildlife, Department of Environmental Protection, and the Office or their designees.</p> |   |       |           |
|  | x | 49    |           |
| <p>2. A map or description of significant scenic areas and scenic views of local importance, and regional or statewide importance if available.</p>  |   |       |           |

**Comments:**

**MDIFW Comments:**

**8. a.** pg. 48, Essential Wildlife Habitat- This paragraph should be updated. While the bald eagle nest site on Sandy Pond still exists, bald eagle nest sites are no longer protected as Essential Wildlife Habitat. In 2008 bald eagles were removed from the threatened and endangered species list and Essential Habitat protections removed as a result. Bald eagles remain listed as a species of special concern and they remain protected by the US Fish and Wildlife Service under the Bald and Golden Eagle Act.

**b.** pg. 48, Deer Wintering Areas- this paragraph should be updated as well to correct mis-information. Non-forested wetlands do not function as Deer Wintering Areas. In Maine deer yards are characterized by contiguous stands of softwood cover. In Central Maine, Hemlock is a very large component of Deer Wintering Areas. Efforts to promote and maintain large stands of softwood shelter are necessary in order to maintain viable deer winter shelter in the town of Freedom. In addition, Gerry Lavigne is no longer a biologist with MDIFW.

**c.** pg. 49, Inland Wading Bird and Waterfowl Habitat- IWWH are not noted for their "wintering" habitat for waterfowl. We encourage Freedom to delete this reference. In addition, we encourage the town to include a discussion of high and moderate value IWWH's and the protections that these areas receive as Significant Wildlife Habitat under the Natural Resources Protection Act.

**d.** pg. 49- A discussion of Significant Vernal Pools should also be included in this plan. Significant Vernal Pools are also protected as Significant Wildlife Habitat under the Natural Resources Protection Act.

**e.** This plan includes very little information on the town's fishery resources. Please contact Bobby Van River (547-5314) for information.

**f.** The Unity Wetlands Focus Area, a focus area of statewide ecological significance should be depicted on the Critical Natural Resources Map and description of the area and its unique values referenced in the plan text. Focus areas offer unique concentrations of at-risk species and habitats. They are not regulatory designations intended to promote strategic approaches to conservation. For more information on focus areas and the Unity Wetlands Focus Area, please visit: <http://www.maine.gov/doc/nrimc/mnap/focusarea/index.htm>.

**Policies** (minimum required to address State goals)

- |  |   |    |  |
|--|---|----|--|
|  | x | 50 |  |
| 1. To conserve critical natural resources in the community.  |   |    |  |
|  | x | 50 |  |
| 2. To coordinate with neighboring communities and regional and state resource agencies to protect shared critical natural resources. |   |    |  |

**Comments:**

**Strategies** (minimum required to address State goals)

- |   |   |    |            |
|---|---|----|------------|
|   | x | 49 | <b>9.</b>  |
| 1. Amend local shoreland zone standards to meet current state guidelines.   |   |    |            |
|   | x | 51 |            |
| 2. Designate critical natural resources as Critical Resource Areas in the Future Land Use Plan.   |   |    |            |
|   | x | 51 |            |
| 3. Through local land use ordinances, require subdivision or non-residential property developers to look for and identify critical natural resources that may be on site and to take appropriate measures to protect those resources, including but not limited to, modification of the proposed site design, construction timing, and/or extent of excavation. |   |    |            |
|   | x | 51 | <b>10.</b> |
| 4. Through local land use ordinances, require the planning board (or other designated review authority) to incorporate maps and information provided by the Maine Beginning with Habitat program into their review process.   |   |    |            |

- |   |   |    |               |
|---|---|----|---------------|
| 5. Adopt natural resource protection practices and standards for construction and maintenance of public roads and properties and require their implementation by the community's officials, employees, and contractors. | x | 52 | <b>See 4.</b> |
| 6. Initiate and/or participate in interlocal and/or regional planning, management and/or regulatory efforts around shared critical natural resources.   | x | 52 |               |
| 7. Pursue public/private partnerships to protect critical natural resources such as through purchase of land or easements from willing sellers.   | x | 52 |               |
| 8. Distribute or make available information to those living in or near critical natural areas about applicable local, state or federal regulations.   | x | 52 |               |

**Comments:**

**MDIFW Comments:**

- 9.** Additional protections can be provided to valuable water resources including smaller wetlands and headwater streams, areas key to protecting water quality, wildlife habitat and recreational opportunity, by augmenting Shoreland Zoning standards. We encourage the Town of Freedom to visit the BwH Toolbox for examples of these standards that can better protect local and regional water resources.
- 10.** BwH information is updated regularly. We encourage Freedom to request information often to assure they have the most up to date wildlife habitat information available.