

Ms. Debra Kaczowski
Maine Land Use Planning Commission
PO Box 1107
Greenville ME 04441

Via email

July 22, 2022

RE: Big Lake Development Company, LLC'S Application for Development Permit DP 3639-F

Dear Ms. Kaczowski:

I am writing to express my concern over the adequacy of the proposed Big Moose Resort Permit Application and the seemingly intentional obfuscation regarding the full extent of the project buildout, proposed ownership, and financial ability. The ski resort alone has the potential to provide year-round employment opportunities, recreational facilities to enhance the region's tourism market, and a jewel in the pocket of the local community. Yet, Big Moose Development, LLC (Applicant) and its associates have seemingly intentionally limited resource investigations and Permit Application materials to the bare minimum and have provided as little information as possible to the public.

The initial Permit Application dated March 22, 2021 contains multiple inconsistencies and is remarkably incomplete and poorly documented given this project was conceived of and planning began at least three years ago. The Application contains multiple references to a project area of various sizes, multiple numbers of hotel rooms, and multiple references to differing square footage of and foot print of the base lodge. Natural resource studies included in the Application and subsequently submitted to LUPC are not particularly robust. Even the authors managed to include disclaimers in their text suggesting they did the best they could with the limitations put on them.¹ Nowhere in the Application record is there a clear description of the full scale of the project, the entities involved, or the planned final disposition of properties. For example, the fact that the ski resort portion of development – Phase I and the subject of this permit application – will ultimately be gifted to Piscataquis County is buried, in small print, in an attachment to a letter from Barclays in Exhibit 4. The Town of Greenville and Moosehead Lake Economic Development Corporation are prominently listed at the top of the Project Structure with Piscataquis County at the very bottom of the page of the same document. Their roles are not described anywhere.

¹ See reports submitted by Boyle Associates, Tetra Tech and Weston & Sampson.

Comments and Questions

1. LUPC Commission Chair and the Applicant insist that the public and resource agencies review the Phase 1 Permit Application on its own merits, and have made it clear they will not entertain questions regarding any subsequent development phases yet the permit application, resource reports, agency correspondence, and financial documents are littered with references of future development. It is a disservice to all parties concerned to try and separate consideration project components when all phases are intrinsically connected.

- a. MDOT Traffic Movement Permit Application. Completed by Sewall, this document addressed only traffic estimates for the resort area. There is no mention of a 500-unit residential complex, nor any reference to a 200-slip marina, yet these proposed developments are part of the overall plan and would most certainly impact traffic on Route 15 and throughout Greenville. It may also impact placement of a new wastewater disposal line from the resort to Greenville Junction. In fact, the permit application contains the statement:

“The Town of Greenville Code Enforcement Officer was contacted to determine if there are any other pending or approved developments that are expected to significantly impact traffic volumes on Route 6/15 in the area. *No other development projects with significant trip generation were identified by the Town or at the Scoping Meeting.*” [Emphasis added.]

While the Town Code Enforcement Officer may not have been aware of the remaining development yet to come, Sewell, the Applicant, and the Town Manager certainly did.

- b. Exhibit 4 -- Financial Capacity. This section specifically states that municipal bonds issued for Phase I land acquisition and construction will be paid for in part, from revenues derived from the Phase II real estate development. LUPC cannot effectively evaluate the financial capacity of the Applicant to fund its proposal without examining future phases of the proposed project. As proposed, Phase I cannot be independently approved financially without the remainder of the project being considered.
- c. Utilities. Are all utility components and associated features being sized adequately to accommodate the full project build-out (all phases)? It seems reasonable to assume that wastewater disposal, water supply, electrical, fiber optic, and any other utility common to Phase I and future

phases will be sized and constructed appropriately now, so they will not need to be upgraded at the beginning of future planned construction.

2. Project funding costs.

- a. Marina costs were retained in the March 2022 update of project funding. The proposed 200 slip marina was eliminated from Phase I. Does the Applicant still plan to construct a marina? If not, how will this change impact agreements and covenants in place with Piscataquis County? With FAME? With Provident Resources Group or Barclays? Will the marina property remain with the ski resort to be turned over to the County?
- b. Development costs provided in Exhibit 4 of the Application were updated in March 2022. Cost increases ranged from 0% to 62% of the original estimates. More than half of the line items presented showed no increase at all. Is this correct?

The Applicant's lack of attention to a clear, well-written Permit Application, piecemeal approach to submittals and apparent intentional omission of details generates only instills doubt as to this Applicant's ability to successfully develop and manage a resort of this magnitude.

Sincerely,

Marcia Phillips