

November 24, 2020

Maine Department of Inland Fisheries and Wildlife 284 State Street 41 SHS Augusta, ME 04333 ATTN: Becky Orff

Dear Ms. Orff,

I am writing on behalf of Wolfe's Neck Center for Agriculture and the Environment (WNC) regarding the ongoing rulemaking by your department that will define legal noise limits for airboat operations in Maine.

The mission of WNC (*aka* Wolfe's Neck Farm Foundation) is to transform our relationship with farming and food for a healthier planet. Our programs include farmer training programs, a summer day camp, community and visitor educational programs and a burgeoning research program focused on positioning agriculture as a solution to climate change.

As the stewards of more than 600 acres of conserved land, adjacent to Wolfe Neck Woods State Park, we are the largest coastal landowner in Freeport. As a nonprofit 501c3, the organization is largely self-supported through earned income resulting from our various enterprises at Wolfe's Neck Center including our organic farming operations, well-attended community events and educational programs and our oceanfront campground, historically known as Recompence Shore Campground. Hosting an estimated 25,000 visitors annually, WNC receives nearly 50% of our earned income from our Visitor Services, including the campground, kayak and canoe rentals and our farm store.

Over the last few years, we have heard from many visitors about the negative effect the airboats had on their visit to WNC. The potential impacts on our operations and our ability to carry out our mission in support of the community, should visitation begin to drop as a result of the noise from airboats, could be disastrous.

We appreciate that you face special difficulties in crafting airboat noise rules, for which few models exist elsewhere, that balance the needs of airboat users with the concerns of coastal users, visitors and residents. WNC is hopeful that such a compromise is possible and urge you to consider the following in crafting regulations involving airboats.

- A land-based noise maximum of 70 dB(A) at 500 feet from shore. This will require airboats that travel closer to shore than 500' to do so at less than full throttle.
- A restriction on nighttime operations. All of our 120 campsites are located along the shore or within a few hundred feet of the shore. A nighttime restriction on the use of airboats between 7 p.m. and 7 a.m. would help protect the quiet enjoyment of visitors to the WNC campground and minimize impacts on wildlife and local residents.
- Institute a speed limit on airboats within 500 feet of shore as a means for limiting noise impacts. This will require operating at a lower throttle which should help keep noise limits below the aforementioned limits.
- Consideration of a suspension of airboat operations on Sundays and public holidays when recreational waterfront users are likely to be most affected.



We appreciate your efforts to develop appropriate standards for airboats that will limit their impacts on coastal communities of people and wildlife. We urge you to consider the potential disastrous impacts on our nonprofit organization as well.

Respectfully,

Dave Herring Executive Director