

Eliot 2025 Comprehensive Plan

May document changes made or suggested based on State Consistency Review or other minor editorial changes

Running list / working draft

Last modified: June 5, 2025

Plan found **consistent and complete** by Maine DACF on May 23, 2025. DACF and other reviewing agencies and organizations have **suggested changes**.

Initials: JB: Jeff Brubaker, Town Planner; CK: Claudia Kaerner, Comp Plan document graphic designer

General notes

- (1) For any comments related to the resolution of figures/maps/images, effort will be made to achieve the highest resolution possible in the final document. It may be that the version State reviewers were using was a reduced-file-size or had some other compression of images.

Page/other reference	Section name	Change	State Review suggested change?	Change made in doc?
	General	Data suggestions from attached comments: Please review the attached comments and incorporate suggestions. Some of the letters from state agencies include data items that should be very easy to incorporate.	DACF	N/A see below
	TOC	Insert page numbers into Table of Contents [JB note: CK has already done this; earlier draft hadn't yet put page #s here]	DACF	Done but need to update #s
	General	[Complete figure/table references]	DACF, DMR	
	General	[Recommend renumbering pages 1 to end of document]	DACF	Done, but address duplicate p 15s
	General	Figures and tables should be numbered – they're all "9.X" though some in Marine Resources are "11.X"	MDIFW / BwH	All figure/table numbering will

				be updated in final doc
2	Acknowledgements	Change “The content may not fully...” to “ <u>Some</u> content may not fully...”	Editorial	
3-4	Introduction	Could clarify the boundaries within which the Plan’s goals, policies, and strategies sit <ul style="list-style-type: none"> JB suggestion: no change for now, need to clarify this comment 	SMPDC	
4	Introduction	After “several Town boards and commissions, including”, add “but not limited to”	Editorial	
14	Big Ideas	Emphasis on protection of waterfront access and creation of additional access points should be afforded to inland water resources as well as marine <ul style="list-style-type: none"> JB response: for inland waters, we believe this is substantially covered by discussion of additional access to Town Forest/York Pond 	MDIFW / BwH	No change warranted
15	Pop & Demo	Eliot’s Population: Past Trends table: Remove “Source:” at the beginning of the caption	Editorial	
15	Big Ideas/Pop & Demo	There are 2 page 15s	Editorial	
15-18	Pop & Demo	Could use some more data and analysis: gender, ethnicity, senior households, and Veteran status (esp given proximity to PNSY) all can influence community needs, desires, and opportunities <ul style="list-style-type: none"> JB suggestion: Will add to appendix, no CK action needed 	SMPDC	
16	Pop & Demo	A map showing population concentration (such as dots for households) could add value, but is not required. <ul style="list-style-type: none"> JB suggestion: This is a good idea generally, but not as salient in Eliot’s context given that most of town is lower density, with a slightly denser South Eliot. No change suggested at this time. 	SMPDC	No change needed
18	Pop & Demo	Could reference analysis in Housing Chapter about what the biggest employer’s (PNSY) workforce demographics mean in terms of Eliot’s potential population changes. Population change piece is addressed in Housing Chapter on page 64 instead of here. <ul style="list-style-type: none"> JB suggestion: Add “<i>See Housing for further discussion.</i>” at the end of the “Supporting the Region’s Major Employer” 	Editorial	

		paragraph. If you need more room for text, revise the 2 nd sentence to: “However, as a bedroom community to the region’s major employer, the Portsmouth Naval Shipyard, we are planning collaboratively with Kittery, other communities, and the Shipyard to accommodate its growing workforce.”		
22	Existing LU	“Development Potential by Zone” table embedded in the map has a summation error. Asking SMPDC to correct this and also increase the table’s font size. Will send an updated hi-res map image when received	Editorial	
23	Existing LU	In Table 2.X: In the “Each additional unit” row, correct typo “acg” to “ac”	Editorial	
23	Existing LU	In Table 2.X: Remove “Source:” at the beginning of the caption	Editorial	
Agency cited p. 19	Future LU Plan	This map is very low resolution – hard to read	MDIFW / BwH	See general note (1)
Agency cited p. 19	Future LU Plan	I’ve tried finding a map of the [critical rural] overlay and have been unsuccessful – does this exist anywhere? It’d be great to see included here if possible.	MDIFW / BwH	CRO is shown in Future LU Plan – no change warranted
Agency cited p. 27	Future LU Plan	Also low resolution so a bit hard to read, but I can figure it out... just flagging in case others with worse vision may have problems reading it. The difference between growth and rural zone boundaries in the legend is indeterminable. Also curious how Eliot plans to manage critical resources given most of them exist in areas in growth, commercial, or suburban areas and not the rural areas. <ul style="list-style-type: none"> JB response: 2nd part of comment I am not sure I agree. Several resource management strategies are included throughout the plan that may be applicable to both growth and non-growth areas (e.g. wetland mitigation program, critical resource overlay district, land conservation, differential growth cap, enhanced shoreland and septic standards, etc.) 	MDIFW / BwH	See general note (1) re: resolution. No other changes warranted as we feel this is thoroughly covered in the plan already
33	Future LU Plan	This should be labeled a “Figure” instead of a “Table” at the top		
Agency cited p. 37	Future LU Plan	The critical rural area has some of the highest value natural resources in town, but really not many of them... most are more in-town, which is a bit worrisome	MDIFW / BwH	No change warranted

		<ul style="list-style-type: none"> JB response: Similar to above, disagree re: general location of highest-value natural resources. York River, York Pond, Shorey's Brook, Cutts Ridge Brook are all in Rural/Critical Rural/Transition to Critical Rural. In-town resources will/should continue to benefit from existing and plan-recommended protections, e.g. shoreland zoning, wetland mitigation, land conservation 		
37	Future LU Plan	Under the "Transition to Critical Rural" header, 1 st para, make lowercase the first "Area" in "Critical Rural Area"	Editorial	
37	Future LU Plan	2 nd para under Rural Crossroads: Replace "state legislation" with "LD 1976, discussed above"	Editorial	
39	Future LU Plan	In callout, projected future units without the Future Land Use Plan should be 15-25, instead of 15-20 – this will sync with the text on the same page	Editorial	
40	Future LU Plan	In 2 nd para under Commercial and Industrial, remove the comma from "...nearly the same, boundaries as..."	Editorial	
41	Future LU Plan	If possible, make the maps and graphs on the right a bit larger, or at least the very bottom graph (related to preferred approaches to growth). Room could be made by deleting the preface text "The Town of Eliot began the effort... <u>for more information.</u> " And perhaps shifting the green divider bar accordingly.	Editorial	
42	Future LU Plan	Can remove the "Summary of Verbal Public Comments" subheader from under Future Zone Feedback. Only 2 of the comments were verbal, the first and the last. 2-4 were written. 1 ("Consider making...") and 5 ("Encourage small...") can have a tag like, "[summary of verbal comment]"	Editorial	
45	Future LU Goal 1, Policy 2, Strategy 2	Add "Consultant" in the responsibility/partnership column	Editorial	
46	Future LU Goal 1, Policy 3	This inadvertently repeats the previous policy's text. Policy 3 should be: "Maintain the character of the rural parts of town and protect critical natural resource areas from possible negative impacts of development"	Editorial	

47	Future LU Goal 1, Policy 3 (continued)	See previous comment	Editorial	
49-67	Housing	Several figures and tables repeat the word “Figure _.” and “Table _.” at the start of their caption text, but this is not done in other sections. It seems the small-text “Figure _.” and “Table _.” instances should be deleted since other sections only have them in the header text at the top.	Editorial	
53	Housing	Community survey feedback typo: “Townhomes, cottage clusters, and mixed-use commercial residential structures” were in the <u>40</u> -45% desirability range.	Editorial	
57	Housing	3 rd full para. “See the Future Land Use Plan for a discussion...” - make underline and italics to match its formatting with other such references	Editorial	
58	Housing	Delete header “How MaineHousing Calculates Affordability Index”. This header is only for the callout on the previous page. This paragraph can continue to flow from the previous header, “Affordability Index”	Editorial	
65	Housing	1 st para under “Smaller Lot Sizes”, last sentence, delete “longstanding policy and” so the sentence reads: “This addressed a recommendation of the 2009 Plan.”	Editorial	
67	Housing	Under “Intergenerational and Accessible Housing”, replace “now usable home office space” with “ <u>no</u> usable home office space”	Editorial	
68	Housing Goal 1, Policy 1	For the cross-references, write out G,P, and S into Goal, Policy, and Strategy to be consistent with other sections. Also, the two “Land Use” goal references should be “Future Land Use”	Editorial	
68	Housing Goal 1, Policy 3, Strategy 1	Delete the period at the end of this for style consistency	Editorial	
72	Economy	Lower photo (Kittery Point Yacht Yard/Safe Harbor Marina) add photo credit: Brooklyn Gingras, SMPDC	Editorial	
72	Economy	4 th para under Our Economic History and Context, place a dash after “and there are three local businesses”	Editorial	
72	Economy	Last para, add word: “there were <u>five</u> cannabis retail operations”	Editorial	
73-90	Economy	Same as above comment in Housing: remove “Table _:” and “Figure _:” text from beginning of captions...	Editorial	

74	Economy	Community Survey Feedback: Replace “have the ability to earn a living” with “ <u>having</u> the ability to earn a living”	Editorial	
77	Economy	Last para under “Route 236”: Remove “below” from “Table _ below”	Editorial	
77	Economy	Route 236 TIF section: add words: “In early 2009, <u>the Town</u> established the Route 236 Tax Increment Financing (TIF) District.”	Editorial	
77	Economy	Table 5.X has some missing info and at least 1 typo. Update it to “ready for Adobe design” content submittal. Second row should be “Municipal sewer service” instead of “Municipal water service”	Editorial	
79	Economy	3 rd para under Eliot Village: underline/italicize “Recreation and Open Space” as a section reference	Editorial	
92	Economy	Policy 4 under Goal 2 (“Coordinate with regional economic development...”) should be Policy <u>3</u>	Editorial	
92	Economy	Goal 3, Policy 1, Strategy 2: A few spaces are needed around commas in the Responsibility/Partnership column	Editorial	
94	Ag-Forest	Under “Farms in Eliot, York County, and Maine”, make 4 th and 5 th paras quoted text, as they are direct quotes from an MFT document (“Farmland in Maine is at risk...remaining working farms”)	Editorial	
94	Ag-Forest	“Agriculture & Forest Resources Goals” should be “ <u>Agricultural</u> & Forest Resources Goals”	Editorial	
96	Ag-Forest	In open space table caption, place “Source: Town Assessor” at the end of the caption	Editorial	
97	Ag-Forest	2 nd para under “Farm and Forest Land Threatened by Development”, add “708 River Rd. (3 lots)” to the listing of approved or proposed subdivisions	Editorial	
97	Ag-Forest	In the callout, delete the two “Responded that” instances under Youth Survey Feedback; the callout flows better with the “Responded that”s removed. It can be kept for the “83% Responded That...” above (Community Survey Feedback)	Editorial	
101	Ag-Forest	Under “Community Kitchen”, underline/italicize “See Public Facilities for more on Mainspring” to keep with the style of other section references	Editorial	
103	Ag-Forest	End of 1 st para under “Town Forest Management”, remove closed parenthesis	Editorial	
103	Ag-Forest	Remove “Source:” from the beginning of the Table 6.X caption	Editorial	

107	Transportation	Capitalize “Roadway Network and Classifications” header for consistent style	Editorial	
107	Transportation	1 st para under “State Classification”, update Figure # (now says “Figure 1”)	Editorial	
107-54	Transportation	Could add map of future planning re: sidewalks, bike paths, Eastern trail <ul style="list-style-type: none"> JB suggestion: this is a great idea but would like this to be included in a future Active Transportation Plan effort (See Goal 3, Policy 3, Strategy 4) 	SMPDC	No further action needed
107-54	Transportation	Add endnote references in this section	Editorial	
108	Transportation	2 nd bullet point: Replace “that are maintained by municipalities or counties” with “, which are maintained by the Town of Eliot”.	Editorial	
117	Transportation	In Community Survey Feedback callout, remove colons from “...bicycling: (73%)” and “Public transportation: (38%)”	Editorial	
121	Transportation	In AIP Community Assessment callout, replace “Two most popular themes” with “The most popular themes”	Editorial	
122	Transportation	In Community Survey Feedback callout, change parentheses placement to: “Over half (52%) of respondents say it is very important”	Editorial	
122-23, 125	Transportation	Change references of “2021 Walk-Bike Plan” to “2021 Bike-Ped Plan”	Editorial	
124	Transportation	In photo caption, change “ACre” to “Acre”	Editorial	
127	Transportation	Remove space after “Under state law”	Editorial	
128-131	Transportation	Consider using success metrics; # of crashes, # of new sidewalk, # of new EV stations, etc.	SMPDC	Added to appendix
131	Transportation	Wildlife collisions were identified as one of the primary crash sources in Eliot, and wildlife habitat connectivity was identified as a goal elsewhere. This is one of the most important aspects for wildlife, public safety, and Eliot - it would be great to see this better addressed.	MDIFW / BwH	Added to appendix
Agency cited p. 133	Water Resources	The inventory of boat access sites could be more thorough (parking capacity, amenities, fees, etc.), including a map and indication of formal or informal access to inland waters	MDIFW / BwH	Inventory on p. 204 includes parking and amenities; map added to appendix

133-153	Rec-OS	<p>Consider mapping proposed future projects, e.g. new parks, new accessible trails</p> <ul style="list-style-type: none"> JB suggestion: A good comment generally; however, I think this type of map is best deferred to the Open Space Plan update or future efforts, as the specific locations of the proposed new park and trail extensions are yet to be determined 	SMPDC	No change needed
133-153	Rec-OS	<p>Missing a variety of information related to waterbody access</p> <ul style="list-style-type: none"> JB response: I respectfully disagree, as access to water bodies is covered extensively in the Inventory chapters and goals/policies/strategies. See, for example: pp. 133 & 135 (Boat Basin), 141-142 (Access to Water Bodies), 153 (Goal 3, Policy 1, Strategies 1-2 re: trail network and access to York Pond); Marine Resources Goal 2 (shoreline access), 203 (Boat Basin access for recreational fishing), p. 204 (table with access points along the shore), 205 (access points and facilities along the shore) 	MDIFW / BwH	
134	Rec-OS	Replace existing map with updated map (in Dropbox), "Eliot parks and open space_v2.png"	Editorial	
139-40	Rec-OS	Footnotes 3-4 numbers – at the end of the GWRLT website quotes – should be superscript	Editorial	
141	Rec-OS	<p>York Pond is the single Great Pond found in Eliot, and supports MDIFW stocking programs for brook trout. While motorboat access is restricted, listed hiking trails are insufficient for use of carry-in watercraft. Do additional water access points to York Pond exist? For example, MDIFW's lake survey/inventory suggests that carry-in access was possible from a development on Route 91 as of the last 2002 revision. Is this still the case? Existing water access to York Pond should be clarified and improved access should be a priority.</p> <ul style="list-style-type: none"> JB response: While the plan briefly cites the 2009 Plan's reference to the potential Route 91 access (p. 139), no formal, public access is known to exist from that direction. Or if so, MDIFW should have that info and know if there have been any updates since the 2002 inventory, as MDIFW owns the pond-adjacent land in that direction. This gets at the larger issue of 	MDIFW / BwH	No change warranted; may potentially be addressed further in Open Space Plan update

		access that the Comp Plan and Open Space Plan are thoroughly addressing		
141	Rec-OS	The plan makes reference to the prior 2009 plan, which "implied" the existence of public access points to the Piscataqua River. The existence of these points should be clarified, including the level of water access allowable at each location.	MDIFW / BwH	Addressed in Appendix
143	Rec-OS	In Community Center callout, remove "as discussed above" after "neighboring communities' facilities"	Editorial	
144	Rec-OS	Remove "Table ___" from small text caption of Recreational Services table	Editorial	
147-49	Rec-OS	Remove "Figure _" from small text captions	Editorial	
150	Rec-OS	Photo caption, revise to "Currently <u>there are</u> no bike paths or sidewalks in most of Eliot"	Editorial	
152	Rec-OS	Under Goal 2, Policy 3, cross-reference, spell out "Goal 1, Policy 3, Strategy 5"	Editorial	
155-167	Natural Resources	Add endnote citations	Editorial	
155-167	Natural Resources	Multiple forms of data need updating, especially fisheries information	MDIFW / BwH	Addressed in other rows in this table
155	Natural Resources	FYI that we are no longer mapping deer wintering areas in Eliot/many areas; winters are too mild to necessitate many of them. There are, however, significant vernal pools, which could be mentioned in place of these areas (they are a significant wildlife habitat, so include them with the language about inland waterfowl/wading bird habitat) <ul style="list-style-type: none"> JB suggestion: remove "deer wintering areas;" from p. 155 (2nd bullet point) 	MDIFW / BwH	
158	Natural Resources	[re: MDIFW Inventory of Rare Plants and Animals Table] Needs a better table number in the title. Also ELCODE is meaningless to readers, ditch that column. Better is to have a three part table, list animals in one part, plants next, natural communities after. List them all alphabetically by common (species) name. You can ditch the source column too. Rename Grank to Global Rank, Srank to State Rank, and add State Status as appropriate (for the plants and animals). Table 9.x, Global rank for Small	MDIFW / BwH	

		<p>Salt-marsh Aster is G5T5, and for Water Pimpernel is just G5. Global rank for Saltmarsh Sparrow is G2 (not G4) and state rank is S1B (not S3B). The table is missing Tidal marsh estuary Ecosystem, S3, GNR (global rank = GNR). It is Columbian Watermeal (not Columbia Watermeal) and Pointed Watermeal (not Pointed watermeal)... The source at the bottom of the table is incorrect. As stated in the text, the source is BWH within MDIFW, not DACF... Table 9.x, the definitions at the bottom are the old definitions. For updated definitions, see [web page]</p> <ul style="list-style-type: none"> • JB suggestions: <ul style="list-style-type: none"> ○ see updated table in Dropbox ○ Change table title to “Rare Animals, Plants, and Natural Communities in Eliot” ○ Change Source to: Beginning with Habitat, MDIFW ○ Place caption before source ○ Delete the Table Key in its entirety and replace it with a note, saying: <u>For a key to the global and state rarity ranks, see Appendix.</u> 		
159	Natural Resources	Just a heads up that we don’t encourage the use of co-occurrence data anymore – it has led to some problems and misunderstandings. I think it might still be valid to include this info since I Believe we were still actively promoting it at the time Eliot received their data but just wanted to give that important notification	MDIFW / BwH	Thank you for the qualifer about this metric; no change warranted as we believe it is still useful to Eliot
159	Natural Resources	Under “Wetland Wildlife and Fisheries Habitat”, change “waterfowl and wading bird habitat” to “inland waterfowl and wading bird habitat”. Change “tidal and wading bird habitat” to “tidal waterfowl and wading bird habitat”	Per MDIFW / BwH comment	
159	Natural Resources	The section entitled "Wetland Wildlife and Fisheries Habitat" provides essentially no discussion of existing fisheries habitat, its value to the town, or how the town plans to prioritize such habitat in future planning. Additional information should be provided, with an emphasis on protection of cold water fisheries habitat and known wild brook	MDIFW / BwH	No change warranted

		<p>trout populations. See attached memo for MDIFW inventory of known brook trout streams. Brook trout streams should also be included on any maps of critical habitats.</p> <ul style="list-style-type: none"> JB response: As noted below, fisheries habitat is extensively discussed in Water Resources and other sections; eastern brook trout is mentioned/discussed in many parts of the plan; and many policies and strategies relate to protecting or improving fisheries habitat 		
159	Natural Resources	<p>Under “Vernal Pools”, make the following changes:</p> <ul style="list-style-type: none"> 3rd sentence: “However, others are not mapped <u>because they are hard to detect</u> due to their small size (often less than an acre) and temporary emergence in the spring” 5th sentence: “Many amphibians breed in the same pond...” [remove the word “must”] 	Per MDIFW / BwH comment	
161	Natural Resources	First full paragraph in righthand column (starting with “The forested uplands surrounding...” is a block quote, should have quotes around it or indented	Editorial	
164	Natural Resources			
Agency cited pp. 159-60; presumably pertains to p. 166	Natural Resources	<p>A frequent point of confusion that folks encounter is when to use BwH maps – our maps are meant for planning purposes and not environmental review/permitting. You’re certainly welcome to use our maps to help anticipate and plan where developments could go, but just be aware that once you’re in the permitting process, you’re into environmental review and no longer BwH. Please clarify this strategy accordingly.</p> <ul style="list-style-type: none"> JB response: Development reviews may use whatever information is pertinent to the review. BwH maps could certainly inform a development review, even if caveats need to be noted. The appropriate application of environmental information to a particular development review is the purview of the local reviewing body (e.g. Planning Board). MDIFW need not try to sequester your own useful maps from local development reviews. Disclaimers on published information 	MDIFW / BwH	No change warranted to Goal 1, Policy 3, Strategy 1

		should be enough from MDIFW's perspective. Any party to a development review can challenge the validity of a particular application of environmental information during the review or in a subsequent appeal of a decision.		
168	Water Resources	The "Subwatersheds" headers should be demoted (lower level) underneath the named watershed headers (e.g. York River > Subwatersheds; Piscataqua and Salmon Falls River Watershed > Subwatersheds)	Editorial	
170-188	Water Resources	Throughout section, check to make sure "Table _" and "Figure _" small text caption references are deleted	Editorial	
171	Water Resources	1 st para, underline and italicize "Appendix"	Editorial	
171	Water Resources	In top right, italicize <i>Maine Won't Wait</i>	Editorial	
172	Water Resources	In top right table, delete the "Discussion" column (where it says [to be added] but is otherwise blank)	Editorial	
174	Water Resources	Change "Table __ below..." to "The table below..."	Editorial	
175	Water Resources	Make "Natural Resources" italicized and underlined in the lefthand column, last line, to be consistent with reference style	Editorial	
172	Water Resources	As suggested in the plan, Table 9.X "York Pond Invasive Species," largemouth bass are introduced but it is unclear to what extent they may or may not have harmed the existing fish community (i.e., acted as an "invasive" species). In fact, largemouth bass currently are one of the few principal sport fisheries present in York Pond (along with stocked brook trout). "York Pond Non-Native Species" may be a more accurate title for this table, at least from a fisheries standpoint. <ul style="list-style-type: none"> JB suggestion: Change title of table to "York Pond Non-Native Species" 	MDIFW / BwH	
177	Water Resources	Table 9.X "York River Invasive Species" lists yellow perch as a known invasive. Yellow perch are native to Maine and are not typically considered an invasive species in the southern portion of the state. <ul style="list-style-type: none"> JB suggestions: <ul style="list-style-type: none"> Remove yellow perch from table 	MDIFW / BwH	

		<ul style="list-style-type: none"> ○ In table caption, before “Source...”, add “Note: The Assessment considered yellow perch invasive but MDIFW does not (in southern Maine)”. If you need more space, consolidate the 2 paras. Under “Documented Invasive Species Problems” into 1 		
177	Water Resources	As noted for Cutts Ridge Brook (p.173), Sturgeon Creek also provides ecological value as habitat for brook trout.	MDIFW / BwH	Added to Appendix
181	Water Resources	<p>Currently, there are seven Public Water Systems (PWS) in the Town of Eliot (please see below for a screenshot of all currently active PWSs for Eliot). This includes: one Community (C) Water System, one Non-Community (NC) Water System, and five Non-Transient, Non-Community (NTNC) Water Systems. These PWSs should be included in the Comprehensive Plan...There are many emerging factors working against safe drinking water in Maine(and nation-wide) including groundwater contamination from per- and polyfluoroalkyl substances (PFAS), impacts of extreme weather events (flooding, drought, etc.), supply chain disruptions, etc. The town should continue to work with PWSs towards mitigating these factors in support of safe drinking water...The town should continue to maintain, enact, and/or amend protections for all public wellheads, groundwater, and aquifer recharge areas in the Town of Eliot. Taking proactive measures to protect Eliot’s wellheads, groundwater, and aquifers will continue to support safe drinking water now and in the future.</p> <ul style="list-style-type: none"> • JB response: Update PWS table (see Excel in Dropbox). Regarding remaining points, we agree and believe the plan addresses them 	MEDWP	
185	Water Resources	In the table, remove the extra paragraph from BMP 3.3: “...how the Town implements MCM 3”	Editorial	
191	Water Resources	Goal 3 inadvertently repeats Goal 1. Goal 3 is: “Sufficient quantity and good quality of water used by the community for drinking through the protection of current and potential drinking water sources”	Editorial	
202-203	Marine Resources	Eliot’s Comprehensive Plan is thorough and includes most of the required elements. We appreciate the focus on improving and	DMR	Info updated in main plan

		<p>maintaining water quality. However, not all of the provided license and vessel length data was included. Please add the remaining information to the plan. The data can be found here. Please include the counts of all harvester and dealer licenses for your town, as well as the counts of vessel lengths (consolidated summary tables are acceptable).</p> <ul style="list-style-type: none"> JB suggestions: <ul style="list-style-type: none"> On p. 202, 2nd para under “Shellfishing”, update the 2nd sentence to: “As of 2023, Eliot had 34 lobster/crab harvester licenses, about half of which were commercial licenses (Figure __)” On p. 203, update Fig. 11.X with updated Harvester Licenses table (in Dropbox), and update year in caption from 2020 to 2023 On p. 203, under “Commercial Fishing” header, replace first paragraph as follows: “As of 2023, Eliot had five licensed Commercial Fishing Crews, three licensed Commercial Fishing Singles, and one licensed Commercial Pelagic and Anadromous Crew (Figure _).” On p. 203, under “Recreational Fishing” header, replace first sentence with the following: “As of 2023, Eliot had 33 registrants in the Recreational Saltwater Registry and nine licensed Recreational Saltwater Fishing Operators (Figure _).” 		document and added to Appendix
194-209	Marine Resources	<p>If possible, we would like to see more discussion about the balance of commercial and recreational use on the river, and how that has changed over time. Is there enough commercial access for current and potential future demand? Has commercial fishing or aquaculture water access been lost, leading to congestion at other sites? Additionally, there has clearly been a lot of effort put into improving and maintaining water quality in the Piscataqua River and other watersheds and we hope that existing plans are implemented. Is there a need to create plans for other potential uses of the rivers as well, like a mooring management or public access plan? Regardless, the town is clearly well-</p>	DMR	Added to appendix

		positioned to continue implementing plans and improving water quality and public water access over time.		
194-209	Marine Resources	Overall, the plan is consistent with DMR's programs and policies. It is clear that the rivers are valuable to the town and we appreciate the effort that is being put in to support the working waterfront and maintain and improve water quality and public access. We noticed that the table and figure numbers were not added to the plan, although that may have been intentional. If possible, we would like to see more discussion about the balance of commercial and recreational use on the river, and how that has changed over time. Is there enough commercial access for current and potential future demand? Has commercial fishing or aquaculture water access been lost, leading to congestion at other sites? Additionally, there has clearly been a lot of effort put into improving and maintaining water quality in the Piscataqua River and other watersheds and we hope that existing plans are implemented. Is there a need to create plans for other potential uses of the rivers as well, like a mooring management or public access plan? Regardless, the town is clearly well-positioned to continue implementing plans and improving water quality and public water access over time.	DMR	Discussion on these questions has been added to the Appendix
195	Marine Resources	Add Figure reference to this map if possible	Editorial	
201	Marine Resources	Remove "Figure _" from small text caption	Editorial	
202	Marine Resources	Has the amount of commercial fishing and aquaculture changed in Eliot over the last 10 years or so? Are changes expected in the future? If so, in what direction?	DMR	Info added to Appendix
203	Marine Resources	Has the amount of recreational and commercial access changed over the last 10 years or so?	DMR	Info added to Appendix
203	Marine Resources	[see above – re: added vessel length and dealer data]	DMR	Info added to Appendix
204	Marine Resources	A map showing the locations of these access sites would be nice, but isn't required. If one exists, please include a link to it.	DMR	Added to Appendix
207-208	Marine Resources	The proposed policies and implementation strategies will do much to promote State and DMR goals. The plan is detailed, and the policies and	DMR	No change needed

		actions will help the town achieve their goals over the next several years. We appreciate the additional habitat and climate-specific goals, policies, and strategies, as well as the focus on supporting working waterfronts and water-dependent businesses in the community. We would encourage the town to reform the harbor commission, as mentioned in the marine resource goals. The town is clearly focusing on improving and maintaining water quality through a variety of approaches, all of which will benefit marine resources and the marine economy.		
208	Marine Resources	Under Goal 3, the first policy (“Help Eliot’s shoreline...”) is listed a “Policy 3”. It should be Policy 1.	Editorial	
215	Climate Change	Under “Transportation”, 2 nd para., underline and italicize <u>Transportation</u> referring to the Transportation section 3 rd para – delete “-- at the time of this writing, not yet installed –” Italicize <i>Maine Won’t Wait</i>	Editorial	
216	Climate Change	Under “HVAC at Town Hall”, replace “The equipment will be reinstalled in the renovated Town Hall” with “The renovated Town Hall will have energy-efficient HVAC.”		
217	Climate Change	StreamSmart crossing designs (as noted elsewhere in the plan) should be included as a strategy to provide resilience to climate change for both tidal and inland waters <ul style="list-style-type: none"> JB response: Stream Smart principles are already tied to climate change resilience in Transportation Goal 5, Policy 3, Strategy 2 	MDIFW	No change warranted
219	Climate Change	In table, place the “Source:” info at the end of the caption In photo caption, capitalize “Boat Basin”	Editorial	
220	Climate Change	Generally a decent discussion, though should include information on Sea Level Rise and Tidal Marsh Migration. These resources should be included on page 220... <ul style="list-style-type: none"> JB response: yes, this is discussed on p. 214. This is also covered further in the 	MDIFW / BwH	No change warranted
224-28	Historic-Arch	Delete “Table_” and “Figure_” from small text captions	Editorial	

227	Historic-Arch	Italicize and underline <u>Appendix</u> in first para.	Editorial	
229	Historic-Arch	In callout, remove “the” before “Eliot” from “instrumental in the incorporation of the Eliot”	Editorial	
240-50	Public Facilities	Delete “Table_” and “Figure_” from small text captions	Editorial	
257-67	Fiscal Capacity	Delete “Table_” and “Figure_” from small text captions	Editorial	
261	Fiscal Capacity	Italicize/underline <u>Transportation</u> in the first para. (section reference)	Editorial	
No page	Water Resources	The plan indicates that protecting natural resources is a priority and guiding principle of future town land use, but only addresses limited fisheries habitat protection issues. More emphasis should be placed on the importance of inland fisheries habitat as a natural resource. Wild brook trout are present in Eliot and represent a species of special conservation importance in Maine. Multiple streams in Eliot have been inventoried by MDIFW with some flowing waters supporting wild brook trout; a list of these waters has been attached at the end of these comments and should be part of an inventory of important natural resources. The York River and York Pond are also stocked with hatchery-raised brook trout, representing a significant investment of state resources (see included list of stocked waters for details). Additional protection should be considered to protect these waters and other important natural resources when reviewing proposed development projects. Brook trout habitat is particularly vulnerable to a host of land-based activities, which often lead to a concurrent loss of riparian habitat. We typically request 100-foot undisturbed buffers along both sides of any stream, including stream-associated wetlands. Buffers should be measured from the upland wetland edge of stream-associated wetlands; if the natural vegetation has been previously altered then restoration may be warranted ¹ . Protection of riparian areas diminishes erosion/sedimentation problems, reduces thermal impacts, maintains water quality, and supplies leaf litter/woody debris (energy and habitat) for the system. Protection of these important riparian functions ensures that the overall health of the stream habitat is maintained. In addition, smaller headwater and lower order streams are often affected the greatest by development and these systems benefit the most from adequately sized, vegetated buffers.	MDIFW	No change warranted

		<p>Based on MDIFW surveys around the region, many road maintenance and construction projects also often inadvertently impede passage at stream crossings. The Town should consistently adopt stream-crossing practices (i.e., culvert installation/maintenance) which do not impede fish passage as required by the Natural Resources Protection Act². Refer to guidelines attached to this document. In addition, the Army Corps of Engineers has adopted regulations regarding stream crossings that potentially affect municipal road maintenance programs. Maine Audubon, along with many local and federal partners, has also developed a “Stream Smart” design methodology for road crossings built according to high standards of aquatic organism passage. Such a methodology may be of use to the Town in future development projects.</p> <ul style="list-style-type: none"> • JB response: we agree with the importance of these resource protections and feel the plan already addresses them (e.g. Stream Smart Crossings, boosting shoreland zoning beyond DEP minimums, land conservation). The attached recommendations (riparian stream buffers, etc.) could certainly inform implementation of the plan, e.g. when the Town implements the shoreland zoning upgrade 		
No page	Water Resources	<p>There is a public need to provide safe angler access to all Town waters that support recreational and commercial fisheries, as well as other recreational uses. The Town plan should adopt language that reflects State and MDIFW goals^{3,4,5} and access development should be consistent with those goals. For example, public access to public waters must not be limited to Town residents only, as such action would jeopardize existing MDIFW stocking and management programs⁶ and is inconsistent with MDIFW and State public access goals.</p> <p>Based on this review, few formal boat access sites to inland waters exist within the Town. The Town should ensure that consideration of future public access development includes inland waters as well as marine.</p>	MDIFW	No change warranted

		<p>For any freshwater public access sites present, more information should be provided. The town plan should identify and describe the status of public access to all freshwater within the Town's boundaries, including more detailed enumeration of parking capacity, facilities, and type of boat launch present, if applicable. Eliot encompasses or borders only one Great Pond, York Pond. As such, priority should be given to ensuring reasonable and perpetual public access to this water body...</p> <ul style="list-style-type: none"> JB response: As noted elsewhere, public water access is discussed in multiple parts of the plan. This includes extensive discussion of access improvements to the Town Forest at York Pond. Access is also discussed further in Goal 3 of the Open Space Plan Update 		
No page	Rec-OS	<p>...the Town should be sure that such areas are open to and can accommodate use by all Maine citizens and not just Town residents.</p> <ul style="list-style-type: none"> JB response: Agreed, and Eliot parks and open space are not restricted to just Eliot residents. 	MDIFW	No change warranted
No page	Natural Resources	<p>The plan provides limited discussion of habitats and values for inland waters within the Town of Eliot. More attention should be paid to wild brook trout habitat in particular, including promotion of protections that would allow them to flourish...</p> <ul style="list-style-type: none"> JB response: This plan addresses the importance of brook trout in several ways. It notes trout in York Pond (p. 171) and the stocking MDIFW did in the York River (173). It notes Cutts Ridge Brook as a habitat for wild eastern brook trout (& Wild & Scenic tributary) (37) and recommends improving the associated culvert (173). It recommends including the brook in the Critical Rural Overlay (FLUP). It notes that brook trout are an SCGN priority 3 (174). It mentions climate change impacts to brook trout (203). It notes the importance of riparian habitat (155). Recommendations such as increasing shoreland zoning protections, land conservation, and wetland protections are just some that are pertinent to improving brook trout habitat. 	MDIFW	No change warranted

Additional Info

To address State Consistency Review suggestions and supplement the plan sections

Population & Demographics

Additional Census data

SMPDC comment: “Could use some more data and analysis: gender, ethnicity, senior households, and Veteran status (esp given proximity to PNSY) all can influence community needs, desires, and opportunities.”

Data: Veteran Status, Eliot

Characteristic	Veterans		Nonveterans	
	Number	Percent	Number	Percent
Civilian population 18 years and over	509	9.5	4869	90.5
PERIOD OF SERVICE				
Gulf War (9/2001 or later) veterans	91	17.9	(X)	(X)
Gulf War (8/1990 to 8/2001) veterans	55	10.8	(X)	(X)
Vietnam era veterans	179	35.2	(X)	(X)
Korean War veterans	52	10.2	(X)	(X)
World War II veterans	26	5.1	(X)	(X)
SEX				
Male	477	93.7	2217	45.5
Female	32	6.3	2652	54.5
AGE				
18 to 34 years	49	9.6	890	18.3
35 to 54 years	60	11.8	1479	30.4
55 to 64 years	132	25.9	1178	24.2
65 to 74 years	76	14.9	960	19.7
75 years and over	192	37.7	362	7.4
POVERTY STATUS IN THE PAST 12 MONTHS				
Civilian population 18 years and over for whom poverty status is determined	509	(X)	4869	(X)
Income in the past 12 months below poverty level	25	4.9	150	3.1
Income in the past 12 months at or above poverty level	484	95.1	4719	96.9
DISABILITY STATUS				
Civilian population 18 years and over for whom poverty status is determined	509	(X)	4869	(X)
With any disability	179	35.2	557	11.4
Without a disability	330	64.8	4312	88.6

Source: ACS 5-Year Estimates, 2020 Table S2101

Data: Veteran Status, USA (for comparison)		
Civilian population 18 years and over		7.1
PERIOD OF SERVICE		
Gulf War (9/2001 or later) veterans		20.6
Gulf War (8/1990 to 8/2001) veterans		21.4
Vietnam era veterans		35.2
Korean War veterans		7.6
World War II veterans		2.9
SEX		
Male		90.9
Female		9.1

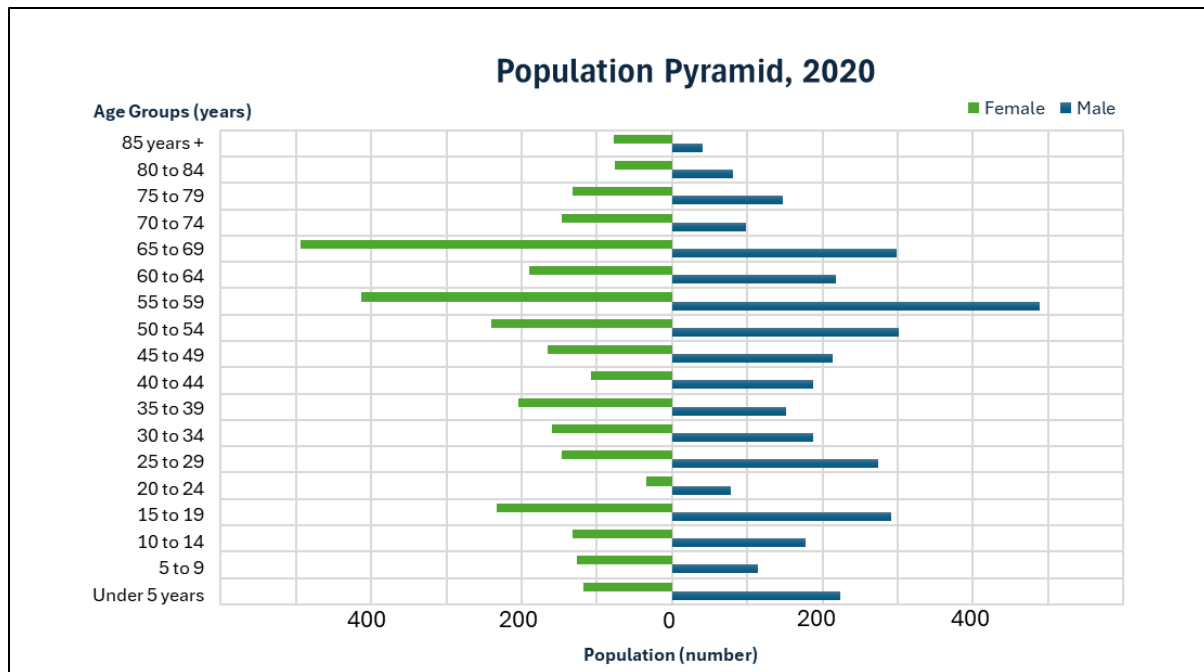
VETERAN STATUS, 2020
9.5 percent of Eliot's total population
35.2 percent of Vets are Vietnam-era Vets
37.7 percent of Vets are aged 75 years or older
93.7 percent of Vets are male
Veterans in Eliot are more likely than non-Vets to have a disability or to have an income below poverty level

Takeaway: With a greater proportion of the population that are veterans, compared to the US, we should consider how the strategies articulated in this plan can be carried out with veterans in mind, e.g. through housing opportunities and accessibility improvements.

Data: Gender and Age, Eliot			
Age	Male	Female	
Under 5 years	224	118	
5 to 9 years	114	127	
10 to 14 years	177	132	
15 to 19 years	292	233	
20 to 24 years	78	34	
25 to 29 years	274	146	
30 to 34 years	188	160	
35 to 39 years	151	204	
40 to 44 years	188	108	
45 to 49 years	213	165	
50 to 54 years	301	240	
55 to 59 years	489	413	
60 to 64 years	218	190	
65 to 69 years	298	494	
70 to 74 years	98	146	
75 to 79 years	147	132	
80 to 84 years	81	76	
85 years and over	40	78	
Source: ACS 5-Year Estimates, 2020 Table S0101			
Other info taken from Table SO101 by line for Population Characteristics Table.			

POPULATION	2010		2020		CHANGE
Characteristics	#	%	#	%	#
Female	2,923	47	3,512	50	589
Age: 65 +	424	15	926	29	502
Age: under 18	438	15	512	16	74
Male	3,297	53	3,466	50	169
Age: 65 +	300	9	664	19	364
Age: under 18	900	27	748	21	(152)

Number and percentage of population traits by gender, 2010 and 2020. Source: U.S. Census



Takeaway: Reinforces the need to carry out the goals, policies, and strategies in this plan in a way that responds to all age groups but keeps aging-in-place and needs for older adults as a central focus. There are more age 65+ women than men in Eliot.

Data: Race, Eliot	2020		2010	
Label	Estimate	Percent	Estimate	Percent
Race alone or in combination with one or more other races				
Total population	6767	100	6220	100
White	6607	97.6	6073	97.6
Black or African American	99	1.5	136	2.2
American Indian and Alaska Native	0	0	56	0.9
Asian	122	1.8	79	1.3
Native Hawaiian and Other Pacific Islander	0	0	0	0
Some other race	90	1.3	8	0.1
HISPANIC OR LATINO AND RACE				
Total population	6767	100	6220	100
Hispanic or Latino (of any race)	352	5.2	42	0.7
Mexican	247	3.7	0	0
Puerto Rican	0	0	0	0
Cuban	0	0	0	0
Other Hispanic or Latino	105	1.6	42	0.7
Not Hispanic or Latino	6415	94.8	6178	99.3
White alone	6201	91.6	5947	95.6
Black or African American alone	36	0.5	42	0.7
American Indian and Alaska Native alone	0	0	16	0.3
Asian alone	30	0.4	79	1.3
Native Hawaiian and Other Pacific Islander alone	0	0	0	0
Some other race alone	29	0.4	0	0
Two or more races	119	1.8	94	1.5
Two races including Some other race	27	0.4	0	0
Two races excluding Some other race, and Three or more races	92	1.4	94	1.5
Source: ACS 5-Year Estimates, 2010, 2020 Table DP05				

RACIAL OR ETHNIC BACKGROUND		2010		2020		CHANGE
Population		#	%	#	%	#
White		6,073	97.6	6,607	97.6	534
Black or African American		136	2.2	99	1.5	-37
American Indian and Alaska Native		56	0.9	0	0	-56
Asian		79	1.3	122	1.8	43
Native Hawaiian and Other Pacific Islander		0	0	0	0	0
Some other race		8	0.1	90	1.3	82
Hispanic or Latino (of any race)		42	0.7	352	5.2	310

Number and percentage of population by racial or ethnic background, 2010 and 2020. Source: U.S. Census

Transportation

Success metrics

SMPDC comment: “Consider using success metrics; # of crashes, # of new sidewalk, # of new EV stations, etc.”

These are aspirational metrics

- **Transportation Goal 2: Zero traffic crashes that are fatal or cause a severe injury**
 - Seek to reduce roadway fatalities to 0 (from 1 in the 2015-24 period)
 - Seek to reduce severe injury crashes from about 2-3 per year. This may take time, for example, going to 1-2 per year in the next 10 years as safety improvements are made, and then further reductions in the 10+ year timeframe
- **Goal 3, Policy 3, Strategies 1-2 regarding expanding active transportation improvements:**
 - Within 10 years, build at least 1.5 miles of new sidewalk and at least 5 directional miles of shoulders
 - State-Beech Active Transportation Project: 0.9 miles of sidewalk, 1.6 miles of new shoulders
 - Moses Gerrish Farmer Rd./Main St.: about 1.0 miles of sidewalk from State Rd. to Greenwood St.
 - Old Rd.: about 0.4 miles of sidewalk from the Library to Frost-Tufts Park
 - Additional shoulder recommendations are in the 2021 Bike-Ped Plan
- **Goal 4, Policy 1, Strategy 3 regarding EV charging stations**
 - At least 1 cost-neutral (or better) charging station at a municipal/public facility within the plan horizon

Wildlife crossings

MDIFW comment: “Wildlife collisions were identified as one of the primary crash sources in Eliot, and wildlife habitat connectivity was identified as a goal elsewhere. This is one of the most important aspects for wildlife, public safety, and Eliot - it would be great to see this better addressed.”

In 2021, a MaineDOT culvert replacement project on Route 236 near Marshwood Middle School improved a critical wildlife crossing spot. As a DOT preconstruction news release stated, the project “will improve drainage and allow safe movement of the Blanding’s turtle

an endangered species that has recently experienced a high mortality rate on this section of road”.

Source: <https://www.maine.gov/dot/news/route-236-road-work-eliot-aimed-helping-endangered-species>

Going forward, the Town can improve conditions for wildlife crossings of roads by implementing several strategies in the plan:

- **Transportation Goal 5, Policy 3, Strategy 2**
 - Work with applicable state agencies and other stakeholder organizations to make transportation facilities more resilient to the impacts of climate change and severe weather, such as prioritizing, designing, and building roadway stream crossing upgrades with Stream Smart principles and implementing applicable recommendations of the Climate Vulnerability Assessment
- **Natural Resources Goal 1, Policy 1, Strategies 1-3**
 - Prioritize stream crossings to be improved or reconstructed to remove barriers for fish and other wildlife passage. Include this prioritization in the Town’s Capital Improvements Program (CIP)
 - Implement at least one improvement project from the priority list within this plan’s horizon. Seek funding, partnerships, and opportunities to bundle more than one crossing in the same project or to include a crossing improvement in a larger transportation project
 - Endorse the Stream Smart Crossings principles to guide future Town projects or changes to land use regulations
- **Future Land Use Goal 1, Policy 3, Strategy 3**
 - Create Critical Resource overlay districts that have additional protections for critical natural resources and wildlife habitat, informed by Beginning with Habitat data, Focus Areas of Statewide Ecological Significance, and other environmental information. These overlay districts should include provisions to prevent, minimize, mitigate, or compensate for disturbance to large unfragmented habitat blocks or wildlife corridors

Recreation and Open Space

Possible access points along the Piscataqua River

MDIFW comment: “The plan makes reference to the prior 2009 plan, which “implied” the existence of public access points to the Piscataqua River. The existence of these points should be clarified, including the level of water access allowable at each location.”

What the Recreation and Open Space section says:

The 2009 Plan also mentioned several streets that end at the Piscataqua River, implying that they may provide limited access to the water: Woodbine Ave., Grover Ave., Park St., and Dixon Ave., though it noted that for Woodbine Ave., “an in-depth title search needs to be done to determine available usage”.

This plan offers no new information with regard to the above four potential access points. As noted, property and title research could provide a definitive answer. None of the four points appear to have a clear physical public access, such as a boat ramp. They all have adjacent private pier systems.

This plan’s intent was simply to convey pertinent information from the 2009 Plan. Looking into these potential access questions further is not believed to be a priority for the community, as of this writing, though it certainly could be done in the future for one or more of these points, if that is of interest to the community or the neighborhoods where they are located.

Natural Resources

Key to Animal, Plant, and Natural Community Rarity Ranks

Copied and pasted from the Maine Natural Areas Program web page here:

<https://www.maine.gov/dacf/mnap/features/rank.htm>

Rank	Definition
G1	Globally Critically Imperiled – At very high risk of extinction (species) or collapse (ecosystem) due to very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors.
G2	Globally Imperiled – At high risk of extinction (species) or collapse (ecosystem) due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
G3	Vulnerable Globally – At moderate risk of extinction (species) or collapse (ecosystem) due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
G4	Apparently Secure Globally – At fairly low risk of extinction (species) or collapse (ecosystem) due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
G5	Secure Globally – At very low risk of extinction (species) or collapse (ecosystem) due to a very extensive range, abundant populations or occurrences, and little to no concern from declines or threats.
GH	Possibly Extinct/Collapsed Globally – Possibly Extinct (species) or Possibly Collapsed (ecosystem) - Known from only historical occurrences but still some hope of rediscovery. Examples of evidence include (1) that a species has not been documented in approximately 20-40 years in human-dominated landscapes despite some searching and/or some evidence of significant habitat loss or degradation; (2) that a species or ecosystem has been searched for unsuccessfully, but not thoroughly enough to presume that it is extinct or collapsed throughout its range.
GX	Presumed Extinct/Collapsed Globally – Presumed Extinct (species) - Not located despite intensive searches and virtually no likelihood of rediscovery. Presumed

Rank	Definition
	Collapsed (ecosystem) - Collapsed throughout range, due to loss of key dominant and characteristic taxa and/or elimination of the sites and ecological processes on which the type depends.
S#S# / G#G#	Range Rank – A numeric range rank (e.g., S2S3 or S1S3) is used to indicate any range of uncertainty about the status of the species or ecosystem.
S1	Critically Imperiled in Maine – At very high risk of extirpation in the jurisdiction due to very restricted range, very few populations or occurrences, very steep declines, severe threats, or other factors.
S2	Imperiled in Maine – At high risk of extirpation in the jurisdiction due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
S3	Vulnerable in Maine – At moderate risk of extirpation in the jurisdiction due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
S4	Apparently Secure in Maine – At a fairly low risk of extirpation in the jurisdiction due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
S5 / G5	Secure in Maine – At very low or no risk of extirpation in the jurisdiction due to a very extensive range, abundant populations or occurrences, with little to no concern from declines or threats.
SH	Possibly Extirpated in Maine – Known from only historical records but still some hope of rediscovery. There is evidence that the species or ecosystem may no longer be present in the jurisdiction, but not enough to state this with certainty. Examples of such evidence include (1) that a species has not been documented in approximately 20-40 years in human-dominated landscapes despite some searching and/or some evidence of significant habitat loss or degradation; (2) that a species or ecosystem has been searched for unsuccessfully, but not thoroughly enough to presume that it is no longer present in the jurisdiction.

Rank	Definition
SNA / GNA	Not Applicable – A conservation status rank is not applicable because the species or ecosystem is not a suitable target for conservation activities (e.g., non-native species or ecosystems).
SNR / GNR	Unranked – llobal or subnational conservation status not yet assessed
SU / GU	Unrankable – Currently unrankable due to lack of information or due to substantially conflicting information about status or trends.
SX	Presumed Extirpated in Maine – Species or ecosystem is believed to be extirpated from the jurisdiction (i.e., nation, or state/province). Not located despite intensive searches of historical sites and other appropriate habitat, and virtually no likelihood that it will be rediscovered.

Qualifier	Definition
S#? / G#?	Inexact Numeric Rank – Denotes inexact numeric rank.
Q	Questionable taxonomy that may reduce conservation priority – Distinctiveness of this entity as a taxon or ecosystem type at the current level is questionable. The "Q" modifier is only used at the global level.
T#	Infraspecific Taxon (trinomial) – The status of infraspecific taxa (subspecies or varieties) are indicated by a "T-rank" following the species' global rank.

Water Resources

Sturgeon Creek and brook trout

The Water Resources section notes the importance of Cutts Ridge Brook for brook trout. Per an MDIFW comment, it should be noted that Sturgeon Creek also provides ecological value for brook trout.

Water quality classifications

Excerpts from DEP 2021 Triennial Review

<https://www.maine.gov/dep/water/wqs/2021%20Triennial%20Review%20Recommendations.pdf>

Designated Uses and Criteria for Maine River and Stream Classifications

Note: See [38 M.R.S. Article 4-A Section 464](#) Classification of Maine waters and [38 M.R.S. Article 4-A Section 465](#) Standards for classification of fresh surface waters for complete text. Federal water quality standards for Maine can be found at [40 CFR Section 131.43](#).

Class	Designated Uses*	Dissolved Oxygen Numeric Criteria	Bacteria (<i>E. coli</i>) Numeric Criteria	Habitat Narrative Criteria	Aquatic Life (Biological) Narrative Criteria**
Class AA	Habitat for fish and other aquatic life Drinking water after disinfection Fishing* Agriculture Recreation in/on the water Navigation	As naturally occurs	As naturally occurs but may not exceed geometric mean of 64 CFU/100 ml over 90-day interval or 236 CFU/100 ml in more than 10% of samples in any 90-day interval	Free flowing and natural	No direct discharge of pollutants***; as naturally occurs**
Class A	Habitat for fish and other aquatic life Drinking water after disinfection Fishing* Agriculture Recreation in/on the water Navigation Hydropower unless prohibited by 12 M.R.S. Section 403 Industrial process/cooling water	7 ppm or 75% saturation From 10/1 to 5/14, 7-day mean concentration not less than 9.5 ppm and 1-day minimum concentration not less than 8.0 ppm in identified fish spawning areas	As naturally occurs but may not exceed geometric mean of 64 CFU/100 ml over 90-day interval or 236 CFU/100 ml in more than 10% of samples in any 90-day interval	Natural	As naturally occurs**
Class B	Habitat for fish and other aquatic life Drinking water after treatment Fishing* Agriculture Recreation in/on the water Navigation Hydropower unless prohibited by 12 M.R.S. Section 403 Industrial process/cooling water	7 ppm or 75% saturation From 10/1 to 5/14, 7-day mean concentration not less than 9.5 ppm and 1-day minimum concentration not less than 8.0 ppm in identified fish spawning areas	May not exceed geometric mean of 64 CFU/100 ml over 90-day interval or 236 CFU/100 ml in more than 10% of samples in any 90-day interval from 4/15 to 10/31	Unimpaired	Discharges may not cause adverse impact to aquatic life in that the receiving waters must be of sufficient quality to support all indigenous aquatic species without detrimental changes to the resident biological community.**
Class C	Habitat for fish and other aquatic life Drinking water after treatment Fishing* Agriculture Recreation in/on the water Navigation Hydropower unless prohibited by 12 M.R.S. Section 403 Industrial process/cooling water	5 ppm or 60% saturation but must maintain WQ sufficient for spawning in identified fish spawning areas 6.5 ppm (monthly average) at 22° and 24°C	May not exceed geometric mean of 100 CFU/100 ml over 90-day interval or 236 CFU/100 ml in more than 10% of samples in any 90-day interval from 4/15 to 10/31	Habitat for fish and other aquatic life	Discharges may cause some changes to aquatic life, but the receiving waters must be of sufficient quality to support all species of indigenous fish and maintain the structure and function of the resident biological community.**

* [38 M.R.S. Article 4-A Sections 466, 10-A and 466-A](#) establish a sustenance fishing use as a subcategory of the applicable Fishing designated use. The sustenance fishing subcategory is applicable to certain waters as specified in [38 M.R.S. Article 4-A Sections 467 and 468](#).

** Numeric biocriteria in Maine rule [Chapter 579](#), Classification Attainment Evaluation Using Biological Criteria for Rivers and Streams.

*** Limited exceptions apply.

Designated Uses and Criteria for Maine Lake and Pond Classification

Note: See [38 M.R.S. Article 4-A Section 464](#) Classification of Maine waters and [38 M.R.S. Article 4-A Section 465-A](#) Standards for classification of lakes and ponds for complete text.

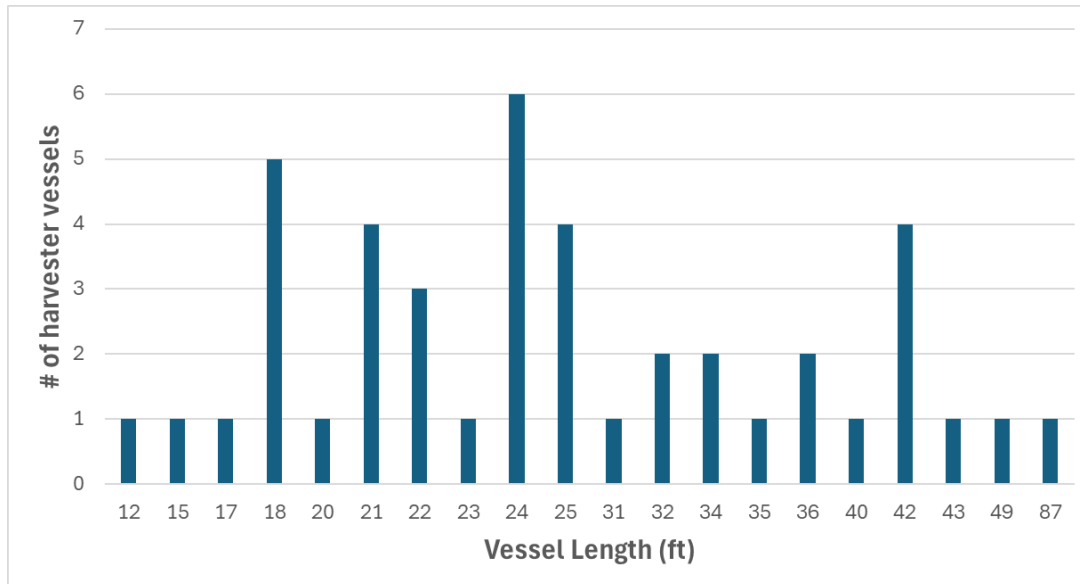
Class	Designated Uses*	Bacteria (<i>E. coli</i>) Numeric Criteria	Habitat Narrative Criteria	Aquatic Life (Biological) Narrative Criteria
Class GPA	Habitat for fish and other aquatic life Drinking water after disinfection Fishing* Agriculture Recreation in/on the water Navigation Hydropower Industrial process/cooling water	May not exceed geometric mean of 29 CFU/100 ml over 90-day interval or 194 CFU/100 ml in more than 10% of samples in any 90-day interval	Natural	No direct discharge of pollutants**; as naturally occurs Stable or improving trophic state Free from culturally induced algal blooms Shoreline and watershed activities must not cause trophic degradation

* [38 M.R.S. Article 4-A Sections 466.10-A](#) and [466-A](#) establish a sustenance fishing use as a subcategory of the applicable Fishing designated use. The sustenance fishing subcategory is applicable to certain waters as specified in [38 M.R.S. Article 4-A Sections 465-A](#) and [467](#).

** Limited exceptions apply.

Marine Resources

Fishing/harvester vessels licensed in Eliot by length of vessel



Type	Total
Aquaculture (AL)	1
Commercial Fishing Crew (CFC)	5
Commercial Fishing Single (CFS)	3
Commercial Pelagic and Anadromous Crew (CPC)	1
Commercial Pelagic and Anadromous Single (CPS)	1
Commercial Shellfish (CS)	5
Lobster/Crab Class 1 (LC1)	2
Lobster/Crab Class 2 (LC2)	7
Lobster/Crab Class 2 +70 (LC2O)	3
Lobster/Crab Class 3 (LC3)	4
Lobster/Crab Class 3 +70 (LC3O)	1
Lobster/Crab Non Commercial (LNC)	15
Lobster/Crab student (LCS)	2
Menhaden Non Commercial (MENR)	1
Recreational Saltwater Fishing Operator (SWRO)	9
Recreational Saltwater Registry (SWR)	33
Vibrio Harvester (VH)	5
Grand total	98

2023 data. Source: MaineDMR

Dealer licenses in Eliot

Dealer type	Total
Retail Seafood (R)	1
Seaweed Buyer (SWB)	1
Shellstock Shipper (SS)	1
Vibrio Dealer (VD)	1
Wholesale no lobster (W)	1
Wholesale with lobster (WL)	1
Grand Total	6

2023 data. Source: MaineDMR

Additional discussion of commercial access to the Piscataqua River

Excerpt from DMR comment: “Overall, the plan is consistent with DMR’s programs and policies. It is clear that the rivers are valuable to the town and we appreciate the effort that is being put in to support the working waterfront and maintain and improve water quality and public access. We noticed that the table and figure numbers were not added to the plan, although that may have been intentional. If possible, we would like to see more discussion about the balance of commercial and recreational use on the river, and how that has changed over time. Is there enough commercial access for current and potential future demand? Has commercial fishing or aquaculture water access been lost, leading to congestion at other sites? Additionally, there has clearly been a lot of effort put into improving and maintaining water quality in the Piscataqua River and other watersheds and we hope that existing plans are implemented. Is there a need to create plans for other potential uses of the rivers as well, like a mooring management or public access plan? Regardless, the town is clearly well-positioned to continue implementing plans and improving water quality and public water access over time.”

Responses

Note that table and figure numbers will be finalized in the final plan document.

Is there enough commercial access for current and potential future demand?

We do not believe that there will be a shortage of commercial vessel access to the water within the plan horizon. The Eliot Boat Basin provides a reliable public access point for commercial and recreational boats. Season passes are available for boat owners to avoid having to pay a single-day boat launch fee every time they access the water. Improvements recommended in this plan could make boat launching even more efficient, e.g. an automated fee payment system.

Private marinas and boatyards such as Safe Harbor Marina (formerly Kittery Point Yacht Yard), Long Reach Landing, and Great Cove Boat Club, provide additional access point for authorized vessels.

Moorings can be applied for online. Mooring fees for commercial vessels are a fixed fee of \$200.

Has commercial fishing or aquaculture water access been lost, leading to congestion at other sites?

No significant losses of commercial fishing or aquaculture water access has occurred since at least 2009, when the last Comprehensive Plan was adopted. The accesses mentioned above have existed for decades. Congestion is not known to be an issue at the Boat Basin.

Spinney Creek continues to be a site for commercial aquaculture, as discussed in the Marine Resources section.

Is there a need to create plans for other potential uses of the rivers as well, like a mooring management or public access plan?

Such plans may be warranted within this plan's horizon. Creating those types of plans would appear to be consistent with the following Marine Resources strategies:

- **Goal 1, Policy 1, Strategy 2:** Support implementation of local and regional harbor and bay management plans, including, but not necessarily limited to, recommendations of the Piscataqua Region Estuaries Partnership (PREP)
- **Goal 2, Policy 2, Strategy 1:** Identify needs for additional recreational and commercial access (which includes parking, boat launches, docking space, fish piers, and swimming access), for example, Spinney Creek access from Main Street for small craft

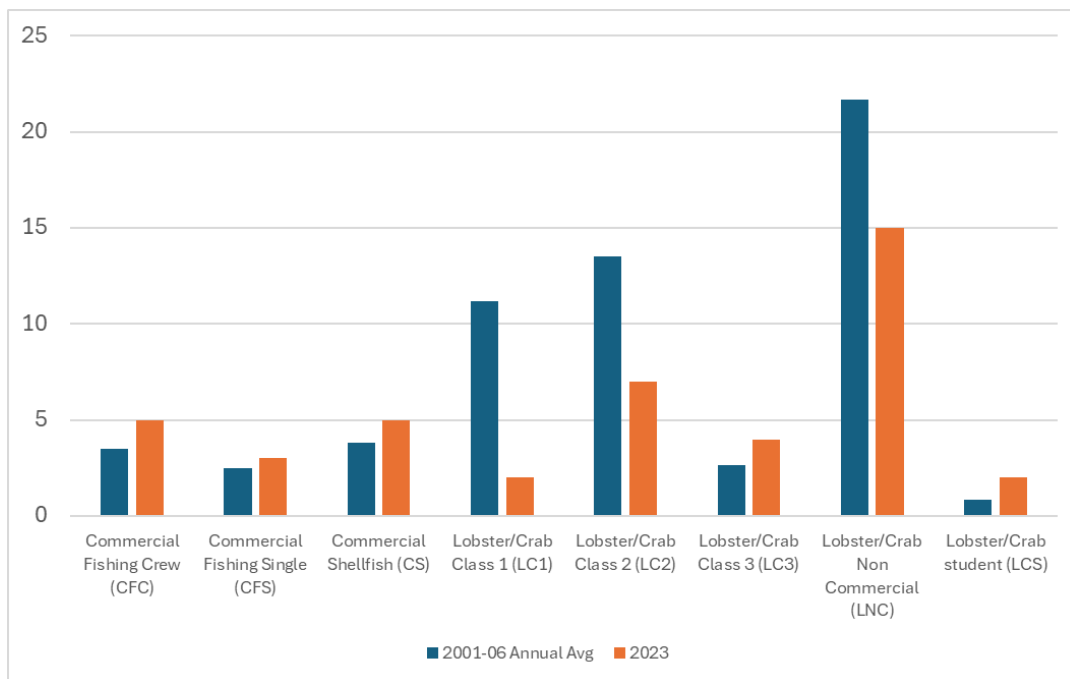
- **Goal 2, Policy 2, Strategy 2:** Provide sufficient funding for and staffing of the Harbormaster, and consider reinstituting the Harbor Commission

Change over time of commercial fishing and aquaculture

DMR comment: “Has the amount of commercial fishing and aquaculture changed in Eliot over the last 10 years or so? Are changes expected in the future? If so, in what direction?”

The numbers point to a possible decline in commercial shellfishing over the last quarter century. As shown in the table below, Lobster/Crab Class 1, Class 2, and Non-Commercial license numbers are lower in 2023 than the annual average for 2001-06. Data for those years was reported in the 2009 Comprehensive Plan. Commercial fishing licenses are slightly higher in 2023.

The table below only compares license types that are named the same between 2001-06 and 2023.



Aquaculture in Eliot has not changed much in the last decade or so. Spinney Creek Shellfish has been running an aquaculture operation in Spinney Creek since 1983, when its name was Spinney Creek Oyster Co.

On the distribution side, Atlantic Aqua Farms operates a shellfish distribution facility on Route 236. In 2021, another wholesale seafood business vacated their facilities just off of Route 236 and leased them to a cannabis company.

It is not clear how commercial fishing and aquaculture overall will change in the future. Spinney Creek Shellfish has the only DMR Aquaculture Lease (PISC-SC) in Eliot, growing both oysters and quahogs. In 2023 they applied to DMR for a lease expansion from their existing 2.75 acre lease to 3.44 acres, stating that the lease expansion would provide a buffer for gear drift and allow them “to grow a maximum of 1.5 million oysters, up from 1 million that was granted in [their] original lease”. This would be achieved by adding 100 additional cages. DMR approved the lease on February 10, 2025. This suggests there will be a short-term increase in aquaculture in Eliot. It is not known what other aquaculture sites in Eliot’s waters could be developed in the future.

Source: MaineDMR Pending Lease Applications and Aquaculture Lease Decisions web pages, available via: <https://www.maine.gov/dmr/aquaculture/maine-aquaculture-leases-and-lpas/aquaculture-leases-and-lpas>

Change over time of recreational and commercial access

DMR comment: “Has the amount of recreational and commercial access changed over the last 10 years or so?”

See above.

Map of access points and facilities along the shore



Historic and Archaeological Resources

Additional archaeological note regarding a conservation area

In its project report on the new (2025) Kashmer Farm conservation easement, Great Works Regional Land Trust (GWRLT) reports: “There are signs of long and frequent use of the property by Native Americans, and artifacts have been found on the site, some as old as 4,500 years.”

Source: <https://yorkrivermaine.org/wp-content/uploads/2025/05/GWRLT-Final-Report-and-Attachments-May-2025.pdf>