

February 22, 2021

**VIA ELECTRONIC MAIL ONLY**

Peter Nesin, Chair  
City of Belfast Zoning Board of Appeals  
City Hall  
131 Church Street  
Belfast, ME 04915

RE: Nordic Responses to Upstream Appeal of Planning Board Permits for the Nordic Project and Standing Brief

Dear Chair Nesin and Zoning Board of Appeals Members:

Attached to this email are Nordic's briefs responding to the issues Upstream raised in its appeal of the five permits the Planning Board issued for the Nordic Project. We also include a legal brief documenting Upstream's failure to establish standing as necessary for the Zoning Board of Appeals to proceed with review of Upstream's appeal.

Please note that, in order to avoid perpetuating contamination of this appeal record, Nordic's substantive replies do not address the new evidence Upstream submitted and to which Nordic promptly objected. Should the Zoning Board of Appeals decline to strike that evidence, Nordic respectfully requests the opportunity to rebut it.

Thank you for your consideration.

Sincerely,

*/s/ Joanna B. Tourangeau*

Joanna B. Tourangeau

CC: Kate Grossman, Esq.  
William Kelly, Esq.  
Wayne Marshall, Director, Belfast Planning and Codes Division  
David Losee, Esq.