



Natural Resources Council of Maine

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Comments on the Draft Management Plan for the St. John Uplands Region
Submitted by Cathy Johnson, Forests and Wildlife Program Director
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General comments:

- The plan makes no mention of climate change or how the Bureau of Parks and Lands (BPL) will adapt its management to address the climate crisis. Will BPL decrease its harvest levels over the next decade from its current “business as usual” levels to increase carbon sequestration and storage? Will BPL explore opportunities to participate in carbon credit programs? We urge BPL to commit to specific actions to address the climate crisis in this plan.
- No areas in the entire region, arguably the most remote part of the North Woods, have been designated non-mechanized backcountry. BPL should seek opportunities to designate areas for non-mechanized backcountry recreation. If areas adjacent to the Allagash Wilderness Waterway (AWW) are not added to the Waterway as required by 12 MRS §1877 (see below), those areas should be designated non-mechanized backcountry to enhance the natural resources and the recreational experience in the AWW.

Lands bordering the AWW (Telos; Chamberlain; Round Pond; T15R11; T14R11):

- 12 MRS §1877 states that “Any land acquired that is adjacent to the waterway becomes part of the waterway.” The purpose of this law was to provide an avenue to further enhance the wilderness character and protection of the natural resources of the AWW. There is no time limit on this law. With the exception of a few original public lots, the vast majority of the land in the Telos, Chamberlain, and Round Pond Units was acquired after the creation of the AWW and, pursuant to 12 MRS §1877, should be added to the AWW.
- In the event that the State fails to add the lands mentioned above to the AWW as required by law, the Bureau should, at the very least, provide further protection for the one-mile zone. This could be accomplished by adding the portion of those Units within the one-mile zone to the AWW. This additional protection could help address the climate crisis by ending harvesting on those lands. It would protect the wilderness recreation experience and setting. It would protect more wildlife habitat and travel corridors. It would avoid noise pollution from nearby harvesting and road travel. It would more fully protect the designated visible areas on public lands. And it would be consistent with the State’s responsibility to “develop the maximum wilderness character” of the AWW. Alternatively, if the lands within the one-mile zone are not added to the AWW, they should be designated as non-motorized backcountry areas.
- Gates should be installed on all roads at the point at which they enter the one-mile zone to protect the AWW wilderness experience.
- The plan should define the “busiest canoeing season” specifically as May 1 – October 15.

Telos Unit

- New boat launch: NRCM does not support any new road building, or extending or improving any existing roads, closer to Webster Lake, and we do not support creating a new boat launch (either trailered or hand carry) on Webster Lake. Webster Lake is one of a very few remote lakes of this size that remain relatively inaccessible. There are many lakes in the North Woods where boaters and anglers can access the water with either a trailered or hand carry launch. Webster Lake is currently accessible to boaters and anglers by way of the portage trail from Telos Lake, which is accessible by vehicle. This access ensures that the remote experience of Webster Lake, including the portion that is within Baxter State Park, remains. Making vehicle and boating access to Webster Lake easier would negatively impact this remote section of Baxter State Park. Paddlers paddling Webster Stream have other portages – the one from Telos to Webster is not a factor limiting Webster Stream use.
- Trailer storage: We agree with the superintendent of the AWW that the uses currently taking place at the Kellogg Brook site should not be shifted to the Chamberlain Bridge parking lot. Given that camping is limited to two weeks, trailers should be removed from the area for the remainder of the year, not moved closer to the AWW. Creating a trailer storage area within the AWW is inconsistent with the AWW's legal mandate to "develop its maximum wilderness character."

Round Pond Unit

- Southeast portion of Round Pond: NRCM supports maintaining the gate at its current location in order to "maintain non-motorized access for users seeking that type of experience." Backcountry hunters have very few places to hunt that are distant from vehicles; this area provides the opportunity for that type of experience. In addition, moving the gate closer to the fire tower trail would also degrade the remote hiking experience for AWW paddlers who choose to hike to the fire tower. This type of easy day-use access would lead to increased use of a character that is different from the use by those who are in the middle of a multi-day wilderness trip. Providing road access that close to the trail would also invite conflict with campers on Round Pond. BPL should be supporting the AWW's mandate to "develop the maximum wilderness character," not degrading it.

Chamberlain Unit

- Indian Stream access: BPL should retain the gate on the Lock Dam Road at its current location at Indian Stream. Moving it west 1000 feet along the Lock Dam Road as proposed would degrade the wilderness experience for paddlers. In addition, we agree with BPL staff that it would require construction of an additional parking area less than ¼ mile from Eagle Lake, and it would attract illegal campers causing sanitation and maintenance problems, all of which would degrade the AWW.
- Trail to Locomotives: The recently built trail to the locomotives has resulted in significantly increased day use/walk-in access to the shore of Eagle Lake, which has degraded the wilderness character of the AWW. Groups of 100 have been reported. Paddlers have reported a significant

degradation of the wilderness paddling experience when encountering large groups of day users at the locomotives. NRCM urges the Bureau to discontinue the trail or negotiate with the abutting landowner to move the trail head out to the point where the access road enters the one-mile zone (where the gate used to be).

- The Boot and Pump Handle: Given their exemplary natural resources, recreational value, and visibility from the watercourse, the Boot and Pump Handle parcels should remain unregulated and not harvested, and therefore not allocated to Timber Management as a secondary allocation. These are areas that should be provided greater permanent protection through designation as ecological reserves or non-motorized backcountry areas.

Allagash Southeast Unit

- High Conservation Value Area: Given its designation as a High Conservation Value Area, its status as a potential ecological reserve, and its numerous rare plants, the plan should clarify that no timber harvesting will take place on the portion of the parcel that is between Rt. 161 and the St. John River.
- Hemlock stand: The portion of the unit that includes the northwestern-most stand with a significant component of hemlock should be designated a special protection area.

Thank you for the opportunity to comment.