



December 31, 2013

Jim Vogel
Department of Agriculture, Conservation and Forestry
Division of Parks and Public Lands
22 State House Station
Augusta, ME 04333-0022

RE: Five Year Review of the 2007 Flagstaff Management Plan

Dear Jim:

Thank you for the opportunity to submit comments on the Five Year Review of the 2007 Flagstaff Management Plan (the "Plan") related to issues addressed at the December 11, 2013 Advisory Committee meeting. The Natural Resources Council of Maine (NRCM) has several comments that we would like the Bureau to consider as it moves forward with its review of the Plan.

Bigelow Preserve

1. The Plan calls for execution of a lease for the **Wing Camp**. NRCM questions whether any public benefit is derived from continuing to pursue a lease when the leasee has not been cooperative for some time and when the camp is in disrepair. We believe that it is a better use of Bureau resources to abandon efforts to rectify the lease. However, we also understand that there may be extenuating legal circumstances that may bind the Bureau's actions. If this is the case, NRCM recommends that such circumstances be presented to the Advisory Committee so that the Committee may weigh in the Bureau's next steps.
2. The Carrabassett Region Chapter of the New England Mountain Bike Association has requested **mountain bike access to several existing trails within the Bigelow Preserve**. NRCM believes that mountain biking can be a compatible use within the Preserve, so long as it does not result in overdevelopment, is not near sensitive natural areas, and does not unduly interfere with other recreational pursuits. We will address each trail proposal individually:
 - We **support** mountain bike use on the "**Dead Moose Trail**" because a management road is already in existence, so long as the Bureau examines potential culvert and drainage repairs.
 - NRCM is **concerned** about the proposal to reroute the existing "**Esker Trail**" to allow for use as a haul route over the next few years. We question whether it is a good use of Bureau resources to **temporality** reroute a trail (instead of temporarily closing it), which would could result in two disturbed areas once hauling is done.
 - We **support** the Bureau's alternative recommendation for the "**Birthday Hill**" trail. The Bureau's recommendation to allow mountain bike use on the nearby management road/snowmobile trail is a good idea because it promotes mountain bike touring instead of the intensive use that the proposed "Birthday Hill" trail would have generated.
 - NRCM **does not support** the "Backside Trail" proposal, due to concerns about overdevelopment of the northern half of the Bigelow Preserve.

Flagstaff Lake

3. At the December 11, 2013 Advisory Committee meeting, the Bureau presented **two potential new boat launch sites for the east end of Flagstaff Lake**. NRCM does not support either potential site and does not support the addition of any additional trailered boat launches on Flagstaff Lake. It is the experience of NRCM staff that Flagstaff has little motorized boat traffic, the majority of which is limited to the west end of the lake where there are five trailered launches. We believe that retaining the current level and type of use is in keeping with the undeveloped character of the Bigelow Preserve. The Bigelow Preserve Plan allows for “essential service facilities”, which are basic facilities needed to service a resource area and to control and enhance public use, the location and design of which should be consistent with the objective of protecting the overall natural character of the Preserve. Hand carry launches are more than sufficient to enhance public use and they preserve natural character by the retaining the integrity of the shoreline. Furthermore, each potential boat launch would require a change in allocation to “Developed Recreation”. Changing the allocation of parts of the Flagstaff shoreline would significantly jeopardize the undeveloped character of the Preserve.

Redington Township Lot

4. NRCM does not support a **new crossing of the Appalachian Trail** on the Redington Township Lot. The Redington Lot is very remote. Further development of motorized vehicle trails would **retract** from the lot's remoteness. While NRCM has not officially weighed in on any effort to establish a National Wildlife Refuge in the area, we are interested in the idea and would not like to see any development (such as a motorized vehicle crossing of the AT) that would jeopardize such a designation. Furthermore, NRCM does not believe that motorized crossings are compatible with the quiet recreation opportunities often unique to the Appalachian Trail corridor.

General: Applies to All Lands

5. NRCM believes that potential **increased timber harvesting** on public lands is inconsistent with the Plan. We believe that increased timber harvesting would put unnecessary pressure on old growth component and late-successional forest. Bureau policy calls for retention of old growth component “at similar proportions in the residual stand as it occurred pre-harvest.” (Pg. 57 of the Plan.) The Bigelow Preserve is estimated to have from 30 to 35% in late-successional stands. It is Bureau policy to increase the amount of late-successional forest. (Pg. 57 of the Plan.) Increased harvesting would strain Bureau resources making it difficult for the Bureau to follow the Plan, which calls for careful selection harvest of hardwoods in the Bigelow Preserve. (Pg. 56 of the Plan.) Selection harvest requires substantial manpower, which would be stretched if the Bureau were to increase its harvest. Increased harvesting represents a substantial change in policy and should receive more detailed oversight from the Advisory Committee. NRCM requests that any proposal to increase harvest levels over what was planned when the Plan was adopted be presented in specific detail to the Advisory Committee for review and comment prior to any harvesting or related activities.

Thank you again for your consideration. If you have any questions, please do not hesitate to contact us.

Sincerely,



Eliza Donoghue, Esq.
North Woods Advocate & Outreach Coordinator

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