



Natural Resources Council of Maine
3 Wade Street • Augusta, Maine • 04330 • www.nrcm.org

Aug. 16, 2019

James Vogel
Senior Planner, Bureau of Parks and Lands
22 State House Station
Augusta, Maine 04333-0022

By email

Re: NRCM's comments on the draft Management Plan for Gulf Hagas-Whitecap

Dear Jim,

Thank you for the opportunity to comment on the draft Management Plan for the Gulf Hagas/Whitecap fee and easement lands.

This fee parcel and the adjacent easement are wonderful additions to the State's public lands system. As the draft plan notes, these parcels are adjacent to Gulf Hagas, a National Natural Landmark, and the Appalachian Trail (AT), and are within the 100 Mile Wilderness, the wildest section of the entire 2181-mile AT. As such, the area is a recreational resource deserving the highest level of protection.

In addition, the West Branch of the Pleasant River is a high-value brook trout fishery and focus area for the restoration of the federally endangered Atlantic salmon. In addition, as the plan notes, the parcel includes 200 acres of wetlands including a 30-acre portion of an exemplary silver maple floodplain forest identified by the Maine Natural Areas Program as a rare and exemplary botanical feature. These ecological features also deserve the highest level of protection.

On the other hand, the timber resources on the unit have been heavily harvested prior to acquisition by the Bureau, and, as the plan notes, unlikely to be harvested in the 10-year time frame of the plan.

Given all these factors, **NRCM strongly urges the Bureau to designate as the Dominant Resource Allocation virtually the entire unit as Backcountry Non-motorized Recreation.** This dominant resource allocation is the allocation best suited to provide the full range of protections for both the recreation and ecological resources described above.

The need to keep the KI Road and the three-quarters of a mile of the Hermitage Road open for vehicular use could be achieved, as proposed in the plan, by allocating those corridors to Developed Recreation Class 1.

And, to ensure the highest level of protection for the riparian corridors and the fisheries and wildlife they protect, a Wildlife allocation as a secondary allocation could be overlaid on those riparian corridors on all allocations on the parcel.

Our only other comment is a drafting comment. On p. 3 of the plan, there is reference to the “third” component of the project. It is unclear what the first two components are. We urge you to clarify that in future drafts.

Thank you again for the opportunity to comment on this draft.

Sincerely,

A handwritten signature in cursive script that reads "Cathy".

Catherine B. Johnson, Esq.
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