



February 10, 2021

Re: Final Management Plan for the St. John Uplands Region

Dear Jim,

On behalf of the Natural Resources Council of Maine (NRCM), I appreciate the opportunity to provide additional comments on the St. John Uplands Region Management Plan. Thank you for responding to our comments on the draft plan. I noticed that the final management plan includes a few changes in response to our comments, such as: The new section on how the Bureau of Parks and Lands (BPL) is addressing climate change, continuing consideration of options for RV/trailer storage at the Kellogg Brook site, and assurances that there will be no timber harvesting in the hemlock stand upslope of Route 161.

Overall, we are supportive of the wide use of wildlife management area allocations in the final plan, particularly because this is one of the most ecologically significant areas in Maine and hosts two significant deer wintering areas. Since special protection zones are proposed in the final plan – the most protective resource allocation, as you mentioned – and the secondary resource allocation in many of the wildlife management areas is remote recreation, we are satisfied with the balance BPL struck between timber management, resource protection, and recreation.

However, we remain concerned with a couple aspects of the plan, including adding trailered boat access at Webster Lake. We urge you to abandon the proposal to create additional access to this water body and instead maintain carry-in access only. Allowing motorboats on the lake, even with limits on engine horsepower, will not adequately preserve the scenic and remote character of the undeveloped shoreline or prevent aquatic invasive species introduction. We strongly urge BPL to work in close coordination with Baxter State Park on management decisions at Webster Lake, with the goal of not adding motorboats.

We also remain concerned with plans to increase ease of access to the Allagash Mountain fire tower and locomotives, specifically because the citizen-approved bond to purchase the Allagash Wilderness Waterway (AWW) requires that the state seek to “develop the maximum wilderness character” of the AWW. We believe plans to continue and expand access at the locomotives and the fire tower, respectively, would deplete the wilderness character of the AWW by increasing the number of people that may be present at these sites during several months out of the year. While we certainly support public access to public lands, we also strongly support efforts to protect the maximum wilderness character of the AWW. The AWW is the state’s only wild and scenic river and there are few remaining places like the Allagash in the entire Eastern United States. As such, extra effort must be made to conserve the AWW’s natural resources and habitat and to prevent the slow chipping away of the AWW’s wilderness character by incrementally easing restrictions. While we understand BPL is working to balance public access with resource protection and management, we believe the gate regulating access to the fire tower should remain where it is and that access to the locomotives by land should be discontinued. While we understand that there is no data documenting the level of walk in/day use, we are aware of several firsthand accounts from people traveling the waterway suggesting that there have

been so many people congregated at the trains that it degrades the experience for paddlers. I hope that you'll take into account the impacts that decisions made on all units of the St. John Uplands management area will have on the neighboring, state managed AWW.

We greatly appreciate the careful attention you have given to this management plan. In a region like the Upper St. John, where a sense of remoteness and intact habitats remain, we encourage you to think beyond the scope of these management units and consider the unique role this region plays in a world with so few locations left that have its distinguishing attributes. Thank you for accepting my comments, and please let me know if you have questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Melanie Sturm". The signature is written in black ink and is positioned below the "Respectfully submitted," text.

Melanie Sturm  
Forests and Wildlife Director