



STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
BUREAU OF PARKS AND LANDS
22 STATE HOUSE STATION
AUGUSTA, MAINE 04333

JANET T. MILLS
GOVERNOR

AMANDA E. BEAL
COMMISSIONER

Date: April 23, 2021

To: Western Mountains Region Management Plan Advisory Committee Members
From: Maine Department of Agriculture, Conservation and Forestry, Bureau of Parks and Lands
Re: 2nd Five-Year Review and Update of the Western Mountain Region Management Plan

Enclosed are the Advisory Committee and other public comments on the 2021 Five-Year Review of the 2011 Western Mountains Region Management Plan, covering the period of 2016-2020, and the responses to those comments by the Bureau of Parks and Lands. This memo and the enclosure will serve as the Final Report on the Five-Year Review.

The Bureau emailed its 2021 Five-Year report for the Western Mountains Region Plan to the Advisory Committee on January 25, 2021, requesting comments on the report. The Bureau did not identify any new issues or circumstances that were not addressed in the Plan. However, the report informed the committee of ATV trail development on the Sandy River Plt. portion of the Four Ponds Unit (and abutting private forest land), as allowed by Plan Amendment A adopted as a result of the 2016 Five-Year Review. The committee was also informed that no ATV trail development has yet taken place on the Richardson Unit in the vicinity of the Richardson Twp./Rangeley Plt. line, as allowed by Plan Amendment B, also adopted in 2016.

The Bureau received written comments on the Five-Year report from seven committee members and three other members of the public and takes particular note of the following:

- Mahoosuc Unit Timber Management Recommendations: Peter Johnson of Seven Islands Land Company provided several comments related to timber management and offered silvicultural recommendations. Many of the comments related to details of timber management that are not typically included in the Bureau's management plans, which address broad forestry goals; more detailed stand-specific recommendations are addressed in forest prescription documents prepared for planned harvests. Nonetheless, the Bureau has provided preliminary responses to the comments and suggestions, and welcomes further conversation on these topics, if desired, to cover in more detail the topic of timber management on the Mahoosuc Unit and in the region.
- Protection of Brook Trout Habitat and Stream Smart Tools: Jeff Stern of the Androscoggin River Watershed Council (ARWC) commented on a number of aspects of water quality protection -- and protection of brook trout streams in particular -- and posed questions on the Bureau's use of stream barrier data and Stream Smart tools. Here also, many of the

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comments related to management practices applied during timber harvesting and during road construction and decommissioning (including at stream crossings) that are at a level of operational detail not typically included in the Bureau's management plans. Once again, the Bureau has provided preliminary responses to the comments and suggestions, which touch on the Bureau's long-standing practices to protect stream quality with the application of Best Management Practices (BMPs) and current and expanding collection of stream barrier data and use of Stream Smart tools. The Bureau would be glad to meet with ARWC to share information and discuss implementation of management activities that serve the Bureau's goal of continued improvement in protecting water quality in streams and in reducing stream barriers.

- Reports of Unauthorized ATV/Snowmobile Use at Four Ponds Unit or Vicinity: ARWC commented on reports they had received of damage caused by ATVs creating their own trails into the headwaters of the Swift River, associated with hobby gold panning activity in the vicinity of the Four Ponds Unit. It is not clear whether the reports pertain the public lands or abutting private forest land; there are no authorized ATV trails on the Four Ponds Unit other than the trail across the Sandy River Plt. parcel, which is not in the Swift River watershed.

Shelby Rosseau of Rangeley Lake Heritage Trust also commented on continued unauthorized use of snowmobiles and ATVs on both RLHT and the NPS lands, stemming from trails illegally cut several years ago, and which they believe may be associated with riding on the Four Ponds Unit and with campowners on the Unit.

In both cases, the Bureau is interested in whatever information the commenters may have on specific problem locations, and is willing to conduct field visits to further investigate the issues. The Bureau's ORV program will follow up with ARWC and RLHT regarding these concerns and possible BPL responses.

- Degradation of Shoreline and Riparian Vegetation in Vicinity of Shoreline Campsites on Richardson Lake: Noah Pollock of the Northern Forest Canoe Trail organization commented on reports that NFCT has received of these shoreline impacts. It is not clear whether the reports pertain to the dozen shoreline campsites on BPL fee property within the Richardson Unit, or the more numerous sites that are not on BPL property. However, the Bureau would welcome a field visit to the BPL campsites with NFCT to assess conditions and discuss what actions, if any, might be necessary to address observed problems (potentially with the assistance of NFCT).

The Bureau would also like to inform the committee that Rangeley Lake Heritage Trust and other groups submitted a request in mid-March to construct several mountain bike trail loops across the Dallas Plt. South Lot, with a desire to begin trail layout this spring. The Bureau is considering the request and is open to a field visit to examine the proposed routes, but it would be premature to make a further commitment at this point. If the Bureau decides to move forward with the request, a proposal will need to be introduced to the advisory committee for consideration, as the first step in a public process to amend the management plan.

This completes the Five-Year Review process.

Enclosure:

Advisory Committee and Other Comments on the 2021 Five-Year Review and Bureau Responses

**Summary of Advisory Committee Comments and BPL Responses
on the Western Mountains Region Management Plan 5-Year Review for 2021**

Comment Period January 25, 2021 – February 15, 2021

Comment	Response
From: Peter Johnson, Seven Island Land Company	
<p><u>Timber Management Recommendations</u></p> <ul style="list-style-type: none"> • The forest management and silvicultural recommendations in this plan rely heavily on various blanket species “pecking orders”; for example, favor yellow birch over sugar maple and spruce over fir as well as regeneration dynamics. Successful forest management is achieved by capturing losses in value as suggested by the forest’s dynamics. A State forestry plan should be heavily influenced by forest health dynamics and mortality and decay patterns as observed on the ground. For example: <ul style="list-style-type: none"> ○ favor spruce over fir because the forest is experiencing losses in the fir due to windthrow, over maturity, red rot, or spruce budworm; ○ thin even-aged spruce stands from below to capture losses in value caused by forest competition; ○ remove overmature intolerants from mixed stands because the overmature veneer quality white birch and poplar are succumbing to dieback and decay; ○ harvest unhealthy pine where needle decline is observed; ○ salvage blowdowns from windfall events; ○ identify and prioritize sugar maple decline pockets and salvage them; ○ and generally as rule identify where and what type of trees should be harvested based on natural dynamic’s caused by competition, insects, diseases, windstorms, etc. <p>I do like the beech, extended rotation and legacy tree retention suggestions.</p> <p>Previously thinned spruce and pine stands could also be converted to uneven-aged stands starting with small group selections. There seems to be a focus on removing overstories merely based on the presence of regeneration and less on the overstory health and vigor.</p> <ul style="list-style-type: none"> • Dauerwald or continuous regeneration “approach” is used with discretion in some European countries. It is an approach where common sense and the observation of key forest health and vigor dynamics are 	<ul style="list-style-type: none"> • The Bureau appreciates the insights and suggestions contained in the comments. Some of the forest health dynamics described are at a level of detail that are not typically included in our regional management plans. The Regional Plans address broad forestry goals while the detailed stand-by-stand conditions and recommendations are described in the prescription documents. However, the factors mentioned are taken into account by foresters when preparing prescriptions, as informed by field observations, and with the input and review of the Chief of Silviculture. • The foresters continually work to limit the proportion of fir on Bureau-managed forests, a challenge as that species regenerates aggressively in shade or sun. Fir can often be reduced through early commercial thinnings of spruce-fir and spruce-fir/hardwood stands. • The great majority of Bureau regeneration harvests are selection or irregular (extended removal) shelterwood, aimed at producing and maintaining stands with both vertical and horizontal diversity. As a forest manager not tied to a mill, the Bureau manages to produce high-quality products, typically sawlogs and veneer, with many acres being of late successional character.

<p>employed by experienced foresters. It abandons conventions based simply on metrics such as the concepts of exact age-class distribution, diameters, cutting cycle and rotation. Individual tree removal is based on financial maturity more so in hardwood or patterns of decline in forest individual tree health for all species groups based on competition, insects, diseases, weather patterns or other natural disturbance events. Regeneration does not drive the system but establishes itself continuously as short cutting intervals allow for frequent but very light harvesting. Individual trees, as long as they continue to remain healthy, are allowed to grow beyond conventional size targets or age limits. Mast and snag /legacy tree retention is present. Ideal for multi-cohort stand structures.</p> <p><u>Outcome-Based Forestry</u> OBF should be used as an insurance policy on State lands where biological or ecological conditions suggest that separation standards be exceeded. OBF for example, if it is being used as an “efficiency” tool will only lead to its demise by the Legislature.</p> <p><u>Aquatic Organism Passage</u> I didn’t see any mention of installing AOP (Aquatic organism passages) in place of failed or upgraded stream crossings as road projects might suggest.</p>	<ul style="list-style-type: none"> • OBF has been used in only to a limited extent on a trial basis and we do not anticipate widespread application of the approach. • Larger stream crossings (typically requiring a culvert larger than 3’) are most often done with open bottom structures such as bridges or box culverts which allow AOP. Stream crossings using culverts employ the following AOP related specifications written in our road maintenance contracts: <ul style="list-style-type: none"> ○ Bedding: Culverts used at stream crossings shall be placed with the inlet and outlet slightly below the stream bed. ○ Pitch: The culvert shall be pitched to the slope of the natural stream bottom. The culvert outlet should be below the low water level to prevent a “hanging” culvert.
<p>From: Elizabeth Thorndike, IF&W, Assistant Regional Biologist, Region D Sarah Spencer, IF&W, Biologist assigned to BPL</p>	
<p>Elizabeth Thorndike Four Ponds Unit <u>Gate at Long Pond:</u> The gate at Long Pond in Four Ponds, is that a Department gate? I’m curious because we plan to conduct research in the upcoming years on the Arctic charr population and it would make a significant difference to have the ability to drive gear to the water.</p>	<ul style="list-style-type: none"> • There are no gates on BPL property at Four Ponds, and no public access roads. The Western Region can assist with planning for the best means to transport gear to Long Pond.

<p><u>Beaver Mountain Lake:</u> The listed ongoing work at the Beaver Mountain Lake boat launch, is there any next steps planned I should be aware of or could assist with?</p> <p>Richardson Unit <u>Upper Dam Gates:</u> Is there a place on line to check the status of Upper Dam gate? I see the plan says closed during mud season, is that a specific date or is that depending on the year and conditions when the gate opens and closes?</p>	<ul style="list-style-type: none"> • The Boating Facilities Program completed a review of the boat launching availability over the winter of 2010-2011. At that time, it was determined that the Bureau does not own assured public recreational motor vehicle access to the public lands parcel on the pond. The owner of a private lot that would be crossed has advised the Bureau that they would not permit public access to a boating facility. Several private parcels were up for sale at the time; however, LUPC zoning around most of the lake does not allow public trailerable boat launches. • There is no online reporting of the status of the gates; this information can best be obtained by contacting the Western Region office. Gate 1 is opened as soon as road conditions allow, the date of which will vary from year to year. Gate 2 has been removed.
<p><i>From: Mac Dudley, Rangeley Lake Snowmobile Club</i></p>	
<p><u>Observations of Increased Use and Related Suggestions for Management</u> ...last year and now this year, more people are participating in various forms of outdoor recreation likely due to the pandemic. As a hiking trail maintainer for the USFS and AMC, I have seen a major increase of people on the trails and over crowding in trail head parking areas.</p> <p>My casual observations during the ATV season and now the snowmobile season is that both were or are now very busy. I believe that we may need to reassess current levels of maintenance for recreational trails, parking, boat launches and access locations people use to fish or swim.</p> <p>Over the summer, I also noticed that what I will term "new" users lacked knowledge or lacked respect for whatever they were using for recreation. Trash was rare in the past and now much more common. Campfires where prohibited, walking off trail or onto sensitive areas all seem to be significantly increased. So, in addition to maintenance issues, user education may need to be enhanced.</p> <p>Finally, we may need to revise long term contingency plans and establish more formal monitoring, reporting and follow-up inspections of the recreational resources in the region.</p>	<ul style="list-style-type: none"> • The Bureau appreciates the observations. They correspond to similar observations during 2020 at many locations across the lands managed by BPL. • The Bureau will give consideration to increased maintenance in response to increased use levels, as informed by staff observations and as resources may allow. • The Bureau appreciates the observation and the suggestion for enhanced visitor education. BPL staff have relatively few opportunities for contact with recreation visitors, when in-person user education might occur. However, educational messages are disseminated using signage and various print and electronic media, and Bureau staff regularly work to enhance these messages and materials. • Western Region staff will continue to monitor the use and condition of recreation resources in the plan area, and will report to the Regional Manager concerns as they arise.

From: Jeff Stern, Androscoggin River Watershed Council

Brook Trout Conservation/Stream Connectivity

Western Maine boasts the largest remaining native population of Eastern Brook Trout in the United States...there is strong correlation between the Western Mountains Region and the best remaining brook trout habitat, according to the Eastern Brook Trout Joint Venture.

The science of utilizing “stream smart” planning in order to improve stream connectivity is rapidly evolving. Stream smart includes measures such as ensuring that stream crossings are 1.2 times the bankfull width of a stream, and other protective measures. The original plan for the Western Mountains was adopted in 2010 at a time when stream smart planning was in its infancy.

Our reading of the...Second Five-Year Review found no mention of streams throughout the document when timber harvesting was discussed on the various BP&L units. This is a serious omission, in light of the importance of protecting and enhancing brook trout habitat throughout the region as summarized above. Are stream crossings for current logging, and other road uses, wide enough? When logging roads are put to bed are stream smart principles being employed?

Page 5 of the review references the Integrated Resource Policy (IRP). We looked at the IRP. Not only is it too general when discussing aquatic habitat management, it was adopted in 2000 (amended in 2007). The IRP is seriously out of date.

Given all of the above, ARWC strongly believes that Brook Trout Conservation/Stream Connectivity should be considered to be a “new issue” that warrants a formal amendment to the plan. We understand this will require public meetings and a public comment period, eventually leading to an amendment to the plan.’

- Water quality and stream connectivity is considered during all road construction and maintenance activities conducted on Bureau managed lands. Our foresters are made aware of Stream Smart and other current best management practices through yearly training. Beginning in 2020, Bureau foresters developed and began to apply a new water quality BMP planning template that includes peer review and monitoring processes. The Bureau also completed a two-day BMP training session that resulted in Maine DEP certification for erosion control practices for all foresters. Additional training in 2021 includes an introduction to the stream smart data base as well as water quality oriented grader training for our staff and contractors.
- The Plan notes the presence of brook trout streams on the Mahoosuc Unit and other units covered by the plan. It should be noted that the Plan is not a plan of operations (see page 1 of the Plan) and is not intended to convey the details of all aspects of management, but rather provides broad management direction. Therefore, stream protection practices employed as part of the Bureau’s timber management and during timber harvesting are not discussed. The Review table lists only the management recommendations from the plan, none of which specifically address protection of streams. However, BMPs for water quality protection are employed in all road work, and with any new construction updated standards are applied.
- The Bureau is currently in the planning stages for an update of the IRP. The Bureau also applies Wildlife Management Guidelines drafted by IF&W for the purposes of stream protection; those guidelines are being updated by IF&W.
- The Bureau does not regard this to be a “new issue” but would be glad to meet with ARWC to share information and discuss implementation of management activities. Management of the Western Mountains Region public lands has throughout the life of the current plan and before included protection of brook trout streams. One aspect of this is the application of riparian buffers

	<p>with a Wildlife “dominant resource allocation,” as described in the plan. BPL cooperates with IF&W in applying those buffers and otherwise protecting brook trout streams, and incorporates a range of best management practices in the course of timber management and road management.</p>
<p><u>Ecological Reserves</u> These are important areas to preserve and protect. We are most familiar with the ecological reserve on the Mahoosuc Unit. ARWC believes that all efforts should be made to keep motorized vehicles and equipment out of these areas.</p> <p>The monitoring interval of ecological reserves is confusing (page 16). On one hand the review says MNAP conducted a natural resource inventory on the Mahoosuc Ecological Reserve in 2009. Then, in bold in the right-hand column, it states MNAP re-sampled 30 long term monitoring plots in 2018, with the next inventory scheduled for 2028. We would like to know where these 30 plots are located and what, specifically, MNAP is monitoring.</p> <p>Further, did MNAP conduct a re-inventory on the Mahoosuc ER in 2018? The review is not clear about this. ARWC believes monitoring should be conducted at least every 5 years, preferably more often as funding allows.</p>	<ul style="list-style-type: none"> • Bureau policy, as described in the IRP, prohibits new motorized trails in ecological reserves except under certain limited conditions, and prohibits timber harvesting. • A natural resource inventory was prepared in 2009 detailing significant botanical features identified within the unit, including the Ecological Reserve. A goal of MNAP is to survey significant botanical features, including rare plant occurrences and exemplary natural communities at a minimum of every 20 years. With volunteer efforts, including the New England Wildflower Society’s Plant Conservation Volunteers Program, some sites are revisited more frequently. • The Maine Natural Areas Program conducts a statistically valid continuing forest inventory across Maine’s ecological reserves. Plots are based on the Forest Inventory and Analysis Protocol of the United States Forest Service, and plots are resampled on a 10 year interval. Baseline sampling of randomly located forest inventory plots occurred at Mahoosucs ER in 2008, and the first resampling occurred in 2018. The second resampling is scheduled for 2028. Information on monitoring locations and methodology is presented in the Ecological Reserves Monitoring Plan (2003) and several monitoring reports, available on the MNAP website. Additional details on these topics specific to the Mahoosucs ER are available from MNAP.
<p><u>Transportation</u> ARWC appreciates the work of BP&L to block off roads that branch off the Sunday River Road in the Mahoosuc Unit (page 6). We believe this has made a noticeable difference in curbing illicit ATV use in this tract. Why not use this approach on the Bald Mountain Unit (top of page 9)?</p> <p>Stream crossing issues on roads were discussed above in the section of these comments on Brook Trout Conservation/Stream Connectivity. On</p>	<ul style="list-style-type: none"> • Comment noted. Regarding the Bald Mountain Unit, there are no authorized ATV trails on the Unit, and the Bureau is not aware of a substantial problem with unauthorized use. ARWC is encouraged to share any specific information they may have on the issue. • Measures employed when road are put to bed include removal of all culverts and bridges,

<p>page 18, the review states: “After [timber] harvest is completed, roads, trails and water crossings are put to bed as appropriate”. What are considered “appropriate” measures? Does anyone go back from time to time to check on these roads to see if erosion problems develop? If there is a problem, who fixes them?</p> <p>Long-term monitoring is important. ARWC personnel have observed how logging roads and skidder trails in the upper Sunday River Watershed on private property adjacent to the Mahoosuc Unit that were put to bed became major erosion problems over time. Nobody was keeping an eye on them and fixing problems.</p>	<p>and stabilization of soil with erosion control material and/or planting of vegetation and seeding. BPL staff periodically inspect these roads, particularly in the first few years after the are put to bed, and will take action to address any problem areas.</p>
<p><u>Hobby gold panning</u> Hobby gold panning (discussed on page 14) seems like an innocuous activity. However, use of hydraulic and suction motorized equipment can have serious consequences on stream health, especially if the banks are dug out. The Four Ponds Unit straddles the Height of Land, and part of this unit drains to the headwaters of the Swift River, which is in the Androscoggin Watershed and is known as a quality trout stream.</p> <p>It has been reported to ARWC that substantial damage has been caused by ATVs creating their own trails into the headwaters of the Swift. This being the case, ARWC recommends the following measures be implemented:</p> <ul style="list-style-type: none"> • Require walk-in use only, except on designated ATV trails; • Block off non-designated ATV-created trails; • Install educational kiosk(s) at the parking area(s) for the Four Ponds Unit that explain what and where gold panning is allowed. The regulations concerning gold panning are confusing so this could be an important educational tool for the casual user; • Keep motorized equipment out of streams; • Improve enforcement. Consider the use of drones to monitor use. <p><u>Note:</u> These issues and recommendations apply to the Small’s Falls Unit as well. Small’s Falls is at the headwaters of the Sandy River, which is just outside the Androscoggin River Watershed. But we feel it is worthy of mention in these comments as gold panning seems to be a significant use on Chandler Mill Stream at the head of the Sandy River.</p>	<ul style="list-style-type: none"> • The IRP, in policy D-10, provides guidance for management of this activity, including the provision that the Bureau may specify conditions or restrictions on methods, tools, and remediation at designated locations. A special activity permit is required for the use of mechanical equipment, with limits on the size/capacity of the equipment, in those locations where the activity is allowed. • There are no designated ATV trails on the Four Ponds Unit other than the Sandy River Plt. parcel, outside the Swift River watershed. We believe ATV use on the Unit is primarily on the part of campowners, some of whom have a BPL permit for access to their camp. The Bureau is not aware of a significant amount of gold panning activity on the Unit, but encourages ARWC to share whatever information they may have. The Bureau will follow up with ARWC regarding these concerns and is also willing to conduct a field visit with ARWC to further investigate. • As mentioned in the Plan (p. 117), the Bureau has in the past issued special use permits on request for recreational gold extraction on Chandler Mill Stream at the Smalls Falls Lot. IF&W concerns about impacts on fisheries are addressed in the plan. Requests for permits have been denied in recent years, upon consultation with IF&W Fisheries.

<p><u>Other Items</u></p> <p>1) The map on the website mistakenly labels Mooselookmeguntic Lake as Cupsuptic Lake. It also appears that this map has omitted labeling "Township E", which presumably includes the part of the Four Ponds Unit that drains to the Swift River, and Small's Falls.</p> <p>2) We would like to know whether BP&L has conducted barrier assessments on its units and, if not, when the agency plans to do so and/or whether the agency keeps a database of stream crossings. This goes back to the stream connectivity issue discussed earlier in these comments. This data is invaluable to prioritizing stream crossings for restoration. If BP&L has conducted such inventories, the plan should state which watershed(s) have had an inventory. If not, ARWC may be able to augment BPL funds to conduct stream barrier assessment(s) by securing matching funds.</p>	<ul style="list-style-type: none"> • The Western Mountains Region map (on page 3 of the Plan and posted on the website) will be revised as needed when the plan is updated, at the conclusion of its 15-year lifespan. • BPL utilizes the statewide dataset collected by partners, and stream barrier surveys are now mostly complete for all BPL lands in partnership with the Stream Smart program. Because BPL is a state agency, data collected on crossings on BPL parcels are publicly available via the Maine Stream Habitat Viewer. BPL is exploring methods for providing updates to data managers on these stream crossings as sites are visited by BPL staff. Staff are receiving training and beginning to use the stream barrier data in prioritizing and planning road work. Barriers will be addressed as the opportunity arises, where specific priorities are identified but largely during the course of periodic road maintenance, in accord with the most up-to-date standard and with the goal of constant improvement in stream connectivity across the land base.
<p><i>From: Gordon Gamble, Wagner Forest Management</i></p>	
<p>Mahoosuc Unit <u>Trail Access</u> Regarding the concern over access to Speck Pond and or Notch Trails, I don't remember there being an access issue with those trails unless the logging road was not travelable or closed for mud season. My recollection as a former manager of the private ownership surrounding those trails is that AMC has a deeded right to maintain those trails and their respective trail heads (This was established when Brown Co. owned the land). There may have been a relocation due to logging in the past but I don't think trail access is an issue worthy of noting in the plan unless it is to clarify the rights of way.</p> <p>Rangeley State Park <u>ATV trail connection</u> Representing the landowner to the south of the park, we have worked with the local ATV club and the State ATV Program to construct a trail that connects club trails in Oquossoc to BPL's trails leading to Sandy River Pt. As part of those discussions, it was hoped to develop a short trail and hopefully a park and ride at the State Park</p>	<ul style="list-style-type: none"> • Although there were concerns about access to the trail sections across private lands when the plan was developed, no specific access issues have arisen since the plan was adopted, as reported in the review table. The issue will be revisited when the plan is updated, at the end of its 15-year life span. • The Bureau remains open to the concept described. However, important issues would need to be resolved to implement the project, including permission for the trail segment on private land and/or DOT approval for an access route on the public road, location of the park and ride and integration with

<p>entrance off South Shore Rd. I would suggest such a project be added to the plan.</p>	<p>Rangeley Lake State Park management and operations, and funding for construction.</p>
<p>From: Shelby Rousseau, Rangeley Lakes Heritage Trust</p>	
<p>Rangeley Lakes State Park <u>Potential new hiking trail</u> RLHT remains open to the Bureau's previous discussion regarding potentially creating/joining hiking trails to RLHT's South Bog parcel. As a reminder, the original conversation to expand trails stemmed from a land transaction between RLHT and the Bureau, which effectively added 170 acres to the State Park.</p> <p>Richardson Unit <u>Upper Dam Road Gates</u> RLHT is satisfied with the revision to the Upper Dam gate system which provides clearer public-use of the BPL/RLHT lands. RLHT encourages the Bureau to update the Map and Guide as soon as possible. At a time of encouraged and increased recreational activities, accurate maps are important for location purposes, but more importantly, to maintain positive relations with surrounding landowners and other recreational users. If the Bureau needs, we are willing to provide any updates necessary for revisions.</p> <p>Bald Mountain Unit <u>Trail conditions and access</u> Bald Mountain Trail conditions have improved dramatically. We encourage the continued relationship between TRAC and the Bureau. Despite signage directing hiker-parking overflow to the Route 4 parking area, the Bald Mountain Rd parking area remains at over-capacity. Is it possible to make this secondary parking more apparent on trail guides or other?</p> <p><u>Cell tower proposal</u> RLHT will continue to work with the BPL to evaluate the cell tower proposal and its conformity with the existing lease provisions.</p> <p>Four Ponds Unit <u>Access to Beaver Mountain Lake</u> Due to use and demand for access to Maine's water, RLHT supports the continued exploration of public access to Beaver Mountain Lake. This non-wild brook trout water, with appropriate legal permissions, can be easily accessed from the</p>	<ul style="list-style-type: none"> • Comment noted. The BPL Parks division will continue to explore the potential for this trail system expansion. A concern associated with the potential trail connection is that it would provide a means of public access to the park from RLHT property that bypasses the fee booth at the park entrance. There are also zoned and biological deer wintering areas in the area that need to be considered when discussing opportunities for trail expansion if winter use is envisioned. • Comment noted. • Comment noted. The Bureau takes particular note of the suggestion for better publication of the Route 4 parking area and will take this into consideration on trail guides (note - both parking areas are shown on the maintrailfinder website) and the pending Richardson Lake map and guide (which may also address Bald Mountain due to its proximity). • Comment noted. • Comment noted. See previous response regarding this potential new boat access.

Byway and potentially contribute to the Region's lack of ice-fishing opportunities.

Unauthorized ORV use

Despite attempts to stop unauthorized use of snowmobiles and ATVs on both RLHT and the NPS lands, the issue continues. As a reminder, this 2009 issue stems from an unauthorized trail that was cut through RLHT and NPS lands (not by Rangeley Clubs), which ultimately gained access to the Four Ponds Unit trails. This behavior resulted in RLHT and NPS closing off the new trail as both organization's deed prohibits motorized recreation. We continue to stage snow fencing and place signage, but it is not effective. As enthusiasm for outdoor activities continue to grow, we recognize we don't stand alone in this problem. RLHT encourages the Bureau's ongoing work with local Campowners and Clubs in a manner that supports responsible use of private and public lands, particularly where land use objectives differ, or the law does not allow.

Smalls Falls

Hobby Mineral Collecting

RLHT encourages the continued coordination between the Bureau and the MDIFW regarding "hobby mineral collecting". This is a regionally complicated and controversial topic that can be vague in its definition, leading to the misunderstanding of allowed uses. RLHT prohibits the *mechanical extraction* of minerals on its conserved lands where wild/native brook trout are within the waters (Bemis, South Bog, Rapid, Rangeley and Magalloway) and urge the State to continue its research to determine suitability for mechanical extractions and/or manual panning practices.

- The Bureau's ORV program will follow up with RLHT regarding these continuing concerns and possible BPL responses.

- Comment noted. See previous response (page 6) on this topic.

From: Noah Pollock, Northern Forest Canoe Trail

Richardson Unit

Condition of boat-in campsites

We have had reports that use at some lakeside campsites may be degrading shorelines and riparian vegetation. It would be helpful to understand what rights BPL has through the existing conservation easements. BPL should consider completing an assessment of user impacts at sites, and work collaboratively to put together a plan to address site impacts. A similar approach has been used by NFCT and BPL along the Moose River corridor. The Northern Forest Canoe Trail is happy to put our stewardship crew

- It is not clear whether the campsites referred to in the comment are among the 12 boat-in campsites on BPL fee property at Richardson Lake, managed by the South Arm Campground under a lease agreement (see page 95 of the Plan). Numerous other lakeside campsites on the lake are not located on BPL property.
- The Bureau is interested in scheduling a site visit with NFCT to assess the shoreline and riparian vegetation in the vicinity of the BPL boat-in campsites. If substantial and/or worsening impacts are documented, the

<p>and community volunteers to work on an assessment as well as site improvements.</p> <p>Kennebago Lake <u>Public Access</u> The update states that in 2016 “BPL has coordinated changed operation of gates to improve access”. However, instructions on public access to the lake is difficult to obtain. In 2019, gate operators at the Kennebago River Rd gate refused to grant NFCT access to the Stetson Lot, and appeared openly hostile to public access. We encourage BPL to provide a better description of where and how to obtain access to the lake on its website and any new publications, and to provide a clear mechanism to report challenges obtaining public access.</p>	<p>Bureau will consider options for addressing them. The Bureau takes note of the successful completion of site improvements by NFCT on the Moose River Bow Trip in recent years.</p> <ul style="list-style-type: none"> The lack of public vehicular access to the Kennebago and Stetsontown Lots on Kennebago Lake remain a challenge. The Bureau will consider means to provide better information on the current arrangement for public access with the owner of the road to the Stetsontown Lot and Grants Camps.
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Summary of Additional Comments from non-Advisory Committee Members and BPL Responses on the Western Mountains Region Management Plan 5-Year Review for 2021
Comment Period January 25, 2021 – February 15, 2021

Comment	Response
From: David Walker	
<p>Mahoosuc Unit <u>Winter bike use and access</u> During a previous review there had been a willingness to allow the Bull Branch watershed area to be open to grooming of cross country ski trails with a motorized groomer. I would suggest that recommendation be expanded to include the development and grooming of fat bike recreational opportunities with a motorized groomer as well.</p> <p>I would also recommend that a winter parking area be developed just outside the Bull Branch road gate that is located just beyond the red leased cabin. It may necessitate that the gate be moved further up the valley to give the owners of the leased lot a bit of privacy. They have currently roped off their front yard as people have been inconsiderate in the use of their plowed drive.</p>	<ul style="list-style-type: none"> The Bureau would be open to a specific proposal from a group willing to take a lead role in a ski trail project including the funding of construction and maintenance costs. Among other topics, a proposal should address the objectives of the proposed trails in a regional context, compatibility with existing resource allocations and other uses of the public lands, conceptual trail routes, public safety, and trail maintenance. The addition of winter fat bike use to such a proposal is an emerging issue that the Bureau is exploring at a number of sites and plans to address in the upcoming IRP update as well as through working with groups on specific proposals. If after considering the management implications of the proposal the Bureau determines that the project may be workable, the Bureau would bring the proposal to the Advisory Committee for input, and potentially engage in public review as required to amend the plan.

From: Tyler Ray, Granite Backcountry Alliance

<p>Mahoosuc Unit/Grafton Notch State Park <u>Proposal for development of glade skiing</u> <i>[The following is the opening paragraph of a 7 page proposal document.]</i> Granite Backcountry Alliance (“GBA”) proposes consideration of backcountry skiing into the management plan for the Mahoosuc Unit and Grafton Notch State Park (the “Project Area”). The human-powered activity is neither covered nor contemplated in the 2011 Western Mountain Management Plan (the “Plan”) nor considered in the 2015 updates. Since 2011, backcountry skiing has launched into the mainstream and is the fastest growing segment of the ski industry both nationally and in Maine’s own \$300 million industry. GBA strongly recommends the inclusion of backcountry skiing in the Project Area as (i) circumstances have changed since 2011 and (ii) the Plan requires reconsideration of “new” or “changed” circumstances or conditions in order to balance recreational activities within the Project Area, all of which would warrant amendments to the Plan.</p>	<ul style="list-style-type: none">• While Bureau lands are open to remote backcountry skiing, managed glade skiing with designated glades, parking or other amenities represents a new use of the public lands; as such, the Bureau would benefit from the experience gained with the successful implementation of a pilot project before moving forward with a proposal, which GBA has submitted for other locations in the Western Region as well as at the Mahoosuc Unit/Grafton Notch SP. The concept of a pilot project was discussed during a March 15 videoconference with GBA. The Bureau is open to continued exploratory discussions on the topic of glade development.
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From: Noah Pollock (AC member commenting as private citizen)

<p>Mahoosuc Unit/Grafton Notch State Park <u>Proposal for development of glade skiing</u> I’m writing to express my support of BPL’s proposed action to creation a recreation management system of the Grafton and Mahoosuc lands that “realize the benefits of the many partnerships which bring energy and capacity to this dynamic recreation area”, and to recommend BPL explore opportunities to create new backcountry ski routes in these two mountain ranges.</p> <p>Interest in backcountry skiing is exploding. For the past five years, Saddleback mountain serves as a popular destination in western Maine for those that sought the exercise and solace “earning ones turns” in the mountains has to offer. However, these recreational opportunities have been lost with the reopening of the resort.</p> <p>The Granite Backcountry Alliance has been successful in recent years to work with public and landowners to create designated ski routes and glade zones, including at Rumford Whitecap Mountain Preserve. We recommend BPL build a partnership with the Granite Backcountry Alliance to explore opportunities for establishing and maintaining new backcountry ski trails in the Grafton and Mahoosuc areas.</p>	<ul style="list-style-type: none">• Comments noted. See preceding response.
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<p>Creating new trails and glades has impacts. Care is needed to site any new routes to take advantage of existing access infrastructure, such as skid roads, parking areas, and trails, and away from sensitive ecological areas. It may be possible to create gladed zones that meet timber stand management objectives, particularly low impact forest stand thinning, while providing new opportunities for winter recreation.</p>	
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