



**BELGRADE
REGIONAL
CONSERVATION
ALLIANCE**

Maine Department of Conservation
attn. Cindy Bastey
Bureau of Parks and Lands
State House Station 22
Augusta, Maine 04333

August 15, 2007

Dear Conservation Friends,

BRCA's mission is primarily to preserve the natural heritage and water quality of the Belgrade lakes region. We also have made it our mission to encourage public access to all the lands we conserve for traditional uses such as hunting, trapping, access to waters, and other non-motorized use. Thus BRCA is a real partner in offering a future for public use of open space to everyone. In addition to the Kennebec Highlands project which came about as a result of the hard work and initiative of our volunteers, BRCA has preserved over 1000 acres in the area and is poised to add several hundred more in 2007.

BRCA's Board of Directors has reviewed the draft management plan for the Kennebec Highlands and these comments represent the consensus of the Board. We also feel they represent the broad spectrum of opinion of our 1000 members and hundreds of other users. BRCA's stake in this comes from our unique perspective as a major sponsor in the acquisition and management of this public land as well as the need to maintain a balanced view concerning its management. BRCA volunteers spent countless hours raising over a million dollars for this project and even more time in dealing with all sorts of KH-related items, including planning and maintaining trails and public access. Thus BRCA represents the interests of people who really have put themselves on the line for this. We also speak for many hundreds of other visitors each year, many of whom are not organized directly to weigh in on this topic as much as some other user groups

We want to commend the staff of DOC for the hard work and thoughtfulness captured in the draft and find a lot in it to be encouraged by. We support most of the provisions in it, especially the goals of careful stewardship, safeguarding the most sensitive areas while meeting the Department's need to pursue forest management, and for providing a variety of public uses. In a number of cases, such as use of the Dolley property, the draft correctly identifies areas of broad consensus and outcomes while acknowledging need for further work to develop the best options. In this respect, the Plan is a working document which we expect will continue to evolve especially in the case of items such as road status, disposition of existing buildings, future access points, and other items which either

cannot be fully fleshed out at this time or about which there are significant differences of opinion. Also to be developed further is the role BRCA will play in stewarding the Highlands. We welcome further discussion with DOC on such topics as establishment and maintenance of trails and access points, educational uses, and natural resources inventories.

The one issue that has spurred considerable debate among a large number of KH users, and which poses special management concerns, surrounds ATV access and use in the Highlands. The future of ATV's in the Highlands was not dealt with specifically in the 1998 Kennebec Highlands Project and LMF proposal. At the time we felt it was not very extensive but was already causing problems in several areas. The idea of significant increase in ATV access to the Highlands is a major concern

We understand that public land is also a public trust, which implies responsible use. It also implies use by a wide variety of the public, *where those uses can coexist and long term conservation is not significantly compromised*. We acknowledge that DOC is in a difficult position in trying to balance public uses, but the significant unease that much of the public has over ATV recreation and the many interests of non-motorized users should be carefully weighed.

BRCA seeks to be a responsible partner with DOC and wants to emphasize the degree to which ATV use represents not just a compromise in management, but in the values and expectations of a significant number of our members and supporters who are not only contributors but taxpayers as well.

ATV Management Options in the Kennebec Highlands

BRCA does not recommend ATV use in the Highlands on conservation grounds as well as the significant management problems and user conflicts anticipated. We recognize that DOC must weigh public demands for a wide variety of uses on public lands and that the stated primary goal of ATV users is to link trails outside the Highlands together providing seamless access to significant riding opportunities located in the greater region. BRCA hopes that a management scheme can serve all of the users of the Highlands while minimizing user and management conflicts. We recognize also that the Management Plan should be an evolving document so there will be opportunities over time to refine management approaches, especially where there is lack of consensus in initial proposals.

In this light, BRCA recommends:

- 1) DOC should not adopt management that will significantly increase ATV pressure in the Highlands and *in particular* any actions that will make it a magnet or "destination" for ATV's at this time. Such actions include establishing loop trails, east-west connectors, and parking lots. Widely distributed use will be destructive of the resources and the vision of those who worked to establish the Highlands and of so many who use it today.

We particularly do not think a link to the Blueberry Hill should be developed at this time. It will serve as magnet that will significantly increase ATV traffic use in the eastern Highlands (as opposed to north-south traffic originating on existing ATV routes and by local users). It will also increase traffic in an area adjacent to several dwellings and the Round Top Trail. The inevitable use of Blueberry Hill as a parking as staging area for ATVs from outside the area has the potential for management problems at that site and elsewhere in the eastern highlands.

2) We have been shown a proposed route which includes Suicide Hill, the Kennebec Highlands Trail, and the Singletrack. In addition to its significant length, it has a number of real drawbacks not the least of which is that it passes by some of the most sensitive conservation areas (Beaver-Round Pond area for example).

In addition, it routes ATV's throughout a large part of the KH area, and will result in a lot of riding off the designated trail simply by virtue of offering access to so many trails and old roads regardless of their suitability. This is particularly sensitive in light of the potential for off trail riding onto certain private lands which could jeopardize negotiations for future key acquisitions.

It also will pose a major conflict with foot and pedal-powered recreation, due to co-location of parts of Sanders' Hill and Round Top Trails. We do not believe it is possible to manage such incompatible uses in close proximity, even with alterations to the current foot trails.

Nor should this proposal be viewed as a temporary option while western corridor is explored. Once ATV use is established in the eastern Highlands, it will become a permanent reality. Due to the significant drawbacks, lack of consensus among user groups, and management difficulties, we urge DOC to delay establishment of any ATV route in the eastern highlands area until a clearer consensus can be crafted and the capacity to manage use and conflicts is clearly demonstrated.

3) Any permanent ATV trail within the Kennebec Highlands should be placed in the Western Highlands. There are lower-impact routes that should be pursued as a means of connecting existing exterior trails in the north and south. The cost of building a dedicated trail in the western Highlands to link some of the existing trails will be more than offset by safeguarding conservation values and reducing user conflicts. This will separate incompatible uses while still meeting a key demand for ATV use in the region. To this end, a priority should be given to land /easement acquisitions in the western region to allow trail establishment. *We would support this.*

One promising option is to seek permission from the town of Vienna to use portions of the Berry Hill Road, and especially the Kimball Pond Road, for ATV use which could make ATV access through that area a reality now and facilitate an eventual link completely through conserved lands in the west. Clarifying the status of the Berry Hill Road for public access should also be a priority.

4) Adequate resources must be devoted to dealing with conflict management, which should emphasize user education up front and by providing oversight presence at strategic times. This should include some structured oversight by user groups interested in promoting responsible ATV use of the Highlands. There is also the potential for a cooperative agreement with the Kennebec County Sheriff Department or other law enforcement agency.

We anticipate that mostly problems will not be from ATV club members, but from less responsible riders and they will be numerous. Problems with ATV usage can be partly, but not fully, avoided by the active participation of ATV clubs and they have the opportunity here to begin changing public perceptions of ATV use.

Ideally there would be an agreement with local ATV clubs to partner with DOC in managing the route including periodic stewardship visits, educating users, placing adequate signage, and section closings during mud season. One option that has proven successful elsewhere is an arrangement between an ATV club and The Nature Conservancy. In this case the club and the landowner (TNC) agreed that the club will grant or refuse permission for riding on the property based on users contacting the club and being given information about responsible use. The club also watches over the trails, thus preserving their access to the area and the rights of the owner. Such an arrangement between clubs and DOC could go a long way toward ensuring future access by ATVs not just to the Highlands but by example to private lands as well.

Thanks for the opportunity to comment on the proposed plan. We will be happy to discuss this with DOC staff and look forward to cooperating with the Department on future Kennebec Highlands management decisions.

Sincerely,

Roy Bouchard
President, BRCA

cc. BRCA Board
BRCA Stewardship Committee
Dr. Peter Kallin, Executive Director