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August 31, 2016

Tim Hudson
NPS Facilities and Parks Manager
Katahdin Woods & Waters National Monument
Millinocket, ME

Dear Tim:

We welcome an opportunity to work with our new neighbor, Katahdin Woods & Waters National Monument (KWWNM), and provide some background on Baxter State Park as well as articulate some concerns we hope you will consider as you develop your management plans for KWWNM.

Baxter State Park is best considered as a large public trust. The Park was assembled by former Maine Governor Percival P. Baxter. During his tenure as a state legislator and later as Governor, Baxter worked to promote the establishment of the area around Maine's highest mountain, Katahdin, as a State Park. His efforts were unsuccessful, so after leaving public service in 1925, Baxter quietly began work to establish the park on his own. His first purchase of 5,960 acres in 1931 included Baxter Peak and Katahdin. After establishing ownership, Baxter gifted the parcel to the Maine legislature in trust accompanied by communications to guide the management of the land in a "Forever Wild" condition. This first gift was followed by 27 others, completed by a final gift in 1962, bringing the Park to 201,018 acres. The 28 parcels, accepted in trust by the People of Maine, are bound together as a single trust known as Baxter State Park.

The Baxter Deeds of Trust and Formal Communications provide the foundational guidance for the Park's mission and management, including the placement of the protection of the Park's resources ahead of the provision of recreational opportunities.

“This area is to be maintained primarily as a Wilderness and recreational purposes are to be regarded as of secondary importance and shall not encroach upon the main objective of this area which is to be “Forever Wild.”

As the visitation to the Park increased in the 70s and 80s, the Authority instituted policies limiting the number of people with daily access to Katahdin trails and Baxter Peak in order to control and stabilize the impact of hikers on trails and the alpine zone of Katahdin. This limited use model is one of the defining features of management in the Park and is intended to preserve natural systems and provide a wilderness experience ***“for those willing to walk and make an effort to get close to nature”***.

In addition to the land, Baxter included two other critical components to ensure the durability and independence of the Park. In 1939, legislation was enacted to form the Baxter State Park Authority. The Authority, consisting of the Director of the Maine Forest Service, the Commissioner of Inland Fisheries and Wildlife and the Maine Attorney General, act as the Trustees for the Park. This body has administered the management of the Park in accordance with the Trust provisions for more than 75 years. Lastly, with his death in 1969, Baxter provided an endowment for the management of the Park. The endowment is managed for generational sustainability and has provided 60% of the annual operating revenue for the Park for almost 50 years. The remaining 40% of the Park's revenue is captured from user fees and the sale of forest products from the Park's Scientific Forest Management Area. The Park receives no appropriations from the Maine Legislature, and due to its trust nature is defined as a “quasi-State agency”.

Since 1969, the Baxter State Park Authority has acquired additional lands appropriate to protect the Park's boundaries or to complete Baxter's vision for the Park. These acquisitions bring the current size of the Park to approximately 209,643 acres. The Park manages approximately 100 miles of boundary with more than a half dozen

public, corporate and private landowners, conservation easements and recreational leases.

Baxter State Park has been managed in accordance with the Deeds of Trust since 1931. During the summer season, the Park employs more than 60 people as well as 20 or more additional personnel working under contracted services, making the Park one of the largest employers in the region. The annual budget for the Park is just under \$4 million and the annual visitation is around 75,000 people. Although the majority of our visitation is during the summer season, the Park hosts a significant number of winter users. The Park is managed in accordance with a [Management Plan](#), most recently approved in 2012 by the Baxter State Park Authority. [An Economic Impact Study conducted in 2007](#) indicates that Baxter State Park drives approximately \$7,000,000 in revenue to the Katahdin region each year. The Park Management Plan, the Economic Impact Study and other detailed information about Baxter State Park can be found on the Park's website www.Baxterstateparkauthority.org.

I hope that you find this brief background helpful as we work toward building a relationship as neighbors and as you begin a challenging planning effort in defining the scope, structure and management guidance for the Katahdin Woods & Waters National Monument. Recently, we have taken some time to consider potential issues regarding resource protection and visitor experience that may arise regarding our shared boundary due to differences in our core missions and use expectations of our respective organizations.

Access - Roads

For a significant distance westward of our shared boundary, the majority of the Baxter Park landscape is free of roads or trails available for motorized access. The nearest Park road to the KWWNM is the Roaring Brook Road. The Roaring Brook Road approaches to approximately 4 miles from the KWWNM at the Park's Avalanche Field Trailhead. North of Katahdin Lake our shared boundary borders some of the most pristine wilderness areas in the Park, including North Turner Mountain, the Wassataquoik Basin and the Traveler Range. The landscape of the KWWNM has a long history of human use. Various human activities have left an in-situ footprint of roads, buildings and trails that you will have to consider in your planning of the design

and application of access and facilities for the KWWNM. Numerous roads suitable for motorized access on the KWWNM approach very near to the Park's eastern boundary in many locations. Historically, these roads have been utilized for forest management and wood products transportation. Recreational access has been sporadic and limited. Improved access routes and/or the encouragement of more motorized access by the public up to or near the Park's boundary would be a serious concern for the preservation of the pristine and un-crowded nature of the Katahdin Lake, Wassataquoik Valley, North Turner, and the Traveler areas along the Park's eastern side. [Russell Pond is considered to be the most remote place in the state](#), as defined by the distance from roads. We are proud of this remoteness and hope you will work with us to preserve it.

Access - Trails

Many of the same concerns expressed above for motorized trail access also exist for hiking trail access to or near the Park boundary. Currently, the Park has one hiking trail that travels briefly across KWWNM lands. This trail provides day-use hiking access to Twin Ponds from Katahdin Lake and Katahdin Lake trails. Access was authorized through a Memorandum of Agreement between Baxter State Park and Elliottsville Plantation, Inc. The Park has not installed an authorized campsite at Twin Ponds and hiking access to this area is day-use only, typically backcountry campers staying at the Park's North Katahdin Lake Lean-to (~4 miles from the Avalanche Field Trailhead on the Roaring Brook Road), or from Katahdin Lake Wilderness Camps, by visitors who canoe to the north end of the lake and access the Twin Ponds Trail there. The access to Twin Ponds has been purposely limited to protect the pristine nature of the Twin Ponds area. Access to this area by large numbers of people would threaten to damage the intrinsic qualities that are consistent with Park objectives in the management of this area.

The Park also currently maintains a one mile trail from Katahdin Lake Wilderness Camps to the former Rocky Pond Road on KWWNM land. The trailhead also currently serves as the southern terminus of the International Appalachian Trail. Other options exist for this terminus of the IAT. The establishment of motorized or easy hiking access to this trailhead by significant or substantial numbers of people would jeopardize the pristine nature of Katahdin Lake Wilderness Camps. These historic camps have a long history in the Park, including a visit by Theodore

Roosevelt in 1879 and a subsequent visit by Percival Baxter in 1920. The aura and nature of the camps are predicated and defined by a long history of back country access and limited use. The potential for significant increases in the number of people accessing this area from KWWNM is a serious concern for our continued management of this facility.

In the Park's 2012 Management Plan, the Baxter State Park Authority approved the establishment of several [Trail-Free Zones within the Park](#).

4.4.2.6.3 Action Establish four Trail-Free Zones within the Park totaling 64,463 acres, in which new trail construction will be prohibited for the following reasons: To protect the Park's most wild and pristine areas from the impacts that direct trail access will bring. To protect the Park from assuming trail maintenance responsibilities outside its staffing or financial capability to support. Resolved: The proposal for the establishment of four Trail Free Zones in the Park was included in the proposed management plan. The approval of the plan on March 9, 2012 established the Trail-Free Zones within the Park as defined in the map included in sec. 10.2

The original design left a corridor along Wassataquoik Stream from the eastern Park boundary to the south branch of Wassataquoik Stream. After consideration, the Baxter State Park Authority removed this corridor, combining two Trail Free Zones by the inclusion of Wassataquoik Stream into the Trail-Free Zone by unanimous vote during an [October 10, 2014 public meeting](#).

The Trail-Free Zone delineation applies to at least 50% of our shared boundary. The remaining boundary is around the Katahdin Lake acquisition. As discussed above, the protection and preservation of the pristine nature of these historic camps and the limited backcountry campsites and hiking trails installed after the acquisition is a very important concern to the Park. We are concerned about the potential for motorized and non-motorized access by large numbers of people with the establishment of the KWWNM, and we urge you to consider methods that would buffer or mitigate visitor use impacts and complement the Park's wilderness management west of the KWWNM property line.

Viewshed

Existing road infrastructure in the Kelloch Mountain area of the KWWNM includes areas providing unobstructed views of the southeast areas of the Park including the Keep Ridge, the North Basin of Katahdin, the Knife Edge and Pamola and Baxter Peaks. As these areas are clearly visible from these road-access viewing areas, Park hikers and campers in various locations can also see these higher areas to the east. We strongly suggest that the planning process for the facility and access structure of the KWWNM include the consideration of visual impacts to Park visitors on Katahdin and other mountains and ridges in the southeast corner of the Park. We are particularly concerned with the addition of significant structures that may be visible from areas on Katahdin, and from the impact of night lighting in the currently very night-sky-friendly area east of the Park. We would be very interested in participating in your infrastructure planning as it relates to view corridors.

Invasives

Invasive plants and animals are a continuing concern for Park management, and we expect that the planning of KWWNM will include management options for the protection of the KWWNM landscape from the introduction and impact of invasive plants, insects and animals. Baxter State Park has prohibited the transport of firewood into the Park by visitors as a protective measure against the import of a number of serious exotic insects. We regularly monitor the Park for invasive plants and cooperate with the Maine Forest Service and others on monitoring for invasive insects. We have been active in removing or containing found populations of purple loosestrife. We encourage the management of KWWNM to incorporate similar measures into their management and we look forward to cooperating with you on this important landscape management issue.

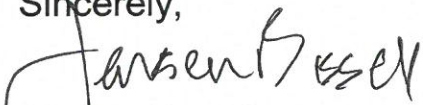
Fire Management

The Maine Forest Service provides statewide fire suppression authority for the forestland of the State of Maine. While there is a long history of anthropogenic fire in Maine, there is also a long natural history of fire on the Maine landscape, including extensive stand-replacement events. In cooperation with the Maine Forest Service, we have developed a comprehensive [Fire Management Plan for Baxter State Park](#). This plan considers fire management in the wilderness context of Baxter State Park.

The prevailing winds in Maine are from the northwest; consequently we hope to work with you on fire management and suppression related planning.

In closing, we would like to once again welcome you to the Katahdin Region. We recognize the significant differences in our organizational structures, visitor volume, and foundational management guidance, but we believe we can build a trusting and effective working relationship as neighbors in this important region. Thank you for your consideration of these issues; we look forward to continuing our discussion as you settle into your work at the Katahdin Woods & Waters National Monument.

Sincerely,

A handwritten signature in black ink that reads "Jensen Bissell". The signature is written in a cursive style with a large, looping initial "J".

Jensen Bissell

Director - Baxter State Park

