LOWELL LAKE STATE PARK LRMP ADDENDUM

Public Comments and Responses

February 28, 2018

LONG RANGE MANAGEMENT PLANNING AND IMPLEMENTATION

Projects conflict with mission statement and threaten resources.

The activities proposed are consistent with the mission of Vermont State Parks and the Department of Forests, Parks & Recreation.

The mission of the Vermont Parks Division is:

To conserve and interpret on behalf of the people of Vermont, their natural, cultural, historic and scenic heritage, and while so doing, to provide recreational opportunities and economic benefit. The emphasis on this dual role should be provided only within the ability of the natural and cultural resources to support the activity.

Department Mission:

To practice and encourage high quality stewardship of Vermont's environment by:

- Monitoring and maintaining the health, integrity and diversity of important species, natural communities, and ecological processes
- Managing forests for sustainable use, including providing and promoting opportunities for compatible outdoor recreation
- Providing related information, education, and service

Forestry Division goals include practicing and encouraging high quality stewardship of Vermont's forested landscape and outdoor recreation. These include sustainable timber management and recreational activities, wildlife habitat and management, restoration or protection of water resources, biodiversity, natural communities, and cultural and historic resources.

In addition, sustainable timber management is a primary planning goal for ANR Long Range Management Plans (LRMPs) and <u>Vermont's 2017 Forest Action Plan</u> for both private and public lands.

Forestry goals for the LRMP Addendum are explained in detail; they focus on improving wildlife habitat, creating uneven-aged forest stands, and mitigating safety hazards to visitors posed by trees.

LRMP for Intensive Use Area should include site plan.

A site plan is premature for the LRMP Addendum. Once the Addendum is adopted, more specific planning and design will begin. The footprint of the proposed redevelopment is within the existing day use and overnight use areas without significant expansions outside of these areas.

Old draft goals do not reflect current situation and type/level of use and what public has grown accustomed to.

The level of use and the types of uses have certainly changed since the last plan was adopted in 1999. That was the rationale for updating the goals and developing a new plan to address these changes and put forward a more comprehensive strategy to accommodate and balance recreational use and resource values. We believe the proposed activities are compatible with current use and recreational demand and trends.

FOREST AND NATURAL RESOURCE MANAGEMENT

Timber harvest will decrease property values and result in excessive noise. Logging will detract from quiet natural feel of the park.

Timber harvests will occur over short time spans with long intervals of no activity between such projects. We can restrict hours of operation and trucking to lessen impact. We can also limit products removed to limit truck trips. More downed woody material is left on site which is positive for soil development and wildlife but results in a longer period of extra wood on the ground that can impede public use in the short term.

In our experience we have known of no adjacent properties' values being affected by vegetative management practices on lands that we manage. We anticipate property values adjacent to Lowell Lake State Park (LLSP) will not be impacted by timber harvest operations on the state property.

Logging is extensive and disruptive.

Logging can be an infrequent disruption for short periods of time. The draft Addendum called for three harvests over a five-year period. A shortened 5-year period was recommended because each harvest includes a component of salvaging trees that are high risk. However, to mitigate some of the local impacts associated with harvesting, we will extend the interval between harvests to four years instead of two and complete the harvests over eight to ten years instead of five. Each job will take approximately six months to complete and occupy a different space on the property. Impacts will be further limited by restricting harvest to very dry or frozen conditions and limiting hours of harvest operation and log trucking.

Will the State use Mountain Lake Road for log trucks?

Mountain Lake Road will not be used for hauling logs from LLSP.

There should be no clearcutting, and old pines and other unique trees should not be cut.

Clearcutting is not proposed. Because of their value to fall foliage, red maple visible from the lake will be retained at higher density and for longer than is typical in forest management. Most of the largest pines in visible locations will be protected from regular forest management activity. They will only be removed if they pose a safety hazard to visitors or structures. Stands of large pine seen from the lake and park roads and trails that are thinned (harvested) will be done so conservatively to minimize aesthetic impacts. Harvest design will follow principles outlined in "A Guide to Logging Aesthetics" by the Northeast Forest Resources Extension Council (NRAES-60).

The term "clearcutting" is an even-aged silvicultural prescription designed to regenerate forests for many reasons such as stand decline, lack of productivity, storm damage or insect/disease mortality in large blocks such as 10 acres or more. This practice usually results in the regrowth of early successional habitat (young trees and/or trees of "pioneer" species) which greatly benefits some species of wildlife keyed to those conditions. The draft LRMP Addendum calls for small patches on the order of ½ acre to 5-acre groups. We will reduce the maximum size to three acres and conduct where aesthetic impact is minimal. More typically openings will be ½ to 1 acre where softwood regeneration is the objective. They will be situated so none are visible from the lake.

Regarding Barber Lot, concerned about use of Sawmill Road access for logging and log trucking. Conflicts with "declaration of limitations."

The Barber Lot will not be used for forest management access.

How will we protect private property during logging?

Timber sale boundaries and property boundaries are clearly marked and shown to the contractor before harvest operations begin.

Harvesting will occur entirely on Department of Forests, Parks & Recreation (FPR) lands, and no impacts to private land are anticipated or likely. We take great care to avoid any effect on adjoining land. Trees near boundaries that are to be felled are restricted to felling onto FPR land. Brush from felling near boundaries will be lopped to ground level for adjacent residential properties, a tree length buffer between the property line and the harvest boundary is usually implemented. If harvesting near residential areas, we can implement a 200-foot zone of higher density retention unless, as is common, an abutter desires additional sunlight.

Wetland habitats were not properly evaluated and are at risk from proposed projects. Wetlands were identified, and no management activities are proposed within the wetlands or in riparian zones.

As is normal for the planning process, more detailed on-the-ground evaluation will take place prior to each management activity commencement. The more detailed evaluations help to fine-tune the footprint of management activities, and sensitive areas such as wetlands will be identified and avoided appropriately.

Wetland habitats are more carefully reviewed during our Annual Stewardship (Project) Plan review and during preliminary site inspections in a project development phase. The <u>Riparian Management Guidelines for Agency of Natural Resources Lands</u> are designed to protect these features and are followed closely during stewardship activities. None are planned but, in general, activities that pose a risk to wetlands are reviewed by Agency staff with mitigation practices outlined and followed.

The first forestry project area was reviewed by the State Lands Ecologist in the summer of 2017. Based on that field review, a standard 100-foot no disturbance buffer will be in place around the wetlands and water features identified on the ground.

No mention of controlling beaver or milfoil.

Beavers are an integral part of the natural community and ecological function of the lake and wetlands. Beaver activity will be monitored and managed if it poses a threat to infrastructure. Licensed trappers may trap beavers within the legal trapping season as is normal for FPR lands.

According to the monitoring conducted by the Lakes and Ponds section of the Department of Environmental Conservation, the wetland vegetation in Lowell Lake are native species.

We will investigate this further onsite summer 2018. It is probable that the milfoil is native.

Why do we need to do management?

There are many varied and positive reasons for land management. On LLSP, management will accomplish goals for wildlife habitat diversity, invasive plant control, public safety, economic benefits for the state and local community, and public recreation.

How will timber management impact wetlands?

Timber management should have very little to no impact on wetlands. Agency of Natural Resources (ANR) riparian protection guidelines will be followed, and any deviation from that protocol will be vetted through the District Stewardship Team.

What percentage of property will see timber harvests?

In keeping with the Agency and Department mission to promote and practice sustainable forest management on ANR lands, we have scheduled practices here to meet these goals. Out of consideration for aesthetics, recreation, and wetland ecology, these activities are limited to areas where these values will not be negatively impacted. Based on our experience with similar ANR parcels, we anticipate forestry operations will occur over less than one-third of the forest area. Operations will be conducted following ANR riparian management guidelines adopted in 2015 which provide extensive protection for riparian zones and features. We take a close look at each site and refine the proposed harvest boundary for our annual stewardship plan for each harvest to take in to account protection of other resources.

PARK DEVELOPMENT AND VISITOR EXPERIENCE

The park is sometimes overcrowded, and overnight use will exacerbate the situation.

The park does become very busy now on weekends and holidays. We have increased staffing from one part-time park manager a few years ago to a full-time staff of three for 2017. Currently, staff attempt to limit negative impacts to the visitor experience on the busiest days by controlling parking and shutting down the parking lot when full. The parking lot was originally constructed for roughly 15 vehicles; staff carefully direct parking and can fit about 35 vehicles into the park before turning away more vehicles. In 2016, staff reported that visitors had to wait for a parking spot on average no more than 15 minutes with the exception of one day. From late May through late August 2016, the park recorded nearly 7,000 visitors. On July 3, 2016, over 500 visitors were recorded. In 2017 11,600 visitors were recorded from Memorial Day weekend through October 15. Wait times for a parking space on July 3, 2017 exceeded 90 minutes. We anticipate that day use numbers will continue to increase unless more management strategies outlined are implemented. Specifically, increased staffing, day user

fees, a park office, composting toilet, better designed parking, and access control will all benefit the visitor experience. It is anticipated that the management strategies and user fees will curtail the rapid and unchecked rate of attendance increase and help to keep use at more sustainable levels. At current visitation levels, projected day admission fees and season pass sales would offset staffing and operational costs. While there will be additional visitors using the overnight use area, the overnight and day use areas will be separated by use and activity as much as possible. We operate many state parks that offer both day use and overnight use where the uses are separate to varying degrees, compatible, and co-exist well.

Vermont State Parks has extensive experience with managing day and overnight use on waterbodies that previously had minimal or no management. This has been done successfully at Green River Reservoir State Park where visitation has increased but negative impacts have decreased. The same is being done in Mt. Mansfield State Forest at Waterbury Reservoir and at Molly's Falls Pond State Park in Marshfield.

Increased use will damage the park, park resources, and the town cemetery.

The Lowell Lake Cemetery is owned and managed by the Town of Londonderry. The State Park has for many years assisted the Town with maintenance projects at the cemetery including fence replacement, historical gate reconstruction, access for tree removal offsite, and maintaining the foot path to the cemetery. All of these methods of assistance will continue.

The Vermont State Park system has recorded near or above 1 million visitors annually for several years. All parks in the system are managed to protect resources while providing high quality, clean facilities, and pleasant visitor experiences. Lowell Lake will continue to be managed in the same way. Day use in the neighborhood of 12,000 visits per year at Lowell Lake is low in comparison to other day use visits at other parks.

How will environmental and site impacts be monitored?

All management activities and active contracted work are supervised and monitored by staff or contracted project managers on a schedule commensurate with the activity. Visitor impacts are monitored continually by park staff and impacts resulting from the use of LLSP will be monitored more frequently and effectively by an increased staff presence. Post-project forestry practices are examined approximately every two years by forestry staff to evaluate results and fine tune future management.

Not respecting community's wish to protect natural appearance of the Lowell Lake area.

The State recognizes the importance of the aesthetic appeal of the park and will work to retain it. Management and development will be done in accordance with policies and statutes that consider aesthetics. The Shoreline Protection Act prescribes allowable management activities such as developing impervious surfaces and vegetation trimming or removal within 250 feet of the shoreline. In the last 15 years, District I FPR staff have conducted many timber management activities on State lands adjacent to Echo Lake, Gale Meadows Pond, Sweet Pond, Atherton Meadows Pond, Knapp Pond, and Lowell Lake with no negative aesthetic impact and no public complaints regarding the view from the water or shoreline. We have demonstrated our ability to meet aesthetic objectives many times. In addition, much of the developed portion of the park lies in the Town's Shoreland zoning district, which requires site plans to be "designed to

protect water quality and shoreland vegetation, minimize adverse impacts to the lakeshore environment, limit encroachments into public waters, and preserve and enhance visual and physical access to and from the lake."

Powder Mill is prohibited from being visible from the park, Parks should follow same rule.

The goal of the project is to minimize visibility from the lake while providing some limited views from lakeside cabins and the lodge. Typically, if managed views are not provided, experience indicates that park users will gradually trim out views in an unorganized and more impactful manner. LLSP developments will comply with state and local regulations, as previously noted.

Redevelopment of the overnight use area will be in keeping with the historical conditions and within allowable limits of the <u>Shoreline Protection Act</u> and the Town of Londonderry's zoning bylaws.

Can we project the increase use?

While this is difficult to predict, we anticipate that overall attendance will go up with the reintroduction of overnight use; by managing day and overnight use carefully, negative impacts will be avoided. There is a clear upward limit on overnight use based on occupancy and building capacity. There is also a clear upward limit on day use which is rapidly approaching.

Project will dramatically change character of lake experience.

The concepts outlined in the Addendum are generally the same as agreed upon and adopted in the 1999 General Management Plan. A major focus of that plan was to retain the rustic and low-key character of the property and the recreation activities on site. Implementing the activities proposed in the 1999 General Management Plan will be in accordance with the plan and placed emphasis on retaining the character of the property. The next step in researching and investigating the feasibility of overnight use will be to conduct a more thorough development master plan. A significant component of the Master Plan will be to capture the public's concerns, identify areas for opportunities, and create some design proposals that will enable developments to take place in a responsible and reasonable manner. This will happen through an RFP process. There will be an increase in overall park attendance, but the Park will be better staffed, managed, and monitored. Day use will be held within target limits through facility sizing. At this time, the greatest threat to the lake experience is not managing unchecked increased visitation.

More development will pollute the lake and displace loons.

All park redevelopment activities will be in accordance with all state and federal laws that protect rare, threatened, and endangered species. Loons in Vermont are listed as 'uncommon.' In addition, all State water quality regulations will be adhered to. As part of the Agency of Natural Resources, we strive to have our parks serve as models for how construction activity can be undertaken and recreational facilities developed while staying well within the law.

Lowell Lake should be a dog-free park due to the disturbance caused by dogs and the waste left behind.

Dogs are becoming an increasingly complex management issue in many state parks. Use of the park by dog owners may likely require more intense management and tighter control of dogs while recreating in the park. Parks Division management spends significant time analyzing the impacts of dogs on recreation, and the Parks Division is considering making some changes to current dog policies for all parks and has implemented more strict dog policies in some parks. Based on the results of those policy changes, they could be implemented at Lowell Lake.

Old cabins are an eyesore and attractive nuisance and should be removed. New cabins should be constructed to modern building and design standards.

A structural engineering analysis completed in 2015 concluded that re-using the existing cabins will cost significantly more than removing them and constructing new ones. The cabins are part of a historic district, which tells a story unique to the property's past use. Cost will be balanced with historic preservation and accessibility interests when finalizing a plan for cabins. Any re-use of existing structures, or new construction, must meet current life safety and building codes.

Behavior of some current users is unacceptable.

We agree. In recent years, we have seen increasing conflict between visitors and dogs, fishermen and other visitors, and different user groups. In 2015 a staff member was pushed to the ground by someone who was angry about people swimming where the individual wanted to fish. Increased staff associated with management and visitor education should help to alleviate the situation.

2016 and 2017 saw a decrease in the number of reported incidents from 2014 and 2015, with increased attendance. This is likely due to increased staffing.

Proposal for new development is outside scope of original plan and public dialogue of 1998/1999.

Overnight use was a significant component of the 1999 General Management Plan and the 17 public involvement meetings that led to the plan's development. Accordingly, keeping overnight use within the traditional area is acceptable. The projects proposed in the Addendum have been scaled back from the originally approved proposal with the elimination of outdoor camping. The day use area proposal is scaled up due to the increase in use and public demands for semi-developed recreational uses, and we believe it is in the public interest. We recognize that there is concern with the number of overnight units that was used in life cycle cost analysis. The life cycle cost analysis was created to provide an estimate of costs, revenues, and payback for a theoretical model, not an actual plan. The model was used to create a starting point for discussion and budget analysis. The park Master Planning process will examine the feasibility and appropriateness of the numbers and types of lodging units that will balance environmental protection and cultural carrying capacity. The type of lodging offered in the existing cabins cannot be offered again in their original configuration and location due to permitting complexity and cost of infrastructure. For example, each cabin had a kitchenette and a half bathroom. It would be too cost-prohibitive to provide wastewater disposal to every cabin. It is possible that with different configurations, locations, and group units similar to what is provided in other state parks (cabins without plumbing, and cottages with kitchens and bathrooms), efficiency of scale would help to recreate some of the amenities previously

offered. These options, and possibly others, will be examined with more detail in the Master Planning process. The number of units will be the lowest possible to provide the desired recreational experience while providing a scale of economy that makes sense operationally.

Park will provide a location for improper use and crime.

We disagree. Staffed and managed state parks provide an opportunity for recreation where visitors adhere to established rules for conduct. Our parks provide very safe environments for recreation.

There are few settings like LLSP, and it should remain unchanged.

There are relatively few waterbodies in southern Vermont when compared to other parts of the state. The activities proposed are consistent with the original 1999 General Management Plan and will be undertaken to preserve the character of the park. The proposed activities will manage public use carefully rather than let it continue with minimal management or oversight. Redevelopment of the overnight use area, and improvements to the day use area will happen in accordance with the Shoreline Protection Act which limits the amount of vegetation that can be removed and the amount of impervious surface that can be created near a water body.

Parking is insufficient, and more parking could help but could result in other problems. How close to neighbor's property will expanded parking lot be? Access and parking should be plowed for winter use. How will parking lot be built to protect resources?

These concerns will be explored in road and parking lot design considerations. No decision has been made on the parking lot size and, if it will be expanded, to what extent. The primary objective will be to improve parking efficiency and traffic flow. All construction activities will adhere to setbacks required in town zoning bylaws, and in the Shoreline Protection Act, if within the jurisdiction of that law. As previously stated, we intend to demonstrate that we can design facilities that will showcase environmental best practices.

Funding for plowing and sanding would need to be found for winter use, if that is pursued. We support this idea but will need to identify a funding source. The State's Recreational Trail Grant program is one potential source.

Proposal will not enhance the experience for people who currently use the park.

The management strategies outlined will enhance the experience for current users by putting controls on the increasing levels and providing better facilities.

Where will entry to park and contact station be? Will there be a north and south entrance? The existing park entrance will remain the primary park entrance. We will explore creating a separate entrance for overnight use from Little Pond Road during master planning. Multiple entrances increase needed infrastructure and staff, thus increasing costs, which is an operational concern.

When the park is full, you should close to additional users.

Park staff have been actively managing the parking and have limited admittance when it is full. A contact station will make this process more efficient and effective.

Composting toilets are needed.

Agreed. Composting toilets are proposed.

Better parking and access is needed.

Agreed. Improved parking access and flow is proposed.

Old cabins and main buildings should be restored and made available to the public. This would benefit community and local businesses.

That is what a significant portion of the Addendum proposes to accomplish, and it will be fully explored and vetted in the Master Planning process.

Park will result in night time light pollution.

Vermont State Park construction projects incorporate U.S. EPA Dark Sky requirements to minimize light pollution. Our rental cabins all have curtains and none have outside lighting.

The proposal is reasonable and makes needed improvements to park infrastructure.

We agree. That was the intention in the preliminary concepts and will continue to be a primary goal.

FPR is reneging on promises made 20 years ago to maintain low use, low impact, natural character. You should continue to follow present strategy.

All proposed activities are as outlined in the 1999 General Management Plan, with some further restrictions, refinements, and clarity. We are adhering to that plan by providing more detail in how to implement it. The current strategy of minimal management and oversight is not sustainable. The Park Master Plan will provide concrete concepts on how to best move developments forward that both incorporate concerns and operational and visitor needs and recreational demands for services.

Beach access will be unavailable for day users.

Swimming use has increased significantly at the "point" area near the boat launch in recent years. The Master Plan will identify ways to keep informal swimming access available.

Consider remote hike or paddle to campsites along shoreline and/or islands where appropriate on a reservation system. This is use that won't compete with local overnight facilities.

This is a possibility that will be explored if it can be done within permitting requirements at one or two locations of previously existing structures. However, we have committed to removing the concept of a developed outdoor campground to keep the construction footprint within the existing overnight use area.

There are many campgrounds within 10 miles of LLSP that already provide adequate opportunity for overnight camping.

The concept for Lowell Lake's overnight use is very different than a traditional campground. There is great demand for cabins and sheltered camping. In other state parks that have had cabins constructed since 2004, occupancy rates have reached capacity within a few years (75-95%). This has happened with all cabins built across the state over time; from this we infer that there is still unmet demand for cabin rentals in state parks.

Public campgrounds in the vicinity of LLSP do not provide cabins.

In favor of bigger parking lot year round, 'year round tank privy' for back country use and full-time ranger during busy times.

See previous comments relating to parking, composting toilet, and staffing.

A nature center or learning center that is restorative to the spirit would be a good alternative to an overnight campground.

Interpretive programs could be offered at some point in the future in a restored or new building. Programs are valuable enhancements to the full suite of services offered in state parks. Redeveloping and reopening overnight use will meet a significant goal of the 1999 General Management Plan. Interpretive programs would complement overnight use and offer guests an onsite education and entertaining option, reducing the need to travel outside of the park.

None of the proposed projects should occur, and the park should be for local residents only. Limiting access to Vermonters and/or guests or an exclusive subset of the population is contrary to the mission of Vermont State Parks, Agency of Natural Resources, and the State of Vermont. We do not limit use based on residency at any state parks.

ECONOMIC IMPACT

There are sufficient overnight opportunities in the Lowell Lake area. Overnight use will compete with existing facilities.

The overnight experience to be created at LLSP would offer a distinctly different type of lodging from what is currently available in Londonderry and is consistent with offers at other state parks. Overnight guests will bring additional tourism-driven revenue to Londonderry and the surrounding area with restaurant visits, store and fuel purchases, and attraction revenues.

Town will have to pay for policing and other impacts of project.

Vermont State Parks currently maintains the entire length of Ice House Road and could continue to do so under the right circumstances.

State Police provide police coverage. Vermont State Parks are funded primarily through the Parks Special Fund (revenues from state park user fees, timber sales on state park lands, and lease/license fees for use of state lands go to this fund) and not paid by municipalities. It is possible that local fire and rescue services will be needed periodically but based on incidents at other parks with visitation similar to what is projected, that is not anticipated to be more than one or two calls per year.

Redevelopment will detract from use and enjoyment by local population who are already limited by use of non-local people (tourists).

State parks are lands owned by the public and are open for the use of residents and visitors alike. There are currently no restrictions on the use of any Vermont State Parks for visitors based on residency – LLSP included. Local visitors have the same opportunities for recreation that out-of-state visitors have. In many parks, local residents have more access opportunities through the ability to access the park more frequently and with less pre-planning.

Project will redirect capital from other more important uses.

Vermont State Parks receives funding from three sources. Operationally, the vast majority of our budget comes from the Parks Special Fund (which receives revenue from park user fees and fees and proceeds from other activities on State lands) and a small percentage of the state General Fund. Vermont State Parks receives Capital funds on an annual basis along with all the other parts of state government for infrastructure improvements with a life span of at least 20 years. Vermont State Parks has an established track record of managing many capital improvement projects across our park system and prioritizing capital improvements. We have consistently prioritized construction based on need and economic impact. The plans at Lowell Lake fit well into our capital construction plans to revitalize infrastructure and provide new opportunities for visitors while providing a reasonable return on investment. Large capital investment projects may be matched with grant opportunities, such as the Federal Land and Water Conservation Fund, or with donations.

Overnight use is economically infeasible.

All proposed redevelopment activities have been budgeted using an established Life Cycle Cost Analysis template and construction cost estimates based on recent projects around the Vermont State Parks system. Through the Master Planning process, the Life Cycle Cost Analysis will be updated to reflect proposed conceptual developments outlined. All proposed infrastructure improvements would have to stay within reasonable limits for cost and life cycle payback.

Traffic is excessive and damaging and overnight use will exacerbate. Will State fund town road maintenance? Is there a traffic impact study being done?

We have not been provided with any evidence or documentation that traffic to the park is damaging town infrastructure or is excessive. Currently, the State Park maintains Ice House Road, a class 3 and class 4 town highway. Future discussion with the Town is anticipated on this issue.

Increased use of lake will lead to increased use of town roads and be a burden to the Town. Increased use of the park will result in more traffic on Lowell Lake Road. It is not clear how this will place a burden on the Town. The State already maintains Ice House Road at its own expense.

Put cabins in other larger existing parks. Locally there are inns, B&Bs, motels, etc. the public can use.

Cabins are being strategically constructed throughout the Vermont State Park system to meet demand. Cabins will provide a very different experience than a bed & breakfast or a motel, in a completely different setting.

Will a day use fee be charged for dog walking?

Day use fees will be charged for all day activities during the operating season mid-May through mid-October. This includes hiking and walking. Currently there is not a day fee for dogs. All use would be free at all other times of the year.

What will revenues be used for? Can they be directed to specific projects?

Park fees go into the Parks Special Fund which supports the operation and day-to-day maintenance of the Vermont State Parks system.

Funds should be invested in improving the beach.

Day activities will be focused around the current day use area. It was strongly voiced in the mid-1990's public involvement that no beach development should take place. We do not propose making any beach development or improvement primarily because it goes against the character of the Park, would be highly unlikely to obtain permitting, and is counter to current ANR policy.

Petition.

As part of the public involvement and during the comment period, we received a petition signed by 137 people. The petition specifically opposed the rehab and overnight use of the cabins, the spending of the estimated \$2.85 million at Lowell Lake, and implementing a day use fee. It also states that they believe the LRMP is in "direct conflict" with FPR's mission statement.

FPR was very pleased with the level of public involvement displayed by concerned citizens during the LRMP public involvement process. While understanding the concerns expressed by local users, FPR has the responsibility to provide the public high quality, safe recreational opportunities while protecting natural resources. Lowell Lake currently lacks sufficient staffing and infrastructure to achieve this. FPR believes long-term conservation of all the resources at LLSP can be accomplished through a comprehensive Master Planning process that will outline thoughtful development, and the natural resource management actions described in the LRMP Addendum.