

MEMORANDUM

Maine Natural Areas Program

Department of Agriculture, Conservation and Forestry
State House Station #177, Augusta, Maine 04333

Date: April 24, 2019

To: Jay Clement, US Army Corps of Engineers

From: Kristen Puryear, Ecologist

Re: Rare and exemplary botanical features, NAE 2017-01342, Central Maine Power, New England Clean Energy Connect, Beattie Twp to Lewiston, Maine.

I have searched the Maine Natural Areas Program's Biological and Conservation Data System files for rare or unique botanical features in the vicinity of the proposed site in response to your request received March 26, 2019 for MNAP's comments on the project.

According to our current information, the features listed in Table 1 below are within or immediately adjacent to the proposed project area. The Maine Natural Areas Program has had an ongoing discussion with the applicant and their consultants about these features and any required compensation measures. Mitigation in the form of minimization or compensation is described in the CMP Compensation Plan dated January 30, 2019. While the majority of the proposed compensation for rare and special botanical features has been found to be acceptable by MNAP, in late March the applicant introduced two alternative compensation options, which are currently under review. These involve the Small Whorled Pogonia occurrence (*Isotria medeoloides*, Listed Threatened Federally) and the two S1 – Critically Imperiled Jack Pine Forest occurrences. Discussions regarding the Small Whorled Pogonia occurrence have included consultation with the Maine office of the U.S. Fish and Wildlife Service.

Please note, an Invasive Species Control Plan (ISCP) has not been provided for the proposed project for review, nor has any guidance been shared on the process for creating an ISCP in terms of pre- and post-construction monitoring, technical input, and/or mitigative measures which will be particularly important in the area of new corridor development through Segment 1. Our general knowledge of and experience working in that region suggests that invasive plants are likely either absent or localized and minimal under current conditions.

For further information on the status of the review of this project, feel free to contact me at (207) 287-8043.

Table 1: Rare botanical features known to occur within or immediately adjacent to the proposed project area.

Feature	State Status	State Rank	Global Rank	Occurrence Rank	Acres w/in clearing limits	Notes
Boreal bedstraw (<i>Galium kamtschaticum</i>)	SC	S2	G5	A Excellent	N/A	Peaked Mountain
Boreal bedstraw (<i>Galium kamtschaticum</i>)	SC	S2	G5	B Good	N/A	Tumbledown Mountain North Slope
Clinton's Bulrush (<i>Tricophorum clintonii</i>)	SC	S3	G4	C Fair	0.01	ROW near Chase Stream, Moscow

Feature	State Status	State Rank	Global Rank	Occurrence Rank	Acres w/in clearing limits	Notes
Dry land sedge (<i>Carex siccata</i>)	SC	S2	G5	BC Good-Fair	N/A	Androscoggin Rivershore, Lewiston
Enriched Northern Hardwoods Forest (<i>Maple-Basswood-Ash Forest</i>)	N/A	S3	GNR	B Good	2.9	Robinson's Way Moxie Gore
Goldie's Wood Fern (<i>Dryopteris goldiana</i>)	SC	S2	G4G5	CD Fair-Poor	0.09	ROW South of Deadwater Radar Station
Jack Pine Forest	N/A	S1	G4G5	E Extant	3.37	East of Horse Brook, Bradstreet Twp
Jack Pine Forest	N/A	S1	G4G5	E Extant	2.67	South of Bitter Brook, Bradstreet Twp
Long-leaved Bluet (<i>Houstonia longifolia</i>)	SC	S2S3	G5TNR	B Good	0.18	Wyman Dam
Red-stemmed Gentian (<i>Gentiana rubricaulis</i>)	T	S1	G4?	B Good	0.11	ROW South of Jackson Pond Road, Concord
Red-stemmed Gentian (<i>Gentiana rubricaulis</i>)	T	S1	G4?	B Good	0.08	ROW South of Beaudoin Road, Moscow
Slender False Pimpernel (<i>Lindernia dubia</i> var <i>anagallidea</i>)	T	S1	G4?	CD Fair-Poor	0.01	ROW South of Plaisted Road, Jay
Small whorled pogonia (<i>Isotria medeoloides</i>)	E, ME LT, Fed*	S2	G2?	E Extant	0.04	CMP ROW West of Allen Pond, Greene
Upper Floodplain Hardwood Forest (<i>Hardwood River Terrace Forest</i>)	N/A	S3	GNR	CD Fair-Poor	0.34	ROW North of Hunton Brook, Livermore Falls
Upper Floodplain Hardwood Forest (<i>Hardwood River Terrace Forest</i>)	N/A	S3	GNR	CD Fair-Poor	0.56	Carrabassett River, Anson
Wild Leek (<i>Allium tricoccum</i>)	SC	S3	G5	D Poor	0.11	ROW at Mouth of Carrabassett River, Anson

*Endangered in Maine, Listed Threatened Federally

This finding is available and appropriate for preparation and review of environmental assessments, but it is not a substitute for on-site surveys.

Comprehensive field surveys do not exist for all natural areas in Maine, and in the absence of a specific field investigation, the Maine Natural Areas Program cannot provide a definitive statement on the

presence or absence of unusual natural features at this site. You may want to have the site inventoried by a qualified field biologist to ensure that no undocumented rare features are inadvertently harmed.

The Maine Natural Areas Program is continuously working to achieve a more comprehensive database of exemplary natural features in Maine. We welcome the contribution of any information collected if a site survey is performed.

Thank you for using the Maine Natural Areas Program in the environmental review process. Please do not hesitate to contact our office if you have further questions about the Maine Natural Areas Program or about rare or unique botanical features at this site.