

MEMORANDUM

Maine Natural Areas Program

Department of Agriculture, Conservation and Forestry
State House Station #93, Augusta, Maine 04333

Date: December 12, 2017

To: James Beyer, DEP

From: Kristen Puryear, Ecologist

Re: Rare and exemplary botanical features, DEP Application L-27625-26-A-N/27625-TG-B-N/27625-2C-C-N/27625-VP-D-N/27625-IW-E-N, NECEC Transmission Line & Substation, Beattie Twp to Pownal and Windsor to Wiscasset, Maine.

I have searched the 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 October 18, 2017 for our agency's comments on the project.

According to our current information, there are several rare botanical features documented on or within 1000 feet of the proposed NECEC transmission line referenced in DEP Application L-27625-26-A-N/27625-TG-B-N/27625-2C-C-N/27625-VP-D-N/27625-IW-E-N (Table 1).

A significant portion of the NECEC transmission line passes through undeveloped forested areas that have not been surveyed for significant botanical features. Landscape analysis and subsequent field surveys by a qualified field biologist within previously un-surveyed portions of the project area are strongly recommended, as described in section 9.1 and 9.2.2 of the Site Location of Development Application. Additionally, it is recommended that the sites identified for survey are reviewed by MNAP to ensure survey effort is applied to all areas with potential for significant botanical features.

Table 1: Botanical features documented within 1000 feet of the proposed NECEC transmission line

Feature	State Status	State Rank	Global Rank	Occurrence Rank	Site Name	Town
Black Spruce Barren	N/A	S2	G5	C Fair	Moore Pond	Bradstreet Twp
Boreal Bedstraw <i>Galium kamtschaticum</i>	SC	S2	G5	A Excellent	Peaked Mountain	Skinner Twp
Dry Land Sedge <i>Carex siccata</i>	SC	S2	G5	BC Good to Fair	ROW at Androscoggin River	Lewiston
Enriched Northern Hardwoods Forest	N/A	S3	GNR	H Historical	Farmington Woods	Farmington
Long-leaved Bluet <i>Houstonia longifolia</i>	SC	S2S3	G4G5TNR	B Good	Wyman Dam	Concord Twp, Moscow
Red-stemmed Gentian <i>Gentiana rubricaulis</i>	T	S1	G4?	B Good	ROW South of Jackson Pond Road	Concord Twp
Spruce – Fir – Northern Hardwoods Ecosystem	N/A	S5	GNR	B Good	Cold Stream Forest	West Forks Plt
Upper Floodplain Hardwood Forest	N/A	S3	GNR	C Fair	Kennebec River, Bingham Islands/Austin Brook	Bingham

Table 1-continued:

Feature	State Status	State Rank	Global Rank	Occurrence Rank	Site Name	Town
Upper Floodplain Hardwood Forest	N/A	S3	GNR	CD Fair to Poor	Carrabassett River	Anson
Wild Leek <i>Allium tricoccum</i>	SC	S3	G5	D Poor	ROW at Mouth of Carrabassett River	Anson
"Basswood -Ash-Red Maple Floodplain Forest" (Upper Floodplain Hardwood Forest?)*	N/A	S3	GNR	Unknown	Unknown	Livermore Falls
Pale Green Orchis* <i>Platanthera flava</i>	SC	S2	G4T4Q	Unknown	Unknown	Wiscasset
Fall fimbry* <i>Fimbristylis autumnalis</i>	T	S2S3	G5	Unknown	Unknown	Lewiston region

*Rare feature observations from CMP's MPRP field surveys, 2007-2009; not confirmed by MNAP

In addition, much of the NECEC transmission line area passes through current corridors that were surveyed as part of CMP's Maine Power Reliability Program (MPRP) in 2007-2009. The rare features documented at that time are now eight to ten year-old records. It is therefore recommended that the features documented at that time be resurveyed to confirm their continued presence, evaluate their condition, and/or re-map any changes to the feature or population area (Table 2). Furthermore, several botanical features directly intersect the ROW corridor. A resurvey is recommended for those features to evaluate potential impacts (Table 2). We recommend that the rare plant sites be inventoried by a qualified field biologist to ensure that no undocumented rare features are inadvertently harmed. Rare natural communities on or near (within 250') of the project area should be updated with consultation by an MNAP Ecologist.

Table 2: Documented botanical features for re-survey.

Feature	Site Name	Town	Status
Black Spruce Barren	Moore Pond	Bradstreet Twp	Update needed
Boreal Bedstraw <i>Galium kamtschaticum</i>	Peaked Mountain	Skinner Twp	Update needed
Dry Land Sedge <i>Carex siccata</i>	ROW at Androscoggin River	Lewiston	Intersects ROW
Enriched Northern Hardwoods Forest	Farmington Woods	Farmington	Update needed
Long-leaved Bluet <i>Houstonia longifolia</i>	Wyman Dam	Concord Twp, Moscow	Intersects ROW
Red-stemmed Gentian <i>Gentiana rubricaulis</i>	ROW South of Jackson Pond Road	Concord Twp	Intersects ROW
Upper Floodplain Hardwood Forest	Carrabassett River	Anson	Intersects ROW
Wild Leek, <i>Allium tricoccum</i>	ROW at Mouth of Carrabassett River	Anson	Intersects ROW
"Basswood -Ash-Red Maple Floodplain Forest" (Upper Floodplain Hardwood Forest?)*	Unknown	Livermore Falls	Update/confirmation needed
Pale Green Orchis* <i>Platanthera flava</i>	Unknown	Wiscasset	Update needed
Fall fimbry* <i>Fimbristylis autumnalis</i>	Unknown	Lewiston region	Update needed

*Rare feature observations from CMP's MPRP field surveys, 2007-2009; not confirmed by MNAP

Given that landscape analysis and field surveys are not specifically planned by the applicant as part of the permit application prior to any award of a permit, MNAP has serious concerns both about getting assurance that these tasks will be completed and about what kind of follow up (e.g. avoidance, minimization, or compensation) process will be required if it is found that there will be impacts to any new or previously documented rare plants or rare and exemplary natural communities. MNAP requests further information about what type of language or mechanism will be in place as part of the permit, if it is awarded, to address these concerns.

All results of surveys on all sections of the project area should be shared with MNAP for consultation of potential impacts from the proposed project, and for follow up survey by an MNAP Ecologist if warranted, to verify feature(s) and/or discuss appropriate avoidance or mitigation actions (as referenced in section 9.2.1 of the Site Location of Development Application).

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.

The Natural Areas Program is continuously working to achieve a more comprehensive database of exemplary natural features in Maine. We strongly encourage the contribution of any information collected from field surveys completed for this project.

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