#### Atlantic Resource Co, LLC

PO Box 76 Bass Harbor, ME 04653 Tel 207.944.7288 roger@arc-env.com

www.arc-env.com



Consulting Botanist/Ecologist 9 Cedar Avenue Bar Harbor, ME 04609 207-288-3250 jill.weber@roadrunner.com

**SEPTEMBER 22, 2019** 



Three Rivers Solar Power, LLC/Swift Current Energy 184 High Street, Suite 701 Boston, MA 02111 Via email:





RE: Three Rivers Solar Project, T16MD, Maine-Rare, Threatened, and Endangered Plant Survey:

Dear Dave,

Atlantic Resource Co, LLC (ARC) and Weber Ecological Services (WES) have completed surveys for rare, threatened, and endangered (RTE) plant species to support state permitting efforts for the Three Rivers Solar Power project in Township16 MD. The survey covered 6 areas totaling approximately 600 acres. Surveys were conducted during July, August and September of 2019. One state listed species, Canada Mountain Rice Grass (Piptatherum canadense) was observed in the project area. This species is currently listed as "S2" by the Maine Natural Areas Program (MNAP). The enclosed report outlines the findings of the survey. We very much appreciate the opportunity to provide this report and please contact us with any questions or for further information.

Sincerely,

Roger St. Amand, CSS, LSE, LPF, CPESC, PWS

Principal | Atlantic Resource Co, LLC

Jill E. Weber

Consulting Botanist | Weber Ecological Survey





### Rare, Threatened, and Endangered Plant Survey at the Three Rivers Solar Project Site

#### **T16 MD**

#### **Purpose**

Weber Ecological Services was contracted to conduct a botanical survey to detect the presence of rare, threatened, and endangered (RTE) plant species as part of pre-permitting work at the Three Rivers Solar (TRS) site in T16 MD, Maine. TRS plans to install a 100-MW solar array on this ~600-acre site, see Sheet B-1 attached.

#### **Study Site**

Much of the project site was forested until about 10 years ago, when the landowner harvested the trees. The landowner created a transitional habitat by clearing vegetation, removing large boulders, conducting some grading that created bare soils, and applying herbicide treatments in the conversion of the land to blueberry production. Current herbicide treatments employ glyphosate applied with a wand at a height that kills taller woody plants but avoids contact with most herbaceous species. The TRS project site includes 6 areas, each of which has a gravel perimeter road, See Sheet B-2 Overview. Area 1 (the largest, at about 350 acres) has been the focus of the practices outlined above; thus, it is the most disturbed and open portion of the site, with the sparsest vegetation. Although there is some patchiness, Lowbush Blueberry (*Vaccinium angustifolium*) is dominant here. There is also fairly extensive cover by Sheep Laurel (*Kalmia* 





angustifolia). Flattened Oatgrass (*Danthonia compressa*), Fireweed (*Chamerion angustifolium*), Rough Rice Grass (*Oryzopsis asperifolium*), and bentgrasses (*Agrostis* spp.). Areas 2 and 3 (41 acres and 35 acres, respectively are less open, but still without extensive woody plant growth. The same species are associated, but there are more maple (*Acer* spp.), birch (*Betula* spp.), and Red Oak (*Quercus rubra*) stump sprouts. Areas 4 and 5 (23 acres and 26 acres, respectively) support a greater proportion of woody vegetation, most of which is ~15-foot-tall regrowth of stump sprouts from previously harvested hardwood species, mainly birch and maple. In addition, there is a drainage channel through Area 5 that supports typical poor fen species, including Woolgrass (*Scirpus cyperinus*), Rhodora (*Rhododendron canadense*), and Northern Long Sedge (*Carex folliculata*). Area 6 has a mixture of low and tall-shrub dominated vegetation, the northern portion of which has dense growth of Beaked Hazelnut (*Corylus cornuta*). (Fig. 2). There are some mapped wetlands on the site, but most of them are small and seasonal. The topography undulates with many low ridges and knobs.

Most rare plant species do not occur in the disturbed habitats present at the TRS site. However, a few species have been documented in disturbed areas, including: Canada Mountain Rice Grass (*Piptatherum canadense*), Dusky Sedge (*Carex adusta*), Dawnland Sedge (*Carex waponahkikensis*), and Allegheny Vine (*Adlumia fungosa*). Fact sheets about each of these species are available at the Maine Natural Areas Program (MNAP) website (<a href="https://www.maine.gov/dacf/mnap/features/rare\_plants/plantlist.htm">https://www.maine.gov/dacf/mnap/features/rare\_plants/plantlist.htm</a>). MNAP maintains Maine's rare plant list and tracks RTE locations; there are no records of any RTE species within more than a mile of the site (MNAP, pers. comm.).





#### **Methods**

Surveys consisted of parallel transects across each of the 6 areas at the site to detect the presence of RTE plants. Transects were located close enough together to allow all portions of the site to be visually examined; they were closer in areas with more woody vegetation where visibility was lower. Canada Mountain Rice Grass and Allegheny Vine are identifiable in the field. Dusky Sedge and Dawnland Sedge are in a cryptic group of sedges (Cyperoidae) and are more difficult to discern. We collected specimens of any sedges whose identity was in doubt and used a microscope to examine them in the office. Field crews used submeter Trimble GPS units to map occurrences of rare species observed for later mapping in GIS, along with supplemental mapping grade GPS units for navigation. If plants occurred individually, we mapped them as points. If several plants occurred near each other, we counted the number of stems present and used GPS to create a polygon around the area. We followed the nomenclature in Arsenault et al. (2013) for sedges, Mittelhauser et al. (2019) for grasses, and Native Plant Trust (2019) for all other plants.

#### **Results**

We documented occurrences of Canada Mountain Rice Grass in all 6 areas within the project boundaries, but detected no other RTE species. We recorded thousands of Canada Mountain Rice Grass stems in the project area; some as individual plants and some as patches dispersed within discreet areas (mapped within polygons). In all, we determined that Canada Mountain Rice Grass covered approximately 25 acres. See Appendix A for a report specific to Canada Mountain Rice Grass.





It was impossible to characterize the preferred habitat of this species because it occurred so widely. The common factor among all occurrences was the absence of a closed woody canopy. Thus, even in area 5, where canopy cover was nearly 100%, we observed Canada Mountain Rice Grass in a few small openings where herbaceous species were dominant. It appeared to have no preference for exposure or topographic position.

Despite extensive searches in all portions of the project site, we detected no other RTE species. Our surveys occurred in mid- to late summer, when it is best to identify Dusky Sedge, Dawnland Sedge, and Canada Mountain Rice Grass. Although Allegheny Vine blooms earlier in the year, the foliage would have been persistent, and the growth habit would have allowed differentiation between it and the closely related common species, Pale Corydalis (*Capnoides sempervirens*), which grows on the site. We searched specifically for Dusky Sedge, Dawnland Sedge, Canada Mountain Rice Grass, and Allegheny Vine, but we would have documented any RTE plant species encountered; none were observed.

#### **Discussion**

The project site has been subject to ongoing human disturbance in the form of forestry, fire, grading, herbicide application, and road-building. These practices have created a large expanse of what would naturally be a transitional habitat. If the current management regime continues, forest development will be prevented and the disturbed nature of the site will persist, thus maintaining habitat for the rare Canada Mountain Rice Grass.





In Maine, Canada Mountain Rice Grass is ranked S2 (imperiled because of rarity: 6–20 occurrences or few remaining individuals or acres or because of other factors making it vulnerable to further decline) and is listed as a Special Concern species (rare in Maine, based on available information, but not sufficiently rare to be considered Threatened or Endangered; Maine Natural Areas Program 2013). Maine supports 8 documented Canada Mountain Rice Grass populations, excluding the occurrence at the Three Rivers Solar site. The MNAP fact sheet for this species says that the reasons for the rarity of this species are, "unclear; some locations are located in blueberry barrens which are historically not popular botanizing sites", suggesting that the species might be more common than we know because there is abundant habitat in Maine, but most of it has not been surveyed. Indeed, what appears to be an aggressive disturbance regime has resulted in the largest population of Canada Mountain Rice Grass that we have seen.

The proposed solar panel installation would provide a higher likelihood of habitat maintenance and Canada Mountain Rice Grass survival than blueberry production or reforestation. In the current project design, panel rows are separated by at least 12 feet, which will allow some patches of the grass to remain undisturbed and still receive full sun following installation. There will be no ground disturbance during the solar panel installation, except placement of support posts and burying of electrical lines between the panels. The management plan for areas underneath and between the panels includes mowing, and/or continued glyphosate treatments to taller woody vegetation, which maintains the current management regime, thus, conserving Canada Mountain Rice Grass. The panels will be of sufficient height and angle that there will be some light penetration to ground level. Recent research shows that many species grow





successfully under solar panels and that the presence of native vegetation can benefit native organisms and even adjacent habitats (Jossi 2018, NPR 2019). It is likely that Canada Mountain Rice Grass will persist under installed panels if a similar management regime is maintained, as is planned under the current design scenario.





#### **Literature Cited**

- Arsenault, M., G.H. Mittlehauser, D. Cameron, A.C. Dibble, A. Haines, S.C. Rooney, and J.E. Weber. 2013. Sedges of Maine: A Field Guide to Cyperaceae. University of Maine Press, Orono, ME. 712 pp.
- Maine Natural Areas Program. 2013. Canada Mountain Rice Grass fact sheet. Available online at <a href="https://www.maine.gov/dacf/mnap/features/pipcan.html">https://www.maine.gov/dacf/mnap/features/pipcan.html</a>.
- Mittelhauser, G.H., M. Aresenault, D. Cameron, and E. Doucette. 2019. Grasses and Rushes of Maine. University of Maine Press, Orono, ME. 747 pp.
- Native Plant Trust. 2019. Go Botany. Available online at <a href="https://gobotany.nativeplanttrust.org/">https://gobotany.nativeplanttrust.org/</a>.

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# Appendix A. Canada Mountain Rice Grass (*Piptatherum canadense*) at the Three Rivers Project Site, T16 MD, Maine

#### **RTE Survey**

Weber Ecological Services was contracted to conduct a botanical survey to detect the presence of rare, threatened, and endangered plant species at the Three Rivers Solar site in T16 MD, Maine. The project area is ~600 acres in extent. Surveys consisted of parallel transects across each of the 6 areas at the site to detect the presence of rare, threatened, and endangered plants. Rare species likely to occur in this habitat include Canada Mountain Rice Grass (*Piptatherum canadense*), Dusky Sedge (Carex adusta), Dawnland Sedge (Carex waponahkikensis), and Allegheny Vine (Adlumia fungosa). We began our survey in the southwest portion of the site (Area 6) and observed that Canada Mountain Rice Grass (CMRG), Piptatherum canadense (Poiret) Dorn (Poaceae), was widely distributed throughout the area, see Sheet B-3-RTE). We mapped the first few stems, then began drawing polygons around large occurrences via GPS. As the survey continued across the parcel, we found CMRG in each of the 6 areas. In all, we encountered thousands of stems of this species. Approximately 30 habitat areas or polygons totaling approximately 25 acres and approximately 75 individual point-locations were mapped. Point features included 1-10 plants in a distinct cluster, typically in an area less than 5-10 meters in diameter. Larger contiguous areas were mapped and characterized by relative density of plants. Low-density areas had occasional plants separated and scattered by 10 meters or more throughout but too dense to map individually. Medium-density areas included denser patches and





sporadic individuals with less than 10 meters between individual plants. High-density areas had plants and clumps of plants that covered more than 25% of the immediate location.

# Canada Mountain Rice Grass (*Piptatherum canadense*) Distribution, Abundance, and Natural History in Maine

Canada Mountain Rice Grass is a perennial grass that occurs from the Canadian Maritime Provinces to western Canada and extends southward into northern New England and the northern Midwest. Despite its broad occurrence, it is ranked as rare in 12 of the 15 states or provinces in which it has been documented. In New England, this species occurs only in Maine and New Hampshire, with most of the extant and historic occurrences in Washington and Hancock counties of Maine (Lapin 2004). In Maine, it is ranked S2 (imperiled because of rarity: 6–20 occurrences or few remaining individuals or acres or because of other factors making it vulnerable to further decline) and is listed as a Special Concern species (rare in Maine, based on available information, but not sufficiently rare to be considered Threatened or Endangered; Maine Natural Areas Program 2013). Maine supports 8 documented CMRG populations, excluding the occurrence at the Three Rivers Solar site.

This species tends to grow in nutrient-poor areas with well-drained soils, and appears well-adapted to disturbance (either natural, e.g., fire, or anthropogenic, e.g., blueberry cultivation conditions; Lapin 2004). CMRG "grows most often in open, frequently disturbed, acidic, sandy habitats, with ericaceous shrubs and open-canopy pine or spruce forest. The southernmost habitats are openings in dry, recently burned, or otherwise disturbed woods, or shrub heaths.





Populations are known from eskers with open forest, edges of blueberry (*Vaccinium*) fields, Pitch Pine (*Pinus rigida*) plains, a river shore, and high, mountain slopes with much bare rock and talus." (Lapin 2004). Although eastern Maine (Hancock and Washington counties) has abundant habitat seemingly appropriate for CMRG, the species only occurs at very few sites.

Canada Mountain Rice Grass requires frequent disturbances that create areas of bare soil, which reverse successional changes to the vegetation. Natural disturbance regimes have been interrupted or halted by fire suppression and cultivation practices. However, some management protocols, such as periodic burning for blueberry cultivation, have likely benefitted the species. Indeed, we suggest that is the case at the Three Rivers Solar site.

#### **Site History and Management Practices**

Until about 10 years ago, much of the project site was forested, when it was harvested by the landowner for future agricultural production of lowbush blueberry. The current management practices have created a transitional habitat by clearing vegetation, removing large boulders, conducting some grading that created bare soils, and applying herbicide treatments in the conversion of the land to blueberry production. Current herbicide treatments employ glyphosate applied with a wand that is likely at a height sufficient to avoid contact with the grass, but which appears to control competing vegetation. CMRG is favored by this regime. If the landowner halted the conversion to agricultural land and herbicide treatments, the site would return to forest. Conversely, if the parcel were actively managed for blueberry production, additional broad-spectrum herbicides would be used to specifically target grass species that compete with





the preferred crop. Either of these scenarios would likely result in near or total elimination of CMRG at this site.

#### Canada Mountain Rice Grass Conservation Post-installation at the Project Site

The proposed solar panel installation would provide a higher likelihood of habitat maintenance and CMRG survival than either blueberry production or reforestation. In the current project design, panel rows are separated by approximately 15 feet, which provides for a high likelihood that patches of the grass will be undisturbed and in full sun to partial shade. There will be only minimal ground disturbance during the solar panel installation, except placement of support posts and burying of electrical lines between the panels, and a small area required for a substation located in Area 6. The management plan for areas underneath and between the panels includes mowing, and/or continued glyphosate treatments to taller woody vegetation, which maintains the current management regime, thus, conserving CMRG. The panels will be of sufficient height and at enough of an angle that there will be good light penetration to ground level. Recent research shows that many species grow successfully under solar panels and that the presence of native vegetation can benefit native organisms and even adjacent habitats (Jossi 2018, NPR 2019). It is likely that CMRG will persist under installed panels if a similar management regime is maintained, as is planned under the current design scenario.





#### **Literature Cited**

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Maine Natural Areas Program. 2013. Canada Mountain Rice Grass fact sheet. Available online at <a href="https://www.maine.gov/dacf/mnap/features/pipcan.html">https://www.maine.gov/dacf/mnap/features/pipcan.html</a>. National Public Radio (NPR).

2019. All things Considered, 1 September 2019. Available online at <a href="https://www.npr.org/programs/all-things-considered/">https://www.npr.org/programs/all-things-considered/</a>. Accessed 1 September 2019.





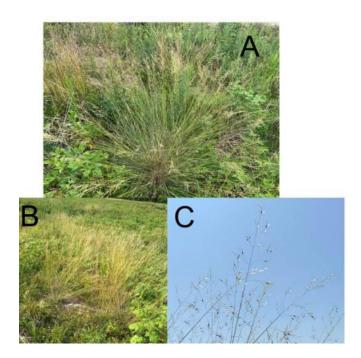


Figure 1. Canada Mountain Rice Grass. A. Single plant. B. Several plants. C. Close-up of fruiting structures.

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### SPECIAL PLANT SURVEY FORM

Site:	Three Ri	ivers Solar Projec	et	Survey Site:	T1	6 MD		
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Plant Name: Pip	tatherum ca	nadense			⊠ New			
Date: August 201	9 Surve	yor(s): Jill Weber, Rog	ger St. Aman	d		Sourcecode	(MNAP assigns):	
Primary Surveyor 04609	Address: 9 C	Cedar Avenue, Bar Har	bor, ME	Phone: 207-460-7	7250	Email: jill.w	veber@roadrunner.com	
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<u>Locational Uncertainty</u> (how closely can you map the feature to its actual location?)								
Mapped to w/in 12.5 m of actual location; ☐ greater uncertainty (estimate = ☐ m / ☐ft / ☐km / ☐miles); ☐ aerial delimited								
		on of Population Ex						
☐ Confident fu	ll extent of fe	eature <b>IS</b> known;	Confident fu	ill extent is <b>NOT</b> ki			n whether full extent is known	
EO DATA		Phenology	Population	Area			Other than normal remely vigorous and numerous	
# of Plants thousa	ınds	☐ In leaf ☐ In bud	☐ 1 square yard ☐ 1 – 5 square yards			compared to populations in other Maine locations.		
☐ Individuals				EV		Evidence disease, predation, etc? Explain:  Yes		
—	Ramets					□ 1es ⊠ No		
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	Apparently l	land management pract			ditions f	or this species	s. Woody plant cover is low, thus enh	
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are being prepared	d for lowbush	blueberry cultivation.						
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		ed to moderatley well d	rained sandy	loam tills, Peru, N	Iodnano	ck soil series,		
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⊠ Yes			Are there identification issues? ⊠ No; ☐ Yes; Explain							
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E.J. Jordan & Sons		Tax map # (if kn	own)	Is landowner protecting plant?  Yes No						
		Lot # (if known)		Comments						
EO RANKING										
CURRENT CONDITIO	N of the plant's immediate habita	at. Is the habitat pristine or de	egraded? Note an	y disturbances within the plant						
	be below to what degree these have			y have any negative or positive						
effects on the population).	. Note how the disturbance(s) ma	ay influence success of the plant	ant at the site.							
□ Logging-most recently     □ Agriculture / Pasture     □ Animal effects (insect	<ul><li>☑ Fire</li><li>☐ Impoundment</li><li>☐ Exotic plants</li></ul>	☐ Dumping or mining ☐ ORV / Vehicle disturbance ☐ Trails / Roads								
Wind or ice damage		Erosion								
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Condition	pparent signs of human disturbanc	re (or long enough ago that et	fects are no longe	er visible or are extremely minor)						
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<ul> <li>C − Signs of human disturbance or degradation, and habitat compromised in some significant way</li> <li>D − Highly disturbed (multiple impacts causing habitat to be drastically altered)</li> </ul>										
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Figure 1. Piptatherum canadense photo 1



Figure 2: Piptatherum canadense photo 2 close-up of inflorescence



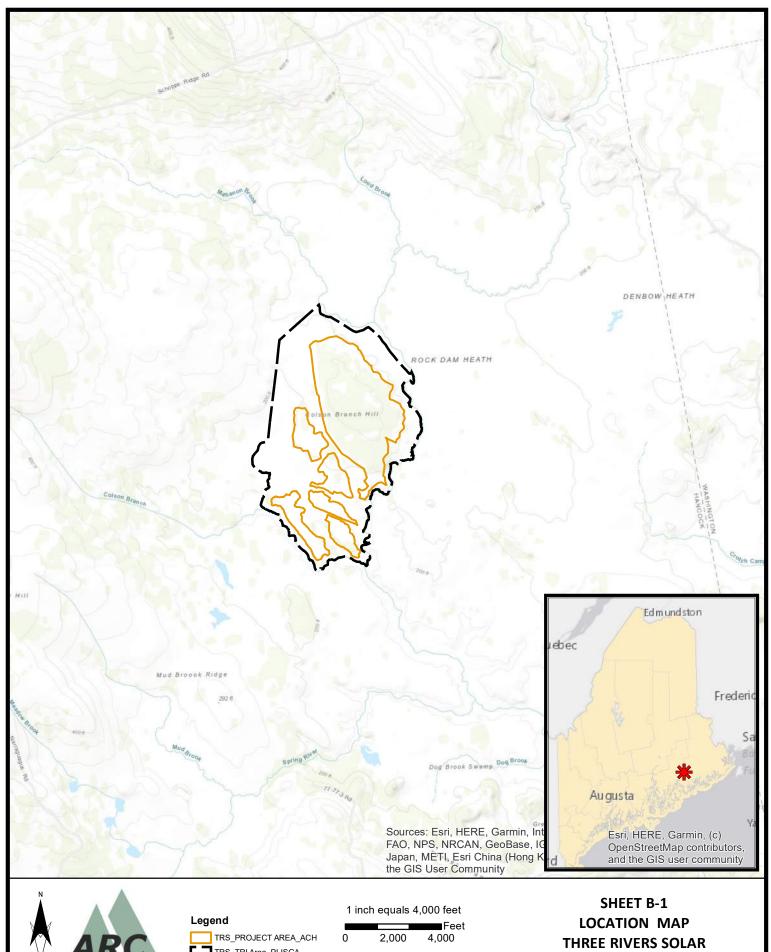
Figure 3: Piptatherum canadense photo 3, typical habitat



Figure 4: Piptatherum canadense photo 4



Figure 5: Piptatherum canadense photo 5, patch of multiple plants

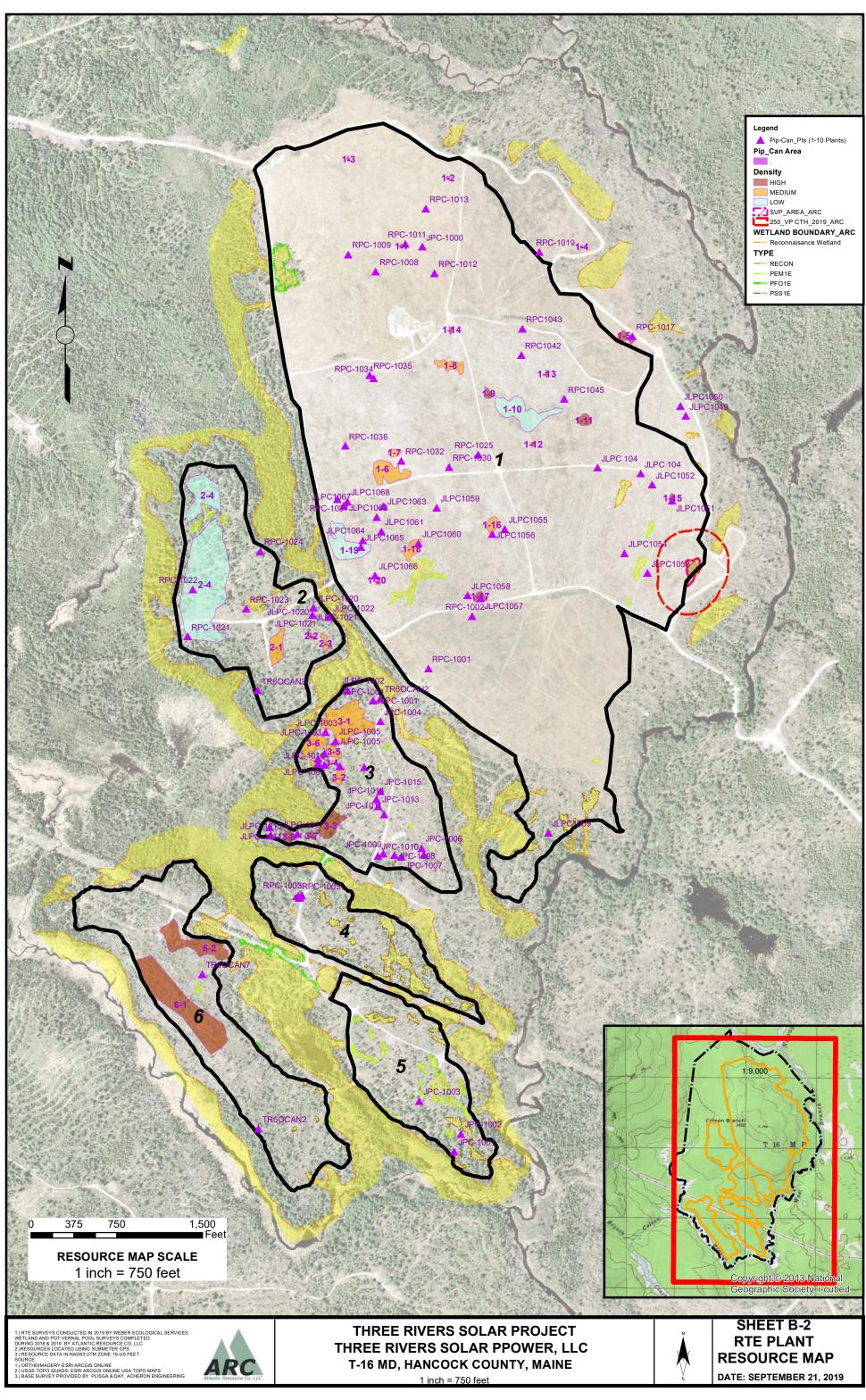


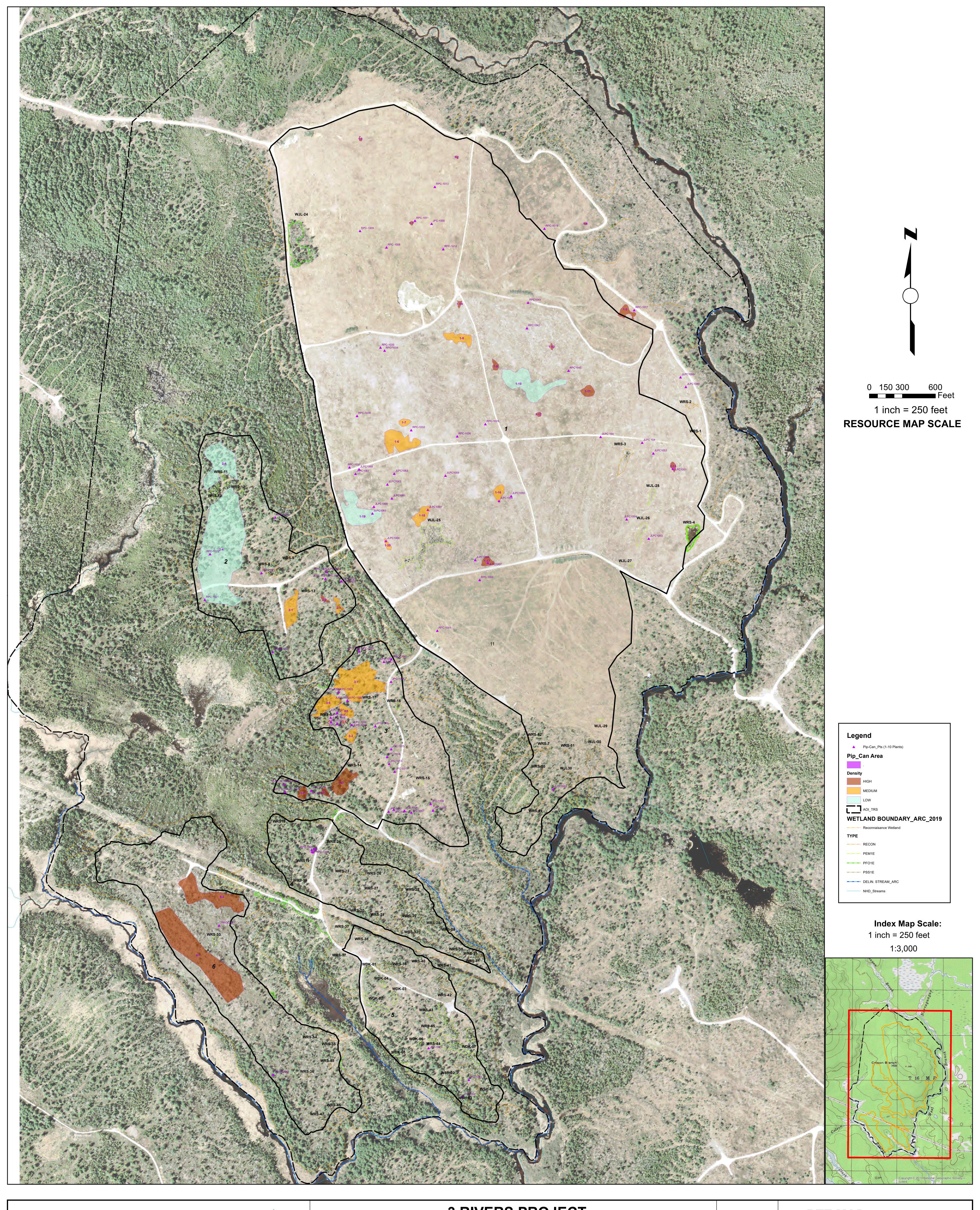


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THREE RIVERS SOLAR POWER, LLC T16 MD, HANCOCK COUNTY, MAINE







**3 RIVERS PROJECT** THREE RIVERS SOLAR POWER, LLC T-16 MD, HANCOCK COUNTY, MAINE



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