

# MEMORANDUM

## Maine Natural Areas Program

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

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**Date:** February 2, 2022  
**To:** Jami MacNeil, DEP  
**From:** Lisa St. Hilaire, Information Manager  
**Re:** Rare and exemplary botanical features, Sugarloaf Mountain Corp, West Mountain Expansion, L-217-26-JX-A, L-217-TG-JY-N, L-217-2C-JZ-N, L-217-L6-KA-N, Carrabassett Valley, Maine.

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MNAP Ecologist Kristen Puryear conducted a site visit at the Sugarloaf West Peak expansion area on November 20, 2020 with Gil Paquette (VHB), Sean Hale (VHB), and Trevor Parsons (Herpetology contractor). The purpose of the field visit was to confirm and field document the conditions and extent of the Subalpine Fir Forest mapped at this location.

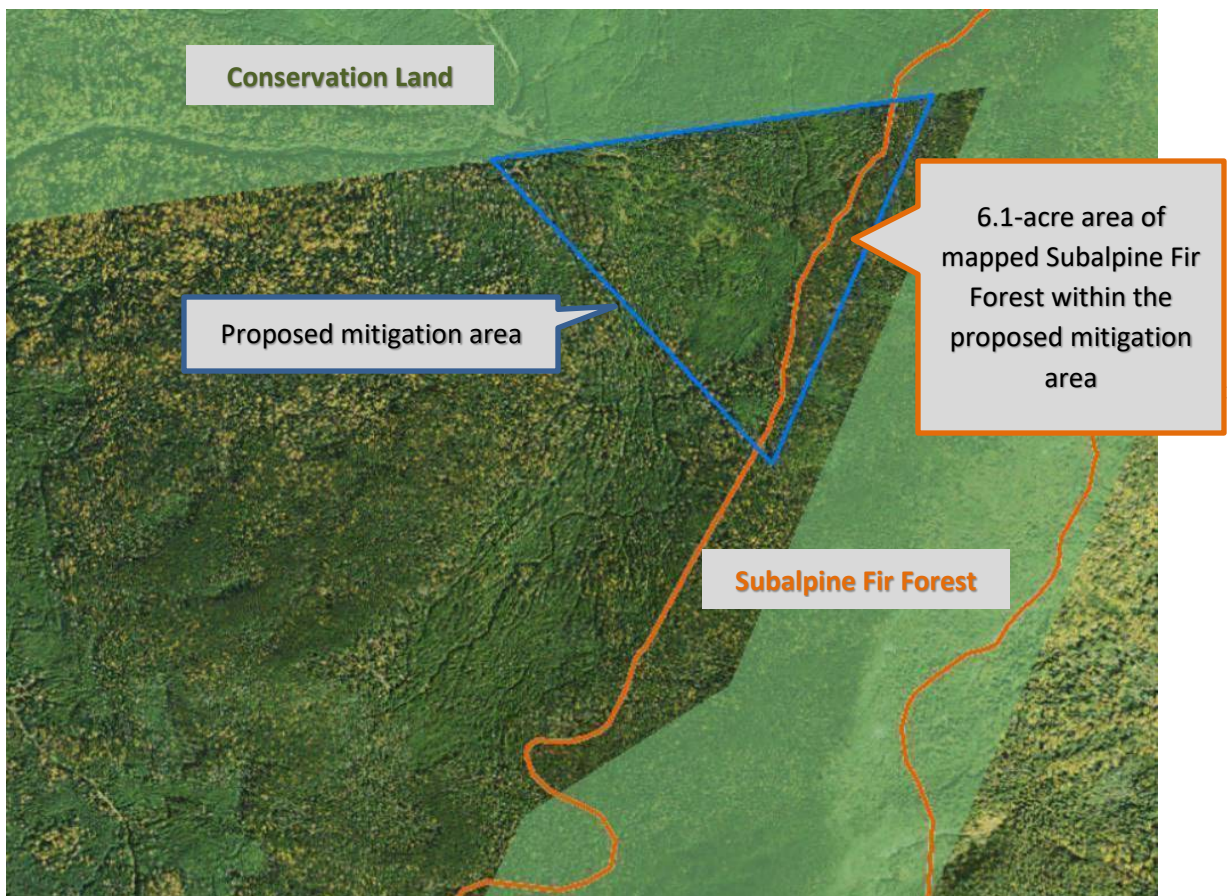
Subalpine Fir Forest is a rare type in Maine (S3, vulnerable) and this is an exemplary occurrence (A quality rank). Small areas of the northern portion of the mapped Subalpine Fir Forest were determined to not be typical habitat and were removed from the polygon. In addition, a small amount of previously unmapped area was added, resulting in a net reduction of ~4 acres in what is now a 1,342-acre mapped Subalpine Fir Forest. Using the updated Subalpine Fir Forest shape for this area, and trail shapes provided by VHB on December 17, 2021, MNAP has calculated that 6.3 ac of Subalpine Fir Forest will be converted to trails. Through vegetation removal and overall fragmentation, trail development will result in vegetation islands that would no longer be considered part of the contiguous extent of this exemplary and rare natural community. Trail development and the fragmented vegetation islands it creates will adversely affect the Subalpine Fir Forest in this area and so are both considered direct impacts. Trail construction and habitat fragmentation directly impacts 20.1 acres of the revised Subalpine Fir Forest.

MNAP appreciates the avoidance and minimization efforts that the Applicant has undertaken in the subalpine area, including the relocation of a ski trail. However, in Section 9 of the Site Permit application to Maine DEP, the applicant proposes placing 36 acres of their land into a permanent easement. The benefits of this proposed land are that it is located above 2,700 feet in elevation and is adjacent to the Appalachian Trail Corridor (and therefore represents an extension of existing conservation lands), but much of it appears to have experienced timber management activities in the recent past, and only 6.1 acres is mapped as Subalpine Fir Forest (see area between blue mitigation line and red natural community lines below). Based on this GIS-based assessment, the 36-acre mitigation parcel does not appear to adequately compensate for impacts to 20.1 acres of Subalpine Fir Forest to the north. In order to meet a 4:1 mitigation ratio, 80 acres of Subalpine Fir Forest would be needed.

It is our understanding that MDIFW has requested a site visit to the proposed mitigation parcel to evaluate habitat potential for Bicknell's Thrush. MNAP similarly requests the opportunity for a site visit to evaluate the condition and extent of Subalpine Fir Forest within the proposed mitigation parcel. In addition, upon review of aerial imagery and MNAP data, it appears there

are potentially other locations and configurations of mitigation parcels that would likely be more suitable as compensation, in particular along the boundary with the AT lands. This area is within Plan 1 Lot 3 in Mount Abram Twp. and records indicate it is owned by the Applicant. Lastly, MDIFW has encouraged the Applicant to work with their agency to designate areas of land that could be used as a “habitat bank” for future phases of high elevation development at the site, which is an approach MNAP would also support. Because of this and our evaluation that the proposed mitigation site may not be adequate for Subalpine Fir Forest impacts at the trail expansion, it seems worthwhile to consider larger and / or alternative configurations of possible mitigation land within the Applicant’s land holdings above 2700’.

Finally, MNAP requests the opportunity to review the specific terms of the conservation easement or deed restriction (i.e., who would hold it, what are the land use restrictions, etc.) prior to approval.



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 Natural Areas Program or about rare or unique botanical features at this site.