



Maine Department of Conservation
Natural Areas Program

Polygala senega L.

Seneca Snakeroot

Habitat: Dry rocky or gravelly, chiefly calcareous areas. [Non-tidal rivershore (non-forested, seasonally wet)]

Range: New Brunswick to Alberta, south uplands to Georgia, Arkansas.

Phenology: In Maine, flowers June - July. Milkworts are recognized by their irregular (zygomorphic) flowers. The lower petal is keeled and ornamented with fringe-like crests.

Family: Polygalaceae



Aids to Identification: Seneca snakeroot is a perennial milkwort that usually has several clustered stems (10-50 cm) from the same hard, knotty, horizontal root. The leaves are alternate, lance-shaped, the lowest reduced in size, and are irregularly serrulate rather than entire. The small white flowers (3 mm long) are borne in dense terminal spike-like racemes.

Illustration from Britton & Brown's Illustrated Flora of the Northern United States and Canada, 2nd ed.

Ecological characteristics: Although in some parts of its range Seneca snakeroot apparently grows in moist woods and prairies, in Maine it seems to be restricted to sunny well-drained sites on calcareous gravels or ledges. Apparently, this species once grew in abundance on the gravelly terraces along the Aroostook River in the Fort Fairfield area, but disappeared as land was cleared and cultivated, and the area was developed.

Synonyms:

Rarity of *Polygala senega*

State Rank:	S1	Critically imperiled in Maine because of extreme rarity or vulnerability to extirpation.
New England Rank:	Division 2	Regionally rare plant: Fewer than 20 current (seen since 1970) occurrences within New England.
Global Rank:	G4G5	Widespread, abundant, and apparently secure globally but possibly with cause for long-term concern.

Status of *Polygala senega*

Federal Status:	None	No Federal Status.
State Status:	Threatened	Rare and; with further decline, could become Endangered or federally listed as Threatened. Listing criteria met: Special habitat, Vulnerable to human activity

Known Distribution in Maine:

- ▲ Historical (before 1982)
- Recent (1982 - present)

This rare plant has been documented from a total of 2 town(s) in the following county(ies): Aroostook.

Dates of documented observations are: 1980, 1982

Reason(s) for rarity:

Habitat naturally scarce, and with clearing and cultivation, may be declining.

Conservation considerations:

Found on sunny, only partly wooded banks, it is possible that increased shade would be detrimental to the populations, but effects are not really known.

The information in this fact sheet was downloaded from the Natural Areas Program's Biological and Conservation Database on 14 MAY 2004. We are grateful to our Botanical Advisory Group for additional information on particular species, and in particular, to Arthur Haines for his assistance with identifying characteristics and taxonomic questions. Nomenclature follows Haines and Vining's *Flora of Maine* (V.F. Thomas Press, 1998); where older works refer to a plant by another name, it is given under "Synonyms". The Natural Areas Program, within the Department of Conservation, maintains the most comprehensive source of information on Maine's rare or endangered plants and rare or exemplary natural communities, and is a member of the Association for Biodiversity Information.

If you know of locations for this plant or would like more information on this species,
 please contact the Natural Areas Program
 State House Station 93, Augusta, Maine 04333; telephone (207) 287-8044.





Maine Department of Conservation
Natural Areas Program

Prenanthes racemosa Michx.

Glaucous Rattlesnake Root

- Habitat:** Calcareous riverbanks, shores and damp prairies. [Non-tidal rivershore (non-forested, seasonally wet)]
- Range:** Quebec to Alberta, south to New Brunswick, northern Maine, and west to Colorado; disjunct populations in southeastern New York and northern New Jersey.
- Phenology:** A perennial, blooms from late July (southward) through August; fruits in fall.
- Family:** Asteraceae



Illustration from Britton & Brown's Illustrated Flora of the Northern United States and Canada, 2nd ed.

Aids to Identification: *Prenanthes racemosa* grows along open, cobbly rivershores, and in bloom, the plants stand 30 cm tall, sometimes overtopping nearby vegetation. The stem and oval to oblong leaves (which occur alternately on the stem) are smooth, and have a distinctive bluish-grey bloom. The capitula (flowerheads) are borne in an elongated raceme-like inflorescence which is characteristically bent like a hairpin to the lower stem while in bud, straightening up as the flowers open. The flowerheads themselves are upright to slightly drooping, surrounded by an involucre of rather stiffly-hairy bracts (unique among Maine *Prenanthes*), and the flowers within (ray flowers) are a dusty pink color.

Ecological characteristics: In Maine, this species is restricted to a few spots along the St. John and Aroostook Rivers, in the northernmost part of the state. It grows along cobbly, ledgy, or gravelly shores where calcium is available from the bedrock or weathering till, and where it is subjected to high water and/or ice scouring at least annually. It is commonly associated with other unusual or rare northern calciphiles, such as *Allium schoenoprasum* var. *sibiricum*, *Primula mistassinica*, *Tanacetum bipinnatum* ssp. *huronense*, etc.

Synonyms: Formerly known as *Nabalus racemosus* (Michx.) Hook. and *Harpalyce racemosa* (Michx.) D. Don ex Beck.

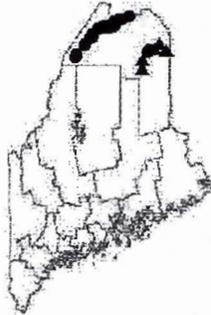
Rarity of *Prenanthes racemosa*

State Rank:	S3	Rare in Maine
New England Rank:	Division 2	Regionally rare plant: Fewer than 20 current (seen since 1970) occurrences within New England.
Global Rank:	G5	Demonstrably widespread, abundant, and secure globally.

Status of *Prenanthes racemosa*

Federal Status:	None	No Federal Status.
State Status:	Special Concern	Rare in Maine, based on available information, but not sufficiently rare to be considered Threatened or Endangered.

Known Distribution in Maine:



- ▲ Historical (before 1982)
● Recent (1982 - present)

This rare plant has been documented from a total of 14 town(s) in the following county(ies): Aroostook.

Dates of documented observations are: 1938, 1939, 1941, 1942, 1980, 1984 (2), 1989 (3), 1991 (2), 1993 (7), 1997 (3), 1999 (12), 2001 (14)

Reason(s) for rarity:

At southern limit of range, and suitable calcareous habitat naturally scarce.

Conservation considerations:

Maintain hydrologic integrity of its rivershore habitat, including the natural disturbance by water and ice. Populations along rivershores could be harmed if all-terrain vehicle use of the habitat increases.

The information in this fact sheet was downloaded from the Natural Areas Program's Biological and Conservation Database on 10 MAY 2004. We are grateful to our Botanical Advisory Group for additional information on particular species, and in particular, to Arthur Haines for his assistance with identifying characteristics and taxonomic questions. Nomenclature follows Haines and Vining's *Flora of Maine* (V.F. Thomas Press, 1998); where older works refer to a plant by another name, it is given under "Synonyms". The Natural Areas Program, within the Department of Conservation, maintains the most comprehensive source of information on Maine's rare or endangered plants and rare or exemplary natural communities, and is a member of the Association for Biodiversity Information.

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Maine Department of Conservation
Natural Areas Program

Symphotrichum anticostense (Fern.) Nesom

Anticosti Aster

Habitat: Circumneutral, cobble rivershores [Non-tidal rivershore (non-forested, seasonally wet)]

Range: Quebec south to Maine.

Phenology: Perennial.

Family: Asteraceae

Aids to Identification: This aster is somewhat similar in appearance to the common New York aster (*S. novi-belgii*) which is shown here. Anticosti aster grows from a long, creeping rhizome, as does the New York aster; however, the former has fewer flowering heads, narrow, almost rigidly upright leaves, and phyllaries which are neither foliaceous nor outwardly spreading, as is normally the case in *S. novi-belgii*. The flower stalks (called peduncles) of Anticosti aster are also often longer than 3 cm, while those of the New York aster are generally shorter.



Illustration from Britton & Brown's Illustrated Flora of the Northern United States and Canada, 2nd ed.

Ecological characteristics: Little is known about the ecology of this species in Maine, as there is only one currently site in the state where it is known to occur. In Quebec and New Brunswick this species frequents circumneutral cobble or sand rivershores that are kept clear of woody competitors (e.g., *Alnus* spp. and *Salix* spp.) by period rivershore scouring by ice in the sprintime.

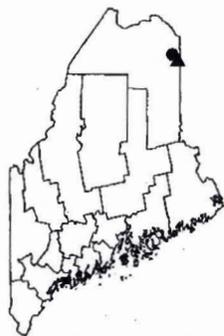
Synonyms: Formerly known as *Aster anticostensis* Fern. and *Aster gaspensis* Victorin.

Rarity of *Symphotrichum anticostense*

State Rank:	S1	Critically imperiled in Maine because of extreme rarity or vulnerability to extirpation.
New England Rank:	Division 4	Occurred historically in New England.
Global Rank:	G3	Globally rare.

Status of *Symphotrichum anticostense*

Federal Status:	None	No Federal Status.
State Status:	Endangered	Rare and in danger of being lost from the state in the foreseeable future; or federally listed as Endangered. Listing criteria met: Few individuals, Special habitat, At edge of range, Vulnerable to human activity

Known Distribution in Maine:

▲ Historical (before 1982)
● Recent (1982 - present)

This rare plant has been documented from a total of 2 town(s) in the following county(ies): Aroostook.

Dates of documented observations are: 1901, 1998

Reason(s) for rarity:

At southern limit of range. The 1901 collection, labeled as *Aster junceus*, was extirpated by the Tinker Dam on the Aroostook River, when the botanically rich gravel rivershores and ledges in Fort Fairfield were submerged.

Conservation considerations:

Maintain hydrologic integrity of its rivershore habitat, including the natural disturbance by water and ice. All-terrain vehicle use of the habitat, if it were to occur, could be detrimental to the plant.

The information in this fact sheet was downloaded from the Natural Areas Program's Biological and Conservation Database on 17 MAY 2004. We are grateful to our Botanical Advisory Group for additional information on particular species, and in particular, to Arthur Haines for his assistance with identifying characteristics and taxonomic questions. Nomenclature follows Haines and Vining's *Flora of Maine* (V.F. Thomas Press, 1998); where older works refer to a plant by another name, it is given under "Synonyms". The Natural Areas Program, within the Department of Conservation, maintains the most comprehensive source of information on Maine's rare or endangered plants and rare or exemplary natural communities, and is a member of the Association for Biodiversity Information.

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Thalictrum venulosum Trel.

Boundary Meadow-Rue

- Habitat:** Prairies, thickets, open woods and shores.
- Range:** Labrador and Quebec south to Maine and New York, west to British Columbia and Yukon Territory, south to New Mexico.
- Phenology:** Flowering in June and July
- Family:** Ranunculaceae

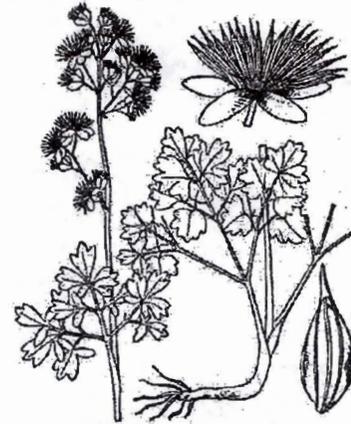


Illustration from Britton & Brown's
Illustrated Flora of the Northern United
States and Canada, 2nd ed.

Aids to Identification: Meadow-rues are recognized by their alternate, divided leaves, panicles of yellowish greenish or pinkish flowers with numerous stamens, and leaflets with lobed margins. Boundary meadow-rue has small flowers in a panicle and leaflets with 4 or more lobes. The leaflets have distinct veins. The achenes are curved. It may resemble early meadow-rue (*T. dioicum*) however the two can be separated based on the length of the petiole of the leaf that subtends the inflorescence. *Thalictrum venulosum* has a short petiole (up to 3 cm), whereas *T. dioicum* is longer (up to 6 cm).

Ecological characteristics: Historic locations for this plant have been along river banks in northern Maine.

Synonyms: Maine populations are represented by the variety *confine* (Fern.) Boivin. Formerly referred to as *Thalictrum confine* Fern.

Rarity of *Thalictrum venulosum*

State Rank: S1

Critically imperiled in Maine because of extreme rarity (five or fewer occurrences or very few remaining individuals or acres) or because some aspect of its biology makes it especially vulnerable to extirpation from the State of Maine.

New England Rank: None

Global Rank: G5

Widespread, abundant, and secure globally.

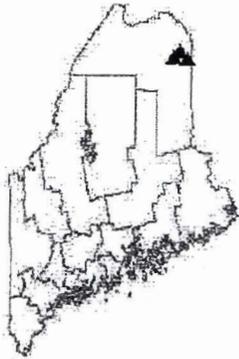
Status of *Thalictrum venulosum*

Federal Status: None

No Federal Status

State Status: Special Concern

Rare in Maine, based on available information, but not sufficiently rare to be considered Threatened or Endangered.



Known Distribution in Maine:

This rare plant has historically been documented from a total of 3 towns in the following county: Aroostook

Dates of documented observations are: 1902, 1940, 1941

- ▲ Historical (before 1982)
- Recent (1982 to present)

Reasons for rarity:

At southern limit of range.

Conservation considerations:

Unknown, has not been seen recently. Changes in hydrology along the rivers where a population once occurred may have been detrimental.

The information in this fact sheet was downloaded from the Natural Areas Program's Biodiversity Tracking System on 20 MAY 2004. Nomenclature follows Haines and Vining's *Flora of Maine* (V.F. Thomas Press, 1998) and *Flora Novae Angliae* Tracheophyte Checklist (2004) available at: http://arthur_haines.tripod.com/checklist.htm. Where older works refer to a plant by another name, it is given under "Synonyms". The Natural Areas Program, within the Department of Conservation, maintains the most comprehensive source of information on Maine's rare, threatened, and endangered plants and natural communities, and is a member of the Association of Biodiversity Information.

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Maine Department of Conservation
Natural Areas Division

Rare Plant Fact Sheet
PDCPR06020

Triosteum aurantiacum Bickn.

Wild Coffee

- Habitat:** Rich woods and thickets. [Non-tidal rivershore (non-forested, seasonally wet); Hardwood to mixed forest (forest, upland)]
- Range:** Cape Breton to western Ontario and Minnesota, south to North Carolina, Kentucky, and Kansas.
- Phenology:** Flowers in June. Fruits, green in summer, mature to bright orange by fall.
- Family:** Caprifoliaceae

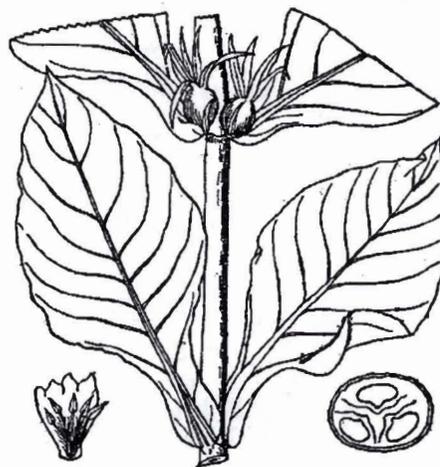


Illustration from Britton & Brown's Illustrated Flora of the Northern United States and Canada, 2nd ed.

Aids to Identification: Wild coffee is a coarse, tall, and hairy perennial herb. Its large eggshaped leaves grow in pairs, usually united by a ridge around the stem. The sessile (i.e., unstalked) flowers, borne 1-4 in the axils of the leaves, are a dull red-purple, somewhat bell-shaped, with five unequal lobes. The most distinctive feature of the plant are its conspicuous bright orange hairy fruits crowned by persistent sepals.

Ecological characteristics: Although it can apparently grow in shade, in dry or rocky woods, this species seems to grow most vigorously in rich, moist soil where it receives at least partial sunlight. Usually fruits abundantly.

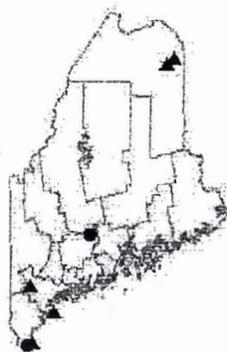
Synonyms: Maine populations are represented by var. *aurentiacum*.

Rarity of *Triosteum aurantiacum*

State Rank:	S1	Critically imperiled in Maine because of extreme rarity or vulnerability to extirpation.
New England Rank:	Division 3:ME	Locally rare plant: Not rare throughout New England, but Maine occurrences are disjunct or ecologically anomalous from the rest of its New England range.
Global Rank:	G5	Species demonstrably widespread, abundant, and secure globally.

Status of *Triosteum aurantiacum*

Federal Status:	None	No Federal Status.
State Status:	Endangered	Rare and in danger of being lost from the state in the foreseeable future; or federally listed as Endangered. Listing criteria met: Declining populations, Vulnerable to human activity



- ▲ Historical (before 1982)
● Recent (1982 - present)

Known Distribution in Maine:

This rare plant has been documented from a total of 7 town(s) in the following county(ies): Aroostook, Cumberland, Kennebec, York.

Dates of documented observations are: 1910, 1933, 1941, 1961, 1982, 1991, 1997

Reason(s) for rarity:

At northern limit of range.

Conservation considerations:

Populations are vulnerable to conversion of their habitat to residential or commercial use. This is believed to be partly responsible for its rarity in Maine.

The information in this fact sheet was downloaded from the Natural Areas Program's Biological and Conservation Database on 17 MAY 2004. We are grateful to our Botanical Advisory Group for additional information on particular species, and in particular, to Arthur Haines for his assistance with identifying characteristics and taxonomic questions. Nomenclature follows Haines and Vining's *Flora of Maine* (V.F. Thomas Press, 1998); where older works refer to a plant by another name, it is given under "Synonyms". The Natural Areas Program, within the Department of Conservation, maintains the most comprehensive source of information on Maine's rare or endangered plants and rare or exemplary natural communities, and is a member of the Association for Biodiversity Information.

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Maine Department of Conservation
Natural Areas Program

Rare Plant Fact Sheet
PDVAL03070

Valeriana uliginosa (Torr. & Gray) Rydb.

Marsh Valerian

- Habitat:** Circumneutral fens, in open areas.
[Forested wetland; Open wetland, not coastal nor rivershore (non-forested, wetland)]
- Range:** Quebec to Ontario, Maine, Vermont, New York, Ohio, Indiana, Michigan, and Wisconsin.
- Phenology:** Perennial, flowers May - June.
- Family:** Caprifoliaceae



Illustration from Britton & Brown's Illustrated Flora of the Northern United States and Canada, 2nd ed.

Aids to Identification: Valerians are perennial herbs with opposite, pinnately compound leaves. The flowers are small and white. During flowering, the sepals appear as 5-20 narrow bristles; in fruit these elongate and form a plume that aids in wind dispersal of the fruits, similar to dandelion. *V. uliginosa* is a native species of circumneutral fens with simple basal leaves and glabrous leaflets. The introduced *V. officinalis* occurs in fields and disturbed areas. This similar looking species has pinnately-divided leaves and pubescent leaflets (on the undersurface).

Ecological characteristics: Found in cool, limy swamps associated with larch (*Larix laricina*) and white cedar (*Thuja occidentalis*). May decline as trees encroach on the openings in which it grows.

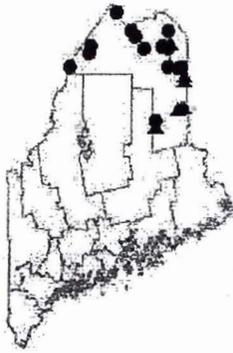
Synonyms: Former names include *Valeriana sitchensis* Bong. ssp. *uliginosa* (Torr. & Gray) Boivin.

Rarity of *Valeriana uliginosa*

State Rank:	S2	Imperiled in Maine because of rarity or vulnerability to further decline.
New England Rank:	Division 2	Regionally rare plant: Fewer than 20 current (seen since 1970) occurrences within New England.
Global Rank:	G4Q	Widespread, abundant, and apparently secure globally, but with cause for long-term concern (questionable taxonomy).

Status of *Valeriana uliginosa*

Federal Status:	None	No Federal Status.
State Status:	Special Concern	Rare in Maine, based on available information, but not sufficiently rare to be considered Threatened or Endangered.

Known Distribution in Maine:

▲ Historical (before 1982)
● Recent (1982- present)

This rare plant has been documented from a total of 22 town(s) in the following county(ies): Aroostook.

Dates of documented observations are: 1896 (2), 1898, 1900, 1909, 1916, 1956, 1983, 1985 (2), 1986, 1987 (2), 1989, 1992, 1998 (2), 1999, 2001 (2), 2002 (4)

Reason(s) for rarity:

Habitat naturally scarce.

Conservation considerations:

Most often found in openings within its cedar bog habitat, suggesting that decreased light with canopy closure may be limiting. Partial removal of the canopy could be beneficial to the species; complete canopy removal could cause more drastic habitat changes and would be more likely to be detrimental.

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Circumneutral Fen

State Rank S2

Community Description

This peatland vegetation type is dominated by sedges or grades into dwarf shrubs. Dwarf shrub and graminoid cover each range from 10-75% and are inversely proportional to each other. Sparse cedar or larch may dot the fen. Shrubs may be patchy. Dominant sedges include deer-hair sedge and slender sedge; white beak-rush is locally common. Alpine cotton-grass, with its white wispy fruiting heads, is often obvious but not abundant. Shrubby cinquefoil and bog rosemary are characteristic. Northern bog aster and marsh mulhy are good indicators, as are the calciphiles livid sedge, yellow sedge, sparse-flowered sedge, and northern bog sedge. The bryoid layer is extensive, with *Campylopusium* fen moss indicative.

Soil and Site Characteristics

These peatlands are influenced by calcium rich, circumneutral (rather than acidic) water. The substrate pH is 5.6 or higher, and remains saturated through the year. These peatlands occur in microtopographic basins where contact with groundwater provides some nutrients to the plants. Sites are typically at lower elevations (<1000') and usually in areas underlain by limestone or other calcareous bedrock.



Sphagnum in Cedar

Diagnostics

Peatland vegetation is dominated by sedges or sedge/shrub mixtures including deer-hair sedge, slender sedge, and bog rosemary. Circumneutral indicators are present, such as shrubby cinquefoil, livid sedge, marsh mulhy, grass-of-parnassus, and Kalm's lobelia.

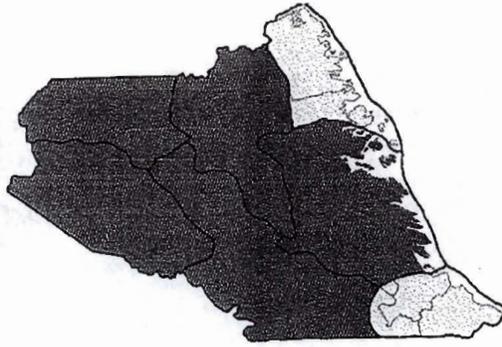
Similar Types

Other peatland communities lack the circumneutral indicators typical of this type. Circumneutral Riverside Seeps have many similar species, but do not occur on peat substrate.

Conservation, Wildlife, and Management Considerations

This rare community type has been subject to few threats to date. Some examples occur on public lands and private conservation lands. Impoundment or draining would have negative

Location Map



Community is known from this Ecoregion
Community may occur in this Ecoregion
Bailey's Ecoregion
County



Characteristic Plants

These plants are frequently found in this community type. Those with an asterisk are often diagnostic of this community.

Sapling/shrub

- Larch*
- Northern white cedar*
- Sweetgale*

Dwarf Shrub

- Bog rosemary*
- Leatherleaf*
- Shrubby cinquefoil*
- Sweetgale*

Herb

- Deer-hair sedge*
- Marsh mulhy
- Northern blue flag
- Northern bog aster
- Slender sedge*
- Tussock sedge*

Bryoid

- Campylopusium fen moss
- Sphagnum warnstorffii**

Associated Rare Plants

- Capillary sedge
- Dioecious sedge
- Livid sedge
- Low spike-moss
- Prairie sedge
- Slender-leaved sundew
- Swamp birch

Associated Rare Animals

- Clayton's copper

Examples on Conservation Lands You Can Visit

- Lake Umbagog National Wildlife Refuge - Oxford Co.
- Mattagodus Wildlife Management Area - Penobscot Co.
- Salmon Brook Lake Bog Public Lands - Aroostook Co.
- Woodland Bog Preserve - Aroostook Co.



Clayton's Copper on Shrubby Cinquefoil

impacts on hydrology and consequently on vegetation. Maintaining appropriate wetland buffers is important in minimizing the effects of adjacent land use. Degradation from recreational use has not been an issue in most places, but if disturbance, such as foot traffic, is a necessity, traversing during frozen conditions or using boardwalks can reduce impacts.

This community is inhabited by the rare

Clayton's copper butterfly, which uses shrubby cinquefoil as its sole larval host plant and primary adult nectar plant. This butterfly is found at only 14 sites worldwide, nine in Maine and five in New Brunswick. All known occurrences are in circumneutral fens with shrubby cinquefoil stands large enough to support a persistent population of the butterfly. Thaxter's pinion moth uses sweegale and larch as larval host plants and may be found in this community as well.

Distribution

Most typically in the limestone regions of northern Maine, sporadically westward, eastward, and southward. (Laurentian Mixed Forest and New England - Adirondack Provinces.) Extends to northern New England and New York; Canadian distribution not well known.

Landscape Pattern: Small Patch



BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Docket No. 1043 (Sub-No. 1)

Bornstein
#ET-18079
DHW
AB 1043 1

MONTREAL, MAINE & ATLANTIC RY., LTD.
- DISCONTINUANCE OF SERVICE AND ABANDONMENT -
IN AROOSTOOK AND PENOBSOT COUNTIES, MAINE

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REPLY OF STATE OF MAINE, DEPARTMENT OF TRANSPORTATION
TO PETITION TO CLASSIFY THE SCOPE
OF THE BOARD'S ENVIRONMENTAL REVIEW

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Dated: March 29, 2010

Attorneys for State of Maine, Department of
Transportation

BEFORE THE
SURFACE TRANSPORTATION BOARD
STB Docket No. 1043 (Sub-No. 1)

MONTREAL, MAINE & ATLANTIC RY., LTD.
- DISCONTINUANCE OF SERVICE AND ABANDONMENT -
IN AROOSTOOK AND PENOBSCOT COUNTIES, MAINE

**REPLY OF STATE OF MAINE, DEPARTMENT OF TRANSPORTATION
TO PETITION TO CLASSIFY THE SCOPE
OF THE BOARD'S ENVIRONMENTAL REVIEW**

The State of Maine, by and through its Department of Transportation ("State"), hereby replies to the Petition to Classify the Scope of the Board's Environmental Review filed by various shippers, requesting that the Board and/or its Section of Environmental Analysis determine that this abandonment and its environmental impacts be examined under a full environmental impact statements ("EIS") rather than under an environmental assessment ("EA").

The State agrees that this is a significant transaction that has the potential for significant environmental, safety and socio-economic impacts. The State, through the Department of Transportation, has submitted comments to SEA regarding the preliminary draft environmental analysis which suggest different areas that warrant further investigation and study. A copy of the comments are attached to this Reply. The State requests that in any decision on how to handle this proceeding, the Board should make sure that in whatever manner it determines to proceed, all of the

environmental impacts are properly and thoroughly weighed and considered, with the proper opportunity for further review and comment by all interested and potentially affected parties.

Respectfully submitted,

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Dated: March 29, 2010

Attorneys for State of Maine, Department of
Transportation

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I served a copy of the foregoing Reply to
Petition on the following by e-mail or by U.S. mail, postage prepaid:

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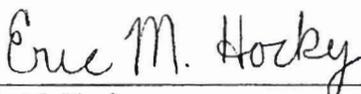
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Dated: March 29, 2010



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VIA ELECTRONIC MAIL

Diana F. Wood
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Surface Transportation Board
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March 29, 2010

Re: STB Docket No. 1043 (Sub-No. 1)
Montreal, Maine & Atlantic Railway, Ltd.
- Abandonment and Discontinuance of Service -
In Penobscot and Aroostook Counties, Maine
Comments to Preliminary Draft Environmental Analysis

Dear Ms. Wood:

This letter sets forth comments of the State of Maine ("State"), by and through its Department of Transportation (Maine DOT). Although these comments are submitted on behalf of the State, they are intended to supplement and not to supersede any comments received from any other agencies or Departments of the State.

Maine DOT submits the following comments to the Preliminary Draft Environmental Analysis (PDEA):

Section 1.2 Description of Line

1. SEA should examine the impacts on all shippers that use and rely on MMA, not only the "significant users" listed in this section. Even small customers can be greatly affected by the loss of rail service, and the impacts on rural communities of harm to any shipper / local employer can be significant.
2. The potential effect on local employment by shippers should be further explored with the shippers. Further, MMA has indicated that the abandonment would lead to a reduction in railroad employment.

Section 1.3 History of Rail Operations

1. Table 4 significantly understates the carload history on the lines subject to abandonment by excluding overhead or "bridge" traffic. MMA handles thousands of additional carloads to and from a customer in Madawaska that pass over the lines. Further, base on MMA's abandonment filing, it should be clarified whether the 2009 figures are for the complete year, or only through September 2009.

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Section 2.0 Alternatives to Abandonment

1. At this time Maine DOT does not believe that is clear that abandonment of the lines is justified. Further, the State continues to explore options for possible acquisition and continued operation. The State is exploring bond funding for a purchase, and Secretary of Transportation LaHood has instructed the Federal Railway Administrator to explore federal funding assistance. SEA's conclusions are based on the assumption that the abandonment will be granted, and that funding will not be available for a public purchase.

Section 3.0 Existing Conditions and Environmental impacts of Abandonment

1. SEA should examine and address the long term secondary/cumulative impacts of the berm areas along the railroad that could be prone to slumping, failure, or eroding if left un-maintained.
2. It has been assumed that all bridges will be left in place; however, the effects of leaving the bridges in place following an abandonment needs to be further explored. SEA should consult further with appropriate State and Federal agencies with jurisdiction over waterways.

Section 3.2 Transportation

1. The analysis sets forth assumes that truck is an alternative for all customers. Customers should be interviewed to determine if, based on commodity or truck rates, this is true.
2. Maine DOT (Mobility Management Division and Transportation Analysis Section) should be consulted further with respect to with respect to the following statement:

“SEA has preliminarily determined that the existing roadways could support the additional truck traffic that would be generated if the proposed abandonment were authorized”

Maine DOT believes that the local roads that serve several of the shippers would be substantially impacted by the additional truck traffic. SEA should examine impacts not only on the major routes (Table 5) but on all affected routes. Examination should be not only of capacity, but also of road construction and ability to handle heavy truck traffic.

SEA should examine and address how the proposed impacts will affect or influence the findings and recommendations of the Aroostook County Transportation Study.

3. Page 16, Paragraph 2 references "Table X." This table is not included.
4. Maine DOT does not believe that there is adequate support for applying the more conservative rail to truck diversion factor (2.3 trucks per railcar) versus the accepted industry standard (4.0 trucks per railcar). . The 4.0 standard would significantly increase the impacts of the proposed action, especially if, as noted above, the PDEA and MMA have understated the volume of traffic that would be affected.

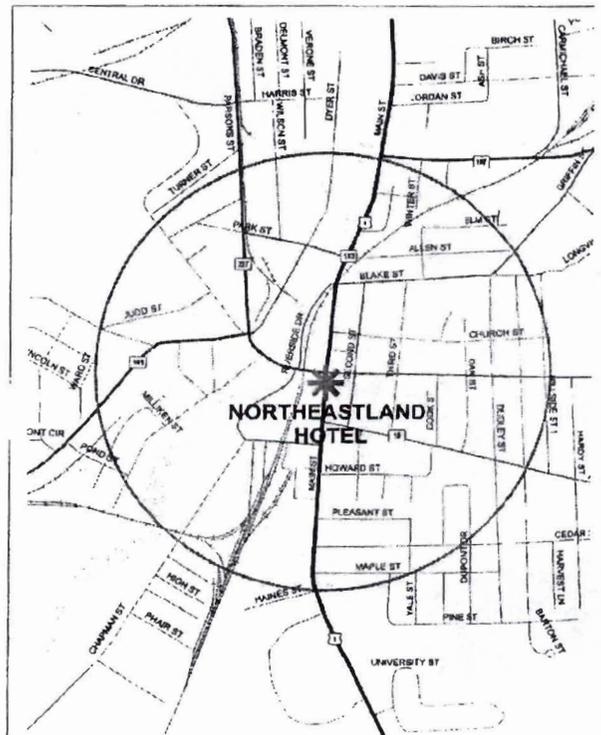
An alternative method for converting commodity volumes to truck counts is presented in 2004 Truck Weight Report (page 10-12):
<http://www.state.me.us/mdot/freight/documents/Non20Exempt20Final20Report.pdf>

The STB should consult with MaineDOT Transportation Analysis Section to determine the appropriate methodology for converting rail volumes to truck traffic.

5. The EA should quantify the pavement and bridge cost impacts for the proposed action. MaineDOT developed a methodology to perform such cost analysis for 5- and 6- axle trucks in the 2004 Truck Weight Report (page 31):
<http://www.state.me.us/mdot/freight/documents/Non20Exempt20Final20Report.pdf>

Section 3.4 Air Quality and Noise

1. As noted above, air and noise impacts may increase if the 4.0 truck to railcar diversion factor is used.





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2. Maine had one nonattainment area for particulate matter (PM10) that was redesignated to attainment effective October 30, 1995. This area is located in downtown Presque Isle, within a one-half mile radius of the Northeastland Hotel. Figure 1 shows the boundaries of Presque Isle PM10 maintenance area.

The SEA should analyze the impacts of the increased diesel emissions from the diverted truck traffic on Route 1 and fugitive dust emissions from salvage operations on the Presque PM10 maintenance area. More specifically, SEA should determine whether the proposed action will cause or contribute to any new local violations of the National Ambient Air Quality Standards (NAAQS) for PM10.

Section 3.5 Safety

1. Dwight – Are there safety concerns, based on the list of chemicals, corrosives and fertilizers in Table 2, with hauling hazardous materials via truck through various downtowns in Aroostook County?

Section 3.6 Biological Resources

1. Increased truck traffic as a result of the proposed abandonment will result in additional impacts on local species, with higher potential for road kill. In particular, Maine DOT is concerned about secondary and indirect impacts to the Canadian lynx.
2. The inventory of rare animal and plant features needs to be better described. Data from Maine Department of Inland Fisheries and Wildlife and the Maine Natural Areas Program show a number of features of interest that need to be identified and assessed. These Departments need to be consulted more fully.
3. SEA should further examine the need for maintenance of stream crossings to minimize blockage and impacts to salmon. If bridges are not removed as part of the abandonment, then a method needs to be established to ensure that crossing structures will be maintained after abandonment to prevent crumbling and the blocking of passage.

Section 3.8 Historical and Cultural Resources

1. A full Section 106 analysis needs to be completed under the auspices of the State Historic Preservation Officer.



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2. As noted, there are at least 41 bridges on the lines proposed for abandonment. From the report and lack of photographs it cannot be determined if they have historic value, or what condition they are in. This should be more fully addressed in the Section 106 analysis.
3. Maine DOT believes that the station at Oakfield is still owned by MMA (although it may be leased to a local organization). Accordingly, preservation of the station needs to be addressed as part of the Section 106 analysis.

Section 3.9 Social and Economic

1. Considering the fragile nature of the agriculture and forest product industries, the economic impacts of increasing the overall costs to move goods should be addressed in detail.
2. Although there may be a marginal benefit to the local trucking industry, the countervailing increased costs to customers, increased fuel costs and consumption, and increased pavement and bridge costs discussed above, need to be analyzed to determine the net effect on the economy.
3. Rail dependent shippers are some of the major employers in this rural region. Adverse effects on the shippers could have significant socio-economic impacts on the communities in which they and their employees are located. Further study needs to be made of these potential impacts.

Maine DOT appreciates SEA's consideration of these comments.

Respectfully,

Eric M. Hocky

EMH/e

cc: All parties on the attached service list.



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**SURFACE TRANSPORTATION BOARD
SECTION OF ENVIRONMENTAL ANALYSIS**

EO-1407
DZW
AB 1043 1X

ACCEPT/REJECT NOTICE

ACCEPT OR REJECT THE ENVIRONMENTAL
AND HISTORIC REPORTS IN
STB DOCKET NO. AB-1043 (Sub-No. 1X)

March 1, 2010

We have reviewed the environmental and historic reports submitted in this (X) regulated abandonment, () petition for exemption, () notice of exemption proceeding.

- (X) **THE ENVIRONMENTAL AND HISTORIC REPORTS ARE ACCEPTABLE -**
Based on our review we have determined that the environmental and historic reports will satisfy the submission guidelines as described at 49 CFR 1105.7 and 1105.8.
- () **THE ENVIRONMENTAL AND HISTORIC REPORTS ARE UNACCEPTABLE -**
Based on our review we have determined that the environmental and historic reports are unacceptable for the reasons specified below.

REASONS FOR REJECTION:

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Distribution: Ann Newman, Office of Proceedings
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