State of New York
Public Service Commission

Application
of
Vermont Gas Systems, Inc.
to
Construct a Fuel Gas Transmission Line Under Article VII,
Section 121-a of
The Public Service Law

Town of Ticonderoga, Essex County, New York

EXHIBIT C-3

Gilman & Briggs Environmental: Field Investigation Memo (Draft)

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MEMORANDUM

DRAFT

To: File
From: Art Gilman
Date: 9 December 2013
Re: VGS Phase ARNGP, Phase II, investigations in Ticonderoga, New York

This memorandum recaps my observations on the Ticonderoga Paper Mill property in New York.

Introduction

In New York state, nine plant species are known to be extant that are federally listed as threatened or endangered[1], although no populations of any are known to occur at present in the Champlain Valley region of New York (the nearest current population being in Orange County, more than 150 miles distant). Another ±475 plant species are protected by New York State law and the New York Natural Heritage Program (NY NHP) tracks ± 575 rare plant species in total. Additionally, the NY NHP tracks some 44 rare natural communities. Also of interest is the presence in the region of the federally and state threatened Indiana bat (*Myotis sodalis*), a species that utilizes some forest trees in some for daytime roost sites.

Methodology

I visited the site on 15 November 2012, on which date I accompanied VHB personnel responsible for performing wetland delineations on the site. I inspected the study area provided by VHB and drawn on field maps for the presence of any uncommon, rare, threatened, or endangered plants or significant natural communities. Although late in the season, there was no snow on the ground and plants that were observed could be identified to the species level by characters of the bark, twigs, buds, leaves (in some cases fallen), remnant flowers and inflorescences and fruits. A complete list of plants observed was taken and is appended to this memorandum.

The site is shown on Figure (+++- to be provided by VHB). The northern portion follows Old Lake Road across rough land of the old tank farm that serviced the Mill, and a cultivated field (in corn in 2012) with a hedgerow and mowed or cultivated land north of the hedgerow. Going south, the study area included rough land, forest margin and forest along the route of the old pipes that brought oil from the tank farm to

[1] These are Sandplain Gerardii (*Agalinis acuta*), Northern Wild Monk's-hood (*Aconitum noveboracense*), Seabeach Amaranth (*Amaranthus noveboracensis*), Hart's-tongue Fern (*Asplenium scolopendrium*), Swamp Pink (*Helonias bullata*), Small Whorled Pogonia (*Isotria medeoloides*), Houghton's Goldenrod (*Oligoneuron houghtonii*), Barbed-bristle bulrush (*Scirpus ancistrochaetus*), Leedy's Roseroot, and (*Sedum integrifolium* ssp. *leedyi*).

the Mill, a wetland associated with 5-Mile Creek, a forest patch, and rough, sloping land between the Mill proper and the railroad tracks, which run along the shore of Lake Champlain. The land use includes agriculture and industrial uses, and forest within the security zone of the mill. None of the area appears to be in a completely state. Even the wetland along 5-Mile Creek, which is in the floodplain of Lake Champlain, is influenced by constriction created by the railroad and its culverts.

Results

Rare plants

No rare plant species were observed on the site. A total of 124 species were observed, many of which are weedy, non-native species including agricultural grasses and herbs (e.g., wild parsnip, centaury, unarmed brome grass, etc.), shrubs (honeysuckle, buckthorn). The non-native invasive common reed (*Phragmites communis*) is conspicuous near the Mill.

Forest composition was typical for the region with white pine, red oak, white and green ash, American elm, red maple, black locust, and a few shagbark hickory. The small area of forested floodplain along 5-Mile Creek is dominated bt silver maple (*Acer saccharinum*) and red maple.

The non-forested wetland along 5-Mile Creek is dominated by various graminoids including hybrid cat-tail (*Typha ×glauca*), bulrushes, and sedges. Few aquatic herbs were observed due to the late season.

Overall, the absence of observed rare plants and the very disturbed nature of the site, combined with the general burden of invasive non-native species, are evidence that rare plants are not of concern on this site.

Rare Animals

Several shagbark hickories (*Carya ovata*) of a size large enough to have well-developed platy bark on the upper trunk were mapped. Such trees may provide daytime roost sites for Indiana bat (*Myotis sodalis*). This federally threatened species forms maternity colonies that require warm conditions for day roosts, typically provided on sun-exposed large tree limbs with loose or platy bark (for the bats to hide under), or sun-exposed hollow trunks or limbs. A photo of one such tree in a hedgerow is appended. No other suitable trees were observed in the study area.

Significant Natural Communities

No significant natural communities were observed. The most natural community observed is the small area of forested wetland along 5-Mile Creek, at the west edge (and just beyond) the study area, but this appears to have been impacted by various historical factors and does not appear to have much diversity. A photo of this area is appended. The non-forested wetland has also been impacted, not least by the presence of the invasive hybrid cat-tail. In my opinion, both of these areas have low significance as natural communities. The balance of the area is so disturbed as to have, essentially, no significance.

Forested area along 5-Mile Creek.

Shagbark hickory in hedgerow.