



**STATE OF MAINE**  
**DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY**  
**BUREAU OF RESOURCE INFORMATION & LAND USE PLANNING**

93 STATE HOUSE STATION  
AUGUSTA, MAINE 04333

**JANET T. MILLS**  
GOVERNOR

**AMANDA E. BEAL**  
COMMISSIONER

May 17, 2024

Yvette Meunier, Director of Planning and Development  
13 School Street  
Bowdoinham, ME 04008

Dear Yvette,

The Department of Agriculture, Conservation & Forestry thanks the Town of Bowdoinham for submitting its Comprehensive Plan for review for consistency with the Growth Management Act in accordance with our Comprehensive Plan Review Criteria Rule (the Rule).

As soon as the plan was accepted for review, we invited other state agencies, neighboring municipalities, and your regional planning organization to review it and submit written comments. By the end of the comment period, we received written comments from the Maine Drinking Water Program, the Maine Department of Environmental Protection, the Maine Department of Transportation, and the Beginning with Habitat Program. Those written comments are attached to this letter. The comments contain suggestions for improving and strengthening the plan. We urge the Comprehensive Planning Committee to consider how the plan might be revised to incorporate the suggestions found in the comments.

We are happy to report that we find the Bowdoinham 2024 Comprehensive Plan to be complete and consistent. This means that we have found all sections of the plan, including the future land use section, to be consistent with the Growth Management Act.

Our finding of consistency is not conditional; however, we urge the Committee to consider amending the plan to incorporate the attached agency comments. Per Chapter 208 the town may incorporate the agency comments without resubmitting the Plan to the state.

We appreciate the efforts of community members and municipal staff who contributed to this plan. All involved clearly dedicated a lot of time and discussion to draft this very complete plan. Thanks to the skill and hard work of all involved, this plan will provide important guidance to the community's decision-makers for years to come. Please don't hesitate to contact me at (207) 458-8860 or [abe.dailey@maine.gov](mailto:abe.dailey@maine.gov) if you have any questions.

MUNICIPAL PLANNING ASSISTANCE PROGRAM  
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[WWW.MAINE.GOV/DACF/MUNICIPALPLANNING](http://WWW.MAINE.GOV/DACF/MUNICIPALPLANNING)

Sincere Best Wishes,

*Abe Dailey*

Abe Dailey, Senior Planner  
Municipal Planning Assistance Program

Attachments:

- Public comments (4)

cc: Max Johnstone, MCOG



STATE OF MAINE  
DEPARTMENT OF TRANSPORTATION  
16 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0016

Janet T. Mills  
GOVERNOR

Bruce A. Van Note  
COMMISSIONER

May 3, 2024  
Tom Miragliuolo  
Senior Planner, Municipal Planning Assistance Program  
Department of Agriculture, Conservation and Forestry  
22 State House Station  
Augusta, ME 04333-0022

Dear Tom,

MaineDOT finds the 2024 Bowdoinham Comprehensive Plan consistent with its mobility & transportation policies and goals. We are developing a valuable working relationship with Bowdoinham on mobility issues, as evidenced by the Rt. 125 sidewalk project and Village Partnership Initiative downtown connectivity project, both getting underway in 2024. The best means to solve pedestrian, bicycle and vehicle conflicts is with the town and this agency collaborating on projects and funding that provides solutions. We hope there will be more collaborative opportunities to come.

Further, MaineDOT appreciates Bowdoinham's attentive, practical approach to sea level rise and climate change risk as it applies to infrastructure: "When replacing items in the CIP, such as roads, bridges, etc. at risk from flooding use the most current flood risk standards to elevate roads and bridges, improve road surfaces, and increase culvert sizes, to make them more flood proof." This is the same approach MaineDOT is applying to its own state-wide infrastructure at risk.

Finally, it's worth noting the bridge work occurring in Bowdoinham over the next few years. MaineDOT is scheduled to replace the Abagadasset Bridge in 2025 and rehabilitate the Brooklyn Bridge in 2026.

Thank you for the opportunity to review the current Bowdoinham Comprehensive Plan.

Sincerely,

Stephen Cole  
Regional Planner, Southern & Midcoast Maine

Janet T. Mills  
Governor

Jeanne M. Lambrew, PhD.  
Commissioner



Maine Department of Health and Human Services  
Maine Center for Disease Control and Prevention  
11 State House Station  
286 Water Street  
Augusta, Maine 04333-0011  
Tel: (207) 287-8016; Fax (207) 287-9058  
TTY: Dial 711 (Maine Relay)

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To: Tom Miragliuolo, Senior Planner, DACF  
From: Ashley Hodge, Source Water Protection Coord., Maine CDC Drinking Water Program  
Re: Review of 2024 Town of Bowdoinham Comprehensive Plan  
Date: May 8, 2024

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On behalf of the Maine CDC, Drinking Water Program (MEDWP), I have reviewed the Town of Bowdoinham's 2024 Comprehensive Plan and have provided the following comments.

As you are aware, The Drinking Water Program works to ensure safe drinking water in Maine, to protect public health, by administering and enforcing drinking water and subsurface wastewater regulations, providing education and technical and financial assistance. The comments submitted below are based on the Maine State Planning Office's (SPO) instructions for agency commentors.

I. Specific Comments:

- a. On PDF page 71, under "Water Resources", Conditions & Trends, second paragraph under (1): consider removing "...for the most recent year..." from this section/sentence. The Maine Drinking Water Program (DWP) administered the Maine Source Water Assessment Program (SWAP), as required under the 1996 Amendments to the Federal Safe Drinking Water Act (SDWA). Under the SWAP, the DWP completed an assessment of the risk of contamination for each public water supply source and published the results for the benefit of the operators of each system and their customers. This work was completed in the early 2000s. The DWP continues to offer drinking water source protection technical assistance to public water systems and their municipalities.

II. General Comments:

- a. All of the Bowdoinham Water District's (BWD) public drinking water sources are located within the town of Bowdoin. The Town of Bowdoinham may consider partnering with the Town of Bowdoin to help protect these drinking water sources.
- b. BWD has a water main that crosses the Cathance River at the Route 24 bridge. This river crossing may be vulnerable to climate-related issues in the future. The Town of Bowdoinham should work with BWD to support any future infrastructure changes needed to prevent and/or recover from this potential issue.
- c. The Town should continue to maintain, enact, and/or amend protections for groundwater and aquifer recharge areas. Taking proactive measures to protect Bowdoinham's groundwater and aquifers will continue to support safe drinking water now and in the future, should the Town need to expand their public water supply.

Please feel free to contact me should you have any questions regarding this information.



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

To: Abe Dailey, Municipal Planning Assistance Program, Department of Agriculture, Conservation and Forestry

From: Kristin Feindel, Watershed Management Unit, Division of Environmental Assessment, Department of Environmental Protection

Re: Bowdoinham Comprehensive Plan Review

Date: May 7, 2024

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Thank you for the opportunity to review Bowdoinham’s Comprehensive Plan as it relates to surface waters.

**Appropriate use of data provided by the DEP Division of Environmental Assessment.**

- The Plan includes river and stream identification, descriptions, and maps. This information is used appropriately.
- There are several references to the Marine Resources Chapter, however there doesn’t appear to be one so these references should be removed or renamed if appropriate.

**How the Plan’s policies and implementation strategies promote the State goals relating to DEP’s principal objectives and directives.**

- The Plan’s policies and implementation strategies appear to promote the State goals relating to DEP’s principal objectives and directives.
- More specific strategies would strengthen the implementation of the water resources goals and recommendations.

**Consistency of Plan with DEP’s programs and policies; Measures DEP recommends the town take to ensure its plan addresses and identifies deficiencies and inconsistencies.**

- Overall, the Plan is consistent with the DEP Watershed Management Unit programs.
- There are no major deficiencies or inconsistencies to be addressed.

Please feel free to contact me directly at [Kristin.b.feindel@maine.gov](mailto:Kristin.b.feindel@maine.gov) or 207-215-3461 if you have additional questions or would like more information.

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STATE OF MAINE  
BEGINNING WITH HABITAT  
DEPARTMENT OF INLAND FISHERIES & WILDLIFE  
41 STATE HOUSE STATION  
AUGUSTA ME 04333-0041



Date: May 10, 2024  
To: Tom Miragliuolo, Municipal Planning Assistance  
From: Lisa St. Hilaire, MNAP and Corinne Michaud-LeBlanc, MDIFW  
Re: Bowdoinham Comprehensive Plan Review

On behalf of Beginning with Habitat (BwH), the Maine Department of Inland Fisheries and Wildlife (MDIFW) and the Maine Natural Areas Program (MNAP) have reviewed the town of Bowdoinham’s 2024 Comprehensive Plan (the Plan) and provide the following comments.

BwH is a habitat-based approach to conserving wildlife and plant habitat on a landscape scale. The goal of the BwH program is to maintain sufficient habitat to support all native plant and animal species currently breeding in Maine. BwH compiles habitat information from multiple sources, integrates it into one package, and makes it accessible to towns, land trusts, landowners, conservation organizations, and others to use proactively in conservation planning. The habitat information BwH provides is objective, comprehensive, and equips local decision-makers with the necessary tools to make informed and responsible land use decisions that mesh wildlife and habitat conservation with future growth needs. While BwH information is comprised of both regulated and non-regulated features, it should be used for planning purposes only. Other resources, such as MDIFW’s Environmental Review Program (<https://www.maine.gov/ifw/programs-resources/environmental-review/index.html>) and MNAP’s Environmental Review Program (<https://www.maine.gov/dacf/mnap/assistance/review.htm>) should be contacted for assistance as projects get closer to the design or permitting review phase.

BwH is housed at MDIFW but is comprised of more than ten public agency and conservation partners. Comments provided below represent two BwH public agency partners (MDIFW and MNAP) but are guided by the overall conservation principles of the BwH program. Feedback and recommendations included in this memo are based on the Maine Municipal Planning Assistance Program at the Department of Agriculture, Conservation and Forestry (DACF) instructions for agency comments.

**Appropriate Use of Data Provided by BwH**

We do not feel that MDIFW and MNAP data were adequately or appropriately used in the Bowdoinham Comprehensive Plan. BwH provides natural resource data to all Maine municipalities on behalf of MNAP and MDIFW. Information regarding rare plants and natural communities is provided by MNAP within DACF, and MDIFW data depict high value animal occurrences, wildlife habitats and critical natural resources. The plan includes BwH-supplied maps and tables, but provides minimal or no discussion or analysis related to the town’s critical and important natural resources. We provide some suggestions below for expanding upon the town’s discussion of natural resources and related strategies, and encourage the town to reach out with any questions.



JUDITH CAMUSO  
COMMISSIONER

AMANDA E. BEAL  
COMMISSIONER



Resources identified on BwH maps are accurate at the time they are produced; however, it is important to note that the data contained on these maps are regularly updated. Much of this updated information is accessible to the public online through the BwH Map Viewer:

<https://webapps2.cgis-solutions.com/beginningwithhabitat/mapviewer/>

The Town may also request updated paper and digital BwH maps from MDIFW as often as needed during Plan completion and implementation:

<https://www.maine.gov/ifw/fish-wildlife/wildlife/beginning-with-habitat/maps/index.html>

Additional mapped information on stream habitats and barriers is available on the Maine Stream Connectivity Workgroup's Maine Stream Habitat Viewer:

<https://webapps2.cgis-solutions.com/mainestreamviewer/>

Additional land use planning resources and tools intended for use at the municipal level are available through BwH: <https://www.maine.gov/ifw/fish-wildlife/wildlife/beginning-with-habitat/municipalities/index.html>

### **Relation of Plan's Policies and Implementation Strategies to BwH Principal Objectives and Directives**

While the plan includes implementation strategies that are generally consistent with BwH objectives and directives, we feel that the plan does not include specific, actionable strategies that would advance BwH principal objectives and directives related to the critical and important natural resources found in Bowdoinham. Beginning with Habitat staff would be happy to provide further assistance as the Town works to revise and implement the Plan, such as providing example strategies and best management practices for the sensitive resources found in the Town. We have included suggestions below that are intended to help improve the policies and strategies outlined within the plan.

### **Consistency of Plan with BwH Programs and Policies**

We do not feel that this plan adequately addresses BwH priority resources, and offers little information regarding these resources to the reader. In the plan's current form, we do not find it consistent with our policies.

### **Critical and Important Natural Resources**

The availability of high-quality habitat for plants, animals, and fish is essential to maintaining abundant and diverse populations for both ecological, economic, and recreational purposes. Bowdoinham is home to many critical and important natural resources, including extensive Inland and Tidal Waterfowl and Wading Bird Habitat, Deer Wintering Areas, Significant Vernal Pools, multiple rare plant and wildlife species, wild brook trout habitat, and extensive tidal marsh habitat. Much of the Town is also included within the Kennebec Estuary Focus Area of Statewide Significance, which contains more than twenty percent of Maine's vulnerable and important tidal marshes. The plan references most of these resources, but each of these features should be specifically discussed in the plan with information regarding current resource vulnerabilities that can be addressed through local growth planning. BwH is happy to assist with future plan revisions that could both help to inform the residents of Bowdoinham and enhance the current policies and strategies contained in the plan. We have included comments below to clarify and update some sections of the plan.

*Specific Plan comments and recommendations below are provided by the following staff:*

- MDIFW: Corinne Michaud-LeBlanc (*Beginning with Habitat Program Climate Coordinator*), Keel Kemper (*Regional Wildlife Biologist*), Jason Seiders (*Regional Fisheries Biologist*), and Beth Swartz (*Wildlife Biologist*)
- MNAP: Kristen Puryear (*Ecologist*) and Lisa St. Hilaire (*Information Manager*)

### General Comments and Suggestions Regarding Missing Elements:

Page 17, Future Land Use Map: In reviewing the Future Land Use map, Constraints map, Shoreland Zoning map, and zoning discussion, it is not clear which critical natural resources were incorporated into resource protection zoning or considered in the development of the future land use plan.

Page 25, Natural Resources Strategies: In addition to including narrative on Significant Wildlife Habitats and rare species in the plan, BwH encourages the town to include more specific and actionable strategies for improving natural resource protections. Bowdoinham is home to high quality brook trout streams, as well as populations of the State Threatened tidewater mucket. Both of these species are vulnerable to the impacts of warming water temperatures, and the tidewater mucket is vulnerable to the effects of increased salinity in estuarine habitats due to sea level rise. For both of these species, measures to protect and restore vegetated buffers along shoreland areas is a key strategy for improving habitat quality and resilience; helping to moderate water temperatures, filter runoff, and weather extreme precipitation events. *Beginning with Habitat* encourages towns to increase resource protection in shoreland areas beyond State minimums, such as by extending shoreland zoning to 100-foot buffers along all streams, and considering 250-foot shoreline buffers along waterbodies known to host tidewater mucket populations. See below for additional resources on tidewater mucket.

Page 33, Sea Level Rise & Climate Change Strategies: The town has incorporated a great deal of climate change data and strategies in the plan and shown a great commitment to planning for various impacts of climate change. In relation to improving infrastructure resilience and aquatic connectivity, BwH recommends incorporating Stream Smart crossing design when planning to address undersized culverts and flooding resilience. A pocket guide to Stream Smart Road Crossing is available from MDOT online:

[https://www.maine.gov/mdot/publications/docs/brochures/pocket\\_guide\\_stream\\_smart\\_web.pdf](https://www.maine.gov/mdot/publications/docs/brochures/pocket_guide_stream_smart_web.pdf).

Additionally, the data regarding tidal marshes and sea level rise on pages 178-181 is from 2013, and should be updated to facilitate planning with the best available information. Updated tidal marsh data and mapping tools are available from the Maine Natural Areas Program online at:

[https://www.maine.gov/dacf/mnap/assistance/coastal\\_resiliency.html](https://www.maine.gov/dacf/mnap/assistance/coastal_resiliency.html).

Page 68, Natural Resources: Within the Natural Resources chapter, additional information and discussion of the town's Significant Wildlife Habitats, and rare plants, wildlife, and natural communities is needed to adequately inventory, analyze, and plan for natural resource protection. We offer the following resources regarding elements that were not discussed:

#### *Significant Wildlife Habitats:*

Deer Wintering Areas: [https://www.maine.gov/ifw/docs/deer\\_yards.pdf](https://www.maine.gov/ifw/docs/deer_yards.pdf)

Inland and Tidal Waterfowl and Wading Bird Habitat and Shorebird Areas:

[https://www.maine.gov/dep/land/nrpa/birdhabitat/bird\\_habitat.html](https://www.maine.gov/dep/land/nrpa/birdhabitat/bird_habitat.html)

#### *Threatened, Endangered, and Special Concern Species:*

Tidewater mucket: Tidewater mucket is a State Threatened freshwater mussel that is widespread in Merrymeeting Bay, the lower Kennebec River mainstem above Merrymeeting Bay, and the lower Androscoggin River below the dam in Brunswick, including some tributaries (Muddy and Cathance Rivers). It may also occur in other unsurveyed tributary streams and rivers of this region. Protection of clean, unaltered, forested watersheds and riparian areas is necessary for the long-term persistence of this species. MDIFW encourages towns to take

measures to protect 250-foot vegetated buffers along waterbodies that are known to support tidewater mucket. More information on the species, including recommended conservation actions, is available online at: [https://www.maine.gov/ifw/docs/endangered/tidewatermucket\\_90\\_91.pdf](https://www.maine.gov/ifw/docs/endangered/tidewatermucket_90_91.pdf).

We appreciate the opportunity to comment on Bowdoinham’s 2024 Comprehensive Plan, and hope that these suggestions are helpful. Please reach out to Beginning with Habitat Climate Change Coordinator Corinne Michaud-LeBlanc by email at [corinne.L.michaud-leblanc@maine.gov](mailto:corinne.L.michaud-leblanc@maine.gov), or by phone at (207)-592-5841 should you have any questions. Additional staff contact information and reference material are included below.

**MDIFW Regional Contact Information**

**Region B – Sidney**

270 Lyons Road  
Sidney, ME 04330-9711

**Fisheries** – (207) 287-5300 ext. 2

Jason Seiders, Fisheries Resource Supervisor; email: [Dwayne.J.Seiders@maine.gov](mailto:Dwayne.J.Seiders@maine.gov)

**Wildlife** – (207) 287-5300 ext. 1

Keel Kemper, Regional Biologist; email: [Keel.Kemper@maine.gov](mailto:Keel.Kemper@maine.gov)

**MNAP Contact Information**

Lisa St. Hilaire, Information Manager – 207-287-8044; email [lisa.st.hilaire@maine.gov](mailto:lisa.st.hilaire@maine.gov)

Kristen Puryear, Ecologist – 207-287-8043; email: [kristen.puryear@maine.gov](mailto:kristen.puryear@maine.gov)