



**City of Biddeford
Conservation Commission**

July 23, 2025 at 6:45 PM
City Hall Council Chambers & Zoom

Join Zoom Meeting Online

Meeting ID: 929 1849 5024

Passcode: 792467

Or call in by phone: +1 312 626 6799

1. Adjustment(s) to Agenda
2. Secretary Report
 - 2.a June 25, 2025 Meeting Minutes
3. Presentations
 - 3.a Black Roads: Presentation by BPW Director Jeff Demers
4. Updates & Discussions
 - 4.a Comp Plan: The Matrix
 - 4.b Mark Ward Consultant Report: Payment Status
 - 4.c Bedard Subdivision Update
 - 4.d "Pre-Approved Land Swap Subdivisions" - Maps and Commitments
 - 4.e 2025/26 Budget/'25 Payment Commitments: Maine Association of Conservation Commissions Membership Status
 - 4.f Water Quality Sampling: Updates
 - 4.g BCC and the Pier-Review?
5. New Business
 - 5.a Swan Pond Brook TAP Lot Update
 - 5.b Swan Pond Brook - Grant Opportunities through Saco Watershed Collaborative Efforts
 - 5.b [604b Planning Grant](#)
 - 5.b [319 Nonpoint Source Water Pollution Control Grant](#)

- 5.c August Book Sale/Swap - Public Engagement
- 6. BCC Website
- 7. Maine's Open Farm Day
 - 7.a [Maine's Open Farm Day](#)
 - 7.b [A Case Study](#)
- 8. Other Business
- 9. Next Meeting: 8/27/25, 6:45 PM
- 10. Adjourn

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Attendees:

Richard Rhames, Peter Robbins, Erik Heumiller, Patrick Conlon, Chris Veazie

Staff:

Adi Iriqat, Assistant Planner

Guest:

n/a

Call to order: 6:58 pm

1. Declaration of Quorum / Voting Members
 - 1.a Welcome new CC Appointee: Chris Veazie
2. Adjustment(s) to Agenda
3. Secretary Report
 - 3.a Approval of Meeting Minutes for April 23, 2025 + May 28, 2025
 - Motion to Approve: P. Robbins, Second: P. Conlon, Vote: Unanimous
4. Updates & Discussions
 - 4.a Recap & Discussions of 6/16 Special Meeting
 - Comp Plan Implementation Matrix
 - Draft submitted to Adi on 6/25/2025
 - Consultant Mark Ward Report: Bedard Subdivision
 - Mark's invoice was submitted on 6/24/2025
 - Motion to pay: E. Heumiller, Second: P. Conlon, Vote: Unanimous
 - The developer has pulled the notion of donating "open space" land until they receive design approval
 - Currently, they are in review with IFW, and the project is stalled
 - CC looking to see the City revisit zoning in this area to shift from SR1 to RF to support cluster development
 - "Pre-approved Land Swap Subdivisions"
 - CC looking for the map/plan/land swap documents?
 - E. Heumiller emailed Mike Eon to inquire about the status of any plans to pursue these conceptual development projects

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- 4.b CC Website Page
 - Content updated on 6/4/2025
 - Suggested revisions:
 - Add a link to the ordinance establishing the CC and a link to state law calling for conservation commissions in municipalities
 - Add C. Veazie to the members section (exp. 12/2029)
 - Update partner logos so all are visible (no scrolling needed)
 - Erik to connect w/ Steve Poulus - YouTube content to add
 - “Walk on the Claire Property”
 - Rob Baldwin - Vernal Pernal Study (3-4 videos?)

- 4.c Recap: SVLT Grassland Birds/Habitat Event & Future Event Discussions
 - Reference Link: [Hollis, ME/Poland Spring Case Study](#)
 - Joe Roy (IFW) led the talk, but did not head into the field to avoid disturbing nesting birds
 - Interesting stories of the origin of the “lawn” as a status symbol
 - Next event to take place in the fall when the location is accessible

- 4.d 25/26 Fiscal Year Budget & Current Commitments
 - \$92 reimbursement for E. Heumiller (vernal pool signage)
 - \$550 invoice for M. Ward (Bedard Subdivision Memo)

- 4.e DEP/VRMP Water Monitoring Updates
 - 12 volunteers have attended DEP training and are ready to sample
 - Sampling began 6/25 and will continue through October

- 5. New Business
 - 5.a UNE Pier Review - CC Perspectives?
 - Former Council Chair inquired about CC perspective on the project
 - Concerns about the process and perceived review of the project
 - Planning Board participating in site walk, July 9th, 5:00 PM

 - 5.b Heart of Biddeford: Science Discovery on Main Street Initiative

- 6. Other Business
 - 6a. MNRCP LOI updates
 - 6b. CC to document funding sources ahead of the final implementation matrix

- 7. Adjourn
 - Next meeting scheduled for Wednesday, July 23, 2025 - 6:45 PM
 - Motion to Adjourn: P. Conlon, Second: P. Robbins, Vote: Unanimous

May 24, 2025

Members of the Biddeford Conservation Commission-

I am writing to share my ecological concerns for the residential subdivision as proposed by Bedard Homes LLC. The **footprint of the proposed development fails to fully take into account the adverse impacts on wildlife habitat within the ecologically unique Biddeford-Kennebunkport Vernal Pool Complex**—a Focus Area of Statewide Significance. This project, especially when viewed in conjunction with other forthcoming projects associated with the Clifford Park land swap, like the extension of Winding Creek Lane (West Brook Subdivision) and future extensions of Parkside Drive (Fig. 1), will penetrate into the interior of the West Brook Habitat Block and dramatically shrink the already narrow habitat corridor that links Clifford Park, and the wildlife within it, with the rest of the habitat block.

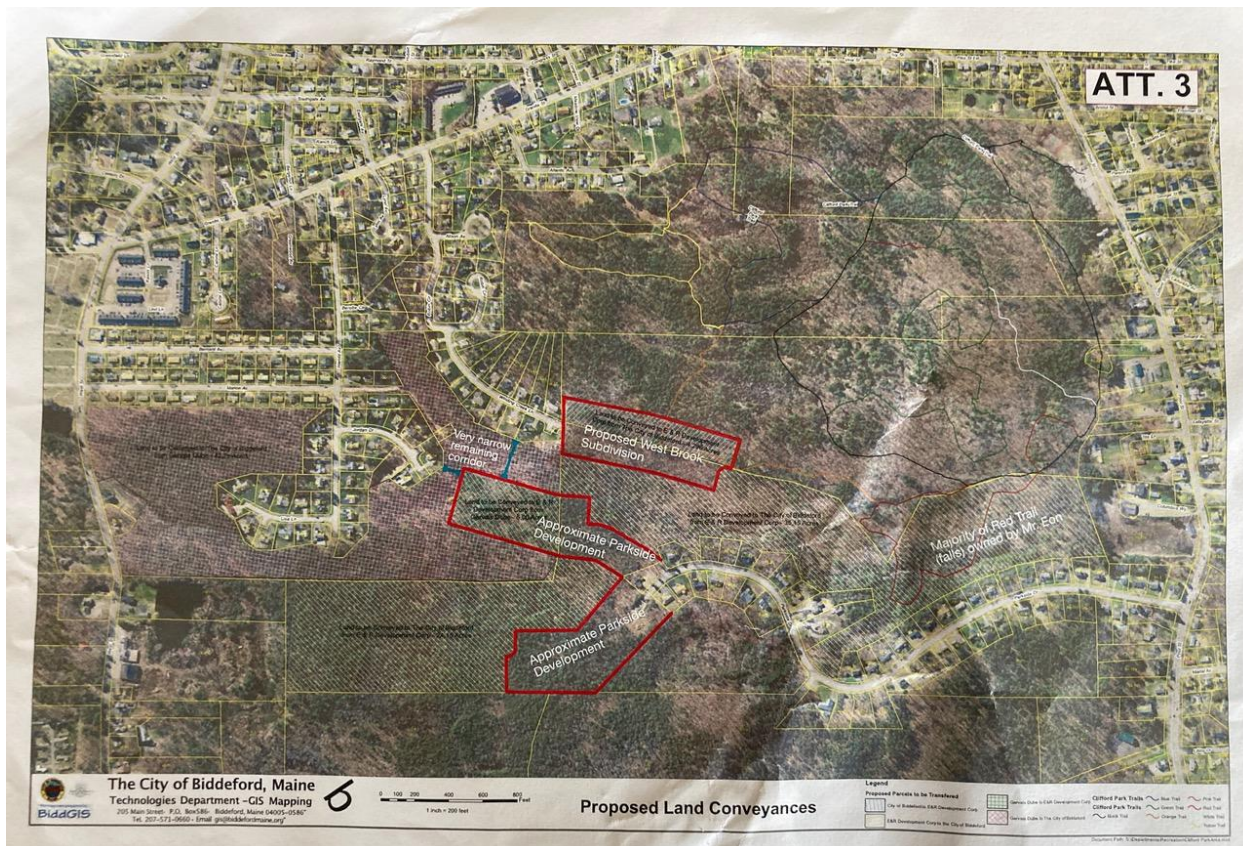


Figure 1. Map indicating proposed developments in the West Brook Habitat Block associated with the Clifford Park land swap that will adversely impact wildlife habitat and isolate Clifford Park from the rest of the habitat block.

The ecological significance of the Biddeford-Kennebunkport Vernal Pool Complex focus area derives from its high concentration of vernal pools and pocket wetlands set in a relatively undeveloped landscape. The focus area provides habitat to a number of rare species, most notably to Blanding's and spotted turtles, two state-listed species whose distributions are primarily limited to southernmost Maine, where unfragmented landscapes have become increasingly rare. Unfortunately, the West Brook Habitat Block is the only portion of the Vernal

Pool Complex focus area within Biddeford that is zoned as SR-1 (Suburban Residential). All other portions of the focus area in the City are zoned as RF (Rural Farm), which suggests that other areas are valued more for their rural character and by association are more amenable to the protection of wildlife habitat. However, the Conservation Commission has strong evidence to suggest that the West Brook Habitat Block might be the most ecologically significant habitat block in the City. Working to reconsider the SR-1 zoning designation for the unfragmented section of the West Brook Habitat Block, would likely elevate the level to which wildlife concerns might be addressed through the planning process.

The following comments are primarily directed to local documentation and habitat requirements of the two rare turtle species, not only because they are rare in Maine, but also because ***successful protection of rare turtle habitat in the West Brook Habitat Block would likely serve as an umbrella that benefits a wide variety of other plant and wildlife species.***

According to records within the Conservation Commission's own compiled database these rare turtle species have been documented at number of wetland locations within the West Brook Habitat Block (Fig. 2). Information documenting the presence of both rare turtle species (Fig 3) was also provided to the City of Biddeford by the Maine Department of Inland Fisheries and Wildlife (MDIFW) in a 2021 Biodiversity Research Institute (BRI) report¹. Unfortunately, the 2021 BRI report failed to include documentation of a spotted turtle in Clifford Park in April 2020 by Grace Glynn that was reported to the Biddeford Conservation Commission² and to MDIFW. Working on behalf of the Biddeford Conservation Commission, I subsequently documented an adult female spotted turtle in Clifford Park in May 2023 (Fig 4) and reported the results to the Commission and to MDIFW³. The recent Clifford Park observations (Fig 2) suggest that ***a subpopulation of spotted turtles persists in Clifford Park.*** In the past, individuals from this subpopulation likely moved freely between the wetlands of Clifford Park and the many documented rare turtle wetlands to the east in the West Brook Habitat Block. Turtles may continue to move between these locations, or attempt to do so, despite the increased fragmentation in the interior of the habitat block.

Both Blanding's and spotted turtles are long-lived species (estimated ages of 60-100+ years) that are slow to reach maturity and have small annual clutch sizes. What this means is that ***adult survivorship is critical to the persistence of both turtle species.*** Adults must reproduce over a large number of years to maintain stable populations. Populations are therefore particularly susceptible to even small numbers of adult losses.

Both Blanding's and spotted turtles are considered semi-aquatic species, which means that in addition to their use of a variety of wetland habitats they also ***make extensive use of uplands*** over the course of their active season from April to October. A 2007 study, that included turtles

¹ Biodiversity Research Institute. 2021. Clifford Park Habitat Connectivity Report. A Report to the City of Biddeford. 18pp. + appendices.

² Glynn, G. 2020. An Ecological Assessment of Clifford Park, Biddeford, Maine. A Report to the Biddeford Conservation Commission & Heart of Biddeford. 14 pp. + appendices.

³ Ward, M. 2023. Results of Vernal Pool Habitat Assessments and Spotted Turtle Overwintering Habitat at Select Wetlands in Clifford Park, Biddeford, 2023.

in Biddeford, found that on average *Blanding's turtles use more than six different wetlands per year and spotted turtles use more than three different wetlands per year*⁴. Both species overwinter in permanent wetlands and move in spring to vernal pools in which large numbers of wood frog egg masses are present as springtime foraging sites.



Figure 2. Map of the West Brook Habitat Block showing the approximate boundaries of the proposed parcel (white polygon), wetlands in which rare Blanding’s or spotted turtles have been observed (yellow and white pins), and vernal pool habitats that are biologically significant for amphibians based on egg mass counts (Source: Biddeford Conservation Commission). Yellow highlighted polygons are conserved lands showing the Clifford Park boundaries prior to the land swap. (Source: Maine Lands Conservation Database)

To utilize different wetlands, *Blanding’s turtles make on average eight movements through uplands and spotted turtles make four movements through uplands per year*. The median distances of these inter-wetland movements were 827ft (252m) for Blanding’s and 604ft (184m) for spotted turtles. In other words, *it is not uncommon for these rare turtles to traverse lengthy stretches of upland habitat to move from one wetland to another*. In addition, *females of both species seek upland sites to lay eggs during the month of June*. And *spotted turtles may spend considerable time on land during the hottest months of the year in July and August in estivation* (a type of summertime dormancy). Both species therefore use a variety of different wetland and upland habitats to fulfill seasonal ecological needs over the course of the active season. To complicate matters further, a given individual of either species may not use the exact same set of wetlands (or upland habitat) from one year to the next. This makes protecting habitat for these species especially challenging and is why *both species tend to persist only in relatively large unfragmented areas that contain both a variety of wetland types and intact uplands*.

⁴ Beaudry et al. 2007. A Study of Movement, Habitat Selection and Population Viability of Spotted and Blanding’s Turtles in Southern Maine. A Report to the US Fish & Wildlife Service. 36pp.

Among the greatest threats to these species are habitat loss, habitat fragmentation, and road mortality. Direct upland habitat loss associated with this project poses a potential threat to both species. More insidious, further fragmentation of the West Brook Habitat Block as a result of this project, and others that may follow, will gradually restrict habitat suitability for these turtles and increase the likelihood of road crossing in an attempt to fulfill annual cycles. Fragmentation will subject turtles to a greater likelihood of road mortality or unwanted encounters with humans or dogs that may result in harm or their removal. The resultant loss of even a few reproductive-aged females could have devastating consequences for populations of these long-lived species.

Turtle trapping effort by MDIFW in the West Brook Habitat Block in 2017 and 2018 suggested that the less abundant & more wide-ranging Blanding's turtle population may have already experienced a localized decline, while the spotted turtle population, at that time, was thought to be fairly robust.⁵ But habitat connectivity between the subset of spotted turtles in Clifford Park and those farther east in the West Brook Habitat Block has already eroded since that time.

From an ecological standpoint, a combination of limiting road access to a single entry point off of Pool Street along with a meaningful shrinkage of the plan footprint by clustering housing units as close as possible to Pool Street would significantly limit road penetration into the interior portion of the habitat block and minimize the impact of this development. The revised version of the subdivision plan includes direct road access from Pool Street (Road A) but also includes road access from Parkside Drive (Road C) to proposed Lots 1-7 which penetrate into the interior of the habitat block.

By limiting the project to the footprint area associated with proposed Lots 8-31 and the single access road off of Pool Street, this project would be much less impactful on wildlife as it would significantly minimize fragmentation of the existing contiguous habitat block and preserve existing natural connectivity between Clifford Park and rest of the West Brook Habitat Block. From an ecological standpoint, the most problematic are proposed Lots 6 and 7. These lots, if developed, will have the greatest adverse impact on habitat connectivity between Clifford Park and the rest of the West Brook Habitat Block. Moreover, Lot 7, as proposed, falls within Significant Wildlife Habitat associated with a documented Significant Vernal Pool. If developed, Lot 7 would likely have an adverse impact on upland habitat for vernal pool breeding amphibians (and therefore likely alter potential rare turtle foraging habitat provided by this significant vernal pool).

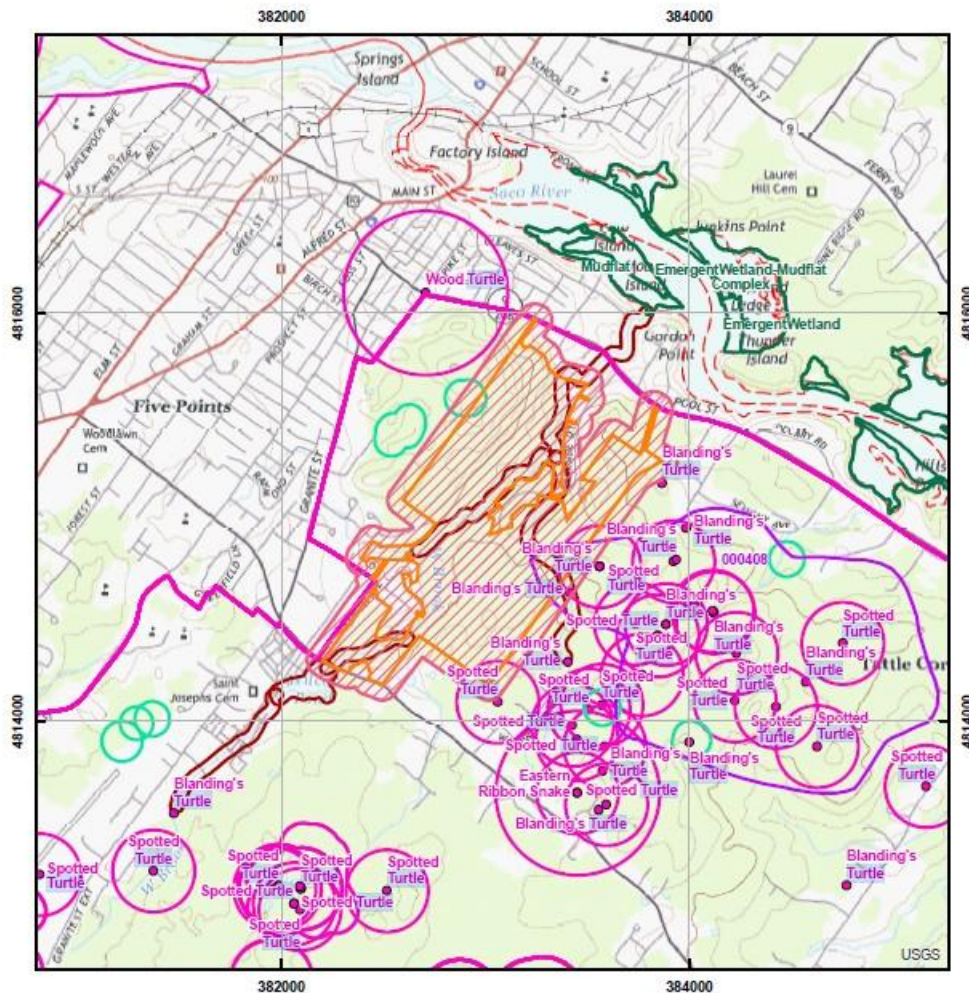
I hope that the Conservation Commission will take these suggestions under consideration as you work to sustain wildlife habitat for future generations. Please don't hesitate to contact me if you have any questions.

Sincerely,

Mark Ward

Ecological Consultant, 28 Poor Farm Road,
Bristol, ME 04539, 207-350-6537,
akamward@gmail.com

⁵ Yorks, Derek. Wildlife Biologist, MDIFW. Personal Communication. June 2021.

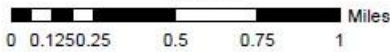


Environmental Review of Fish and Wildlife Observations and Priority Habitats

Project Name: Winding Creek Lane, Biddeford (Version 1)



Maine Department of Inland Fisheries and Wildlife



Projection: UTM, NAD83, Zone 19N
Date: 6/22/2021



Figure 3. Map of significant wildlife observations provided by MDIFW in the BRI report to the City of Biddeford in 2021.



Figure 4. An adult female spotted turtle that was observed in Clifford Park in May 2023 attesting to the persistence of a subset of individuals in the western part of the West Brook Habitat Block.