

*Isinglass River Local Advisory Committee
P.O. Box 224
Strafford, New Hampshire 03884*

December 3, 2012

NH Department of Environmental Services
Alteration of Terrain Bureau
Ridgely Mauck, Program Supervisor
29 Hazen Drive
Concord, New Hampshire 03302-0095

Planning Board
Town of Barrington
John Huckins, Chair
333 Calef Highway
Barrington, New Hampshire 03825

Re: Trinity Conservation LLC, Excavation Plan, Tax Map 210, Lot 57, Town of Barrington

To Whom It May Concern:

The members of the Isinglass River Local Advisory Committee have made a preliminary review of the Alteration of Terrain application package submitted by TF Moran on behalf of Trinity Conservation LLC. Although we have not had an opportunity to complete an exhaustive review of the proposal, nor have we had an opportunity to meet directly with TF Moran representatives, we nonetheless have a number of comments and concerns regarding the application package.

We would begin by noting that the plan set includes pages drafted at different scales, making it difficult to follow the plans from one sheet to the next. Although wetlands certifications are noted on the plans, wetlands delineations do not seem to show, as only Sheets 5 and 6 show wetlands delineations, perhaps due to the varying scale of the plans. This makes it hard to interpret the existing surface water features of the site, although the tax maps seem to indicate that there may be wetlands and/or stream flow on the site. We would also note that Sheets 4, 5, and 6, which show the proposed access road, only show the existing profile of the road, not the proposed profile, making it hard to determine proposed stormwater treatment features. There is no Sheet showing proposed Phase 3 of the excavation. We have also noted that the plan set does not include a cross-section of the proposed concrete pads, and there is insufficient detail to determine if the pads would meet the minimum standards set by BMPs for the safe handling of fuels and other regulated substances, as well as the potential safe handling of regulated substances

involved in blasting. Proper storage of these materials to prevent contamination of stormwater is critical to maintaining water quality, but there are no details provided.

We are most concerned with the stormwater treatment proposal. We are wondering if the Barrington Planning Board has given any consideration to the idea of having the plans reviewed by an environmental consultant. Given the importance of maintaining the high water quality of the Isinglass River, we would note our concern over the potential impact on the river that would follow an overflow of the stormwater infiltration pond or contamination of surface and/or groundwater from blasting activities. We would like to see the entire sedimentation basin structure, including spillway, moved back beyond the 250 foot shoreland buffer.

We have also found a number of inconsistencies in the information provided on the plan set. For example, the current plans call for a sedimentation forebay that is shallower than allowed under the Alteration of Terrain rules. In another example, Sheets 3 and 10 Construction Sequence Notes state that no more than 10 acres may be exposed or disturbed at one time, while the General Notes section on Sheet 10 states that no more than 5 acres may be disturbed—the latter more in keeping with the requirements of RSA 155-E and the Alteration of Terrain rules. Timely reclamation of exposed areas is critical to maintaining water quality and is required by state law. The Reclamation Notes section on Sheet 10 says that slopes shall not be left steeper than 2:1, yet Sheet 8 seems to show 3:1 slopes on both the northwesterly and northeasterly sides of the site. We applaud the proposal to maintain an open area toward the northeasterly end of the operation for turtle nesting at the request of NH Fish and Game, yet we would urge consideration of the steepness of the slope to the east of the proposed nesting area and question whether the slope would impact the nesting site. These steep slopes also seem incompatible with the proposed final residential build-out shown on Sheet 9 of the plan set.

In sum, we would urge the Barrington Planning Board and the Alteration of Terrain Bureau to look closely at these plans, and to consider sending the plans for outside review. We would also note that the site, according to the plan set, falls within Barrington's Groundwater Protection Overlay District (Stratified Drift Aquifer area) yet the applicants are proposing both excavation and blasting over a mapped stratified drift aquifer. We would also urge the reviewers to connect with Shane Csiki at the NH Geological Survey for any insight that he might be able to provide based on the recent fluvial geomorphology study of the Isinglass River. The Green Hill Road bridge crosses the river just north of a potential oxbow in the river, which might be a factor in flooding events and road safety. Any catastrophic event involving the Green Hill Road bridge would obviously have a negative impact on the river.

Finally, as the Barrington Planning Board works through proposed inspection and maintenance schedules for the stormwater structures, the members of the Isinglass River Local Advisory Committee would like to request that we be copied on maintenance reports submitted to the Town and we would like to offer to be involved with inspections

(accompanied by the applicant's engineers) of the stormwater structures, during both the construction and the excavation phase of the project.

We thank you for the opportunity to provide some preliminary comments on the plan set, and we hope to continue to work with all the parties as this project undergoes further review. We would request that the IRLAC receive copies of any additional materials that the applicants might provide during the review phase so that we will be able to provide our final comments on the proposal in a timely manner.

Thank you,

Elizabeth Evans, Chair
IRLAC

cc: Jackie Colburn, Rivers Coordinator
Jason Hill, TF Moran Inc.