

BARRINGTON
BROOKFIELD
DOVER
DURHAM
FARMINGTON
LEE
MADBURY
MIDDLETON
MILTON



NEW DURHAM
NEWMARKET
NORTHWOOD
NOTTINGHAM
ROCHESTER
ROLLINSFORD
SOMERSWORTH
STRAFFORD
WAKEFIELD

Date: December 21, 2012

Re: Development of Regional Impact - Trinity Conservation, LLC, Proposed Gravel Excavation Project

Dear Committee Members:

Per NH RSA 36:55, a Development of Regional Impact means any proposal before a local land use board which in the determination of such local land use board could reasonably be expected to impact on a neighboring municipality, because of factors such as, but not limited to, the following:

- I. Relative size or number of dwelling units as compared with existing stock.
- II. Proximity to the borders of a neighboring community.
- III. Transportation networks.
- IV. Anticipated emissions such as light, noise, smoke, odors, or particles.
- V. Proximity to aquifers or surface waters, which transcend municipal boundaries.
- VI. Shared facilities such as schools and solid waste disposal facilities.

Per the Town of Barrington, on October 2, 2012 a declaration of potential regional impact was approved by the Planning Board for the Trinity Conservation, LLC, Site Plan application for a proposed Gravel Excavation Project (Tax Map #210, Lot 57) with access from abutting lot (Tax Map #210, Lot 44) located on Green Hill Road in the General Residential (GR) Zoning District.

The Town of Barrington formally notified Strafford Regional Planning Commission (SRPC) and abutting communities of said **Development of Regional Impact** on October 19, 2012. On December 11, 2012, SRPC received one (1) full sized plan set, one (1) 11x17 reduced plan set, one (1) Stormwater Management Report (which includes the project's State of New Hampshire Alteration of Terrain (AOT) permit application, Natural Heritage Bureau (NHB) Data Check Results correspondence letter and species reports, on-site Natural Resource Conservation (NRCS) Web Soils Survey, Groundwater Recharge Volume (GRV) Calculation report and pre/post Soils Color Map), one (1) Pre & Post Development Drainage Plan, and correspondence letters from both the applicant's engineering consultant and the Town of Barrington's third party engineering consultant.

Traffic-Access-Parking:

1. Will the development cause an increase in traffic that will diminish the capacity or safety of the street system in the adjacent town/city?

According to the Trip Distribution notes on sheet 2 of the submitted plans, the assumption has been made that Normal operational activity will generate 10 loads per day (or 20 trips), with a Maximum output of 30 loads per day (or 60 trips). However, the Summary states that the Average Daily activity is 60 trips. Please clarify.

We concur with the December 11, 2012 TF Moran correspondence letter, in which the applicant cites NHDOT traffic volume data. Green Hill Road experiences approximately 2000 trips per day. The proposed project and associated truck traffic will represent a 3% increase in current traffic volumes.

According to the December 11, 2012 TF Moran correspondence letter, the applicant states that a maximum of 25 cubic yards will be leaving the site per haul using a combination of tri-axle dump and tractor trailer dump trucks. Assuming that one cubic yard is approximately equal to 1.3 tons, we can expect the regular transport of up to approximately 32.5 tons from the site per haul. According to Barrington municipal staff, Green Hill

Road was constructed using six inches of base material. It is reasonable to anticipate that the proposed heavy truck traffic will negatively impact the integrity of the roadway and will likely contribute to additional maintenance costs. Attention should be given to this issue in order to protect the Town, residents and regional commuters.

The October 24, 2012 Memorandum from Dubois & King, the Town's third party engineering consultant, states that the District 6 Bridge Engineer, Stephen Liakos, informed the municipality that a structural calculation could be performed to determine the anticipated impacts on the bridge structure. As stated above, the project calls for a combination of tri-axle dump and tractor trailer dump trucks. We concur with Mr. Liakos and recommend the Town pursue this impact data now that truck size information has been submitted.

While the proposed project does not constitute a significant increase in daily traffic on Green Hill Road, and we agree that "One Lane Bridge Ahead" signs, potential speed limit reduction, stop bars and proposed boring program for the roadway will have some positive safety implications. However, this roadway is not typically used for heavy truck traffic. Large vehicles are not designed to be as maneuverable as cars; they take longer to stop and accelerate, and because of their size, they often need to swing wide to make their turns. With this in mind, we find it reasonable to anticipate negative roadway safety impacts for residential pedestrian traffic on Green Hill Road during material transport.

2. Will the development exceed, either individually or cumulatively, a level of service standard established by the adjacent town/city for designated roads or highways?

There is no specific information about level of service. The existing traffic volumes are discussed in the prior section.

3. Will the development substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., construction, gravel operation equipment)?

Gravel operations are a permitted use within the General Residential (GR) Zoning District. Compliance is achieved through adherence to the Performance Standards specified in Section 7.1 of the Municipal Zoning Ordinance, and the requirements specified in the Town's Site Plan Regulations. The Planning Board may require an undisturbed and/or vegetated buffer of suitable size be maintained between an excavation site and any adjoining properties if said properties would be adversely impacted by such an operation. In addition, the project proposes to upgrade the gravel drive used to access the project site (Map 201 Lot 57) by expanding its width to 18 feet in compliance with the Barrington Subdivision Regulations.

On page one (1) of the December 11, 2012 TF Moran correspondence letter, the ultimate site limit distance to Stillwater Circle residences will be **200 feet**. On page two (2) of the letter, Revised Statutes Annotated (RSA) 155-E is referenced under the heading Buffers and explains how the applicant will adhere to this statute. The letter states "RSA 155E requires the applicant provide a 50 foot buffer zone from abutting properties and the Isinglass River. A generous **75 foot vegetative buffer** will be provided along the northerly property line of parcel 210-57. Additionally, the applicant owns a strip of land, ranging **up to 70+/- feet wide, between the site and the Stillwater Circle development which will be utilized to provide an additional buffer zone to the excavation site**".

The comment is referencing the **Minimum and Express Operational Standards** under RSA 155-E:4-a(II)(II-a). RSA 155-E:4-a(II) states "*No excavation shall be permitted within 50 feet of the boundary of a disapproving abutter, within 150 feet of any dwelling which either existed or for which a building permit has been issued at the time excavation is commenced*".

After a review of the December 11, 2012 TF Moran correspondence letter, and sheet 8 of the submitted plans with a 1" = 200' scale, it appears as though the ultimate site limits and associated clearing and grading will extend well within the stated 200' vegetative buffer to Stillwater Circle. Please clarify buffer distances.

Considering the proposed blasting, crushing, hauling and heavy equipment operation on-site, we recommend an adjustment to the ultimate site limits to provide suitable vegetative buffering in excess of the proposed 200' as allowed by the Barrington Zoning Ordinance.

4. Will the development result in inadequate emergency access?

Note #4 on sheet 10 of the submitted plans, under General Notes, states that the contractor shall maintain emergency access to all areas affected by his work at all times.

It does not appear that the submitted plans include an emergency access provision for review. An existing paved driveway will be utilized as the access point to the site and a sight line plan and profile will be prepared for the Planning Board prior to final approval. The Municipal Road Agent and Public Safety personnel will also provide input to the Planning Board regarding any potential site access issues.

5. Will the development result in inadequate parking capacity?

We do not anticipate the project to have any parking capacity implications.

6. Will the development conflict with adopted policies, plans, or programs supporting alternative transportation?

We do not anticipate the project will conflict with any adopted policies, plans or programs supporting alternative transportation. As stated under question #1, we find it reasonable to anticipate negative roadway safety impacts to alternative modes of transportation (i.e., bicycles, pedestrians etc.) on this residentially zoned roadway.

Conflicts with Policies, Plans and Programs

Noise:

7. Will the development expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?

Under Barrington Zoning Ordinance Article 7.1.2 Noise, all noise, except that generated by normal human or vehicular activity, shall be muffled so as not to be objectionable due to intermittence, beat frequency or shrillness. At property lines, noise levels shall not exceed 75 DBA.

It is important to note that during the winter months, noise levels from construction activities will lack the vegetative buffer present during the growing season. According to the Winter Construction Notes on sheet 10 of the submitted plans, winter excavation and earthwork will be performed as such that no more than 1 acre of the site should go without stabilization at one time. Will crushing and/or blasting activities occur during the winter months?

The December 11, 2012 TF Moran correspondence letter states that the project will not generate noise levels exceeding 75 DBA at the abutting property lines. The same paragraph goes on to state that based on the relative distance from the ledge to the abutting residential properties the operations are not expected to generate significant noise impacts to these areas. Please clarify if the possibility for noise nuisance to abutting

residential properties exists. Will a decibel meter be utilized on site to measure the actual DBA readings at the property lines during initial blasting activities and crushing activities to follow?

In order to alleviate potential complaints and noise nuisance issues, we recommend supplying abutting property owners with a 48 hour notice before each day scheduled for blasting. We further recommend that the Town require an adjustment to the ultimate site limits to provide additional suitable vegetative buffering to these residences as allowed by the Barrington Zoning Ordinance.

- 8. Will the development expose persons to or generate excessive ground borne vibration or ground borne noise levels?**

The December 11, 2012 TF Moran correspondence letter states that “normal excavation operations are not expected to generate significant vibration. The applicant expects blasting areas to be limited to the western portions of the property in areas where there is currently ledge face. This area is approximately 1,700 feet from Green Hill Road, 1,200 feet from the Isinglass River, 2,300 feet from Jessica Drive and 650 feet from the rear of the Stillwater Circle properties. Based on the relative distance from the ledge to these properties the operations are not expected to generate significant noise impacts to these areas”.

Without a Noise and Vibration Control and Monitoring Plan (NVCMP), and associated implementation of vibratory equipment/methods, how will the actual ground borne vibration levels generated during blasting and crushing activities be measured to ensure the above assertion is correct?

- 9. Will the development substantially and permanently increase ambient noise levels in the project vicinity above existing levels?**

See Sections above on NOISE.

- 10. Will the development substantially increase temporary or periodic ambient noise levels in the project vicinity above existing levels?**

See Sections above on NOISE.

- 11. Is the development located within an airport zone or within two miles of an airport or airfield, where the project would expose residents or employees in the project area to excessive noise levels?**

The project site is not within two-miles of an airport or airfield.

Hazardous Materials or Substances:

- 12. Will the development create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

It can be anticipated that incomplete reactions are likely to occur during blasting activities and will result in the production of hazardous substances such as carbon monoxide (CO), nitrous oxide (NO) and nitric oxide (NO₂). In addition, incomplete reactions may result in molecule fragmentation of the ingredient explosives, oxidizers, or fuels which may also be toxic.

The December 11, 2012 TF Moran correspondence letter states that the operator will be required to identify a drinking water wells located within 2000 feet of the proposed blasting activities, as well as to develop a groundwater quality sampling program to monitor for nitrate and nitrite either in the drinking water supply

wells or in other wells that are representative of the drinking water supply wells in the area. The plan also calls for pre/post blast water quality monitoring subject to approval by NHDES prior to initiating blasting activities. Additionally, the letter provides a list of Best Management Practices (BMPs) to be implemented for blasting activities. This list of BMPs includes various procedures including, but not limited to, loading practices, spillage, fuel storage, Muck Pile management, and explosives management etc.

The project proposes to disturb an area in excess of 100,000 square feet and therefore requires an Alteration of Terrain (AOT) permit from the NH Department of Environmental Services (NHDES). The AOT permit ensures that certain BMPs be adhered to and that stormwater is adequately treated prior to leaving the site. BMPs for the on-site excavator will be required as well.

Under Federal Law, the site operator will be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) and a Spill Prevention and Countermeasures Plan (SPCC) to address potential contamination concerns. The site operator will also be required to attend regular compliance hearings with the Barrington Planning Board to ensure conformance to the approved plan and permit conditions.

There appears to be a discrepancy between the **Phasing Note** on Sheet 3 of the submitted plans and note **#9** on under **General Notes** on Sheet 10. The phasing note states that the operation will be performed in such a manner so as to disturb no more than 10 acres at a time. **General Note #9** states that the smallest practical area shall be disturbed during construction, but in no case shall it exceed 5 acres at any one time before disturbed areas are stabilized. Please clarify and/or amend plan notes.

We think the level of attention given to the prevention of significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials associated with this project is adequate as described.

- 13. Will the development create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

We think that the level of attention given to the prevention of significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous material to the environment to be adequate as described.

- 14. Will the development produce hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

No, the development is not within one-quarter mile of an existing or proposed school.

- 15. Will the development be located on a site that is included on a list of hazardous materials sites compiled by the NH Department of Environmental Services and, as a result, would it create a significant hazard to the public or the environment?**

No, the development is not located on a site that is included on a list of hazardous materials sites compiled by the NH Department of Environmental Services.

Ecology and Resources:

- 16. Will the development have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the U.S. Fish and Wildlife Service?**

A review of the Natural Heritage Bureau's (NHB) Data Check Tool shows that there are NHB records of rare plants and/or exemplary natural communities in the vicinity of the project site which may be adversely impacted by project implementation. Specifically, Wood turtle, a NH species of concern, was identified in the NHB database check as being in the vicinity of the project site. According to NHFG, both the Wood turtle and the state endangered Blanding's turtle may be found in and around abandoned pit areas. As recommended by NHFG staff, project personnel working on the job site should be made aware of the potential to encounter protected turtles in the work area especially during turtle nesting season which extends from late May through the end of June. If Blanding's or other protected turtle species are found nesting in the work area, please contact NHFG.

The applicant has designated an area on-site to remain exposed gravel in order to provide nesting habitat for the above referenced turtle species. NHFG staff recommended that this preserved exposed gravel area be a minimum of 5-10 acres in size. What is the acreage of the referenced area to remain undisturbed by the proposed operations? After taking approximate measurements based on the scaled plans, I found this area to be roughly 4 acres in size.

While the applicant's provision of nesting areas for the above referenced state listed turtle species was included, a subdivision plan has been included with the submitted plan set which appears to propose at least four (4) residential building lots covering this preserved nesting area. Please amend the attached subdivision plan by including this preserved nesting area and an associated note in order to note and preserve this protected area during future potential projects on this property.

- 17. Will the development have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the NH Department of Fish and Game or US Fish and Wildlife Service?**

The State Designated Isinglass River makes up the easterly boundary of the project site (2008 Isinglass River Management Plan). RSA 438, New Hampshire Rivers Management and Protection Program, establishes the program policy, intent, definitions, nomination and management criteria for State Designated Rivers. The Isinglass River in the vicinity of the project site is listed as a Rural-community river (RSA 483:7-a) and the "river corridor" (RSA 483:4) means the river and the land area located within a distance of 1,320 feet of the normal high water mark or to the landward extent of the 100 year floodplain as designated by the Federal Emergency Management Agency, whichever distance is greater. It is important to note that the majority of the project site is located within the 1,320 foot designated river buffer. As such, it can be anticipated that some protection of the benefits of this buffer will be lost as a result of this project.

The project site is located along a section of the Isinglass River which has been deemed as exhibiting very high fluvial erosion hazard characteristics by the New Hampshire Geologic Survey (NHGS). NHGS and SRPC have previously met with the Barrington Planning Board and Conservation Commission to discuss the potential adoption of the state's template Fluvial Erosion Hazard Ordinance. The purpose of adopting fluvial erosion hazard (FEH) ordinance is to limit development in fluvial erosion hazard areas for the purpose of protecting public and private property, and public safety and welfare. Informed by geomorphic channel assessment and management practices endorsed by the New Hampshire Department of Environmental Services (DES) and New Hampshire Geological Survey, this model fluvial erosion hazard ordinance recommends implementation of development requirements and standards that recognize a stream's natural evolution and range of stable conditions.

Ultimately, the most effective way to prevent hazards associated with fluvial erosion is *avoidance by limiting future human presence and investments in river corridors*. The objective of this type of zoning is to guide and encourage measures and improvements that provide increased property and infrastructure protection, and maintain or restore the hydrologic and geomorphic functions and economic values of river systems. The functions and values of healthy river systems include: flood mitigation, water supply, water quality, sediment storage and transport, aquatic habitat, recreation, transportation and aesthetic qualities.

The NHDES Shoreland Water Quality Protection act maintains a protected 250 foot vegetated buffer along the Isinglass River. The adherence to this protected buffer, and conformance with Article 11 of the Barrington Zoning Ordinance, Shoreland Protection District Overlay (SDO), will retain some riparian habitat.

On Sheet 3 of the submitted plans, it appears that the rip/rap outlet structure is shown to be slightly within the 250 Shoreland buffer. It can be anticipated that construction activities will likely further impact this buffer. Recommend re-designing the outlet structure to be pulled back from this buffer in order to allow for compliant construction activities outside of the 250 foot buffer.

- 18. Will the development have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No substantial adverse impact to federally protected wetlands as defined by Section 404 of the Clean Water Act will occur as a result of this project. No impacts to wetlands of any size or under any jurisdiction will be impacted by the project.

- 19. Will the development interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

According to NHFG and NHB records of rare plants and/or exemplary natural communities in the vicinity of the project site, both the Wood turtle and the state endangered Blanding's turtle may be found in and around abandoned pit areas. The applicant has designated an area of approximately 4 acres on-site to remain exposed gravel in order to provide nesting habitat for the above referenced turtle species. NHFG staff recommended that this preserved exposed gravel area be a minimum of 5-10 acres in size.

As recommended by NHFG staff, project personnel working on the job site should be made aware of the potential to encounter protected turtles in the work area especially during turtle nesting season which extends from late May through the end of June. If Blanding's or other protected turtle species are found nesting in the work area, contact NHFG.

- 20. Will the development conflict with any local policies or ordinances protecting biological resources, such as a conservation easement, tree preservation policy or ordinance?**

We do not anticipate the project to conflict with any local policies or ordinances protecting biological resources.

- 21. Will the development conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?**

We do not anticipate the project will conflict with any provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

22. Will the development have a substantial adverse effect on Groundwater Quality?

The applicant's submitted Alteration of Terrain Permit (AOT) Application lists under section "L" that the project is not within a State Groundwater Protection Area (GPA).

While we do not have any specific data to verify this GPA determination, the project site is located within the Town of Barrington's Groundwater Protection Overlay District. However, the applicant has taken the proper steps to address potential groundwater contamination with regard to required activities to identify drinking water wells located within 2000 feet of the proposed blasting activities, as well as the development of a groundwater quality sampling program to monitor for nitrate and nitrite either in the drinking water supply wells or in other wells that are representative of the drinking water supply wells in the area.

We have reviewed the Pre/Post-Development Drainage Plans, stormwater methodology and groundwater recharge descriptions. The Town's third-party engineering consultant will formally review the applicant's data prior to final approval.

23. Will the development have a substantial adverse effect on Air Quality?

According to the December 11, 2012 TF Moran correspondence letter, the operation is not expected to produce or create detrimental odors or significant smoke. The plans include specifications which require the operator to control fugitive dust. Will a water truck be stationed on-site during the growing season or during drought conditions?

Hazards-Public Health and Safety:

24. Will the development expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides or flooding?

The December 11, 2012 TF Moran correspondence letter states that the project work area is not proposed to be within the on-site Isinglass River floodplain limits. In addition, we have been informed that topography onsite provides a natural berm between the site and the river. Therefore, we do not anticipate the development will expose people or structures to any adverse impacts.

The project site is located along a section of the Isinglass River which has been deemed as exhibiting very high fluvial erosion hazard characteristics by the New Hampshire Geologic Survey (NHGS). See item #17 above.

25. Will the development result in substantial soil erosion or the loss of topsoil?

Yes. This project will result in substantial loss of topsoil and will likely result in some soil erosion during operations. The applicant has devised an erosion control system comprised of stone check dams, slope stabilization blankets, rip/rap, aggregate construction entrance, perimeter silt fencing and temporary sedimentation basin equipped with a sediment forebay with a depth of one (1) foot.

Note #8 on Sheet 4 of the submitted plans states "The contractor shall be responsible for installing and maintaining all erosion and sediment control devices necessary to control erosion throughout the duration of the project in accordance with applicable NHDES/EPA standards". While silt-fencing is an acceptable

control, we recommend utilizing stump pulp berms, silt sock or hay bale perimeter controls instead of silt fencing. We find that silt fencing is easily compromised and is often times left to deteriorate on-site after project completion.

- 26.** Will the development be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

After a review of the NRCS Strafford County Soils data layer (See attached *Soils & Aquifer Areas map*), we found the subject lot to be comprised of a mix of Hollis-Charlton, Hinckley Loamy/Gravelly and mixed alluvial soils very similar to the applicant's Web Soils Survey report.

The potential for on/off site landslides, lateral spreading, subsidence, liquefaction and/or collapse is unlikely based on soil types, presence of NHDES Alteration of Terrain Bureau performance oversight, and variety of erosion control technology available to on-site construction and engineering staff.

- 27.** Will the development be located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No. The project does not propose the installation of utilities.

Facilities:

- 28.** Will the development require new or expanded public facilities or services in the adjacent municipality in order to maintain acceptable service ratios, response times or other performance standards for any of the following public services?

- **Fire protection?**
No new or expanded fire protection services are anticipated in the adjacent municipality as a result of this project.
- **Police protection?**
No new or expanded police protection is anticipated in the adjacent municipality as a result of this project.
- **Schools?**
No new or expanded school services are anticipated in the adjacent municipality a result of this project.
- **Parks?**
No new or expanded public park services are anticipated in the adjacent municipality as a result of this project.
- **Solid Waste**
No new or expanded solid waste services are anticipated in the adjacent municipality as a result of this project.
- **Other public facilities**
No new or expanded public facilities are anticipated in the adjacent municipality as a result of this project.

- 29.** Will the development cause an increase in new or expanded utilities, treatment facilities, storm water, water supplies, etc., that would result in a negative financial or environmental impact to the adjacent municipality?

Not anticipating this project will cause an increase in new or expanded utilities, treatment facilities, storm water, water supplies, etc., that would result in a negative financial or environmental impact to the adjacent municipality.

Scenic and Visual Character:

30. Will the development convert Prime Farmland to non-agricultural use?

No. This proposed gravel excavation project will not impact prime farmland (see attached *Soils map*).

31. Will the development conflict with existing zoning for agricultural use?

The project will not conflict with existing zoning for agricultural uses as the Town of Barrington does not zone for agricultural uses.

32. Will the development involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No. This proposed gravel excavation project will not impact prime farmland (see attached *Soils map*).

33. Will the development have a substantial adverse effect on a scenic vista?

We do not anticipate that the proposed project will have a substantial adverse visual impact from the Green Hill Road. However, it is possible that scenery from surrounding elevations will be negatively impacted.

34. Will the development substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No. The project is not located on a state scenic highway.

35. Will the development substantially degrade the existing visual character or quality of the site and its surroundings?

As the project site is set far back from Green Hill Road, and vegetated buffers will be present on all property boundaries, we do not anticipate degradation of the existing visual character surrounding the site within the Barrington municipal boundary.

It can be anticipated that the project site will no longer exhibit the current visual characteristics once operations commence when viewing the property from the Still Water Circle residential subdivision in Rochester (see attached pictures).

36. Will the development create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project will not be operating after dark during the growing season and therefore is not anticipated to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area during this time. However, the project proposes to operate to some capacity during the winter months which will necessitate alternate operation hours in order to alleviate potential sources of glare created by machinery on-site. We recommend operating hours from October through March be from 8:00 AM to 4:00PM.

37. Will the development conflict with any applicable land use plan, policy, or regulation including, but not limited to the master plan or zoning ordinance?

The project is located within Barrington's Groundwater Protection Overlay District. As previously stated, the applicant will be required to identify drinking water wells located within 2000 feet of the proposed blasting activities, develop a groundwater quality sampling program to monitor contaminants in the drinking water supply wells or in other wells that are representative of the drinking water supply wells in the area. The plan also calls for pre/post blast water quality monitoring subject to approval by NHDES prior to initiating blasting activities. Additionally, a list of Best Management Practices (BMPs) will be implemented for blasting activities which includes various procedures including, but not limited to, loading practices, spillage, fuel storage, Muck Pile management, and explosives management etc.

The applicant will be required to adhere to all requirements established by the municipal Planning Board and guiding documents and regulations. Gravel operations are a permitted use within the General Residential (GR) Zoning District; compliance is achieved with the Performance Standards specified in Section 7.1 of the Municipal Zoning Ordinance, and the requirements specified in the town's Site Plan Regulations are adhered to. The Planning Board may require an undisturbed and/or vegetated buffer of suitable size be maintained between an excavation site and any adjoining properties if said properties would be adversely impacted by such an operation. In addition, the project proposes to upgrade the gravel drive used to access the project site (Map 201 Lot 57) by expanding its width to 18 feet in compliance with the Barrington Subdivision Regulations.

Federal Storm Water Pollution Prevention Plan (SWPPP) and Spill Prevention Control and Countermeasures (SPCC) plan will be required for this project as well.

38. Will the development conflict with any applicable habitat conservation plan or natural community conservation plan?

The Isinglass River Management Plan (2008) was prepared in order to advocate for a management approach which is focused on protecting and conserving the rivers many resources, protecting riparian and aquatic habitat, preserving and improving water quality and quantity, to sustain aquatic and recreational resources while balancing the development of land and water uses with other public needs within the river corridor and watershed.

The December 11, 2012 TF Moran correspondence letter states that the Isinglass River Local Advisory Committee has been provided a copy of the NHDES permit application package and will be involved in the review of this project. We support this collaboration and highly recommend the applicant review the management plan in order to maximize the protection of the river corridor and the natural communities which depend on it.

Additionally, the Barrington Natural Resource Inventory Report (2009) encourages the Town to support the implementation activities stated within the Isinglass River Management Plan.

The *New Hampshire Wildlife Action Plan* (WAP) lists the subject lot as being located within an area deemed as supporting the "Highest Ranked Habitat in the Biological Region" and "Supporting Landscapes" (see attached *Wildlife Protection Areas map*).

Housing and Population Growth:

- 39.** Will the development induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project does not induce substantial population growth in this area, either directly or indirectly.

- 40.** Will the development displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The proposed project does not displace substantial numbers of existing housing necessitating replacement housing elsewhere.

- 41.** Will the development displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No. We do not anticipate that this project will result in the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere.

- 42.** Is the development compatible with existing or planned cross border development?

The City of Rochester is the closest abutting community to the project site. The only cross-border development is a residential subdivision known as Still Water Circle located within Rochester's Agricultural Zoning District.

Considering the proposed time schedule (Phase 1 & 2 proposed to last at least two (2) years each – Total duration of project expected to last a minimum of 12 years), use of heavy machinery, blasting, crushing and hauling activities, and the proposed 200 foot vegetated buffer between the ultimate limit of the project site and Still Water Circle residences, the project is opposes the existing cross-border development.

Rochester City staff and residents will be able to discuss potential concerns at the public hearing on January 8, 2012 at 7:00pm in the Early Childhood Learning Center.

Please contact Greg Jones, Regional Planner, should you have any questions at 994-3500 or gjones@strafford.org

Sincerely,

Strafford Regional Impact Committee Members

Edmund Jansen, Rollinsford
Sandra Keans, Rochester
Tom Clark, Dover
Brandon Anderson, Durham

cc: City of Rochester – City Council, Planning Board
City of Dover – City Council, Planning Board
Trinity Conservation, LLC
TF Moran Inc.