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NEW DURHAM
NEWMARKET
NORTHWOOD
NOTTINGHAM
ROCHESTER
ROLLINSFORD
SOMERSWORTH
STRAFFORD
WAKEFIELD

March 8, 2021

Re: **Preliminary Review** - Development of Regional Impact – Nottingham Planning Board Case #21-003-SIT; Kubota Trust

Dear Members of the Nottingham Planning Board:

Please accept this testimony on behalf of the Strafford Regional Planning Commission (SRPC) in response to your February 10, 2021 declaration that potential for regional impact exists with regard to the aforementioned application. 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.

SRPC received formal notice from the Town of Nottingham of said *Development of Regional Impact* on February 11, 2021. We understand that notices were also sent to the Town of Raymond and the Town of Epping. SRPC received a copy of the proposed site plan via email from Scott Frankiewicz of New Hampshire Land Consultants on February 17, 2021 and has also reviewed draft meeting minutes for the February 10, 2021 meeting of the Town of Nottingham Planning Board and other application materials as available on the Town of Nottingham web page for that meeting. We understand the application as a request for site plan approval to conduct Watercross events (typically 2-3 days per event) up to three times a year on a property that currently contains both a private residence and an existing gravel excavation located on NH Rt. 156 in the "Residential/Agricultural" zoning district.

Developments of Regional Impact that are referred to SRPC are considered by SRPC's Regional Impact Committee, a volunteer board consisting of SRPC commissioners. SRPC staff determined that a quorum of this committee could not be convened prior to the next meeting of the Nottingham Planning Board. The Chair of the Regional Impact Committee has therefore authorized SRPC staff to submit the following comments without holding a public meeting of the Regional Impact Committee.

Transportation, Access, and Parking

Comments: The original application materials do not appear to provide anticipated attendance figures. Written communication from the applicant indicates approximate attendance of 1000 spectators over a three day event plus 20-25 workers and roughly 100 racers and others associated with the event.

A traffic count conducted in 2020 estimates Average Annual Daily Traffic (AADT) of 2,866 trips on NH Rt. 156 at the Raymond town line (all AADT figures are 2-way figures). The estimated 1125 people associated with an event would represent a 40% increase to this figure if they all arrived on a single day – spread over 2-3 days the impact would be far less noticeable. These trip figures compare to AADT of 9,586 trips on Rt. 4 at the Nottingham/Barrington town line, 17,159 trips on Rt. 125 just south of Hedding Rd., and 44,658 trips on Rt. 101 east of Depot Rd./Beede Hill Rd. Therefore the traffic impacts on the larger transportation network will be absorbed more easily than any localized impacts in the immediate vicinity of Nottingham and Raymond.

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Conflicts with Policies, Plans, and Programs - Noise

Comments: Any event that involves operation of motorized equipment, especially in large numbers, is likely to generate additional noise. However, it should be noted that the subject site contains an existing sand and gravel excavation, which would be expected to involve a certain amount of noise from trucks, machinery, and potentially periodic blasting under existing conditions. Aerial imagery shows low-density residential development along Rt. 156 in both Raymond and Nottingham. Any noise restrictions in place in the Town of Nottingham would equally protect abutters in Raymond – we defer to the other abutting municipalities identified in the regional impact referral regarding the precise extent to which noise patterns would be altered by periodic Watercross events and whether any noise ordinances or other regulation in their communities would otherwise prohibit an event of this type.

Hazardous Materials or Substances

Comments: Parking and circulation areas can be sources of non-point-source pollution if vehicles leak oil, coolant, or other contaminants. Similarly, if it is reasonably anticipated that fueling of snowmobiles will occur on site, small leaks or spills could occur as a result. The Nottingham Planning Board may wish to consider whether areas designated for vehicle parking, camping, and fueling are sufficiently separated from surface water bodies to allow any runoff from these areas to infiltrate and be treated before releasing into the surface water. Watercross would also include potential for an accident involving a snowmobile close to or in the surface water itself; such an accident could result in direct release of vehicle fluids or metals directly into the water. We defer to the Nottingham Planning Board to assess the likelihood of such an accident as compared to other permitted activities such as boating. The applicant has indicated that only dry camping will be permitted in association with the proposed events – this limitation should be made explicit in plan notes and/or conditions of approval to facilitate enforcement and avoid additional nutrient loading on site.

Ecology and Resources

Comments: Surface water maps show the Pawtuckaway River and minor tributaries crossing on or adjacent to this property; these in turn are tributaries of the Lamprey River. As discussed above, these surface water bodies can be sensitive to pollution via runoff. The Lamprey River Advisory Committee may have information regarding the watershed and its habitats on their website at <https://www.lampreyriver.org/>.

SRPC staff also understands that particularly intensive snowmobile traffic through a jurisdictional wetland may constitute a wetland impact requiring a permit from the NHDES wetland bureau. While those permits typically seem to apply principally to high-traffic trails used year-round, the applicant may wish to confirm with NHDES that no such permit is required in this case.

While some loss of topsoil or sedimentation may occur, this site is also used as a sand and gravel excavation; the interplay between these operations should be considered, including whether approval of this proposal would violate any existing conditions of the sand and gravel operation, including any required erosion control measures or reclamation plan.

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Hazards – Public Health and Safety

Comments: No aspect of this proposal appears to increase the likelihood of flooding, landslide, or other reasonably anticipated event, particularly when considered regionally.

Facilities

Comments: The proposed operation does not appear to require expansion of any public facility in adjacent municipalities.

Scenic and Visual Character

Comments: The application does not appear to alter the scenic or visual character of the broader region. We defer to Nottingham and the abutting municipalities regarding interpretation of any impacts to their own scenic and visual character as a result of this proposal.

Housing and Population Growth

Comments: No residential development is proposed, nor would any existing residential units be displaced by this proposal. Nearby properties along Rt. 156 are developed with low-density residential development of a similar nature in both Nottingham and Raymond. The potential for noise impacts to these properties has been discussed above.

We hope that these comments will be useful to you in your review of this project. All materials should be used for informational purposes only. The scope of SRPC's review is intended to focus on the regional impacts of this application, and does not duplicate the Nottingham Planning Board's review for consistency with Town ordinances and regulations. Similarly, references to land use policies in referenced municipalities are not the result of a comprehensive regulatory review, and SRPC defers to these municipalities to provide more comprehensive feedback regarding consistency of the proposed development with their regulations and with the character of their community. Please do not hesitate to contact James Burdin at JBurdin@strafford.org or 603-994-3500 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "James E. Burdin".

James E. Burdin, AICP
Strafford Regional Planning Commission