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Peter Britz, Environmental Planner
Portsmouth Planning Department
1 Junkins Avenue
Portsmouth, NH 03801

December 9, 2019

RE: Second Review of Technical Report of Wetlands Functions and Values and Wildlife Habitat Assessment for Banfield Road Project Green and Company Portsmouth

Dear Peter:

West Environmental, Inc. (WEI) submits this second review report of the above referenced project based on receipt of the following documents submitted for a Conditional Use Permit:

1. Cover for F & V Forms amended 11-18-19 prepared by Jim Gove GES
2. Revised Wetland Function and Values Evaluation Forms GES
3. Aerial Photo Plan with F&V Areas GES
4. 2019 Vernal Pool Assessment GES
5. Draft Impact of Septic Systems on Wetlands and Impact of Project on Wildlife amended 11-18-19 compiled by Jim Gove GES
6. Wildlife Habitat Assessment 11-29-19 prepared by Luke Hurley GES
7. Wetland Impact Plan with Wildlife 11-5-19
8. Potential Wildlife Movement Map

In addition, Mark West walked the site on 11-11-19 with Brenden Walden of GES.

Wetlands

The wetlands on the site were separated into three areas. The revised Function and Values Data Forms and Aerial Photo Map identify each wetland area evaluated.

Wetland A(east) - This wetland appears to have a fair amount of diversity with the powerline creating scrub-shrub and emergent plant communities as well as red maple swamp and white pine dominated swamp. WEI agrees with the functions attributed to this wetland.

Wetland A (west) WEI agrees with the functions attributed to this wetland.

Wetland B WEI agrees with the functions attributed to this wetland, but we believe that this wetland has the potential to also provide some sediment/toxicant retention function based on its landscape position and the potential impacts associated with site development.

Most of the wetland and buffer impacts are to Wetland A(west) for the road crossing. There are impacts to the buffers of Wetlands A(east) and Wetland B for the road connecting the southern development envelope with the northern development envelope.

Vernal Pools

The 2019 Vernal Pool Assessment provides new information indicating that Areas 1 and 2 are not functioning vernal pools. WEI inspected both areas during our site walk and agrees with this determination. Area 3 was not assessed because it is off site however this pool appeared to have the greatest potential. The closest development to this pool is approximately 170 feet. Area 4 is too far away from any development. A photo of a wood frog is included in the wildlife study but not listed under observed species.

2019 Wildlife Habitat Assessment

The revised Wildlife Habitat Assessment provides more information on wildlife habitat and the species that likely utilize this site. New observations include *“A parcel like this one, within a larger undeveloped block of land, has a high potential for use by wildlife, based on the cover types, wetland areas on and adjacent to the site, undeveloped corridors to travel to and from areas of denning and foraging and the presence of food sources from those of primary producers through plants, to primary and secondary consumers of insects and small mammals, reptiles and amphibians and deer, to tertiary and quaternary consumers through various weasel, canine and birds of prey species.”* In addition, there is discussion of a variety of bird species that use both the forest interior where development will occur and the scrub shrub wetlands habitat which will mostly be protected. WEI agrees with the statement *“The greatest issue with this development is the bisecting of the site with the proposed road, limiting any existing and potential wildlife travel.”* While the ecopassages crossing structure will help some species continue to move through the wetland the development itself and the large retaining walls in the stretch of road connecting the two development areas **will permanently impact wildlife movement on the site**. WEI did not receive any drawings of the retaining wall height, cross-sections or open box culvert details identified in the report including its location.

The proposed development is in an intact forest dominated by mature red oak and notable for significant areas of rock outcrop. This property is part of a large block of undeveloped land over 900 acres in size that includes the Great Bog Conservation Easement. A map of the wildlife action plan designation of habitats is attached. Significant portions of the site are identified as supporting landscapes and the northern development envelope borders highest ranked habitat in the biological region.

Impact of Septic Systems on Wetlands and Impact of Project on Wildlife

This report indicates that there will be no impacts to wetland functions from the septic systems for 22 houses. WEI recommends that this should be independently evaluated by a licensed septic designer due to the amount of ledge and density of the development constructing 22 houses, roadways/driveways and associated septic systems within an estimated 8-acre envelope.

The report also includes a detail of the proposed ecopassage, but the location of the directional walls is unclear. Do they extend to Banfield Road and towards the first development area? The wing walls for each culvert are identified but the rest of the directional wall locations are unclear.

This report also discusses the barrier to wildlife movement created by the roadway where large retaining wall will house a stormwater detention area. An open box culvert is identified in this report but is not shown on plans received by WEI and no detail has been reviewed.

The sensitivity of the site based on high wildlife habitat value and the density of the development require the need to balance the amount of development to protect the existing habitat.

Sincerely,
West Environmental, Inc.

A handwritten signature in black ink, appearing to read 'Mark C. West', with a long horizontal stroke extending to the right.

Mark C. West,
NH Certified Wetland Scientist

Cc: Vicky Nelson

