

# Lamprey River Advisory Committee



c/o 88 Hedding Road  
Epping, NH 03042  
[www.lampreyriver.org](http://www.lampreyriver.org)

*Protecting the Lamprey, Little, North, North Branch, Pawtuckaway, and Piscassic rivers  
that connect our fourteen communities*

Barrington, Brentwood, Candia, Deerfield, Durham, Epping, Exeter, Fremont,  
Lee, Newfields, Newmarket, Northwood, Nottingham, Raymond

February 22, 2023

Mr. Ridge Mauck  
NHDES  
PO Box 95  
Concord, NH 03302-0095

Re: 307 Electric Transmission Line Maintenance Project  
multiple towns including Barrington, Deerfield, Durham, and Nottingham  
NHDES File Number: 230213-034

Dear Mr. Mauck:

The above-referenced project is within the quarter mile corridors of the Little and North rivers and is, therefore, subject to review by the Lamprey River Advisory Committee (LRAC) in accordance with NHRSA 483. Upon final review, we offer the following comments:

1. Materials reviewed include Alteration of Terrain Permit Application signed and dated 1-26-2023, a series of 34 aerial view map-plans dated January 2023, and Natural Heritage Bureau Report dated 12-08-2022. Wetlands and Shoreland Permits are also required, but are not available to us at this time.
2. The applicant desires to upgrade existing power lines and replace 15 wooden electric towers with steel structures along the 307 Electric Transmission Line Right-of-Way. Most tower replacements will occur within 10 feet of existing structures, but will require the installation of gravel work pads measuring 100' x 100'. No tree removal is proposed. Total land disturbance will impact approximately 15.4 acres.
3. The Natural Heritage Bureau report indicates that 14 plant and 10 vertebrate species listed as special concern, threatened, or endangered occur within or adjacent to the powerline corridor. Site-specific reports and NHFGD recommendations were not provided. A vernal pool assessment has not yet been made, but will reportedly take place in the spring of 2023. We will want to see

that report when it becomes available, as well as recommendations from NHFGD.

4. The applicant proposes to commence work in April 2023 and complete work in November of 2023. This time frame is likely to increase the risk of disturbing plants and animals during their prime growing and reproductive seasons. If possible, timing this project for late fall and winter might be recommended.
5. The applicant notes that "Delineated wetlands intersecting the proposed project area exhibit characteristics typically found within a cleared and periodically maintained electric utility ROW setting." In our experience, this translates into areas that show significant environmental degradation because the sites were not properly restored with appropriate vegetation, the sites were left accessible to motorized vehicles, or both. Photo Number 2 supplied by the applicant clearly illustrates this issue. "Periodic maintenance" does not address erosion issues or inappropriate access by motorized vehicles. For these reasons, we urge NHDES to require that the applicant adhere to the following:

1. Engage an independent inspection agent at the proponent's expense who will be required to file daily, not weekly, reports with the NHDES during construction. This will ensure that the BMPs are properly installed before commencement of construction and that they are maintained properly until the close of the project.

2. Prior to the close of the project, install gates at construction access points to prevent access by unauthorized wheeled vehicles. Approval of this AoT application will grant the creation of access for necessary construction vehicles. When the project is complete, access roads will not be restored to their initial condition and will be left in an improved state, which will be inviting to off-road enthusiasts. This improved, created access is a direct result of the approval of the AoT; therefore, to minimize post-construction impacts to environmentally sensitive areas, part of the AoT approval should require gating at access points to minimize disturbance and erosion that could be caused by unauthorized use after the project is complete.

Thank you for the opportunity to comment on this project.

  
Joseph Foley, chair

CC: Tracie Sales, NHDES  
Barrington Conservation Commission, Planning Board  
Deerfield Conservation Commission, Planning Board  
Durham Conservation Commission, Planning Board

Nottingham Conservation Commission, Planning Board  
Sherrie Trefry, [strefry@vhb.com](mailto:strefry@vhb.com)