

Conservation Commission
RE: Article 10 Revisions
Meeting: June 14, 2023

Elizabeth Bratter
159 McDonough St
Property Owner

Dear Conservation Commission,

June 12, 2023

Thank you for taking the time to review and update Article 10! It definitely needed it. Thank you to all who have worked so hard on this. Here are some possible housekeeping thoughts to this project.

The chart found under **10.1018.21** is very helpful. Please consider referencing it earlier in Article 10. In 10.1014.23 it states: Wetland Buffers, including *no cut/vegetated buffer strips* and *limited cut areas*... These two descriptions, no cut/vegetated buffer strips and limited cut areas, are referenced quite a bit yet there is no clarification on what they are until almost the end of the Article. It could say: *Wetland Buffers, including no cut/vegetated buffer strips (0-50') and limited cut areas (50-100')*.... Without clarification earlier it makes it difficult to understand 'where' the ordinances listed are talking about.

10.1017.831 and **10.1017.832** appear to say the same thing in different ways, perhaps combine the two. The chart appears to say 3.0 to 1 and a 2.0 to 1 ratio. Would a 3 to 1 ratio and a 2 to 1 OR a 3.0 to 1.0 and a 2.0 to 1.0 ratio be a less confusing listing? *Just as a side note*: it doesn't seem clear what the ratios stand for, 3 sf of trees replace every 1 sf of impervious surface or , 3 trees to every 1 removed???

Under 10.1017 83 Wetland Protection Plan Standards, **10.1017.831(2)** it states: *no new impervious surface shall be within 50 feet of the wetland boundary*. What is the "wetland boundary", the no cut/vegetated buffer strip or the limited cut area or both? *It is NOT currently defined in Article 15*. Why isn't that the 100' wetland buffer? Why is "new impervious surface" being proposed to be allowed in the 100' buffer?

Wondering if **10.1018.23 (3)** may need to include hazardous and/or invasive trees, perhaps a separate clause to reflect on invasive trees. The larger Norway Maples may be okay but large invasive sumac may be something desired to have removed. Are any comments regarding invasive trees, shrubs, plants necessary here?

10.1018.10 speaks to stormwater management, this often comes with outfalls into wetlands. Would a clause regarding wetland restoration/protections as well as the amount of freshwater allowed to enter brackish and freshwater wetlands be something to add here as 10.1018.10 (3.). It is true that some areas sheet directly into wetlands however, the sheeting often is, in many cases, packed soil areas. Think of emptying a bucket all at once repeatedly in the same area of a wetland, outfalls can do the same thing. Best Management Practices are usually in regards to not overflowing the land. Please consider something that addresses critical issues with outfalls. The amount of freshwater, the speed at which it exits the outfall once released from detention reservoirs, the amount of fresh water into existing wetlands, restoration around all outfalls, shoreline stabilization and other critical issues. (IE: a man made wetland which then slowly drains into an existing freshwater wetland-as opposed to a direct outfall into an existing freshwater wetland)

<https://www.epa.gov/system/files/documents/2021-11/bmp-stormwater-wetland.pdf>

10.1017.50 (4) speaks of “*managed woodlands*”. Many lots have woodlands that are not managed, they just grow on a site naturally. These trees are not managed in any way and would not fall under a managed woodland definition, perhaps **the terminology could be changed to natural woodland**.

10.1017.33 discusses **independent “Certified Wetland Scientist”**. Many engineering firms have wetland scientists as part of their team and fall under the same company name. Independent should NOT be a scientist who works for the same engineering firm as the project team is using or who worked on a project before a new team was added due to a change in ownership. To get a true independent evaluation should they come from a different city? Could independent be more clearly defined?

I reviewed The Wetland Functions and Values as I said I would and found some great information provided by NHDES which may encourage less fluff in reports, however I have not been able to compile it all at this time. To be able to move these ordinances forward this idea will have to wait. I apologize but I am working on it.

Respectfully,

Elizabeth Bratter