

FINAL RESTORATION PLAN:

South Municipal Wellfield Superfund Site

Prepared by

**Lead Administrative Trustee: U.S. Department of the Interior,
U.S. Fish and Wildlife Service**

Cooperating Trustee: State of New Hampshire

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A. Introduction and Authority

Natural resource trustees representing the U.S. Fish and Wildlife Service/Department of the Interior (DOI), and the State of New Hampshire have prepared this Final Restoration Plan (Plan). This document describes the nature and extent of injuries to natural resources resulting from contamination at the South Municipal Wellfield Superfund Site, and identifies alternatives for restoring injured resources and the services these resources provide. This Plan is intended to inform the public of proposed restoration actions.

Executive Order 12580 and Subpart G of the National Contingency Plan, 40 C.F.R. Section 300.600, designate federal and state trustees for natural resources. The Secretary of the Department of the Interior is a designated federal trustee for natural resources including migratory birds, some marine mammals, anadromous fish, endangered species and their respective habitats, and federal lands managed by the Department. The Northeast Regional Director of the U.S. Fish and Wildlife Service has been designated as Authorized Official to act on behalf of the Secretary as trustee for this Superfund Site. The states are designated trustees for all natural resources within their jurisdiction. Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, natural resource trustees are authorized to assess and recover compensation for injury to or loss of natural resources resulting from a release of a hazardous substance.

The U.S. Fish and Wildlife Service and the State of New Hampshire are the natural resource Trustees for the South Municipal Wellfield Superfund Site. In a report to the Department of Justice dated October, 1994, the U.S. Fish and Wildlife Service determined that hazardous substances released at the Site caused injuries to migratory birds and their habitats, particularly wetlands, and sought compensation from the Responsible Party to restore those injured resources. In a 1995 settlement, the DOI received \$94,744 to implement one acre of wetland habitat restoration, including all costs associated with planning, restoration, and monitoring.

Prior to expending funds for restoration, CERCLA requires the Trustees to develop a publicly reviewed restoration plan (42 U.S.C. Section 9611(i)). The DOI Natural Resource Damage Assessment Regulations require that the plan list a reasonable number of possible alternatives for restoration, rehabilitation, replacement, and/or acquisition of equivalent resources and the services lost to the public associated with each injured resource (43 CFR, Sections 11.93 and 11.81, DOI Natural Resource Damage Assessment Regulations).

B. Background

The South Municipal Wellfield Superfund Site is situated in southern New Hampshire in the Town of Peterborough. The Site includes the 24-acre New Hampshire Ball Bearings, Inc. (NHBB) manufacturing facility, the now closed South Municipal Water Supply Well, and surrounding upland and wetland habitat.

The NHBB facility has operated as a ball bearing manufacturing plant since its construction in 1957. The primary contaminants of concern at the Site are those used in the manufacture of ball bearings. They include volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs). Contaminants are known to have been discharged to the exterior of the plant via floor drains and direct disposal activities. Elevated levels of VOCs were detected in water samples from a well, several surface water bodies in the area, and surface soils. Sediments from a wetland and small brook were contaminated with PCBs, PAHs and localized accumulations of heavy metals. Approximately one acre of wetland sediments contained PCBs and PAHs above cleanup levels.

Wetlands adversely affected by contamination from the Site include emergent, scrub/shrub, and open water types. These wetland types are used by numerous migratory birds, including wading birds and dabbling ducks. PCB and PAH contamination impaired wetland habitats and the services they provide, either through food web contamination, or through the reduction and/or loss of biological diversity and productivity. In turn, the impaired diversity and productivity adversely affected wetland-dependent wildlife, primarily migratory birds.

C. Public Notification and Review

CERCLA requires the Trustees to notify the public and any federal, state, or local agencies with special interests or expertise relating to the Plan. To satisfy this requirement, the Trustees published a public notice of the availability of the draft Plan in the Federal Register, The Manchester Union Leader, The Peterborough Transcript, The Keene Sentinel, and The Monadnock Ledger. The document was available for review at the Peterborough Town Library, and copies were obtainable from the U.S. Fish and Wildlife Service.

The Trustees conducted a public information meeting on May 16, 2000 and participated in a public hearing conducted by the Town on May 30, 2000. A summary of questions and comments received at the meetings and the Trustees' responses is provided in Section D.3. In addition, written comments from the public are reproduced in their entirety in the Appendix.

A copy of the final Plan will be available at the Peterborough Town Library:

Peterborough Town Library
2 Concord Street
Peterborough, New Hampshire 03458
(603) 924-8040

Copies of the final Plan may also be obtained at the following address:

U.S. Fish and Wildlife Service
22 Bridge Street, Unit 1
Concord, New Hampshire 03301
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D. Proposed Restoration

The Trustees' primary goal is to implement a restoration project that compensates for impacts to wetlands that provide habitat for migratory birds. The concept of restoration in this context may include returning a resource to its prior condition, rehabilitating or replacing a resource, and acquiring other resources to compensate for those which were lost.

1. Specific Restoration Projects Considered

The Trustees must consider a "reasonable number" of possible restoration alternatives (43 CFR, Section 11.81, DOI Natural Resource Damage Assessment Regulations). In our initial review, we identified the following as desirable characteristics for potential projects: the restored habitat should be similar in type to the habitat that was adversely affected; the project should be in the same watershed as the impacted wetland; and the project should provide long-term or perpetual benefits to fish and wildlife resources. Based on these characteristics, and on National Environmental Policy Act guidance, we identified the following specific potential projects:

a. No Action Alternative

Federal regulations require the consideration of this option. Under the No Action Alternative, no restoration, rehabilitation, replacement, or acquisition actions would occur to compensate for resources injured due to contamination from the Site.

b. On-Site Wetland Restoration

Removing low-level residual contamination from the on-site wetland was considered; however, this alternative is moot because environmental monitoring completed in 1998 indicated that clean up efforts and natural attenuation had left concentrations of contaminants below levels of concern.

c. Wetland Restoration in the Vicinity of the Site

Wetland restoration projects were sought throughout the Town of Peterborough and in the nearby vicinity. A survey of the Contoocook River in Peterborough did not identify any potential riverside restoration projects. Several degraded wetlands with the potential for restoration were identified by members of the Peterborough Conservation Commission, and are listed below:

Scrub Shrub Wetland Restoration

Fill, consisting of soil, debris, and asphalt, occupies several acres of former wetland in a 22-acre parcel in the north-central portion of Peterborough. The parcel is bordered by an inoperative landfill on one side and the Contoocook River on two sides. Groundwater contamination from the former landfill has spread beneath the property and is currently being monitored per requirements of the NH Department of Environmental Services. The potential for continued impact from the landfill adjacent to the property makes it undesirable for restoration. Therefore, this property will not be considered further.

Emergent Marsh Wetland Restoration and Clean Up

A one-acre parcel of primarily upland habitat surrounded by scrub/shrub and forested wetlands is available in northern Peterborough. The property, including a two-story dwelling, was recently taken by the Town “in lieu of” delinquent taxes. Refuse, including junked cars, tires, appliances, construction materials, and garbage has been dumped on the property. Some debris extends into the adjacent wetland. In addition, portions of the adjacent wetland have been filled. The goal of this potential restoration project would be to remove debris and potentially contaminated material from the upland portion of the property and to remove debris and fill from the wetlands. The upland habitat would be revegetated.

Wet Meadow Wetland Restoration

South of Peterborough center, at the northwest corner of the intersection of Route 101 and Elm Street there is a small, isolated, headwater wetland consisting of wet meadow interspersed and fringed with shrubs. The 1.6-acre wetland is located on a 3-acre parcel that was recently acquired by the Harris Center, a local non-profit conservation organization. In the eastern portion of the property, nearly 1/3 of an acre of wetland has been filled. The goal of this potential restoration project would be to remove the fill and restore the pre-existing wet meadow.

d. Acquisition of Equivalent Resources

Acquisition of equivalent resources entails the purchase and protection in perpetuity of wetland or upland habitats that provide resources similar to those injured by the contamination. Potential protection areas include those lands which provide habitat for endangered, threatened or rare species, migratory birds or other important natural resources. Upland areas that may be threatened by development, and that help maintain the integrity of existing aquatic areas will be considered a priority.

While acquisition of equivalent resources is often the least-preferred alternative because it results in preservation of existing resource values rather than replacement of lost resource values, in areas with imminent threats of development, protection can

be a good mechanism to secure and promote wetland viability by decreasing future direct and indirect impacts to wetlands. Three potential acquisition actions are described below:

Contoocook River Wetlands/Upland (Messina Property)

Subdivision plans for dividing a 202-acre parcel in the northern section of Peterborough into 47 house lots have been approved by the Conservation Commission and Planning Board. The parcel is comprised of upland and wetland. The forested upland habitat slopes gently toward the Contoocook River which forms the property's western boundary. Approximately 36 acres of floodplain, emergent marsh, and scrub/shrub swamp occupy the lowlands of the property. Numerous vernal pools throughout the forested lowlands provide extensive habitat for amphibians and reptiles.

As a condition of the Town of Peterborough's approval of the subdivision, the wetland portions of the site will be protected in a conservation easement. On the upland portion of the property, the subdivision is planned in five phases. While house lots are planned for uplands, direct wetland impacts will result from the construction of an access road through wetlands during Phase 4 and Phase 5. Secondary wetland impacts will likely occur due to increased disturbance in the upland and from runoff of lawn chemicals, oil, gasoline and grease from automobiles and paved surfaces, salt from road deicing, etc.

Under this alternative, the Trustees and the Town would jointly purchase approximately 40 acres of upland habitat (including 7 house lots in Phase 5 of the proposed subdivision and 5 house lots in Phase 4 of the proposed subdivision). The surrounding 36 acres of wetlands and floodplains that are part of the developer's required conservation easement would be combined with the protected upland to form a 76-acre conservation area managed by the Town Conservation Commission. Preventing development of these 12 house lots would eliminate the need for constructing a new road through an existing wetland. In addition, protection would prevent increased disturbance to the adjacent Contoocook River, on-site wetlands, and the numerous vernal pools on the property. Protection would help to minimize erosion, physical disturbance, contaminant runoff, septic leachate, and other threats to the river and associated wetlands.

Emergent Marsh and Surrounding Uplands Protection

A 76-acre parcel in northern Peterborough is available for protection. To promote development of an office park, the Town voted to re-zone approximately 25 acres of the site from residential to commercial. Upland portions of the site surround an open-water pond and emergent wetlands. From the dammed northeastern outlet of the pond, a small creek runs 1/4 mile under Route 202 to the Contoocook River. Protection of this parcel, which is situated near the Contoocook River and an existing

network of conservation land, would significantly increase the overall acreage of protected habitat in the area and provide extensive habitat for a number of wildlife species.

Hayfield Protection

A six-acre upland farm field that is located approximately 250 feet from the Contoocook River is available for protection. The field is flanked by roads on two sides, developed land on one side, and lightly developed/forested land on the remaining side. Although this parcel is not under imminent threat, it is suitable for development with town water provided and little site preparation required. Protection of upland open space would benefit a number of wildlife species that utilize open areas. A variety of grassland birds, including bobolink, eastern meadowlark, and savannah sparrow may benefit from protection.

2. Evaluation and Comparison of Projects

The Trustees are required to evaluate each of the possible restoration projects based on all relevant considerations, including the following factors: technical feasibility; the relationship of the expected costs of the proposed actions to the expected benefits; cost-effectiveness; the results of any actual or planned response actions; the potential for additional injury resulting from the proposed actions, including long-term and indirect impacts; the natural recovery period of the injured resources; the ability of the resources to recover with or without alternative actions; the potential effects of the action on human health and safety; consistency with relevant Federal, State, and tribal policies; and compliance with applicable Federal, State, and tribal laws. The following is our evaluation of the specific projects described above:

a. No Action Alternative

Under the no action alternative, injuries to migratory birds and their habitats would be uncompensated. Given sufficient time, natural processes should enable impaired wetland habitats adjacent to the New Hampshire Ball Bearings manufacturing facility to recover to pre-injury levels. However, the increment of resources and associated services lost to the public in the past and during the recovery period would not be compensated. Further, no benefits would be realized from the settlement with New Hampshire Ball Bearings and the obligations of the Consent Decree would not be met.

b. On-Site Wetland Restoration

As discussed in Section D.1.b, this option is considered unnecessary and it is not evaluated further.

c. Wetland Restoration in the Vicinity of the Site

Two potential wetland restoration projects were located in the vicinity of the Site: the Emergent Marsh Wetland Restoration and Clean Up and the Wet Meadow Wetland Restoration.

Emergent Marsh Wetland Restoration and Clean Up

The emergent marsh wetland restoration and clean up project would result in less than one-half acre of wetland habitat restoration. Benefits to the surrounding wetlands are also expected to be limited. The current action by the Town to take possession of the property and the continued habitation by the owner may also limit restoration activities or cause significant delay. The parcel's location adjacent to a state highway may lead to future road-related contamination of the restored area. Similarly, road construction activities associated with the adjacent highway could also negatively impact the parcel, or conversely, provide an alternate mechanism for clean up.

While this alternative would restore wetland habitat, some of which is similar to that which was adversely affected by the New Hampshire Ball Bearings manufacturing facility, the amount of habitat is less than the wetland restoration goal of one acre established in the natural resource damages settlement. The habitat is partially degraded due to its proximity to the road and future degradation is likely. The controversial ownership of the parcel also limits restoration activities in the near future. For these reasons, this project is not preferred.

Wet Meadow Wetland Restoration

This alternative would restore approximately 0.3 acre of wet meadow. This amount of habitat is less than our preferred wetland restoration goal of one acre. While restoration of this site would also benefit the adjacent 1.5 acres of wet meadow and enhance wildlife habitat in the 3-acre parcel, the overall benefit to the surrounding watershed would be limited. Moreover, since the parcel is surrounded by roadways and development, it is fairly isolated from more extensive habitat. Lastly, there may be other sources of funds available to undertake restoration of this site. For these reasons, this project is not our preferred alternative.

d. Acquisition of Equivalent Resources

Three parcels with the potential for development and that provide important wildlife habitat were identified in Peterborough.

Contoocook River Wetland/Upland (Messina Property)

This project would result in the permanent protection of 76 acres, including 36 acres of wetlands. Floodplain forest, emergent, scrub/shrub and open water types would be protected, in addition to numerous vernal pools. These relatively unspoiled and

extensive wetlands provide habitat for numerous species. While this project would not increase the total quantity or quality of existing wetlands, it would prevent the imminent destruction of 0.25 acre of wetland that would result from road construction and the degradation of 36 acres of wetlands that would result from erosion, physical disturbance, septic leachate, contaminant runoff, and other threats associated with adjacent upland development. Furthermore, protection of this property will augment an existing corridor of protected lands along the Contoocook River, contributing to the long term health of the watershed.

The completion of this project would depend on the Trustees' ability (in cooperation with the Conservation Commission) to raise significant additional funds. Should a cooperative effort to protect the parcel succeed, it would result in additional social, educational and environmental benefits. The Town would protect the property with a perpetual conservation easement, deed restriction, or other legally binding mechanism. The Town would enforce the easement and manage the property as a nature preserve.

Protection of the Messina property would not result in any additional injuries to ecological resources; to the contrary, it would ensure protection of those resources at the property, and compensate for injuries at the South Municipal Wellfield Superfund Site. The project would have no adverse impacts on human health or safety, and is consistent with relevant Federal and State policies. In implementing the project, the Town will ensure compliance with applicable Federal, State, and local regulations. This action does not entail the acquisition of land for Federal management as the property will be owned and managed by the Town.

Emergent Marsh and Surrounding Uplands Protection

This project would result in the permanent protection of 76 acres of habitat, including approximately 51 acres of wetlands. Development of the upland portion of the site would threaten the quality of adjacent wetlands. While the zoning of the parcel has been changed to promote office park development, currently there are no pending development plans for the site. Protection of this property is currently of lower priority than protection of the Messina property.

Hayfield Protection

This project would result in the permanent protection of six acres of open field habitat. Protection of this habitat (which is limited in the State of New Hampshire) and implementation of a grassland management program would benefit a variety of grassland species. However, benefits to wetland-dependent wildlife would be minimal. Additionally, the parcel is somewhat isolated from other wildlife habitat by existing roads and development.

3. Comments Regarding the Restoration Plan

Oral comments were received during the information meeting held by the U.S. Fish and Wildlife Service and during the public hearing held by the Town. Comments specific to the restoration plan are summarized below. The full transcripts from both meetings are attached in Appendix A. Written comments are also summarized below and attached in entirety in Appendix A.

a. Information Meeting - May 16, 2000

Comment: Several people questioned the nature of the restoration funds, whether they were for clean up, mitigation, or a fine.

Response: The Trustees reiterated that the funds are not for clean up, mitigation or a fine, but rather that they are intended to replace natural resources lost as a result of injury to wetland-dependent wildlife.

Comment: One person asked if there was any legislation to protect abutters to the Superfund Site and another asked if the money could be used on the same acre that had been contaminated.

Response: While there is no specific legislation regarding abutters and the expenditure of natural resource damages, the Trustees preference is to conduct restoration projects on-Site, or as near the Site as possible. Since on-Site restoration is unnecessary at this Site (Section D.1.b), we considered a number of projects within the Town of Peterborough.

Comment: Two people voiced support for the proposed project. One of these suggested that a property on Old Dublin Road be considered for acquisition if the proposed project is not conducted.

Response: The Trustees noted support for the preferred alternative. The Old Dublin Road property is an 11-acre parcel at the intersection of Old Dublin Road and Route 101. The property consists primarily of open and forested upland, sloping to forested wetland to the rear. Zoned for residential development and with limited access this lot would likely support one residence. The Trustees believe that the Old Dublin Road property is of less significance to wildlife and under less threat from development than the preferred alternative. Therefore this option is not preferred.

Comment: One of the Selectmen stated that he had concerns because the Board had not been advised earlier. He asked for a chance to consider other sites and asked if the comment period could be extended. He proposed a public hearing for May 30, 2000.

Response: The Trustees agreed to consider additional sites and extended the comment period from June 1, 2000 to July 1, 2000.

b. Public Hearing - May 30, 2000

Comment: The Board of Selectmen asked if the restoration funds could be used to protect land surrounding the Town's south well (Wheeler property).

Response: In view of the fact that the south well property was not included in the draft alternatives analysis, the Trustees were unable to comment on whether or not it was a suitable restoration site at the public hearing. However, on June 15, 2000, the Trustees, members of the Conservation Commission, and two Selectmen visited the south well property. The 1.5-acre property is comprised of a residential dwelling and lawn with a narrow forested upland region towards the rear of the parcel. The parcel would not be suitable compensation for the wetlands adversely affected by the New Hampshire Ball Bearings facility. Protection of the property, which is already developed would do little to increase wetland habitat values.

Comment: The Board of Selectmen also expressed support for the scrub shrub wetland restoration and clean up alternative (Section 2.D.c.).

Response: The Trustees explained that this alternative was not preferred because it would restore less habitat than the one-acre goal established in the natural resource damages settlement. Furthermore, the habitat's proximity to the road may result in future degradation of the area from road-related contamination or road construction activities. For these and other reasons described in Section 2.D.c., this alternative is not preferred.

Comment: The Selectmen asked who the funds belong to and who determines how they will be spent.

Response: The funds belong to the Department of the Interior. They were received from New Hampshire Ball Bearings to satisfy DOI's natural resource damages claim for migratory birds and their habitats injured by contaminants released from the Site. The Department of the Interior designated the U.S. Fish and Wildlife Service's Regional Director as the official responsible for assuring that funds received as a result of the claim are used to replace migratory bird resources injured at the Site.

Comment: The Selectmen expressed concern that the total funds needed to purchase the preferred alternative are not known. Moreover, the Selectmen are concerned that the amount needed will be greater than the settlement money available for restoration.

Response: While the Trustees do not currently know the purchase price of the preferred alternative, an appraisal will be conducted that will determine what the Trustees can spend for purchase of the property. Additional funds that may be needed to purchase the property will be raised through private donations and grants, not through a Town budget process.

Comment: The Selectmen asked that the Trustees meet with the Conservation Commission and members of the Selectboard to review other potential lands for protection.

Response: On June 15, 2000, the Trustees, members of the Conservation Commission, and two Selectmen visited four properties identified by the Town: the south well property, the Graves property, the Route 101 wetland property, and the Hall property. As previously discussed, the south well property was not an appropriate alternative due to its limited value for wildlife.

The Graves property is a 10.65-acre parcel that abuts the Contoocook River and is located along Route 202, approximately 2 miles south of Peterborough. Comprised of upland forest and floodplain forest that borders the Contoocook River for nearly 1/4 of a mile, this property provides habitat to wildlife utilizing the Contoocook River. However, surrounding industrial land use, including an active sand and gravel pit and manufacturing facilities, have degraded the overall wildlife value of the area. The Graves property is zoned for industrial development; however, the narrow shape of the parcel, sandwiched between the road and the river, limits opportunities for development. While the property is currently for sale, there are no current development plans in place. The Trustees believe that the Graves property is of less significance to wildlife and under less threat from development than the preferred alternative. Therefore this option is not preferred.

The Route 101 wetland is 1½ acres of predominantly palustrine emergent and scrub shrub wetland. There is very limited development potential due to the predominance of wetlands; therefore this property is not preferred for protection.

The Hall property is discussed below, in our response to written comments from Lawrence Ross, chairman of the Board of Selectmen.

c. Written Comments

Comment: William B. Perkins, Attorney, Loring, Wolcott and Coolidge Office
Mr. Perkins requested that marshland adjacent to the New Hampshire Ball Bearings facility be considered for acquisition as a wildlife preserve (Arria Morison Trust property). A parcel of approximately 10 acres, including marsh and upland property, was recommended. Mr. Perkins believes that this property has advantages over other

sites in the Plan because of its proximity to the impacted area.

Response: The Trustees conducted a site visit to the property on June 15, 2000. This property provides high quality wildlife habitat and is comprised of roughly six acres of open water and emergent marsh wetlands bordered by four acres of mature hardwood forest. The wetlands are similar to those that were adversely affected by contamination from the Site. However, the upland area adjacent to the wetlands is under very little threat from development because of its inaccessibility. Therefore, protection of this parcel would not prevent degradation of wetlands, an important factor when acquisition, rather than restoration of wetlands is being considered. For this reason, this recommendation is not the preferred alternative.

Comment: Lawrence C. Ross, Chairman, Board of Selectmen
Representing the Peterborough Board of Selectmen, Mr. Ross requested that the Hall property be given priority consideration. He believes that "The Hall property is in more immediate danger of residential development than the Messina parcel being considered." Furthermore, the Hall property is a "parcel with major open space values...includes a major wetlands complex, [and] appears to provide significant natural habitat for wildlife..." In closing, Mr. Ross states that "The Board recognizes that both parcels should be protected..."

Response: The Trustees recognize the Board's preference for the Hall property. As noted by Mr. Ross, the Hall property is a large parcel (120 acres) that provides significant wildlife habitat and open space. It is located approximately one mile west of downtown Peterborough, on Route 101. The diversity of wetland types, including seepage marshes, emergent marshes, and forested wetlands (both hardwood and softwood), and adjacent upland forest, provides habitat for numerous wildlife species. A rare plant, the small crested sedge (*Carex cristatella*) was located on the property by representatives from the New Hampshire Natural Heritage Inventory Program. While the wildlife value of the property is great, the Trustees consider the threat of potential development to be less well defined and less immediate than the threat to the preferred alternative. As stated by Mr. Ross, the owner of the Hall property intends to wait until March, 2001 to develop his land if it is not first protected by the Town. Before Mr. Hall's property is developed, a development plan will need to be created and approved by the Town conservation commission and planning board. Depending on potential wetland impacts, Mr. Hall may need additional permits or may need to redesign the plan. Since Route 101 is a limited access highway, the number of driveways or roads will be limited. Lacking access to town sewerage may confine the development to portions of the property with adequate percolation. Because the development of this parcel has not begun in earnest, the Trustees do not have sufficient information to judge how large an area will be developed and how many potential lots will be constructed, nor do we accurately know when development would begin. Impacts to nearby wetlands are

difficult to determine. Due to the layout of habitat on the site, with wetlands to the north and the most suitable developable land limited to the southeast portion of the property, impacts to much of the wetland may be minimized.

Comment: Dave Stephenson, Stephenson Timber Frames

Speaking as a former Chairman of the Peterborough Conservation Commission, Mr. Stephenson expressed his overwhelming support for the preferred alternative. In his letter, Mr. Stephenson described the Commission's efforts to protect the Contoocook River, nominating the river under the Rivers Management and Protection Act, purchasing conservation land and facilitating the donation of easements for several parcels, including over 1,000 acres of contiguous land, and working with developers to minimize impacts along the river. The Messina land has been sought for protection for at least 15 years. The tract supports numerous wildlife species including moose, bear, bobcat, fisher, and several species of owls and it flanks the river which serves as a corridor for migratory birds from ospreys to warblers.

Response: The Trustees note Mr. Stephenson's support for the preferred alternative and the efforts of local conservationists to protect the important wildlife habitat along the Contoocook River corridor.

Comment: Francie Von Mertens, Chair, Peterborough Conservation Commission

Ms. Von Mertens provided two memoranda, one to the U.S. Fish and Wildlife Service and the other to the Board of Selectmen. In the memoranda, Ms. Von Mertens stated that the decision on how to spend the funds should be based on wildlife criteria and that the "Commission feels obligated to leave the decision to USFWS." In her memorandum to the U.S. Fish and Wildlife Service, Ms. Von Mertens suggested that the threat to the Hall property is not known, whereas "The threat is known at the Messina property: 12 house lots along the Contoocook River, a major north/south flyway, and an area where local conservation groups have a good record of land protection. Reaching the 12 house lots also would involve a bridge spanning wetlands and [a] perennial stream." In her memorandum to the Board of Selectmen, Ms. Von Mertens agreed "that maintaining the Hall property on Route 101 as undeveloped open space is of strategic importance to the town for reasons of flood protection, maintaining a green corridor along Route 101....and the potential for trails to link children to nature." Commission members agreed that the challenge is to secure both properties as open space for the town.

Response: The Trustees acknowledge the position of the Conservation Commission with regard to determining the preferred alternative on the basis of wildlife value. In addition, the Trustees agree with the Commission's assessment that the nature of the threat at the Hall property is not as well known as the threat at the Messina property.

4. Proposed Action

As stated previously, acquisition of equivalent resources is often the least-preferred alternative because it results in preservation of existing resource values rather than replacement of lost resource values. However, in areas with limited restoration possibilities, protection can be a good mechanism to secure and promote natural resource viability by decreasing future direct and indirect impacts. Based on an evaluation of the potential benefits and impacts of the various restoration alternatives, acquisition of equivalent resources is preferred in this case.

In addition to the three habitat protection alternatives described in the Draft Plan, six additional properties were subsequently identified by the public, and are addressed in the responses to comments (Section D.3., Comments Regarding the Restoration Plan): the Old Dublin Road property, the south well property, the Arria Morison Trust property, the Graves property, the Route 101 wetland, and the Hall property. Except for the Hall property, none of these were identified as preferred alternatives due to their limited wildlife value or limited threat from development. Due to its significant wildlife value, the Hall property was thoroughly evaluated and it is compared to the preferred alternative, below.

Specifically, we compared the Hall and Messina properties using three primary criteria: 1) the wildlife value of the property and the conservation status of adjacent lands, 2) the nature of the threat to wetland habitat and 3) the imminence of the threat. The Trustees surveyed both properties on at least three different occasions and received input from numerous parties, including members of the Conservation Commission, and biologists from the U.S. Fish and Wildlife Service, New Hampshire Fish and Game, New Hampshire Natural Heritage Inventory Program, and New Hampshire Department of Environmental Services.

Both properties have significant wildlife habitat, with a diversity of wetland and upland types. A series of eight vernal pools in the floodplain of the Messina property are particularly noteworthy. The rare small crested sedge was located at both sites. The Messina property borders the Contoocook River (a state-designated river) for approximately 2/3 of a mile, and thus comprises an important link in the wildlife corridor which follows the river. Furthermore, the Messina property is in close proximity to over 1,000 acres of conservation land, and it abuts protected land that spans over a mile of river frontage. Conservation of the Messina tract enlarges an already significant conservation area, while preventing degradation of protected lands that might result from a subdivision in their midst. In contrast, the Hall property is relatively isolated from other conservation lands.

As previously discussed, the degree of threat is less known at the Hall property compared to the Messina property. Moreover, development of the Hall property will be limited by road access, steep slopes, wetland soils, and septic requirements. Without development plans it is difficult to accurately assess future impacts to adjacent wetlands. However, based on the layout of the parcel, much of the wetland acreage appears to be situated away from the prime development area. At the Messina property the threat is known. Twelve house lots will be

built on an upland surrounded on three sides by wetland. In addition, a road and bridge will be constructed across an existing wetland and a perennial stream.

The imminence of the threat differs at the two sites. Development of the Hall property will not be considered until March 2001. At that time, permits and plans will need to be approved before any construction activities begin. Development of the Messina property has begun; plans have been approved, permits have been attained, and road construction is ongoing. The fifth phase of the project (which incorporates the land considered in the preferred alternative) is not scheduled to begin for three years. However, the developer plans to begin road and bridge construction for the fifth phase and to excavate sand and gravel from the area this autumn.

Due to its high wildlife value, its proximity to conservation lands, and the degree and imminence of development threat, protection of the Messina property is the preferred alternative. Protection of this property maximizes the benefit to wetland-dependent wildlife, preventing the imminent destruction and degradation of an extensive wetland system. For all of these reasons, we believe that protection of the Messina property best compensates for services lost to the environment and to the public from the South Municipal Wellfield Superfund Site.

Should sufficient resources to purchase the Messina property not be raised, the Hall property or other similar protection initiatives will be considered.

E. Compliance with the National Environmental Policy Act (NEPA)

The *Final Revised Procedures* for the U.S. Fish and Wildlife Service for implementing NEPA, published in the *Federal Register* on January 16, 1997, provide a categorical exclusion for natural resource damage assessment restoration plans prepared under CERCLA when only minor or negligible change in the use of the affected areas is planned. Categorical exclusions are classes of actions which do not individually or cumulatively have a significant effect on the human environment.

The proposed project will result in little or no change in the use of the affected area. Accordingly, this Restoration Plan is a categorical exclusion under NEPA. We have prepared an Environmental Action Statement documenting this determination.

F. List of Agencies, Organizations, and Parties Consulted for Information

Alan Ammann, USDA, Natural Resource Conservation Service
Mark Barash, Office of the Solicitor, Department of the Interior
Carl Baxter, N.H. Department of Environmental Services
Doug Bechtel, N.H. Natural Heritage Inventory Program
Richard Cook, Audubon Society of New Hampshire
Doug Cygan, N.H. Department of Transportation
Roger Duwart, U.S. Environmental Protection Agency
William Ingham, N.H. Fish and Game Department
Bob Miller, The Nature Conservancy
Ken Munney, U.S. Fish and Wildlife Service
Edward Robinson, N.H. Fish and Game Department
Peter Ryner, Peterborough Community Development Director
Bob Scheirer, U.S. Fish and Wildlife Service
Dan Sperduto, N.H. Natural Heritage Inventory Program
Ken Sprankle, N.H. Fish and Game Department
Francie Von Mertens, Peterborough Conservation Commission
Peter Walker, N.H. Department of Environmental Services, Wetlands Board

Appendix A. Meeting Transcripts and Written Comments

Selectmen's Meeting
May 16, 2000

Present: Lawrence C. Ross
Roland A. Patten

Pamela L. Brenner

Selectman Chairman Lawrence Ross called the meeting to order at 7:00 p.m.

Selectmen Ross quoted a statement in the newspaper by Conservation Chairman Frances Von Mertens.

"It would be nice to go to this meeting on Tuesday with an open mind."

INFORMATIONAL MEETING

U.S. Fish and Wildlife Department

Frances Von Mertens introduced Molly Sperduto of N.H. Fish and Wildlife who was here to present the results of her work at the South Well superfund site.

She noted that the U.S. Fish and Wildlife service is not a clean up agency but are involved to work with assessing the impact of pollution and its effects on the wildlife. The impacted site that consists of one acre of wetland inhabited by migrating birds has been cleaned up. Also at this meeting Chris Rawnsley and Richard Reynells of New Hampshire Ball Bearing were there to help answer any questions relative to the clean up that the Ball Bearing Company had been involved with.

Selectman Ross asked if the New Hampshire Ball Bearing, Inc. paid over \$800,000 for this clean up, why does U. S. Fish and Wildlife receive \$94,000?

Molly Sperduto noted that these funds were the amount agreed to be paid by New Hampshire Ball Bearings to help establish a wetland to replace the wetland that may have been lost due to pollution.

Arria Morrison Weir expressed her concerns as to why her property which is adjacent has not been cleaned up?

The representatives from the Ball Bearing noted that they had followed the proposed mediation plans very carefully. This meeting was with regard to the replacement of wetlands lost and not the original clean up and that in fact her property had been cleaned up.

Molly Sperduto noted that she would like to talk about the funds received for the settlement.

David Weir asked if the funds assessed are to pay for mitigation?

Selectmen's Meeting
May 16, 2000

Ms. Sperduto noted that she would not call it mitigation, but instead to actually replace the natural resource. This is a separate item from clean up costs.

Selectman Patten asked if the funds were to be considered a fine?

Molly Sperduto noted that this is to help the restoration of the damaged acre of wetlands.

At this point Ms. Sperduto reviewed the plan in detail utilizing a slide presentation.

The slides depicted the process of restoring an acre back to an undamaged state.

The amount has been determined to be \$94,000 to restore the wetland. She reviewed the steps for going through the process. . She has worked with several agencies on this project.

There are several alternative action items she outlined as below:

1. No Action
2. On site wetland restoration
3. Off site wetland restoration by acquiring another area.

The on site wetland restoration has been determined to be too costly.

The off site areas within Peterborough was the property North of the Town's former dump on Hancock Road, the Kingery property also on Hancock Road, property on Elm Street and Dublin Road, property on Hancock Road and Scott Mitchell Road or the former Lussier property on Hancock Road.

The recommendation of the N.H. Fish and Wildlife Service is the Messina property off of Burke Road. The property has approximately 40 acres with vernal pools. The proposal for this property would be to protect a portion of the land as a wetland for natural habitat for birds and amphibians.

The chief benefits would be to eliminate disturbances caused by development, such as a bridge being built, house lots and motor oils.

Ms. Sperduto stated that the public comment period closes on June 1, 2000.

Selectman Ross asked how the funds are implemented?

The response was that it would depend on the type of project whether it was restoration or another type.

Selectmen's Meeting
May 16, 2000

David Weir representing the Morison family asked if there was any legislation to protect abutting property owners?

Ms. Sperduto said that it is the preference to do a project such as this as close to the damaged site as possible. She noted that her focus is to maintain the same number of wetlands as before and she encouraged Mr. Weir to contact her for further questions regarding his own property.

Bruce Webb asked if the \$94,000 could be used on the same acre that had been contaminated?

Ms. Sperduto noted that the funds had been contributed by New Hampshire Ball Bearings and that the site has already been restored by the Ball Bearing clean up operation.

Selectman Ross and the Town Administrator, Pamela Brenner discussed the procedures that the Town would have to follow to acquire additional real estate.

If the Town were to buy this land it would need a town meeting vote, the Conservation Commission would have other options to purchase the land.

Mary Monahan voiced her support of this project and also stated that she is aware of another property on Dublin Road that is available.

Richard Pendleton stated that in looking at the different options the final suggestion made by New Hampshire Fish and Wildlife makes the most sense.

Selectman Ross asked what would be the cost to acquire the property?

Frances Von Mertens of the ConCom noted that she was not comfortable talking about the figures as she did have them with her.

Selectman Ross stated that he had concerns regarding that this project as the Board had not been advised earlier. He is concerned that a lot of people have not had a chance to think about these various sites. He would like to be able to have a chance to consider other sites and asked if there could be an extension of the June 1, deadline. He also proposed that a public hearing for Tuesday, May 30th. Ms. Sperduto stated that she would be willing to extend the deadline for another 30 days to July 1, 2000.

Selectman Ross closed the information session.

Public Hearing

World War I- Gun

Michael Sebor, representing the Civil War Re-enactors proposed to move the World War I gun from in front of the Civil War Memorial to a more appropriate location.

Selectmen's Meeting
May 30, 2000

Mr. Halle stated that there is a wooden box manufacturer located there.

The next step will be to review and discuss the possibility and to work out with the current owner and how to help the business to be relocated.

Brian McMaster noted the grant required for this study to be finished and closed by the end of June, there are still some funds left in the grant if further the Board needs further study.

Selectman Juengst asked who originated the study?

Selectman Ross noted that the Town originated the study.

David Stephenson asked why use this building?

Brian McMaster noted that the purpose of this study is to find if it would be feasible use for this building.

Being no more comment on the subject, The Public Hearing was closed.

DOI-Department of the Interior

The Board opened the public hearing being held as a result of the informational hearing for the US Fish and game in regard to a proposal of spending \$94,000 received from New Hampshire Ball Bearing to replace or create a wetland.

The Board would like to know whether or not the funds could be used for the reestablishment of the south wellhead.

Peter Ryner, The Community Development Director, noted that the area would require aerial photography the property would need to be reviewed by Molly Sperduto of US Fish and Wildlife. Ms. Sperduto noted that she has not reviewed the property yet; she also had a few other properties to look at. Mr. Ross also noted that the Town is also interested in the Kingery property.

Selectman Patten noted that he is very interested in the Wheeler property and also the Kingery property. There was discussion whether this would be the area for wetland mitigation for the DOT project. Ms. Sperduto noted that there is a higher value of habitat at the Messina property than would be at the Kingery property.

Selectman Ross asked who would make that decision. Ms. Sperduto stated that her office would make that decision.

Selectman Ed Juengst asked what is the process for this issue.

Selectmen's Meeting
May 30, 2000

Ms. Sperduto noted that U.S. fish and game would like a written statement from the Board. Selectman Ross noted that he has received a call from Senator Gregg's office who express concern about the ownership of the money.

Selectman Patten asked if the funds belong to the department of the interior or are the funds designated for the Town of Peterborough that can be spent elsewhere.

Frances Von Mertens of the Conservation Commission has been working with the U.S. Fish and wildlife service on this project and she stated that as a conservation commission issue is, the largest the block, the better. Fragmentation is not good.

Selectman Ross noted that he is concerned that the Town does not know what the total amount of funds needed to purchase this property. He know it would be considerably more than \$94,000.

Susy Manfield noted that all of these properties might need to be supplemented.

Selectman Juengst noted that he is interested to see how the process is moved along.

Molly Sperduto said that she will incorporate all the options and will follow up with the Board on this issue.

Selectman Patten asked if the Board needs to write a letter? Ms. Sperduto noted that the meeting input is sufficient for now.

Selectman Ross asked perhaps that a further meeting with Conservation Commission would be helpful. A member of the Board and the Conservation Commission would be willing to go to review.

Susy Mansfield noted that at the last public hearing was extended to July 1st.

Being not further input The Public Meeting was closed.

BID OPENING

The Board opened the bids received for the Police Computer.

Chief Guinard and Lt. McCall of the Police Department were present.

The Board opened the bids for the software. There was one bid received.

Information Mgmt Systems of Grafton, Ma.

\$31,500

The Chief recommended that the Board accept this bid.

LORING, WOLCOTT & COOLIDGE OFFICE

FIDUCIARY SERVICES

*230 CONGRESS STREET
BOSTON, MASSACHUSETTS 02110-2437*

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AMY L. DOMINI
WILLIAM B. PERKINS
HUGH L. WARREN
LINDSEY W. PARSONS
JUSTIN W. HEATTER*

*MICHAEL L. ASHE
ROBERT L. DRISCOLL, JR.
JOY L. LANGONE
SARAH E. McMANAWAY
JONATHAN L. KORB*

*BRADFORD M. ENDICOTT
SAMUEL H. WOLCOTT, JR.*

May 17, 2000

Molly B. Sperduto
Kenneth C. Carr
U.S. Fish and Wildlife Service
22 Bridge Street, Unit 1
Concord, NH 03301

Re: Draft Restoration Plan
South Municipal Wellfield Superfund Site

Dear Ms. Sperduto and Mr. Carr:

I am writing on behalf of the Arria Morison Trust which owns the marshland to the north of and directly adjacent to the New Hampshire Ball Bearings property. If the purpose of your restoration plan is the acquisition of equivalent resources to replace in perpetuity the resources that have been injured by the contamination on the New Hampshire Ball Bearing property, we would expect that our property should have been considered in this program. It is directly accessible to the impacted wildlife and is one of the few remaining buffers to the commercial development that has taken place in this area.

Since this property is of a different character to the rest of the land owned by the trust, the trustees would entertain a proposal for its acquisition as a preserve for wildlife in this area. I have enclosed a map of the parcel (identified as Parcel E) which contains roughly ten acres, including marsh and upland property. This is a portion of a lot identified as Map U-20 Lot 5A on the town of Peterborough tax maps. The property was the site of test wells during the EPA monitoring of the New Hampshire Ball Bearings clean up. The tests indicated no evidence of ground water contamination on this site.

RECEIVED

TO: CHIEF SERVICE

MAY 18 2000


FILED OF THE
RECORDS

LORING, WOLCOTT & COOLIDGE OFFICE

Molly B. Sperduto
Kenneth C. Carr
May 17, 2000
Page Two

We feel that the location of a site that is adjacent to the impacted area has obvious advantages over the other sites in your report. We request that you consider the site and suggest that this might be done in conjunction with one of your efforts at a more remote site. I would be happy to discuss this matter with you.

Sincerely,

A handwritten signature in dark ink, appearing to read 'William B. Perkins', with a long horizontal flourish extending to the right.

William B. Perkins

WBP/ad
cc: Richard Fernald
Fernald, Taft, Falby & Little

COPY-

To: The Peterborough Selectmen
From: The Conservation Commission
Re: Open Space priorities and the U.S. Fish & Wildlife Service (USFWS)/
Superfund settlement money

June 27, 2000

As requested by the selectmen, the Conservation Commission met to discuss the merits of the Hall property for purchase with USFWS/Superfund settlement money. As always when considering these funds, USFWS's mandated criteria of wildlife benefit were key to the discussion.

The commission strongly agrees with the selectmen that maintaining the Hall property on Route 101 as undeveloped open space is of strategic importance to the town for reasons of flood protection, maintaining a green corridor along Route 101 at the approach to town, and the potential for trails to link children to nature—reasons stated by the selectmen.

The benefits of preserving the Messina property were also discussed at the selectmen's June 23 meeting. Stretching over a half mile along the Contoocook River corridor, an additional stream shoreline and wetlands, this property has been a focus of the Conservation Commission for over 10 years. As all at the meeting agreed, the wisest course is not to select between the two in an either/or situation; the challenge is to work together to secure both properties as strategic open space for the town in a process that could be the first step towards establishing a land capital fund through the town budget process.

Commendably, the owner of the Hall property has approached the town to offer the property at a favorable price. The Conservation Commission welcomes partnering with the selectmen, Open Space Committee and Office of Community Development on such an open space project. The property owner's deadline of March appears well designed for the annual town vote. By that time the possibility of FEMA and other funds would be known as a match for town funds.

The Messina property does not appear to be as strongly suited for a town funding process. Typically town funding goes towards flood or drinking water protection or neighborhood trails—human-related values rather than wildlife-related. To have funds designated for wildlife is unusual, be they federal, state or town funds. As mentioned in the meeting, USFWS has offered to help secure additional wildlife funds to leverage purchase of the Messina property.

USFWS is in the process of ranking the Hall and Messina properties based on its mandated criteria of wildlife benefit. As you know, the process is a thorough one, weighing many factors. Respecting USFWS's role and expertise as legal trustees of wildlife, the Conservation Commission feels obligated to leave the decision to USFWS. That being said, we also believe that the best strategy for securing both properties would be USFWS funding for the Messina land, and a combination of town and other funding sources for the Hall land.

Whatever the decision, we look forward to working with the selectmen to guarantee that the Hall property is secured. At times the road has been bumpy as the USFWS/Superfund settlement money has been debated. The end result is very positive: several properties of strategic open space importance to the town have been identified, and steps taken towards a town process of partnership to secure those lands.

Respectfully,



To: U.S. Fish & Wildlife Service, Molly Sperduto
From: Peterborough Conservation Commission

June 29, 2000

Re: South Municipal Wellfield Superfund Site, Draft Restoration Plan

Enclosed is a memo from the Conservation Commission to the Peterborough Selectmen in response to their request that the commission join them in recommending the Hall property on Route 101 as #1 choice for the Superfund settlement money that USFWS is administering. Commission members were not comfortable joining in a lobbying effort, especially one that centered on non-wildlife issues. As stated in our letter, it is rare to have money designated for wildlife, and wildlife should remain the criteria. As also stated, who better to interpret those criteria than USFWS as legal trustees of wildlife.

The selectmen judge imminence of threat as greater for the Hall property. Conservation Commission members, in discussing threat, concluded that timing (imminence) is only one factor. The nature of the threat has importance as well. The threat is known at the Messina property: 12 house lots along the Contoocook River, a major north/south flyway, and an area where local conservation groups have a good record of land protection. The Messina half-mile of shoreline has high wildlife value. Reaching the 12 house lots also would involve a bridge spanning wetlands and perennial stream. The threat at the Hall property is not known, although "developers" have been mentioned as showing interest in it.

Strategically, eager to secure both properties, the commission believes that the town's selectmen and Office of Community Development, having strongly identified the values of the Hall property to the town (maintaining a rural look along Route 101 and floodplain protection), will follow through with acquisition steps if the settlement money is not dedicated to the Hall property. Peter Ryner has spoken to the town's Open Space Committee about launching a budgeting process for open space centered on strategic property. The Hall property is high on his list, and quite possibly the highest on that list given the existence of a willing seller and reasonable price.

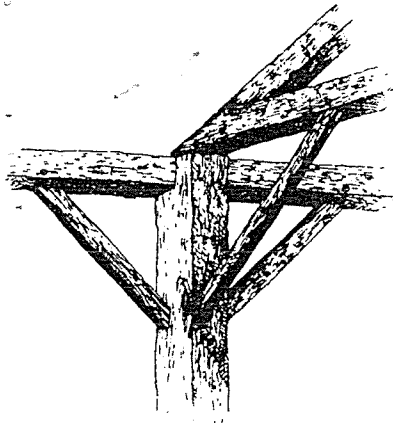
As stated in our letter, we believe the Messina property would not have success in launching a town budgeting process for open space. The Hall property would be an ideal "poster child" for such a process. The Messina project would not. The developer has a long history with the town that does not qualify for "poster child" status.

The settlement process has resulted in important, enlightened conversations at the Town House level about strategic open space in Peterborough—a very healthy turn of events. The Conservation Commission appreciates USFWS, and specifically Molly Sperduto, for launching those conversations.

Francie Von Mertens

Francie Von Mertens, Chair

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U.S. FISH & WILDLIFE SERVICE



STEPHENSON TIMBER FRAMES

P.O. Box 6
Peterborough, NH 03458
603 924-9071

RECEIVED
U.S. FISH AND WILDLIFE SERVICE
JUL - 1 2000
GREENFIELD OFFICE

6/29/00

Molly Sperduto
US Fish and Wildlife
22 Bridge St. Unit 1
Concord, NH.

03301

Dear Molly,

I was a member of the Peterborough Conservation Commission for over 13 years and Chairman for most of them. During that time, and even before, it was our stated policy to try to protect the northern part of the Contoocook River corridor in Peterborough. The Commission saw it as the most significant wild area in town and envisioned joining with neighboring towns to the north to protect a large contiguous natural area on both sides of the river as well as preserving the old B&M RR railbed along the west bank of the river for low impact recreational use.

To this end we worked for over two years to have the river nominated under the Rivers Management and Protection Act. We bought some lands along the river as well as two islands in it. We worked with landowners to put easements on parcels along the river and in some cases, donate the land to the town as permanent open space. With the Monadnock Conservancy, the Harris Center and NH Fish and Game we raised \$50,000 and bought an easement on the Dillon farm in Hancock thereby preserving 140 acres and over a mile of shoreline. While on the Planning Board, I worked to have the Ridgewood Heights development cluster its condos away from the river and preserve about 90 acres of open space. We have taken developers who wished to build in the flood plain, to a hearing at the Wetland Board where their requests were turned down. To date over 1000 acres of contiguous land has been protected in Peterborough, Hancock and Greenfield.

The land along the River in northern Peterborough remains a primary concern of the Commission. Aside from Messina, three landowners own all of the remaining unprotected land along the river for several miles. We are working gently and slowly with these landowners in conjunction with other conservation organizations, in hopes that this land too can be protected.

The Messina land has always been a most important part of this protection effort. I first walked the land some 15 years ago with Phil Dubois who was chairman of the Conservation Commission before me. We agreed on how unique the land was but didn't see how we could come up with the \$250,000.00 price. We also thought that it was unlikely any developer could ever get permission to cross the wetlands to develop the 36 acres where Messina now has 12 approved lots. Anyway Messina did come up with the money and I began corresponding with him at least 12 years ago trying to get him to understand the ecological importance of the land and to try to get him to preserve it, or sell it, or put an easement on it; anything to protect it. We would have too, if the neighbors had not convinced the Planning Board that allowing Messina to put in lots under three acres, the minimum size in the rural zone, would undermine their property values. Consequently, in order to get his full density, Messina was forced to cross the wetlands and put in 12 lots.

I'm sorry to be so longwinded but I thought you should know some of the history behind the Messina lot and the Contoocook River in general. The area now supports moose, bear, bobcats, fisher, barred owls, longeared owls, great horned owls and saw whet owls. The river serves as a corridor for migratory birds from ospreys to warblers and along its banks even the sound of traffic is gone.

I know you will make your decision as to which property best meets your criterion but I want you to know that many people over many years have judged the Messina property to be extremely important for just those wildlife habitat values and also as a link in a growing greenway along a remarkably wild river.

If you wish to discuss this further, or take a walk, or pore over maps please feel free to give me a call.

Sincerely

Dave Stephenson



TOWN OF
PETERBOROUGH
ADMINISTRATION

1 Grove Street
Peterborough, NH 03458
Office: (603) 924-8000
Fax: (603) 924-8001

June 29, 2000

Ms. Molly Sperduto
U.S. Fish and Wildlife Service
22 Bridge Street Unit 1
Concord, NH 03301

Dear Molly;

The Board of Selectmen appreciates the opportunity to comment on the several parcels being considered for protection utilizing the New Hampshire Ball bearing funds. We also appreciate your willingness to open up this process and feel that in doing so we now have an opportunity to consider an equally important piece of property that may have been overlooked. The Board has gained valuable insight into the overall need for more open space protection in Peterborough.

The Board recognizes the importance and value of the Messina property, and agrees that it should be protected. However, after reviewing the other parcels that are being considered, the board is unanimous in requesting that the Hall property be given priority consideration. The Board does not know if the Hall property meets all of the criteria that the Fish and Wildlife Service must consider, but clearly this is a parcel with major open space values. From what we have learned and observed this parcel includes a major wetlands complex, appears to provide significant natural habitat for wildlife and contains upland that will be developed in the immediate future if not protected.

The Board feels strongly that timing is an important consideration. The Hall property is in more immediate danger of residential development than the Messina parcel being considered. Mr. Hall has rejected various development proposals, waiting to see if the Town is interested in protecting the land. But he has indicated that he cannot wait beyond next March. The Messina parcel is also scheduled for development, but not for at least three years.

The Board recognizes that both parcels should be protected, and appreciates the hard work that you and the Conservation Commission have given to establishing the importance of the Messina property. While we urge that you give the Hall property priority, we would also appreciate any technical and financial assistance that you can provide the Town to assure that both parcels receive long-range protection.

Thank you for your consideration in this matter.


Sincerely,

Lawrence C. Ross
Chairman

cc: Matt Leahy

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NEW HAMPSHIRE

ENVIRONMENTAL ACTION STATEMENT



J. Mitch King Date 9/26/00
Regional Director