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May 30, 2025

City of Keene – Planning Board
Community Development Department
3 Washington Street
Keene, NH 03431
Attn: Megan Fortson, Planner
Evan Clements, Planner
Mari Brunner, Senior Planner

RE: G2 Holdings LLC - Excavation Permit Package Review
Tax Map 215 Lots 7 & 8 – 57 Route 9 – Keene, NH

Dear Board Members,

As requested, Fieldstone Land Consultants, PLLC (Fieldstone) has performed a review of the documents submitted for the above referenced project. The following documents were submitted for our review:

- Response and Transmittal Letter prepared by Granite Engineering LLC, dated May 8, 2025
- Waiver Requests for Article 25.3.3 and Article 25.3.6, no date
- Surface Water Resource Setback Plan, dated May 9, 2025
- Stormwater Management Report, dated May 8, 2025
- Acid Mine Drainage Detection Initial Response Action Plan, dated April 6, 2025
- Stormwater Pollution Prevention Plan (SWPPP) for the current pit operations, dated January 31, 2023
- Revised Plan Set, last revised May 9, 2025

Fieldstone has completed a review of the materials provided against the City Land Development Code. More specifically the submission materials have been reviewed under Article 25 – Earth Excavation Regulations and Article 26 Section 26.19.4 which handles the Earth Excavation Permit.

The following comments are from our February 14, 2025 review. Granite Engineering's responses to our comments are represented in bold text and our current comments are in italicized text, as needed.

Section 25 Earth Excavation Permit:

1. Section 25.2B: This project will require state and federal permits and these permits have not been obtained yet. Fieldstone would recommend that these permits be considered as conditions of approval when and if the project reaches that point.

No response required.

It is our understanding that the state and federal permits for this project are still pending and as such Fieldstone still recommends that these be considered as conditions of approval should the Board move in that direction.

2. Section 25.2C: The reports prepared and submitted indicate that this project has the potential to cause adverse impacts associated with the excavation project operations. This section outlines hazards as noise, traffic, dust or fumes, visual impacts, degradation of roadways, erosion and soil instability, sedimentation, adverse impacts to surface and ground waters, loss or fragmentation of important habitat, air quality degradation, pollution of soils or diminution of the value of abutter properties. Based on the materials provided it appears that this project will result in adverse impacts to surface and groundwaters. This is clearly outlined in the Acid Mine Drainage Potential Report and we believe the stormwater management report does not currently adequately address the surface water conditions either.

Although the site's bedrock may exhibit potential acid-generating properties, this characteristic alone does not inherently make it so. Professionally engineered plans, a Hydrogeologic Investigation Report, Acid Mine Drainage Potential Report, and an Acid Mine Drainage Detection Initial Response Action Plan prepared by a professional geologist are included in this submission. As demonstrated in the submitted material, excavation activities will not adversely impact surface or ground water quality through the unearthing of toxic or acid-forming elements or compounds resident in the bedrock or soils.

Given that bedrock was encountered and has the potential to contain minerals that could lead to AMD, a waiver is required to proceed with bedrock excavation. This waiver is necessary to excavate the material on-site adequately. While AMD is uncommon in active New England quarries, our proactive approach includes initial testing, early detection protocols, and action plans, which are crucial for managing any potential adverse effects. These supporting documents have been included with this submittal.

All stormwater from bedrock excavation activities will be collected, contained, and infiltrated back into the ground. We anticipate zero runoff associated with the bedrock excavated areas discharging the site, effectively protecting surface waters from potential AMD. The revised Stormwater Management Report includes an analysis of the two proposed infiltration basins and the ability to infiltrate the stormwater up to and including the 50-year 24-hour storm event. In addition to reintroducing surface water to the ground, the proposed lining of the two infiltration ponds with 12 inches of crushed limestone gravel as a precautionary measure will help neutralize any potential for acid mine drainage.

The applicant has provided a waiver to address this comment as it relates to the projects potential to cause adverse impacts associated with the excavation project. The applicant believes that their proactive approach and proposal will satisfy the regulations which prohibit operations in areas that have the potential to cause Acid Mine Drainage. Should the Board feel comfortable approving this waiver we would recommend that the proposed Acid Mine Drainage Detection Initial Response Action Plan be reviewed by a third-party hydrogeologist. Fieldstone does not specialize in this area so we would recommend that the protocols and recommendations within this report be reviewed to ensure that they are in fact appropriate and reasonable action plans.

Part of this comment does also include surface water impacts as it relates to the Stormwater Management Report. Fieldstone has reviewed this revised report and we do not believe that the revised report accurately portrays the project under the post-conditions. Currently many of the subcatchment areas do not include impervious areas or include small amounts of impervious areas. This project will be a bedrock mining operation and as such there will be exposed vertical ledge faces and the restoration will consist of bedrock covered with loam and seeded in many areas. In HydroCAD, a shallow ledge area should be modeled using a subcatchment with a high runoff curve number (CN) and a suitable time of concentration (Tc). The CN should reflect the shallow ledge's limited permeability, potentially using a CN value between 80 and 90. This in our opinion would more accurately represent the post-construction conditions and associated stormwater runoff.

3. Section 25.3D: Surface Water Resources. The excavation perimeter shall be set back at least 250-ft, and the access driveway shall be set back at least 150-ft, from any surface water resource. The proposed excavation is located within 250-ft in a number of locations and the applicant is seeking a waiver from this section.

No response required.

It is our understanding that the Board still needs to consider this waiver request.

4. Section 25.3.3: The ground water table elevations need to be revisited in the reports.

There appears to be conflicting data from the test pits and soil borings regarding the location of the estimated seasonal highwater table. Depending on the results of this work other portions of Section 24.3.4 may or may not be applicable. For example, the excavation depths in Period 8 appear to show depths of excavation below the water table. Test pits and record boring logs show seasonal high-water tables that are encountered and proper separation for infiltration does not appear to be provided. Based on our review of the data it appears this project will need an exception from 25.3.3A as excavation appears to be proposed below 6 feet from the seasonal high-water table.

A groundwater monitoring well (SLR-12), installed by SLR International Corporation, observed a groundwater fracture within 18 inches of the existing ground surface. It is the project's intent to refrain from excavating this area. While there is no evidence that the fracture in which SLR-12 is located extends into the proposed excavation area, we are respectfully requesting this waiver to ensure continued compliance with Article 25.3.3.

The groundwater monitoring well which encountered high groundwater, is an anomaly. This particular well, drilled by a different company for another firm, unexpectedly encountered a high level of groundwater. The applicant noted during drilling that surface water was present nearby and appeared to be flowing into the well. It's important to note that a nearby well and test pit, located close to SLR-12, did not encounter any groundwater. Furthermore, all overburden and bedrock wells within the planned excavation area have also shown no groundwater.

While we believe the high groundwater reading in the anomalous well is likely inaccurate due to the observed surface water influence, we have taken care to avoid disturbing the adjacent grade. However, completely avoiding the adjacent area would unfortunately prevent the construction of a critical sedimentation pond. These sedimentation ponds are essential for effective site runoff control. They function by capturing and holding water, allowing sediment to settle out. This process is vital in preventing sediment from entering downstream water bodies and safeguarding water quality during the construction phase. If groundwater is actually encountered in the adjacent area, blasting operations will cease as MSHA, the protective protocols governing blasting, does not allow the blasting within groundwater. The floor of the basin is at elevation 842.00 and relatively half way between the wells. Based on this information, the water table was interpolated and estimated at 828.95.

The applicant's engineer has acknowledged that there is a conflict in the data provided but believes that the information submitted for Phase 1 by TFMoran likely does not accurately represent the conditions due to observed surface water in proximity to the well and therefore may be an anomaly. They have further stated that excavation within the groundwater is not permitted by MSHA and as such operation would cease at that time if groundwater was in fact encountered. They have also stated that the proposed stormwater features in this area are critical to the design of the site. We would recommend that further testing be performed in this

area to support the current design or third-party inspection of this area be performed during construction to verify that groundwater is not present. If groundwater is encountered this could significantly modify the proposal for the project and any associated changes would require local review and approvals.

5. Section 25.3.4.A.1: We have reviewed the soil logs and their proximity on the property. The number of observations appear to be appropriate at this stage but additional data may be required to support the current design. Additional investigation may also be required depending on the consultant's responses surrounding concerns for potential impacts.

See response to #4.

With the submission of the Acid Mine Drainage Detection Initial Response Action Plan Fieldstone would recommend that this be reviewed by a third-party Hydrogeologist to ensure that the protocols and monitoring are appropriate. At the Board's discretion, this could be reviewed as a condition of approval or prior to a vote on the waiver requests.

6. Section 25.3.4.A.2: The surface data table on Sheet 11 of 22 does not accurately represent elevations (existing and proposed) and separation to seasonal. The Hydrogeologic Investigation performed by SLR shows that boring log SLR-10 observed water at 840.1+/-, SLR-11 observed water at 817.8+/- and SLR-12 observed water at 888.5+/-. The finish grades in these areas appear to show interference. The plans do not show all of the record borings. For example, SLR-12 appears to be missing and the excavation at this location is approximately 855+/- which appears to be 30+ feet below the observed seasonal water table.

SLR

TABLE 1
GROUND SURFACE, WELL, AND GROUNDWATER ELEVATIONS
Tax Map 215, Lot 7
Route 9, Keene, New Hampshire
Project # 144.16535.00023

Well ID	Ground Surface Elevation (feet)	Proposed Excavation Depth	Well Elevation At Top PVC (feet)	Total Well Depth (feet)	Bottom Well Elevation from Ground Surface (feet)	PVC Well Screen Interval (feet)	Depth to Groundwater Date	Depth to Groundwater from Ground Surface (feet)	Groundwater Elevation (feet)
SLR-10	883 ±	854 ±	884.7 ±	55	828 ±	5-55	3/22/22	42.9	840.1 ±
SLR-11	863 ±	856 ±	865.3 ±	45.2	817.8 ±	5-45	3/22/22	dry at 45.2	817.8 ±
SLR-12	890 ±	858 ±	892.7 ±	39.5	850.5 ±	4.5-39.5	3/22/22	1.5	888.5 ±

The proposed grade at SLR-10 is 860.00 in period 1, and 855.00 in period 8. This grading is

approximately 15 feet above the observed water table found (840.1+/-). The proposed grade at SLR-11 is 880.00 in period 1, and 855.00 in period 8. This grading is approximately 37 feet above the observed water table found (817.8 +/-). SLR-12 is shown on sheets 5 and 10, and the existing grade at SLR-12 is 888+/-. The existing grade is to be maintained in this location. No excavation is occurring in this location.

The water table drops 22+/- feet between SLR10 and SLR11 and it is a relatively short distance between these two locations. We would recommend an additional test site between the two locations to ensure adequate separation to seasonal high water. This stormwater management area is critical to the design and operation of this site. This additional testing could be done between phases as a condition of approval should the Board feel comfortable with this recommendation.

7. Section 25.3.4B2: The data for the wells depicted on the plans (3 wells) should be provided and documented for baseline information. It would seem appropriate that the monitoring plan include one or more of these wells as well.

A revised monitoring plan has been developed and includes monitoring SLR 10, 11, and 12 that were previously installed.

This comment has been addressed.

8. Section 25.3.4B3A: The soil logs and borings in Period 8 do not seem to meet the requirements outlined in this section.

The section requires that wells be dug 50' below the proposed pit – if excavation is within the water table. SLR 10 and SLR 11 were both dug below the proposed pit bottom, and did not encounter the water table within our excavation limits. The proposed design does not propose excavating below the water table. SLR-12 is shown on sheets 11 and 16. It is currently located in the area between period 1 and period 8 in an area where grading is not anticipated. SRL-12 does show a water level greater than the adjacent proposed pit floor depth. All bedrock groundwater flow at the site is controlled by fracture flow and we have no evidence suggesting that the fracture in which SRL-12 is located extends into the excavation area. SLR-12 showed groundwater to be within 18" of the surface, however, both SLR-4 and test pit 6, both of which are within very close proximity to SLR-12, did not find groundwater. Overburden wells MW-1 through MW-8 did not encounter groundwater. Bedrock wells BRW-1 through BRW-6 did not encounter groundwater. Furthermore, due to the blasting means and methods, the excavation is limited to "dry-hole" areas only.

This comment has been addressed.

9. Section 25.3.4C: The proposed monitoring plan for this project does not match the frequency outlined in this section. The City shall determine if they are comfortable with the proposed frequency and if relief is required from this section of the regulations.

A revised monitoring plan has been provided that includes monitoring tables of both AMD and water level monitoring. It also includes both on-site and off-site water quality monitoring notes. See sheet 17.

This comment has been addressed.

10. Section 25.3.6: This section states " When the proposed operation includes the excavation of bedrock materials, the applicant shall demonstrate that excavation activities will not adversely impact surface or ground water quality through the unearthing of toxic or acid forming elements or compounds resident in the bedrock or soils. Such demonstration shall be made by obtaining the opinion of a NH licensed engineer or professional geologist. Excavation of bedrock shall not be permitted where bedrock contains toxic or acid forming elements or compounds." Per the Acid Mine Drainage Potential Report prepared by Frontier Geoservices this project has the potential to produce acid mine drainage. The report outlines that borings 1 through 8 have the elements or compounds that could produce acid mine drainage.

See Response to #2

The applicant has provided a waiver to address this comment as it relates to the projects potential to cause adverse impacts associated with the excavation project. The applicant believes that their proactive approach and proposal will satisfy the regulations which prohibit operations in areas that have the potential to cause Acid Mine Drainage. Should the Board feel comfortable approving this waiver we would recommend that the proposed Acid Mine Drainage Detection Initial Response Action Plan be reviewed by a third-party hydrogeologist. Fieldstone does not specialize in this area so we would recommend that the protocols and recommendations within this report be reviewed to ensure that they are in fact appropriate and reasonable action plans.

11. Section 25.3.7: This Section addresses Stormwater Management and states "Excavation activities within the excavation perimeter and the access driveway shall not cause adverse impacts from stormwater runoff and/or groundwater drainage, including erosion, sediment transport, water quality degradation, and/or increases in volume or velocity of water leaving the site".
    a. The stormwater management report and design for this project is currently incomplete as it does not evaluate the pre and post conditions. The submitted report does not include preconstruction conditions or properly model the phasing of

the project and the phased conditions throughout the project.

A revised Stormwater Management Report has been updated to show the pre and post development flows from the project area to the wetlands and drainage culverts adjacent and under Route 9. There is a net decrease in peak flow during all storm events, up to and including the 100-yr storm event, per the request of the Conservation Commission. The two-year pre vs. post volumes for channel protection have also been met.

Fieldstone has reviewed this revised report and appreciates the additional information. As mentioned previously in this letter we do not believe that the revised report accurately portrays the project under the post-conditions due to the nature of the project. Currently many of the subcatchment areas do not include impervious areas or include small amounts of impervious areas. This project will be a bedrock mining operation and as such there will be exposed vertical ledge faces and the restoration will consist of bedrock covered with loam and seeded in many areas. In HydroCAD, a shallow ledge area should be modeled using a subcatchment with a high runoff curve number (CN) and a suitable time of concentration (Tc). The CN should reflect the shallow ledge's limited permeability, potentially using a CN value between 80 and 90. This in our opinion would more accurately represent the post-construction conditions and associated stormwater runoff.

b. This should include monitoring the same observation points and modeling the closest downstream structures that route the runoff from the site.

See response above.

This comment has been addressed.

c. The original approvals for this site included the submission of a stormwater management report prepared by TFMoran that properly evaluated the pre and post conditions and storm events. Since this is an expansion of this project we would anticipate a similar submission for the expansion of this project. The submission should also account for the phasing of the project showing that the project meets the standards throughout the phasing periods.

Two pre vs post drainage models have been analyzed, which include an interim phase showing the project meets pre vs post flows during the phasing periods. During this interim phase, the temporary sedimentation pond SF1 is to be expanded. This pond will detain and infiltrate all the stormwater associated with the subsequent phases of work. Upon completion of period 7, and during period 8, as the pit floor in period 8 is lowered, proposed infiltration pond SF8 will be constructed. This will capture and infiltrate all of the stormwater associated with the project.

This comment has been addressed.

d. Other details to consider in the stormwater management report:
   i. The model should account for ledge and the associated impervious conditions and shallow ledge. The post conditions do not account for the amount of exposed ledge or shallow ledge resulting from the project. All of the subcatchments show 0% impervious cover and low CN's for the actual anticipated conditions. We believe the CN's used are not representative of post-construction conditions.

Ledge and associated impervious conditions, including gravel haul roads, have been reflected in the updated drainage analysis.

See comment from number 11 above.

   ii. Outlet structures seem to have orifice plates bolted to headwalls but do not seem to provide for emergency outlets for larger storms or in the event of clogging.

Outlet structures for the use of emergency overflow devices have been added to SF5, SF6, and SF7. Hydrocad has been updated with these structures as well as the details (pond detail updated, OCS structure details have been provided.

This comment has been addressed.

   iii. The report should compare peak rates and volumes at the two observation points.

See response to 11a.

This comment has been addressed.

   iv. Confirm adequate depths to ESHWT are being provided.

Both the temporary sediment basin SF7 and the final proposed infiltration basin SF8 have the required separation to ESHWT. See response to 4.

This comment has been addressed.

   v. Verify inlet conditions and culvert cover for cross-culverts.

Inlet conditions have been verified, and minimum cover has been provided for all culverts.

This comment has been addressed.

vi. Ditch (reach) modeling and capacity analysis should account for stone check dams.

Temporary stone check dams have been removed as ditches are proposed to be stone armored.

This comment has been addressed.

vii. The report and plans need to include an inspection and maintenance manual outlining all stormwater practices with recommended inspection and maintenance.

An Operation and Maintenance Manual has been included in the stormwater report.

This comment has been addressed.

e. It is unclear what the intentions are for handling stormwater and the transition between Phases or Periods.

See response to 11c.

This comment has been addressed.

12. Section 25.3.8: A review of site photographs and the plans provided shows that the project is currently not constructed per the prior approved plans. The drainage at the entrance is not completed and as such dust control and the transportation of dirt/mud off the site onto the adjacent roadway is occurring.

Plans have been revised to show improvements at the entrance. This work will include widening the paved apron, stone outlet protection, and grading a depression at the existing driveway culvert. Phasing notes have been added to sheets 5 and 10 to specify what items need to be completed associated with the access road and during which period. Additional notation has been included on sheets 5 and 10 that specify what items are to be constructed and when, based on the previously approved project.

This comment has been addressed.

13. Section 25.3.10: Note #21 of the Operations Notes makes reference to known important

Archeological sites. Please clarify if there are any such sites on-site.

Per a review by the NH Division of Historical Resources, there are no known resources to be impacted. This note has been eliminated.
This comment has been addressed.

14. Section 25.3.12: Per this section a fence or barricade shall be installed and the plans have a detail addressing this. Please clarify the intent regarding the timing of the installation of this fence for each phase or period of construction.

Operation notes have been revised to include the following: Earthen Berms Erected Around The Excavation Area Shall Be Placed Along The Outside Edge Of The Active Work Area But Not Within The Buffer Area, So As To Minimize The Visibility Of The Fence From Abutting Properties And Public Rights□Of-Ways. These Shall Be Erected At The Start Of Each Permit Period, And Shall Remain Until Pit Excavation Area Has Been Reclaimed.

This comment has been addressed.

15. Section 25.3.13: Per this section the excavation areas shall not exceed 5-acres. The applicant is seeking a waiver from this section.

No response required.

It is our understanding that the Board still needs to consider this waiver request.

16. Section 25.3.17: The access driveway and associated drainage and construction details does not appear to be completed as designed and approved for the initial approval of this project. This is evident if you compare the existing conditions plans with the details depicted on Sheet 10 of 22. There needs to be some clarification on what the intent is with the front end of this project and how it can be brought into compliance with the approved plans.

See response to 12.

This comment has been addressed.

17. Section 25.3.25: The plans should be revised to incorporate notes addressing record keeping per this section.

General note 27 on sheet 1 now reads: All logs required to be maintained by the applicant/operator shall be retained by the applicant for a period of not less than 5-years and

shall be made available to the community development department, or its designated agent, upon request.

This comment has been addressed.

18. Section 25.3.26: The applicant shall provide the Community Development Department copies of all local, state and/or federal permits required for this project.

No response required.

It is our understanding that the state and federal permits for this project are still pending and as such Fieldstone still recommends that these be considered as conditions of approval should the Board move in that direction.

19. Section 25.4.1D: To meet this requirement the Stormwater Management Report should appropriately model the pre and post condition design storms and evaluate observation points to ensure that the project will not have negative impacts to downstream areas. reclamation plan should be revised to incorporate notes from this section to ensure compliance with the City Code. This includes notes pertaining to incremental reclamation, topsoil, vegetation, monitoring and remediation as applicable.

The stormwater management report has appropriately modeled pre vs post conditions. The reclamation notes have been revised to include the pertinent notes from this section.

Please see comment from number 11 above.

20. Section 25.4.6: We would recommend that the reclamation plans be revised to incorporate the remediation note outlined in this section.

The reclamation notes have been revised to include the following: Excavation operations that cause adverse impacts shall abate and/or remediate those impacts, restoring all affected areas to pre-impact conditions. Reclamation shall not be said to be complete until all adversely impacted areas have been successfully remediated.

This comment has been addressed.

Plan Review – General Review Comments:

1. Sheet 1 of 22 – Operations notes #3 should mention the 250-foot wetland setback to excavation setback as applicable too.

General note #21 has included this information.

This comment has been addressed.

2. Sheet 1 of 22 – Operations notes #10 is not correct. The subject site is not self-contained and this note should be revised accordingly. There are areas of the site that are not self-contained including but not limited to existing access roads, etc.. This note misrepresents current and proposed conditions.

Operations Note 10 has been revised.

This comment has been addressed.

3. Sheet 1 of 22 – Operations notes #17 appears to conflict with the updated existing conditions plan as fuel is currently stored on-site. We would recommend the preparation and submission of a Source Control Plan due to the presence of hazardous materials on-site and the nature and size of the proposed project.

Note 17 has been removed. Refer to fueling notes on sheets 5 and 10. Fueling operations are proposed to be in compliance with Env-WQ 1510.08. Spill prevention measures currently on-site are located in the job trailer and consists of 55 gallon drum MS spill prevention barrels.

This comment has been addressed.

4. Existing Conditions Sheets should show setbacks and buffers. The limit of disturbance line on the updated existing conditions plan seems to represent a wetland impact on the east portion of the site. Please clarify and correct plan as applicable.

The excavation, drainage, and erosion control plan show both the current limits and proposed limits of disturbance, as well as all surface water / wetland setbacks. The area in which the existing conditions plan shows disturbance within a wetland is an existing disturbed area that has been restored and confirmed by Ecosystems Land Planning and by the City of Keene. See response to item #13.

As long as City Staff is satisfied with this response Fieldstone believes this comment has been addressed.

5. Sheet 5 of 22 – The temporary sedimentation basin needs additional detail. There appears to be no erosion and sedimentation controls, berm detail, emergency outlet controls and contour labels. Are other access improvements going to be included with this initial work?

The grading plans and details have been revised to include more information for the ponds.

This comment has been addressed.

6. Sheet 6 of 22 – the 30" culvert in Period 1 has two outlets labeled and I would check the cover over this pipe as the grading appears to be too shallow.

The culvert has one outlet HW#10B labeled. The culvert as proposed has been checked and meets or exceeds manufactures minimum requirements of 12" of cover.

This comment has been addressed.

7. Sheet 10 of 22 – What is the plan for transitioning form the temporary basin and into this final design? Reviewing the soils data seems to indicate that the basin design is too low and the excavation in areas will intercept SHWT. It looks like the existing trailer and facilities are in the way and should be moved.

As the pit floor is lowered, the temporary sedimentation basin will be expanded upon as excavation continues. By the time the pit floor has been excavated to elevation 860.00, the infiltration basin shown in period 8 will have been constructed to the proposed pit floor of 842.00. SLR-11 had noted water table at elevation 817.8. SLR 10 had noted water table at 840.1. The floor of the basin is at elevation 842.00 and relatively half way between the wells. Based on this information, the water table was interpolated and estimated at 828.95. The existing trailer and facilities are proposed to be relocated from their current location as shown on sheet 10, during the start of period 8.

The water table dropping 22+/- feet in this short distance is of concern. We would recommend an additional test site between the two locations to ensure adequate separation to seasonal high water. This stormwater management area is critical to the design and operation of this site. This additional testing could be done between phases as a condition of approval should the Board feel comfortable with this recommendation.

8. Sheet 12 and 14 of 22 – Additional Basin details are needed. Contour labels, berm detail, emergency outlet and associated details.

The plans and details sheets have been revised to include additional information for the ponds.

This comment has been addressed.

9. Has an EPA Notice of Intent (NOI) been filed for the current site operations? Please provide appropriate materials so we can verify compliance with the initial approved site plan.

An NOI for the 2022 NPDES Construction General Permit was filed and has been included.

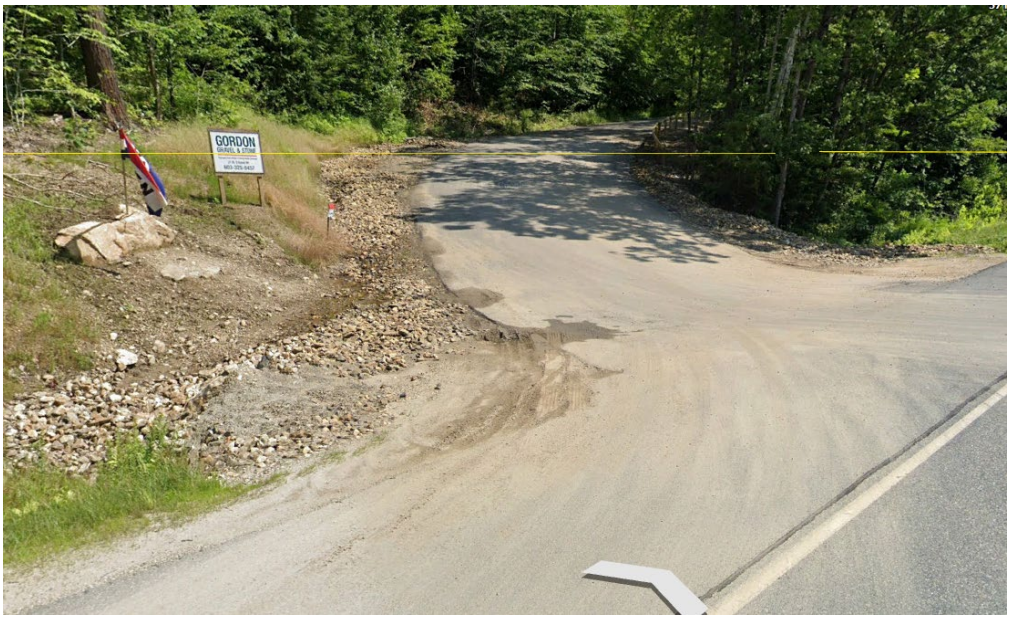
This comment has been addressed.

10. A reclamation bond will need to be established for the project prior to work commencing.

No response required.

We would recommend that this be handled as a condition of approval should the Board move in this direction.

11. The exiting conditions plan seems to indicate that the site is not currently in compliance with the previously approved plans. The plan appears to be missing drainage culverts, a stormwater management basin (infiltration basin), an outlet structure, an emergency spillway, slope benching, a reinforced drainage swale, drainage at the entrance, access roadway grading, stop sign at entrance, etcetera. See photo of entrance which depicts current conditions and a deviation from the approved plan.



Plans have been revised to show culvert and stone ditching to be added at the entrance. Phasing notes have been added to sheet 5 and sheet 10 to specify what items need to be completed associated with the access road and during which period. Additional notation has been included on sheets 5 and 10 that specify what items are to be constructed and when based on the previous approved project.

This comment has been addressed.

12. Existing conditions plans should show setback and wetland buffer areas to ensure there are

no impacts to those areas.

An updated Surface Water Resources Setback Plan has been included and addresses this comment and that shows the following:

- **Limits of disturbance**
- **Previously approved encroachments on surface water setbacks**
- **Proposed encroachments on surface water setbacks**
- **Previously restored areas of impacts on surface water setbacks**

This comment has been addressed.

13. We have highlighted two areas on the aerial photography below. Further information should be provided for these areas as they appear to be new impact areas. The arrow on the image also represents an area that appears to be seeing more drainage as there is significant erosion and soil loss which is visible from NH Route 9. We recommend that this area be investigated further.

The area circled to the west, located adjacent to the existing pit, was an area of restoration associated with the previously permitted gravel pit. Per A joint inspection conducted on

September 28, 2023 between the applicant, City Staff, and certified wetland scientist, it was determined that area had been successfully replanted. The second area circled is an existing cleared area that is evident on google imagery as far back as 2008, most likely a logging lay down area. The erosion along the perennial stream as noted on lot 8, the old Seafield Pines Facility, has been a known issue prior to the applicant owning the property.

This response implies that these areas have been addressed or that the issues are not the responsibility of the owner. Staff should determine if they are satisfied with this response. The last topic appears to be an existing erosion problem that is ongoing and should in our opinion be better understood and addressed. The erosion and failure could result in downstream and environmental impacts if not addressed. We believe further understanding, evaluation and recommendations should be provided as it relates to this

14. The phasing plans need to meet the detail and note requirements outlined in this section. It is difficult to decipher what improvements are required for each phase and how phases transition.

Phasing notes have been revised, as well as call out notes on the plans to address construction sequencing.

This comment has been addressed.

This concludes our review of the technical components for the above referenced project. Please feel free to contact us should you have any questions, concerns or require additional information.

Sincerely,
FIELDSTONE LAND CONSULTANTS, PLLC

Chad E. Branon, P.E.
Civil Engineer/Principal