

# FIELDSTONE

## LAND CONSULTANTS, PLLC

Surveying ♦ Engineering  
Land Planning ♦ Septic Designs

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August 14, 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 August 11, 2025
- Stormwater Management Report, dated July 9, 2025
- Revised Plan Set, last revised August 11, 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 May 30, 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.

*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.

***(Granite Engineering's May 30, 2025 Response)*** - *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.*

*(Fieldstone's May 30, 2025 Response) - 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.*

**(Granite Engineering's Current Response) - A revised stormwater management report has been provided which includes modeling the disturbed areas within the gravel operation with a high CN value of 80, modeled as >75% Grass Cover, Good, HSG D. These soils have a high runoff potential, very low infiltration rates when thoroughly wetted, and consist chiefly of clay soils with a high swelling potential, soils with a claypan or clay layer at or near the surface, and shallow soils over nearly impervious material. These soils have a very low rate of water transmission (0-0.05 in/hr).**

*(Fieldstone's Current Response) – The revised stormwater management report has been revised to reflect anticipated conditions within the subcatchment areas. This comment has been addressed.*

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.

*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.

**(Granite Engineering's May 30, 2025 Response)** - 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.*

**(Fieldstone's May 30, 2025 Response)** - *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.*

**(Granite Engineering's Current Response) - One monitoring well and four additional bedrock wells we drilled to determine potential groundwater depths. Those results can be found on the Monitoring Plan, and are as follows:**

MW- 9 (9-feet deep) Dry  
BRW-9 (50-feet deep) SWL 6.40 BG  
BRW-10 (85-feet deep) SWL 25.5 BG  
BRW-11 (85-feet deep) SWL 41.43 BG  
BRW-12 (90-feet deep) SWL 51.82 BG

The proposed pit floor in period 8 has been raised to provide the required 6' separation to excavation above the water table. The proposed pit floor in period 1, as well as the sedimentation basin (#7) have also been raised to provide the 6' separation from the water table.

*(Fieldstone's Current Response) – The third-party hydrogeologist (Sanborn Head) observed the borings and monitoring wells and has represented that there are potential conflicts with the groundwater and/or separation to groundwater in Period 1 and Period 8. This should be reviewed and the design and stormwater management report revised as necessary.*

*The stormwater report states that the design is relying on test pits performed by TFMoran but those test pits do not reach depths to verify soil materials and adequate separation to seasonal high-water table. The Subsurface Data table on the monitoring plan shows that Test Pit 1 and 2 go to depths of 867.0 and 863 respectfully and the infiltration basin in this area has a bottom elevation of 842.0.*

*SLR-10 which is outside of the infiltration area shows water observed at 841.1 (884-42.9) which would not provide adequate separation to the bottom of the infiltration basin at 842.0. The ground elevation per the topography depicted on the monitoring plan shows SLR-10 at elevation 890+/- not 884 per the table. If the elevation in the plan view is correct this would raise the observed groundwater level to 847.1+/- . BRW-12 which is inside the infiltration basin is not detailed on the monitoring plan but it is my understanding readings from BRW-12 may support*

*ground water elevations at approximately 830.9 during low flow conditions but the materials are not conducive to infiltration since bedrock was encountered. The table on the monitoring plan should be updated to depict all observations on-site and the data should be verified to ensure that all elevations are represented correctly.*

*The stormwater management design and model shall be revised and updated to reflect the site conditions.*

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.

*With the submission of the Acid Mine Drainage Detection Initial Response Action Plan Fieldstone differs to the third-party Hydrogeologist to ensure that the protocols and monitoring are appropriate.*

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.



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 ±

**(Granite Engineering's May 30, 2025 Response)** - 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.

*(Fieldstone's May 30, 2025 Response) - 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.*

**(Granite Engineering's Current Response) - See response to #4 above.**

*(Fieldstone's Current Response) – See our response to #4.*

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.

*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.

*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.

*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.

*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. Fieldstone does not specialize in this area so we would defer to the third-party hydrogeologist review and recommendations.*

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.

**Granite Engineering’s May 30, 2025 Response** - 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’s May 30, 2025 Response)** - 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.

**See response to #2 above**



***(Fieldstone's Current Response) - The stormwater management report has been revised to better represent the anticipated conditions within each Period of the project. This comment has been addressed.***

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

***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.

***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.

***This comment has been addressed.***

- 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.

***This comment has been addressed.***

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

***This comment has been addressed.***

- iv. Confirm adequate depths to ESHWT are being provided.

*This comment has been addressed.*

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

*This comment has been addressed.*

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

*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.

*This comment has been addressed.*

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

*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.

*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.

*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.

*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.

*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.

*This comment has been addressed.*

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

*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.

*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.

*This comment has been addressed.*

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

*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.

*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.

*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.

*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.

*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?

*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.

*This comment has been addressed.*

7. Sheet 10 of 22 – What is the plan for transitioning from 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.

**(Granite Engineering's May 30, 2025 Comment)** - 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.*

*(Fieldstone's May 30, 2025 Comment) - 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.*

**(Granite Engineering's Current Comment) - See response to #4 above.**

*(Fieldstone's Current Response) – See our comments in #4*

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

*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.

*This comment has been addressed.*

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

*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.



*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.

*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.





Although there is an existing stream on the adjacent property that has experienced historical erosion issues, our proposed project is located in a separate watershed. A perennial stream runs between the two sites and serves as a clear hydrologic divide. As such, any surface water generated by our project will not contribute to the flow or erosion concerns associated with the neighboring stream. Based on this separation, as well as the fact the gravel operation is self contained, we do not anticipate any impact from our development on the existing erosion issues off-site.

*Staff should determine if they are satisfied with this response. This area is removed from the proposed gravel operation but is in the vicinity of the access road that accesses the gravel operation in the adjacent Town.*

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.

*This comment has been addressed.*

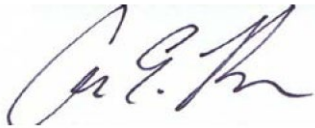
**New Comments:**

1. Will on-site vibration monitoring be done during blasting and crushing operations?  
Concerns have been raised regarding adjacent properties and potential damage nearby infrastructure associated with on-site operations. This type of monitoring is typically required to protect adjacent properties and to address liability issues in this industry. Please share how the site operations will address this concern and be consistent with city regulations. We would recommend adding a note to the plan set to document how the site operations will comply with city and industry standards.

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