



***Bethlehem Conservation  
Commission  
Bethlehem, NH 03574***

December 14, 2009

Mr. William A. Thomas, CWS  
NH Department of Environmental Services  
Wetlands Bureau  
29 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095

Re: File #2009-02372, Replacing File #2008-02621

Dear Mr. Thomas:

We are writing to support the Dalton Conservation Commission in its opposition to this new Standard Dredge and Fill Application. We also joined the Dalton Conservation Commission last year in its opposition to the previous application.

When we met last week, the Bethlehem Conservation Commission voted unanimously to send this letter. We agree with all the concerns expressed in the Dalton Conservation Commission's letter to you of November 19, 2009.

In particular, we would like to emphasize the following areas of concern:

- the ever-growing wetlands impact, which has increased from 1,761 square feet of impact to 1,920 square feet and now to 6,650 square feet;
- the three vernal pools found on the property;
- this site's position in the Highest Ranked Wildlife Habitat category in the state's Wildlife Action Plan; and
- the potential impact to the Ammonoosuc River, which has protected river designation.

Sincerely,

Cheryl Jensen, Chair, Bethlehem Conservation Commission  
Cc: Dalton Conservation Commission



**Bethlehem Conservation Commission  
Bethlehem, NH 03574**

December 21, 2008

William A. Thomas  
NH Department of Environmental Services  
Wetlands Bureau  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095

Re: File #2008-02621

Dear Mr. Thomas:

The Bethlehem Conservation Commission concurs with the concerns about the Dalton Valley Drag LLC project raised by the Dalton Conservation Commission in its well-documented letter to you of December 13.

Those concerns include potential disruption to the wetlands (some of which feed the "designated" Ammonoosuc River), increased pollution from the use and maintenance of high-performance racing vehicles, the concentration of as many as 1,000 spectators and their vehicles, disruption of wildlife including in the area identified as the "Highest Ranked Habitat in Biological Region," noise and light pollution, and the loss of quality of life in the area.

We also concur with the concerns of the Riverbend Subcommittee of the Connecticut River Joint Commissions. While the subcommittee has not specifically addressed this project, it has a position on Recreational Developments such as this in its new Connecticut River Recreation Management Plan.

In particular, the subcommittee has recommended that "towns should discourage development of intensive recreational facilities such as theme parks near the river to protect the environment and the passive recreational experience there." It specifically notes: "Recreational development near the river should not contribute pollution to the river, including sound. Noise from a racetrack, for example, would travel along the river and detract from the river's character."

We would also like to mention that Mr. Ingerson has had problems with a wetlands violation in the past, according to a past member of the Bethlehem Conservation Commission. Mr. Ingerson built a road crossing a wetlands without

receiving permission to do so. This was reported to the Bethlehem Conservation Commission and he applied for a permit "after the fact." That information should be in your files. We were unable to locate that report on the DES web site.

While the drag strip is not located in Bethlehem the tax map shows one parcel of land in Bethlehem belonging to Dalton Valley Drag LLC. In addition, we are concerned that the drag strip will be accessed from the current road to the gravel pit, the beginning of which, we believe, is in Bethlehem.

The overall proximity of this project means a significant, adverse impact our residents. Since we were not included in this process, we don't have access to the plans, but we are wondering whether Bethlehem should have been formally notified about this project because of the regional impact.

Also, has the Ammonoosuc River Local Advisory Committee been notified about this project and asked to comment?

The Bethlehem Conservation Commission has unanimously voted to ask that you note our concerns and our strong objections to this project.

Sincerely,

Cheryl Jensen, Chair  
Bethlehem Conservation Commission  
P.O. Box 189  
Bethlehem, NH 03574

cc:

Dalton Conservation Commission  
Dalton Select Board  
Bethlehem Select Board  
Bethlehem Planning Board  
Bethlehem Zoning Board of Appeals  
Littleton Conservation Commission  
Whitefield Conservation Commission  
Connecticut River Joint Commissions  
Carol Andrews, NHACC



*Bethlehem Conservation Commission  
Bethlehem, New Hampshire*

December 23, 2016

Mr. Ridgely Mauck, P.E.  
Alteration of Terrain Bureau  
NH Department of Environmental Services  
29 Hazen Drive, Concord, NH 03302-0095

Re: NHDES Waiver Request-Dalton Concrete, LLC – Alteration of  
Terrain AOT-0353, Project No. 16173

Dear Mr. Mauck:

At our meeting last night, the Bethlehem Conservation Commission voted to oppose the Alteration of Terrain waiver request for this project made by applicant Douglas Ingerson, Jr. and Horizons Engineering.

Mr. Ingerson proposes a significant project that abuts the town of Bethlehem. The project raises environmental concerns because of extensive wetlands, some of which feed into the Ammonoosuc River. (BCC letter of Dec. 21, 2008 to DES) We are also concerned about the lack of detail related to the current project.

We believe it requires the full scrutiny of the Department of Environmental Services. And we find nothing in the December 12 letter to your bureau that eases our concerns about the project, for example Mr. Don Bouchard's notation of wetlands "recently observed, and not included in the original AoT permit submission."

We are aware of the N.H. Water Council's conclusion this year that Mr. Ingerson did not delineate all the wetlands that would be impacted by his project.

This project has a history of problems with delineating wetlands and the commission believes there is no reason the project should be given the benefit of the doubt.

Back in 2009 our commission wrote to DES (BCC letter of Dec. 14, 2009 to DES) because of the Dalton Conservation Commission's concerns (DCC letter of Nov. 19, 2009 to DES) about growing wetlands impacts, which increased from 1,762 sq.ft. to 1,920 sq.ft. to 6,650 sq.ft, seemingly because they were never fully delineated. In 2009, following a public hearing on the project, the Army Corps of Engineers mapped the proposed site and found the area of impacted wetlands was significantly greater than portrayed in the original application.

We also see a red flag because Mr. Bouchard notes that "Horizons Engineering was not tasked with reviewing or evaluating the approved drainage structures, plans or details." We think someone should review that information as well as the entire project as proposed. We

note that there may be less impact on the wetlands but, given concerns about erosion and runoff as well as the other issues noted, we think there should be a full review by the NH DES.

I will put a copy of this letter and copies of all other letters mentioned in the mail next week in addition to sending this by email.

Sincerely,



Cheryl Jensen, Co-Chair, Bethlehem Conservation Commission

Attachments:

BCC letter of Dec. 21, 2008 to DES  
BCC letter of Dec. 14, 2009 to DES  
DCC letter of Nov. 19, 2009 to DES

Letter to:

Dalton Conservation Commission  
Ammonoosuc River Local Advisory Committee  
Don Bouchard, Project Manager, Horizons Engineering