

Dalton Conservation Commission  
756 Dalton Rd.  
Dalton, NH 03598

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DEC 17 2008

DEPARTMENT OF  
ENVIRONMENTAL SERVICES

To: Gloria S. Andrews  
NH Department of Environmental Services  
Alteration of Terrain Program  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095

Cc: Dalton Board of Selectmen, Dalton Planning Board, Town of Dalton Clerk, Bethlehem Conservation Commission, Littleton Conservation Commission, Whitefield Conservation Commission

From: Dalton Conservation Commission

Date: December 13, 2008

Re: Alteration of Terrain Permit Application #080730-01  
Map/Lot No. 406/2.3  
Chick's Midway Raceway, Dalton, NH

Dear Ms. Andrews,

The Dalton Conservation Commission (DCC) wishes to make further comment regarding Alteration of Terrain Permit Application #080730-01 from Chick's Midway Raceway also known as Dalton Valley Drag, LLC, owned by Mr. Douglas G. Ingerson, Jr. As we reviewed your letter of September 16, 2008 and his more recent application for a Minimum Impact Expedited Application to the Wetlands Bureau, we became increasingly concerned about potential wetlands disruption.

The DCC scheduled and completed a site visit with the landowner, Mr. Ingerson on Tuesday, December 9, 2008. Mr. Ingerson was very helpful, guiding us around the site and explaining how he is attempting to minimize the wetlands impact the Drag Strip will impose. We appreciate his efforts, but continue to have serious concerns about this project and its effect on immediate and surrounding wetlands areas, including the Ammonoosuc River, one of New Hampshire's Designated Rivers, only ½ mile away.

We also want to note early in these comments that the area of Dalton in which this race strip is proposed is within the highest value category in the State Wildlife Action Plan (see attached map). We will address this issue further later in our comments.

### Impact on Wetlands Areas

The DCC expresses the following concerns relative to potential impact on important wetlands areas within the Town of Dalton.

1. **Pollution** - Concern about oil, grease, gas, and exhaust pollution from racing machines including – as indicated by the applicant during the site visit - cars, pickup trucks, motorcycles, and snowmobiles. The operation of any gas powered machine, of course, puts pollutants into the air which settle into the ground and groundwater. When such motorized vehicles are pushed to the limit during operation on a drag strip, we are concerned about the increased exhaust pollution as well as oil and gasoline leakage or spills and their effective containment.

In the DES Environmental Fact Sheet WD-DWGB 22-4 it states:

*Sixty percent of New Hampshire residents rely primarily on groundwater for their drinking water. Recognizing the importance of protecting the natural quality of groundwater, the legislature passed the Groundwater Protection Act (RSA 485-C) in 1991. This legislation recognized that a wide variety of activities involve the use of materials that can, if not properly handled, contaminate groundwater. There have been numerous instances of groundwater contamination in New Hampshire from leaking storage facilities, improper waste disposal, accidental spills, and even from normal use of these materials.*

2. **Increased human activity** - Concern about the impact on the watershed of up to 1,000 spectators parking up to 500 cars in the proposed parking area. This vastly elevated human activity with the cars they drive, the restrooms and human waste disposal needed, and the trash and garbage they will generate is not adequately addressed in the application to alleviate potential detrimental effects on the watershed.

3. **Garage location** - Concern about the location of the garage which will service the dragsters. The garage is not on the map, but where the applicant indicated it would be located appeared to be very near a recognized wetland area. The application and accompanying map do not mention or show the location of this garage and the additional impervious surfaces needed to access same.

4. **Proximity to wetlands** – Not only are there immediate wetlands affected, totaling 1,761 sq. ft. per the application, but many acres of important nearby wetlands are imperiled. One of the five most significant wetland areas in the Town of Dalton, the Alder Brook Wetland Complex (see attached), begins up the mountain from the proposed race strip and runs down just to the West less than ½ mile from the proposed site and into the Ammonoosuc River, which itself is only ½ mile away. As previously mentioned, the Ammonoosuc River has been classified as one of New Hampshire's Designated Rivers, a critical waterway for the North Country.

In the DES Environmental Fact Sheet WD-R&L-20 it states:

*The Ammonoosuc River is a high quality fishery for both cold and warm water species and according to N.H. Fish and Game Department the river is suitable for wild, self-sustaining populations of brook trout. The Ammonoosuc River is stocked annually with Atlantic salmon, rainbow, brook and brown trout.*

If polluted water drainage from the proposed drag strip seeps into the Alder Brook Wetland Complex and/or directly into the Ammonoosuc River, not only will it degrade the drinking water supply of 60% of New Hampshire residents, but it will affect New Hampshire's recreation and tourist industry by reducing the available fish populations.

## **Disruption of Wildlife Habitat**

The area of Dalton Mountain's ridgeline to the north of the proposed development consists of mature oak stands and steep slopes with south/southwest aspect. This is valuable habitat for black bear, bobcat, white-tail deer, and moose. This ridgeline is identified by the New Hampshire Wildlife Action Plan (WAP) as supporting habitat for the Alder Brook area which the WAP identifies as "Highest Ranked Habitat in Biological Region" (please see attached map/Wildlife Habitat by Ecological Condition)

These large mammals are far ranging and utilize the Alder Brook drainage to travel through critical portions of their home ranges which include low wetlands and the Ammonoosuc River situated in the corner boundary of four towns (Bethlehem, Dalton, Littleton and Whitefield). Alder Brook's headwaters are on Dalton Mountain with the brook flowing into an approximate 200 acre wetlands complex situated in both the towns of Dalton and Littleton. The wetlands complex is adjacent to the proposed site of Dalton Valley Drag, LLC on the west side with Forest Lake State Park in Whitefield approximately a mile to the east. Alder Brook enters the Ammonoosuc River in Bethlehem on the southwest side of the site. (See attached report/Functional Assessment of Wetlands throughout Dalton and map/Wildlife Habitat Land Cover)

Habitat for wildlife with lesser home range (small mammal, songbirds) within the immediate development area could be in jeopardy of losing use of their present habitat.

In the DES Environmental Fact Sheet ID-5 it states:

*"Human activity introduces changes to the surrounding environment that can negatively impact natural habitat. Changes in lighting in an area, for example, can significantly affect some species' behavioral and biological rhythms, which are guided by natural cycles of light and dark. Nocturnal species, particularly birds, can become disoriented by night-time lighting... Human recreational activity in an area may directly impact wildlife and reduce the quality of the habitat provided. Human activities can disturb sensitive habitats, like wetlands, and disturb or "flush" wildlife. Flushing wildlife raises an animals' stress level and increases energy consumption. If repeated frequently, such disturbance can impact reproduction and survivorship."*

And

*The loss of habitat through the conversion of land from its natural state to a developed landscape*

*represents the single greatest impact of increased human activity on native wildlife... .. Habitat fragmentation is a less obvious consequence of development, reducing both the quantity and quality of habitat. Fragmentation is a process whereby large tracts of the natural landscape are gradually developed and subdivided until only patches of original habitat remain. The patches are often too small and too far apart to support the basic survival and reproductive needs of many wildlife species during various stages of their life-cycle or in different times of the year. When a species' habitat is separated by distances that make movement from one patch to another impossible, the impacts on the genetic health of the population are significant and reduce a species ability to reproduce and withstand stress. In addition, smaller habitat patches and the wildlife that depend on them are more vulnerable to the catastrophic effects of natural disturbances such as fire and ice storms.*

It is impossible to quantify the degradation of habitat use at the time of pre-development of this site, but it stands to reason that this type of activity will negatively impact use of wildlife habitat due to increased pollution from racing car exhaust, gasoline and oil leakage, excessive noise, increased human activity in the area and the construction of impervious surfaces.

### **Aesthetic Interests of the General Public**

The Town of Dalton is working on their Master Plan. In a survey conducted for this plan, quality of life was identified as an important value for many in the Town of Dalton. The DCC is concerned about at least three issues related to quality of life:

1. Noise: This concern has not been addressed by the applicant for wildlife impact or for aesthetic interests of the public. In response to the question about plans for noise abatement, applicant said the racing strip would be open from 7 am until 9 pm (or later in the summer months) so that there would be no noise issues during the night. In addition to noise from the actual racing, applicant plans to have a fully equipped garage with dynamometer. There is no plan in the application for noise abatement.
2. Lighting at night: Applicant indicated that plans call for 4-1,000 watt halogen lights for each ¼ mile of the race strip. In a time when more and more concern is expressed by the general public for lighting pollution, there is no mention in the application for concern for light abatement.
3. Viewshed: The entire drag strip course will be visible from homes situated on the surrounding mountains, especially those on Mann's Hill Road in Littleton. There are no provisions for minimizing viewshed degradation in the application.

### **The Application**

In reviewing the application, in addition to items previously mentioned, the DCC questions some of the assumptions inherent in the application.

For example, in response to item #5 on the application, it states "All post drainage flows will not exceed what exist now, therefore there will be no adverse impact to down stream abutters." It

may be true that volume will not increase, but this statement in no way addresses the potential and probable contamination of the wetlands by increased oil, grease, gasoline, exhaust, and other carbon deposits generated by numerous high-speed drag strip racers, not to mention additional contamination by increased land usage by the participants and spectators.

Also in response to item #5, the application states "To construct a 1/8 mi. drag strip, later to expand it to a 1/4 mi." This is misleading. In fact, that distance measures only the actual racing surface. The applicant informed us that for a 1/8 mile strip, an additional 1/8 mile is needed to reduce the speed and slow the racing machine which then drives back on a return strip at a lower speed. Likewise if the strip is expanded to 1/4 mile, an additional 1/4 miles is needed for speed reduction. It gives the impression that the total drag strip is smaller than it actually is.

In response to item #6 on the application, and in review of the preliminary site plan, it appears to the Commission that the application does not reflect awareness of the value of wetlands in preserving water quality for the residents of Dalton and other towns in the North Country.

In addition, there is nothing in the application that addresses the negative impact to wildlife that will be generated by noise pollution, light pollution, disruption of wildlife habitat, and substantially increased human activity,

## **Regional Impact**

The regional impact of this proposed project is much greater than appears at first glance. Not only is it possible that the water resources be impacted for the Town of Dalton, the Town of Littleton (c. 1/10 of a mile away), the Town of Bethlehem (c. 1/10 of a mile away), and the Town of Whitefield (c. 1/2 mile away), but also the water resources for sites downstream for the Ammonoosuc River. Communities all along the Ammonoosuc depend on the river for water and for recreational activity.

In the DES Environmental Fact Sheet WD-R&L-20 it states:

*Publicly owned recreation areas include the White Mountain National Forest Zealand Mountain trails in Carroll, the town park in Lisbon, Dells Park in Littleton, the Bath Covered Bridge Picnic Area, and many state and federal snowmobile trails in every town. These areas offer a mix of recreational opportunities including hiking, nature study, picnicking, swimming, river access, recreational fields and snowmobile trails.*






The DCC suggests that the potential disruption through degraded water resources, wildlife habitat, and quality of life for residents of such a large part of the North Country calls for DES to deny this application for a drag strip in the Town of Dalton.

Sincerely,



Ed Tomashek,  
Chair, Dalton Conservation Commission

# HIGHEST RANKED WILDLIFE HABITAT BY ECOLOGICAL CONDITION

-  Highest Ranked Habitat in NH
-  Highest Ranked Habitat in Biological Region
- Biological region - TNC ecological subregion for terrestrial habitats or watershed group for wetlands and forest floodplains.
-  Supporting Landscapes
-  Conservation land
-  GPS points collected by Dalton C.C. during site walk

