



Warner River Local Advisory Committee

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Warner, New Hampshire 03278

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Via email: landuse@warner.nh.us; benjamindfrost@gmail.com

September 4, 2020

Ms. Deb Moody, Land Use Secretary

PLANNING BOARD

TOWN OF WARNER

P.O. Box 265

Warner, New Hampshire 03278

RE: Proposed Retail Development Review
Comet, LLC
9 Route 103 West
Warner, New Hampshire

Dear Ms. Moody:

Warner River Local Advisory Committee (WRLAC) has reviewed Comet, LLC's revised civil engineering plan set (dated 07-10-2020) as prepared by Ranger Engineering Group, Inc. of Methuen, Massachusetts. Kindly note that the proposed development is within the Designated Warner River Corridor; as such, we think it imperative that the proposed 9 Route 103 West development take into consideration its critical location along the Warner River. We have reviewed the revised site plans and still have a number of questions and comments that we would appreciate the Warner Planning Board take into consideration during their deliberations regarding Comet's Site Plan Application.

We are very concerned about the potential that the proposed development will discharge stormwater with little to no treatment directly to the wetlands that border the Warner River; the provisions for post-construction stormwater management are little-changed from the original design drawings submitted last spring. That being said, the plans and provisions for stormwater management are still wholly inadequate for a proposed development within a Designated River Corridor in New Hampshire and seemingly ignore the location of the site adjacent to the Warner River:

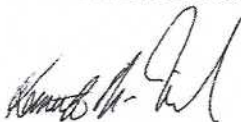
1. Applicant's civil engineering drawings should depict the Designated Warner River Corridor.
2. We are unclear on the "Warner River" line shown on Sheet CS0201 (Existing Conditions Plan). Is this the ordinary high-water line?
3. We think the correct term is "Shoreland Water Quality Protection Line", "Surface Water Quality Protection Act Line", or "Shoreland Buffer" and not "Shoreline Protection Line". Applicant should change their drawings to use the correct terminology.
4. We did not see provisions for removing or reducing dissolved pollutants (such as fertilizers from lawn care and landscaping or deicing salts from the paved areas). WRLAC would like to see provisions added that will minimize potential impacts from dissolved pollutants, and Applicant's plans should include pre-construction chemical monitoring to establish a pre-development baseline. Further, as we wrote in our letter of 05/28/2020 to Warner Planning Board, we request that the Applicant commit to incorporating Best Management Practices for winter roadway maintenance into their post-construction operating and maintenance plan, and the Applicant should employ only winter maintenance firms with DES "Green SnowPro" certification.
5. We reiterate this excerpt from the Aries Engineering report of July 30, 2020: ". . . snow storage areas [should] drain to the site closed drainage system so that road-salt-contaminated snow melt water and stormwater runoff can be captured and treated by the proposed stormwater infiltration system."

6. The Applicant has proposed elevated grates to prevent entry of turtles into the stormwater system. Is this the only alternative the Applicant evaluated? Are there other, more protective, solutions? If turtles get into the stormwater system, will they survive?
7. We have not seen an evaluation of the potential impacts from the detention pond/surface sand filter on the adjacent, bordering wetlands.
8. The Applicant has not submitted drainage calculations for Swale-1 or the other drainage swales between West Main Street (Route 103) and the property. These swales will receive significant amounts of stormwater from Route 103, and the management of the stormwater in these adjacent areas should be designed in conjunction with the stormwater management on the Site proper.
9. Grading to develop drainage swales and driveways will require NHDOT approval and easements. Should these be depicted on the project plans?
10. The design should clearly state that the sand and debris from the catch basins, sediment forebays, and infiltration galleries should be disposed of off-site and in accordance with BMPs and NH regulations.
11. The design should clearly specify that the sand and debris from the annual roadway and parking lot sweeping should be disposed of off-site and in accordance with BMPs and NH regulations.
12. The Erosion & Sedimentation Control Plan should clearly state that the sand and debris from the catch basins, drainage manholes, and stormwater piping should be disposed of off-site and in accordance with BMPs and NH regulations.
13. The Applicant has likely not identified the source of the water that will be needed during construction of the proposed development. WRLAC would like to see provisions that will impose limits and require documentation of withdrawals of water from the Warner River during construction, and require best management measures that will minimize the physical impacts to the wetlands, the river's flow, and the riverbed during the withdrawals.

By this letter, WRLAC again urges the Warner Planning Board to not accept this application for further consideration until the Applicant has provided the additional information requested above.

We appreciate the Board's attention to our concerns. Please contact me if you have questions or require additional information.

Very truly yours,
WARNER RIVER LOCAL ADVISORY COMMITTEE



Kenneth W. Milender
Chair

cc: via email B. Frost (Warner Planning Board)