



Introduction:

Good evening, Matt Peterson with Keach Nordstrom Associates here representing the proposed special exception and variance at Tax Map 43 Lot 20-2 at the corner of Route 13 and Nathaniel Drive in Milford NH.

Groundwater Protection Map:

Over the last few months, I have researched and reviewed more information on the Town of Milford's Groundwater Protection Map than I ever thought I would, and how it might have been created and what it is protecting in the area of our proposed project. As I am sure you all must know at this time, there is an isolated area under the Route 101 and Rout 13 interchange that is classified as Level 1 Protection area and it extends into our property with a small portion of the area outside of our lot.

So, I would like to do in introduce the information I have obtained and outline my findings with this board. First thing I would like to bring to the board's attention is the area of the Level 1 Protection Area that we are talking about, when you review your plan, you will see two wells that appear to be the reason the town added this area to the groundwater protection area. These wells are two privately owned and operate wells for two daycares in Town. And per the NHDES One Stop search engine you can see that one of the wells is inactive, at the state level, and both are not actual water usage wells, which would generate 20,000 gallons of water per day, and as such I have no idea why the town would be protecting private wells with this map. It also brings into question why an area under an NHDOT interchange would be considered an area to protect and in my opinion it's not in the public's interest it's in a private citizen interest and I would then ask then why not include everybody's well in town, especially now that both sites have the ability to tie into the Town of Milford water system.

Next, I want to talk about the Ground Water Resources in New Hampshire: Stratified-Drift Aquifers publication prepare in 1995 and how that plays into the protection of the aquifer in Milford, NH. As you read through this publication, we will read all about the testing they did from 1975 to 1985 and what they found. You then add-in the 1987 Hydrogeology of Stratified-Drift Aquifers and Water Quality in the Nashua Regional Planning Commission Area South-Central, New Hampshire publication and find the following:

1. The Town of Milford's most valuable and in need of protection area is along the Souhegan River (page 31) and not the area that this project is proposing to be built in.
2. And I would go one step further and suggest that if this board was really worried about the protection of the Towns resources, they would allow the permitting and construction of this gas station, which is the furthest from the Souhegan River and the Towns drinking wells in hopes that the old stations, that in Milford, and mostly located along the Souhegan River corridor.
3. Lastly if the two private wells were not included in the Town Groundwater map, you can see from the exhibit that this location would be one of the only places to construct a new gas station.

Now that takes me to the wetland impact on site and the overall site plan package.

1. First off KNA did a Wetland function – Value Evaluation Form per our NHDES Wetland permitting criteria and as outlined at the previous hearing and here tonight there wasn't one yes answer to all the question that we are required to answer from:
 - a. And that is from Groundwater recharge to wildlife habitat to endangered species.
 - b. You can see there are 13 Function/Value of wetlands per state of NH standards and this on-site puddle didn't meet any of those suitability criteria.
2. Then we did our NHB and obtained a clean letter from the department.
3. Lastly, we did our research into threatened and endangered species in the area and again they came back with "There are no critical habitats within your project area under this office's jurisdiction." (Page 3 dated – 10/11/2022.

And then finally to the site plans:

1. KNA has made a slight modification to the plans per comments received from the Town, on sheet 3 of 5 you will notice that we removed one of the proposed diesel island pumps and pulled the pavement back in this area.
2. Again, as outlined in previous presentations the need for the two access points is to safety design and permit a gas station that allows deliveries to happen and the site to function without conflicts that could create accidents or confusion on site.
3. Now the biggest item that will protect the ground water is our proposed stormwater management design.
 - a. As I outlined at the last hearing, we have proposed 4 Bioretention ponds on this site to collect and treat the site runoff.
 - i. These are made of 12" Coarse Gravel a 3" layer of Pea Gravel and 18" of Manufactured soil on top of that.
 - ii. Also unbeknown to me at the last hearing all these bio retention areas' have an outlet structure that then empties into the underground detention pond before being discarded off site.
 - iii. So not only are we new construction, but we have also built multiple redundancies into our drainage system to create as safe a facility as can be constructed in 2023.

Lastly regarding the actual tanks in the ground, I just want to submit to you that we would be using double lined tanks with all the 2023 bells and whistles on them to ensure no impact to the Town of Milford ground water aquifer.

So, in conclusion I believe that we have:

1. Outlined the need for the project to allow for a safe design of a gas station to ensure no conflicts on site occur that could cause accidents.

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2. The plan is the least impact due to the actual wells the town is trying to protect, and the actual quality of the poor wetland on site.
3. There will be no impact to plant, fish, and wildlife per the NHDES Wetland Function – Value Evaluation Form prepared by a licensed firm Keach Nordstrom Associate's.
4. That this site will have no impact on the quantity and quality of surface and ground water per the NHDES AOT requirements that the site is designed under.
5. That this site is designed to not have any effect on flooding, erosion, or sedimentation because it will be required to obtain an NHDES AOT permit, which functions to protect those things from happening.
6. This 2,299 SF wetland as stated on the site walk was most likely create by the pushing of snow from the abutting parcel over the only stormwater outlet on the East side of Route 13 in this area and as such it isn't tied to any other wetland complex around the area. This has been outlined by our wetland scientist in their wetland report.
7. This is an isolated wetland so the impact of it would not have any impact on other wetlands and the 4 proposed Bio-retention areas will do more in this area to clean and control the stormwater runoff than the little wetland depression on site has been doing.
8. The applicant will add a note to the construction plans the any invasives that are present on the property would be handled per the NHDOT manual on removal of invasive species.

Thank you for the time to outline the information tonight and I can answer any question you might have.