

To: Tracie Sales
Rivers & Lakes Programs Manager
NH Department of Environmental Services

Tracie,

The Upper Valley River Subcommittee (UVRS) of the CRJC has briefly reviewed the Surplus Land Review proposal dated February 8, 2019 and submitted to the Council on Resources and Development by NHDOT. As authorized by RSA 483:8-a III (b), we are required "To consider and comment on any federal, state, or local governmental plans to approve, license, fund or construct facilities that would alter the resource values and characteristics for which the river or segment is designated."

We have concerns that the long-term leasing of land in the Westboro Rail Yard for a propane loading facility may have impacts on the Connecticut River. The plans we have received lack a graphic scale, so it is unclear whether parts of the project are within the 250' Shoreland Water Quality Protection Act, regulated under RSA 483-B. It is also unclear whether the project involves any new construction or alteration of terrain. It is our understanding that the old railroad facility contains hazardous materials, which, if disturbed by new construction, could affect water quality in the Connecticut River. Also, the storage of propane or other fuels and the daily operation of trucks and trains could also impair water quality.

Our representatives from Lebanon report that the City has been in negotiation with NHDOT for many years in an effort to clean up the site and to provide riverfront park space and recreational opportunities. We are concerned that long-term leasing of a part of the Westboro yard would hinder these improvement efforts.

The UVRS requests clarifications from NHDOT on issues mentioned, and others that may become evident as a result of NHDES and local review. As with any project along the Connecticut River, we normally have a site visit with representatives of the applicant.

We will be submitting a formal response to CORD prior to the March 14, 2019 deadline. In the meantime, please consider this e-mail as a preliminary response. We look forward to the assistance and direction of the RMAC as we continue our review of this project.

Jim Kennedy
Hanover Representative, Chair
Upper Valley River Subcommittee (UVRS)
Connecticut River Joint Commissions
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