

Attachment 9

Erosion Control Memo

- Proposed erosion control measures do not meet the minimum erosion and sedimentation control standards recommended in NHDES's "Stormwater Management and Erosion Control Handbook for Urban and Developing Areas in New Hampshire (August 1992).
- Drawings EC-2, EC-3 and EC-8, "Erosion Control Plan" indicate that a single row of hay bales will be placed at the toe of steepened (1.5:1, or 66%) fill slopes for erosion and sediment control (Drawings LM-2, GD-2, GD-3 and GD-8). This is inadequate.
- Subsurface drainage measures (e.g. swales, Application pg. 89) are not adequately addressed.
- Shallow groundwater (2 to 10 feet depth, northern portion of site; Application pg. 5) and proposed excavation depths indicate construction dewatering and groundwater management will likely be required, and construction dewatering (quantities, treatment, and impacts on site hydrology and wetlands) is not discussed.
- Quantitative impacts [volume of water diverted] to surface hydrology (wetlands) are not evaluated but will be both a temporary impact (during construction) and a permanent impact due to the major terrain alterations which result from the road cuts necessary for installation of the race track.
- The maximum height and slopes of the temporary construction stormwater control berms (Application pg. 90) are not provided.
- The Application states that the slope of the site is "gradual" (p. 3). The average slope across the developed portion of the site is roughly (1,130 – 450 feet MSL)/ 4,300 feet = 16%. The Town of Tamworth (Master Plan Update; March 1995, page IV-3; referenced in the Application) classifies land with slopes greater than 15% slopes as "steep".
- The Erosion Control drawings indicate that steep (50%) cut slopes nearly 80 feet high and over 200 feet long will be required, greatly increasing runoff and erosion on the site. (Drawing EC-12, "Erosion Control Plan" track Station 110+50').
- Cuts of 50 feet (e.g. an approximately 80-foot-tall, 210-foot-long cut slope shown in the vicinity of the proposed hotel (Drawing EC-12, "Erosion Control Plan", Tack Station 110+50')) will create a swath of disturbance exceeding 300 feet in many areas. Depth to bedrock is likely shallow at most excavation sites (see Application pg. 7). Excavation into bedrock to the depths proposed could very likely require drilling and blasting. The Application did not include a bedrock blasting plan.
- The use of a portable rock crushing operation (Application pg. 81, 84) will create significant noise impacts during construction.

- Page 3 of the Application (“Project Description”) states that clearing and rough grading will be conducted for all Phase 1 and some Phase 2 components, yet the Phase 2 construction may not be initiated until after one or two years following completion of Phase 1 construction. In addition, the text implies that Phase 2 construction may never be implemented due to market conditions or if Phase 1 operations are not successful. It is likely that the temporary erosion control measures anticipated for a portion of Phase 2 would not provide effective erosion control for the extended period of time after Phase 1 clearing and grading. If the cleared and rough graded areas are allowed to remain without final construction and stabilization measures, the potential for erosion and sedimentation of wetlands and surface water will be unacceptable.