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April 27, 2004

Mr. Collis Adams  
Administrator, Wetlands Bureau  
New Hampshire Department of Environmental Services  
6 Hazen Drive  
Concord, New Hampshire 03301

**Re: Comments to Motorsports Holdings LLC  
Wetland Permit Application No. 2004-00377**

Dear Mr. Adams:

I write on behalf of members of a citizens' group called Focus:Tamworth regarding the Standard Dredge and Fill Permit Application (File No. 2004-00377) filed on March 5, 2004 by Motorsports Holdings, LLC ("MSH"), to request that the Department deny the permit for failure to comply with numerous statutory and regulatory criteria under New Hampshire RSA Chapter 482-A and the regulations adopted pursuant thereto. The application is incomplete, and inaccurate. The comments on the application developed by our professional team, including Rath, Young & Pignatelli (legal counsel), Haley & Aldrich, Inc. (environmental and civil engineering consultants), Harris Miller Miller Hanson, Inc. (sound engineer consultants), and Ecosystems Management Consultants of New England (wetlands and wildlife biologist consultants), are attached, as well as a color copy of the PowerPoint presentation we plan to present at the hearing this evening.

The Motorsports Holdings, LLC project to be constructed on 251 acres off Route 25 in Tamworth, New Hampshire is a "major" project in every aspect of the word, including the wetlands definition set forth in New Hampshire Admin. R. Wt 101.49. Upon completion, it will include a private country club/motorsports facility with a 3.1 mile road course, 7.1 acres of paved paddock area, a 10,000 square foot administration building, a 4,000 square foot maintenance building, a 10,000 square foot auto repair and high performance tuning shop with 6 service bays, up to 183 multi-story garagemahals for auto storage below and living quarters above, a 2,000 square foot race control building, a 50-seat grill-type restaurant and bar, a 20,000 square foot concrete pad housing a mobile racing fuel distribution system, a 75-room hotel with a 300-seat restaurant and a 50-seat lounge, a lower clubhouse with a locker room (120 lockers) and showers, 5,000 square feet of meeting and retail space, and a 100-seat pub style restaurant, various access roads, and vehicle parking areas.

The 251 acre site in Tamworth, New Hampshire on which the project will be constructed is centered on the north slope of Mt. Whittier in the Ossipee Mountains. The Ossipees are a

visually dramatic range of mountains in east central New Hampshire and are considered the best example of a “ring dike” in North America. The site is also located directly over primary and secondary recharge areas for the Ossipee Aquifer, which is New Hampshire’s largest stratified-drift aquifer. The aquifer, which is the major source of drinking water for Tamworth and many surrounding towns, is a high-yield aquifer that can recharge quickly with rainwater, but which is also vulnerable to contamination. The site is surrounded by approximately 20,000 acres of conservation and recreation lands, including approximately 10,000 acres of the Chocorua Forest Lands, the 5,540 acre Castle in the Clouds property in the Lakes Region Conservation Trust, and the 3,000 acre Ossipee Mountain Preserve in the Lakes Region Conservation Trust.

Upon construction, the project will:

- impact more than 130 acres of the site, (Application, p.67);
- create at least 45 acres of impervious surface, (Application, p.79);
- impact *far* more than an acre of wetlands;
- through construction and tree canopy removal, disturb more than 190,000 square feet within a 25-foot setback of wetlands and streams (Application p.46);
- alter the site with the construction of 8,800 feet (about 1-1/2 miles) of culverts, 25,300 feet (about 5 miles) of racetrack drainage swales, and 10 storm water detention ponds;
- involve the construction of 14 buildings totaling approximately 124,000 square feet;
- create cut slopes in the mountainous areas similar to that of an interstate highway;
- potentially require significant blasting and crushing of bedrock (300,000 to 500,000 cubic yards) to construct the project in the mountainous region;
- create additional significant wetland and wildlife impacts from required noise abatement structures (most likely, the construction of a 35-foot high wall around the entire perimeter of the site) in order to achieve the Tamworth Race Track Ordinance noise limits of 69 dBA at the property boundary;
- significantly affect the site hydrology;
- potentially contaminate the underlying Ossipee stratified drift aquifer that provides drinking water to Tamworth and several communities in the region;
- potentially degrade the quality of the nearby Bear Camp River, a National Marine Fisheries Essential Fish Habitat for Atlantic salmon;
- adversely impact sensitive wildlife species that rely upon large, unbroken tracts of forestland for survival;
- potentially destroy archeologically significant Native American artifacts;
- create year-round noise pollution;
- create increased air pollution;
- create increased light pollution;
- create significantly increased traffic;
- effect a significant diminution in property values throughout the area; and
- create a visually and aurally obtrusive and dissonant disfigurement to the landscape relative to its surrounds.

The Application says it best: “The cumulative effects of the Project in the short-term and over the long-term will be negative ...” (Application p.68). The impacts of this major project will be significant, and will permanently and adversely affect the environment, the surrounding communities, and those using the conservation and recreation lands surrounding the site for camping, hiking, fishing and swimming. Permanent impacts include deterioration of wetland quality and function, fragmentation of wildlife habitat, the generation of considerable noise pollution, light pollution and traffic congestion, and the diminution of property values in the area. Perhaps the most alarming potential impact is contamination of groundwater. The site is located directly over the Ossipee Aquifer, which is New Hampshire’s largest stratified-drift aquifer and the major source of drinking water for six towns in New Hampshire and 22 towns in Maine.

We ask that DES deny this application because it fails to meet the criteria for a permit under New Hampshire RSA Chapter 482-A and the regulations adopted pursuant thereto. Even if the incomplete and inaccurate application is amended, supplemented and resubmitted, it will still fundamentally fail to demonstrate that this project is appropriate in this location. In the alternative, we ask that DES deny this application as incomplete, and require the significant deficiencies identified herein be corrected, and the amended application be resubmitted for further review and public comment.<sup>1</sup>

Very truly yours,

Sherilyn Burnett Young

cc: Commissioner Michael Nolin, DES (w/o encl.)  
Craig Rennie, NHDES (w/o encl.)  
John Mersfelder, TCC  
David Goodson, TPB  
Michael Hicks, ACE  
Attorney Jed Callen  
Muriel Robinette, H&A  
Rick Van de Poll, Ecosystems Management  
Chris Menge, HMMH  
FOCUS:Tamworth Members

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<sup>1</sup> A table referencing the State wetland regulations addressed in our written comments is attached for your information, as well as a list of the attachments to the written comments.