Fremont Conservation Commission Comments –Dredge and Fill Wetland Application
NHDES File Number:2020-02786
Shirkin Rd, Fremont Map 5, Lot 35, Galloway Trucking

1. Galloway is setting precedence by using this site for commercial purposes. Given the presence of sensitive species and critical habitat near this facility, and the fact that this facility is the first one to be operating in the Shirkin Road commercial district, the Conservation Commission recommends that procedures and controls be implemented to inform workers, both construction and future site operation, and visitors of the sensitive ecological resources and to ensure that these resources are protected throughout the facility's operating period. The Conservation Commission recommends that these measures include installation and maintenance of signs to warn people of the presence of these sensitive species.
2. The Conservation Commission recommends that an operation, maintenance, and monitoring plan for the wetland mitigation be included in the permit requirements to ensure effective operation of the wetland mitigation measures, in particular the stormwater retention ponds.
3. The permit application states that there are no drinking water supply wells downgradient or downstream of the project site. Please note that all of Fremont uses private wells, many of which are screened in the shallow aquifer. Unless there are groundwater elevation data to demonstrate that groundwater does not flow towards nearby residences, the statement in the permit application cannot be substantiated. In addition, the site plan shows a water supply well on site.
4. Page 17 of the pdf file, functions and value assessment. At the bottom of this page, the application states that no known species will be impacted by this project. Given that Blandings turtles occur near the project site, the Conservation Commission disagrees with this statement.
5. The Conservation Commission's primary concern with this dredge and fill application and associated wetland mitigation plan is the potential for the stormwater retention ponds to release contaminants to the shallow aquifer. In order to fulfill their function of stormwater retention, it will be necessary for the ponds to extend below the surrounding grade, including the grade of the adjacent wetland. The wetland's presence suggests that the water table in this area is shallow. Thus, it is likely that there will be a limited interval between the base of the retention ponds and the shallow groundwater. The ponds will provide a place for contaminants in stormwater runoff to accumulate. With this accumulation comes the potential for contaminants to leach to the shallow groundwater, a transport pathway that will be facilitated by the likely proximity of the water table to the pond bottoms and the hydraulic gradient provided by the overlying water. Groundwater is a critical resource for the Town of Fremont: all of our residents rely on private wells for drinking water. To confirm that future facility operations do not contaminate the shallow groundwater through the retention ponds, the Conservation Commission requests that the permit applicant be required to implement and maintain a formal groundwater monitoring program throughout the duration of the facility's operation, with the details of the monitoring program to be subject to review by the Conservation Commission. At a minimum, this groundwater monitoring program should include baseline and annual sampling, and the analytical suite should include all potential contaminants associated with the facility's use. Based on proposed use of the facility for concrete and asphalt recycling, potential contaminants include polynuclear aromatic hydrocarbons, metals, total petroleum hydrocarbons, pH changes (alkalinity), and anions.
6. The Conservation Commission requests that the NHDES review using GIS and take into account the size of the aquifer that is partially on the Galloway property and the transmissivity and water table data of this aquifer. The Conservation Commission also requests that the Water Well Board is contacted to determine how many wells in the area use this aquifer.

Respectfully submitted on behalf of the Fremont Conservation Commission,