

Town of Chichester
Board of Selectmen
54 Main Street
Chichester, NH 03258

Town of Epsom
Board of Selectmen
PO Box 10
Epsom, NH 03234

August 27, 2010

RE: Meeting with Governor Lynch
Suncook River Stabilization &
Buck Street Dam Removal

Dear Honorable Governor Lynch;

The Towns of Epsom and Chichester appreciate the efforts being taken by you and the NH Department of Environmental Services (NHDES) for seeking funding to stabilize the Suncook River through our towns. Based upon proposed action plan, the only guarantee of funding remains with the recent grant award for engineering and environmental permitting. All other capital funding remains under Legislative authority and is at this point, not guaranteed to be available, nor will be available for an additional year or more. This remains a major concern to the towns along the Suncook River.

The impacts caused by the natural disaster to our communities have been taking its toll on our infrastructure and livelihood for the river residences, farms and business since the river avulsion occurred in May of 2006. We are in need of State and Federal assistance to address this post ecological disaster. The ability of the local communities to address the stabilization and floodway restoration through local funds are virtually impossible. Each community continually struggles to address the basic needs of our communities as the Legislative and Executive Branch of State government transfer more and more of the costs to the local jurisdiction. We cannot afford to raise the necessary funds to address the river stabilization, nor can we afford to not take appropriate action for the protection of our communities.

The event in 2006 along the Suncook River was an unprecedented event, as well as, the flood events in 2007 and 2008. The only other comparative modern disaster in this State was the October 2005 Alstead flood event. As part of the Alstead response, the State of New Hampshire took immediate action to assist the community in dealing with short-term stabilizations and long-term restoration of the river and roadway infrastructure at costs to the State exceeding millions and millions of dollars. Why is the Suncook River less important? Is it because the direct impact did not result in loss of state and local highway systems? Is it because the immediate impact did not result in loss of residential or commercial structures? The State's action for the Suncook River avulsion to date has been to assist each town in applying for competitive "grant" funding. The only successes have been an "out-of-date" engineering and environmental study lead by the town of Epsom (\$16,000 local match), a USGS sediment study that is not yet released and limited FEMA buyout program in Allenstown with State assisted match. The State's short-term action to date has been wholly ineffective to address the Suncook River long-term issues and has shoulder the burden to the local communities.

The recent action plan laid out by NHDES is to seek limited river stabilization by addressing the "head-cutting" with the construction of rock or concrete vanes at the avulsion site

and upstream to be maintained by property owners and the removal of the State owned Buck Street dams. This overall plan falls too short for addressing the full river stabilization needs. Without further critical floodway restoration and floodplain protection as outlined by the Vanasses Hangen Brustlin, Inc study to include downstream dredging for sediment laden floodways, the towns will continue to experience the extreme flood conditions even under lower storm events. We will continue to experience reoccurring property damages and loss along the river. The reoccurring flood damage will most likely result in an increase cost for the local properties as they seek updated insurance policies through the FEMA insurance program.

A key part of the State's plan to stabilize the Suncook River is NHDES desire to remove the State owned, Old Buck Street dam located just north of the NH Rte 28 bridge over the Suncook River at the border of Allenstown and Pembroke. Staff from NHDES's Dam Bureau (Water Division) had attend past Board of Selectmen's meeting in Allenstown, Pembroke and Epsom to discuss the State's desire to complete studies for the removal of the State owned dams. At that time, no town had fully endorsed this action. It was understood that further studies would be undertaken to ensure the decision for removal of the dam is appropriate and supported. As a result of our past experiences along this river corridor, we have a greater awareness of the need for a comprehensive environmental assessment to be completed "before" the official decision is made for the removal of the dam.

As you know, the downstream movement of sediment is a natural process of erosion and depositions that dictates the physical characteristics of a river, stream and floodplain. The geomorphology, or physical nature, of a river system is a delicate balance and has a direct correlation to the livelihood of different fish and wildlife habitat. Any potential river adjustment, as experienced with the river avulsion, could have a direct impact to the river's physical characteristics, could create incompatibility with the natural sediment transport and/or result in a direct failure of the system's geomorphology. As such, the towns along this river are concerned as to the physical nature affect on the river caused by the removal of the Old Buck Street dams without a "cause and affect" environmental assessment. As explained by NHDES staff from the Dam Bureau at the Selectmen's joint meeting held in Epsom, the State's action plan would be to remove the dam and "wait and see" how the river reacts to the change. This approach is NOT acceptable to the Towns.

NHDES needs to fully evaluate the social, cultural and environmental impacts for the river system as a result of the dam removal. The following ecological impacts, although not inclusive, need to be fully assessed before the removal action is taken:

- A full fluvial geomorphology river assessment to determine if removal of dams will cause streambed destabilization, head-cutting and stream habitat losses;
- Assessment of stream channel stabilization using the guidance provided by the University of New Hampshire (New Hampshire Stream Crossing Guidelines, May 2009) and the Rosgen Stream Channel Classification System;
- Evaluation of upstream loss of bogs and wetlands and assessment of irreparable damage (losses) caused by the lower river levels;
- Evaluation of wildlife impacts caused by the loss of wetlands and impacts to perennial streams due to the lower river levels;
- Evaluation of impacts to any protected species and wildlife habitats that depend upon the backwater caused by the dam;

- Assessment of aquatic life within the river system to evaluate the impacts to benthic invertebrates and fish species within their in-stream habitats, upland areas, wetlands and adjacent surface waters;
- Hydraulic evaluation for “pre vs. post” normal high water level and flood conditions under full bank discharge with particular emphasis for impacts to bank erosion and stability of roadway structures and bridges. Increase in river velocity during storm events can cause erosion along river banks and around piers and abutments resulting in potential foundation destabilization and potential river scouring;
- In-depth river corridor assessment of the “pre vs. post” for sediment transport and ice movements through the river system to ensure the dam removal does not adversely affect the channel stability or alter the sediment transport competence;
- Short term and long term bank fluvial erosion hazard zones under the impact of 10-year, 25-year, 50-year, 100-year and 500-year storm events;
- Evaluation of FEMA flood conditions for 10-year, 25-year, 50-year, 100-year and 500-year storm events and comparison to current maps adopted by the local communities;
- Re-assessment of community’s floodplain mappings and coordination through FEMA for map revisions;
- Commitment of financial reimbursement to local communities for application costs to FEMA for map revision requests and map reprinting;
- Assessment of the property values in the “pre vs. post” river condition;
- Impact to private ground and artesian water supply (wells) caused by lower river elevation and reduced groundwater levels;
- Loss of recreational river use for swimming, kayaking, canoeing, boating, fishing, camping, and public beaches;
- Identification of compensatory mitigation for loss of jurisdictional wetlands due to removal of water impoundment behind the dams; and
- Full assessment of construction sequence for dam removal and evaluation of “best management practices” that will be employed for the dam removal to ensure water quality protection can be maintained within the same strict compliance of State’s regulatory controls as imposed upon the towns for similar actions (no waivers).

In conclusion, we request the State to complete a comprehensive river corridor restoration overview, a full environmental assessment for the dam removal at Old Buck Street and commit to full funding to address the entire river stabilization and floodplain restoration similar to the effort taken in Alstead. Completing only a small portion of the stabilization efforts and taking a “wait and see” approach should not be the plan of action to be supported by the State of New Hampshire as it does not fully serve the needs of the town’s residents, landowners and environmental communities (fish and wildlife habitat).

We are confident that we can work cooperatively with you, the Legislature and the State Agencies to fully address the long-term needs along the Suncook River corridor. Thank you for your recent efforts and support.

Respectfully Submitted by Board of Selectmen,

Towns of Chichester and Epsom