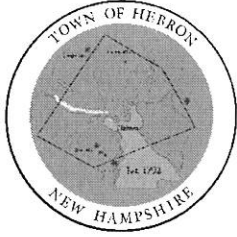


These minutes may be amended at a future hearing. Any changes will be included in the minutes of that meeting.



**Town of Hebron**  
PO Box 188  
Hebron, NH 03241  
Phone: 603-744-2631  
[clerk@hebronnh.org](mailto:clerk@hebronnh.org)

**Hebron Planning Board**  
Minutes of Meeting  
March 2, 2022

**Planning Board Members Present:** Ivan Quinchia (Chair); Chuck Beno (Vice Chair); Karl Braconier (Member); Larry Goodman (Member); John Sheehan; (Alternate); Roger Larochelle (Alternate), Carol Bears (Secretary). Richard James; Select Board

**Absent:** Patrick Moriarty (Select Board Representative),

**Others Present:** See attached sign in sheet.

**Time Convened:** 7:01 p.m.      **Time Adjourned:** 10:28 p.m.      **Next Meeting:** April 6, 2022

**Agenda:**

1. Approval of the minutes of February 2, 2022 meeting
2. Continuation of the hearing for the Application for Site Plan Review for Newfound Serenity RV Park to be located on Matthews Lane, Hebron, NH 03241 Tax Map #24 Lot #25-1. The purpose of the application is for a seasonal RV Park with full hookups containing nine (9) sites.
3. Administrative Matters and Announcements

Chairman Ivan Quinchia called the meeting to order at 7:01 PM. The meeting is a continuation of the February 2, 2022 meeting.

The minutes were reviewed, Larry Goodman had three minor changes presented. A motion was made by Chuck Beno to approve the minutes with the changes and seconded by Larry Goodman. The vote was in the affirmative with everyone voting in favor.

Ivan outlined how the meeting would go. Anybody that didn't have a chance to speak at the February 2, 2022 meeting would be heard first after Mr. Spaulding had a chance to continue his presentation on the Site Review of his property. Mr. Spaulding wanted to be able to address some of the concerns addressed by some of the attendees at the last meeting. Giving an example of Barbara Kelly's comment on being concerned about abutters wells being contaminated in the event of a flood on their property.

Ivan clarified a couple of things that Mr. Spaulding said in the letter to Planning Board. All the individuals that are in the room have a right to their opinions and they are all concerned for the community that they live and we all have the right to raise issues that they have. Ivan also strongly emphasized that the comments in the letter regarding the October 6, 2021 conceptual plan review, as well as the comments regarding Travis Austin personally, were unprofessional

These minutes may be amended at a future hearing. Any changes will be included in the minutes of that meeting.

and unjustified. Mr. Austin was thoughtful, respectful and well within his rights at the time to organize meetings with as many taxpayers as he wished and were willing to meet with him.

Patrick Moriarty stood up and recused himself from his role on the Planning Board after he saw a copy of the complaint letter that was sent by Mr. Spaulding. He took exception to the comments made about him in the letter as well as the letter's remarks regarding Roger & Karl. He felt his review of the plan was what were the risks and rewards to the Town of Hebron. He felt there was more risks to the town than rewards and it was his job to protect the town and its people. On the advice of the Town Attorney, he recused himself from participating in further discussions of this matter.

Ivan appointed Richard James as the Select Board Representative to Planning Board in Patrick Moriarty place.

Jill Griffith from Gomez and Sullivan Engineers has 14 years of experience in hydrologic and hydrology to conduct studies on the FEMA flooding areas. She indicated that FEMA no longer uses the 100-year flood as a guideline in predicting major flooding. She indicated that most floods happen in the spring and fall, with just a small percentage of flooding happening in the season that the RV park would be operating. She also felt that with all the alert systems that everyone has today, there would be enough time to evacuate the area. The new FEMA maps show that the flooding in this area covers more land than the previous maps. Ivan asked Ms. Griffith as to why her firm omitted the last 10 years of flood data from their proposal. She indicated that it was to protect the abutters in the previous hearing.

Ivan asked Mr. Spaulding what the percolation rate was and if it was considered high relative to percolation rates in New Hampshire. Mr. Spaulding replied that it was extremely high especially relative to New Hampshire.

Ivan asked what the water table depth was on this property. Mr. Spaulding indicated that it was 40 inches on average.

Mr. Spaulding, realizing that you are on a private road, at some point someone in the RV Park will need emergency services, if the project was approved, was he prepared to give the Town of Hebron a waiver release of liability. No answer was given and he said he didn't know.

Mr. Spaulding, anticipating nine RV's, nine hauling vehicles and perhaps as many as two additional vehicles per site, what contingency plans are you envisioning to protect adjacent wells and the river from contamination due to a fuel spill or a septic system failure? What sort of liability coverage can we expect and would New Found Serenity Park LLC be prepared to float a bond to cover potential contamination and clean up? Or loss of use of the neighboring properties? His reply was he wasn't prepared to answer the question and his attorney said they would look into it.

Mr. Spaulding talked about the original sub-division and in his deed, it gives him permission to remove fill from the other lots to raise a one-acre parcel by 3 to 4 feet and would need to make

These minutes may be amended at a future hearing. Any changes will be included in the minutes of that meeting.

sure, that the owners were satisfied with how the lots were left. That is a lot of material that would need to be moved to the lot.

Ms. Petersen asked if the owners would be financially responsible and if they would have any liability since the RV Park, is an LLC. Mr. Spaulding's attorney replied that it was exactly the reason why an LLC was created, to protect the owners from any liability. There was a question about the liability to town if they responded to an emergency and there was fuel spill that contaminated wells on another owner's property, who would be responsible. It would be the responsibility of the Newfound Serenity LLC to make this good. The Spaulding family are owners of the LLC but they would not be personally held responsible for this. The LLC should have insurance to cover this.

There was discussion about the number of vehicles that could be present in the RV park. There would be trailer, the tow vehicle and possibly on additional car on each lot. There is also an area where there is parking for three additional cars for visitors. There is a possibility of 30 cars accessing the property. Mr. Spaulding feels that most of the units will be the towable travel trailers including 5<sup>th</sup> wheels, Folding Campers and Truck trailers. He envisions that most of the motor homes will be the smaller units with possibility of a few of the larger homes. **Exhibit A** shows the sales of RV's over the past two years.

Ivan Quinchia asked what would happen or what would be the plan or contingency plan if one or more of your campers' rents for the season and are absent during an emergency or flash flood. He answered that had a trailer hitch on his truck and he could do it and would have to investigate where he could stage the RV's. He is working on an evacuation plan and will find where the trailers can be moved until the water recedes. **Exhibit B** is a draft of this Emergency Operation Plan Outline.

He talked about having the flexibility to manage the business the way it needs to be. If he has only one trailer is there really need to a full-time manager on the property all the time. He plans to have cameras installed around the RV park.

Attached is **Exhibit C** which is a response from Mr. Spaulding on the concerns offered at the February meeting from the Hebron Conservation Commission.

Stacy Darlington had a couple of comments. One was the application provided examples where it compares itself to a fixed structure setup, supporting the hospitality industries such a small house rentals and Airbnb's. The concern is that the average trailer could hold five people multiply that by the 9 sites, could possibly be 45 individuals when the park is full. Which would indicate that an Airbnb would have to have at least 22 rooms of which is allowed under the Hebron Zoning Laws. See **Exhibit D**.

Mrs. Darlington also mentioned that his application did not mention putting any toilet facilities on the site. The proposed site does not adhere to State of New Hampshire Campground Regulations RSA Title 19 Chapter 26.

These minutes may be amended at a future hearing. Any changes will be included in the minutes of that meeting.

Martha Twombly presented the board with a letter from the Hebron Conservation Commission outlining concerns regarding the new FEMA maps that have updated the flood hazard data for the property in question. In the light of the time, she just wanted to present to you the new information and the long-term effects of the area. It was recommended that a site walk be done along with the town getting an engineer study done. See **Exhibit E**.

Ms. Petersen presented her concerns as a property owner on the corner of Matthews Lane and is concerned about the addition traffic on a private road. Please refer to **Exhibit F** for her concerns on this matter.

Ivan closed the meeting for comments from the public so the Board would have to comment. Chuck Beno made a motion to close the meeting to comments, it was seconded by Larry Goodman. The vote was in the affirmative.

Comments from around the table included that the project appears to be very unpopular and the boards work need to be objective to the Zoning Regulations for the town. There was much concern for the flooding in the area as many have seen who the Town is impacted by the floods. There was concern about the character of the neighborhood and meeting other zoning specifications. It was commented that the Board needed to do more homework. There was discussion on the 20,000 sq ft per site and if that included land that was considered not useable because of the area near the river. The thought that is would include just the usable portion of the land. One comment that it failed to meet our regulations for campgrounds.

Another comment that that we had a great deal of detail this evening and the right to develop one's property is important. We have heard a lot about esthetic and we are trying to be as objective as possible. It goes beyond one's right to use a property and develop it because it has a bearing on everybody. We've heard nothing about the NH Comprehensive Shoreline Protection Act from 250 feet from the river. There are special conditions for that although they are not proposing development in the area. When you look at the master plan about the suitability of land for development, thus preserving the natural beauty of open spaces to visitors. There is a lot of concern about and as a planning board we need to look at all of these and whatever action is taken, it needs to be grounded and objective.

The meeting will be extended to our next regular scheduled meeting which would be April 6, 2022 at 7:00 PM. There will be a site visit scheduled and will be posted so everyone would be able to attend.

Richard James abstained from all votes as he had not been appointed to the Planning Board by the Select Board.

This time a motion was made by Karl Braconier to adjourn the meeting, seconded by Chuck Beno and the vote was in the affirmative. The meeting ended at 10:28 PM.

Respectfully Submitted:

Carol A. Bears, Secretary



Sign In Sheet  
Planning Board  
3-2-22

DIG & JOYCE COWERN

\* STACEY DARLINGTON

\* DAVID DARLINGTON

Caley Shepherd

Dale & Wendy Spaulding

\* NEE PETERSEN

Muttie Sheehan

\* Barbara Kelly

Scott Davis

Suzanne Smith

Lorne Roughton

Mark Roughton

Roya LaFontaine

Janet & Bob Skisniowski

Dan Fuhr

Allison Ford

Martha Twombly

Mark Coulson

Jan Connor

Travis Austin

Solveig Wolstenholme - like to speak Heb Cons Comm.

Wayne Mahan

Dorothy Mahan

Joyce Lakey

Sign in

Suzanne Appleton     Herbat Hill

Barbara Kohant,     Brooks Cur

Fred Kohant,     Brooks Cur

Phyllis Rockwell

Jill Griffans, GAMES ON

Susan Conley

Sue Shackley

# Exhibit A

## Wholesale RV Shipments

	DEC 2020	DEC 2021	YOY Last Year	YTD 2020	YTD 2021	YOY To Date	% of Total 2021 RV Shipments
<u>Towables</u>							
Travel Trailers (ALL)	28,047	28,550	1.8%	298,478	423,775	42.0%	70.6%
Travel Trailers - 5th Wheel	7,670	7,213	-6.0%	81,508	107,566	32.0%	17.9%
Folding Camping Trailers	516	652	26.4%	6,255	7,885	26.1%	1.3%
Truck Campers	271	493	81.9%	3,372	4,802	42.4%	0.8%
<b>All Towable RVs</b>	<b>36,504</b>	<b>36,908</b>	<b>1.1%</b>	<b>389,613</b>	<b>544,028</b>	<b>39.6%</b>	<b>90.6%</b>
<u>Motorhomes</u>							
Conventional (Type A)	1,062	901	-15.2%	11,892	15,350	29.1%	2.6%
Van Campers (Type B)	796	912	14.6%	7,222	13,827	91.5%	2.3%
Mini (Type C)	2,020	1,626	-19.5%	21,685	27,035	24.7%	4.5%
<b>All Motorhomes</b>	<b>3,878</b>	<b>3,439</b>	<b>-11.3%</b>	<b>40,799</b>	<b>56,212</b>	<b>37.8%</b>	<b>9.4%</b>
<b>Total RV Shipments</b>	<b>40,382</b>	<b>40,347</b>	<b>-0.1%</b>	<b>430,412</b>	<b>600,240</b>	<b>39.5%</b>	<b>100.0%</b>

Source: [www.rvia.org](http://www.rvia.org)

**Newfound Serenity RV Park  
Draft Emergency Operations Plan Outline**

March 2, 2022

- RV Park Management contact information
- 911 and Hebron Fire Department Contact Information
- Emergency Exit Plan/Evacuation Route (Written Description and Plan)
  - Coordinate/determine off-site evacuation location with the Hebron Fire Department
- Campground Manager responsibilities:
  - Provide each guest/party upon check-in with an orientation of the property, including the river front and the inherent risks.
  - Inform each guest of the impending disaster. Notice shall be verbal if possible or else by public address.
  - Understand any special needs for fragile, handicapped, elderly or disabled individuals within the facility and aid where possible.
  - Prior to any evacuation, all electrical and water hookups will be disconnected and sewer hookups will be sealed.
  - All lot holders, families and guests should have their own personal emergency evacuation plans known to each member of the family and any guest(s) on site visiting lot holders.
- Provide a checklist for a personal emergency plan:
  - Find out which disasters are most likely to occur in the areas you are visiting.
  - Know how to prepare for each disaster and how you would be warned of an emergency.
  - Learn about the community's warning signals: what they sound like and what you should do when you hear them.
  - Learn the park's main evacuation routes.
  - If needed, ask about special assistance for elderly or disabled persons.
- Fire Prevention and Safety Tips
  - Identify location of on-site fire extinguishing equipment

- Flood

- We understand the flooding characteristics of our property.
- Identify the evacuation route.
- Monitor FEMA Severe Weather Alerts. Upon the issuance of a Flash Flood

Warning for Grafton County:

- The RV Park Manager will inspect the frontage along the Cockermouth River and instruct all parties to return to their RVs.
- The RV Park Manager will notify each site of the Flash Flood Warning and provide updates until it has been lifted.
- The RV Park Manager will install a barrier across the access path to the river with appropriate signage.
- Monitor the storm. If a severe flood is expected (greater than a 100-year event), evacuate all RVs to higher ground.
- When the Flash Flood Warning has lapsed, inspect the river for safety, and if appropriate, remove the path barrier and inform all parties.



Exhibit B

March 2, 2022

***Hand Delivered at Public Hearing***

Mr. Ivan Quinchia  
Chairman, Planning Board  
Town of Hebron, NH  
7 School Street  
PO Box 188  
Hebron, NH 03241

**Subject:        Newfound Serenity RV Park  
                  Response to Hebron Conservation Commission Letter - January 31, 2022**

Dear Chairman Quinchia and Board Members:

At my request, Carol Bears provided a copy of the attached Hebron Conservation Commission letter to the Planning Board, dated January 31, 2022. The content of the letter is similar to comments made by Conservation Commission members at the February 2, 2022 Public Hearing on our Site Plan Application. They note that our proposal was reviewed at their regular meeting on January 19, 2022.

We assume their comments were made upon materials provided for our Site Plan Application, which were submitted to the Town on January 12, 2022.

Their comments are restated below with our response provided in italics.

1. The HCC strongly recommends that the Town hire an independent engineer/hydrologist to review the hydrologic study and modeling of the flood potential on this site, and the stormwater and erosion control plans.

*Section D. 5. Flood Hazard Areas of the Town of Hebron Site Plan Regulations states: "The Board may require Base Flood Elevation (BFE) data (i.e. floodplain boundary and 100-year flood elevation) as determined by a Licensed Land Surveyor or Civil Engineer." Newfound Serenity LLC retained the services of Gomez and Sullivan Engineers, a nationally recognized expert in hydrologic and hydraulic studies (including FEMA Flood Insurance Studies), to determine the Base Flood Elevation for a 1% annual event and a 1% seasonal event on our property. They were retained proactively by Newfound Serenity LLC to gain a complete understanding of the flood boundary, depth, velocities and probability. Importantly, the results were utilized to inform our submitted design to ensure its compliance with the requirements of the Floodplain District of the Zoning Ordinance. Gomez and Sullivan's work was performed under the supervision of their professional engineers.*

*As it relates to the stormwater and erosion control plans, design plans, details and the Design Narrative were submitted to portray and explain these elements. I look forward to making that presentation and responding to your questions at the Public Hearing on March 2<sup>nd</sup>.*

- a. The HCC is concerned the FEMA data is out of date and does not reflect runoff in the Cockermouth River sub-watershed accurately, especially considering repeated flooding events that have occurred since the 2006 Mother's Day flood. These have all have exceeded expectations.

*The Gomez and Sullivan Hydrologic & Hydraulic Analysis (as submitted as part of the Site Plan Application) provides an updated flood study for the Cockermouth River in Hebron that considered various sources of historic and recent flooding data. As described in the report, after a review of available data, the hydrologic data (i.e., flood flows) recently developed for the FEMA-approved 2019 Letter of Map Revision (LOMR) for the Town of Hebron were used for the analysis. Additionally, Gomez and Sullivan is aware of the Preliminary Flood Insurance Study (FIS) issued for Grafton County in December 2021. Consistent with Gomez and Sullivan's study, the Preliminary FIS depicts a significantly larger floodplain for the Cockermouth River in the portion of Hebron currently mapped as Zone A (including the subject property). The differences between the extents of the 1% annual exceedance probability (AEP) (i.e., 100-year) flood event in the Preliminary FIS and Gomez and Sullivan's study are minor and likely attributable to differences in the digital elevation model (e.g., LiDAR and/or other topography sources) used for inundation mapping.*

*The Preliminary FIS was conducted recently and could reasonably be considered as the independent hydrologic/hydraulic analysis recommended by the Conservation Commission. Gomez and Sullivan has submitted an inquiry to FEMA to confirm the hydrologic and hydraulic engineering methods used for the Preliminary FIS within the Town of Hebron.*

- b. The Newfound watershed is very prone to flash floods: very steep slopes make runoff immediate and high velocity. Newfound Lake and the Cockermouth River experience some of the fastest rising rates in the state following precipitation events.

*The Gomez and Sullivan Hydrologic & Hydraulic Analysis takes into account the topography of the contributing drainage area as indicated in Section 2.3 Hydraulic Analysis (Page 5) of their submitted report. The hydrologic method was based on USGS streamflow gage data, which reflects recent precipitation and flooding events, as well as regional regression equations, which incorporate basin slope. The hydraulic model was developed from recently collected LiDAR elevation data.*

*Regarding flood velocities, the Gomez and Sullivan study found that velocities on the subject property during the 1% AEP (100-year) flood event ranged from 1 to 2 feet per second, which are not expected to cause any significant damage or erosion.*

*Additionally, the proposed RV park area is somewhat protected from direct, high-velocity flooding from upstream due to a natural rise of land that runs parallel to and just upstream of the west property boundary (just east of Matthews Lane up to and including the fill for the Wheaton residence). This berm-like land feature lies at an elevation of about 620 feet NAVD88, approximately 5 feet higher than the upstream 1% AEP flood elevation of 615 feet NAVD88.*

2. We question the integrity and safety of the sewer (gravity lines) and water infrastructure (purifiers/filtration systems?) in this proposal, considering the flood risk.

*The sewer design was completed by a NHDES Licensed Designer having full knowledge of the flood potential. The design was submitted to, reviewed and approved by NHDES with their full knowledge of the flood potential.*

*All elements of the water system have been designed to eliminate the potential for contamination by any flood waters. The well cap, frost free hydrants outlets, and water system controls have all been designed for installation above the 1% annual base flood elevation. This is all as indicated on the submitted Site Plans.*

3. Will the “community well” affect abutters’ wells? Is the development large enough to require a “public water supply?”

*Although the proposed well will serve 9 seasonal RV sites, the water demand from this development is comparable to a four bedroom single family home. The expected demand from the proposed well only requires a 75’ protective radius (which signifies the limits of the effect from drawdown). There are no other wells within 150 feet of the proposed well location.*

*The proposed well is not considered a “public water supply.” Please see the attached email dated 12/9/21 from Thomas Willis, Jr., PE, NHDES Small Systems Engineering and Design Review.*

4. This part of the Cockermouth is significant Wood Turtle habitat (NH State Listed Species of Concern), and human impacts to nesting areas would likely be negative.

*Newfound Serenity notes the following:*

- *We spoke with Josh Megyesy at NHDES (who specializes in Wood Turtles) and discussed the following notes/responses.*
- *Wood Turtles can be found throughout the state and thus our property is not unique for their survival. We do not know if they are present on our property. We do understand that a survey was completed by NHDES approximately five years ago and this area of the Cockermouth is important.*
- *Our development will not pose any conservation threats as there will be no habit loss or fragmentation or stream alteration. We are not developing or improving any portion of the river front.*
- *We will install “Stay on Trail” signs to minimize disturbance.*

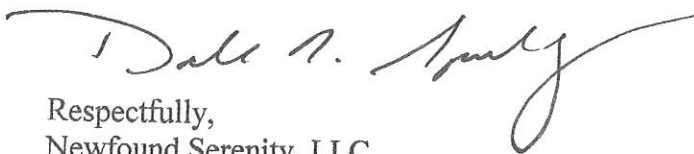
- *Additionally, near the sand bar, we will install signs within 15 feet of the water's edge to "Keep of the Grass" (or similar). We understand in speaking with NHDES that the turtle nesting tends to be on higher grounds less susceptible to inundation while still adjacent to the water's edge.*
  - *We will add to the Park Rules the prohibition of collecting turtles or wildlife.*
  - *The Park Rules and check-in orientation will emphasize the importance of staying on our property. This will inhibit tenants "wandering" up and downstream off the property to other areas that may also foster turtles.*
5. The plans show no development, grading, landscaping, perched beaches, etc. at the Cockermouth River, but some would be needed due to the steep banks at the river. "Existing beaches" is a misleading term. We recommend that the owner detail all work that will be done in the 50' buffer to the Cockermouth River, and will be subject to the conditions of a Wetland Permit with NH DES.

*There will be no development along the Cockermouth River and we disagree that some will be needed. This would not be consistent with our environmentally conscious approach to the project. There is an existing pathway to the river's edge that will be maintained. We intend to leave the woodland area and the river front in a very natural condition. We can re-label "Existing Beaches" to any nomenclature deemed appropriate by the Conservation Commission. We will install a split-rail fence for approximately 75 feet (or other natural type fencing) along the bank portion with a "Stay Away" sign for the purpose of improving safety as well as minimizing disturbances. The location and type of fencing will be added to the Site Plan submittal. The fencing will be installed utilizing hand tools which is compliant with the Shoreland Water Quality Protection Act and will not require a Wetlands Permit.*

6. Regarding public safety, the HCC has concerns about traffic safety implications for large campers entering onto Groton Road from Matthews Lane, where there is short sight distances in both directions.

*The project has received a NHDOT Driveway Permit for an RV Park up to 10 sites (which is consistent with our application). The NHDOT considers safety, traffic, speed, geometry, widths, sight distance, etc. in the issuance of a driveway permit. The permit was issued with no conditions or improvement requirements to the existing intersection.*

Please contact me at 603-496-8890 or [dale\\_spaulding@comcast.net](mailto:dale_spaulding@comcast.net) if you have any questions or require additional information.



Respectfully,  
Newfound Serenity, LLC  
Dale R. Spaulding, Manager

cc: Daniel P. Luker, Preti Flaherty – Counsel to Newfound Serenity, LLC



Thomas Willis <thomas.h.willis@des.nh.gov>

12/9/2021 1:29 PM

## RE: Water Supply for Small RV Park

To Dale Spaulding <dale\_spaulding@comcast.net> Copy Bruce Fillmore <fbfillmore@gsinet.net>

Dale:

You have done your homework!! If you are developing a 9-site RV park (9 sites only!), this is not a public water system per RSA 485-1a, XV. We consider, though, campsite occupancy at 2.5 persons per site as many families with children camp/RV. The only way we would consider a reduction to the 1.5 persons per site, is if it were a bonafide 55-YOA and older facility. So we consider your capacity as being 22.5 (22 persons), which is less than the 25 you correctly cited below. If you grow beyond that, then you are considered a PWS. Since you would be open 22 +/- weeks a year, and presumably would drain the system (depth of water main above 5 feet below ground surface), then by definition, you would be considered a transient, non-community water system. This category has the least regulatory requirements.

So in summary, with less than 10 campsites, you are a private water system, 10 or more, we would have to go through the registration process.

Let me know if you have additional questions.

Best:

//Tom//

Thomas H. Willis, Jr., PE

Small Systems Engineering and Design Review

New Hampshire Department of Environmental Services/Drinking Water and Groundwater Bureau  
222 International Drive, Suite 175 / Portsmouth, NH 03801 //P: (603)271.2953 / C: (603)923.9593

E-mail: [Thomas.H.Willis@des.nh.gov](mailto:Thomas.H.Willis@des.nh.gov)

**From:** Dale Spaulding <dale\_spaulding@comcast.net>

**Sent:** Wednesday, December 08, 2021 2:35 PM

**To:** Willis, Thomas <thomas.willis@des.nh.gov>

**Cc:** Bruce Fillmore <fbfillmore@gsinet.net>

**Subject:** Water Supply for Small RV Park

**EXTERNAL: Do not open attachments or click on links unless you recognize and trust the sender.**

Good afternoon Tom,

My name is Dale Spaulding and I am in the process of developing a 9-site RV Park in Hebron under my business name Newfound Serenity LLC. I am also a NH PE and my septic designer Bruce Fillmore is also cc'd.



We recently made the Subdivision Application and the reviewer comment was to verify Water Supply Permit status. For your reference the Work # is 202107211 and we have attached the plan submission.

A few facts:

- All nine sites will have full hookups. W/S/E.
- The water supply will be used exclusively for the nine sites.
- It is a Seasonal Park, open for 22-23 weeks per year.
- RV sites only. No tents.
- On site well and septic.

From my understanding of the regulations, the proposed well does not require a water supply permit as,

1. It will have fewer than 15 service connections, and
2. It would on average regularly serve fewer than 25 individuals daily at least 60 days out of the year. From Env-DW 405.02, using 1.5 people per unit x 9 units results in 14 people.

An additional consideration being, that from the National RV Parks and Campgrounds 2019 Industry Trends and Insights Report, the average occupancy for parks with full hookups was 69%. See attached. I am seeking your confirmation that a permit is not required so that I may forward your response to the reviewer. If you require additional information to make a determination one way or the other, please ask and we will respond immediately.

Thank you,  
Dale Spaulding  
603-496-8890

Pollutant Removal Efficiencies for Best Management Practices for Use in Pollutant Loading Analysis				Values Accepted for Loading Analyses		
BMP Type	BMP	Notes	Lit. Ref.	TSS	TN	TP
Stormwater Ponds	Wet Pond		B, F	70%	35%	45%
	Wet Extended Detention Pond		A, B	80%	55%	68%
	Micropool Extended Detention Pond	TBA				
	Multiple Pond System	TBA				
	Pocket Pond	TBA				
Stormwater Wetlands	Shallow Wetland		A, B, F, I	80%	55%	45%
	Extended Detention Wetland		A, B, F, I	80%	55%	45%
	Pond/Wetland System	TBA				
	Gravel Wetland		H	95%	85%	64%
Infiltration Practices	Infiltration Trench ( $\geq 75$ ft from surface water)		B, D, I	90%	55%	60%
	Infiltration Trench ( $< 75$ ft from surface water)		B, D, I	90%	10%	60%
	Infiltration Basin ( $\geq 75$ ft from surface water)		A, F, B, D, I	90%	60%	65%
	Infiltration Basin ( $< 75$ ft from surface water)		A, F, B, D, I	90%	10%	65%
	Dry Wells			90%	55%	60%
	Drip Edges			90%	55%	60%
Filtering Practices	Aboveground or Underground Sand Filter that infiltrates WQV ( $\geq 75$ ft from surface water)		A, F, B, D, I	90%	60%	65%
	Aboveground or Underground Sand Filter that infiltrates WQV ( $< 75$ ft from surface water)		A, F, B, D, I	90%	10%	65%
	Aboveground or Underground Sand Filter with underdrain		A, I, F, G, H	85%	10%	45%
	Tree Box Filter	TBA				
	Bioretention System		I, G, H	90%	65%	65%
	Permeable Pavement that infiltrates WQV ( $\geq 75$ ft from surface water)		A, F, B, D, I	90%	60%	65%
	Permeable Pavement that infiltrates WQV ( $< 75$ ft from surface water)		A, F, B, D, I	90%	10%	65%
	Permeable Pavement with underdrain		Use TN and TP values for sand filter w/ underdrain and outlet pipe	90%	10%	45%

Pollutant Removal Efficiencies for Best Management Practices for Use in Pollutant Loading Analysis				Values Accepted for Loading Analyses		
BMP Type	BMP	Notes	Lit. Ref.	TSS	TN	TP
Treatment Swales	Flow Through Treatment Swale	TBA				
Vegetated Buffers	Vegetated Buffers		A, B, I	73%	40%	45%
Pre-Treatment Practices	Sediment Forebay	TBA				
	Vegetated Filter Strip		A, B, I	73%	40%	45%
	Vegetated Swale		A, B, C, F, H, I	65%	20%	25%
	Flow-Through Device - Hydrodynamic Separator		A, B, G, H	35%	10%	5%
	Flow-Through Device - ADS Underground Multichamber Water Quality Unit (WQU)		G, H	72%	10%	9%
	Other Flow-Through Devices	TBA				
	Off-line Deep Sump Catch Basin		J, K, L, M	15%	5%	5%



# Exhibit D

TO: Hebron New Hampshire Planning Board

Subject: Site Plan Review, Newfound Serenity RV Park

Sir/Madam,

## Impacts to abutter Darlington Property

- As noted in the RV park application under "Boundary Plan: Tax map 24 Lot 25-1"
  - "Significant erosion is evident along the Cockermouth River as compared to record plans and deeds"
- This erosion is a direct result of flooding. The USGS chart of the Cockermouth River contains 10+ years of data, showing the gage height variations of the river. Evidenced is the frequency and height change consistently throughout the years.
- Satellite image #1, shows the Darlington property, and the Cockermouth River from the bridge in Groton, past the RV park property. Clearly displayed is the erosion of the river as shown by the amount of sandy river edge areas. Resulting in a delicate eco system in these areas.
- Satellite image #2, shows a close up of the River specific to the Hebron side of the Darlington property. Shows a rather deep swimming hole which contains hidden dangers, as it is full of submerged tree and branch debris that has been swept downstream. Also shows extensive sandy beach erosion areas that extend up river to another smaller swimming hole. Making the Darlington side very attractive areas for play and recreation.
- Ease of access across the river to the Darlington side from the RV park is shown in Photo #1 where footprints are clearly seen crossing the river. Photo taken from the Darlington sandy beach erosion area directly across to the RV park. This section of the river runs shallow during the river's consistent operational level.
- Risks to Darlington property:
  - Trespassing; Damage to property caused by high velocity people use of, chairs, coolers, campfires on the beach, etc.
  - Trash
  - Theft – free firewood
  - Risk of injury; Risk of drowning (personal injury, wrongful death lawsuits)
- Risk analysis of people impact: taken from the RV park application example of average of 5 people per RV site (5x9 sites) = 45 people daily, times the number of days open 175 +/- = 7,875 total people days across the annual season.
- Additionally, as responsible property owners, risk analysis continues against the possible expansion of the RV park. Noting that no data has been submitted for this expansion, used the existing examples provided in this application, and potential land available, the resulting calculations will be taken into consideration, as we continue to explore what legal avenues we have available to us for protection of our property.

### High Risk Increased Damage to the Cockermouth River

- Cockermouth River is a significant contributor to Newfound Lake providing 30% of its water.
- Hebron has identified the Cockermouth as a designated brook, under NH Comprehensive Shorelines Protection Act. (CSPA) As a designated brook, the Cockermouth should not be compared to a river, such as the Smith River in Bristol.
- As far back as 1985 Hebron has encouraged a green belt be maintained along the shores of Newfound Lake and along all streams feeding into the lake, for the purpose of protecting water quality and the rural environment.
- High concentrated people use on a “significant erosion” section of the river will substantially increase the risk erosion of the river banks, and subsequent damage to its eco system.
- The health of the eco system in the proposed RV park area, directly impacts the watershed and Newfound Lake.

### View Shed Impacts

The Application states that the view shed analysis provided, was taken from the center of the proposed RV park acreage. That site line is narrow in scope, and does not adequately analyze the impact to the view sheds affected.

- I interviewed a licensed real estate broker, with 40 years of experience with buying and selling real estate in this area, including Hebron.
- I asked what is taken into consideration when determining view impacts (pro/con) of a property; do you stand in the middle of the property when making that determination? Answer: No.
  - All locations on the property are taken into consideration when determining view impacts.
  - Views can vary from partial to full, and can vary within one property.
  - Individual property impacts are assessed by a licensed Real Estate Appraiser. Appraisers typically do not make blanket statements around property values, as each property is unique.
  - Standing in the middle of a property does not take into consideration other people’s use of their property. Front, side, back yards. No one wants to host an outdoor event, birthday party, wedding, BBQ, overlooking an RV park.
  - Broker also brought up traveling along Groton Road as part of the view shed impact.
  - Groton road is a main thorough fare to NH State Park Sculptured Rocks. During the peak tourist season, which is same season for RV park, tourists travel along this road, and their impression of the views, points back to the perception of the quality of the town of Hebron.
- As shown in Photos # 2 and # 3, the outline of the acreage of the proposed RV park shows the extent of the view shed, (the potential for a 360 degree impact, possible view impact from Hebron Town Forest), and the concentration of impacts to properties and tourist travel along Groton Road.
- View Shed impacts have to be considered from off-site locations to be applicable.



### Rendering of Dense Cluster Camping in Open Fields.

The space plan rendering, Attachment # 1, is in scale to itself, but as it is hand drawn, is a depiction of the campground “floorplan” provided in the application. Vehicle samples displayed are based upon the target market as defined within the RV park application. I did some research on what types of RVs are popular on the higher end of the market share. Samples here include Class A motorhomes, Fifth Wheels, and travel trailers including an Airstream, as that model was specifically mentioned in the application. Trucks and SUVs represent the volume of vehicles per site mentioned in the application, plus three visitor vehicles. As no clear documentation of Maximum People Quantity Allowed was defined in the RV park application, up to and including the allowable tent use, I applied the people quantity accommodated by each RV, plus 2 persons per tent per site, and for sake of argument around no maximum quantity defined, one site contains 2 tents, plus adding the 3 visitor vehicles allowed (2 people per vehicle), resulting in 88 people displayed.

- Contained within the application, the RV park provides examples where it compares itself to a fixed structure setup supporting hospitality industry, such as B&B, AirB&B, Inns, etc.
  - Using this rationale, taking the people count exemplified here of 88, and dividing that into 2 person per room requirement for fixed structures, this equates to a 44 room Inn. Taking the people count listed in application of average of 5 people x 9 sites= 45, divided by 2 person per room equates to a 22 room Inn. Neither of which are allowed by Hebron zoning laws. (Hebron zoning regulations currently limit Inns to 10 rooms.)
  - The difference being, the structures housing the people contained within the RV park, will be removed at the end of the season.
  - However, this transitory structure setup does not remove Hebron from having to staff and support this additional mass of people for safety coverage, (police, fire and EMT).
  - Adding to this is that Hebron is contractual bound to support the Town of Groton for Fire and EMT support. Of which Hebron is financially compensated. So now an outside municipality is part of the risk factor.
  - The residents of Hebron (and Groton), will be impacted by the strain of this additional mass of people, for health and safety support over the RV park’s season.
- Impacts defined to the Cockermouth River and the abutter Darlington property when using examples of 45 people, this rendering of 88 people, indicates those impacts would be doubled. Instead of 7,800 +/- people days of impact, now looking at 15,600 +/- people days of impact across the season.
- Note: the application statement referring to tents reads:
  - “Tenters will not be allowed on the property (unless friends or family).”As there is no specific definition around “who, what” constitutes “friends or family”, and no specific definition around “where” that tenting will occur, this opens up this statement for interpretation. Interpretation displayed here: by indicating tents will not be allowed, removes the tents from the Hebron zoning minimum sq ft requirement calculation, as that requirement lists tents as a separate entity impacting the minimum square footage. By not providing specific

language around "friends and family", interpretation here was intended to place tents of friends and family of the campers within the same area as their RV unit.

- Hebron zoning requirement statement around minimum square footage requires that each rental space for any tent, camper, travel trailer or other transient unit shall contain a minimum square footage as defined in the requirement. The zoning requirement does not allow per group of units within the minimum square footage for each unit. The interpretation here allocates two camping units per site (RV, tent) and does not meet the Hebron zoning requirements for minimum square footage. Any scenario or interpretation of layout of camping units would be considered out of compliance with the Hebron zoning requirement, as the foundational layout as provided in the RV park application, is a misuse of the minimum square footage requirement.

In summary, reviewing all the bullet points mentioned above:

- Damage to Cockermouth River, watershed and Newfound Lake;
- Strain to the municipal infrastructure to the town of Hebron, risks to residents, including town of Groton, for safety support coverage;
- View Shed Impacts along Groton Road and surrounding properties, including tourist travel;
- Impacts to Darlington property risks resulting in our potential financial ruin, to the benefit of Corporate Financial Gain.

A prudent person would recognize the risk of damage to the Cockermouth, the downstream watershed, and ultimately Newfound Lake, as caused by the RV park's customers' high volume recreational usage of the brook.

This application for the proposed RV park goes against the harmonious and aesthetically pleasing vistas and views, especially along rural river valleys. Thus not meeting a basic requirement of the Hebron Master Plan vision and goals. This site plan application for the proposed RV park should be disapproved.

Signed,



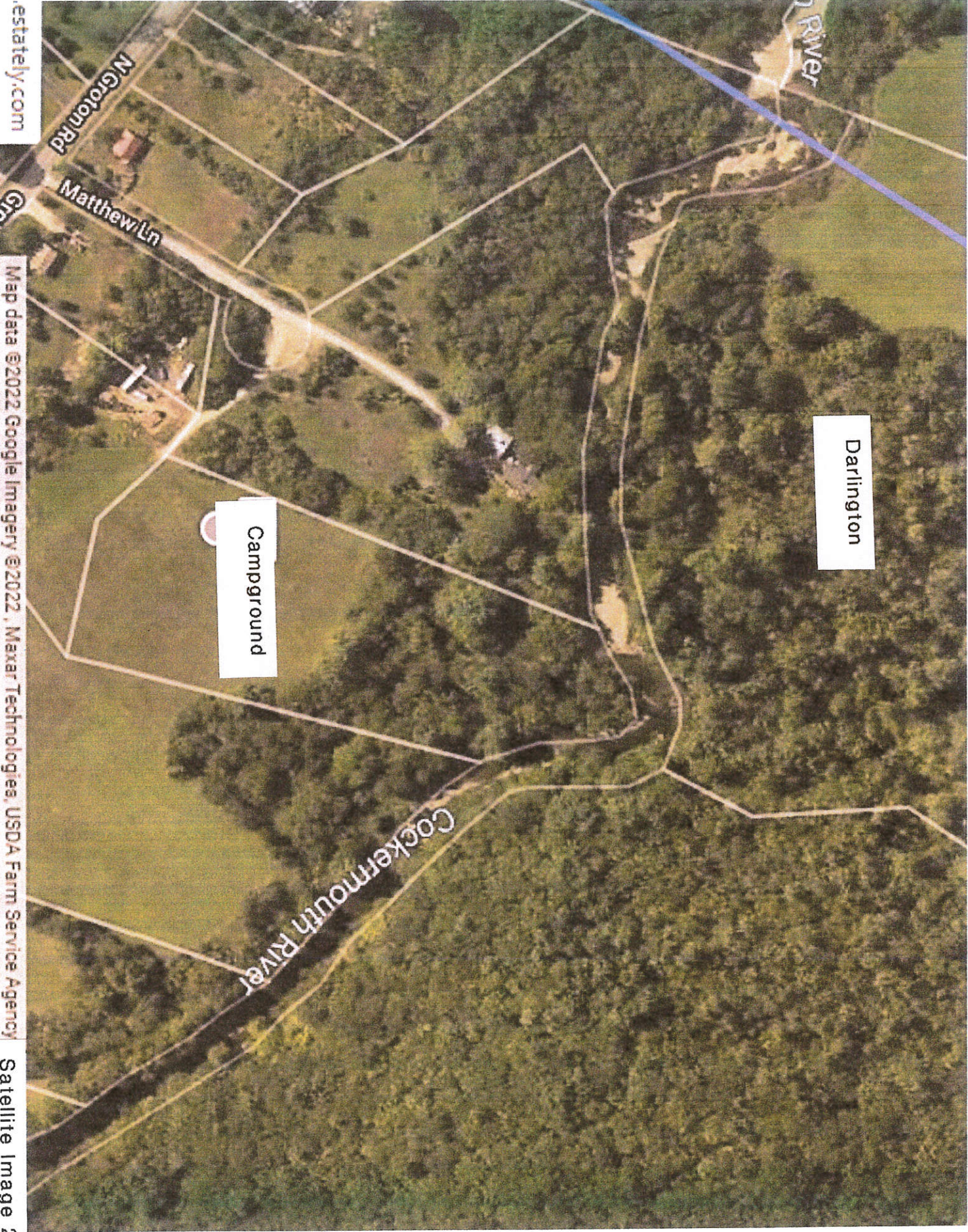
Stacey Darlington  
Abutter





Satellite Image 1









USGS 01077400 COCKERMOUTH RIVER BELOW HARDY BROOK, AT GROTON, NH

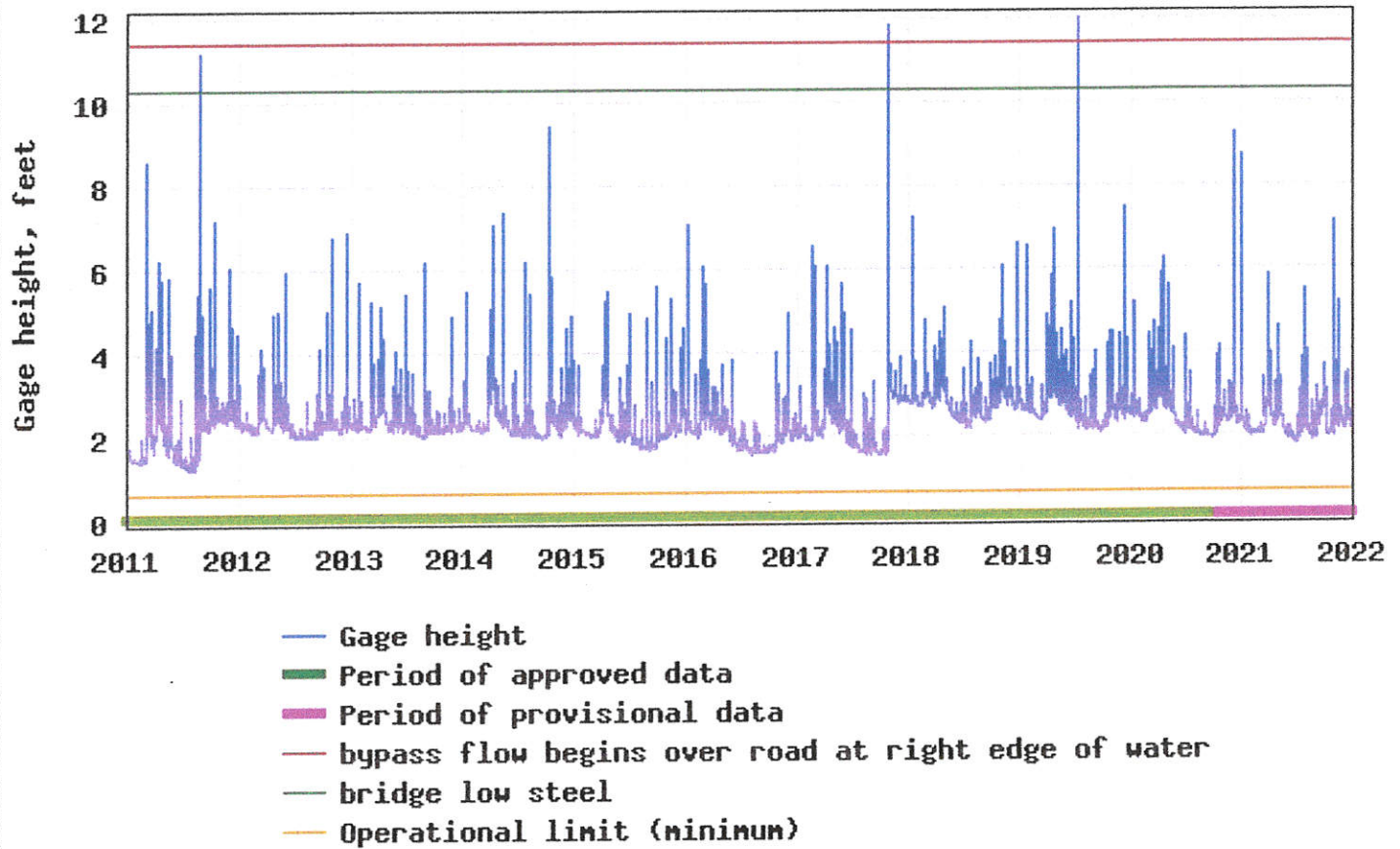




Photo 1





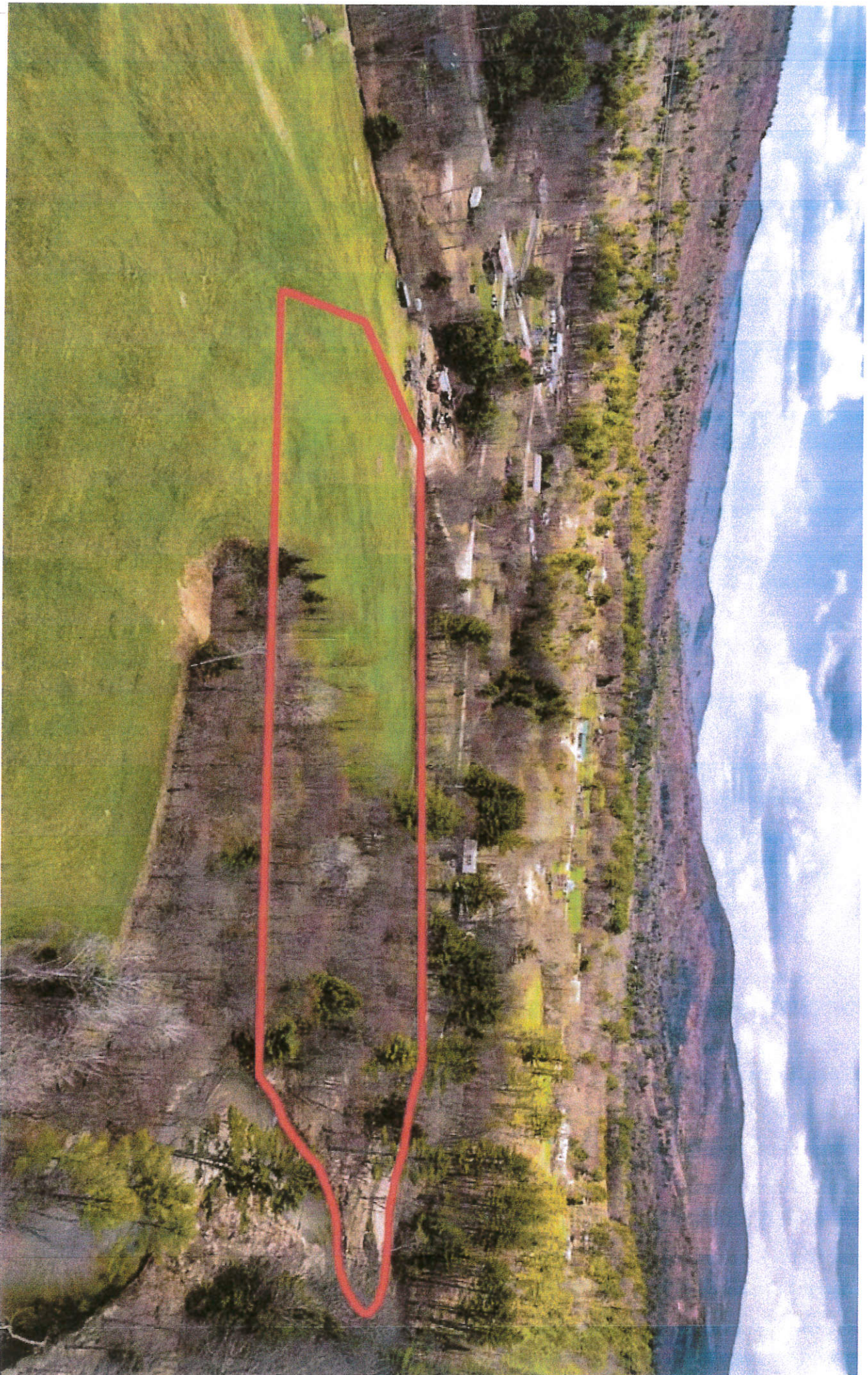


Photo 2



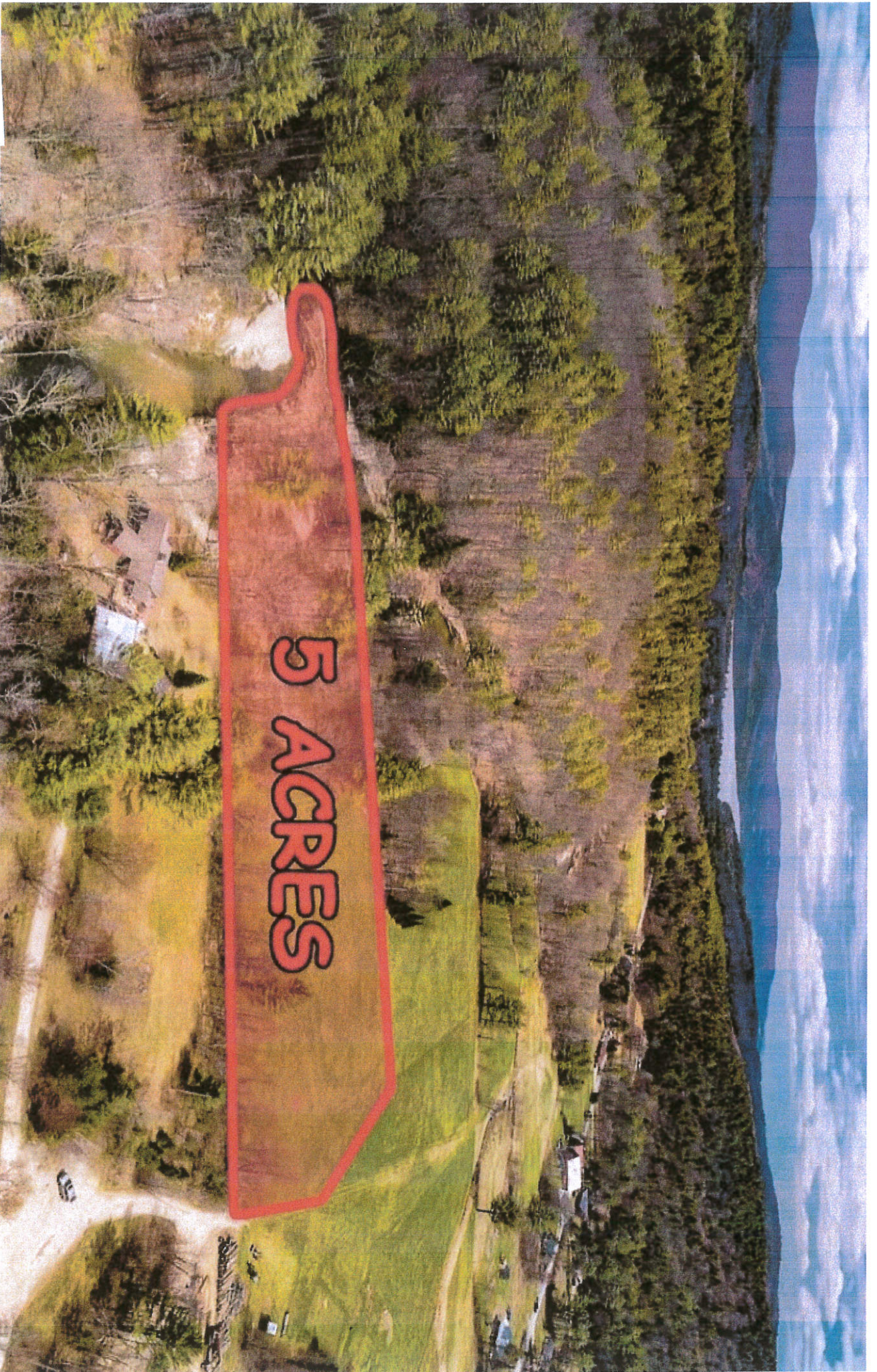


Photo 3