



NASHUA REGIONAL PLANNING COMMISSION

October 18, 2019

Neil Faiman, Chairperson
Wilton Zoning Board of Adjustment
42 Main Street
PO Box 83
Wilton, NH 03086

Re: Review of Regional Impact for Quinn Properties, LLC Variance Request

Dear Mr. Faiman and Members of the Board:

On September 10, 2019, the Wilton Zoning Board of Adjustment (ZBA), per NH RSA 36:56, reviewed Quinn Properties, LLC case 7/9/2019-1 requesting a height variance for proposed asphalt plant silo(s) and determined that the project may, if approved have a regional impact. The Nashua Regional Planning Commission (NRPC) was then notified on September 19, 2019, via certified mail, of the potential regional impact and was requested to provide input on the subject.

It is our understanding that the proposed use, an asphalt plant, is a permitted use in Wilton's B-10 Industrial District. The variance requested is to permit a 72-foot high silo and 68-foot high "batch plant" whereas a maximum height of 45 feet is permitted for both structures in the Industrial District. Based on our review of the application materials available to us, it is unclear whether the requested height variances are necessary for practical or efficient operation of the proposed use or whether they are intended to increase the proposed asphalt plant's capacity. Clarification of the reasons behind the variance request would be helpful in framing the scope of any potential impact. NRPC's review of the pending application is limited to issues that may be of regional impact only. Such potential issues related to the pending case could include groundwater impacts, visual impacts, potential emissions and traffic.

Regarding potential groundwater impacts, it is our understanding that the portion of the site proposed for the subject development is not located within the Aquifer Protection District, however, the proximity of the proposed facility to Aquifer Protection District boundaries should be clarified. It appears based on the plans submitted, that petroleum products would be stored within a containment area. Should the project advance to the Planning Board, the sufficiency of proposed containment areas should be reviewed in greater detail and a Spill Prevention, Control and Countermeasure Plan should be provided. In the minutes of the July 9, 2019 ZBA meeting, the applicants asserted that the proposed structure would not be visible to surrounding properties not owned by the applicants or from the road. No counter testimony appears to have been provided and a review of property information, topography and aerial imagery appears to support

the assertion. No information relative to emissions can be found in the record. The applicants should address the potential for emissions that could result from the proposed facility.

Regarding traffic, the record shows that materials will be both trucked into and out of the site and it is reasonable to assume that there will be employees on the site as well. The requested height variance is likely to impact the viability or capacity of the facility and consequently, overall traffic volumes. No traffic related information, however, appears to have been provided. In order to adequately complete its review, NRPC respectfully requests that a traffic study be provided that includes, at a minimum, the following:

- 1.) Trip generation data and traffic distribution patterns;
- 2.) Average daily and maximum daily traffic generated by trucks delivering to and from the proposed plant;
- 3.) Identification of all roads and intersections to be impacted;
- 4.) Estimated peak hour turning movement counts;
- 5.) Typical load capacity of trucks entering and exiting the site;
- 6.) Identification of any potential adverse traffic impacts and a description of any proposed mitigation measures.

Thank you for the opportunity to review this pending application. If the board should require and additional information or assistance, we would be pleased to comply.

Sincerely,

NASHUA REGIONAL PLANNING COMMISSION


Jay Minkarah
Executive Director

cc: NRPC Commissioner Kermit Williams
NRPC Commissioner Jim Kofalt
William Keefe, Esq.