



## Warner River Local Advisory Committee

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Via email: [Kevin.D.Thatcher@des.nh.gov](mailto:Kevin.D.Thatcher@des.nh.gov)

May 20, 2025

Mr. Kevin Thatcher  
Alteration of Terrain Bureau  
DEPARTMENT OF ENVIRONMENTAL SERVICES  
29 Hazen Drive, P.O. Box 95  
Concord, New Hampshire 03302-0095

RE: Review Comments  
Alteration of Terrain Permit Application #250327-055  
Jennesstown Manor  
Map 7 Lots 39 Route 103  
Warner, New Hampshire

Dear Mr. Thatcher:

The Warner River Local Advisory Committee has reviewed the Alteration of Terrain Permit (AOT) Application (DES #250327-055) submitted by Keach-Nordstrum Associates, Inc. (of Bedford, New Hampshire) for the proposed Jennesstown Manor project (State Route 103, Warner, New Hampshire), on behalf of applicant Peacock Hill Road, LLC (145 Old Town Road Weare New Hampshire). The review involved examination of materials provided by Keach-Nordstrum in support of the AOT permit; U.S. Geological Survey aquifer mapping; and the Warner Ground Water Protection Overlay District map.

Since the proposed project falls within the Warner River Designated River Corridor and, because the project requires an AOT Permit from the NHDES, the applicant and the DES, notified WRLAC. The WRLAC respectfully provides the following comments:

- 1) The proposed project is adjacent to a "Significant Sand and Gravel Aquifer" as mapped by the U.S. Geological Survey. More specifically, the project is very close to the most productive part of the aquifer along the Warner River where thickness and permeability, and therefore aquifer yield, are greatest. (Geohydrology and Water Quality of Stratified-Drift Aquifers in the Contoocook River Basin, South-Central New Hampshire: U.S. Geological Survey Water Resources Investigation Report 92-4154). All runoff from the proposed project will eventually reach the Warner River through small intermittent streams or via groundwater discharge.
- 2) The proposed project is also adjacent to the Town of Warner Ground Water Protection Overlay District, which is based on the above-mentioned U.S. Geological Survey mapping. (<https://warnernh.gov/tow/downloads/gpc/Facts.pdf>). All runoff from the proposed project will eventually be discharged to the aquifer protection overlay district area. Also, please include the extent of the Warner Ground Water Protection overlay on the Web GIS Figure.
- 3) Several test pits completed at the site in 2024 show that the site has a thin veneer of soil atop bedrock. Bedrock is exposed along much of the property frontage along Rt 103. Furthermore, the test pit logs included in the application (Sheet 11) are misleading because they do not use consistent units of measurement and should be corrected in the final application. The final depths of the test pits are labelled in feet while shallower depths are in inches.

*BRADFORD, HOPKINTON, SUTTON, WARNER, WEBSTER*

- 4) The existing conditions description included in the application states that there are “many ledge outcroppings on site”. The mapping provided by the applicant fails to indicate where the bedrock outcrops are located. The final application should indicate where the outcrops are located based upon field mapping by a registered professional geologist.
- 5) The AOT application states that no blasting will be required for this project. However, based upon examination of the test pit logs, the bedrock outcrops along the property frontage on Rt 103, and the existence of “many bedrock outcrops” it is very possible that blasting will be required to complete the project. Blasting could result in contamination of ground and surface water runoff from the site which would ultimately travel to the Warner River and the adjacent aquifer.
- 6) Sediment control during and after construction is critical. All runoff from the site is directed to 4 catch basins along 103 and to abutters property. As noted above, runoff from this site, through the culverts along Rt 103, will eventually reach the Warner River and the aquifer adjacent to the river. Periodic maintenance of the catch basins and culverts should be required.
- 7) The AOT application states that there is no need for Small Community Well approval by the NHDES. However, the application states that the proposed dwellings will share water supply wells and septic systems. In New Hampshire, water supply systems that supply water to 25 or more people, at least 60 days each year, are considered Public Water Systems. It seems possible that 25 or more people could inhabit the eight housing units proposed for the project and therefore the water supply system would be subject to NHDES regulations applicable to such systems.

By this letter, we are expressing our concerns about the potential that the proposed development could have on groundwater and surface water quality along the Warner River and the adjacent aquifer.

Thank you for your attention to this matter. Please contact me if you have questions or require additional information.

Very truly yours,  
WARNER RIVER LOCAL ADVISORY COMMITTEE

Daniel J. Morrissey  
Chair

cc. Warner Conservation Commission (concomWarnerNH.gov)  
Warner Planning Board (landuse@warner.nh.us)  
Jason Lopez, Keach-Nordstorm Associates, Inc. (jlopez@keachnordstrom.com)