



## Regional Planning Commission & Economic Development District

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February 14, 2023

**To:** The Honorable Members of the Coös County Planning Board

**Re:** Expansion of Balsams Ski Area a Development of Regional Impact as described within the document entitled ‘*Developments of Regional Impact – Review Guidelines for the North Country Per NH RSA 36:54-58*,’ adopted October 28, 2010 by the North Country Council Representatives.

Thank you for notifying North Country Council of the proposed development of regional impact within your district. NCC staff has reviewed the development as presented in the plan set ‘Dixville Capital Ski Area Site Plan 2022,’ submitted by Dixville Capital, LLC. dated 9/28/2022 with revisions through 12/30/2022. The development includes expansion of the Balsams Ski Area on NH Route 26 in Dixville (Tax Map 1626, Lots 1, 2, 3.3, 3.4, 6.3, 6.4, and 6.4a) as presented with ski lifts, ski terrain, snowmaking, service roads, a gondola and a ski back bridge over NH Route 26. In response and consideration of this proposal, we have reviewed all posted materials at <https://www.cooscountynh.us/planning-board/pages/dixville-capital-ski-area-site-plan-2022> and:

- Coös County UP Zoning Ordinance & Site Plan Review Requirements & 2006 Master Plan
- Development of Regional Impacts – Review Guidelines for the North Country per NH RSA 36:54-58 (the Review Guidelines)
- NH Wildlife Action Plan maps for Dixville

For ease of reference the comments below are organized within the framework of the Review Guidelines, which establish six (6) areas of interest, each of which containing specific thresholds for impact. In these comments, thresholds which the proposed development appears to meet or exceed are listed alongside a brief analysis and recommendations from North Country Council.

### **Six (6) Areas of Interest:**

- 2.1 Economic Structure
- 2.2 Infrastructure Capacity
- 2.3 Settlement Patterns or Regionally Significant Features (*possible impact described*)
- 2.4 Natural Resources
- 2.5 Quality of Life – Emissions (*possible impact described*)
- 2.6 Directly Abuts a Municipal Boundary

### **2.1 Economic Structure:** *Might the proposed development affect the economic structure of neighboring municipalities by:*

- **2.1.1.** Increasing the cost of providing energy or other utility services to other towns to the extent it might affect affordability;
- **2.1.2.** Adversely affecting the availability of affordable housing in adjacent towns;

- **2.1.3.** Increasing the need for housing in an adjacent municipality or region to the extent it might affect affordability;
- **2.1.4.** Constructing 50 or more residential units where any portion of the development is within 1,000 feet of a municipal boundary;
- **2.1.5.** Constructing a non-residential development that exceeds 50,000 square feet where the proposed development is within 1,000 feet of a municipal boundary; or
- **2.1.6.** Constructing a non-residential development (e.g., commercial or industrial development) that will exceed 100,000 square feet?

- **Analysis & Recommendation:** North County Council finds two (2) Economic Structure thresholds established in the Review Guidelines appear to be exceeded or met.
  - **2.1.2 & 2.1.3** – Coös County region surrounding Dixville Notch is experiencing significant challenges regarding the availability of housing affordable for local residents and workers. Given the scale of development for recreation, and the challenges regarding affordability and supply, NCC staff suggest the Coös County Planning Board inquire as to the staffing needs of the project and the anticipated wage rates of employees to understand the projects housing needs, as well as the number of visitors the development will draw to understand potential increased demand for housing in Dixville and the surrounding towns.

**2.2 Infrastructure Capacity:** *Might the proposed development affect the infrastructure capacity of neighboring municipalities by:*

- **2.2.1.** Creating access to the development through a neighboring town;
- **2.2.2.** Substantially affecting the traffic-carrying capacity of regionally significant highways and other transportation facilities within other towns;
- **2.2.3.** Creating a new road or a point of access between municipalities;
- **2.2.4.** Generating 100 or more vehicle trips per day into an abutting or nearby municipality as determined by the most recent published version of the Trip Generation Manual;
- **2.2.5.** Producing excessive solid waste or requiring a significant increase in the capacity for solid waste disposal facilities;
- **2.2.6.** Requiring new or significant additional utility services not already available;
- **2.2.7.** Generating student populations that will adversely affect school capacities in one or more neighboring municipalities (e.g., residential developments at any location in a given municipality when students are tuitioned in another municipality);
- **2.2.8.** Requiring capital outlay beyond town borders for the expansion or development of additional utility transmission lines or other public services; or
- **2.2.9.** Generating demand for emergency response personnel?

- Analysis & Recommendation: North Country Council finds that three (3) Infrastructure Capacity thresholds appear to be exceeded or potentially met.
  - **2.2.4**— The proposed development may have the potential impact of generating 100 or more vehicle trips per day. NCC notes that the applicant has requested to defer submittal of traffic generation models until a later application. NCC recommends the Coös County Planning Board ensures that traffic generation, and impacts of the development be explored thoroughly along the course of review, and regional comment and impact consideration is allowed once such are submitted.
  - **2.2.5**— The proposed development includes deforestation for trail clearing and excavation which may generate large volumes of natural waste for disposal. NCC recommends the Coös County Planning Board request the applicant to explain their disposal plan for the stumps, wood debris, and soil removed for development.
  - **2.2.9**— As with any development and the increase of workforce the potential for increased need of emergency services may be required. Dixville is served by 45<sup>th</sup> Parallel EMS and Errol Rescue Squad. NCC recommends the Coös County Planning Board ask the developer to explain the Emergency Services demand and assess the adequacy of current services to support the development project. Additionally, NCC recommends the applicant contact local EMS services to determine if those services can meet the potential demand for this phase of the project and future phases.

**2.3 Settlement Patterns or Regionally Significant Features:** *Might the proposed development affect the settlement patterns or regionally significant features of the Region by:*

- **2.3.1.** Requiring the alteration, degradation or destruction of designated regionally significant historic, cultural, natural or scenic features;
- **2.3.2.** Being located in geographic areas that have not supported that size and type of proposed development in the past; or
- **2.3.3.** Being incompatible with the architectural or design features of nearby existing structures

- Analysis & Recommendation: North Country Council finds that one (1) Settlement Pattern or Regionally Significant Features appear to be exceeded or met:
  - **2.3.2**— While the site was a previously established resort and ski area, the proposed development is increasing the ski terrain by 350 acres of new trails via strip clear cut and 480 acres of glade skiing, along with the installation of new ski lifts, snowmaking apparatus, and service road. This is a significant increase of use in the area. Additionally, NCC notes that the full development will include multiple applications approved in Phases and include notably more development than in this Site Plan application. As such NCC recommends that the Coös County Planning Board ensure that the total sum of development proposed is assessed, understood, and property mitigated across phases of the project and that opportunities for regional review and comment be provided along the way.

**2.4 Natural Resources:** *Might the proposed development affect the natural resources of the Region by:*

- **2.4.1.** Producing excessive pollutants or substantially degrading air quality or water quality or quantity beyond town borders or within the watershed;

- **2.4.2.** Requiring a large water withdrawal or a number of water withdrawals whose cumulative impact is equivalent to a large water withdrawal (defined as 57,600 gallons or greater per day by NHDES) and the proposed development is located within 1,000 feet of any aquifer or surface waters that transcend municipal boundaries;
- **2.4.3.** Requiring indoor, outdoor, or underground storage, or the use or transfer of chemicals or other potential pollutants in quantities greater than associated with a typical household and the proposed development is located within 1,000 feet of any aquifer or surface waters that transcend municipal boundaries.
- **2.4.4.** Altering, degrading or destroying the habitat and natural municipalities of plants and animals that have been identified as worthy of protection; or
- **2.4.5.** Substantially reducing the area or productive capacity of regionally significant forested and agricultural lands; (impact to contiguous conservation areas and greenways would be trigger thresholds)?
- **2.4.6.** Altering, degrading, filling, developing or building a structure within the defined flood hazard areas and floodways in such a way that waters using the flood hazard areas and floodways would be further restricted, possibly causing adverse impacts further down the watercourse including a higher mean high water mark in the case of either natural or unnatural flooding. In this case the parties notified as abutters would be the municipalities located further downstream or downriver on the water course?

- **Analysis & Recommendation:** North County Council finds that two (2) Natural Resources thresholds established in the Review Guidelines appear to be exceeded or met:
  - **2.4.2—** Upon review of all submitted documents, there is no indication of how much water would be withdrawn for snowmaking operations. Therefore, NCC is unable to determine if this development would result in regional impact as determined by the thresholds established in the Review Guidelines. NCC recommends the Coös County Planning Board request the developer to include estimated withdrawal amount for annual snowmaking operations during this application, or that additional opportunities for regional comment are provided when such water volumes are understood.
  - **2.4.4** NCC has reviewed the NH Wildlife Action Plan, maps, and listing of threatened or endangered species. The development site appears to contain: **High elevation spruce-fir, Northern hardwood-conifer, Rocky Ridge, and Cliff or Talus slope** per the NH WAP, this habitat within Dixville is listed as a possible habitat for 32 of such species, and the area is listed as highly ranked for the biological region as well as designated support landscape per the NH WAP map of Habitat by ecological condition in Dixville. Thus, deforestation of said area, in support of development, will have an undeniable impact upon this landscape. NCC notes that NH DES has approved Wetlands Permit # 2015-00425 which accepts the total of 959 total acres of compensatory mitigation of 2.68 permanent impact to wetlands. Including trail and tower cuttings, total acreage impacted is 832.68 with a combination of strip cuttings and selective cuts. NCC recommends the Planning Board of Coös County to discuss with the developer any potential areas where the limits of clearing can be tightened to retain existing mature growth.

**2.5 Quality of Life – Emissions:** *Might the proposed development affect the quality of life in the Region by:*

- **2.5.1.** Producing or having anticipated emissions such as light, noise, smoke, odors, or particles that may impact a neighboring municipality;
- **2.5.2** Producing or having anticipated visual impacts such as, but not limited to cell towers and wind farms, that may impact a neighboring municipality, including municipalities not directly abutting the host municipality?

- **Analysis & Recommendation:** North County Council finds that no Quality of Life – Emissions threshold appears to be met or exceeded.

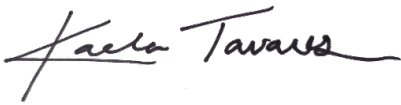
**2.6 Directly Abuts a Municipal Boundary:** *Is the proposed development on land that directly abuts a municipal boundary?*

- **2.6.1.** If so, is it going to affect neighboring properties in an adjacent municipality? If it might, the neighboring local land use board should consider making a determination of regional impact.

- Analysis & Recommendation: North Country Council finds that the project does not abut a municipal boundary.

During the course of formal review North Country Council may provide further written comment or oral testimony on the proposed development.

Sincerely,



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