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September 18, 2020

Mayor and City Council
City of Concord
41 Green Street
Concord, NH 03301

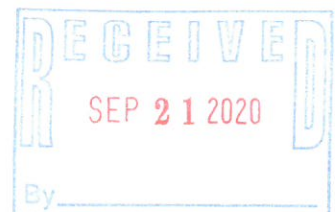
Re: East Concord Ground Water Depletion

Dear Mayor Bouley and Members of the City Council:

I am a semi-retired environmental lawyer and former New Hampshire Assistant Attorney General, and owner of approximately 75 acres of land situated on Graham Road in East Concord, most of which I have owned for more than forty years. I am also a unit holder in Generation Farm LLC, which operates a successful certified organic vegetable farm on the property that is managed by James Taft Stever, my son, and his wife Marley Stever. Generation Farm has been in business since 2011 and it relies on an adequate supply of uncontaminated ground water to support its crop of salad greens. We have not had a problem with adequate ground water until recently. Even during the severe drought in 2016 the Farm's wells did not dry up. This summer has been a dry summer, but not as dry as 2016. However, a Generation Farm deep well drilled near Graham Road, and which has very little use, went dry.

We are trying to determine why suddenly the local aquifer seems to be depleted. I am concerned that the reason for this could be over use of the aquifer by recently constructed residential homes in the area. In the past ten years, in spite of the fact that the pre-existing City of Concord land use plan required the northeastern end Concord to remain rural, the city's planning staff and the Planning Board have approved a number of applications for subdivision of land in the Hoit Road and Graham Road area of East Concord, including approval of a multi-unit cluster development directly across Graham Road from Generation Farm and the other pre-existing properties on the road. Most of the houses in these new subdivisions have been built within the last four or five years and are now significant ground water users.

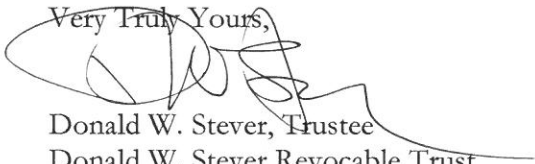
There does not appear to be a major amount of precipitation forecasted prior to the onset of winter and frozen soil. Even if it rains or snows after the ground freezes that water will not replenish the underlying aquifer. If local residential wells dry up as winter arrives there will be a serious public health and economic problem in East Concord.



Has the city undertaken a ground water supply analysis for this area to determine the capacity of the underlying ground water aquifer? If not, it would be wise for the City to do so before it approves any more subdivision applications for properties in the area. If the capacity of the aquifer, in light of long-range climate change model predictions, is not sufficient to support additional domestic wells in the area then the City Council should seriously consider a moratorium on the approval of additional residential subdivisions and building permits in the area unless the city's public water supply infrastructure is extended to serve the northeastern sector of the city.

I shall be willing to appear at a Council meeting to discuss this further.

Very Truly Yours,



Donald W. Stever, Trustee
Donald W. Stever Revocable Trust

Cc: James T. Stever, Generation Farm LLC