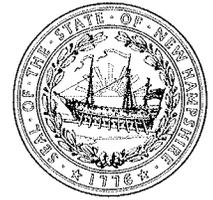




The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

March 1, 2011

The Honorable Gene Chandler, Chairman
House Public Works and Highways Committee
Room 201
Legislative Office Building
Concord, NH 03301

Re: HB 287-FN-A, making an appropriation for funding disaster relief and hazard mitigation in response to the May 2006 Suncook River avulsion.

Dear Chairman Chandler:

Thank you for the opportunity to comment on HB 287-FN-A, which would appropriate \$7,050,000 to address “ongoing erosion, sediment migration, and [an] expanding floodplain” resulting from the 2006 avulsion of the Suncook River. The bill proposes to expend up to \$50,000 on an engineering study to “determine the preferred solution”, to provide up to \$6 million to implement the “preferred solution” identified by the engineering study, and provide up to \$1 million to dredge sediments from the river. The Department of Environmental Services (DES) does not support this legislation.

During the historic flood of May 2006, the Suncook River suddenly shifted its course. The sudden shift in a river is known as an avulsion. While avulsions are rare, they have occurred on rivers in New Hampshire, including previously on the Suncook River, during periods of extremely high flows.

The avulsion of the Suncook River has significantly increased erosion of the banks and bed of the river in the vicinity and upstream of the avulsion, as well as sedimentation downstream. However, the ability to control these natural processes is limited, as demonstrated by failed attempts in rivers in New Hampshire, as well as around the world. For this reason, we have focused our response to the Suncook avulsion on achieving two overarching goals: (1) protecting vital infrastructure; and (2) reducing the risk of loss of life or property damage from future floods. DES opposes HB 287-FN-A because the approach proposed under the bill would face significant technical challenges and would likely not be successful. The data collected and the analysis performed to date do not support the concept that dredging will provide relief from flooding or that stabilization of the avulsion area or returning the river to its pre-avulsion channel would be a technically reliable or cost effective solution.

Instead of the approach proposed in HB 287-FN-A, DES recommends continuing the efforts that DES and the Department of Safety (DoS) have initiated to protect infrastructure and reduce the risk of loss from future floods on the Suncook River. Since the time of the avulsion in May 2006, DES and DoS have worked closely with the affected communities of the Suncook River valley to address the impacts associated with the avulsion. Included in our many efforts were funding and assistance we provided to the Town of Epsom to help the town complete an engineering study to identify possible actions that could be taken in response to the avulsion.

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We also assisted Epsom in applying for grants in both 2008 and 2009 from the Federal Emergency Management Agency (FEMA) under the Pre-Disaster Mitigation Program to implement a river stabilization project recommended in the engineering study. Unfortunately, FEMA did not approve the grants because the benefit-cost ratio for the project was too low based on FEMA criteria. Consequently, we have since developed other approaches, as described below, to address the impacts associated with the avulsion, with a focus on public safety and infrastructure protection.

In his Capital Budget Proposal, the Governor, at the request of DES and DoS, has included funds to support the following projects:

- (1) \$850,000 for construction of in-channel grade control structures for protection of the Route 4 and Black Hall Road bridges from ongoing river adjustments caused by the avulsion.
- (2) \$185,000 for a geomorphic assessment of the entire length of the Suncook River from the headwaters in Gilmanton to its confluence with the Merrimack River in Allenstown and Pembroke. This would provide a delineation of the fluvial erosion hazard zones adjacent to the river to enable identification of the properties that are the most vulnerable to damage from river channel changes. This would be an important step for the state and local communities to better manage the risk to people, private property and public infrastructure as the Suncook River continues to adjust its course.
- (3) \$200,000 for the removal of the Buck Street Dam in Pembroke and Allenstown, which would reduce flooding of properties along the Suncook River in Pembroke, upstream of the dam.

We look forward to discussing these projects further with you at the DES capital budget hearing before your committee.

In addition, DoS and DES, with the assistance of the Central New Hampshire Regional Planning Commission, are currently working with the Towns of Allenstown, Pembroke, Epsom, Chichester, and Pittsfield to complete a list of 26 different tasks, developed by the communities, to help mitigate against the effects of the Suncook avulsion and reduce future damage. These tasks range from installing an additional river gauge to flood-proofing a municipal water supply.

Another high priority that has been identified is to provide at-risk homeowners with the option for public acquisition and demolition, or relocation of their homes. DES and DoS continue to work with the affected communities to pursue funding for this alternative in order to reduce the risk of loss of life or property damage from future floods on the Suncook River. To this end, the Governor has indicated a willingness to support a legislative effort to amend the current Capital Budget proposal to include up to \$2 million to provide matching funds to leverage grants under the FEMA Unified Hazard Mitigation Assistance Program. If appropriated, these Capital funds can also be used for the direct buy-out of homes or other structures that are at risk, should federal or other funds not become available.

We urge the legislature to support these efforts in favor of the approach proposed under 287-FN-A.

Thank you for the opportunity to comment on this important legislation. If you have any questions or need additional information, please contact Steve Couture, Rivers Coordinator at 271-8801, or me at 271-2958.

Sincerely,


Thomas S. Burack
Commissioner

Enclosures
TSB/pmc

cc: Governor John H. Lynch

James I. Richardson, Special Assistant for Policy, Governor's Office
Boards of Selectmen (Chichester, Epsom, Allenstown, and Pembroke)

Senator Jack Barnes

Representative J. Brandon Giuda

Representative Dan McGuire

Representative Jon Richardson

Representative John McDonnell

John J. Barthelmes, Commissioner, Department of Safety

Christopher M. Pope, Director, HSEM, Department of Safety

Senator Sylvia Larson

Representative G. Brian Seaworth

Representative Tony Soltani

Representative Carol McGuire