

**ACT 250**  
**MUNICIPAL IMPACT QUESTIONNAIRE**

This questionnaire is intended to help applicants gather evidence to submit under Criterion 7 - Municipal Services. A letter or narrative from the Town Manager, Selectboard Chair or appropriate official may also serve as evidence.

**APPLICANT TO COMPLETE:**

Applicant Name: C.A. Denison Lumber Company, Inc. & Ashfield Stone, LLC  
Municipality: Halifax  
Title and Date of Site Plan Submitted: C.A. Denison Lumber Co., Inc. Sheet C-1 Legend and General Notes, Sheet C-2 Overall Site Plan, Sheet C-3 Stream Crossing Plan, Sheet C-4 Overall Grading and Drainage Plan, Sheet C-5 Stormwater Treatment Pond 1 Plan, Sheet C-6 Stormwater Treatment Pond 2 Plan, Sheet C-8 Details, Sheet C-9 Details, Sheet C-10 Details, Sheet C-11 Details, all of which are dated December 13, 2014.

**TOWN MANAGER, DEPARTMENT HEADS, OR EQUIVALENT TO COMPLETE:**

a) Does the municipality have the capacity to provide the following services without unreasonable burdens for the above project:

- |                      |  |  |
|----------------------|--|--|
| Fire Protection      | <input type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Mun. does not provide this service. |
| Police Protection    | <input type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Mun. does not provide this service. |
| Rescue Service       | <input type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Mun. does not provide this service. |
| Solid Waste Disposal | <input type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Mun. does not provide this service. |
| Road Maintenance     | <input type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Mun. does not provide this service. |

b) If "no", what are the deficiencies? \_\_\_\_\_  
\_\_\_\_\_

c) If the service is unavailable from the municipality, who provides the service so that the town doesn't have to? \_\_\_\_\_

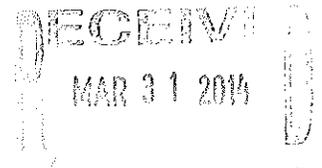
d) Would the deficiencies occur without this project?  Yes or  No? If "no", what measures can the applicant take to alleviate the deficiencies?  
\_\_\_\_\_

e) If the deficiencies are common to many projects, does this project create burdens which are disproportionate to the taxes and user fees to be paid to the municipality?  Yes or  No? If "yes", does the municipality recommend the imposition of an impact fee or other means to mitigate any unreasonable burdens?  
\_\_\_\_\_

f) Are you available, after sufficient notice, to answer questions related to the above statements at an Act 250 hearing?  Yes or  No

**I certify that the above information is true and accurate to the best of my knowledge.**

Name: \_\_\_\_\_  
Position: \_\_\_\_\_  
Date: \_\_\_\_\_



**OFFICE OF THE SELECTBOARD  
TOWN OF HALIFAX  
P.O. BOX 127  
WEST HALIFAX, VERMONT 05358**

26 March 2014

Elizabeth A Cook, Esq.  
Darby Thorndike Kolter & Nordle LLP  
Warren House  
89 South Main Street  
Waterbury, Vermont 05676-1578

Re: C.A. Denison Lumber Co, Inc. & Ashfield Stone, LLC Act 250 Application for a Stone Extraction Project, Letter of March 3, 2014

Dear Ms. Cook:

Thank you for your letter with preliminary information about the proposed stone extraction project off Jacksonville Stage Road in Halifax. This letter will serve as our response to your request about the need for an access permit as well as an outline of potential Municipal impacts for Act 250.

Access Permit

The Town of Halifax does require an access permit. Although the direct access to the Class 4 Road of TH 52 is from an existing logging road, for any more permanent use, or a change in use the town does request a driveway permit, which allows the Selectboard and Road Commissioner to review the site and suggest any needed improvements. We enclose one for your convenience.

Municipal Impacts

**Fire Protection**

Halifax Fire Department, Inc. is a non-profit volunteer Fire Department providing Fire Protection to the town. The municipality does not provide this service, and we assume that the Act 250 process will require additional research and possible accommodation to the direct impacts to that separate entity.

However, it should also be noted that the Town of Halifax indirectly supports the Halifax Fire Department, Inc. through taxpayer-funded budgetary line items including dispatching fees, fire company fees, unleaded fuel costs, equipment and gear, and insurance. If the project should suggest additional special equipment or training for the Fire Department that would also potentially impact the municipal budget for these items, the Town of Halifax would need to understand these impacts and possible mitigation options.

### **Police Protection**

As a small town, and under current state restrictions on the duties of our elected and non-certified constables, the Town of Halifax has minimal police protection. We budget a small amount of money annually to have Vermont State Police patrols on a very occasional basis.

We are pleased to hear that there will be locked gate access to the project. However, given the remote nature of the site, we remain concerned about the possibility for malfeasance in the area, whether that might fall under the age-old propensity for youth to find off-the-beaten path "party sites," or the newer threats coming in from what appears to be a growing illegal opioid trade in Vermont. Addressing these concerns might include either direct funding for security services; technologies to deter or record problems; or other creative suggestions. One rather specific problem that we might have is that we have no equipment and enforcement mechanism today to deal with overweight vehicles, which might be a direct concern for this project.

### **Rescue Service**

The municipality does not provide this service directly. As with the Fire Services, however, the taxpayers vote annually to support some of the insurance and other costs for the volunteer Halifax EMS, and two separate ambulance services which cover different parts of the town. Deerfield Valley Rescue, Inc. covers the portion of town where the proposed project lies, and is largely a volunteer-based organization with a few paid positions. This ambulance service maintains a vehicle in Jacksonville Vermont. Again, we assume that the Act 250 process will require additional research and possible accommodation to the direct impacts to these separate entities.

As a municipality which supports these agencies and general Emergency Management services, we have general questions about possible risks to people working in the mining and supporting industries. We also will want to understand and accommodate if there are any impact to these budgetary line items that will directly impact our taxpayers (EMS insurance, contractual ambulance services, and the like).

### **Emergency Access in General**

The remote nature of this site brings to mind a specific concern about how we might receive notification of any emergencies at the site, especially during extreme weather events. The Town of Halifax lacks cellular coverage (not to mention broadband coverage). Radio coverage is also often challenging. We hope there will be a discussion of this in the Act 250 process. Will there be a landline to this site? Will there be electricity there?

### **Solid Waste Disposal**

The municipality does not provide this service. At a Selectboard meeting in which this project was a topic, residents expressed concerns about a by-product of the mining process: schist dust. Ashfield Stone representative Jerry Pratt noted that farmers sometimes use this byproduct. We would like to understand more about this and other potential byproducts, especially if they include the need for additional traffic. Obviously, understanding if there are local outlets or potential re-uses for the byproducts would be of interest. We are not sure if there would be

something akin to tailings as there are in other mining industries, for example, but these would need to be addressed in the local permitting process.

### Road Maintenance

Road maintenance is the single largest service provided by the Town of Halifax to its residents, property owners, and visitors. It is also an area of increasing expense to the town, and the area where we have the largest direct concerns when considering this project.

What is the proposed traffic pattern for the quarry stone to be trucked to Shelburne Falls? How many trucks will there be? At what weight? How much damage will this new, regular, non-standard, traffic create to our publicly-funded roads and bridges? Given that this is an extractive industry of a non-renewable resource, how long will this quarry anticipate being in operation? What one-time and maintenance costs over time must the Town bear? Can we get assistance from traffic and road engineering resources to assess all potential impacts? How will the impacts be monitored over time?

We note preliminary concerns with the access from TH 52 to Jacksonville Stage Road (TH 2): possibly needing additional signage, drainage, impact on a sizable culvert in that immediate vicinity, and studying the impact on a neighboring house. At least one citizen in particular wanted reassurance that Josh Road would not be used as an access road, but any change to the access route to Jacksonville Stage Road would of course bring new questions.

Our initial guess is that the trucks will use the gravel roads of Jacksonville Stage Road (approx. 2.15 mi on Class 2 Road) to Amidon (approx. 0.4 mi on Class 3) and Stark Mountain Road (approx. 1.17 mi on Class 3). Jacksonville Stage Road, for one example, includes one major bend near the property at 4402, which is a classic Vermont farm, with a house on one side and a barn on the other. Stark Mountain Road is steep and narrow with only "Vermont Guardrail" (aka trees), and meeting a heavy truck on this road would be frightening to many drivers. We question the viability of loads going down Stark Mountain (TH 39). We would like to request a safety study on this. Would there be an increase in accidents? Dust would be a problem on roads during the summer. (We believe there would be no winter traffic based on statements by Ashfield Stone representative Jerry Pratt.) The intersection of this road with Rte. 112 is in Colrain, Massachusetts, so they should also be made aware of the project. Visibility and road signs are two questions there.

Any alternative routes seem extremely unlikely to be suitable, with most of the back-up options facing additional challenges. Our expectation is that the Guilford Covered Bridge would not support large vehicles. Amidon Road has S-curves and is also narrow and much lengthier to get to a paved road. Stowe Mountain Road is also steep and narrow. Bringing the loads all the way into Halifax Village would mean the trucks would need to make a tough left off of a bridge onto 112 with noted visibility and turning radius challenges.

We would like time to review our records of how any potential route was impacted by Tropical Storm Irene, and to assess the bridges, culverts, and structures in the planned route. Many people in Vermont enjoy dirt roads, and some or many neighbors may fight against the idea, but

would this project suggest that pavement would have a better life-cycle cost for the town?  
Gravel pits that are in use in town are directly off paved roads.

In summary, we feel this project will require careful discussion before we can accurately assess the "deficiencies" we may have towards future road maintenance, which would not occur, or not occur to the same extent, without this project. Because we don't have any idea how the presence of a quarry would impact the specific property value (or potentially decrease the value of neighboring properties), it is difficult to judge the overall tax burden, but some sort of impact fee could help the town mitigate any unreasonable burdens if the project is approved.

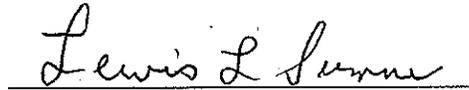
Finally, although not requested, we thought we might share a list of the general concerns and questions we have heard from our citizens:

- Water quality, impact on wells, and runoff
- Seasonality of work at the site
- Number, truck size & style, and weight of trips
- Economic development impacts
- School impacts
- Flora and fauna, especially noting concerns of rare flora in nearby Deer Park Pond
- Noise
- Continued accessibility of existing trails for recreational use

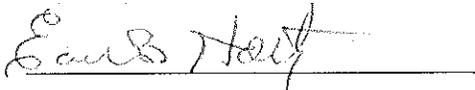
We hope that we can participate in site visits and other meetings and discussions, to learn more about this proposal.

Sincerely,

Halifax Selectboard



Lewis Sumner, Halifax Selectboard Chair



Earl Holtz, Halifax Selectboard Vice Chair



Edee Edwards, Halifax Selectboard Member

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+ Also Admitted in NH  
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March 3, 2014

Edee Edwards, Chair  
Town of Halifax Selectboard  
PO Box 127  
West Halifax, VT 05358

Re: C.A. Denison Lumber Co., Inc. & Ashfield Stone, LLC  
Act 250 Application for a Stone Extraction Project

Dear Chairperson Edwards:

This office represents C.A. Denison Lumber Co., Inc., and Ashfield Stone, in connection with a proposed stone extraction project located off of Jacksonville Stage Road in Halifax. We are writing to request that you complete and return the enclosed Municipal Impact Questionnaire. I am also requesting that you let us know if an access permit is required for the project.

The project, if approved, will involve the removal of large blocks of stone from Denison's property. The stone will then be transported to Shelburne Falls, Massachusetts for processing into various building materials. A set of site plans printed on 11' x 17' paper is enclosed. We anticipate filing the application later this week. At that time, we will send a set of full size plans to the municipal office.

The project, as proposed, will enter Town Highway 52 from an existing logging road on the Denison property. The access point is on the unmaintained portion of TH 52. Vehicles leaving the property would then turn onto town Highway 2 (Jacksonville Stage Road). No improvements are proposed for the intersection of the logging road and TH 52. I have enclosed a color map showing the Town Highways, the existing logging road and the proposed quarry location.

The existing logging road has a modest grade and has been sufficiently designed to allow the passage of loaded logging trucks during recent harvests of the Denison property. A portion of the logging road at its terminus will be relocated to provide access to the quarry site. This new portion of roadway has been designed to allow for the passage of loaded flatbed trucks. Sufficient width, road base, and turning area will be provided for these trucks.

The project does not involve the construction of any permanent structures on the property. Blasting, crushing, and screening are not proposed. No fuel or chemicals will be stored at the project. Access to the project site is controlled by a locked gate.

The Municipal Impact Questionnaire asks whether the municipality will be able to provide municipal services. It appears that the only municipal services that might potentially be required are fire services and emergency medical services. Although it is unlikely that these municipal services would be required, please complete and return the enclosed form to me. Could you also let me know, by signing below and returning to me, whether an access permit is required?

Please call with any questions.

Sincerely,



Elizabeth A. Cook, Esq.

EAC  
Enclosures

An access permit \_\_\_ is \_\_\_ is not required from the Selectboard for the project described above.

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Edee Edwards, Chair  
Town of Halifax Selectboard