

## Piscataquog River Local Advisory Committee

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[www.PiscataquogRiver.org](http://www.PiscataquogRiver.org)

September 24, 2025

Emily Nichols  
Program Manager, Aquatic Resource Mitigation Fund  
NH Department of Environmental Services  
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### **RE: Hadley Falls Dam Removal and River Restoration – ARM Fund Application**

Dear Ms. Nichols,

The Piscataquog River Local Advisory Committee (PRLAC) has reviewed the ARM Fund application for the proposed removal of the Hadley Falls Dam and associated river restoration.

The Committee does not believe that removal of the Hadley Falls Dam will have a determinative positive impact on the river, particularly given the uncertainties related to the presence of potentially hazardous materials in the sediment within the impoundment area.

In our review, we must weigh not only the potential effects on water quality, wildlife, and habitat, but also the impacts on recreation and the broader community. The Hadley Falls Dam and its impoundment provide significant recreational and community value within the Village of Goffstown. Additionally, the Committee questions why the Department of Environmental Services is prioritizing the removal of this dam, which plays a central role in community identity, over other structures that may present fewer community impacts.

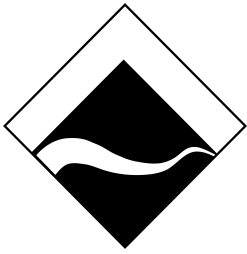
In addition to these overarching concerns, several statements in the proposal appear unclear or overstated, and we respectfully request clarification:

#### **1. Aquatic Connectivity Figures**

- The application states that removal will restore *311 miles of aquatic connectivity* within the Piscataquog River watershed. Based on our review, the true figure appears to be closer to **35 miles**, as multiple barriers remain in the watershed, including dams at Parker Station (North Branch), in New Boston (Middle Branch), and likely in the South Branch, as well as smaller dams on Bog Brook and Whittle Brook. We request that the Applicant provide a transparent accounting of how the 311-mile figure was calculated.

#### **2. Upstream/Downstream Connectivity Estimates**

- The proposal also claims that removal, in conjunction with other projects, will provide *250 miles of upstream connectivity and 49 miles downstream*. We question whether these estimates are achievable, as they rely heavily on downstream projects such as the Kelley Falls fish ladder and Glen Falls trap and transport facility—projects for which significant funding has not yet been secured.



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### 3. **Ecological and Functional Benefits**

- The application indicates that removal will improve water quality, sediment/nutrient flow, flood resiliency, storage capacity, shoreland stabilization, habitat connectivity, and recreation. We ask what specific studies or site-specific data support these conclusions. Without measurable, local evidence, it is difficult to determine whether this project is the best use of ARM resources.

### 4. **Community and Recreational Impacts**

- The Hadley Falls Dam and its impoundment are central to Goffstown's recreation, scenery, and identity. The dam supports cultural and community activities, including the annual Pumpkin Regatta, which attracts thousands of visitors. Even the application acknowledges that the recreational benefits of the existing dam most likely outweigh those of restored floodplain access.

For these reasons, and after careful consideration, the Committee cannot support the proposed removal of the Hadley Falls Dam. We believe the negative impacts on recreation and the Goffstown community outweigh the potential ecological benefits described in the application.

Thank you for your attention to these concerns. We respectfully request that the Department address these questions in detail before this proposal is advanced further in the ARM Fund process.

Respectfully,

*Jane Beaulieu*

Jane Beaulieu  
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### Cc:

Derek Horne, Town Administrator, Goffstown, NH