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Via Electronic Mail Only
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Town of Effingham Planning Board
c/o Theresa Swanick, Chair
68 School Street
Effingham, N.H. 03882

Re: Site Plan Application for Meena, LLC

Dear Board Members:

I write on behalf of my client, Meena, LLC (“Meena”), relative to the most recent correspondence dated August 12, 2022 that you received from Attorney Biron Bedard on behalf of his clients.

On or before the Special Meeting scheduled for August 22, 2022, my client will address the technical issues raised by Attorney Bedard in his letter. With respect to Attorney Bedard’s request to allow Robert Newton a designated period of time to testify, Meena objects to such a request. Mr. Newton is not an abutter and has no standing to testify or be heard regarding any aspects of this case. The Planning Board already has a consulting engineer, Northpoint Engineering, LLC (“Northpoint”), to advise the Planning Board on technical matters. Meena also objects to the request that Northpoint attend the hearing. That is not the role of a consulting engineer and this is not a cost that should be borne by the applicant. If the Planning Board wishes for Northpoint to attend the hearing in person, the Planning Board should pay for that time, not Meena.

Meena also objects to the submission of the petition requested by Attorney Bedard. That petition has no bearing on the analysis and obligations of the Planning Board in reviewing a site plan. The petition appears designed to improperly inject politics into what should be an objective site plan review process. The Planning Board should not accept the petition as a document relative to the site plan application as it has no bearing on the application.

Thank you in advance for considering these positions. We look forward to speaking with you more fully at the Special Meeting on August 22, 2022.

Very truly yours,

/s/ Matthew R. Johnson

Matthew R. Johnson
MRJ/dmp
cc: Biron L. Bedard, Esq. (bbedard@ranspell.com)

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