



Bethlehem Conservation Commission
Bethlehem, New Hampshire

October 11, 2020

NHDES Wetlands Bureau
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Re: NHDES File Number 2020-02239

Dear Wetlands Bureau:

The Bethlehem Conservation Commission is expressing its concerns about this project and is asking the Department of Environmental Services to take a particularly close look at this application based on past experiences on a different project (proposed landfill) but with the same landowner on a project (a dragstrip) in an adjacent area. Part of this proposed landfill in Dalton, is in the Town of Bethlehem (Tax Map #406, Lots # 1 and 2).

Our Commission has attached letters we sent to DES on December 21, 2008, December 14, 2009 and December 23, 2016, in addition to a letter from the Dalton Conservation Commission on November 19, 2009.

A big concern at that time was over growing wetlands impacts, which increased from 1,762 to 1,920 to 6,650 sq. ft seemingly because they were never fully delineated. In 2009 the Army Corps of Engineers mapped the proposed site and found the area of impacted wetlands was significantly greater than it was portrayed in the original application.

This current proposed project is described as having a permanent impact of 16.3 acres of wetlands, as well as approximately 150 linear feet of perennial stream and 1350 linear feet of intermittent stream impact.

We are expressing concern over this location for a number of reasons.

Two branches of Alder Brook run alongside the proposed site of the 180-acre landfill, then join and flow out of Dalton into Littleton and then back into Bethlehem and into the Ammonoosuc River, a protected river. Disruptions and impacts there could result in run-off into Alder Brook and, therefore, into the Ammonoosuc. There are Alder Brook wetlands to consider and there is a stratified-drift aquifer in the area of Alder Brook Road and the Ammonoosuc, which continues under Wing, Hazen and River roads and then continues under Trudeau Road and the NCS landfill. A copy of the Bethlehem aquifer map is attached.

The two lots in Bethlehem are designated as Supporting Landscape to Highest Ranked Habitat, according to the NH Wildlife Action Plan; and the Alder Brook shoreline has been identified as a Highest Ranking Habitat in New Hampshire.

The members of the Ammonoosuc River Local Advisory Committee voted, at their meeting on September 25, to oppose the siting of this proposed landfill in this location for these reasons and more in a letter to DES of October 1, 2020.

We are asking DES to take all of these issues into account when deciding on this project.

Sincerely,

Lindsay Webb, Chair, Bethlehem Conservation Commission

***Bethlehem Conservation Commission
Bethlehem, New Hampshire***

Attachments:

BCC letter, December 21, 2008

BCC letter, December 14, 2009

DCC letter, November 19, 2009

BCC letter, December 23, 2016

Aquifer Map of Bethlehem, New Hampshire