

N.H. Department of Environmental Services

Wetlands Bureau Craig.rennie@des.nh.gov

RE: *NHDES File Number: 2020-02239 Wetlands Standard Permit Application*

Dear Mr. Rennie,

The Dalton Conservation Commission (DCC) is sending this letter in regard to Wetlands Permit Application (#2020-02239) submitted by Casella Waste Management/Granite State Landfill LLC. Please make this letter part of your record in this Application.

The DCC has retained a New Hampshire Certified Wetland Scientist (CWS) to review the application. A site visit was conducted at the site of the proposed landfill on January 8, 2021. At the time, the ground was frozen and covered with snow which made the evaluation of wetlands difficult.

Based on the information in the application materials submitted to date, the initial site visit with our CWS, and our preliminary review, the DCC has the following significant concerns:

- Several wetland areas on the property have been dredged or filled, without necessary permits, for road construction and possibly earth resource extraction. These unauthorized activities were acknowledged by Casella's wetland consultant.
 - **The DCC requests that outstanding violations be resolved and the site brought into compliance with all statutory authorities (e.g., wetlands, alteration of terrain and Corps permitting) before any new permitting is allowed to proceed.**
- **Impact to wetlands and other aquatic resources:**
 - **Direct impact** (dredge and fill) to wetlands and other aquatic resources (e.g., streams and vernal pools) will be major and as yet not clearly quantified by an independent source.
 - **Indirect impact** to other aquatic resources, including streams and wetlands down-gradient, has also not been determined and we must therefore, rely on the data submitted by the applicant.
 - It is likely that past and future changes in the watershed (e.g., the removal of vegetation and construction of detention basins) will increase surface water temperatures which may have significant adverse effects on some of the Highest Ranked Habitat in New Hampshire (Alder Brook Wetlands Complex) and Highest Ranked Habitat in the Biological Region.
 - **The resources mentioned above, as well as the Ammonoosuc River and Forest Lake State Park are important to the residents of Dalton and surrounding communities as they have significant wildlife, fisheries, tourism, and recreational values.**
- **Cumulative impacts from the proposed landfill and by other past, present and reasonably foreseeable future actions (e.g., earth resource extraction, development of an industrial park, racetrack and other activities) are very significant.**

Since the cumulative impact is so large, we respectfully request that the search for an offsite alternative be expanded.

The DCC recommends that the Granite State Landfill Wetlands Permit Application be denied due to the significant and severe impact on valuable wetlands, some of the "highest ranked" wildlife habitat in the State, and other important aquatic resources. In addition to adversely affecting these resources, we are also concerned the project will diminish the value of other resources including the Alder Brook complex, the Ammonoosuc River, and Forest Lake all of which have significant wildlife, fisheries, tourism, and recreational values that are essential to the economy of the region.

Respectfully,

Dalton Conservation Commission

Nancy Comeau, Chair

Nancy Comeau 2-16-21

- Christine Rouillard
- Mike Noel
- Ernie Hannaford
- Traci Wagner
- Ruth Duval