



July 28, 2021

David Price, Wetlands Bureau Regional Supervisor
Stefanie Giallongo, Wetlands Regional Permitting Specialist
State of New Hampshire Department of Environmental Services Water Division
29 Hazen Drive, PO Box 95
Concord, NH 03301

RE: NHDES application 2020-02239

Dear Mr. Price and Ms. Giallongo:

Thank you for the opportunity to comment on NHDES application 2020-02239. NH LAKES urges the New Hampshire Department of Environmental Services to deny the permit application for the proposed landfill in Dalton, New Hampshire. All landfills pose considerable threats to surface and ground water quality which need to be carefully and intentionally considered when siting and permitting. This project in particular, with its proximity to Forest Lake, Forest Lake State Park, and surrounding crucial wetland habitats threatens to undermine the core purposes of public lands protection and conservation and must be denied.

NH LAKES is a statewide non-profit organization dedicated to keeping New Hampshire's lakes clean and healthy, and advocates for laws, public policies and other programs designed to achieve this mission. We work with partners, promote clean water policies and responsible use, and inspire the public to care for our lakes. We base our work in science – watershed hydrology included – and on the premise that no lake is an island. Lake water comes not only from rainfall and snowmelt, but also from overland flow, through the ground, and by way of streams and other lake tributaries. Despite Casella's assertion that Forest Lake is not within the drainage or watershed of this project, NH LAKES knows that siting landfills within the drainage area of any lake or stream increases the threat to lake water quality and can negatively impact the long-term health of that waterbody.

NH LAKES is concerned about numerous threats to water quality that a new landfill could pose. Wetlands are essential natural filters and crucial to protecting water quality and lake health. The numerous acres of wetlands that would be dredged and filled and the vernal pools destroyed to create this landfill site are of significant concern to NH LAKES. In addition, the potential introduction of toxic landfill leachate to any body of water can have catastrophic consequences to water quality and are of particular threat to Forest Lake, Burns Pond, the Alder/Hatch/Bog Brook watersheds, and the Ammonoosuc River. Leachate and other landfill related pollutants could cause toxic cyanobacteria blooms and compromise the health of both humans and wildlife. Casella's track record preventing and

managing leachate spills and other environmental violations in New Hampshire is troubling and the risk to the surrounding watershed is unacceptable.

NH LAKES urges NHDES to deny this permit in an effort to ensure that new landfills are not sited in close proximity to fragile public lands and important watershed, thereby supporting the investments New Hampshire has made in these important natural, recreational, cultural, and economically-important areas. Permitting a landfill would damage surface and groundwater, negatively impact the state's vital outdoor recreation and tourism industries.

Respectfully,

A handwritten signature in blue ink, appearing to read 'MD', is centered below the text 'Respectfully,'.

Michelle Davis, Advocacy Program Coordinator
NH LAKES
mdavis@nhlakes.org