



CLEVELAND, WATERS AND BASS
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February 6, 2025

VIA EMAIL TRANSMISSION
CONFIRMING COPY VIA U.S. MAIL

Wetlands Council (appeals@des.nh.gov)
Attention: Michelle Doucette, Appeals Clerk
c/o NH Department of Justice
1 Granite Place South
Concord, NH 03301

Re: Docket #24-21 WtC
Dalton Conservation Commission

Dear Clerk Doucette:

Enclosed for filing please find an Assented-to Motion to Intervene of Granite State Landfill, LLC.

Thank you for your assistance in this matter.

Very truly yours,

/s/ Jacob M. Rhodes

Jacob M. Rhodes, Esq.

/Enc.

cc: (by email only)
Joshua Harrison, Esq., NH Department of Justice
Keely Lovato, Esq., NH Department of Justice
Laura Maynard, Esq., NH Department of Justice
Jeremy D. Eggleton, Esq. / Mary McFall

STATE OF NEW HAMPSHIRE
DEPARTMENT OF ENVIRONMENTAL SERVICES
WETLANDS COUNCIL

Docket No. 24-21 WtC

In re: Appeal of Dalton Conservation Commission

**ASSENTED-TO MOTION TO INTERVENE
OF GRANITE STATE LANDFILL, LLC**

Granite State Landfill, LLC (“GSL”) respectfully moves the wetlands council to allow it to intervene and participate fully as a party in the above-captioned appeal pursuant to Ec-Wet 203.08 and RSA 541-A:32.

Under RSA 541-A:32, GSL must show that its rights and interests may be affected by the outcome of the proceeding and that the interests of justice would not be impaired. RSA § 541-A:32, I. This appeal arises out of a Shoreland Impact Permit granted to GSL by the State of New Hampshire Department of Environmental Services (“NHDES”) on or about July 18, 2024. The Dalton Conservation Commission (“DCC”) filed a preliminary notice of appeal on or about August 5, 2024. GSL is the real party in interest as it was a party to the permit application and permitting decision. GSL’s rights in the permit will be directly affected by the outcome of this appeal. Under RSA 541-A:32, GSL is entitled to intervene and participate fully as a party in this appeal as its rights and interests will be affected if the DCC is successful. Allowing GSL to participate fully as a party furthers the interests of justice and will assist the wetlands council in determining the issues in this appeal, particularly where GSL’s participation would be required regardless of its status as an intervenor.

NHDES and the DCC both assent to the relief requested herein.

Respectfully submitted,

GRANITE STATE LANDFILL, LLC,

By Its Attorneys,
CLEVELAND, WATERS and BASS, P.A.,

Dated: 2/6/2025

By: /s/Jacob M. Rhodes
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CERTIFICATION

I, Jacob M. Rhodes, hereby certify that on February 6, 2025, I filed the foregoing document with the appeals clerk by way of email and regular mail and served a copy by way of email upon all persons listed on the service list for this appeal.

/s/ Jacob M. Rhodes
Jacob M. Rhodes, Esq.