



THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF TRANSPORTATION



Victoria F. Sheehan
Commissioner

COPY

William Cass, P.E.
Assistant Commissioner

April 14, 2023

Granite State Landfill, LLC
Attn: John Gay
1855 Vermont Route 100
Hyde Park, VT 05655

**RE: Request for More Information – Driveway Permit Application #14656
Granite State Landfill Development at Douglas Drive
NH-116, Bethlehem & Dalton**

Dear Applicant:

The Department has completed a review of the information you provided on June 8, 2022 in response to District's January 26, 2022 comment letter for the proposed landfill project located at Douglas Drive off NH-116 in Bethlehem and Dalton, NH.

The following comments have been generated as a result the Department's recent review:

1. District requested Hunter Farm Road (Class VI) be consolidated with Douglas Drive. The line of sight from Hunter Farm Road is approximately 475 feet and limited by the vertical curvature of state highway between the two driveways. If haul trucks decide to access I-93 through Littleton, the location of Hunter Farm Road (1,070' +/- south of Douglas Drive) is likely within the truck acceleration limits. It is recommended that presence and use of this driveway be noted in the Traffic Study and note if it has any impact on safety or the functional areas of Douglas Drive.
2. The Applicant did not provide traffic estimates or trip generations for the existing land uses (concrete & asphalt plant, dragstrip, etc) listed on the application or provide any adjustment for seasonal variations for land uses in operation (i.e. gravel pit) with the off-peak traffic counts provided for Tuesday May 18, 2021.

District requests the applicant provide traffic data for at least three weekdays and one weekend, complete with trip estimates for the existing land uses not built or in operation, to better understand the existing and proposed traffic conditions at the Douglas Drive intersection. Seasonal variations for gravel pit traffic may be estimated using historical data from scale house and/or from the annual gravel reports provided to the Town.

Driveway permits are issued to the landowner and only includes the land uses listed on the application. The applicant should provide a comprehensive list of land uses which use Douglas Drive, including previously permitted uses. Any future plans by the landowner (campground, industrial park, etc) should be considered in the Traffic Study, especially if there are overlapping construction schedules. Any additional development, expansion or change in land

use after a permit is issued will require reapplication to the Department and an updated Traffic Study. Clarification on land uses and related traffic has been mentioned in previous District correspondence.

Also, NHDOT Traffic's review of Page 2 of the study states the landfill opening and future years are 2026 and 2036 respectively. In the subsequent sections, years 2028 and 2038 are used. There is no documentation stating the analysis years have been updated. Please confirm opening and future years are consistent within the Traffic Study.

3. The applicant did not address how damage (rutting) from haul trucks often parking along the highway shoulder and the interstate on/off ramps will be discouraged while waiting for the landfill facility to open. The Applicant's response indicated Casella will provide drivers with a restroom and coffee & water at the Bethlehem landfill facility located at 581 Trudeau Road, Bethlehem, NH, and the proposed landfill will provide staging along Douglas Drive within one hour prior to the facility opening. The hours of operation were not provided for either landfill facility or a discussion on how driver behavior will change, specifically to discourage trucks from parking along the highway outside landfill operating hours.
4. District is not comfortable with the self-imposed and enforced truck route proposal. District insists that the traffic study be adjusted to redistribute traffic volumes along the shortest truck route available. The Department views all state highways accessible to trash haul vehicles and District would not restrict haul vehicles on sections of state highway as a condition of a driveway permit.

District's position has been that the shortest haul route is the most likely route for haul vehicles traveling to and from the proposed landfill. The driveway layout, traffic study and any mitigation should review the possibility of the shortest route being used.

Casella's driveway layout, traffic study and mitigation package is based on a self-enforced proposal which is about 22 miles longer from the North at Exit 42 and over 9 miles from the South at Exit 35 according to Google Maps and is not the shortest route.

From the North on I-93

Applicant's Proposal	
Exit 40 Bethlehem through Carroll/Whitefield/Bethlehem	29.7 miles
Shortest Route	
Exit 42 Littleton through Littleton to Bethlehem	7.5 miles

The Applicant's Proposal is about 22 miles longer than Shortest Route available to trucks.

From the South on I-93

Applicant's Proposal
Exit 35 Franconia through Franconia/.../Whitefield/Bethlehem 25.0 miles

Shortest Route
Exit 41 Littleton through Littleton to Bethlehem 15.4 miles

The Applicant's Proposal is over 9 miles longer than Shortest Route available to trucks.

5. District recommends the applicant provide available photographs and dimensions of the common truck sizes currently using Casella's Bethlehem landfill facility and described in the Traffic Study.
6. Consider providing photos, cleaning procedures, inspection reports or other documentation of the successful cleaning practices by the truck owners as described in the response letter by the Department officials. District is concerned with loose debris blowing out of empty trucks along the state highway.
7. The traffic study shows nearly doubling heavy truck traffic along the proposed truck haul route on US-3 & NH-116 based on three days (7/7/2009 to 7/9/2009). District requests additional counts or documentation to determine if the 2009 traffic baseline is representative of current traffic characteristics along haul routes.
8. The Traffic Study provides 2019 Casella Bethlehem Traffic Volume Estimates under pre-COVID-19 conditions. District requests historical volumes be evaluated to identify any variations and confirm 2019 is a representative estimate of traffic to and from Casella's Bethlehem facility. TYLIN Traffic Study states 102 trips/day generated and is 25% more than Casella Bethlehem.
9. The TYLIN Traffic Study provides an average number of trucks per month. The applicant should provide supporting calculations on how peak hour (13 vehicles per hour) was determined.
10. The Department requests the applicant remove the proposed wall and guardrail and provide fill slopes along the proposed acceleration lane on NH-116. The land adjacent to this portion of state highway is NHDOT Rail right of way. This was requested previously by the Department.
11. The Department requests the proposed Douglas Drive layout be adjusted, if possible, to reduce the wide paved opening by including islands shown in Figure VI of the NHDOT Driveway Policy so that haul trucks entering from the north and exiting to the south can utilize slip lanes with the deceleration and acceleration lanes. This information was requested in previous District correspondence.
12. The Traffic Study included field measurements based on height of eye of 7.6 feet (a truck) to a height of 3.5 feet. Given the vertical geometry to the south (crest), District requests the

Applicant confirm the sight lines and sight distances from Douglas Drive meet or exceed 400 feet at a height of 3'-9" to 3'-9" as described in the Driveway Policy.

13. District requests removal of any connections of private drain pipes to state drainage. All private drainage structures shall remain within the property and any overland or concentrated flows directed to state drainage should match existing flow conditions.

Several items in this letter were requested previously and have not been adequately addressed to issue a permit. Please note that if the items are not sufficiently addressed it will result in denial of the application.

Once our office has received all the requested information, we will continue the review of the application and supporting information. If additional information or further modifications to the plan are needed as a result of our review, we will send supplementary notifications describing the required items. The application is classified as incomplete at this time. Thank you for your cooperation during the review process. If you have any questions, feel free to contact this office.

Sincerely,



James McMahon III, P.E.
Assistant District Engineer
NHDOT District One
603-788-4641

cc: Landowner, Douglas Ingerson
TYLIN International, Thomas Errico, P.E. (email)
Town of Bethlehem, Planning (email)
File