



GRAFTON COUNTY COMMISSIONERS

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March 26, 2024

Robert Scott, Commissioner
New Hampshire Department of Environmental Services
29 Hazen Drive
Concord, NH 03302-0095
robert.scott@des.nh.gov
(Via Email Only)

Subject: NCES Landfill, Granite State Landfill (GSL) Development

Dear Commissioner Scott:

The Grafton County Commissioners write to share concerns about several issues brought to our attention by citizens in Grafton County, which include the following:

- Widespread PFAS groundwater contamination within the watershed of the Ammonoosuc River at the NCES Landfill in the Town of Bethlehem, in Grafton County
- PFAS-contaminated surface water runoff from the NCES Landfill property directly entering the Ammonoosuc River, including PFOA, which the EPA is proposing to be deemed a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund
- Costs to the Town of Bethlehem, Grafton County, and the State of New Hampshire, relative to PFAS remediation at the NCES Landfill
- Negative impacts to the North Country tourism and outdoor recreation industries as a result of the stigma associated with the ongoing contamination issue at the NCES Landfill, as well as the potential for that facility to become a Superfund site
- Health impacts to the public, particularly those who utilize the Ammonoosuc River for outdoor activities such as swimming and fishing in the vicinity of the NCES Landfill
- The site access road for the proposed Granite State Landfill (GSL) development project at Douglas Drive and Route 116 is located in the Town of Bethlehem, in Grafton County. This development represents a significant “change of use” for this property at this location. While the developer has maintained that local approvals are not required, the developer is legally obligated to seek approvals under the site plan review regulations of the Town of Bethlehem, in order to “provide for the safe and attractive



COMMISSIONERS

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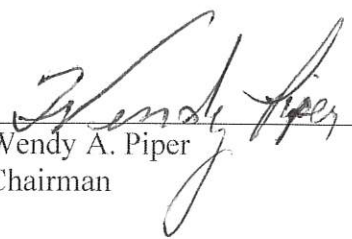
- *development or change or expansion of use of the site and guard against such conditions as would involve danger or injury to health, safety, or prosperity.”¹*
- The introduction of a significant amount of heavy-duty, trash-related vehicular traffic (102 trips, each way, per day, Monday-Saturday) through town centers, destined for Douglas Drive and Route 116, poses a significant threat to the safety and well-being of pedestrians, commuters, and tourists
- The GSL project would be the second commercial landfill sited in Grafton County, the second commercial landfill sited along the Ammonoosuc River, and the second commercial landfill sited upstream of the Town of Littleton. There are valid concerns that this development will have far-reaching, negative impacts, not only to the environment, but also to public health and safety, property values, quality of life, the rural character of the North Country, and our vitally-important tourism and outdoor recreation industries
- The potential for ground and surface water contamination within the vicinity of the proposed GSL development, particularly from PFAS compounds so prevalent within the waste stream, is a risk we find unacceptable and one we would prefer to avoid. This is an area, tested by both property owners and the GSL developer, currently free of such contamination
- The proposed GSL development will disturb approximately 148 acres of forested wildlife habitat, will add 25 acres of impervious surface, destroy 11.5 acres of wetlands, and have adverse effects on both Alder Brook and the Ammonoosuc River, particularly due to the loss of wetlands and the very important role they play in reducing the severity of downstream flooding, which has been problematic in the Town of Littleton and other downstream communities in Grafton County

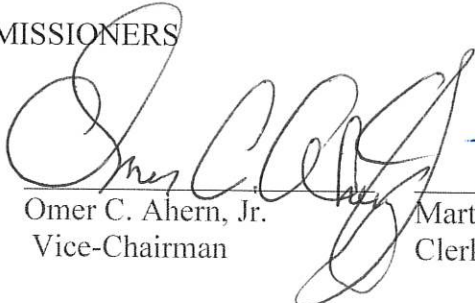
In closing, we concur with the reports submitted to NHDES by both the Bethlehem and Dalton Conservation Commissions, and we urge NHDES and NHDOT to deny the wetlands permit application, NHDES File Number: 2023-03259, and the driveway permit application, NHDOT File Number: 14656, for the GSL Landfill Project.

Thank you for your attention to these matters.

Respectfully,

GRAFTON COUNTY COMMISSIONERS


 Wendy A. Piper
 Chairman


 Omer C. Ahern, Jr.
 Vice-Chairman


 Martha S. McLeod
 Clerk

¹ Bethlehem Site Plan Regulations

Cc:

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