

Ammonoosuc River Local Advisory Committee – Comments presented at Public Hearing
Granite State Landfill, LLC, Subject Property: Douglas Drive, Dalton and Bethlehem, NH;
Dalton Tax Map/Lot 406-1 (M405-33, 406-1, 406-2.1, 406-2.3,2.4,2.5, 406-3), and Bethlehem
Tax Map/Lot (406-1, 406-2); (NHDES File# 2020-02239) July 14, 2021

Good afternoon. I am Richard Walling, Chair of the Ammonoosuc River Local Advisory
Committee.

The New Hampshire General court passed the Rivers Management and Protection Act
(RSA 483) in 1988. The 44.8-mile segment of Ammonoosuc River, from the White Mountain
National Forest, boundary near Lower Falls in Carroll, to the confluence with the Connecticut
River in Haverhill was enrolled in the NH Rivers Management and Protection Program in 2007.
The upper reach of the river to its source at the Lake of the Clouds was designated in 2009.

The Ammonoosuc River Local Advisory Committee (LAC) has provided three letters of
comment to the NHDES relevant to the proposed Solid Waste Landfill that is the subject of
today's hearing. In comments provide specific to NHDES File #2020-02239, (Standard Dredge
and Fill Wetlands Application for the proposed landfill in Dalton and Bethlehem,) LAC
members noted their concerns about environmental impact to the site selected for the landfill,
being uphill of the Ammonoosuc River and that the headwater streams on the hillside are highly
interconnected with ground water, feeding into the Hatch Brook-Alder Brook tributary, a
perennial stream complex that flows into the Ammonoosuc River just a short distance upstream
of Town of Littleton.

Some of the submitted observations and concerns are:

- ✎ Disturbance to the well-functioning wetland complex
- ✎ Disturbance to Alder Brook fishery managed to protect wild brook trout (catch & release)
- ✎ Disturbance to rainbow trout and brown trout fishing in the Ammonoosuc River
- ✎ Alder Brook has Highest Ranked Wildlife Habitat in NH in 2020 Wildlife Action Plan
- ✎ 5 Vernal Pools on the property are a priority resource that need to be protected
- ✎ Ammonoosuc River is source of drinking water downstream in Woodville and in Lisbon with river's proximity to the Lisbon town wells
- ✎ As reported in the Ammonoosuc River Geomorphic Assessment, Floodplain Conservation, and River Corridor Planning by Dr. John Field, October 2011, Fluvial Geomorphology indicates very high fluvial erosion zone in this reach of the river
- ✎ topography directs drainage flow from the site down to the river
- ✎ Runoff drainage from impervious gravel area on the site would also flow downhill
- ✎ Screening landfill from the public view and noses of tourists, could be a challenge for the proposed location

NHDES File #2021-52265 Application/Standard Solid Waste Landfill in Dalton Volume 1,
Section V – Site Report, Attachment 2(V) – Compliance with Solid Waste Rules, page 7,
addressing ENV-SW 804.03 Surface Water Protection Standards, the applicant states: **(QUOTE)**
“Phase I of the landfill has been designed such that the limit of the landfill is greater than 200
feet upgradient and 100 feet downgradient from wetlands...A Standard Dredge and Fill

Wetlands Application has been filed for this project for filling of 17 acres of wetlands. The new wetland limits after filling will provide the required separation...” (CLOSE QUOTE)

The Ammonoosuc River Local Advisory Committee (LAC) is particularly concerned about the attempt to absolve the distance requirement of a proposed new solid waste landfill from an important functioning wetland complex by applying to the NHDES to fill 17 acres of wetland.

Considering factors of topography, natural resources, socio-economics, and safety, the LAC members in attendance were in accord that selection of the landfill location should be based on criteria related to the environmental and hazardous material management. It is recommended that the Dalton site selected for the new landfill does not appear to be a suitable location for multiple reasons. In addition, the Ammonoosuc River having been selected for two landfill sites (existing landfill in Bethlehem and proposed site in Dalton) makes it seem like the responsibility has unduly been put on one river to carry the landfill burden, which is unfair to the downstream communities.

Thank you for providing this opportunity to speak to the concerns previously expressed by the members of the Ammonoosuc River LAC.

Richard Walling 7/14/21