



Bethlehem Conservation Commission
Bethlehem, New Hampshire

October 11, 2020

NHDES Wetlands Bureau
29 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

Re: NHDES File Number 2020-02239

Dear Wetlands Bureau:

The Bethlehem Conservation Commission is expressing its concerns about this project and is asking the Department of Environmental Services to take a particularly close look at this application based on past experiences on a different project (proposed landfill) but with the same landowner on a project (a dragstrip) in an adjacent area. Part of this proposed landfill in Dalton, is in the Town of Bethlehem (Tax Map #406, Lots # 1 and 2).

Our Commission has attached letters we sent to DES on December 21, 2008, December 14, 2009 and December 23, 2016, in addition to a letter from the Dalton Conservation Commission on November 19, 2009.

A big concern at that time was over growing wetlands impacts, which increased from 1,762 to 1,920 to 6,650 sq. ft seemingly because they were never fully delineated. In 2009 the Army Corps of Engineers mapped the proposed site and found the area of impacted wetlands was significantly greater than it was portrayed in the original application.

This current proposed project is described as having a permanent impact of 16.3 acres of wetlands, as well as approximately 150 linear feet of perennial stream and 1350 linear feet of intermittent stream impact.

We are expressing concern over this location for a number of reasons.

Two branches of Alder Brook run alongside the proposed site of the 180-acre landfill, then join and flow out of Dalton into Littleton and then back into Bethlehem and into the Ammonoosuc River, a protected river. Disruptions and impacts there could result in run-off into Alder Brook and, therefore, into the Ammonoosuc. There are Alder Brook wetlands to consider and there is a stratified-drift aquifer in the area of Alder Brook Road and the Ammonoosuc, which continues under Wing, Hazen and River roads and then continues under Trudeau Road and the NCS landfill. A copy of the Bethlehem aquifer map is attached.

The two lots in Bethlehem are designated as Supporting Landscape to Highest Ranked Habitat, according to the NH Wildlife Action Plan; and the Alder Brook shoreline has been identified as a Highest Ranking Habitat in New Hampshire.

The members of the Ammonoosuc River Local Advisory Committee voted, at their meeting on September 25, to oppose the siting of this proposed landfill in this location for these reasons and more in a letter to DES of October 1, 2020.

We are asking DES to take all of these issues into account when deciding on this project.

Sincerely,

Lindsay Webb, Chair, Bethlehem Conservation Commission

***Bethlehem Conservation Commission
Bethlehem, New Hampshire***

Attachments:

BCC letter, December 21, 2008

BCC letter, December 14, 2009

DCC letter, November 19, 2009

BCC letter, December 23, 2016

Aquifer Map of Bethlehem, New Hampshire



For a thriving New England

CLF New Hampshire 27 North Main Street
Concord, NH 03301
P: 603.225.3060
F: 603.225.3059
www.clf.org

February 2, 2021

Via Electronic Mail

The Hon. Howard Pearl, Chair
Environment and Agriculture Committee
N.H. State House
Concord, NH 03301

RE: HB 177, An act to prohibit the siting of new landfills, excluding expansions of existing landfills, near state parks.

Dear Chairman Pearl and Honorable Committee Members:

Conservation Law Foundation (“CLF”) appreciates the opportunity to comment on HB 177, an act to prohibit the siting of new landfills within two miles of a state park. CLF is a non-profit environmental advocacy organization working to protect the environment and promote healthy communities in New Hampshire, and across New England. CLF’s Zero Waste Project works to address unsustainable and polluting waste management practices and promotes proven waste management solutions like source reduction, reuse, recycling, and composting.

CLF writes to offer our support for HB 177. HB 177 is a commonsense measure that will protect New Hampshire’s state parks by imposing a minimum two-mile buffer between these important public resources and prospective landfills. This buffer is critical because landfills always negatively impact the surrounding communities and environments.

If landfills are permitted to be constructed and operated within two miles of state parks, visitors to those parks can be expected to endure negative impacts, including noxious odors, airborne dust and debris, and increased noise pollution. An increased amount of truck traffic will service the landfill, with the associated air pollution and traffic impacts reaching well beyond the immediate vicinity of the landfill. Depending on the size of the landfill, upwards of one hundred trucks per day can be expected. In some instances, landfills may even be visible from state parks, greatly reducing the natural viewsheds that are essential to experiencing and enjoying state parks.

Even after a landfill closes, it will still perpetually threaten the surrounding area. Landfills, even those that only accept municipal solid waste, are known to contain dangerous substances like volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), heavy metals, radioactive material, and pharmaceuticals. There is increasing concern regarding the levels of PFAS in landfills, forever chemicals that must be handled with the utmost care to protect public health and ensure clean and safe drinking water and groundwater. These pollutants are a concern



because all landfills eventually leak.¹ While the liner system placed under the buried waste is supposed to prevent leakage, these systems deteriorate over time. Once these liners fail, the landfill leachate will begin polluting the surrounding groundwater indefinitely, as there is no way to repair the liners after the landfill is constructed.

For these reasons, CLF supports HB 177. However, CLF is concerned that New Hampshire is not responding to the larger waste management issues that are driving attempts to new landfill capacity. In 1990, to “conserve the precious and dwindling natural resources” of New Hampshire, the legislature established two interdependent objectives.² First, it created a hierarchy of waste management methods that favors source reduction, recycling, reuse, and composting over waste disposal, and that ranks landfilling as the least preferable option. RSA 149-M:3. Second, the legislature established a solid waste reduction goal, aimed to divert 40% of waste destined for landfills by 2000, through a combination of reduction, recycling, reuse, and composting. RSA 149-M:2. To achieve this goal that is 21 years overdue, New Hampshire must begin to implement policies that disfavor landfills and promote environmentally beneficial methods of waste reduction and management already reflected in state law.

New Hampshire is falling behind our neighbors, and as a result we have become a dumping ground for their waste. In 2019, the six operating landfills in New Hampshire accepted 2,226,041 tons of waste, 49% of which came from out-of-state. Proposals for new landfills and landfill expansions are being fueled by out-of-state waste. The Massachusetts ban on landfilling construction and demolition debris provides a clear example. In 2006, Massachusetts banned several forms of construction and demolition debris from disposal in their landfills. While this has led to increased construction and demolition debris recycling and processing, the ban also resulted in many companies bringing their waste to New Hampshire. This system has increased the amount of out-of-state construction and demolition debris being disposed of in New Hampshire landfills.

As the 2019 Legislative Committee Report Studying Solid Waste noted, it is time to seriously address the waste management crisis and abandon a failed model that relies primarily on disposal. HB 177 represents a reasonable measure that will impose needed siting restrictions on landfills while safeguarding the use and enjoyment of New Hampshire’s state parks. Therefore, we urge the Environment and Agriculture Committee to support HB 177 and vote *ought to pass*.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Heidi Trimarco".

Heidi Trimarco, Staff Attorney
Conservation Law Foundation

A handwritten signature in blue ink, appearing to read "Peter W. Blair Jr.".

Peter Blair, Staff Attorney
Conservation Law Foundation

¹ U.S. Environmental Protection Agency, 1988, Federal Register, v. 53, no. 168, August 30, 1988, p. 33345.

² RSA 149-M:1

N.H. Department of Environmental Services

Wetlands Bureau Craig.rennie@des.nh.gov

RE: *NHDES File Number: 2020-02239 Wetlands Standard Permit Application*

Dear Mr. Rennie,

The Dalton Conservation Commission (DCC) is sending this letter in regard to Wetlands Permit Application (#2020-02239) submitted by Casella Waste Management/Granite State Landfill LLC. Please make this letter part of your record in this Application.

The DCC has retained a New Hampshire Certified Wetland Scientist (CWS) to review the application. A site visit was conducted at the site of the proposed landfill on January 8, 2021. At the time, the ground was frozen and covered with snow which made the evaluation of wetlands difficult.

Based on the information in the application materials submitted to date, the initial site visit with our CWS, and our preliminary review, the DCC has the following significant concerns:

- Several wetland areas on the property have been dredged or filled, without necessary permits, for road construction and possibly earth resource extraction. These unauthorized activities were acknowledged by Casella's wetland consultant.
 - **The DCC requests that outstanding violations be resolved and the site brought into compliance with all statutory authorities (e.g., wetlands, alteration of terrain and Corps permitting) before any new permitting is allowed to proceed.**
- **Impact to wetlands and other aquatic resources:**
 - **Direct impact** (dredge and fill) to wetlands and other aquatic resources (e.g., streams and vernal pools) will be major and as yet not clearly quantified by an independent source.
 - **Indirect impact** to other aquatic resources, including streams and wetlands down-gradient, has also not been determined and we must therefore, rely on the data submitted by the applicant.
 - It is likely that past and future changes in the watershed (e.g., the removal of vegetation and construction of detention basins) will increase surface water temperatures which may have significant adverse effects on some of the Highest Ranked Habitat in New Hampshire (Alder Brook Wetlands Complex) and Highest Ranked Habitat in the Biological Region.
 - **The resources mentioned above, as well as the Ammonoosuc River and Forest Lake State Park are important to the residents of Dalton and surrounding communities as they have significant wildlife, fisheries, tourism, and recreational values.**
- **Cumulative impacts from the proposed landfill and by other past, present and reasonably foreseeable future actions (e.g., earth resource extraction, development of an industrial park, racetrack and other activities) are very significant.**

Since the cumulative impact is so large, we respectfully request that the search for an offsite alternative be expanded.

The DCC recommends that the Granite State Landfill Wetlands Permit Application be denied due to the significant and severe impact on valuable wetlands, some of the "highest ranked" wildlife habitat in the State, and other important aquatic resources. In addition to adversely affecting these resources, we are also concerned the project will diminish the value of other resources including the Alder Brook complex, the Ammonoosuc River, and Forest Lake all of which have significant wildlife, fisheries, tourism, and recreational values that are essential to the economy of the region.

Respectfully,

Dalton Conservation Commission

Nancy Comeau, Chair

Nancy Comeau 2-16-21

- Christine Rouillard
- Mike Noel
- Ernie Hannaford
- Traci Wagner
- Ruth Duval



STATE OF NEW HAMPSHIRE
DEPARTMENT of NATURAL and CULTURAL RESOURCES
DIVISION of PARKS and RECREATION
172 Pembroke Road Concord, New Hampshire 03301
Phone: (603) 271-3556 Fax: (603) 271-3553
Web: www.nhstateparks.org

January 12, 2021

Mr. Rene Pelletier, Administrator
NH Dept. of Environmental Services
Water Division – Wetlands Bureau

Mr. Mike Wimsatt, Director
NH Dept. of Environmental Services
Waste Management Division
6 Hazen Drive – P.O. Box 95
Concord, NH 03302-0095

Re: Forest Lake State Park

Dear Mr. Pelletier & Mr. Wimsatt,

The Department of Natural and Cultural Resources (DNCR) has received a copy of the Request for more information for the standard Dredge and Fill Wetlands Permit Application (RSA 482-A NHDES File Number 2202-02239 subject Property: Douglas Drive, Dalton NH, Tax Map M405, Lot #33 dated November 18, 2020 made by Granite State Landfill LLC 1855 Vermont Rte. 100 Hyde Park Vt. 05655. We understand that Granite State Landfill LLC., will be required to submit application for additional permits such as Alteration of Terrain and those required by Waste Management. We have been following this project for some time and attended a Board of Selectman meeting to review a request for a lot line adjustment that would have created a 50 foot buffer eliminating DNCR as an abutter.

This letter is to express our concerns about the potential impacts of a landfill on Forest Lake State Park and request that our concerns be addressed under the applicable permits. DNCR is responsible for managing State Reservations (defined in RSA 227-G:2), including Forest Lake State Park for the following purposes under statute: **RSA 227-H:1 Declaration of Purpose:**

It is hereby recognized and declared that state-owned reservations contribute to the conservation of natural resources and distinctive quality of life in the state. The public welfare of this state is served by the prudent acquisition and management of reservations to provide forest benefits and for the purposes of demonstrating sound forestry principles, protecting habitat for plants, animals, and other organisms, conserving forested watersheds, preserving areas of rare and exemplary natural beauty and ecological value, and providing for perpetual public access and use.

Forest Lake State Park in Dalton, one of the ten original state parks created in 1935. The park spans 397 acres and its 200-foot sandy beach lies on the shore of Forest Lake. Popular activities in the park include swimming, picnicking, mountain biking, fishing, and boating. In addition, Forest Lake is one of the few parks that provides an opportunity to expand the park system further (pursuant to RSA 216-A:1) by developing a new campground. The current greatest recreational value of the Park is public access to the beach and the lake. Lake access is one of the key factors to our most successful campgrounds.

Last legislative session we provided testimony on **HB 1319 prohibiting the siting of new landfills or expansions of existing landfills near state parks, National Parks, or United States Department of Agriculture forest land**. In our testimony, we stated the following:

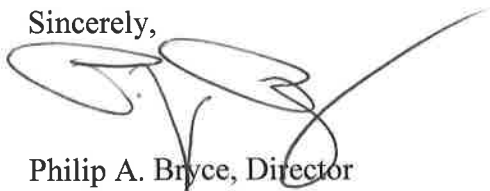
As an abutter to the proposed landfill, the Division would actively participate in the process established by the Department of Environmental Services to review the proposed project to ensure the project does not have an adverse impact on present and future use of the Park. We have concerns regarding the impact of noise, odors, and pest animals (seagulls) on our visitors today at the beach and our visitors in the future with the addition of a campground in another portion property, particularly if the campground is closer to the landfill.

More specifically, we are concerned as follows:

1. We have been told by Casella Waste that the proposed site for the landfill is not in the same watershed as Forest Lake. However, we are unclear if the groundwater systems under the site are shared with the Lake. We do not know the lifespan of the liner, if there is one, but the landfill would be there in perpetuity. We would not want the landfill to impact groundwater quality in the Lake and in the Park over the short term or any time in the future. How can we be assured that the landfill will not affect groundwater in perpetuity?
2. We are concerned about any negative impacts from the presence of trash on the surface. This includes trash blowing into the Park or being transported by animals into the park. We are also concerned that the landfill would increase nuisance activities from birds and other animals and pests. We do not know if odors will be noticeable anywhere in the Park, including trails and the in the location of the potential campground. How can we be assured that there will be no negative impacts on the park site or visitors resulting directly and indirectly from the trash?

Thank you for the opportunity to comment on this project. If we can provide any additional information, please let me know.

Sincerely,



Philip A. Bryce, Director

Cc: Sarah Stewart, Commissioner, DNCR
Kevin Roy, General Manager, Casella Waste Systems, Inc.



54 Portsmouth Street
Concord, NH 03301
Tel. 603.224.9945
Fax 603.228.0423
info@forestsociety.org
www.forestsociety.org

The Honorable Howard Pearl, Chairman
Committee on Environment and Agriculture
NH House of Representatives
Legislative Office Building, Room 303
Concord, NH 03301

February 2, 2021

Dear Mr. Chairman:

Thank you for this opportunity to express the Society for the Protection of New Hampshire Forests' support for House Bill 177, legislation proposing to prohibit the siting of new landfills near state parks.

One of New Hampshire's distinguishing traits is the State's deep natural beauty. This landscape, especially the forests and lakes, contributes to the environmental and economic health and well-being we enjoy. The protection and conservation of these open spaces is the result of a diverse partnership of public agencies, non-profit organizations and private citizens. We view the intent behind HB 177 as part of the State's responsibility to steward these natural resources for the long-term public good of all the residents of New Hampshire. Therefore, we wish to thank the bill's sponsors for their introduction and support of the bill.

Furthermore, as you know, in 2019 the Committee to Study Recycling Streams and Solid Waste Management in New Hampshire (HB 617 Study Committee) extensively studied how the State can better manage its solid waste stream. The Committee noted that state law (RSA 149-M) established a hierarchy of solid waste disposal solutions. The priority approach to this challenge is to reduce the amount of waste the State produces. The least preferred method is to dispose of it in landfills.

As the Committee considers HB 177, the Forest Society would also urge you to review the HB 617 Study Committee Report, particularly the report's recommendations. While the report makes clear the issue of solid waste management is complex, it also notes on page 7 that "land used for disposal has other worthwhile uses" and that "most solid waste, including much plastic, construction and demolition debris and innumerable other types of waste, remain entombed in perpetuity". Therefore, we hope the State will put in place policies which reduce the need for new landfills.

By incorporating such strategies, the State will better able to protect not only our state parks but the other special places which help to define New Hampshire. Thank you again for accepting this testimony.

Sincerely,

Matt Leahy, Public Policy Manager
Society for the Protection of NH Forests

January 10, 2021

To: wetlandsapplicationpubliccomments@des.nh.gov

CC: craig.rennie@des.nh.gov

From: Sugar Hill Conservation Commission

Subject: Wetlands Application #2020-02239

The Sugar Hill Conservation Commission is aware of the controversial wetlands permit application by Casella Waste Systems that will enable a new 137 acre landfill in the town of Dalton, New Hampshire. Stories and letters to the editor regarding this application have been in the local papers for months.

At this time, we would like to request that NHDES Wetlands **deny** permit # 2020-02239.

Our primary concerns are:

- 1) the destruction of wetlands, vernal pools, forest land and wildlife habitat, and
- 2) the negative and polluting impact on the Ammonoosuc River.

While there is no solid waste management plan for the state of New Hampshire, it seems reckless to rely on private industry to govern itself in a way that will protect our precious natural resources. This proposed new landfill is not necessary to meet the trash disposal needs of northern New Hampshire.

Mr. Craig Rennie
NHDES Wetlands Bureau
NH Dept. of Environmental Services
PO Box 95, 29 Haven Drive
Concord, NH 03302

January 11, 2021

RE: NHDES File #2020-02239

Dear Mr. Rennie

At our December 21, 2020 meeting the Littleton Conservation Commission reviewed and discussed the above wetlands permit application. At the same time, we reviewed correspondence from neighboring conservation commissions that they have submitted to your office to be included as part of this file.

Since a major part of a New Hampshire conservation commission's responsibility is directed towards protection of wetlands, this letter is a response to that specific impact that the proposed project would have on the proposed project area. At the same time, we acknowledge the fact that the proposed project would seriously impact the local communities in socio-economic and other ways.

Although the actual footprint for the landfill would lie in Dalton, the land parcel involved extends into several adjacent towns, including Littleton. Actually, the entire Alder Brook drainage flows into Littleton (Tax Map 36 Lot 17) from Dalton and merges with the Hatch Brook drainage (Tax Map 36 Lot18), crosses the Bethlehem town line, flows under NH RT 116 and enters the Ammonoosuc River. Map & Lot #'s, town line boundaries....we realize that none of this limits or affects the natural boundaries of wetlands, of surface or subsurface flow.

The wetland impact numbers for this proposed project are seriously large. 16+ acres, 150 feet perennial stream, 1350 feet intermittent stream, five vernal pools. In Littleton, the LCC has dealt with many wetland permits and the fact remains that even with such "tools" as compensatory mitigation, permanently impacted wetlands are destroyed wetlands. And when a project such as a landfill is involved, the destruction can travel far outside the landfill's footprint.

As found on the NHDES website, *“The mission of the NHDES is to help sustain a high quality of life for all citizens by protecting and restoring the environment and public health in New Hampshire. The protection and wise management of the state’s environment are the main goals of the agency.”*

Also on the website, *“The Water Division (of the NHDES) is tasked with protecting the numerous lakes, ponds and rivers in the state, as well as valuable groundwater.”*

As conservation commissioners and as citizens of New Hampshire, we concur with these mission statements that NHDES has set as their directive.

The Littleton Conservation Commission strongly opposes the approval of the landfill project involving NHDES File #2020-02239 and proposes that NHDES abide by its own mission statement to deny this project.

Thank you,

Tom Alt, Chair
Littleton Conservation Commission
125 Main St.
Littleton, NH 03561

House Environment and Agriculture Committee
NH Sierra Club Testimony on HB177

I am Jerry Curran, NH Sierra Club Chapter Chair and I live in Conway. The NH Sierra Club has over 20,000 members and supporters in New Hampshire. I ask the Environment and Agriculture Committee to support and pass HB177.

The NH Sierra Club strongly supports HB177. In talking with many of our supporters we have found unprecedented support for HB177. In fact, we have not heard a single dissenting voice. Like all states, New Hampshire has a trash problem, but it is not dire enough that we need to make every acre in the State available for landfills. We have enough room to landfill trash and still leave a buffer around State Parks.

Increasing recycling from it's present 25%, reducing excess packaging, a robust compost program, not allowing other states to dump in New Hampshire and reducing single use plastic would go a long way to decreasing our need for landfill space. New Hampshire's wild places during the pandemic have become more necessary and popular than ever. Our future is in tourism not trash. We can't have both.

The final size of a landfill project is often larger than what was originally proposed. The landfill in Bethlehem was not nearly as visible until the last expansion which added earth berms to raise the trash level to a much more visible height. In the case for the Forest Lake State Park, the final landfill could look very different from what is being proposed now. The ability of landfills to continue to expand beyond what is initially permitted should be a consideration of why a buffer around State Parks is essential.

The New Hampshire State Parks are an American jewel. They are bucket list places for people from all over the world. The responsibility for the stewardship of these treasures should not be taken lightly. As New Hampshire citizens, legislators or advocates we should do everything we can to protect these beautiful places. Please pass HB177.

Jerry Curran
NH Sierra Club
Chapter Chair



Conservation Commission

Nature for the Future

46 School Street

Lisbon, New Hampshire 03585

(603) 838-6376

January 7, 2021

Mr. Craig D. Rennie, CWS, CWB
Inland Wetland Supervisor
Land Resources Management
The State of New Hampshire
Department of Environmental Services
PO Box 95
Concord, NH 03302

RE: Standard Dredge and Fill Wetlands Permit Application (RSA 482-A) NHDES File Number: 2020-02239, Subject Property: Douglas Drive, Dalton, Tax Map #M405, Lot #33

Dear Mr. Rennie:

The Lisbon Conservation Commission has reviewed a copy of your response and request for more information on the above stated application. As a downstream community, we are particularly concerned with #16 of additional information required:

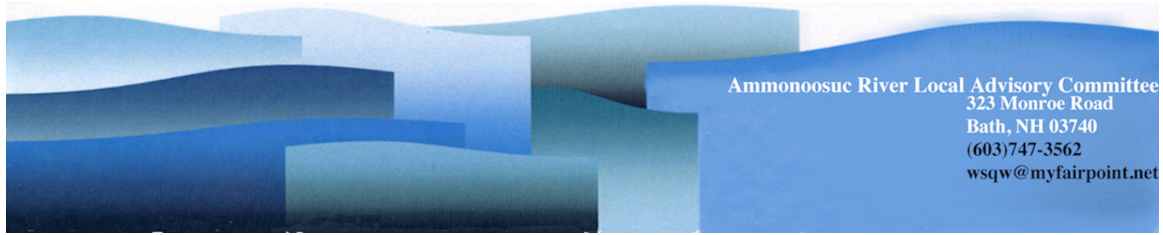
"16. It is not clear how the downstream high-value Alder Brook wetland complex (which was previously considered for prime wetland designation by the Town of Dalton) and ultimately the Ammonoosuc River's water quality will be protected if treatment of landfill runoff fails or if the landfill liners develop leaks over time. Downstream wetlands and surface waters should be monitored long term to protect from contaminants and pollution, and to ensure that these resources are protected pursuant to RSA 482-A:1. It should be noted that there are also downstream communities that depend on the Ammonoosuc River as a drinking water source, so it is imperative that these issues are addressed as part of the project."

The Town of Lisbon's drinking water comes from two wells located adjacent to the Ammonoosuc River. There have been issues with contamination of these wells in the past. The Conservation Commission is concerned how Lisbon's water quality would be further impacted by the proposed project. Please take this into account in your review of the application.

Sincerely,

Katrine N. Barclay
Chair, Lisbon Conservation Commission

Cc: Rene Pelletier, NHDES Assistant Director, Water Division
Scott Champlain, Lisbon Selectboard
Jon Swan, Save Forest Lake
Eliot Wessler, North Country Alliance for Balanced Change
Richard Walling, Ammonoosuc River LAC
Rebecca Metcalf, Casella Resource Solutions
Bruce Grover, Casella Resource Solutions



Ammonoosuc River Local Advisory Committee
323 Monroe Road
Bath, NH 03740
(603)747-3562
wsqw@myfairpoint.net

To: Craig Rennie, CWS, Inland Wetland Supervisor
NHDES Wetlands Bureau
Land Resources Management Water Division,
NH Dept. of Environmental Services
PO Box 95, 29 Hazen Drive
Concord, NH 03302

Date: October 1, 2020

Re: NHDES File #2020-02239

Description: Standard Dredge and Fill Wetlands Application for the proposed landfill in Dalton and Bethlehem

Applicant: Granite State Landfill LLC

Owner: Douglas Ingerson, Jr., d.b.a. J.W. Chipping

Location: Adjacent to and north of NH RT 116 and the Ammonoosuc River in Dalton, NH

Message: The Ammonoosuc River Local Advisory Committee (LAC) members held a conference call meeting on September 25, 2020 and reviewed the essential elements of the proposed project, as described in the wetlands application received.

In their review and discussion of the application LAC members noted their concerns about environmental impact to the site selected for the landfill, being uphill of the Ammonoosuc River, a designated river in the NH Rivers Management and Protection Program. 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. The following concerns were expressed:

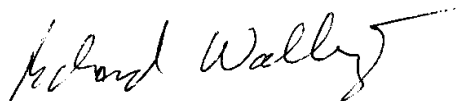
- Disturbance to the well-functioning wetland complex
- Disturbance to Alder Brook fishery managed to protect wild brook trout (catch & release)
- Disturbance to rainbow trout and brown trout fishing in the Ammonoosuc River
- Alder Brook has Highest Ranked Wildlife Habitat in NH in 2020 Wildlife Action 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

- Fluvial Geomorphology indicates very high fluvial erosion zone in this reach of the river (Ammonoosuc River Geomorphic Assessment, Floodplain Conservation, and River Corridor Planning by Dr. John Field, October 2011)
- Slope of land in 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 of tourists, a challenge for the proposed hillside
- Truck traffic blowing dust from gravel driveway down to highway Route 116 below
- Highway sharp turn access to site poses an impediment to traffic flow along highway

A river reflects the health of the watershed. The importance of the river, as a community resource involves local planning and protection efforts by a town. Littleton expressed recognition of the outstanding features of the Ammonoosuc River in 2014, wanting to make the riparian zone and access to it a town focal point. It went ahead to make river district improvements, paired with commitment to take all necessary measures ahead to preserve and protect the existing riparian buffers where and when practical, to offer opportunities for outdoor recreation, bringing greater public knowledge about the river, and spur involvement for the residents to look after their river. Trout Unlimited fishing events, country music, and seasonal events have taken place annually along the shoreline in the town proper. Young people go wading on the ledges in the river. The Farmer's Market is open on the south shore in the summer. No one would feel comfortable enjoying recreational opportunities riverside, if there was a landfill upstream just a stone's throw away. Littleton has committed economic funding for citizen enjoyment of the natural surrounds to be an established use of the riparian zone. Residents and tourists alike seek out the riverside environs for recreation, relaxation and renewal. Imagine how it would feel, if upon leaving the river, one observed landfill trucks, heading up Douglas Drive just a short distance away upstream. The two uses are totally at odds with each other.

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 upstream 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.

Sincerely,



Richard Walling, Chair
Ammonoosuc River LAC



Town of Sugar Hill

1411 Route 117 P.O. BOX 574 SUGAR HILL, NEW HAMPSHIRE 03586
603-823-8468

March 23, 2020

To Whom it May Concern:

The Town of Sugar Hill supports the Town of Whitefield's Warrant Article #40 **"To see if the town will vote to declare its opposition to a landfill development in Dalton"** that was passed by the Whitefield voters on Tuesday, March 10, 2020.

We are particularly concerned about air and water quality impacts to Forest Lake.

We are concerned whether our state regulations are adequate to protect the public interest.

We are dismayed that the state displays no leadership on the question of solid waste disposal and instead leaves that up to private corporations like Casella and Waste Management.

The default policy is to site landfills in the North Country where land values are lower, local towns have less capacity to fight back, fear having their resources drained by expensive lawsuits, and may have inadequate ordinances to oversee large projects like a landfill, with regional impacts.

We believe that Casella's proposed landfill will adversely impact Dalton, Whitefield and surrounding towns. We are concerned that the dramatic increase in heavy, waste hauling tractor trailer trucks will be detrimental to our roads and communities. Foul smelling trucks that often leak fluids are a hazard to road surfaces, village centers and main streets.

We believe that property values will be negatively impacted.

We strongly urge you to oppose landfill development in Dalton.

Sincerely,

Margo Connors
Select Board

Whitefield Conservation Commission
56 Littleton Road
Whitefield, NH 03598

December 16, 2020

Craig Rennie
NH DES Wetlands Bureau
29 Hazen Drive
Concord, NH 03301

Re: NHDES Wetland Application #2020-02239

Dear Mr. Rennie,

We would like to stringently state our opposition to the destruction of *ANY* of our Whitefield wetlands and note that this flies in the face of our Whitefield Master Plan and everything that our town values and posterity.

The proposed Casella Landfill development project will damage Whitefield more than any other community or town in the area.

Our particular concern is the proximity of this project to our **primary** well that provides Whitefield's town water supply. Leachate from this project would drain directly into Forest Lake and from there downstream into our primary water supply. The potential impacts on wetlands, groundwater, shorelines, local streams, nearby bodies of water including Forest Lake and Burns Lake, plants, and wildlife are profound. Increased truck traffic and site leachate also contribute to the negative environmental impact of spillage, litter, and exhausts, not to mention public safety, noise, odor, and infrastructure damage. We cannot overstate our objection to this desecration of our community resources.

With all due respect, we expect that you will keep us informed on the progress of the proposal.

Sincerely,

Frank Lombardi

Chairman
Whitefield Conservation Commission

cc: Whitefield Planning Board
Whitefield Selectboard
Dalton Conservation Commission, Selectboard, and Planning Board
Thomas E. O'Donovan, NHDES
Michael Wimsatt, NHDES
Robert Scott, NHDES
Phil Bryce, NH Parks
Tom Brady, Coos County Commissioner
Linda Lauer, Grafton County Commissioner
Michelle Moren-Grey, North Country Council
Andrew Dorsett, Town Manager Littleton NH
Cecile Stubbings, Admin Assistant Littleton NH
Bethlehem Conservation Commission, and Selectboard
Ammonoosuc River LAC
Edith Tucker, NH District 5
Troy Merner, NH District 3
Erin Hennessey, NH Senator
Joe Kenney, Executive Councilor
NH Governor Sununu
Robert Blechl, Caledonian Record
Angel Larcom, Littleton Courier
Tara Giles, Coos County Democrat
John Koziol, Manchester Union Leader
Rosalind Page, Ammonoosuc Conservation Trust
Jack Savage, Society for the Protection of NH Forests



Office of Selectmen

Town of Whitefield, N.H. 03598

"Heart of the White Mountains"

603/837-2551

March 16, 2020

The Honorable Governor Chris Sununu
N.H. State House
107 North Main Street
Concord, NH 03301

Dear Governor Sununu:

At this year's town meeting, the citizens of Whitefield overwhelmingly voted in favor of a petitioned warrant article which opposes the proposed landfill development in nearby Dalton by Casella Waste Systems. As Whitefield's elected officials we are dutifully forwarding the warrant article for your consideration.

The Selectboard shares many concerns expressed by the voters. We worry about the potential negative impacts of increased truck traffic in our village center, unwanted odors in neighboring homes, ground and surface water pollution, and declining private property values. Clearly the proposed landfill is a development project with potential regional impact. As such, we request the project application be subject to appropriate public hearings such that the full concerns of both private and public interests can be voiced and considered before any approval is granted.

We thank you in advance for your careful consideration of our concerns.

Sincerely,

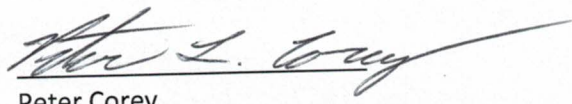
Board of Selectmen



John Tholl



Stanley Holz



Peter Corey



NEW HAMPSHIRE
30 S. Main St., Suite 101
Concord, NH 03301
Phone: (603) 229-1331
Fax: (603) 229-3221

To the NHDES Wetlands Bureau
Re Wetlands Application #2020-02239

Good afternoon,

My name is Hayley Jones, and I am the Vermont and New Hampshire organizer with Community Action Works, a non-profit that works side-by-side with community groups to confront polluters and seed solutions. Today, I'm writing to ask the Wetlands Bureau to deny wetland permit application #2020-02239, on the grounds that landfill construction would endanger both human and environmental health.

The current permit application lacks crucial information about potential impacts on the downstream Alder-Brook Wetland Complex and the Ammonoosuc River. Industrial waste haulers have a history of Clean Water Act violations in New Hampshire waterways, and a leaking landfill is already sited on the Ammonoosuc.¹ In order to protect wetlands and rivers from pollution, the DES Wetlands Bureau must employ the precautionary principle in denying this permit application.

North Country conservation experts, community researchers, and townspeople have also found fault with the application. The newly-created Dalton Conservation Commission has advised the Bureau to deny the permit, given the proposed landfill's "significant and severe impact on valuable wetlands, some of the 'highest ranked' wildlife habitat in the state, and other important aquatic resources."² Furthermore, as of March 8th, the towns of Littleton and Carroll have voted by a 3:1 margin against the proposed Dalton landfill, citing the "immediate impacts to valuable wetlands and forested habitat, as well as potential impacts down the road to the surrounding wetlands and bodies of water."³

Accepting this wetlands permit would enable contamination of valuable ecosystems, doing nothing to deal with New Hampshire's waste problem. Instead of

¹ <https://www.clf.org/blog/ammonoosuc-river-pollution-landfill/>

² https://www.caledonianrecord.com/news/local/new-legal-front-opens-up-in-fight-against-casella/article_e9b93da4-0588-544a-9bfl-9912273fe3c5.html

³ https://www.caledonianrecord.com/news/local/littleton-votes-gendreau-glides-to-reelection-residents-support-community-forest/article_e5aed8a6-5fdc-5ece-994c-7a5e10fb6eee.html?fbclid=IwAR0In6OlyQoDTkrZHJC1r07ZaE5ojn3l1x0JpwHtGqXe1CqqAWfx_gM7lok

building new, private landfills, the state must revise its solid waste management rules, which have not been updated since 2003. By focusing on reducing our trash, bolstering our composting and recycling programs, and rejecting out-of-state waste, we can protect our wetlands and our people.

We at Community Action Works ask you to protect the future of Granite State wetlands by denying this dangerous permit application. Please don't hesitate to reach out with further questions.

Sincerely,

Hayley Jones
Community Action Works
hayley@communityactionworks.org
(971) 400 5197