

https://www.caledonianrecord.com/news/local/nhdot-deems-casella-driveway-permit-application-incomplete/article_46fc2a5c-94e7-5d2c-91bf-f1d8c98b0290.html

NH DOT Deems Casella Driveway Permit Application Incomplete

Department Requests More Information, Some Of It A Second Time

Robert Blechl rblechl@caledonian-record.com Staff Writer

Apr 18, 2023



The New Hampshire Waste Management Council on Monday suspended its order on North Country Environmental Services Stage VI landfill expansion in Bethlehem after Casella Waste Systems filed a motion for rehearing. Here on June 3, two waste haulers (red cabs) wait in Franconia for the Trudeau Road landfill to open. (File photo by Robert Blechl)

The New Hampshire Department of Transportation is requesting more information from Casella Waste Systems regarding truck traffic to and from its proposed Granite State Landfill in Dalton as the department remains unconvinced that trucks would not take the shortest route through Lit

On Friday, Jim McMahon, assistant District 1 engineer for DOT, issued a letter to Casella stating that traffic estimates and data are still needed and “several items in this letter were requested previously and have not been adequately addressed to issue a permit.”

If they are not addressed, DOT will deny the application.

DOT’s 13-point letter requesting more information follows the department’s review of information that Casella provided in June 2022 in response to DOT’s January 2022 comment letter on the proposed landfill, which, if approved, would be sited off of Route 116 and accessed from Douglas Drive, a segment of which is in Bethlehem.

Among the 13 areas needing more information, McMahon said Casella did not provide traffic estimates or trip generations for the existing land uses that include a concrete and asphalt plant and a proposed drag strip that are listed on the application, nor did the company provide any adjustment for seasonal variations for land uses in operation, such as a gravel pit.

DOT requests that Casella provides 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 conditions at the Douglas Drive intersection.

“Driveway permits are issued to the landowner [the land is currently owned by Douglas Ingerson Jr.] and only includes the uses listed on the application,” said McMahon. “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 or expansion would require reapplication with DOT and an updated traffic study, he said.

Casella also did not address how damage (rutting) from haul trucks often parking along the highway shoulder and the Interstate 93 on- and off-ramps would be discouraged while drivers wait for the landfill to open, said McMahon.

Casella indicated it would provide drivers with a restroom and coffee and water at its North Country Environmental Services landfill in Bethlehem (the land-filling operations of which are scheduled to close after 2026), and the proposed new landfill would provide staging along Douglas Drive within one hour before the facility opens, he said.

“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,” said McMahon.

In addition, DOT’s District 1 is uncomfortable with Casella’s “self-imposed and enforced truck route proposal,” he said.

The company has proposed routing northbound trash hauler traffic along Interstate 93 to Route 3 and south to Route 116.

In the traffic study it provided to DOT, Casella proposed routing southbound traffic along interstates 91 and 93 to eastbound Route 302 through Bethlehem to northbound Route 3 and to Route 116.

Both routes would bypass Littleton, but McMahon noted that Littleton would be the shortest route.

“District insists that the traffic study be adjusted to redistribute traffic volumes along the shortest route available,” said McMahon. “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.

From the north on I-93, he noted that the company’s proposal of using Exit 40 in Bethlehem and through Bethlehem and Twin Mountain to the landfill is 29.7 miles, which is about 22 miles longer than the shortest route of 7.5 miles from Exit 42 in Littleton and through Littleton to Bethlehem.

From the south on I-93, McMahon noted that the company’s proposal of using I-93 Exit 35 in Franconia and through Twin Mountain and Whitefield is 25 miles, while the shortest route is 15.4 miles at Exit 41 in Littleton and through Littleton to Bethlehem.

DOT also recommends that Casella provide photographs and dimensions of the common truck sizes currently using the NCES landfill.

The traffic study that Casella submitted to DOT estimates 102 trips a day, which McMahon said would be 25 percent more than in Bethlehem.

In addition, DOT requests that Casella removes the proposed wall and guardrail and provide fill slopes along the proposed acceleration lane on Route 116.

“The land adjacent to this portion of the state highway is NHDOT Rail right-of-way,” said McMahon. “This was requested previously by the department.”

Also requested previously was a proposed adjusted layout for Douglas Drive so haul trucks entering from the north and exiting on the south can use slip lanes within the deceleration and acceleration lanes.

Other Incomplete Applications

The public record shows several incompleteness letters issued by DES throughout the years.

At NCES, the New Hampshire Department of Environmental Services has made multiple requests for new information.

On April 3, Jaime Colby, an engineer with DES’s Solid Waste Permitting and Review Section, said Casella’s application for a Type II permit modification regarding an updated operating plan at NCES to address emergency leachate removal is incomplete, and more information is needed.

DES’s review of the application is suspended until the information is provided.

In January, DES issued a letter of incompleteness regarding a requested approval for the final design and construction of the Stage VI Phase II expansion at NCES.

Casella later responded to DES’s incompleteness letter with supplements to its application.

In June 2021, DES issued a letter of incompleteness regarding the company’s initial standard permit application for Dalton.

In June 2022, the company withdrew its permit application, with the stated intent to file a new application after a few months. In December 2021, it withdrew its wetlands permit application for Dalton.

On Wednesday, Casella spokesman Jeff Weld was asked why DOT had to request the information for Dalton, and some of it a second time, why the company hasn’t provided the information to date, and when it intends to provide it.

After proposing its landfill for Dalton, Casella representatives, in mailers to area residents and in statements to the public, said the company has the experience and expertise to build and operate the facility.

In regard to Casella's experience, Weld was asked why a number of applications to DES and DOT have been deemed incomplete and why the state agencies have had to ask for, at times on multiple occasions, the required information.

He was also asked when the company intends to submit permit applications for the Dalton proposal and when the company expects to have approvals.

"The request from the NHDOT is a normal course of action for the permitting process," Weld said in a statement. "This is consistent with regulatory agencies throughout our operations, and is an important part of the process. It would be more notable if a regulatory agency deemed a permit application complete on its first submission as opposed to the back-and-forth we see as a normal course of business."

The company is preparing its response and will be submitting it within the requested time frame, he said.

"We've often said that the permitting process for this kind of facility is long and includes many opportunities for all stakeholders to provide meaningful input at the federal, state, and local levels, which has been the case," said Weld. "We remain within the initial timeline presented and expect to submit our updated permit applications within the next several months."

Robert Blechl