

Good Morning Town of Franconia Selectboard Members:

I am writing in reference to the "Notice of Price Increase" letter you received from Casella Waste Systems, dated November 4, 2022, attached. I would like to note the importance of the date of that letter, as it was written the day after the NH Waste Management Council (WMC) DENIED Casella's motions for reconsideration and rehearing of the Conservation Law Foundation appeal of the NCES Landfill Stage VI expansion permit on November 3, 2022, news stories attached. Casella's letter to the town is no coincidence, as there is a very strong possibility that the NCES Landfill could close soon, depending on what NHDES Commissioner Robert Scott intends to do, since the WMC remanded the permit back to Commissioner Scott for review. With the now-approved permit for Phase III-A expansion of the AVR RDD Mt. Carberry Landfill, there is no "capacity shortfall" in NH until 2034, thus there is no "substantial public benefit", as per RSA 149-M, for the continued operation of the NCES Landfill. Thus, Casella's "rate increase" letter to Franconia, and I'm certain, all of the NH towns sending waste and recyclables to the NCES Landfill in Bethlehem.

It should also be noted that the letter from Casella does not make any mention of the NCES Landfill in Bethlehem as being the destination for your town's waste and recyclables. The letter is from Amber Vecchiarelli, a "territory sales representative" from Montpelier, VT, not NCES Landfill Manager Kevin Roy. It is my strong belief that Casella Waste Systems is preparing for the potential closure of the NCES Landfill, much sooner than 2026, the end of permitted life for that facility under the now-unlawful Stage VI expansion permit. In fact, it is my belief that the destination for your waste and recyclables will most likely be the Casella-operated Clinton County Landfill in Morrisonville, New York, as that is the closest facility owned and/or operated by Casella, see attached maps. They cannot legally haul your waste to Maine, since the state-owned Juniper Ridge Landfill, which Casella operates, prohibits out-of-state waste, nor the Casella-owned Coventry Landfill in Vermont, since your town does not have a Solid Waste Implementation Plan (SWIP), required by Vermont statute to utilize landfills in Vermont.

I find it to be very deceptive for Casella to lead your town board to believe that the reasons they offer for the **107% rate increase**, from \$229.45 to \$476.45, just for hauling your waste and recyclables 11 miles, not including tipping fees, are somehow justified. The rate increase for hauling certainly makes more sense if your waste and recyclables are instead, being hauled to New York as a result of the potential closure of the NCES Landfill, sooner than 2026, as a result of the WMC decision on the unlawfulness of the Stage VI expansion permit, granted by NHDES in 2020. Of course, actually sharing that information with your board might put things in a much clearer perspective for you and your decision regarding this extreme rate hike, as you obviously have other options for your town's waste disposal needs.

Thus, I feel you owe it to the citizens of Franconia to explore other waste disposal options in order to be fiscally responsible as elected officials. There is no justification for simply rubber-stamping a 107% rate increase, from \$229.45 to \$476.45, per "box", being hauled a mere 11 miles. While the AVR RDD Mt. Carberry Landfill, just outside of the Town of Berlin in the unincorporated Town of Success, is certainly further away than the NCES Landfill, 45 miles from Franconia's transfer station, it is not 140 miles, as the Clinton County Landfill is, maps attached. In fact, Dalton made the switch to AVR RDD/Mt. Carberry in 2020, and SAVED money, despite the longer haul. Furthermore, this is a great opportunity for North Country towns to begin working together, utilizing shared services and resources, to LOWER waste disposal costs, particularly relative to hauling expenses. I believe you have employees in your town highway department with CDL licenses. Why not shares the costs (*I bet there are grants available to assist with such an endeavor*) amongst North Country towns, proportionately, for a shared flatbed roll-off truck, to haul containers to Mt. Carberry, coordinating/scheduling amongst North Country towns, and thereby treating waste disposal as a utility and not a profit center for an out-of-state corporation? They certainly are not dealing in good faith with

you, as evidenced by their deceptive letter of November 4, 2022. Trust me, this is not the first time this company has attempted to mislead town selectboards in NH.

This is not the first time I have reached out to you to warn you of the pending closure of the NCES facility. As you are certainly aware, we are adamantly opposed to the creation of another Casella-owned/operated, commercial landfill in the North Country, particularly next to Forest Lake in Dalton. For the record, at this point in time, Casella has NO permit applications filed with NHDES for their proposed GSL Landfill in Dalton, next to Forest Lake. It is not wanted, and, as the November 3, 2022 decision of the WMC affirmed, it is NOT NEEDED. According to the recently-released NHDES NH Biennial Solid Waste Report, attached, there is no potential landfill "capacity shortfall" until 2034, see pages 6-9. Coupled with the November 3, 2022 decision by the WMC, relative to RSA 149-M and "substantial public benefit", it will be impossible for Casella to obtain the necessary permits for a new landfill in NH, or at least until 2034. Thus, Casella's rate hike letter, issued to the Town of Franconia the next day. They are preparing for their post-NCES reality in NH. it does not have to be yours.

Now is the time to reach out to AVR RD/Mt. Carberry, to set a new course for North Country waste disposal, utilizing shared services and North Country ingenuity. You owe it to the citizens of the Town of Franconia as their fiscal agents.

You can reach AVR RD at (603) 752-3342.

<https://www.avrdd.org/>

cc'ing North Country Council and North Country Towns who probably received a similar letter.

Thank You!

Jon Swan
25 Cashman Rd
Dalton, NH 03598
(603) 991-2078
Founder, [Save Forest Lake](#)

Do not allow this proposed development to scar the beautiful landscape of the North Country for generations to come

Please let me know if you would like to join our effort to protect and preserve our wonderful New Hampshire environment and natural resources from further exploitation, degradation, and contamination by corporate profiteers!

***"Unless someone like you cares a whole awful lot, nothing is going to get better. It's not."
-The Lorax***