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State: Casella Wetlands Permit Application Missing Vital Information

DES Says Landfill Near State Park Could Have Visual And Recreational Impacts

Robert Blechl
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information and the company did not consider other sites where impacts to wetlands would be less. (File photo by Robert Blechl)

The new battlefield on the proposed Casella Waste Systems landfill in Dalton is the company's dredge and wetlands permit application that opponents urge the state to reject and that the state now says is missing big pieces of information.

On Wednesday, the New Hampshire Department of Environmental Services issued a five-page, 27-point letter to Casella stating that the missing information and company responses to local conservation commissions and advisory committees must be provided by Jan. 17 or the application that was filed in September will be denied.

DES officials also state there might be better areas for a new landfill that would have less impact on wetlands than the site proposed in Dalton, where some 17 acres would be destroyed.



Local opposition groups say DES's findings indicate an application that is woefully deficient and poses much environmental harm. They ask DES to reject it.

Casella representatives said they would provide the information for what will be a long process.

Application Findings

The Vermont-based company needs a wetland permit to move forward with what they call the Granite State Landfill, a private, commercial landfill of 180 acres with a 40-year life that it seeks to build on a site next to Forest Lake State Park.

In his letter to Casella, Craig Rennie, inland wetland supervisor with DES's Land Resources Management, asked the company to address how future expansions of the three-phase landfill will impact surrounding wetlands and surface waters on the property, "as this long-term planning is critical to determine if avoidance and minimization of wetland resources have been fully demonstrated" under DES rules.

Regarding a Sept. 27 letter by DES's Water Division requesting that alternative sites in neighboring states be considered because they might have less overall wetlands impact, Rennie said Casella's analysis considered Maine and Vermont, both of which prohibit out-of-state waste, but did not consider Massachusetts as a potential sitting area.

If excavation and blasting will take place in Dalton, he said it is not clear in Casella's application how those activities would impact surrounding wetlands, groundwater levels, or nearby drinking supplies, including a public water supply near Forest Lake and numerous private wells.

The company needs to provide a further analysis with supporting documentation, he said.

As the company stated and offered in its application, Rennie requested that Casella update meetings with public officials, conservation commissions, and local advisory committees for DES review.

On Oct. 1, DES received a letter of concern from the Ammonoosuc River Local Advisory Commission, whose members in September unanimously voted to oppose the landfill in Dalton and Casella's wetlands application for concerns about a double impact of two landfills upstream of Littleton (Casella has an existing landfill in Bethlehem), future impacts on tourism, recreation and local economic development, drinking water contamination, and traffic safety issues on Route 116

Rennie asked Casella to address each of the LAC comments and comments from the Bethlehem Conservation Commission.

He also said the application states that 17.4 acres of wetlands would be impacted, but the application fee was based on 17.57 acres. Also, the company's engineering report states 16.8 acres of total wetlands impact.

"Please explain the discrepancies," wrote Rennie.



The company is also being asked to supply records of the permits of many roads on the property, some recently constructed, that DES can't find records of.

If there are un-permitted wetland impacts on the property, a full wetlands delineation for disturbed areas must be completed. The areas should be in the plans and updated to reflect additional impacts, said Rennie.



It also appears the project could be located up-slope to the north to reduce the overall wetlands impact, he said.

Although Casella representatives previously told the public that the landfill would not be visible, Rennie said it appears the finished grades of the landfill will be higher in elevation than the land's height toward Forest Lake and the state park, and visual and aesthetic impacts must be further assessed.

For the 397-acre state park and surrounding areas that the state says play a supporting role in regional recreation, DES is asking Casella to provide in greater detail whether impacts from the project could "eliminate, depreciate or obstruct the commerce, recreation or aesthetic enjoyment of the public" as outlined under state law.

It is also not clear how "the downstream high-value Alder Brook wetland complex 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," said Rennie.



Also, he pointed out multiple errors and issues in the application that Casella needs to address and asked the company to show how the project would not impact high-quality wildlife habitats identified in the New Hampshire Wildlife Action Plan.

Lastly, Rennie said stream impacts had not been included in the Aquatic Resource Mitigation (ARM) Fund payment calculation.

He said the permanent loss of stream resources and intermittent streams needs to be included in the total mitigation payment.

With those losses, Casella would have to pay \$2.95 million for 738,399 square feet of wetlands loss, \$19,730 for 216 feet of perennial stream loss, and \$286,637 for 1,046 of intermittent stream loss, for a total ARM payment of \$3.3 million.

Reactions

On Thursday, Casella spokesman Joe Fusco declined to address several specific questions regarding several points in Rennie's letter, among them how the company will ensure that nearby drinking water supplies will not be impacted and if there will be a guarantee with evidence that the project will not adversely impact recreation at Forest Lake State Park.

"We appreciate the DES's letter and the questions they've asked," Fusco said in a statement. "Our permit team will be meeting after Thanksgiving to discuss the necessary responses and to detail how we will present the information they've requested. It's important to remember this is a very long process, and there will be many opportunities for exchanges of information on these and other topics."

One of several local groups opposed to the landfill is the North Country Alliance for Balanced Change, which, in a statement on Thursday, said the environmental harm of the proposed landfill "far exceeds failed Northern Pass project."

NCABC President Eliot Wessler said his group urges DES to reject the wetlands permit "as regional opposition mounts to mega-landfill" and as DES cites deficiencies and threats to the "fragile Ammonoosuc River watershed."



Citing a consultant, Wessler said an expert review conducted for NCABC by Center Sandwich-based Environmental Consultants of New England concludes that the Dalton dump “would have the largest amount of aquatic resource impacts of any project in the state for at least the past 10 years” and would have seven times the proposed impacts associated with Northern Pass.

Casella’s application fails to evaluate alternatives for the “mega-dump” and only considers four other potential sites – all in White Mountain towns, he said.

“They did not consider any alternative sites anywhere else in New Hampshire or any other New England state,” said Wessler. “I’ve offered to help them find large suitable sites for their next dump to be filled with all of New England’s trash in or around Rutland, Vermont, where Casella is headquartered. And the offer is still good.”

For decades Casella has exploited a void in New Hampshire’s regulatory and legislative willpower to adequately reduce, recycle, and dispose of the state’s solid waste by proposing and building massive landfills, he said.

“It seems pretty clear to me why Casella picked Dalton - a town with a small tax base, no zoning ordinance, a more than willing landowner, and virtually right next to all of the existing infrastructure of its Bethlehem dump,” he said.

