



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