

STATE OF NEW HAMPSHIRE
DEPARTMENT OF ENVIRONMENTAL SERVICES
WASTE MANAGEMENT COUNCIL

Docket #25-08 WMC

Appeal of North Country Alliance for Balanced Change

PARTIALLY ASSENTED-TO MOTION TO INTERVENE
OF GRANITE STATE LANDFILL, LLC

Granite State Landfill, LLC (“GSL”) respectfully moves the waste management council to allow it to intervene and participate fully as a party in the above-captioned appeal pursuant to Ec-Wst 203.08 and RSA 541-A:32.

Under RSA 541-A:32, GSL must show that its rights and interests may be affected by the outcome of the proceeding and that the interests of justice would not be impaired. RSA § 541-A:32, I. This appeal arises out of the State of New Hampshire Department of Environmental Services’s (“NHDES”) denial of a standard permit application submitted by GSL on October 31, 2023 and assigned Application No. 2023-66600. The North Country Alliance for Balance Change (“NCABC”) filed a notice of appeal on May 5, 2025. GSL is the real party in interest as it was the party seeking the permit and it has also filed an appeal of NHDES’s denial of its permit application (*see* Docket No. 25-07 WMC). GSL’s rights will be directly affected by the outcome of this appeal. Under RSA 541-A:32, GSL is entitled to intervene and participate fully as a party in this appeal as its rights and interests will be affected if the NCABC is successful. Allowing GSL to participate fully as a party furthers the interests of justice and will assist the waste management council in determining the issues in this appeal.

NCABC assents to the relief requested herein. NHDES takes no position on this motion.

Respectfully submitted,

GRANITE STATE LANDFILL, LLC,

By Its Attorneys,
CLEVELAND, WATERS and BASS, P.A.,

Dated: May 9, 2025

By: /s/Jacob M. Rhodes
Bryan K. Gould, Esq. (NH Bar No. 8165)
gouldb@cwbp.com
Jacob M. Rhodes, Esq. (NH Bar No. 274590)
rhodesj@cwbp.com
Two Capital Plaza, 5th Floor
Concord, NH 03302
Tel. (603) 224-7761
Fax (603) 224-6457

and

LEHMANN MAJOR LIST, PLLC
Richard J. Lehmann, Esq. (NH Bar No. 9339)
rick@nhlawyer.com
6 Garvins Falls Road
Concord, NH 03301
Tel. (603) 634-9435

CERTIFICATION

I, Jacob M. Rhodes, hereby certify that on May 9, 2025, I filed the foregoing document with the appeals clerk by way of email and regular mail and served a copy by way of email upon all persons listed on the service list for this appeal.

/s/ Jacob M. Rhodes
Jacob M. Rhodes, Esq.