

To: Calvin Diessner
Shoreland Supervisor, NHDES
calvin.diessner@des.nh.gov
NH Dept. of Environmental Services
PO Box 95, 29 Hazen Drive
Concord, NH 03302

Date: April 18, 2024

RE: Shoreland Permit Application (RSA 483-B)

NHDES File Number: 2024-00766

Subject Property: Nh Route 116, Bethlehem, Tax Map #ROW, Lot #ROW

Dear Mr. Diessner:

The Ammonoosuc River Local Advisory Committee (ARLAC) discussed the above referenced Shoreland permit application at our April 12, 2024 meeting.

The New Hampshire General court passed the Rivers Management and Protection Act (RSA 483) in 1988. The 44.8-mile segment of Ammonoosuc River, from the White Mountain National Forest boundary near Lower Falls in Carroll, to the confluence with the Connecticut River in Haverhill was enrolled in the NH Rivers Management and Protection Program in 2007. The upper reach of the river to its source at the Lake of the Clouds was designated in 2009.

The ARLAC has specific concerns relevant to the above referenced application:

- Land use change can affect water quality and our responsibility as river stewards is to protect this valuable resource.
- Ammonoosuc River is a source of drinking water downstream in Woodville and in Lisbon within the river's proximity to the Lisbon town wells.
- As reported in the Ammonoosuc River Geomorphic Assessment, Floodplain Conservation, and River Corridor Planning by Dr. John Field, October 2011, Fluvial Geomorphology indicates a very high fluvial erosion zone in this reach of the river.
- Topography directs drainage flow from the site down to the river.
- Increased stormwater runoff from the proposed increase in impervious surface.
- There will be a negative aesthetic consequence.
- Environmental impacts from the increase in truck traffic, erosion from the project would disturb wildlife habitats.
- Public safety will be endangered as trucks cross the east and west bound traffic when turning left. It will increase the risk of accidents that would pollute the river.
- Exhaust fumes and noise from the accelerating and decelerating trucks turning into a landfill will result in air and noise pollution.

- The potential for a disastrous leachate spill from a truck accident that would almost certainly impact the Ammonoosuc River cannot be ignored. The town of Bethlehem emergency services who would be the first responders do not have the equipment to deal with such a disaster. The poisons would flow downstream to Littleton and other communities along the river. This is not conjecture as it has happened. A leachate truck crashed into another truck on December 31, 2019 from a Casella landfill in Coventry Vt.
<https://www.vermontpublic.org/vpr-news/2019-12-31/state-plans-to-resume-leachate-cleanup-thursday-from-truck-spill-in-coventry>
- The potential for accidents involving vehicle/animal interactions as this is a crossing area as animals, including moose try to access the river.
- The risk to public safety and the environment will increase in the winter when the snow plow pushes the snow from the travel lane into the proposed acceleration lane.
- There is a high likelihood of increased litter within the protected area.
- Runoff of gas, oil, and leaking trash juice from the trucks due to 100+ more trucks.
- Though not stated in the included Driveway Permit Application the intended use of the driveway is to access the Granite State Landfill.
- The sole reason for the proposed project is to provide access to the proposed Granite State Landfill (see RSA 149-M:9).

There are several omissions in the application:

1. On the application as received by the ARLAC Section 11- Required Certifications the boxes are not initiated.
2. The applicant states that shoreland worksheets cannot be completed because the percentages cannot be accurately calculated. As a result, we are unable to determine if the proposed actions meet the requirements of the Rivers Management and Protection Act (Section 483-B:9, Env-Wq1400.)
3. There is no stormwater management plan included in the application.

Based on the above noted concerns and omissions it is the opinion of the ARLAC that Shoreland Permit NHDES File Number: 2024-00766 should not be issued.

Thank you for your consideration,

Courtney Bowler
Chair, Ammonoosuc River Local Advisory Committee