



The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

September 27, 2019

Mr. John Gay, E.I.  
Casella Waste Systems, Inc.  
1855 VT Route 100  
Hyde Park, VT 05655

Dear Mr. Gay,

As was discussed at the August 7, 2019 pre-application meeting with the NHDES Wetlands Bureau, the Department would expect the following information as part of your wetlands permit application.

- Regarding the alternative sites presented, quantify the approximate potential wetland and stream impacts for each alternative site that can be used to adequately compare against the selected site. This should not only consider wetland impacts from direct dredge and fill, but potential downstream impacts to wetlands and surface waters from changes in hydrology.
- Evaluate the proposed project site's potential downstream impacts to wetlands and surface waters from changes in hydrology; evaluate the hydrologic connection between adjacent wetlands and stream systems.
- Evaluate and compare the functions and values of wetlands at each site that can be used to evaluate the site selection process and the overall project related impacts (See ENV-WT 302.04(a) below).
- The proposal must consider and quantify all temporary impacts related to clearing, equipment staging areas, stockpile areas, construction access, etc.
- The proposal should address solid waste containment from impacting adjacent wetland areas and surface waters, and should address wildlife related issues like identifying exclusion fencing locations.
- The proposal will need to provide plans on solid waste and residuals (e.g., leachate) management as they relate to potential impacts on the wetlands complex.
- The proposal must demonstrate from plan and example that the following factors have been considered in the project's design in assessing the impact to areas and environments under the departments jurisdiction (ENV-WT 302.04 (a)):

<https://www.des.nh.gov/organization/divisions/water/wetlands/documents/wet-permit-app-instruct.pdf> and

<https://www.des.nh.gov/organization/divisions/water/wetlands/documents/wet-permit-app-attach-a.doc>.

[www.des.nh.gov](http://www.des.nh.gov)

29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095  
(603) 271-3503 • Fax: 271-2867 TDD Access: Relay NH 1-800-735-2964

- The proposal should detail on-site quarry or gravel operations and their potential effects on adjacent wetlands, surface waters and groundwater.
- As presented in the pre-application meetings, approximately 30% of the waste stream comes from out-of-state sources. For this reason, NHDES requests that you provide information on alternative sites in neighboring states. Specifically, provide information regarding potential out-of-state locations that were considered as part of this proposal that may involve less overall impact to wetlands, groundwater and surface waters.
- NHDES also asks, as part of the avoid, minimize, mitigate requirement, that you comprehensively demonstrate reducing the project's footprint to avoid wetlands and surface waters.

Additionally, we discussed the potential for a site visit by one of our Wetlands Bureau staff. To coordinate this visit, please contact Craig Rennie, NHDES Wetlands Bureau at [craig.rennie@des.nh.gov](mailto:craig.rennie@des.nh.gov) or at (603) 271-0676. For any further project pre-application activity, please contact either Jim Martin, NHDES Public Information Officer, at (603) 271-3710, or Timothy Drew, Administrator of the Public Information and Permitt Unit, at (603) 271-3306.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas E. O'Donovan', with a long horizontal line extending to the right.

Thomas E. O'Donovan, P.E. PMP  
Director, Water Division