

**Monday, January 5, 2026 6:30 PM**

**Regular Session**

**Dalton Select Board Meeting**

Meeting called to order at 6:30pm by Jo Beth. Select Board members Jo Beth Dudley and Thomas Dubreuil were present. Town Admin, Jeanette Charon present and note taking. Meeting available for public viewing via Zoom.

Public attendees: Paul Deveno, Mandy Deveno and Warren Green. Via Zoom: Carol Sheltry, Cathy's iPad, and Jon Swan.

The Board signed AP and payroll checks. Tom asked about the check for Eurofins Environmental. Jeanette informed him that's the company that does environmental testing on Dalton's closed landfill. Jo Beth asked about getting Adam's name on the gas card. Jeanette has tried with no luck. We do know Adam has the card and is the one using it. Jo Beth asked about the Gooden's bill. Jeanette informed her it was for a breakdown on a town truck. Jo Beth asked if Avitar's invoice was for the entire year. Jeanette confirmed it was.

The Public Hearing for unanticipated revenue funds was called to order at 6:39pm. FEMA paid \$12,357.15 as part of the reimbursement for town road repairs and mitigation. This reimbursement is for Dalton Roads II – a combination of 12 roads in Dalton. Eric asked for details on how much has been reimbursed for each road; Jeanette provided the Board with the breakdown per project, by date, amount, etc. The outstanding amount was also provided as well as what the total reimbursable amount will be once we are paid for all the work completed through 2025. The report included mitigation work, as completed in 2025. Tom asked about the email sent out for \$94,437. Jeanette informed him that was not FEMA money. It was for the NH Rooms and Meals Tax payment from the state. Tom asked for explanation on that. Jeanette provided an explanation. Jo Beth asked the public if they had any questions regarding the revenue. Paul Deveno asked for details on the balance. Jo Beth provided those details. **A copy of the report is attached to these minutes.** Paul asked if the majority of the reimbursement has been received. That was confirmed. Jo Beth asked if the date we use is the date it was actually received or the date the Board accepted the unanticipated funds, as this impacts the amount designated as received in 2025 and considered at Town Meeting. Jeanette has not heard back from Jamie at DRA yet. Tom asked if the outstanding is what FEMA will take care of. Jeanette confirmed it's been requested for reimbursement but the town had not received the money. Jo Beth motioned to accept the \$12,357.15. Tom provided a second with approval via roll call vote. The Board went back into its regular meeting at 6:44pm.

Jeanette provided the board with a yield tax warrant. Jo Beth motioned to approve the yield tax warrant. Tom provided a second with approval via roll call vote.

Jeanette provided the fire department mutual aid contract for the Select Board's review and approval. Jo Beth motioned for approval. Tom provided a second with approval via roll call vote.

Jeanette provided Jo Beth with the information requested regarding the DIT note on the November credit card reconciliation. The item was a deposit in transfer (DIT), and it was for the operating account and not the credit card. The bookkeeper made the necessary correction to both November reconciliation reports.

Jeanette provided the meeting minutes from December 22, 2025. The minutes were just sent that morning and will be pushed to the next meeting as Tom hadn't received the attachment in his email. Jo Beth forwarded the minutes to Tom in the meeting so he could review them prior to the next meeting.

Nonpublic meetings 1, 2, 3, and 4 were provided to the Board for review and approval. Jo Beth individually motioned each set of minutes for approval. Tom provided a second for each set of minutes individually. Roll call votes for all sets of minutes were approved via roll call vote.

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There is no update on the VOIP phone system. Jeanette will reach out to Fidium to find out about scheduling. We are stuck keeping Spectrum until the phones are installed with Fidium.

Jeanette does not have an update from Carpet Connections on the moisture issue in the municipal building floors.

Our recycling issue still remains. Jeanette spoke with Lancaster about them taking our recycling and she's awaiting their decision. They were meeting to discuss the topic. They would need to revise their NH DES Permit in order to do so.

We are ready to schedule a working session for 2026 budget prep. The final payroll and last review of the allocations still needs to be done. Jeanette provided the Board members with a draft report. She stated it can still change at this point. A working session was scheduled for Monday, January 12, 2026, at 5:00pm. Jeanette will send the board members a reminder – as well as to inform Eric in his absence. She will also post notice for the meeting.

There were no updates from the Building Committee or the Planning Board. The HCA committee meets next week (1/12/26).

There was an email from the conservation commission chair asking about increased town costs due to the use of Casella/NCES for disposal of waste. An assessment is needed to determine this. Jo Beth asked Tom if he will do it. Tom asked how he would go about it. Jo Beth explained that she when she did it last year, she came into the office and got the information from the AP files and made a spreadsheet. The total expense is listed on the report Jeanette provided. Tom asked if Jeanette could send him the files. Or if it would be too much. Jeanette stated he could come in and look at the files any time she is here. He agreed. The outstanding Casella reimbursement request was briefly discussed. Tom asked for copies of the cancelled checks. Jeanette confirmed she would get them for him. Tom again mentioned \$30k or so that the Board provided for Jon before Tom was on the Board. He stated that maybe it was in 2022? No one recalled this. Tom asked about the old Board minutes. Jeanette asked Tom to provide those details on this issue, so she could look into it. Tom asked how to get to the old Board minutes. Jeanette stated he could go into the website. The Conservation Commission is asking the Board to make the reimbursement request of Casella. Tom stated he wasn't for it because Jon did things he wasn't supposed to do. He was spending town money without Board approval and that's not ok. Tom can't recall the other things; he would have to get the paper. Jo Beth reminded Tom that the request is from the Conservation Commission, not an individual and that the Select Board doesn't control the conservation commission or their account. Their account is controlled by the Treasurer. Regarding Eric's email request for information on the request for reimbursement, there was no entry to the property site. Access was denied by Casella's attorney. Tom disagreed. Jo Beth reminded Tom that the DCC acts on behalf of the town. Under Canvass was asked to reimburse the town and did. Jo Beth motioned for the Board to ask Casella for the reimbursement of the DCC expenses. Tom provided a second-but just for discussion. Reports for the work done are on the DCC webpage. Tom won't agree because he doesn't agree with what Jon did. Jo Beth reiterated that actions aren't done by one person, they're done by the commission and follow state statutes. Paul Deveno asked if Casella paid the reimbursement, would the funds be unanticipated and would they go into operating funds? The funds would go back into the conservation commission since that's where it was paid from. Jo Beth voted yay on her motion; Tom voted nay. Mandy asked that the Dalton Conservation Commission emails be included in the minutes for record. Jo Beth confirmed.



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Jo Beth asked if Tom was attending the next Conservation Commission meeting. Tom confirmed.

The solar panels are installed and working. They are snow covered so they are not producing electricity at this time. Jeanette reached out to Barrington Solar regarding generation. Jo Beth confirmed she received that email. She asked Tom if he wanted to get the emails regarding energy production. He stated that would be good. Jeanette will administer the request. Jo Beth asked if we received the 90% reimbursement from DES for the grant. Jeanette confirmed we received \$73,650.60. She needs to confirm with Jamie at DRA regarding those funds and a meeting for unanticipated revenue. She doesn't believe it'll be necessary since we had the funds included in our anticipated revenues for the year.

Jeanette has not completed the grant for the transfer station scale.

Jeanette has not received the information from Adam or Ron regarding the grant funding opportunity for truck grants for the highway department and fire department.

Jo Beth asked if FEMA approved the time extensions including the latest mitigation plan. Jeanette has not submitted that plan yet. FEMA likes to provide extensions in increments. We have received approvals on the projects into July for all of the open projects. There should be no issue with getting the extensions pushed to November as long as we are making progress.

The town's public hearing for the budget will be on Thursday, February 12, 2026, at 6:00pm. If necessary, the second hearing would be held on Thursday, February 19, 2026 at 6:00pm.

The town report development is starting. Jeanette has asked all of the groups to provide their report on or before January, 15, 2026. She has received a few so far. The Board needs to choose who the report will be dedicated to. The Board will start discussing that at the working session on January 12, 2026. She will start drafting items.

Charity Baker from Lancaster will be here to cover Town Clerk duties for vacation coverage. Jeanette will appoint Charity as Assistant Clerk so she can complete clerk duties including receiving the declaration of candidacy forms and the petition warrant articles for Jeanette upon her return. Jeanette will provide a copy of the documents to the Board. Jo Beth motioned to appoint Charity Baker as the Assistant Town Clerk. Tom provided a second with approval via roll call vote. Jeanette asked that her compensation be the same as Jeanette's. Jo Beth motioned for the pay rate to be the same as Jeanette's. Tom provided a second with approval via roll call vote. Jeanette will process her Oath of Office and send them to the NH Secretary of State as well as the DMV. Tom asked if she still works for Lancaster. Jeanette stated she did. He asked how she will be here if she is there. Jeanette stated that she had assistants to cover her absence.

\$.725 is the new IRS standard mileage rate. Jeanette has been using \$.625 through 2025. Jo Beth asked about Kyle using his truck and being paid mileage, and if he had provided proof of insurance. Jeanette forgot to ask Kyle for his insurance; she will do that.

Jeanette provided the Veroff CPA audit engagement letter for the Board's approval. We need to get on his schedule before we get pushed out too far for the audit. Jeanette emailed this letter to the board members as requested by Jo Beth during the last meeting. Jo Beth motioned for approval. Tom didn't see the letter. He took time during the meeting to review the letter which is the same as used in previous years. After his review, Tom provided a second with approval via roll call vote.

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North Star Canine Connection has asked for a key to access the building for her training session in the gym on Saturdays. Jo Beth requested we give her a key-fob. Tom asked if residents wanted to use the facility. Jeanette stated that if a resident had it reserved, she would have to reschedule her class. She has reserved the space and paid her deposit. Jeanette will issue her a fob.

There were no public comments.

Jeanette has two nonpublic items; one is legal and the other is personnel. Jo Beth motioned to enter nonpublic session at 7:40pm. Tom provided a second with approval via roll call vote.

Jo Beth motioned to re-enter public session at 8:09pm. Tom provided a second with approval via roll call vote.

Jo Beth motioned to seal the minutes of both nonpublic sessions. Tom provided a second with approval via roll call vote.

Jo Beth motioned to adjourn at 8:10pm. Tom provided a second with approval via roll call vote.

Jo Beth did have another item that was forgotten; it was discussed off record. She provided some background information to Tom regarding HB314 and she asked him to comment individually if he could.

Minutes Respectfully submitted by Jeanette Charon.

Minutes Approved On: 1/19/26 (date)

Jo Beth Dudley

Jo Beth Dudley

Thomas Dubreuil

Eric Moore

Eric Moore



## FEMA Funds

Date Received	Amount	Outstanding	Project
2/14/2025	\$ 43,308.75		Smith Road
9/5/2025	\$ 69,909.02		Dalton Roads III and Culverts
			Dalton Roads III and Culverts \$44,675.25
9/22/2025	\$ 233,255.30		Blakslee Road and Culverts \$188,580.05
			Dalton Roads II and Culverts \$242,701.28 Smith
10/7/2025	\$ 529,627.95		Road \$286,926.67
11/21/2025	\$ 2,778.82		Blakslee Road and Culverts
11/26/2025	\$ 151,145.70		Dalton Roads II and Culverts
12/12/2025	\$ 12,357.15		Dalton Roads II and Culverts
	<b>\$ 1,042,382.69</b>		
		\$ 27,314.76	Smith Road
		\$ 17,993.82	Dalton Roads III and Culverts
		\$ 99,969.52	Blakslee Road and Culverts
		<b>\$ 145,278.10</b>	

### Projects:

Roads II: Winter, Wallace, Big Hill, McGinty, Miller, Ridge, Simonds, French, O'Neill, Bradley, Mountain, Faraway

Roads III: Union, Harriman and Briggs

Smith Rd

Blakslee Rd

Total Reimbursable to date: \$ **1,187,660.79**

## Town Admin

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**From:** Conservation Chair  
**Sent:** Sunday, January 4, 2026 6:58 AM  
**To:** Selectmen; Town Admin  
**Cc:** Conservation Commission; Town Clerk; Planning Board; Schlosser, Michael; McKenna, Edward; Governor Ayotte; David Rochefort; governorayotte@nh.gov; Trowbridge, Philip; Bethlehem Conservation Commission NEW email; Scott, Robert; Wimsatt, Mike; Crepeau, Adam; sarah.l.stewart@dncr.nh.gov; william.j.cass@dot.nh.gov; tom.brady@cooscountynh.us; raymond.gorman@cooscountynh.us; yeni19681@hotmail.com; mmcleod@grafftoncountynh.gov; wpiper@grafftoncountynh.gov; jlibby@grafftoncountynh.gov; selectman1@bethlehemnh.org; selectman2@bethlehemnh.org; selectman3@bethlehemnh.org; selectman4@bethlehemnh.org; selectman5@bethlehemnh.org; Csofikitis@gmail.com; tlindquist@bownh.gov; Frank Lombardi; kmcdaniel@bownh.gov; abrennan@bownh.gov; administrativeassistant@whitefieldnh.org; Tom Alt; selectmen@townoflittleton.org; ecolby@bownh.gov; vpotter@townoflittleton.org; selectmen@townofcarroll.org; megellana3@aim.com; James.Tierney@leg.state.nh.us; Jared.Sullivan@leg.state.nh.us; Seth.King@leg.state.nh.us; Joseph Kenney; Henderson Chuck (Shaheen); Belanger Ben (Hassan); jsavage@forestsociety.org; mmoren@nccouncil.org; Nhacc Barbara Richter; lflanagan@bownh.gov; Brochi.jean@Epa.gov; solidwasteinfo@des.nh.gov; mary.f.daun@des.nh.gov; james.w.orourke@des.nh.gov; Jaime.M.Colby@des.nh.gov; ridge.mauck@des.nh.gov; Andrea at NH LAKES; Ginny Jeffries; nbosworth@clf.org; Amy Manzelli; board@northcountryabc.net; Debra.Altschiller@leg.state.nh.us; Donovan.Fenton@leg.state.nh.us; Rebecca.PerkinsKwoka@leg.state.nh.us; Suzanne.Prentiss@leg.state.nh.us; Cindy.Rosenwald@leg.state.nh.us; Sharon.Carson@leg.state.nh.us; William.Gannon@leg.state.nh.us; James.Gray@leg.state.nh.us; Daniel.Innis@leg.state.nh.us; Timothy.Lang@leg.state.nh.us; Keith.Murphy@leg.state.nh.us; Denise.Ricciardi@leg.state.nh.us; Ruth.Ward@leg.state.nh.us; matt.wilhelm@leg.state.nh.us; sherman.packard@leg.state.nh.us; Jason@Osborne4NH.com; Alexis.Simpson@leg.state.nh.us; Steven.Smith@leg.state.nh.us; swwg@maillist2.nh.gov; Janet.L.Stevens@nh.gov; David.K.Wheeler@nh.gov; htrimarco@clf.org; cf.bowler90@gmail.com; Diers, Ted; michael.marchand@wildlife.nh.gov; Berger, Emma; tracie.j.sales@des.nh.gov; Pelletier, Rene; riversprogram@des.nh.gov; sabrina.stanwood@dncr.nh.gov; alan.g.hanscom@dot.nh.gov; selectmen@sugarhillnh.org; townadmin@franconianh.org; Cc: DES: Water Quality Certification; Judith; gary.d.milbury@des.nh.gov; todd.moore@des.nh.gov; Nicole Manteau; abrousseau@townoflittleton.org; townclerk@whitefieldnh.org; mary.a.tilton@des.nh.gov; DARLENE.C.FORST@des.nh.gov; Padmaja.Baru@des.nh.gov; Bill.Bolton@leg.state.nh.us; Tony.Caplan@leg.state.nh.us; Gaby.Grossman@leg.state.nh.us; Kat.McGhee@leg.state.nh.us; David.Meuse@leg.state.nh.us; Nancy.Murphy@leg.state.nh.us; Rosemarie.Rung@leg.state.nh.us; peterbarrettschmidt@gmail.com; Laura.Telerski@leg.state.nh.us; Wendy.Thomas@leg.state.nh.us; Suzanne.Vail@leg.state.nh.us; Jonah.Wheeler@leg.state.nh.us; jfedolfi@comcast.net; sheila.s.rydel@des.nh.gov; District4@dot.nh.gov; Judy.Aron@leg.state.nh.us; Barbara.Comtois@leg.state.nh.us; Kelley.Potenza@leg.state.nh.us; Peter.Bixby@leg.state.nh.us; Megan.Murray@leg.state.nh.us; Nicholas.Germana@leg.state.nh.us; Linda.Haskins@leg.state.nh.us; Molly.Howard@leg.state.nh.us; Allison.Knab@leg.state.nh.us; paige.beauchemin@leg.state.nh.us; Arnold.Davis@leg.state.nh.us; Demers, Daniel;



**Cc:** erica.layon@leg.state.nh.us; Joseph.Barton@leg.state.nh.us;  
Calvin.Beaulier@leg.state.nh.us; Darrell.Louis@leg.state.nh.us;  
mark.mcconkey@leg.state.nh.us; Tim.McGough@leg.state.nh.us;  
Tara.Reardon@leg.state.nh.us; pat.long@leg.state.nh.us; Daryl.Abbas@leg.state.nh.us;  
McClammer@aol.com; pat.long@leg.state.nh.us; Tim.McGough@leg.state.nh.us;  
victoria.sullivan@leg.state.nh.us; Sallie.Fellows@leg.state.nh.us;  
Mary.HakkenPhillips@leg.state.nh.us; elephantsmarching@msn.com;  
adminrules@leg.state.nh.us; liz.barbour@leg.state.nh.us; james.gruber@leg.state.nh.us;  
laurence.miner@leg.state.nh.us; karen.liothill@nh.gov; John.A.Stephen@nh.gov; ~House  
Environment and Agriculture Committee; David.Watters@leg.state.nh.us;  
Kevin.Avard@leg.state.nh.us; Howard.Pearl@leg.state.nh.us;  
Cindy.Rosenwald@leg.state.nh.us; jami.wyman@leg.state.nh.us;  
kristi.ausfresser@leg.state.nh.us; Lisa.Freeman@gc.nh.gov; Kevin.Scully@gc.nh.gov;  
Molly.Howard@gc.nh.gov; seandurkin4NH@gmail.com; lori.korzen@gc.nh.gov;  
info@candiaconservationcommission.org; Outreach; Delgiudice Frank J CIV USARMY  
CENAE (USA); 'Lefebvre, Lindsey E CIV USARMY CENAE (USA)'; Turley Tammy R CIV  
USARMY CENAE (USA); Byars, Julie A CIV USARMY (USA); landuse@townofcarroll.org;  
john.m.formella@doj.nh.gov; barry@normandeauinc.com  
**Subject:** Re: In The News: Consolidation contributes to trash-collection costs  
**Attachments:** 1 2 2026 Casella Waste Systems\_ Industry consolidation impact - Concord Monitor.pdf

*Good Morning Chair Dudley:*

*I wanted to share this recent news report from the Concord Monitor, relative to Casella and its business practices in the southern part of New Hampshire. As we have seen in Dalton, the decision by our two pro-Casella, pro-GSL Selectmen to try and pave the way for the proposed landfill project by re-establishing service with Casella has resulted in cost increases and operational inefficiencies in the Town of Dalton. This was clearly evident during the discussions leading up to the illogical decision to utilize the services of Casella/NCES over other, 3rd party haulers. Making the switch from the AVRRDD Mt. Carberry Landfill to the NCES Landfill has resulted in cost increases and operational inefficiencies at our own transfer station, to the detriment of the Town of Dalton. With the pending closure of the NCES Landfill, I would request that the Selectboard, once again, re-open discussions with other, 3rd party haulers like Normandeau, to resume utilizing the AVRRDD Mt. Carberry Landfill in Success, NH for our town's waste disposal needs.*

### **Consolidation contributes to trash-collection costs**

by David Brooks

January 2, 2026

The acquisition by regional giant **Casella Waste Systems** of two area trash-hauling systems is part of a national trend of greater consolidation in the industry, which has raised **concerns about increasing prices as competition declines.**

The Rutland, Vt.-based firm, which has annual revenues of around \$1.8 billion, has bought Pinard Waste Hauling of Hooksett and Purmore Waste of Allenstown in recent years. It now provides trash pickup and hauling to “more than 124,000 households and 11,000 businesses in over 200 towns statewide,” including municipal contracts for Concord, Manchester, and a half-dozen other municipalities, said Jeff Weld, vice president of communications.

"Pinard and Purmore are both good examples of companies that provide opportunities for smooth transitions for employees and customers alike. Acquisitions like this strengthen local service reliability and sustainability by gaining operational efficiencies, placing fewer trucks on the roads, and creating safer work environments through better technology," Weld wrote in response to a Monitor query.

The most obvious technology change is trucks picking up roadside trash with robotic arms, a system in place in Bow, Laconia and Manchester, among other places, that will be tested in parts of Concord next summer.

Any efficiency gains **aren't translating into lower costs for communities**, however.

Bow, for example, saw a **40 percent increase in trash and recycling costs** after Casella bought Pinard Waste, the town's longtime hauler.

***"The change to Casella is costing us quite a lot, and I wish there were other options for us to consider,"*** Angela Brennan, vice chair of the Bow Select Board, said at a public meeting last year. ***"But it seems like they have a hold on the market and that's a little concerning."***

Concord's most recent contract with Casella increased disposal costs from approximately **\$70/ton to about \$100/ton** and **added on costs for recycling for the first time**.

Casella, which was founded in 1975 when Doug Casella began picking up trash in a pickup truck, completed six acquisitions in the first half of 2025, representing over \$90 million in annualized revenue, and planned several others along the Eastern Seaboard, according to published reports.

They're not alone. Through the first three quarters of this year, the U.S. solid waste industry's five largest publicly traded companies spent about \$2.7 billion on acquisitions, according to a summary by industry publication Waste Dive. Many are known as "tuck-ins," where small independent firms are completely absorbed into the main company rather than maintaining their own brands.

Trash collection has traditionally been a dispersed industry with an estimated 20,000 firms picking up and hauling trash in the U.S., but most of those are very small, serving just a few communities with a few trucks.

Other factors raising the cost of waste collection include fuel, equipment and labor costs. New England, like much of the country, is also seeing a squeeze on landfill space that has led to a surcharge of \$3.50 per ton for businesses and out-of-state haulers starting next year.

<https://www.concordmonitor.com/2026/01/02/casella-waste-acquisition-impact-nh/>

Thank you!

Jon Swan, Chairman  
Town of Dalton Conservation Commission  
756 Dalton Road  
Dalton, NH 03598  
(603) 991-2078 (cell)  
[Dalton Conservation Commission Website](#)



## Town Admin

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**From:** Conservation Chair  
**Sent:** Monday, December 29, 2025 10:35 AM  
**To:** Town Admin  
**Cc:** Selectmen; Conservation Commission; Planning Board  
**Subject:** Fw: Casella Reimbursement Request  
**Attachments:** NEES Bat Assessment GSL Project 16166.50 total.pdf; 12 30 2024 EFI GSL Assessment 15000.pdf; DCC Final Invoice CVES 2 5 2025.pdf; 11 2 2025 Moore DCC email.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Morning Jeanette:

Please include this DCC email chain below to the BOS, and its topic, Casella Reimbursement Request, in the next BOS meeting minutes documentation, as it should be discussed as part of the DCC liaison's report to the BOS, as per his role as liaison. I believe the next BOS meeting is scheduled for January 5, 2026.

Thank you!

Jon Swan, Chairman  
Town of Dalton Conservation Commission  
756 Dalton Road  
Dalton, NH 03598  
(603) 991-2078 (cell)  
[Dalton Conservation Commission Website](#)



**Coming up:**

Next Meeting: January 20, 2026, 6PM

\*Public Meetings: Anyone, not just local residents, may attend, take notes, record and photograph the meeting. However, except as required in a public hearing, the public has no guaranteed right to speak. RSA 91-A:2  
[https://www.nhmunicipal.org/sites/default/files/uploads/documents/public\\_meetings\\_governmental\\_records.pdf](https://www.nhmunicipal.org/sites/default/files/uploads/documents/public_meetings_governmental_records.pdf)

*\*In order to save time during public meetings, and to ensure accuracy in response, the Dalton Conservation Commission requests that all comments and questions from the public be submitted to the DCC email address.*

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**From:** Conservation Chair <conservationchair@townofdaltonnh.gov>  
**Sent:** Sunday, December 28, 2025 8:55 AM  
**To:** Selectmen <selectmen@townofdaltonnh.gov>  
**Cc:** Town Admin <townadmin@townofdaltonnh.gov>; Conservation Commission <conservationcommission@townofdaltonnh.gov>; Planning Board <planningboard@townofdaltonnh.gov>  
**Subject:** Fw: Casella Reimbursement Request

Good Morning Chair Dudley:

As a follow-up to the August 16, 2025 email to the board (and the October 24, 2025 reimbursement request email to Casella), I am writing to inform you that we have not heard from Casella, relative to our request for reimbursement for the expenditure of DCC funds to retain experts to provide an environmental assessment of the proposed GSL project in Dalton.

As shared previously, the experts retained, and the costs associated with their services, in evaluating the potential impacts of the GSL project, paid in full, are as follows:

NEES \$16,166.50

EFI \$15,000.00

CVES \$15,000.00

**Total: \$46,166.50 to be reimbursed to the Dalton Conservation Commission by Casella Waste Systems/Granite State Landfill (GSL)**

**Considering that it appears the GSL project is now dead, it would be prudent for the Selectboard to assist the DCC in our effort to be reimbursed for our expenses.**

I did receive a random email from Selectman Moore on November 2, 2025, attached. Since it appeared to not come from the actual BOS as an official communication, it was not replied to. His intent was not clear, as it sounded like he was acting on behalf of Casella, not the town. It appeared his main concern was whether or not any of the experts retained may have entered the project site, which they did not. That would be trespassing, as our request for a site visit was denied by Casella's attorney. Copies of the reports, which are large files, are available on the DCC section of the town website, and included in the DCC RFMI submitted to NHDES, also on the DCC town page. They detail a significant amount of information, relative to potential environmental impacts to the environment and natural resources of the town. I suspect neither Selectman Moore, nor Selectman Dubreuil, have bothered to read any of the reports, as evidenced by their lack of knowledge on the matter.

Selectman Dubreuil has done the town a significant disservice in his failure to attend the monthly DCC meetings in his role as the BOS liaison. All of the questions asked during the regular BOS meetings on issues DCC related, including the retainment of experts, DCC fund expenditures, and subsequent discussions, could have been easily answered by the board's liaison. Selectman Dubreuil would have been able to share information, in intelligible fashion, with the Selectboard, had he chosen to attend our regular, posted, monthly meetings. He has obviously chosen to not attend, sadly. That reflects poorly on the Selectboard, and should be addressed by you in your role as Chair, going forward.



In light of the non-response from Casella, I would again, request that the BOS submit a request to Casella for reimbursement of funds to the DCC.

I would appreciate a response, once the Selectboard has the opportunity to discuss and render a decision.

Thank you!

Jon Swan, Chairman  
Town of Dalton Conservation Commission  
756 Dalton Road  
Dalton, NH 03598  
(603) 991-2078 (cell)  
Dalton Conservation Commission Website

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**From:** Conservation Chair  
**Sent:** Saturday, August 16, 2025 5:49 AM  
**To:** Selectmen <selectmen@townofdaltonnh.gov>; Town Admin <townadmin@townofdaltonnh.gov>  
**Cc:** Conservation Commission <conservationcommission@townofdaltonnh.gov>; Planning Board <planningboard@townofdaltonnh.gov>  
**Subject:** Casella Reimbursement Request

Good Morning Chair Dudley and Selectboard Members:

I am writing to request that the three (3) attached invoices be submitted to Casella Waste Systems with a request from the Selectboard for reimbursement to the Dalton Conservation Commission. As the stewards of the natural resources for the Town of Dalton, it was prudent that we conduct a full evaluation of any and all potential environmental impacts associated with the Casella GSL landfill project at Douglas Drive in Bethlehem and Dalton. This is a cost which should be borne by the developer, not one placed upon a town with limited resources.

The experts retained and the costs associated with their services, in evaluating the potential impacts of the GSL project:

NEES \$16,166.50

EFI \$15,000.00

CVES \$15,000.00

**Total: \$46,166.50 to be reimbursed to the Dalton Conservation Commission by Casella Waste Systems/Granite State Landfill (GSL)**

Thank you!

Jon Swan, Chairman  
Town of Dalton Conservation Commission  
756 Dalton Road  
Dalton, NH 03598  
(603) 991-2078 (cell)

Dalton Conservation Commission Website



**Coming up:**

Next Meeting: August 19, 2025, 6PM

**\*NO DCC MEETING IN JULY\***

\*Public Meetings: Anyone, not just local residents, may attend, take notes, record and photograph the meeting. However, except as required in a public hearing, the public has no guaranteed right to speak. RSA 91-A:2  
[https://www.nhmunicipal.org/sites/default/files/uploads/documents/public\\_meetings\\_governmental\\_records.pdf](https://www.nhmunicipal.org/sites/default/files/uploads/documents/public_meetings_governmental_records.pdf)

*\*In order to save time during public meetings, and to ensure accuracy in response, the Dalton Conservation Commission requests that all comments and questions from the public be submitted to the DCC email address*



14-Feb-23

*Town of Dalton, New Hampshire*

*Granite State Landfill, LLC*

### Project Risk Assessment for Bats

Phase I Initial Project Screening	Desktop survey of existing habitat and species occupancy data, including regulatory status updates. Phase I includes on-site habitat assessment by NEES	\$ 3,702 Pending
Phase II Field Survey	Acoustic monitoring for bat activity adjacent to the Project Site that meets the requirements of the U.S. Fish & Wildlife Service Summer Survey Guidelines	\$ 10,711 Pending
Project-Specific Document Review	Review existing documents pertaining to the Project application, including additional natural resource applications that may be submitted on behalf of Granite State Landfill, LLC.	\$ 2,602 Pending
Meeting-Related Expenses	NEES representation at two town meetings or other Project-related hearings in Dalton	\$ 4,153 Pending
<b>Total Estimated Cost:</b>		<b>\$ 21,167.00</b>



**North  
East  
Ecological  
Services**

North East Ecological Services

P.O. Box 3596

Concord, NH 03302

(603) 545-7012

#### Assumptions and Conditions

1	<i>NEES is requesting payment in advance of services.</i>
2	<i>NEES will notify the Town of Dalton at major cost milestones (\$5,000, \$10,000, and \$15,000) and provide tracked costs and expenses upon request by an authorized agent of the Town.</i>
3	<i>Estimate is inclusive of all labor and expenses. If it is determined that additional time or expenses is needed, NEES will provide an additional cost estimate and will only proceed with work after receipt of written authorization to proceed.</i>
4	<i>All billing will be based on time and expenses, and any remaining balance will be returned to the Town of Dalton upon completion of work.</i>



**North  
East  
Ecological  
Services**

North East Ecological Services  
P.O. Box 3596  
Concord, NH 03302  
Phone: 603 545-7012

E-mail: sreynolds@neesbats.org  
Web Site www.neesbats.org

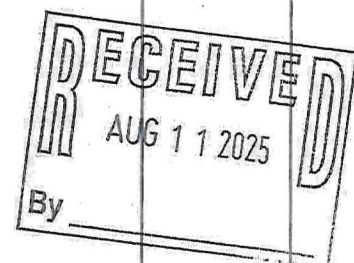
# Invoice

Date	Invoice #
12/30/2023	877

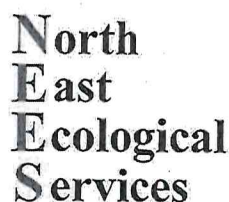
Bill To
Town of Dalton Selectboard Dalton, New Hampshire attn: Jon Swan

Granite State Landfill	
Project ID	PO/Subcontract ID

Item	Date	Quantity	Description	Rate	Amount
Administrative Fees	3/8/2023	1	contract setup and management	100.00	100.00
Literature Review	4/23/2023	1	Review of Literature pertinent to the Project (NHDOT, Caledonian-Record)	125.00	125.00
Literature Review	6/23/2023	1	Review of Literature pertinent to the Project (Site Plan, Gould Letter)	125.00	125.00
Literature Review	8/15/2023	1	Review of Literature pertinent to the Project (Casella Air Permit)	125.00	125.00
Literature Review	9/28/2023	2.5	Review of Literature pertinent to the Project (Keith Supplemental Wetlands, Dalton NRI)	125.00	312.50
Literature Review	11/3/2023	1	Review of Literature pertinent to the Project (Abutter's Letter, Permit Pending Letter)	125.00	125.00
Literature Review	12/11/2023	4	Review of Literature pertinent to the Project (GSL Permit) and NLEB Assessment	125.00	500.00
Report Preparation	12/22/2023	4.5	Preparation of draft report	125.00	562.50



			<b>Total</b>	\$1,975.00
Terms	Pre-Paid Contract	<b>Customer Total Balance</b>		-\$5,000.50



E-mail: [sreynolds@neesbats.org](mailto:sreynolds@neesbats.org)  
Web Site [www.neesbats.org](http://www.neesbats.org)

Date	Invoice #
2/28/2024	889

Bill To		Town of Dalton Selectboard Dalton, New Hampshire attn: Jon Swan		Granite State Landfill	
				Project ID	PO/Subcontract ID
Item	Date	Quantity	Description	Rate	Amount
Literature Review	2/10/2024	2.5	Review of Literature pertinent to the GSL Project	125.00	312.50
Report Preparation	2/12/2024	6.5	Preparation of 2024 GSL Report	125.00	812.50
Report Preparation	2/16/2024	5.5	Preparation of 2024 GSL Report	125.00	687.50
			<div style="border: 1px solid black; padding: 5px; text-align: center;"> <b>RECEIVED</b>              AUG 11 2025              By _____           </div>		
				<b>Total</b>	\$1,812.50
Terms	Pre-Paid Contract		<b>Customer Total Balance</b>		-\$5,000.50





**North  
East  
Ecological  
Services**

North East Ecological Services

P.O. Box 3596

Concord, NH 03302

Phone: 603 545-7012

E-mail: sreynolds@neesbats.org

Web Site www.neesbats.org

**Invoice**

Date	Invoice #
7/30/2024	891

**Bill To**

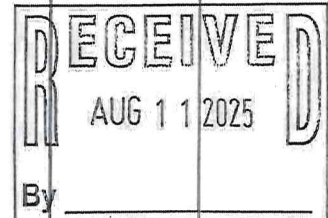
Town of Dalton Selectboard  
Dalton, New Hampshire  
attn: Jon Swan

**Granite State Landfill**

Project ID

PO/Subcontract ID

Item	Date	Quantity	Description	Rate	Amount
Material Review	4/16/2024	3.5	Review of material and documents for comment and analysis	125.00	437.50
Report Preparation	4/29/2024	3.5	Preparation of U.S. Army Corps Letter	125.00	437.50
Material Review	6/29/2024	2.5	Review of material and documents for comment and analysis	125.00	312.50
Material Review	7/30/2024	4.5	Review of material and documents for comment and analysis	125.00	562.50
Equipment Calibration	7/30/2024	5.5	equipment calibration and preparation	125.00	687.50
Preparation	7/30/2024	5.5	site evaluation and deployment preparation	125.00	687.50



**Total**

**\$3,125.00**

Terms

Pre-Paid Contract

**Customer Total Balance**

**-\$5,000.50**



**North  
East  
Ecological  
Services**

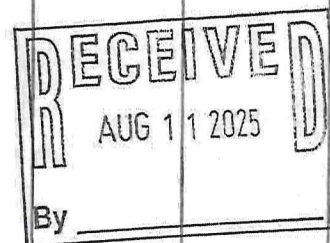
North East Ecological Services  
P.O. Box 3596  
Concord, NH 03302  
Phone: 603 545-7012

E-mail: sreynolds@neesbats.org  
Web Site www.neesbats.org

# Invoice

Date	Invoice #
8/30/2024	892

Bill To			<b>Granite State Landfill</b> <table border="1"><tr><th>Project ID</th><th>PO/Subcontract ID</th></tr><tr><td> </td><td> </td></tr></table>			Project ID	PO/Subcontract ID		
Project ID	PO/Subcontract ID								
Town of Dalton Selectboard Dalton, New Hampshire attn: Jon Swan									
Item	Date	Quantity	Description	Rate	Amount				
Field Services	8/1/2024	1	Field Day - equipment deployment	0.00	0.00				
Field Services	8/2/2024	1	Field Day - equipment deployment	1,250.00	1,250.00				
Field Services	8/3/2024	1	Field Day - equipment recovery	1,250.00	1,250.00				
Data Download	8/5/2024	4.5	Download and data verification	125.00	562.50				
Data Analysis	8/5/2024	6	Filtering and Analysis of Acoustic Data	125.00	750.00				
Mileage Reimbursement	8/4/2024	740	mileage reimbursement (Warner < -- > Dalton)	0.675	499.50				
Meals	8/1/2024	1	per diem meal expense	64.00	64.00				
Meals	8/2/2024	1	per diem meal expense	64.00	64.00				
Meals	8/3/2024	1	per diem meal expense	64.00	64.00				
Equipment Rental	8/4/2024	10	Anabat unit rental (3 days)	100.00	1,000.00				
Data Analysis	11/22/2024	4.5	Filtering and Analysis of Acoustic Data	125.00	562.50				
Report Preparation	11/27/2024	4.5	Preparation of project report	125.00	562.50				
Report Preparation	11/29/2024	4.5	Preparation of project report	125.00	562.50				
Report Preparation	12/1/2024	3	Preparation of project report	125.00	375.00				
Report Preparation	2/10/2025	3.5	Preparation of Final Project Report	125.00	437.50				
<b>Total</b>				<b>\$9,254.00</b>					
Terms		Pre-Paid Contract		<b>Customer Total Balance - \$5,000.50</b>					





6 Identify features as indicated. Details on back.

North East Ecological Services  
PO Box 3596  
Concord, NH 03302-3596

Citizens Bank  
64-163/114

001894

7/25/2025

PAY TO THE ORDER OF Town of Dalton Selectboard

\$ \*\*5,000.50

Five Thousand and 50/100\*\*\*\*\* DOLLARS

Town of Dalton Selectboard  
Dalton, New Hampshire  
attn: Jon Swan

MEMO

*Don Rgh* MP

⑈001894⑈ ⑆011401533⑆ 3310736921⑈



earthforensics, inc.

## SCOPE OF WORK AUTHORIZATION

MSA # \_\_\_\_\_ SOW # 1

### CLIENT:

Mr. Jon Swan  
Conservation Chair, Dalton Conservation Commission  
756 Dalton Road, Dalton, NH 03598  
Telephone: (603) 991-2078  
Email: [conservationChair@townofdalton.com](mailto:conservationChair@townofdalton.com)

**PROJECT LOCATION:** Dalton, New Hampshire

**INTRODUCTION:** Earth Forensics Inc, a California corporation, will perform Environmental Consulting and application/permit review services for the Town of Dalton, NH.

**OBJECTIVES:** For this scope of work, Earth Forensics will provide a project impact report for the Town of Dalton that summarizes the potential landfill likely impact of the Project on the environment (including water resources) in Dalton and the surrounding area. For more details, see the proposal dated February 16, 2023.

**PAYMENT TERMS:** The services shall be undertaken on a time-and-materials basis not to exceed \$15,000 (fifteen thousand dollars) in accordance with the terms outlined in our 2023 Professional Fee Schedule attached hereto. Earth Forensics will not exceed, nor will Earth Forensics be required to exceed, the above sum without the written consent of the CLIENT. CLIENT will pay Earth Forensics for the services in accordance with Earth Forensics Professional Fee Schedule in effect at the time the Services are rendered plus other direct costs at an actual cost plus an administration charge of 20%. **Retainer required: \$15,000.** Any remaining balance after completion of the attached proposal or the termination of the Project will be returned to the Town of Dalton.

### CONTACT:

Earth Forensics, Inc.  
Attn: W. Richard Laton PhD  
12532 Vista Panorama, North Tustin, CA 92705  
Telephone: (714) 296-4055; Facsimile: (714) 771-2620  
Email: [wlaton@earthforensics.com](mailto:wlaton@earthforensics.com)

### CLIENT ACCEPTANCE:

BY

TITLE

Chairman, Dalton CC

DATE

Feb 21, 2023



## Earth Forensics Inc.

12532 Vista Panorama  
Santa Ana, CA 92705

# Invoice

<b>Date</b>	<b>Invoice #</b>
12/30/2024	24159

### Bill To

Dalton Conservation Commission  
Attn: Jon Swan  
756 Dalton Rd.  
Dalton, NH 03598

### Project

Dalton Landfill Permit/Application Review

All work is complete!

Item / Consultant	Date	Description	Qty	Rate	Amount
Senior Consultant 2	11/7/2024	Report	6	200.00	1,200.00
Discount		Discount - Professional Courtesy		-295.00	-295.00

<b>Invoice Total</b>	<b>\$905.00</b>
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<b>Payments/Credits</b>	<b>-\$905.00</b>
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<b>Balance Due</b>	<b>\$0.00</b>
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Terms: Due on Receipt  
Please remit to address above.

EIN# 38-3808062



# Connecticut Valley Environmental Services, Inc.

391 River Road  
Charlestown, NH 03603  
603-826-5214  
[McClammer@aol.com](mailto:McClammer@aol.com)

## STATEMENT FOR PROFESSIONAL SERVICES RENDERED

To: Dalton Conservation Commission  
c/o Mr. Jon Swan  
Dalton, New Hampshire

Re: Review and Comment on  
NHDES & ACOE Permit Applications  
Granite State Landfill LLC (GSL)  
Dalton, Tax Map #M405/406 Lot #33/1, 2.1, 2.3, 2.4,  
2.5, 3 and Bethlehem Tax Map #406, Lot# 1, 2

via email: [conservationchair@townofdalon.com](mailto:conservationchair@townofdalon.com)

February 5, 2025

DATE	SERVICES RENDERED
------	-------------------

Feb 1, 2023- Feb 4, 2025	2/4 - Proposal to the Town of Dalton Selectboard and Conservation Commission (DCC) to provide Environmental Consulting Services to review Granite State Landfill LLC (GLS) submissions in support of the GSL.
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Tasks include attendance at meetings with USACE, NHDES and others; phone conversations and consultations with Jon Swan, DCC chair; review of correspondence and filings related to the project; participation in drafting DCC comments; and, drafting reports including the following:

2/21/2024 - Comments on New Hampshire Department of Environmental Services (NHDES) Waste Management Division Standard Permit for Solid Waste Landfill Application, NHDES Wetland Standard Dredge and Fill Application #2023-03259, NHDES Alteration of Terrain (AoT) Permit Application and National Pollution Discharge Elimination System (NPDES) Stormwater Pollution Prevention Plan (SWPPP)

3/19/2024 - Comments on NHDES Wetland Application #2023-03259 and Associated Applications

5/6/2024 - Request Time Extension for Public Comments on USACE Wetland Application, NAE-2021-02240

5/8/2024 - Comment on USACE Wetland Application, NAE-2021-02240

7/31/2024 - Review and Comment on Shoreland Impact Permit #2024-00766

11/14/2024 - Review and Comment on Water Quality Monitoring Results, North Country Environmental Services, Inc. Landfill in Bethlehem, New Hampshire; implications for Granite State Landfill in Dalton and Bethlehem, New Hampshire

A chronology of tasks with notes is appended.

Retainer	2/24/2023	\$15,000.00
Cost of Services	2/1/2023-2/4/2025	\$15,000.00
		BALANCE DUE \$ 0

Thank you for your business!

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Connecticut Valley Environmental Services, Inc. \* 391 River Road\* Charlestown, NH 03603 \* 603-826-5214

## Chronology of Tasks

2/2-8 – draft proposal for consulting services representing both the DCC and the Town to review applications for a solid waste landfill in Dalton; 3/12 – attend New Hampshire Department of Environmental Services, Waste Management Division (NHDES) public input session on proposed changes to the New Hampshire Code of Administrative Rules for Solid Waste Management; 3/24 – Residents defeat warrant article, by a vote of 96 to 63, seeking abolition of the Conservation Commission, suggesting the people of Dalton want the stewardship of their natural resources to continue; suggest DCC endorse 1) improving landfill siting requirements which would revise setback requirements for wetlands and surface waters, and 2) revising stormwater management design standards based on the current 25-year storm to standards based on a 100-year storm event; 6/14-22 - Discussions with Atty Gould to schedule a June site inspection; 6/15 - comment on proposed rules that they will have ramifications well beyond wetland applications; 6/27 – remotely attend DCC meeting on @ 6:30 PM; indicate I cannot adequately address the potential of vernal pools, identify plant species (RTE?) nor confirm wetland delineations based on aerial photographs; to verify wetland delineations I may need to verify the presence of hydric soils; 8/18 – review interagency pre-application meeting with project representatives, the NH Department of Environmental Services (NHDES) Land Resources Management Program, the US Army Corps of Engineers (USACE) and the US Environmental Protection Agency (EPA) on April 19, 2023; 10/31 - NHDES receives solid waste permit application; Wetlands Bureau has not received a Wetlands application for GSL; 11/15 – phone conversation with JS; 11/30 – ask elected officials in NH to urge NHDES to suspend processing of the permit applications until new rules are adopted; 12/16 - a site visit is necessary; but, a site visit in winter, particularly with snow on the ground, will not be sufficient to make accurate assessments of potential impacts. I favor deferring the site visit and report until June 2024. I also recommend that the applicant stake the locations of all wetlands and impact areas in the field before the site visit. And, that all potential phases of the landfill and all other foreseeable projects within the vicinity of the proposed project be identified during the site visit for the purpose of evaluating cumulative impacts; 12/11/2023 - Alteration of Terrain (AOT) permit application is now available for review online; the wetlands dredge and fill permit application has not been submitted; 1/1/2024 - review Solid Waste Landfill and Alteration of Terrain Permit Applications, the purpose of the AoT application is to demonstrate the project will not have an adverse effect on the quantity and quality of surface water that leaves the project site after it is developed; it does not specifically address habitat loss or wetland functions such as desynchronization of flood flows and improvement of water quality, these latter natural wetland functions are ostensibly mitigated by engineered structures such as stormwater detention and infiltration basins and treatment practices such as rain gardens. Of interest, the analysis of the feasibility of infiltration is not yet complete as addition onsite tests are proposed to be completed in 2024. Moreover, the impact of development of the drag strip and business park and the potential expansion of the existing rock quarry and gravel pit are not included in the stormwater models. I did note that material from the quarry and pit will be used to construct the landfill so expansion of these operations is likely. Based on the stormwater modelling, the post-development runoff rate from a 50-year precipitation event will be less than the pre-development rate. And the volume of water infiltrated into the ground will be increased when the landfill is closed. These analyses do not consider precipitation events of more intense storms (i.e., those associated with 100-year events and greater). These more intense storms have become more frequent and are projected to become even more common due to climate change. The models also do not evaluate the effect of frozen ground (which inhibits infiltration) nor increase in runoff due to rapid snow melt caused by unseasonably warm temperatures during a precipitation event such as the one we experienced on December 18, 2023. All of which contribute to downstream flooding; With respect to specific questions about the numbers in E, F, and G: E, 6,400,000 square feet (146.9 acres), is the total area of cover disturbance for the landfill and appurtenant structures. The project description on page 17,



Part 1, of the AoT Application gives it as approximately 148 acres. F, Additional impervious cover as a result of the project: 578,100 square feet (13.27 acres). Total final impervious cover: 1,152,200 square feet (26.45 acres). Impervious cover is the area within the watershed that will not allow infiltration of precipitation, it will increase runoff, therefore, infiltration and detention basins are proposed to reduce and slow runoff from the site. G, Total undisturbed cover: +/-20,000,000 square feet (459.14 acres). This is an estimate of the total area of undisturbed cover (soils and vegetation) within the watershed of the project.

The total of disturbed and undisturbed cover based on these number is 606.04 acres (459.14 + 146.9). Whereas, the Application states "[the] drainage analysis assumes a watershed area of 585 acres, which includes the 148-acre development area plus upland areas that drain to the site" (page 27, Part 1). This statement is a bit ambiguous to me! Increase in gravel and paved surfaces to widen the 8500-foot driveway should be treated as additional impervious surfaces; these statements are preliminary as I have not drilled down to the details of the stormwater models.

Ideally, a site visit to verify wetland delineations and assessments should be performed during the growing season, likely no sooner than early May. Also, since there have apparently been no onsite surveys for listed species (RTE) a site visit during the growing season to determine if suitable habitats exist for, at least, the marsh horsetail (state endangered) would be helpful. This species has previously been identified just north of the project site.

Wetland Application is deemed incomplete by NHDES; Dave Price states that Feb 19th is the deadline for the submission of missing info. One of the reasons Dave Price has flagged the wetland application as incomplete is because it lacks "dated and labeled color photographs of all proposed jurisdictional wetland impact areas." It is my opinion, our review cannot be completed until after we receive them. My guess is Barry Keith does not have photos of all of the impact areas, and it is generally not acceptable to take pictures of wetlands covered with snow. So, I think they will need to defer submission of these photos after well into the Spring.

I would argue that the review period for the Con Com should not commence until after we have a complete application. This should take us well into Spring, maybe even early summer. Clearly, a better time for a site visit! I think requesting that the Con Com's review period start when we have a complete application is a very reasonable request. Now that the application has been posted online it would be good to cross reference the photos with the application narrative. Soil sampling is important to assess the seasonal water table, determine hydric soils, and confirm wetland delineations and evaluations. The absence of snow makes the identification of herbaceous plant species a bit easier but without its insulating effect it is probable soils will be frozen and we may be unable to auger them. Clearly, a site visit in May or June is preferable.

1/15 – Request the applicant stake the locations of all wetlands and impact areas in the field before the site visit, including all potential phases of the landfill and all other foreseeable projects within the vicinity of the proposed project, including Douglas Drive. Soil will be evaluated with a hand auger. No soil will be removed from the property. Photographs will be taken;

1/23 - DES extends the time for the Dalton Conservation Commission to intervene in the wetland application until March 3, 2024. Need to know when the Ammonoosuc River Local Advisory Committee has received notice that the Shoreland Application has been submitted. Casella needs the Shoreland Ap to be approved if the project is to proceed. The project was discussed at the Connecticut River Joint omissions (CRJC) meeting yesterday, and CRJC may decide to support the Ammonoosuc LAC. Clearly placing a new regional solid waste landfill in the watershed of the Connecticut River may not be in the best interest of the river.



My thoughts (comments) on the AoT are that the existing stormwater methodologies do not account for impacts from storms of frequencies greater than the 50-year, and, measures to ensure no increase in the temperature of runoff are not sufficient. We have experienced many 100-year storms, and some as great as 500-year, within the last ten years. And surface waters from the landfill site will discharge to cold-water fisheries. I expect proposed measures to detain and infiltrate stormwater in conjunction with increased global temperatures will result in a dramatic increase in the temperature of receiving waters.

Submitting permit applications on different timelines smacks of an attempt to piece-meal the permit process. The assessment of impacts identified in each of various applications should be done at the same time to better enable an evaluation of cumulative impacts.

Finally, it is unclear who has the final authority to interpret whether or not a solid waste project is a "public benefit". The December-2023 NH Supreme Court decision places the interpretation of "public benefit" (in RSA 149-M:1) in the hands of the NHDES. This issue, as you may know, has long been settled by the Chevron Deference Doctrine. But this doctrine is currently being adjudicated before the US Supreme Court. The Question is: Should the courts or the environmental agencies determine whether a project is a public benefit?

2/14-21 - Review and draft comments on applications by GSL, Manzelli Letter and Calex Hydrology Report; Submit comments to Dalton Selectboard and Conservation Commissioners members on the documents that have been submitted to date. The Landfill Design is Incomplete!

The project requires the widening (and impacting the protected shoreland of the Ammonoosuc River) of Route 116 in Bethlehem for access to the landfill. These impacts are part of the landfill project. Without these shoreland impacts the project is dead. Casella absolutely needs this road work. In the federal lexicon - "but for" these impacts the project cannot proceed.

A bill before NH E&A this year would include landfills as Developments of Regional Impact. Currently it is difficult, if not impossible, to get a DRI designation in towns without a zoning ordinance.

3/1 - There are 235 test pits which consistently indicate estimated seasonal high water (ESHW) is within three feet of the soil surface. These data were not submitted with the Solid Waste Permit application but were included in the AoT submission as "application-part-2-appendix-1." The solid waste application does not include this information nor tries to reconcile the discrepancy between these data and their well logs which conveniently places the water table (not ESHW) at seven feet which enables the project to comply with a required six-foot separation between ESHW and the landfill liner.

3/3 - For clarification, portions (access improvements) of the proposed Dalton Casella landfill (aka Granite State Landfill or GSL) are within the protected shoreland of the Ammonoosuc River. Thus, the Ammonoosuc LAC has the responsibility to comment. The River Bend Local River Subcommittee of the Connecticut River Joint Commissions will not receive a Shoreland Permit Application to comment on. However, stormwater discharges from the GSL will drain to the Ammonoosuc, which is tributary to the Connecticut River. And since the watershed of the Ammonoosuc is a sub-watershed of the Connecticut River and CRJC's responsibility extends to projects within its watershed, I think it is appropriate for CRJC's full commission to address this project.

3/6 - Director Wimsatt discusses the issue of defining and determining the estimated seasonal high water (ESHW) and its separation distance to the landfill liner

at: <https://www.youtube.com/live/V15VzDTbf8M?si=dPEN8dN3PJO3-RQP&t=2107> House E&A Subcommittee discussion re: DES-landfill siting rules, etc.

3/12 – No detections of nine PFAS analytes at GSL site based on testing conducted between 2019 and 2023. Recommend that no DES permit be issued until 1) we get clarification as to whether the GSL project complies with the DES siting standard (Env-SW 804.02 (d)) pertaining to the separation of the liner from the seasonal high water, and 2) water quality protective measures are enhanced through the adoption of new rules that will require sizing storm water control structures that are sufficient to control more extreme precipitation events.

Dalton submits **The Report of the Dalton Conservation Commission** on the Wetland Application to DES.

Review March 12 meeting notes of the discussion between DES and Casella cited in the February 28-Incompleteness letter;

3/19/24 – Draft Comment letter on ESHW to JS; 3/20 – Revise seasonal high-water narrative and email to JS. GSL is proposing to place sufficient fill over wetland areas, and presumably other areas with a high-water table, to achieve the 6-foot separation. The log data for monitoring wells 13, 24 and 43 that are within the landfill footprint have recorded depths to water of 7.02 feet, 11.7 feet and 10.03 feet, respectively.

3/25 -Review Calex Environmental Consulting hydrogeological report sent to NHDES Waste Management Director, Michael Wimsatt, regarding release events at the North Country Environmental Services (NCES) Landfill Site in Bethlehem, New Hampshire.

3/26 - In my opinion, the soil test pit data are more reliable in determining the estimated seasonal high water than the drilled well data. Don't know why the soil data are ignored. Could be based on Michael Cuomo's (apparently erroneous) statement that "the presence of a dense basal till layer about two feet from the surface perches water briefly. This is **not considered groundwater saturation in the classic sense** [emphasis mine] as it comes from atmospheric water above, and does not continuously connect to the groundwater table below" (Site Specific Soil Map Report, p. 3, and elsewhere).

Whereas, "Groundwater" means water below the land surface in the zone of saturation of soil or rock and includes perched water separated from the main body of groundwater by an unsaturated zone. (Env-Sw 103.14). "Groundwater table" means the seasonally high surface of groundwater naturally occurring at atmospheric pressure. (Env-Sw 103.15). Soil test pit locations are on maps but are difficult to locate.

4/9 - ACOE Public Notice that the US Army Corps of Engineers has received a wetland permit application from Granite State Landfill (GSL, aka Casella). The link is: Granite State Landfill, LLC, Bethlehem, NH; File Number: NAE-2021-02240 [https://media.defense.gov/2024/Apr/09/2003434400/-1/-1/1/20240404\\_NAE-2021-02240\\_PUBLIC\\_NOTICE.PDF](https://media.defense.gov/2024/Apr/09/2003434400/-1/-1/1/20240404_NAE-2021-02240_PUBLIC_NOTICE.PDF)

4/10 - The estimated seasonal high-water issue appears to boil down to an inconsistency (between the soil scientist, Mike Cuomo, and the hydrogeologists) in defining what constitutes ground water (i.e., is a perched water table "ground water" for purposes of the NH Solid Waste rules?). I think this is resolved when one looks at the definition of ground water in the rules. What is probably more critical is - what is the best method for determining the depth to estimated seasonal high water (ESHW). In my opinion, it should be based on soil characteristics not well logs.

Of interest, The April-9 ACOE Public Notice, states "[t]he USACE has authority under Section 404 of the Clean Water Act (CWA), to regulate the discharge of fill into waters of the United States **which does not include trash or garbage** (33 CFR 323.2 (e)(3)). If the proposed infrastructure used to construct the landfill has the effect of filling jurisdictional waters, the infrastructure would be considered "fill material" for the purposes of Section 404. However, any subsequent disposal of solid waste into the landfill and/or discharges of leachate from the landfill **are not within the USACE's jurisdiction to regulate and are therefore not part of our permit review**". I think it



could be argued, from a 'cumulative impact' perspective, that both the placement of sand for 'infrastructure' and trash or garbage above the sand within five years should both be considered "fill material".

4/10 - The Corps and NHDES posted a Joint Outreach Public Notice for May 2024

[https://media.defense.gov/2024/Apr/10/2003435393/-1/-1/1/NH\\_JOINT\\_OUTREACH\\_PUBLIC\\_NOTICE-MAY\\_2024.PDF](https://media.defense.gov/2024/Apr/10/2003435393/-1/-1/1/NH_JOINT_OUTREACH_PUBLIC_NOTICE-MAY_2024.PDF)

4/11 - Muriel Robinette testified last week on proposed rules before the House E&A Committee that the weak link in the entire project is the infrastructure area. It is outside of the lined landfill, and similar in design to the NCES Landfill setup. There, leachate handling and spills are blamed for extensive groundwater contamination.

4/12 - Looks like we will not have a site visit, Casella won't allow any soil disturbance;

4/16 - GSL will need to submit a storm water pollution prevention plan (SWPPP) that should address the storage and handling of toxic substances, in this instance - especially leachate.

Provide comments directly to the Corps on behalf of DCC. The US EPA has "oversight" authority of the Corps process. Their primary tool is to 'elevate' the process if they feel the Corps has not done a responsible review. Their office is in the center of Boston. Not sure who is assigned to NH at this time, but pre-application meeting minutes will probably indicate who that person is, and what issues they raise. In the past, I have had one-on-one discussions with that person in Boston.

Frank DelGiudice, Corps Chief, will follow the letter of the law which requires looking at reasonably foreseeable future impacts as part of their cumulative impact assessment. This is usually interpreted to mean activities related to the project that are likely to occur, temporarily within the next five years or geographically within the same watershed (think industrial park). In this instance, I think a case may be made that an expansion is likely and should be included in the impact analyses. If not, require a condition in the permits that no further wetland impact for landfill development be allowed on the subject property.

4/24 - NHDES requests more information on Shoreland Permit Application 2024-00766; 5/6 - request a 30-day extension for public comments on the Corps wetland application; 5/8 - submit comments on the wetland application to ACOE; 5/24 - HB1620, the 2028 landfill moratorium bill, has been given new life as a House floor amendment to Senate bill SB134; 5/28 - The Corps has scheduled a public meeting in Dalton on the GSL application for June 26, 2024, and extended the comment period until July 3, 2024. See attached Public Notice for New Hampshire: Granite State Landfill, LLC, Hide Park, VT; File Number: NAE-2021-02240 [https://www.nae.usace.army.mil/Portals/74/NAE-2021-02240\\_PN\\_Public%20Meeting-.pdf](https://www.nae.usace.army.mil/Portals/74/NAE-2021-02240_PN_Public%20Meeting-.pdf); An earlier Public Notice today had it in Vermont, but not New Hampshire. Vermont: Granite State Landfill, LLC, Hide Park, VT; File Number: NAE-2021-02240 [https://www.nae.usace.army.mil/Portals/74/NAE-2021-02240\\_PN\\_Public%20Meeting-.pdf](https://www.nae.usace.army.mil/Portals/74/NAE-2021-02240_PN_Public%20Meeting-.pdf);

6/7 - NHDES, Watershed Management Bureau, has determined the Application for Water Quality Certification for the Granite State Landfill project submitted on April 19, 2024, is incomplete; 6/17 - In the April 19, 2024-supplemental response to NHDES, Casella adds a 2nd 459,000 gallon above-ground storage tank as a part of the GSL spill containment systems; by adding a 2nd tank of 459,000 gallons they may now have over 900,000 gallons of leachate on hand, in storage; 6/20 - Changes to the project design are problematic as, an example, a significant increase in impervious surfaces may require larger detention and infiltration basins to control stormwater flows to ensure there is no increase in storm water flows off the developed site. In my opinion the stormwater detention ponds are already undersized as they are designed for a 50-year storm event. This is insufficient based on the current frequency and intensity of storms. Also, upland areas on the site with the



required setback from wetlands are at a premium. Consequently, additional structures will need to be carefully located to ensure there is no additional wetland or buffer impact. Has a revised site plan been offered?

7/18 - Shoreland Impact Permit, issued July 18, 2024; 7/30-31 – review the Shoreland Application materials, draft appeal by the DCC to the NH Wetlands Council of the Permit, and other documents. My initial comments are below:

1. A Shoreland Permit is necessary for the GSL project to proceed. However, this permit should, at a minimum, be conditioned on all other applicable permits being approved. It is my opinion, that to allow the construction of shoreland 'improvements' when other permits are still being evaluated 'piecemeals' the permitting process and may authorize unnecessary shoreland impacts in the event any other GSL permit is denied. The construction of shoreland impacts should not be allowed to proceed unless all other permits for the GSL have been obtained and appeal deadlines have passed.
2. A rare, threatened and endangered (RTE) species survey has not been conducted but should be.
3. The Town of Dalton, which will experience increased traffic if the road improvements are constructed, was excluded from the Shoreland permit application notice and participation in the process. Out of curtesy, I believe the Town of Dalton should have been informed of this application as it will impact the Town.
4. I find CMA's response to the Ammonoosuc Local Advisory Committee (LAC) comment letter that "GSL declines to respond to comments that exceed the LAC's prescribed authority or the shoreland program's jurisdiction" is appalling. At a minimum, GSL is making a legal interpretation that may be erroneous but is clearly disrespectful to LAC members who serve without compensation to protect our public trust resource, the Ammonoosuc River. DES should give deference to the LAC and request GSL respond to each and every comment in the LAC letter.
5. With respect to Water Quality Certification (WQC) - GSL has submitted an application for WQC. DCC should request to be in the loop to review a draft WQC in order to suggest comments (contact Daniel J. Demers, Water Quality Certification Supervisor, and Philip Trowbridge, P.E., Manager, NHDES Land Resources Management Program). See 06.07.24 Incompleteness letter from DES.
6. Finally, it is my opinion that the Corps' Environmental Impact Statement (EIS), which evaluates the cumulative impact of GSL on all public interest factors, should be completed before any portion of the project is authorized. You may wish to contact Frank Del Giudice at the Corps (and copy our federal delegation) to ensure Dalton is apprised of progress on the EIS and given an opportunity to review and comment on a draft.

8/5 - Notice of Appeal, submitted to the NH Wetlands Council by the Dalton Conservation Commission, relative to Shoreland Impact Permit: 2024-00766, issued to Granite State Landfill LLC, July 18, 2024.

9/18 - Jeremy D. Eggleton, Esq. enters an appearance as counsel for the Dalton Conservation Commission relative to the above-referenced NHDES Wetlands File #2024-00766. Supporting documents are available via a ShareFile link. You should only have to enter your name and e-mail address to access the documents. <https://orren.sharefile.com/d-s8d6f5283bdb84681be807e9e0da91241>

10/3 – It is my opinion that Atty Manzelli's letter on the public roadway, Hunter Farm Road, is critical. Connecticut River Joint Commissions will comment on GSL. JS requests a report on the groundwater/wetlands conditions at the NCES Landfill, using the data provided by Casella/Sanborn Head in their recent groundwater report. The link to the full July 2024 NCES Groundwater report is:

<https://img1.wsimg.com/blobby/go/3a99e672-2796-498c-8250-9aae47365deb/downloads/a9d59459-7c23-4edd-ac92-3d0f4b825686/9%203%202024%20NCES%20SHA%20July%202024%20GW%20Report.pdf?ver=1727018295657>

11/27/2024 – Review documents and draft letter on the NCES landfill and its implications to the GSL. With the research and document review necessary to prepare this report, CVES has exhausted the retainer. However, no additional charges are pending, so our account is, as of now, paid in full.

1/28/2025 & 2/4/2025 – NH House Committee Hearings on HB171 & HB707, which would prohibit the Department of Environmental Services from permitting a new landfill in the state until 2030. This will allow the state time to address a myriad of solid waste issues, particularly the state's siting standards and the hundreds of thousands of tons of out-of-state waste dumped in New Hampshire landfills each year.



## Outlook

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**Reimbursement letter**

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**From** E Moore <Emoore@townofdaltonnh.gov>

**Date** Sun 11/2/2025 7:03 AM

**To** Conservation Chair <conservationchair@townofdaltonnh.gov>

**Cc** Conservation Commission <conservationcommission@townofdaltonnh.gov>; Town Admin <townadmin@townofdaltonnh.gov>; Jo Beth Dudley <jbdudley@townofdaltonnh.gov>; Thomas Dubreuil <tdubreuil@townofdaltonnh.gov>

Jon ,

We would like to know when they were on the property, a list of expenses ,we would also like canceled checks, would also like to see dates it was performed. Would like check numbers, would also like to know how the work performed benefit Dalton.

To whom the checks were written ,who approved all this, would like to see the finding.

thank

Eric