



To: Gardner Conservation Commission
From: North County Land Trust

July 29, 2022

Dear Gardner Conservation Commission members,

As President of the North County Land Trust (NCLT), I wish to add our voice to those of the many concerned Gardner and Templeton residents asking you to consider not issuing a permit on the Notice of Intent to expand the Gardner sludge landfill.

NCLT has been engaged with Gardner's land conservation efforts for over 20 years. Our Rome and Ebenezer Keyes Conservation areas preserve over 300 acres of wild land that enhances the lives of hundreds of Gardner's residents. Our Keyes Conservation Area lies within 1/3rd of a mile of the proposed expansion.

We echo the environmental concerns of others. We have studied the land in and around Keyes and can attest to its unique value. We know of the kettle hole bog (peatland) which the State has identified as a "priority natural community of great conservation concern" and we see Parker Pond, already impaired due to excess phosphorus above the Total Maximum Daily Load that the pond can manage. Both fragile entities. We know of an existing swath of intact forest that creates a safe east-west corridor for animals to travel to the Otter River. That corridor is located exactly where the expansion excavation would take place.

We ask you to fully consider whether enlarging the existing sludge landfill site to further encroach on vital wetlands, and public and private wells, is prudent. A 17-year solution is short by municipal terms. By the time the project is up and running, we'll have a few years of use (and added risk) and then we will be having this same discussion again. Now is the time to transition to new technologies that minimize the impact of sludge storage and can manage the kinds of emerging severe rain events that strain existing systems.

Clearly, no perfect solution to the question of how to deal with sewage sludge exists. As stressors on human existence build, restoring environmental health is our path to survival. We urge you to consider not issuing a permit for this NOI and seeking a better long-term solution for Gardner's needs. If we don't innovate now, we will surely repeat history, but with much less margin for error.

Thank you for your service to Gardner and all the communities downstream.

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