

TOWN OF ASHLAND WATER & SEWER DEPARTMENT

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January 28, 2016

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: New Hampshire Site Evaluation Committee (SEC) Docket No. 2015-06 Northern Pass Petition to Intervene

Dear Ms. Monroe:

We respectfully request to intervene in the SEC's proceedings under Docket No. 2015-06 relating to the proposed Northern Pass transmission line. Per the SEC's regulations, we are sending this request to you, with copies to the SEC's distribution list for this proceeding as noted in the "cc" to this email.

Northern Pass intends to install HVDC lines and eleven HVDC towers (#'s DC-1103 through DC-1113) across Town-owned land on which the Town of Ashland's Water and Sewer Department has its well field and Wastewater Treatment Facility. Both facilities are critical to the functioning of our town and key to our economic development. Since both facilities are fragile, we are concerned that they could be damaged during construction, and that construction and operation will interfere with current and future operations.

Well Field and Aquifer

The Town of Ashland's water supply is fed from an aquifer composed of a central esker surrounded by sand. The aquifer runs under the Pemigewasset River, across our well field, under the railroad to the other side of Interstate 93. The two town wells, a number of test wells, and monitoring equipment are installed at various points over the aquifer and the designated well protection area. This aquifer provides an almost unlimited supply of water, which is key to providing water for the town's residents and businesses, and is vital for future business development. Any damage that limits the flow of water would impair the health and welfare of the Town of Ashland.

The proposed construction of high voltage lines and multiple towers over our well field and aquifer raises several concerns for the Town of Ashland Water and Sewer Department:

- Proposed towers DC-1103 and DC-1104 are located on our town water well field and within our designated well protection area.
- The two main water supply lines for the town run from the well head under the path of the HVDC lines between towers DC-1103 and DC-1104.
- The proposed Northern Pass access road to the construction sites uses the town's access road to the well heads, monitoring equipment and test wells. We must have daily and emergency access to the well heads, monitoring equipment and all test wells. Constructing an alternate access road would be a considerable expense to the town and would require requesting an additional right-of-way across private property.

- EMF from the HVDC lines will interfere with our electronic monitoring and communication equipment.
- Passage of heavy construction equipment and supplies over our well field will disturb or damage the wells and aquifer.
- Excavation and construction of foundations (including the temporary pads) and the towers in the sandy soil will disturb or damage our wells and the aquifer.

Wastewater Treatment Facility

The septage lagoons at the Wastewater Treatment Facility were constructed in 1986 and are lined with clay. The Water and Sewer Department suspects that the lagoons were damaged during dredging in the 1990s, but do not know the extent of the damage. As a precaution, the Department installed test wells that are located in the area where the towers are to be installed.

The proposed construction of high voltage lines and towers alongside the septage lagoons (including a 100-foot tower within 100 feet of one lagoon) also raises serious concerns:

- There are 4 test wells located in the construction corridor between towers DC-1110 and DC-1112. These are accessed on a regular basis for monitoring, with reports submitted to NH DES. These test wells must remain accessible and undisturbed.
- Excavation and construction of foundations (including the temporary pads) and the towers in sandy soil so close to the lagoons could cause cracking and leakage of the lagoons.

Security Issues

- The Water and Sewer Department is working with Homeland Security to improve the security of the well field and Wastewater Treatment Facility which are designated as critical facilities. Security must be maintained during and after construction.
- Construction of the towers increases the possibility of our facility being a target due to the fact that both the electric grid and the water and sewer facilities could be destroyed at the same time.

Future Development

The Water and Sewer Department is currently developing plans for the upgrade of its facilities and operations. The construction of the proposed power lines and towers would negatively impact two major projects:

- A new Septage Receiving Station at the Wastewater Treatment Facility is planned for 2016 construction.
- A solar panel array on the well field is under consideration to provide power for the water and sewer facilities.

Thank you for your consideration of this petition to intervene.

Sincerely,



Ashland Water and Sewer Commission
Ellison Badger, Chair
Alan Cilley
David Toth

Cc: SEC Distribution List via Email