



The State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES



Clark B. Freise, Assistant Commissioner

Mr. David Toth  
Ashland Water & Sewer Department  
6 Collins Street  
Ashland, NH 03217

June 12, 2017

NHPUC 16JUN17PM2:01

RE: Ashland Sewage Lagoon Dam – D010010

Dear Mr. Toth:

The Department of Environmental Services (NHDES), Dam Bureau was contacted by Peter Roth of the New Hampshire Department of Justice's Environmental Protection Bureau relative to the potential impacts of the proposed alignment of the Northern Pass to the above referenced dam. Mr. Roth also serves as the state's public advocate for the project.

Of primary concern was how the installation of the proposed transmission lines might affect the Ashland Water & Sewer Department's (AW&S) ability to perform maintenance and repairs in the future. In addition, given the proximity of the lines to the western side of the lagoon system, there was a concern that the excavation and construction associated with the support towers could impact the lagoons' containment berms.

NHDES reviewed the information contained in its files, as well as the plan sheet that Mr. Roth provided in a June 2<sup>nd</sup> email, to determine what impacts, if any, might result from the proposed work. Currently, there are a series of poles supporting an existing transmission line. The plan sheet showing the proposed alignment shows that it will be placed to the west of the current lines and further from the lagoons. Our review also confirmed that the lagoon system is not ringed by an artificial embankment around its entire perimeter. In fact, only relatively short sections of the southern and southeastern sides of the lagoon system are considered jurisdictional dams in accordance with RSA 482:2II. The entire western side of the system (along the proposed transmission line alignment) is currently outside the limits of NHDES's jurisdiction.

Though unlikely, given the topography of the western side of the lagoon system, should the work involve considerable excavation and a permanent reduction in the ground surface elevation in close proximity to the lagoons there is a potential for creating a gradient for seepage to move in the direction of the Pemigewasset River. The Dam Bureau would be happy to perform a secondary review of the proposed work when the final alignment and specific construction details are available.

If you have any questions related to the information provided, please contact me at 271-1966 or by email at [steve.doyon@des.nh.gov](mailto:steve.doyon@des.nh.gov).

Sincerely,

Steve N. Doyon, PE, Administrator  
Dam Safety & Inspection Section

cc: Steven Whitley, The Mitchell Municipal Group PA  
Pamela Monroe, NHPUC Site Evaluation Committee ✓  
James. W. Gallagher, Jr., NHDES Dam Bureau

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