



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

March 11, 2016

Mr. Peter Rice
Director of Public Works – Utilities
City of Portsmouth
680 Peverly Hill Road
Portsmouth, NH 03801

RE: Peirce Island Wastewater Treatment Facility Upgrade

The proposed upgrade to the Peirce Island Wastewater Treatment Facility (WWTF) is a challenging yet vitally important undertaking that will have many far reaching effects on the health and environment of the City of Portsmouth and surrounding communities. I understand that the City has recently delayed a scheduled vote to authorize the bonding of \$75 million in project costs.

Alternatives to the proposed project at Pierce Island have been extensively studied over the years. One alternative that had been considered would convert the Peirce Island WWTF to a wet weather facility and would bring wastewater flows to Pease International Tradeport for treatment. This alternative, which was previously dismissed, is being touted as a viable alternative by those who are not in favor of the proposed Peirce Island upgrade. I am writing this letter to remind you of the many risks and concerns that would be problematic with a project at Pease and to encourage the City to stay the course in proceeding with the Peirce Island WWTF project as proposed.

Some points to consider are as follows:

Uncertainty of Discharge Location:

One key issue is the location of the outfall. Moving the outfall to Pease would be very challenging from a water quality perspective. The dilution rates at the current Peirce Island location are extraordinarily high. The dilution rates at Pease are much lower and that location is much closer to highly sensitive natural resources. There is a part of the Clean Water Act known as “antidegradation” which, to paraphrase, states that it is illegal to pollute an already polluted water or to cause an unpolluted waterbody to fail to meet water quality standards. The huge increase in flow at a Pease outfall would probably fail to meet this provision despite the improved treatment process. In addition, because of the nearby oyster beds and aquaculture farms in the Piscataqua River and Little Bay, moving the outfall to Pease could cause those facilities to be unable to harvest and sell their product.

There has been speculation about the opportunity to treat the city’s sewage at Pease for treatment and then pipe it back to Peirce Island to discharge. This would require double pipes bisecting the city, one pipe to bring the sewage from the south end to the north and the other to return the treated water. Alternatively, trenching down the Piscataqua River from Pease to Peirce Island could provide the access to a southern outfall. Either of these options will take a great deal of planning and permitting which will extend the time needed to bring Portsmouth into compliance

Peter Rice
March 11, 2016
Page 2 of 2

could provide the access to a southern outfall. Either of these options will take a great deal of planning and permitting which will extend the time needed to bring Portsmouth into compliance with its court ordered treatment plant upgrade. Given the current conditions in the river and estuary, we are concerned that further delay will be detrimental to aquatic resources in the area.

Financing Considerations:

The proposed project at Peirce Island has been listed on the 2015 Project Priority List and is eligible for funding that would include approximately \$4 million of loan principal forgiveness. This eligibility is strictly for the project at Peirce Island. State and Federal Rules relating to the State Revolving Fund (SRF) require a complete application by June 30, 2016. The project specific application must include final design plans and an environmental assessment. The proposed project at Peirce Island is on track to meet the deadline for this funding.

In order for a project at Pease to be considered, the project must be included in the 2016 Project Priority List. DES will solicit project proposals for the 2016 List in May of this year. The 2016 list will then receive public input before the new list is finalized in September. Until such time, it will not be possible to determine the amount of funds available, nor how principal forgiveness will be distributed. Until this process is complete, DES cannot guarantee what amount of funding and amount of principal forgiveness will be available. The current 20-year interest rate of 2.552% is also subject to change for projects on the next priority list.

Impacts of Construction:

Moving the treatment process to Pease would not eliminate all of the negative impacts associated with the construction of a project at Peirce Island. The Peirce Island facility would still need to be repurposed to serve as a wet weather flow facility. While this would reduce the construction traffic, it would not be eliminated. In fact, more severe construction impacts would be expected due to the likely need to construct piping to transport flows to Pease and back to Peirce Island.

As stated at the beginning of this letter, the Peirce Island WWTF project is a vitally important project to the City of Portsmouth and surrounding communities. Years of studies and analyses have included evaluations of many alternatives including the possibility of treating flows at Pease International Tradeport. The City now needs to take the final step to authorize final construction. Based on the excellent work completed to date by your staff and engineering consultants, the Peirce Island WWTF upgrade is ready to begin this summer. Delaying this project further, in order to consider alternatives, does not provide any guaranteed benefits, only greater risks and potentially much higher costs to the community. I encourage the City to stay on course with this project as planned.

Sincerely,



Eugene J. Forbes, P.E.
Director, Water Division