GREAT BAY MUNICIPAL COALITION

April 23, 2018

VIA FEDERAL EXPRESS & EMAIL
Alexandra Dunn, Regional Administrator
USEPA Region 1 – New England
5 Post Office Square
Mail Code: ORA01-4
Boston, MA 02109-3912

RE: Updated Information Regarding Eelgrass Response to Nitrogen Reduction in Great Bay System

Dear Regional Administrator Dunn:

The Coalition hereby submits the attached updated information on eelgrass growth as a supplement to our earlier correspondence in furtherance of the development of appropriate NPDES permits for Great Bay Municipal Coalition communities. This information should also assist EPA in evaluating whether eelgrass recovery has occurred in response to systemwide nitrogen reduction, as indicated by one participant at the April 2, 2018 PREP meeting. Our March 19, 2018 correspondence and attached comprehensive report concluded that further studies and data are necessary to better understand whether and how nutrients may be affecting this system. As noted in our comprehensive report, systemwide eelgrass acreage has not rebounded substantially since the major eelgrass bed losses caused by the 2006 Mother's Day Storm, despite some of the lowest total and inorganic nitrogen levels on record – reflecting a level of water quality that EPA has recognized as good to excellent for eelgrass propagation. The recently released 2017 eelgrass mapping data for Great Bay (attached) unfortunately confirm that eelgrass populations continue to remain well below pre-Mother's Day Storm acreage, regardless of the subsequent water quality improvements. The new data and comparison overlay map of the past two years reveal that the levels of eelgrass in both the Bay and Harbor areas have either stayed the same or slightly decreased from 2016 to 2017. The major area of eelgrass bed loss in the southwestern corner of Great Bay (near the mouths of the Lamprey and Squamscott Rivers) continues to show no apparent recovery.

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We hope that you find this additional information helpful in the development of pending and future permitting decisions.

Sincerely,

Dean Peschel

Dean Peschel

Attachment