From: Andrews, Jeff <Jeffrey.Andrews@des.nh.gov>

Sent: Tuesday, February 06, 2018 7:35 AM

To: Gaito, Danielle

Subject: FW: PSNH Schiller - EPA Question re: Eelgrass - please provide comments by tomorrow

Wed Jan 10th

FYI. See email string below with the response from our watershed management bureau on the eelgrass question.

Please let me know if you need anything else on this.

Thanks, Jeff

Jeffrey G. Andrews, P.E. Industrial Permits Engineer Wastewater Engineering Bureau NH Department of Environmental Services

Tel: (603) 271-2984 Fax: (603) 271-4128

E-mail: Jeff.Andrews@des.nh.gov

From: Diers, Ted

Sent: Tuesday, January 09, 2018 11:24 AM **To:** Comstock, Gregg; Wood, Matt; Couture, Steve

Cc: Andrews, Jeff

Subject: RE: PSNH Schiller - EPA Question re: Eelgrass - please provide comments by tomorrow Wed Jan 10th

That statement is accurate as far as I know. We generally are not trying to get eelgrass where it never grew.

Ted Diers, Watershed Management Bureau NH Department of Environmental Services 603-271-3289

From: Comstock, Gregg

Sent: Tuesday, January 09, 2018 9:57 AM **To:** Diers, Ted; Wood, Matt; Couture, Steve

Cc: Andrews, Jeff

Subject: PSNH Schiller - EPA Question re: Eelgrass - please provide comments by tomorrow Wed Jan 10th

Hi guys,

Please see Jeff's email below regarding EPA's draft response to comments for the PSNH Schiller Station NPDES permit and provide him with comments by 4 pm tomorrow (Wednesday) January 10th.

Thanks for your help.

G

Gregg Comstock, P.E.

Supervisor, Water Quality Planning Section

NH Department of Environmental Services, Watershed Management Bureau

29 Hazen Drive, PO Box 95 Concord, NH 03302-0095 603-271-2983 gregg.comstock@des.nh.gov

From: Andrews, Jeff

Sent: Tuesday, January 09, 2018 9:30 AM

To: Comstock, Gregg

Subject: PSNH Schiller - EPA Question re: Eelgrass

Hi Gregg, below is the clipped section from the latest response to comments that I mentioned to you on the phone just now. Do you agree with the statement? Also, anything that you guys want to add to or change in EPA's language on this?

installed in an area "where New Hampshire hopes to reestablish eelgrass habitat" and questions if the screens "will be compatible with returning this area to eelgrass habitat." Sierra Club did not provide a reference for, hor was EPA able to corroborate, the assertion that New Hampshire "hopes" to reestablish eelgrass habitat in the relatively limited area that would be occupied by the wedgewire screens nor that this area has ever historically supported eelgrass habitat. The Great Bay Estuary Eelgrass Mapper, which presents the results of eelgrass surveys back to 1948, indicates that eelgrass has never been recorded in the vicinity of Schiller Station's CWISs (where the proposed screens will be located), and recent surveys (2013 to 2016) have not observed eelgrass in the vicinity of the station. The closest recorded occurrence of eelgrass was a relatively small patch (about 7,200 ft²) observed about 900 feet upstream from the CWISs in surveys in 2001 and 2002.⁶⁸ The benthic habitat in the relatively limited area in front of the CWISs will be disturbed during installation of the screens, although to EPA's knowledge there is currently no eelgrass in this area that would be impacted. The airburst mechanism could potentially limit growth of new eelgrass at the screens, but it's influence on the waterbody is limited to the area of the screen installation and is unlikely to conflict with restoration or natural growth of eelgrass outside of this relatively small area. For this reason, EPA does not believe that the wedgewire screens would be incompatible with eelgrass growth outside of the limited area in front of Schiller Station's CWISs. As there are likely more desirable areas targeted for restoration, the

Comment [GI this statement?

Thanks, Jeff

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