

Great Bay Nitrogen Issue Update

December 3, 2014



Summary

- History
- Recent Events
- Future Efforts
- Recommendations

History

- 2009 NHDES Numeric Nutrient Criteria
- 2010 GB estuary listed as impaired for Nitrogen
- Formation of Great Bay Municipal Coalition
- EPA Issuance of Draft NPDES permits
- Coalition challenge of Criteria and Permit Limits
 - Good Science
 - Legal Appeals
 - Political Support

History

- Independent Peer Review of NHDES Nutrient Criteria
 - Jointly commissioned by Coalition and NHDES
 - Four Reviewers were nationally recognized experts
 - Reviewed Criteria Document and all available data and completed studies
- Peer Review Results
 - The available data does not support that nitrogen is causing eelgrass loss in GB estuary
 - Criteria did not adequately consider other factors that could be the cause of eelgrass loss

Recent Events

- NHDES has agreed not to use Nutrient Criteria
- EPA Meeting
- Dover / Coalition Accomplishments
 - Reduce nitrogen at WWTP's
 - Invest in monitoring and research
 - River sampling last 3 years
 - Developed a hydrodynamic model of estuary
 - Supported Eelgrass mapping
 - Non point source reduction

Future Efforts

- Development of a Water Quality model of the estuary
- Continue to fund field monitoring and studies
 - Answer questions
 - Track progress as improvements are made

Recommendations

- EPA appears determined to impose Nutrient limits using a methodology with questionable scientific foundation.
- City Council letter to EPA supporting SAB review.
- City Council urge State and Federal Delegations to send letters to EPA supporting the SAB review.