

Appendix F – NH Natural Heritage Bureau (NHNHB) Coordination

CONFIDENTIAL – NH Dept. of Environmental Services review



NH NATURAL HERITAGE BUREAU
NHB DATACHECK RESULTS LETTER

Memo

To: Lindsay Matras, VHB
2 Bedford Farms Drive Suite 200
Bedford, NH 03110-6532

From: Amy Lamb, NH Natural Heritage Bureau

Date: 7/18/2019 (valid for one year from this date)

Re: Review by NH Natural Heritage Bureau

NHB File ID: NHB19-2211

Description: Town: Dover, Newington

Location: Along NHDOT right-of-way.
Project would involve replacing the superstructure with a steel girder system with a structural steel frame extending from the bottom of the girders to the top of the existing piers. The existing piers would be preserved without requiring significant modification. Bridge replacement would require the temporary placement of causeways on either side of the bridge structure, as well as the temporary placement of piers, to facilitate bridge removal.

cc: Kim Tuttle

As requested, I have searched our database for records of rare species and exemplary natural communities, with the following results.

Comments: Please contact the NH Fish & Game Department to address wildlife concerns. Please continue to work with NHB to address rare plant concerns. A site visit may be helpful to review for the listed plant species and examine existing conditions.

Natural Community

Sparsely vegetated intertidal system

State¹ --

Federal --

Notes

Threats to these communities are primarily alterations to the hydrology of the wetland (such as alterations that might affect the sheet flow of tidal waters across the intertidal flat) and increased input of nutrients and pollutants in storm runoff.

Subtidal system

State¹ --

Federal --

Notes

Threats to these communities are primarily alterations to the hydrology of the wetland (such as alterations that might affect the sheet flow of tidal waters across the intertidal flat) and increased input of nutrients and pollutants in storm runoff.

Plant species

prolific yellow-flowered knotweed (*Polygonum ramosissimum* ssp. *prolificum*)*

State¹ E

Federal --

Notes

Threats to estuarine plants are primarily alterations to the hydrology of the wetland, such as ditching or tidal restrictions that might affect the sheet flow of tidal waters across the intertidal flat, activities that

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Division of Forests and Lands
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Concord, NH 03301

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NH NATURAL HERITAGE BUREAU
NHB DATACHECK RESULTS LETTER

Memo

smooth black sedge (*Carex nigra*)*

E --

Notes

eliminate plants, and increased input of nutrients and pollutants in storm runoff.
The largest threat to this species is loss of habitat.

Vertebrate species

Atlantic Sturgeon (*Acipenser oxyrinchus*)

State¹ T

Federal T

Notes

Contact the NH Fish & Game Dept and the US Fish & Wildlife Service (see below).

Cliff Swallow (*Petrochelidon pyrrhonota*)

T --

Federal --

Notes

Contact the NH Fish & Game Dept (see below).

Shortnose Sturgeon (*Acipenser brevirostrum*)

E

Federal E

Notes

Contact the NH Fish & Game Dept and the US Fish & Wildlife Service (see below).

¹Codes: "E" = Endangered, "T" = Threatened, "SC" = Special Concern, "--" = an exemplary natural community, or a rare species tracked by NH Natural Heritage that has not yet been added to the official state list. An asterisk (*) indicates that the most recent report for that occurrence was more than 20 years ago.

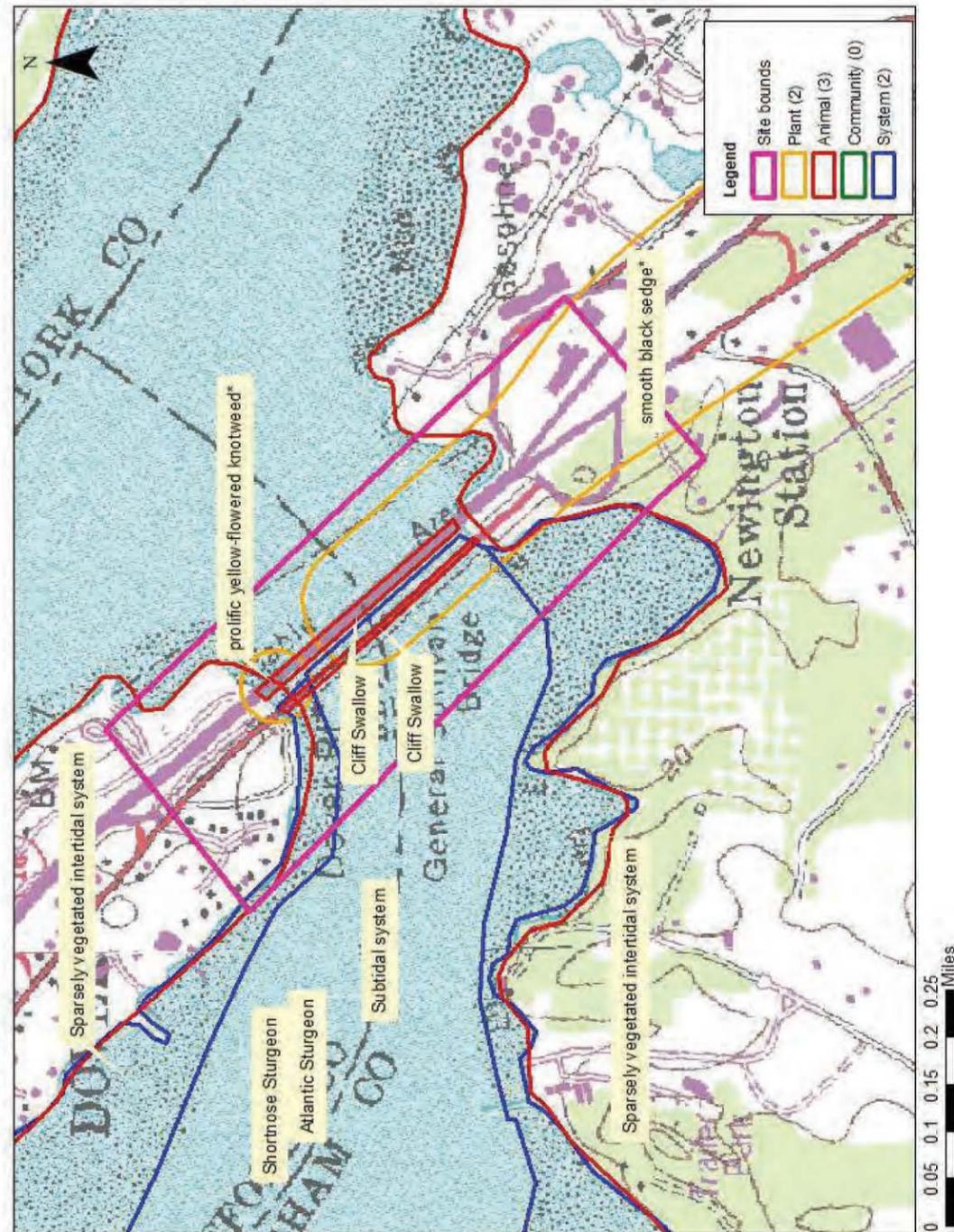
Contact for all animal reviews: Kim Tuttle, NH F&G, (603) 271-6544.

A negative result (no record in our database) does not mean that a sensitive species is not present. Our data can only tell you of known occurrences, based on information gathered by qualified biologists and reported to our office. However, many areas have never been surveyed, or have only been surveyed for certain species. An on-site survey would provide better information on what species and communities are indeed present.

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NHB19-2211



THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF TRANSPORTATION



Victoria F. Sheehan
Commissioner

William Cass, P.E.
Assistant Commissioner

July 29, 2019

Amy Lamb
NH Natural Heritage Bureau
DNCR – Forests & Lands
172 Pembroke Road
Concord, NH 03301

RE: NH DataCheck Report (NHB19-2211)
General Sullivan Bridge Project
Spaulding Turnpike / Little Bay Bridge: NHS-027-1(037), 11238S
Newington and Dover, New Hampshire

Dear Ms. Lamb:

The New Hampshire Department of Transportation (NHDOT) is planning to rehabilitate or replace the General Sullivan Bridge (GSB) located over the Little Bay. The GSB was most recently used as a pedestrian bridge connecting Dover with Newington over the Little Bay, and NHDOT is seeking to continue to provide pedestrian/bike access along this route. In preparation for the rehabilitation/replacement work, NHDOT and FHWA are preparing a Supplemental Environmental Impact Statement (SEIS) for the project. The SEIS will consider an analysis of the project's impacts to rare, threatened, or endangered species known to occur within the project area. Below is a brief project overview, followed by a description of state-listed threatened or endangered species managed by the NH Natural Heritage Bureau (NHNHB).

Project Overview

The GSB was built in 1934 and connected Newington and Dover, New Hampshire, over the Little Bay. Although originally designed to support two lanes of highway traffic over the mouth of the Little Bay, the bridge was closed to vehicular traffic in 1984, when the adjacent Little Bay Bridge, located east of the GSB, was completed. Now the bridge is closed even to pedestrian and bicycle traffic due to a recent inspection completed in September 2018, which found additional deterioration of a critical floor beam under the bridge deck.

The condition of the GSB has been declining over the last few decades. To address this issue, options for the rehabilitation or replacement of the GSB were previously reviewed in a 2007 Final Environmental Impact Statement (FEIS) and a 2008 Record of Decision (ROD), which were produced by NHDOT and the Federal Highway Administration (FHWA) under the National Environmental Policy Act (NEPA). In the ROD, NHDOT and FHWA committed to maintain pedestrian/bicycle connectivity between Dover and Newington, and to accomplish that by rehabilitating the GSB.

Since the 2008 ROD, further inspections and studies of the GSB condition were completed to prepare for the rehabilitation project. The information gathered by these inspections and studies revealed that the GSB was more deteriorated than originally thought. Bridge rehabilitation would have very high costs, high risks, and a limited life span. Therefore, NHDOT and FHWA are proceeding to further evaluate rehabilitation and consider other alternatives; these alternatives and their environmental and cultural resource impacts will be presented in a Supplemental Environmental Impact Statement (SEIS) currently in preparation.

Of the various alternatives being considered in the SEIS, the current Preferred Alternative is Alternative 9 – Superstructure Replacement (Girder Option), which involves complete removal and replacement of the GSB

superstructure. Under Alternative 9, the GSB superstructure would be replaced with a steel girder system with a structural steel frame extending from the bottom of the girders to the top of the existing GSB piers. Alternative 9 would reuse the existing piers without requiring significant modifications. This approach eliminates permanent impacts to intertidal and subtidal habitat. Plans of the Preferred Alternative are attached.

Construction of the Preferred Alternative is expected to take approximately 18 months. Construction would begin with a one- to two-week period of installing a temporary causeways and trestles west of the existing GSB for staging and equipment access during the bridge replacement work. The bridge would be removed and replaced using these causeways, the trestles, and water craft. Upon completion of the bridge replacement, the causeways and trestles would be removed, and the area restored to pre-construction conditions, which is anticipated to take approximately one to two weeks. The causeways and trestles are considered a temporary impact within the Little Bay and are the only in-water work that is proposed. We've attached a plan that depicts the construction phase impacts but note that these plans are for planning purposes only and may be modified during construction if required to allow for safe and efficient contractor access.

NHF&G Species Resources Summary

A NH Natural Heritage Bureau (NHNHB) DataCheck report was generated for the project on July 18, 2019 (NHB19-2211). This report indicated the presence of two systems, sparsely vegetated intertidal system and subtidal system, as well as two plant species, prolific yellow-flowered knotweed (*Polygonum ramosissimum* spp. *prolificum*) and smooth black sedge (*Carex nigra*) in the vicinity of the proposed project.

Plant Species

The NHNHB report indicates prolific yellow-flowered knotweed under the GSB and Little Bay Bridges in Hilton Park, as well as smooth black sedge south of the GSB in Newington. Coordination with the NHNHB initially occurred in 2012 (see attached NHNHB memo dated July 27, 2012), at which time NHNHB conducted surveys within wetland areas along the Spaulding Turnpike south of the GSB. During the 2012 surveys, smooth black sedge was found within five wetlands along the Turnpike. Additional coordination with NHNHB occurred in 2016. In a memo from you which relayed information regarding surveys you conducted for smooth black sedge and prolific yellow-flowered knotweed (refer to attached NHNHB memo dated October 11, 2016), you indicated that the area where prolific yellow-flowered knotweed was historically known to occur has been heavily impacted by the construction of the Little Bay Bridges. No smooth black sedge plants were discovered during the survey conducted in 2016, however you indicated that the survey was conducted within the latter end of the ideal survey window for this species.

Smooth Black Sedge: Although smooth black sedge was found within Newington in 2012, this species is only known to occur in freshwater wetland habitats. No freshwater wetlands will be impacted by the project; while one wetland would be impacted by the project in Newington, this wetland is located along the shoreline of Little Bay and is likely to contain brackish water due to its location. This wetland is immediately south of the pedestrian on/off ramp and south of the water crossing which drain via a deeply cut channel to the Little Bay shoreline. This wetland is composed of a series of interconnected palustrine emergent ditches. Due to the wetland's proximity to Little Bay and presence within a tidal area, the wetland is not suitable habitat for smooth black sedge. Therefore, we believe it is unlikely that smooth black sedge is located within the area of proposed temporary impact.

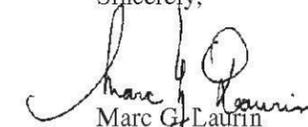
Prolific Yellow-Flowered Knotweed: As indicated in the NHNHB memo dated October 11, 2016, the presence of prolific yellow-flowered knotweed under the GSB and Little Bay Bridges was previously impacted and therefore not observed. No additional surveys for this species have been completed since 2016, however it is NHDOT's understanding that this species is no longer present within Hilton Park. Temporary impacts associated with a temporary access road and staging area within uplands along the Dover side of the GSB would be limited to areas west of the GSB.

Systems

The NHNHB report indicated that the project spans a sparsely vegetated intertidal system and subtidal system. The proposed in-water work would impact both of these systems. The NHDOT has coordinated with the National Oceanic and Atmospheric Administration (NOAA) regarding the proposed impacts to fish and marine habitat. Additionally, coordination with the NH Fish & Game Department (NHF&G) Marine Program is ongoing. Proposed impacts to jurisdictional wetlands where these systems are located will be noted in the Draft SEIS.

Please let me know if you have any specific concerns regarding these species and systems located within or near the project area, or if you recommend any additional plant surveys. Any recommendations regarding best management practices or mitigation will be included in the SEIS. We look forward to continuing coordination with you on this project.

Sincerely,



Marc G. Laurin
Senior Environmental Manager
Room 109 – Tel (603) 271-4044
E-mail – marc.laurin@dot.nh.gov

Attachments:

NHNHB DataCheck Report (NHB19-2211)
Alternative 9 Construction Impact Plan
Figure 2 – Conceptual Design Rendering
Representative Site Photographs
NHNHB Memo – July 27, 2012
NHNHB Memo – October 11, 2016

cc: Keith Cota, NHDOT
Jamie Sikora, FHWA
P. Walker, VHB
G. Goodrich, VHB

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Matras, Lindsay

From: Laurin, Marc <Marc.Laurin@dot.nh.gov>
Sent: Thursday, November 7, 2019 3:47 PM
To: Walker, Peter; Matras, Lindsay; Beato, Hannah
Subject: [External] FW: Newington-Dover, 11238S - NHB Resources General Sullivan Bridge Project
Attachments: NHB-photos_10-03-19.pdf

FYI

From: Lamb, Amy
Sent: Thursday, November 07, 2019 3:38 PM
To: Laurin, Marc
Subject: RE: Newington-Dover, 11238S - NHB Resources General Sullivan Bridge Project

Hi Marc,

Thank you for sending this information. On October 3, 2019, NHB reviewed the site, focusing survey efforts along the shoreline where rare brackish species could occur. NHB examined both the north (Dover) and south (Newington) approaches, with an emphasis on less-impacted areas west of the existing bridge, while also reviewing the locations of the proposed temporary stone fill causeways.

There are small areas of tidal marsh west of the bridge, on both the Dover and Newington sides. NHB collected and reviewed plant material from these marshes, but did not positively identify any State-Listed plant species. In Dover, there was little vegetation in the immediate vicinity of the proposed stone fill causeways, and in Newington, this area contained mostly invasive and/or weedy species. Please see attached photos. No plant species of concern were found within proposed impact areas. NHB has no further concerns about the project as proposed.

Best,
Amy

Amy Lamb
Ecological Information Specialist
(603) 271-2834
amy.lamb@dncr.nh.gov

NH Natural Heritage Bureau
DNCR - Forests & Lands
172 Pembroke Rd
Concord, NH 03301

From: Laurin, Marc <Marc.Laurin@dot.nh.gov>
Sent: Monday, July 29, 2019 2:10 PM
To: Lamb, Amy <Amy.Lamb@dncr.nh.gov>
Cc: Cota, Keith <Keith.Cota@dot.nh.gov>; Jamie Sikora <jamie.sikora@dot.gov>; Peter Walker <pwalker@vhb.com>; Goodrich, Gregory <GGoodrich@VHB.com>
Subject: Newington-Dover, 11238S - NHB Resources General Sullivan Bridge Project

Amy,

NHDOT is evaluating the replacement or rehabilitation of the General Sullivan Bridge (GSB) located over the Little Bay to continue to provide pedestrian/bike access along this route. NHDOT's Preferred Alternative involves the complete removal and replacement of the GSB superstructure, and an SEIS is being prepared that considers the project's impacts to environmental resources. Attached is current information regarding the project for your review.

Please let me know if you have any specific concerns or recommendations for inclusion in the SEIS on the plant species and natural communities identified in the NHHNB database review. Coordination with NHF&G department on vertebrate species is on-going.

Thanks,

Marc



Existing bridge abutment, and proposed location of temporary stone fill causeway. (Dover, north side)



View toward existing abutment in Newington, and location of proposed temporary causeway.



Existing abutment in Dover, facing west to show existing conditions.



View of rocky substrate and weedy vegetation around Newington abutment.

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NH Natural Heritage Bureau
NHB Datacheck Results Letter

Memo

To: Hannah Beato, Vanasse Hangen Brustlin, Inc.
101 Walnut Street
Watertown, MA 02471

From: Amy Lamb, NH Natural Heritage Bureau

Date: 2/8/2021 (valid until 02/08/2022)

Re: Review by NH Natural Heritage Bureau

Permits: NHDES - Shoreland Standard Permit, NHDES - Wetland Standard Dredge & Fill - Major, USACE - General Permit, USCEQ - Federal, NEPA Review, USEPA - Stormwater Pollution Prevention

NHB ID: NHB21-0203 Town: Dover, Newington Location: Along NHDOT right-of-way
Description: NHDOT and FHWA propose to replace the General Sullivan Bridge located over Little Bay in Newington and Dover, NH. The Project would involve replacing the superstructure with a steel girder system with a structural steel frame extending from the bottom of the girders to the top of the existing piers. The existing piers would be preserved without requiring a substantial modification. Bridge replacement would require the temporary placement of causeways on either side of the bridge structure, as well as the temporary placement of piers, to facilitate bridge removal.

cc: Kim Tuttle

As requested, I have searched our database for records of rare species and exemplary natural communities, with the following results.

Comments NHB: Please continue to coordinate with NHB.
F&G: Please continue to coordinate with NHFG.

| Natural Community | State ¹ | Federal | Notes |
|--------------------------------------|--------------------|---------|--|
| Elgrass bed | -- | -- | |
| Sparsely vegetated intertidal system | -- | -- | Threats to these communities are primarily alterations to the hydrology of the wetland (such as alterations that might affect the sheet flow of tidal waters across the intertidal flat) and increased input of nutrients and pollutants in stormrunoff. |
| Subtidal system | -- | -- | Threats to these communities are primarily alterations to the hydrology of the wetland (such as alterations that might affect the sheet flow of tidal waters across the intertidal flat) and increased input of nutrients and pollutants in stormrunoff. |

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NH Natural Heritage Bureau
NHB Datacheck Results Letter

Memo

Plant species

| State ¹ | Federal | Notes |
|--------------------|---------|--|
| E | -- | Threats to estuarine plants are primarily alterations to the hydrology of the wetland, such as ditching or tidal restrictions that might affect the sheet flow of tidal waters across the intertidal flat, activities that eliminate plants, and increased input of nutrients and pollutants in stormrunoff. |
| E | -- | The largest threat to this species is loss of habitat. |

Vertebrate species

| State ¹ | Federal | Notes |
|--------------------|---------|---|
| T | T | Contact the NH Fish & Game Dept and the US Fish & Wildlife Service (see below). |
| T | -- | Contact the NH Fish & Game Dept (see below). |
| E | E | Contact the NH Fish & Game Dept and the US Fish & Wildlife Service (see below). |

¹Codes: "E" = Endangered, "T" = Threatened, "SC" = Special Concern, "--" = an exemplary natural community, or a rare species tracked by NH Natural Heritage that has not yet been added to the official state list. An asterisk (*) indicates that the most recent report for that occurrence was more than 20 years ago.

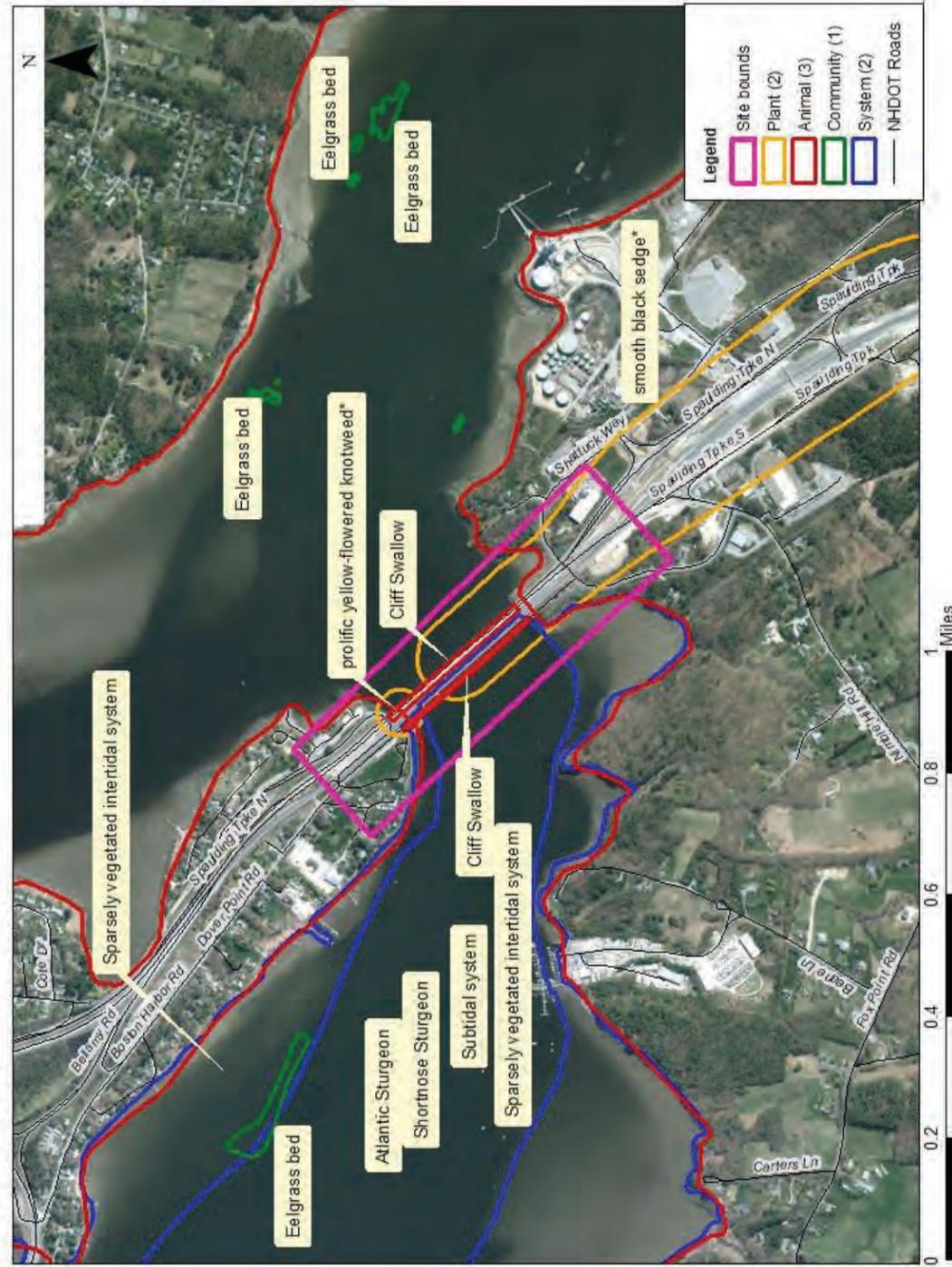
Contact for all animal reviews: Kim Tuttle, NH F&G, (603) 271-6544.

A negative result (no record in our database) does not mean that a sensitive species is not present. Our data can only tell you of known occurrences, based on information gathered by qualified biologists and reported to our office. However, many areas have never been surveyed, or have only been surveyed for certain species. An on-site survey would provide better information on what species and communities are indeed present.

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DNCR/NHB
172 Pembroke Rd.
Concord, NH 03301

NHB21-0203



Beato, Hannah

From: Lamb, Amy <Amy.E.Lamb@dncr.nh.gov>
Sent: Wednesday, March 31, 2021 10:17 AM
To: Laurin, Marc
Cc: Reczek, Jennifer; Walker, Peter; Beato, Hannah
Subject: [External] RE: Newington-Dover, 11238S - General Sullivan Bridge Replacement and Eelgrass Locations, NHB21-0203

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Marc,

Thank you for clarifying the meaning of the 2000 x 800 ft project area footprint as the potential area for direct/indirect impacts.

There are three locations where eelgrass beds have been documented in the general vicinity of the project. Their distances to the bridge itself are as follows:

- Westerly population – 2800 ft
- Easterly population – 1700 ft
- Northeasterly population – 2800 ft

While one of these populations is within the 2000 ft area of potential impacts, NHB does not expect impacts to eelgrass beds as a result of this project based on the following information in the documents provided:

Will SAV be impacted?

“Kelp beds and macroalgal beds will be temporarily impacted by the placement of causeways and trestles in the project area. Additionally, the NH Coastal Viewer was used to identify the nearest eel grass bed to the project area, which is over 500 feet away. No direct or indirect impacts are anticipated to occur to eelgrass.”

Will turbidity increase?

“The causeways and trestles are expected to take approximately one to two weeks to install and remove. Mitigation measures, such as turbidity curtains, may be placed around the area of in-water impact if determined necessary to prevent sedimentation and turbidity effects.”

Will water quality be altered?

“With the use of standard BMPs for marine construction, no significant water quality degradation of any EFH is expected. Any impacts are likely to be limited to a temporary increase in turbidity and suspended solids. Because of substantial tidal exchange and normal river flows, water quality at the project site is expected to return quickly to its pre-disturbance condition. Minimal, temporary water quality impacts may occur during the in-water construction phases of the project since the temporary causeways and trestles may disturb bottom sediments. This in-water work to install and remove the causeways/trestle is anticipated to take approximately one to two weeks at the start and end of the bridge replacement work.”

Please contact NHB if anticipated work areas, impact areas, or project methods change such that impacts to eelgrass could occur.

Best,
 Amy

From: Laurin, Marc <marc.g.laurin@dot.nh.gov>
Sent: Tuesday, March 30, 2021 7:47 AM
To: Lamb, Amy <Amy.E.Lamb@dncr.nh.gov>
Cc: Reczek, Jennifer <Jennifer.E.Reczek@dot.nh.gov>; 'Walker, Peter' <PWalker@VHB.com>; Hannah Beato <hbeato@VHB.com>
Subject: RE: Newington-Dover, 11238S - General Sullivan Bridge Replacement and Eelgrass Locations

Amy,

The footprint of the project itself is localized as shown on the plans. It is more specifically identified as the project limits. Those are the areas that will have direct temporary or permanent impacts associated with the construction itself.

The 2,000 feet waterbody and 800 feet land areas are better characterized as the extent of the potential impacts, likely indirect, that may occur during construction outside the project limits. The project area is evaluated to identify environmental and/or cultural resources that may be present and could be affected by the construction activities; such as sedimentation, noise or construction access to the project.

Marc

From: Lamb, Amy <Amy.E.Lamb@dncr.nh.gov>
Sent: Monday, March 29, 2021 2:18 PM
To: Laurin, Marc <marc.g.laurin@dot.nh.gov>
Cc: Reczek, Jennifer <Jennifer.E.Reczek@dot.nh.gov>; 'Walker, Peter' <PWalker@VHB.com>; Hannah Beato <hbeato@VHB.com>
Subject: RE: Newington-Dover, 11238S - General Sullivan Bridge Replacement and Eelgrass Locations

Hi Marc,

Thank you for sending this supplemental information, it is very helpful.

I just have one clarifying question: On page 3 of the pdf (Appendix E-5), it states that "The project area footprint is currently defined as the GSB and surrounding Little Bay waterbody within 2,000 feet of the bridge, as well as land areas approximately 800 feet north and south of the Newington and Dover bridge abutments." Can you explain why the project area is defined as within 2,000 feet of the bridge when the plans address a much more localized area?

Thank you,
Amy

From: Laurin, Marc <marc.g.laurin@dot.nh.gov>
Sent: Monday, March 29, 2021 8:02 AM
To: Lamb, Amy <Amy.E.Lamb@dncr.nh.gov>
Cc: Reczek, Jennifer <Jennifer.E.Reczek@dot.nh.gov>; 'Walker, Peter' <PWalker@VHB.com>; Hannah Beato <hbeato@VHB.com>
Subject: RE: Newington-Dover, 11238S - General Sullivan Bridge Replacement and Eelgrass Locations

Amy,

Attached is information on the anticipated construction phase impacts, including an excerpt from the Essential Fish Habitat Assessment Worksheet, which provides supplemental information about the project and the in-water work that is anticipated to be conducted. A total of 0.75 acres of disturbance is estimated to occur for the construction of the

causeway with an estimated 50 temporary 14 inch diameter steel piles to support the two trestles. As noted the plans are for planning purposes and may be modified.

Let me know if you need more information or clarification.

Thanks,

Marc

From: Lamb, Amy <Amy.E.Lamb@dncr.nh.gov>
Sent: Thursday, March 25, 2021 9:46 AM
To: Laurin, Marc <marc.g.laurin@dot.nh.gov>
Cc: Reczek, Jennifer <Jennifer.E.Reczek@dot.nh.gov>; 'Walker, Peter' <PWalker@VHB.com>; Hannah Beato <hbeato@VHB.com>
Subject: RE: Newington-Dover, 11238S - General Sullivan Bridge Replacement and Eelgrass Locations

Hello Mark,

Thank you for reaching out about the potential for the project to impact eelgrass beds, which were recently added to the NHB database and not included in past DataChecks for this project.

Regarding the potential for impacts to eelgrass beds from temporary changes in tidal velocities and sedimentation from in-water work, do you have any graphics or other information that would help illustrate the minor nature of the anticipated impacts?

Could you send additional information about the standard marine construction BMPs that would be in place wherever feasible?

Thank you,
Amy

From: Laurin, Marc <marc.g.laurin@dot.nh.gov>
Sent: Thursday, March 25, 2021 9:35 AM
To: Lamb, Amy <Amy.E.Lamb@dncr.nh.gov>
Cc: Reczek, Jennifer <Jennifer.E.Reczek@dot.nh.gov>; 'Walker, Peter' <PWalker@VHB.com>; Hannah Beato <hbeato@VHB.com>
Subject: Newington-Dover, 11238S - General Sullivan Bridge Replacement and Eelgrass Locations

Amy,

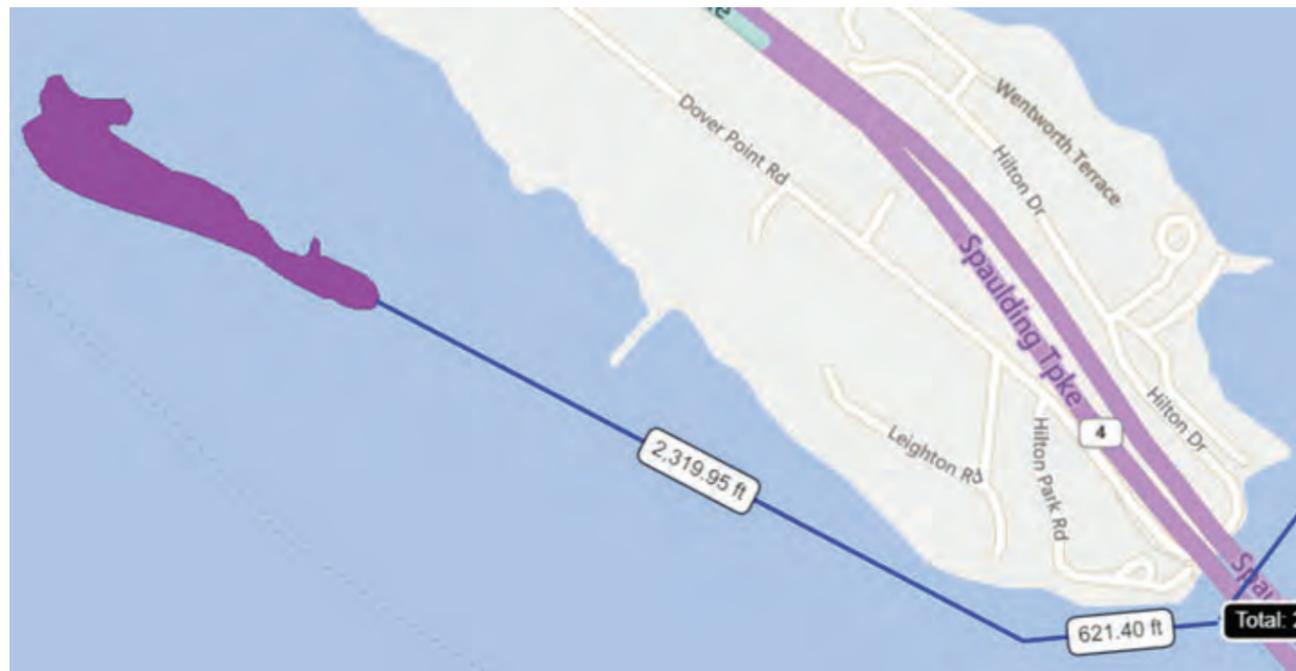
As you may recall, NHDOT and FHWA are preparing a Supplemental EIS for the rehabilitation or replacement of the General Sullivan Bridge (GSB) over Little Bay in Newington and Dover, NH. Our consultant recently ran a new NHB DataCheck because the previous report had expired(see attached). The only difference between the previous report and the updated report is the identification of eelgrass beds within the Piscataqua River and Little Bay. I am reaching out to discuss the potential impacts of the GSB Project and the sedimentation potential for any eel grass beds.

The project would require the temporary placement of causeways and trestles adjacent to the existing bridge from both banks to facilitate bridge removal and new construction. The Project will cause temporary, in-water disturbance from installation and removal of the proposed causeways and trestles for construction access. The installation and removal of these structures over a one- to two-month period may cause limited sedimentation. Specifically, placement of the causeways and trestles involve temporary alterations to the currents of Little Bay at a localized scale and would cause minor changes in tidal velocities. Current flows in the Project Study Area are complex and have a wide range of directional

components and speeds during the tidal cycle. These tidal flow characteristics were studied during the preparation of the 2007 Final Environmental Impact Statement. Tidal flows, currents, and wave patterns are not expected to be permanently altered as a result of the temporary impacts associated with construction access. Any changes to tidal flow, currents, and wave patterns due to the placement of the causeways and trestles would be temporary and minor.

BMPs would be implemented to mitigate the potential for suspension of sediments and consequent siltation during in-water construction. Based on correspondence with NOAA's Greater Atlantic Regional Fisheries Office, the following list of environmental commitments would be implemented to protect the water quality and aquatic habitat of Little Bay, and reduce risk of impact to aquatic species:

- A drainage and erosion control plan for all shoreside construction would be implemented, including BMPs to control and capture silt-laden stormwater runoff.
- Standard marine construction BMPs would be implemented wherever feasible to mitigate the potential for suspension of sediments and consequent siltation.
- The contractor would be directed to divert runoff to temporary erosion check dams or to capture runoff using silt fences, hay bales, silt socks, mulch filter berms, or temporary detention basins.
- Areas of soil disturbance would be seeded and mulched as quickly as possible after initial grading.
- The contractor would be required to inspect all construction BMPs on a daily basis to ensure that they are properly installed and maintained.
- Standard BMPs will be used for in-water and shoreside construction to address potential fuel or oil spills from the construction equipment, and to mitigate the potential for suspension of sediments and consequent siltation.



Based on the distance to the nearest eelgrass beds, approximately 1,800 feet to the east and 2,900 feet to the west, the very limited impacts and durations of the in-stream work, we conclude that the potential impacts to eelgrass beds is unlikely. Please let us know if you concur, or if you feel additional conservation measures or coordination is necessary. We hope to include your response in the Draft Supplemental EIS which we intend to print on April 5. If you are not able to respond by then, you will have the opportunity to comment on the project during the Public Hearing, anticipated to be held in May 2021, and during its comment period.

Let me know if you need further information.

Thanks,