From: Seth Engelbourg
To: Jeff Carlson
Subject: Widgeon Grass - Response to TON Sesachacha Pond NOI
Date: Tuesday, January 25, 2022 11:42:06 AM

Hi Jeff,

Please forward the information and links below to the rest of the commission, have it entered in the packet, and confirm that it has been distributed.

I have significant concerns regarding the proposed Widgeon Grass (*Ruppia maritima*) removal NOI at Sesachacha Pond using benthic barriers. Widgeon Grass is a native, beneficial flowering plant. It is characterized as a submerged aquatic vegetation (SAV) similar to Eelgrass (*Zostera marina*). Widgeon Grass communities have been recognized as being a nursery for many commercially and ecologically important species of fish and shellfish. It is also a favored and nutrient-rich food for migratory waterfowl, with populations of some species such as Brant being closely tied to the availability of healthy SAV beds. Additionally, as a true-flowering plant (not a seaweed or algae) it plays an important role in aquatic oxygen and nutrient cycling and also helps maintain the physical substrate of the pond bottom. Removing a beneficial native species for the purposes of recreation is adverse to the interests protected in the WPA and the Nantucket local regs. I understand that eutrophication is an issue that should be addressed in Sesachacha Pond, but the removal of Widgeon Grass is not the right way to do it. If there was a similar proposal to blanket and remove Eelgrass, I think the public and every commissioner would have serious reservations, Widgeon Grass is ecologically-similar and functionally just as important.

Resources:

- https://www.mass.gov/doc/submerged-aquatic-vegetation-brochure/download
- https://gobotany.nativeplanttrust.org/species/ruppia/maritima/
- https://www.chesapeakebay.net/news/blog/the_more_the_merrier_when_it_comes_to_underwater_grass_species_in_the_bay
- https://dnr.maryland.gov/waters/bay/Documents/SAV/widgeon_grass.pdf
- https://www.mass.gov/doc/classification-of-the-natural-communities-of-massachusetts/download (Pages numbered 299-300 in the document)
- https://www.mass.gov/doc/310-cmr-1000-the-wetlands-protection-act/download
    - MA WPA: Land Under the Ocean. Pages 147-149. WPA specifically indicates: (6) Projects not included in 310 CMR 10.25(3) which affect land under the ocean shall if water-dependent be designed and constructed, using best available measures, so as to minimize adverse effects, and if non-water-dependent, have no adverse effects, on marine fisheries habitat or wildlife habitat caused by: (a) alterations in water circulation; (b) destruction of eelgrass (Zostera marina) or widgeon grass (Rupia maritina) beds; (c) alterations in the distribution of sediment grain size; (d) changes in water quality, including, but not limited to, other than natural fluctuations in the level of dissolved oxygen, temperature or turbidity, or the addition of pollutants; or (e) alterations of shallow submerged lands with high densities of polychaetes, mollusks or macrophytic algae.

    - Although I do not believe that this NOI technically falls in Land Under the Ocean, that section specifically calls out eliminating or reducing adverse effects to Widgeon Grass. Since Sesachacha Pond is seasonally opened to the ocean, thus functioning temporarily as 'Land Under the Ocean' it seems not in the interests of the WPA to remove it.
- https://www.nantucket-ma.gov/DocumentCenter/View/1008/Conservation-Commission-Wetland-Regulations-2013-PDF
    - Nantucket Regs: Salt Ponds. Pages numbered 34-35 in the document. Performance Standard 2.07.B.1: The work shall be done in accordance with procedures determined by the Commission to have no adverse effect on wildlife, fisheries, shellfish, existing water quality, recreation, or wetland scenic views and so as not to pollute the pond or alter the critical characteristics of salt ponds.
    - This work will have adverse effects on wildlife, fisheries, and shellfish due to the removal of a food source and nursery habitat.

Additionally, I do not think the resource areas have been fully represented. This project would also likely be within Land Containing Shellfish, Fish Runs, Buffer Zone to the Coastal Beach, Buffer Zone to Coastal Dune, maybe others. Each of those resource areas have additional performance standards that would apply but include the protected interests of wildlife, shellfish, and fisheries. Lastly, I do not see record of abutter notifications in this NOI. Were they sent? There are multiple ownership parties in that area, including the conservation organizations; Mass Audubon and Nantucket Land Bank whose properties will be affected by this project.

Best,
Seth

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