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August 12, 2017

Patti Kellogg, DEP Environmental analyst  
Southeast Regional Office  
20 Riverside Dr.  
Lakeville, MA  
02347

Dear Ms. Kellogg:

I wrote "The Hydrology of Tisbury Great Pond" August 2013, based on 30 years of measurements and I am pleased with the DEP's concern regarding the health of Tisbury Great Pond, Martha's Vineyard, MA. I have studied the Massachusetts Estuaries Project Technical Report( Howes et al 2013), on which you have based your July 2017 DRAFT, and have sent letters (June 12, 2013, February 22, 2013 and March 28, 2013) to Brian Howes and MA DEP with my analysis of the 2013 report. In response to your July 2017 DRAFT -Tisbury Great Pond Black Point Pond Estuarine System, I submit the following facts.

The concentration of nitrogen (TDN) as measured by the Martha's Vineyard Commission at the mid point of the pond in the months of July, August and September, 2011 to 2015, has averaged 0.30 ppt, significantly less than your target limit of 0.46 ppt.

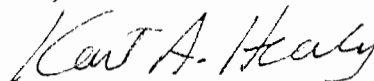
Eel grass has never grown in the brackish water of the main pond and only in patches just inside the barrier beach where there can be considerable inflow to the pond of ocean wave runoff. The presence or absence of eel grass is not an indicator of pond health.

Calculations of the present nitrogen load in the ground water entering the pond are based on an assumption of rain recharge of the ground water of 2.4 feet per year, whereas 1.5 feet per year is a more realistic amount and results in the calculation of much less nitrogen entering the pond (Healy 2013).

There have been incidents of algae growth during the last 20 years but oysters, clams and blue claw crabs have been abundant.

The Riparian Owners of Tisbury Great Pond, the Towns conservation and shell fish committees and the Martha's Vineyard Commission will continue to monitor the pond water and the Commissioners, elected by the Riparian Owners, will continue to open the pond to the ocean as appropriate for the health of the pond.

cc West Tisbury and Chilmark, Selectmen and Conservation committees, Martha's Vineyard Commission

  
Kent A. Healy PE

AUG 14 2017