Municipal Alliance for Adaptive Management

GREAT BAY COMMUNITIES OF NEW HAMPSIRE

June 17, 2022

ADDRESSEE AND TITLE
MUNICIPALITY
ADDRESS

Mr./Mrs./Ms.

As you are aware, in November of 2020 the EPA issued a Great Bay Total Nitrogen General Permit (NPDES Permit No. NHG58A000). Soon after this permit was issued the Cities of Dover, Portsmouth, and Rochester led the development of an Intermunicipal Agreement. Since then, four other Great Bay Communities joined and the Municipal Alliance for Adaptive Management (MAAM) was formed. Six of the MAAM communities submitted a joint Adaptive Management Plan, and one submitted an individual plan, pursuant to the General Permit. After the submission of the Adaptive Management Plans, the Conservation Law Foundation (CLF) sent a letter to the EPA expressing concern with some of the Great Bay communities minimal work towards compliance with the General Permit, and references "CLF's ability to petition EPA to evoke the coverage under the permit for any municipality that is not making reasonable progress in reducing nitrogen pollution." The EPA responded to CLF stating that "failure by a municipality to reduce [stormwater and nonpoint source nitrogen loads] may result in EPA removing them from the coverage by the TNGP and adding a more stringent numeric nitrogen limit to their individual NPDES permit."

MAAM has been working over this past year using the combined efforts of all of our communities, NHDES, CLF, EPA, and other stakeholders to achieve success under the General Permit for everyone. We are committed to providing funding, training, and public outreach opportunities for our smallest members and the MAAM group at large. In their letter, CLF recognized this "significant effort" and EPA "encourage[s] the permittees . . . if they're not already doing so – to participate in the MAAM." It is clear that our inclusion of CLF and EPA in MAAM meetings has fostered a constructive relationship committed to the health of the Great Bay Estuary.

It is with this that we once again invite you to join MAAM. Please reach out with any questions and we look forward to working with you.

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Gretchen Young, PE

MAAM Chair