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March 5, 2020

Hon. Governor Christopher Sununu

Governor of New Hampshire

State House

107 N. Main Street

Concord, NH 03303

Dear Governor Sununu:

On January 7, 2020, the United States Environmental Protection Agency (EPA) publicly released the Great Bay Total Nitrogen General Permit, NPDES Permit No. NHG58A000, 2020 Draft General Permit. The City of Dover has had a chance to review the Draft General Permit and will be submitting written comments to EPA about various aspects of the Draft General Permit.

The Draft General Permit represents an important step forward in helping to protect Great Bay, but there are concerns about the scientific basis for the 100 kg per hectare per year loading threshold in the Draft General Permit. We respectfully request that the State undertake a peer review of the 100 kg/ha/yr loading threshold, after which the final permit can benefit from and incorporate the findings.

Due to the potential impact of the permit on the Dover community and our members, we urge our State leaders to work with the affected communities to undertake a comprehensive and scientific peer review that could potentially lead to less costly options.

Thank you for your careful consideration of this request, as the Draft General Permit will have a significant effect on our community if implemented in its current form.

Sincerely,

Margaret Joyce
GCCC President

Kelly Glennon
GDCC Board Chair

cc: Robert R. Scott, NH DES Commissioner