

removal. Any attempts to operate these facilities other than within design parameters may produce unknown and unwanted results.

During winter months NBC's WWTFs discharge higher levels of nitrogen than during the nitrogen permit season (May – October). These increased nitrogen loadings are a factor of varying weather conditions and resulting process changes that are needed to maintain a healthy, functioning biomass during the colder months while also assuring that this biomass can withstand the seasonal change into the warmer months. NBC's two WWTFs must always be operated within design parameters that will assure compliance with permit requirements.

NBC supports the recommendation of the RIDEM (March 18, 2024) and those of URI's Department of Fisheries, Animal and Veterinary Sciences (March 28, 2024). NBC however, for reasons stated above, cannot support recommendations with respect to increasing nitrogen discharges from WWTFs. In closing, NBC is sympathetic to Rhode Island's commercial quahoggers and will continue its work to help ensure that Narragansett Bay is protected from municipal wastewater and stormwater pollutants. To the extent we can continue to measure and quantify water quality in the Bay, participate in Bay improvement research efforts, and coordinate shellfish transplants we remain at the service of the Commission and future efforts to help support Rhode Island's shell-fishing industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurie Horridge', with a long horizontal flourish extending to the right.

Laurie Horridge
Executive Director