



# ANNUAL REPORT

FY 2021

CONNECTICUT • MAINE • MASSACHUSETTS • NEW HAMPSHIRE • NEW YORK • RHODE ISLAND • VERMONT



**NEIWPCC [NŪ-Ē-PĪK]**  
is a regional commission  
that helps the states of  
the Northeast preserve  
and advance water  
quality.

### Vision

Clean and sustainable water throughout  
the Northeast.

### Values

Leadership • Collaboration • Education •  
Service • Science

### Water Program Priorities

- Contaminants of emerging concern
- Watershed planning and waterbody protection
- Infrastructure and State Revolving Fund
- Clean Water Act modernization
- Training and certification for environmental professionals

## LEADERSHIP

October 1, 2020 to September 30, 2021

### Executive Director

**Susan J. Sullivan**, Lowell, Massachusetts

### Division Directors

**Mary Berner**, Human Resources • **Samantha James**, Business Operations • **Amy Magin**, Communications and Outreach  
**Richard Friesner**, Water Quality • **Heather Radcliffe**, Water Resource Protection  
**Christina Stringer**, Wastewater and Onsite Systems • **Lucia Walker**, Financial

### Our Commissioners

Chair: **Mark Klotz** • Vice Chair: **Peter LaFlamme** • Treasurer: **Harry Stewart**

#### Connecticut

**Katie Dykes**, Department of Energy and Environmental Protection Commissioner

Representing Ms. Dykes: **Jennifer Perry**, Water Planning and Management

**Manisha Juthani**, Department of Public Health Commissioner

Representing Ms. Juthani: **Lori Mathieu**, Drinking Water Section

Direct Appointment of the Governor: **Michael Bisi, Denis Cuevas, Jane Stahl**

#### Maine

**Melanie Loyzim**, Department of Environmental Protection Commissioner

Representing Ms. Loyzim: **Brian Kavanah**, Bureau of Water Quality

**Jeanne Lambrew**, Department of Health and Human Services Commissioner

Representing Ms. Lambrew: **Michael Abbott**, Maine Center for Disease Control & Prevention

Direct Appointment of the Governor: **David Van Slyke, Brian Tarbuck, Stacy Thompson**

#### Massachusetts

**Martin Suuberg**, Department of Environmental Protection Commissioner

Representing Mr. Suuberg: **Kathleen Baskin**, Bureau of Water Resources

**Margret R. Cooke**, Department of Public Health Commissioner

Representing Ms. Cooke: **Jan Sullivan**, Bureau of Environmental Health

Direct Appointment of the Governor: **Paul Hogan, John Sullivan, F. Adam Yanulis**

#### New Hampshire

**Robert R. Scott**, Department of Environmental Services Commissioner

Representing Mr. Scott: **Rene Pelletier**, Water Division

Direct Appointment of the Governor: **Thomas Ballestero, Frederick McNeill, Nelson Thibault, Robert Varney**

#### New York

**Basil Seggos**, Department of Environmental Conservation Commissioner

Representing Mr. Seggos: **Mark Klotz**, Division of Water

**Howard Zucker**, Department of Health Commissioner

Representing Mr. Zucker: **Roger Sokol**, Bureau of Water Supply Protection

Direct Appointment of the Governor: **Richard Lyons**

#### Rhode Island

**Terrance Gray**, Department of Environmental Management Director (Acting)

Representing Mr. Gray: **Sue Kiernan**, Office of Water Resources

**Nicole Alexander-Scott**, Department of Health Director

Representing Ms. Alexander-Scott: **Amy Parmenter**, Office of Drinking Water Quality

Direct Appointment of the Governor: **Janine Burke-Wells, Russell Chateaufneuf**

#### Vermont

**Peter Walke**, Department of Environmental Conservation Commissioner

Representing Mr. Walke: **Peter LaFlamme**, Watershed Management Division

**Mark Levine**, Department of Health Commissioner

Representing Mr. Levine: **Lori Cragin**, Environmental Health Division

Direct Appointment of the Governor: **Dennis Lutz**

Commissioners at the end of fiscal 2021: **Deidre S. Gifford** (Conn.), **Yvonne Bolton** (Conn.), **Renee D. Coleman-Mitchell** (Conn.), **Monica Bharel** (Mass.), **Jana Ferguson** (Mass.), **Tom O'Donovan** (N.H.), and **Janet Coit** (R.I.) also served as commissioners in the fiscal year.



# FROM THE EXECUTIVE DIRECTOR



In April of 2020, about a month after the start of the COVID-19 pandemic, NEIWPCC rolled out a strategic plan for the first time in our nearly 75-year history. This plan includes a set of critical objectives and strategic goals, informed by the most pressing clean water challenges facing the region, so that we may continually improve our service to our member states. Our 2021 annual report is organized around these objectives and goals, summarizing some of

NEIWPCC's major programs and spotlighting some of our new initiatives and achievements.

At the end of the fiscal year, I asked my staff to think about how their work falls into NEIWPCC's strategic plan. I was overwhelmed by the detailed responses I received. It's important to me that NEIWPCC has a culture where every one of our employees — whether a field researcher, program manager, trainer, educator, or administrative professional — feels connected to NEIWPCC's mission and goals, and empowered to find new ways to continue advancing clean water in the region that are in line with their unique talents and passions.

NEIWPCC's portfolio of work — from blue carbon research on the Hudson River Estuary, to behavior change campaigns to reduce lawncare fertilizer use in the Long Island Sound watershed, to the creation of a new youth advisory committee in the Lake Champlain basin, to cross-programmatic dialogues on climate change — is so diverse, it is impossible to touch on

all the individual contributions made by our incredible team in this annual summary. Nevertheless, I would like to take this opportunity to thank each and every one of NEIWPCC's employees for their continued dedication to their work. While the COVID-19 pandemic has tested NEIWPCC's strength, it has only proved the value of this interstate commission, and how it is through our model of partnership that we are uniquely positioned to be responsive, adaptive, and innovative in our approach to serving the region, no matter the challenge. Every single member of our team possesses these traits, and I believe that having a strategic plan to guide us during this period of unprecedented change has helped to keep us all connected to our work and greater impact.

A blue ink handwritten signature of Susan J. Sullivan.

Susan J. Sullivan, Executive Director

## Thank You to Our Chair

NEIWPCC thanks outgoing chair Mark Klotz for his leadership during the last two years. Klotz recently retired as director of the New York State Department of Environmental Conservation Division of Water after 12 years with the division. He has been an invaluable member of NEIWPCC's executive committee and we are grateful for his service to the region.



# WHERE WE SERVE

NEIWPCC works throughout New England and New York in collaboration with the U.S. Environmental Protection Agency, state environmental agencies, and our program partners. We provide funding, staff and other support for clean water projects in the region.

Our headquarters are based in Lowell, Massachusetts, with a satellite office in South Portland, Maine. NEIWPCC supports:

- Hudson River Estuary Program (HREP)
- Hudson River National Estuarine Research Reserve (HRNERR)
- Lake Champlain Basin Program (LCBP)
- Long Island Sound Study (LISS)
- Maine Department of Health and Human Services' Drinking Water Program
- Maine Joint Environmental Training Coordinating Committee (JETCC)
- Narragansett Bay Estuary Program (NBEP)
- New York State's Source Water Assessment and Protection Program
- New York State Department of Environmental Conservation's Division of Water
- New York City's combined sewer overflow (CSO) abatement project
- Peconic Estuary Partnership (PEP)
- Rhode Island Department of Environmental Management (RIDEM)



## HOW WE WORK

Our work and impact fall into five interconnected categories:

**Connections:** We engage and convene water quality professionals and other stakeholders across the Northeast to collaborate on clean water and environmental science challenges across shared regions, ecosystems, and areas of expertise.

**Protection:** We conduct research into water-related topics, monitor environmental factors, and fund such work by others. We also implement and fund environmental restoration and other on-the-ground projects.

**Training:** We develop, coordinate, and conduct training courses that serve water quality professionals regionally and nationwide.

**Education:** We fund and/or staff programs that engage the public through events, exhibits, web and print publications, and other outreach activities.

**Engagement:** We actively represent the interests of member states at meetings with federal and state officials and in regional and national water and wastewater associations.



# EXPERTS IN OUR FIELD

■ **Katie DeGoosh-DiMarzio** (RIDEM) was interviewed on Resiliency Radio about invasive species spread prevention and a new solar boat wash station in Rhode Island.

■ **Maryann Dugan** (Lowell) joined the board of directors for the New Hampshire Rivers Council.

■ **Richard Friesner** (Lowell) moderated a session of the Association of Clean Water Administrators mid-year meeting.

**Friesner** also presented “Progress in Water Quality...But Still More Work to Do” for the Climate Change Initiative, a research center at the University of Massachusetts, Lowell.

■ **Colleen Hickey** (LCBP) was recognized by the EPA Region 1 with a 2020 Environmental Merit Award for her accomplishments benefiting the communities and ecosystems of the Lake Champlain Basin.

■ **Don Kennedy** (Lowell) was honored by the EPA Region 1 with a Lifetime Achievement Award for his many years of providing training and technical assistance to wastewater

professionals in New England. Kennedy was also honored by the New England Water Environment Association (NEWEA) with the 2020 James J. Courchaine Collection Systems Award. The award recognizes outstanding efforts and dedication in the collection systems field.

■ **Megan Lung** (HREP) completed the Pattern for Progress 2020-2021 fellowship on environmental racism in the Hudson Valley. She co-authored the group’s final report, “Achieving Diversity, Equity, and Inclusion in the Hudson Valley.”

**Lung** was also presented with a Recognition of Resilience and Distinctive Service Award by the town of Esopus, New York.

■ **Dan Rearick** (HREP) co-authored a paper, “Pathway-Based Approaches for Assessing Biological Hazards of Complex Mixtures of Contaminants: A Case Study in the Maumee River,” in the April 2021 issue of “Environmental Toxicology and Chemistry.”

■ **Julia Twichell** (NBEP) won the Best Interagency Collaboration Award from Esri, a geographic information system (GIS) software provider, for a StoryMap she created with colleagues at the EPA. The map, “How Do We Use Our Coasts?,” can be viewed through the NBEP’s GIS Data Hub.



## CRITICAL OBJECTIVE: **ENGAGEMENT**

Use our data, resources, and network to encourage the public, policymakers, and other influencers to support our vision of clean water managed sustainably throughout the Northeast.

- STRATEGIC GOALS:**
- Establish initiatives and partnerships that anticipate or react quickly to rising environmental issues.
  - Translate scientific research into environmental applications.

### **Executive Committee and Commission**

In fiscal 2021, NEIWPCC continued to host frequent conference calls for our executive committee — the heads of the water divisions in each of our member states’ environmental agencies — and EPA Region I and II representatives, helping them respond quickly to rising environmental challenges. Topics included the COVID-19 pandemic response, regional salt pollution coordination, antidegradation water quality regulations, fish hatchery regulations, combined sewer overflow right-to-know legislation and practices, and wastewater cybersecurity.

In the fall of 2021, we also hosted a webinar series for our commissioners to learn about and help make progress on NEIWPCC’s critical objectives and strategic goals.

### **Environmental Surveillance for COVID-19**

Our staff are monitoring efforts across the country to use wastewater-based epidemiology to trace COVID-19, also known as environmental surveillance, with the goal of helping our states explore how to use this public health tool for pandemic preparation and response. Staff attended webinars and conducted research on technical aspects of this tool and held several discussions with our commissioners throughout the fiscal year.

Christina Stringer, director of wastewater and onsite systems, also served as a preceptor for two public health graduate students from Tufts University, who conducted statistical analyses comparing wastewater data to COVID-19 case rates in three communities in Connecticut, Maine, and Massachusetts.

### **Chlorides and Road Salt Pollution**

NEIWPCC launched a new collaborative to help our member states address chloride contamination in drinking water and surface water, which is caused primarily by application of salt to roads, parking lots, and sidewalks. Household and industrial water softening systems also contribute to this problem.

While the states in the Northeast have diverse approaches to addressing chloride impairments in their waters, there are many areas of overlapping need. NEIWPCC supported our states in several ways during the year, including by facilitating discussions for environmental officials, hosting webinar presentations, working on a resource database, and exploring regional education and outreach opportunities.

### **PFAS “Forever Chemicals”**

Per- and polyfluoroalkyl substances (PFAS) continue to be one of the most critical and quickly developing environmental challenges of the age. Our staff has been following the latest research on PFAS pollution and holding regular discussions with our states, helping them coordinate efforts to monitor, regulate, and remove these “forever chemicals” that persist in our waterbodies, wastewater, and drinking water.

Much of NEIWPCC’s efforts this year focused on PFAS in wastewater residuals, especially the land application of biosolids, as states are working quickly to respond to, and deal with the ramifications of, the fast-paced changes in regulations and public perspective.

### **Regional Representation**

As new clean water issues and national priorities arise, NEIWPCC works closely with our member states to provide a regional perspective on proposed water policies to federal parties such as the EPA or Congress. This past year, we provided comments on regulatory issues such as wetlands protections, streamgauge monitoring, and water and wastewater infrastructure, including fish hatcheries.



## Work Groups & Collaboratives

- Chlorides collaborative
- Contaminants of emerging concern
- Harmful algal blooms
- Long Island Sound Study nitrogen coordination
- Massachusetts training and advisory committee
- National Pollutant Discharge Elimination System
- New England biological assessment of wetlands
- Nonpoint source pollution
- Northeast aquatic biologists
- Onsite wastewater
- Source water protection
- Stormwater
- Total maximum daily loads
- Tracking and accounting collaborative
- Underground/leaking underground storage tanks
- Underground storage tanks tribal workgroup
- Volunteer monitoring
- Wastewater residuals
- Wastewater training and certification
- Water quality standards
- Water resource adaptation and climate change
- Wetlands





## Our First Virtual Conference Reached a Wider Audience

The annual Northeast Aquatic Biologists (NAB) Conference, our first virtual conference, drew more attendees from in and outside the region than ever before. More than 230 environmental professionals participated in 2021, compared to about 140 in 2020. Registrants could choose from both live and pre-recorded sessions to watch, on topics such as biomonitoring, chloride, cyanobacteria, lake monitoring, and restoration.

Several NEIWPCC staff members shared their research at the event. **Matthew Vaughan**, technical coordinator for the Lake Champlain Basin Program, presented on water quality data collection in Lake

Champlain. Environmental Analyst **Megan Lung** shared progress she and her colleagues have made on aquatic barrier removals in the Hudson River Estuary. Analyst **Charles Stoll** shared his research showing increasing chloride concentrations in New York's rivers and streams over the last 40 years.

The virtual format also allowed for participation from Martyn Kelly, a leading ecologist in the United Kingdom, to present a comparison of biomonitoring practices and standards in the U.S. and the U.K.

NEIWPCC's annual Nonpoint Source Conference was also held virtually, in May of 2021. About 160 people attended, many from far outside the Northeast, including from Texas, South Carolina, Ohio, Kentucky, and Guam, and several tribal staff. Topics included floodplain restoration, stormwater education and outreach, land protection, and watershed planning.





## Partnerships in Action

Through **The Institute Discovering Environmental Scientists (TIDES)** program, 15 high school and college students conducted environmental research projects along the banks of the Hudson River and in freshwater tidal wetlands examining water quality,

plant life, and fish biological diversity of the estuary. NEIWPCC staff at our Hudson River locations supported the innovative summer field research and laboratory science program.

NEIWPCC supported the completion of an updated comprehensive conservation and management plan for the **Peconic Estuary Partnership (PEP)**. This document will guide PEP's work

for the next decade and focuses on strong partnerships, resilient communities, clean water, and a healthy ecosystem. NEIWPCC also supported the **Narragansett Bay Estuary Program** as they update their ten-year management plan, "Vision 2032."

NEIWPCC helped the **Long Island Sound Study (LISS)** complete a five-year conservation

and management progress report that was submitted to Congress in June, and to create an action plan for the next five years. The report to Congress shows that LISS and its partners are making significant strides towards their goals: from pollution reductions to habitat restoration, to community engagement, climate resilience, new research, and partnerships.



*Youth from the TIDES program.*



## CRITICAL OBJECTIVE:

# WORKFORCE DEVELOPMENT

Deliver programs and services that attract and retain a diverse, talented group of water quality professionals to our staff, as well as to the field as a whole.

- STRATEGIC GOALS:**
- Build a more diverse and inclusive water quality workforce.
  - Draw upon our organizational values to strengthen culture and create a sense of community for staff.
  - Recruit young professionals to the staff and to the field.
  - Offer online continuing education courses to support the needs of rural member states and to expand national reach.
  - Standardize external training programs across the Northeast around shared best practices.
  - Develop youth education programs that support workforce development and awareness objectives.

## Justice, Diversity, Equity, and Inclusion

During our 2021 All Staff Meeting, NEIWPCC held a working session to brainstorm actions the organization can take towards our workforce development goals. As a result of that meeting, NEIWPCC established an internal Justice, Diversity, Equity, and Inclusion (JDEI) Task Force, a platform for staff across our different programs and locations to collaborate on JDEI and environmental justice issues.

The task force focused on creating a strong foundation to guide the group's efforts. At the close of fiscal 2021, the group was working on several initiatives, including the establishment of organizational definitions for justice, diversity, equity, and inclusion, and the creation of affinity groups: employee resource groups for staff who share a

common identity to build community.

Earlier in the year, NEIWPCC's executive committee and commission also endorsed a stronger JDEI commitment statement for the organization.

## Commitment to Clean Water for All

A key component of NEIWPCC's mission is recognizing communities with lower socioeconomic status and those with larger minority populations who disproportionately contend with serious water quality issues and threats to their access to clean and safe water. Our work in service of underserved and underrepresented groups is a key aspect of our priorities. NEIWPCC understands that we are not achieving our mission and realizing our vision until all of our communities have access to clean and safe water.





## Wastewater Training

For more than 50 years, NEIWPCC has offered critical training for some of the nation's most essential workers. We offer basic, intermediate, and advanced courses to provide continuing education credits, or training contact hours (TCHs), to all levels of wastewater operators and to prepare them for certification exams.

Classes cover all aspects of the job, from wastewater treatment chemistry and microbiology, to equipment safety and lab procedures, to more specialized options on pertinent issues, like brewery treatment, cybersecurity, and environmental surveillance for COVID-19.

Our Lowell training team administers our regional and Massachusetts training programs, while our South Portland team runs the Maine Joint Environmental Training Coordinating Committee, which also trains drinking water professionals. We continued to offer almost exclusively remote, online courses in fiscal 2021, after converting our in-person training to a virtual format in 2020.

## Operator Certification

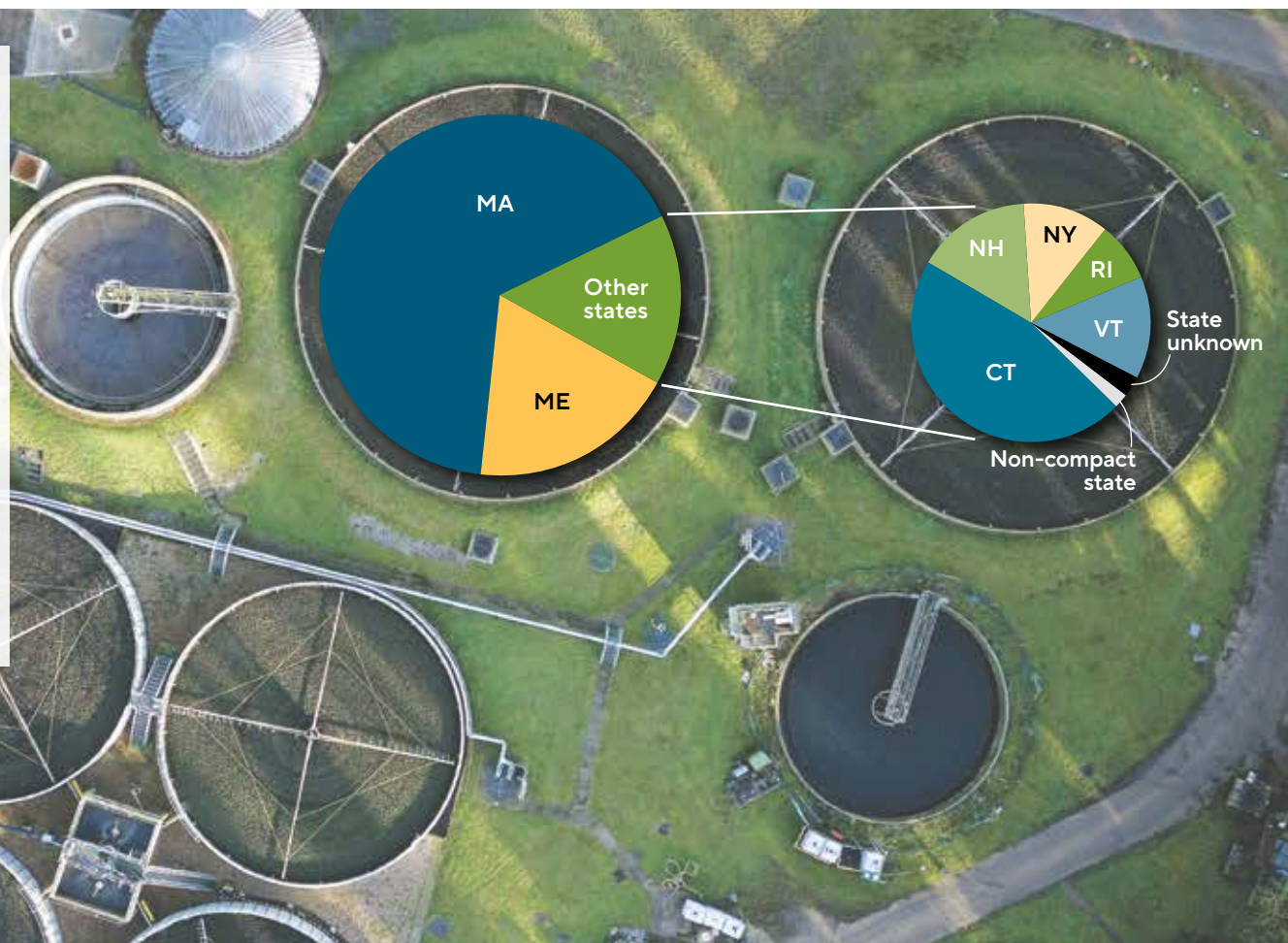
Our staff also administers the wastewater operator certification programs for Maine and Massachusetts in contract with those states' environmental protection departments. In 2021, NEIWPCC renewed certification for 632 operators, issued 239 new licenses, and granted eight state reciprocities in Massachusetts. In Maine, we renewed certification for 271 operators, issued 30 new certificates, and granted seven state reciprocities.

### Training Breakdown

Courses offered: 129  
Total Training Contact Hours (TCHs)  
Awarded: 8,161.75

### TCHs Awarded to Operators by State:

Massachusetts: 5,378.75  
Maine: 1,527.5  
Other states: 1,255.5  
Connecticut: 579  
New Hampshire: 195  
New York: 146  
Rhode Island: 100  
Vermont: 174  
State unknown: 36  
Non-compact state: 25.5





## CRITICAL OBJECTIVE: **FUNDING**

Build a sustainable funding model that allows us to continue to deliver on our mission while expanding the regional and national impact of our work.

- STRATEGIC GOALS:**
- Collaborate with member states to fund additional initiatives.
  - Build and strengthen partnerships to address the funding requirements associated with creating new/maintaining aging infrastructure.
  - Collaborate with state and federal partners to make efficient and effective use of available resources.

**In fiscal 2021, NEIWPCC executed 115 new agreements to fund research, monitoring, assessment, outreach and other environmental initiatives totaling nearly \$14.5 million.**

NEIWPCC administered 79 project contracts on behalf of the **Lake Champlain Basin Program**, amounting to more than \$2.7 million. One such project was a major dam removal in Bakersfield, Vermont that reconnected an estimated 23 miles of aquatic habitat in the basin for the first time since the 1800s.

NEIWPCC contracted leading experts in environmental economics to conduct an analysis of the economic benefits of having clean water in the **New York-New Jersey Harbor Estuary**. This study, estimated to be completed in 2023, will be the first of its kind in the region and could serve as a steppingstone for further work by governmental, non-governmental, and academic researchers.

In partnership with the **Hudson River Estuary Program**, NEIWPCC supported the development of two major handbooks for environmental managers in the Hudson River Estuary. One provides guidance for historic sites, land trusts, and owners of other large properties for creating and maintaining scenic vistas that balance aesthetic and historic goals with the protection of habitat and natural areas. The other provides guidance for climate change resiliency planning to reduce damage, costs, and other consequences associated with flooding in public access sites along the Hudson River.



*Dam demolition in Bakersfield, Vt.*

## Quality Assurance

NEIWPCC's Quality Management Program safeguards the scientific integrity of all the environmental data projects we support. Projects we administer that involve collecting or analyzing data for decision making must have an approved quality assurance project plan (QAPP), regardless of the funding source. QAPPs are completed according to the requirements set by the U.S. Environmental Protection Agency.

In fiscal 2021, our quality assurance team approved 37 QAPPs, including for:

- An economic analysis of the New York-New Jersey Harbor Estuary.
- A regional wastewater sludge generation estimate.
- An investigation of the effects of sea-level rise on coastal road flooding in Connecticut.
- The development of a management plan for a sub-watershed of Long Island Sound in Westchester County, New York.
- Eight community wastewater planning assistance projects in the East-of-Hudson watershed.
- Twenty-one projects with the Lake Champlain Basin Program, two with the Long Island Sound Study, one with the Hudson River Estuary Program, and one with the Peconic Estuary Partnership.

Additionally, this team carried out five quality assurance field

assessments during the fiscal year to ensure that all procedures outlined in a project's QAPP are followed. This year's assessments covered:

- A long-term water quality and biological monitoring project for Lake Champlain.
- Rapid detection of Atlantic salmon and trout in the Boquet and Ausable Rivers in New York using environmental DNA.
- Aquatic invasive species removal in Follensby Clear Pond, New York.
- A bioextraction study utilizing

seaweed aquaculture to improve water quality in the Long Island Sound.

- A geomorphic stream survey to document areas of concern to water quality in the town of Moriah, New York.





## Infrastructure

Maintaining the integrity of the Northeast's water infrastructure is one of NEIWPCC's five program priorities and a key component of our strategic plan. Through regional collaboration, training programs, and on-the-ground partnerships, we support critical infrastructure improvements for our member states.

### Partnerships with New York City

On behalf of the New York City Department of Environmental Protection (NYC DEP), NEIWPCC began administering a community wastewater management mini-grants program to improve water quality in the East-of-Hudson watershed. We worked with several municipalities on developing a total of eight wastewater management plans. NEIWPCC also has a contract

with the NYC DEP to administer the capital replacement and ongoing maintenance of wastewater treatment equipment in the New York City watershed.

### State Revolving Fund Webinars

The federal Clean Water and Drinking Water State Revolving Fund (SRF) programs are two central mechanisms for infrastructure improvement in the country. In the spring of 2021, NEIWPCC hosted a national webinar series for environmental professionals on utilizing SRF programs for nonpoint source pollution projects. The series included presentations from environmental managers with the U.S. Environmental Protection Agency and from California, Kansas, Maine, Minnesota, Vermont, and Washington State. In fiscal 2021, NEIWPCC also began planning a national SRF workshop for 2022.



New York City, New York



## FINANCIAL SUMMARY

The assets of NEIWPCC exceeded its liabilities at the close of the 2021 fiscal year by \$3,687,780. NEIWPCC's net operating gain of \$75,627 and investment income of \$70,385 helped to offset a loss on disposal of capitalized software in the amount of \$151,923. As a result, total net position decreased by \$5,911. NEIWPCC also supported the transition of the Peconic Estuary Partnership and the Narragansett Bay Estuary Program to local host organizations in fiscal 2021. Throughout these changes and amidst the ongoing pandemic, NEIWPCC has remained fiscally strong.

Lucia Walker, CPA  
NEIWPCC Comptroller

### Fiscal Year Ended September 30, 2021

#### Operating Revenues

Federal grants .....	\$7,765,238
State contracts .....	\$4,789,095
Other contracts.....	\$4,555,567
Donated services .....	\$632,694
Training.....	\$379,902
Member state support.....	\$164,172
MA and ME license renewal fees .....	\$106,795
MA and ME certification exam fees.....	\$20,050
Other income.....	\$15,790
Interest income.....	\$10,746

**Total Operating Revenue..... \$18,440,049**

**Operating Expenditures..... \$18,364,422**

Investment income .....	\$70,385
Loss on disposal of fixed assets .....	(\$151,923)

**Change in Net Assets .....** **(\$5,911)**

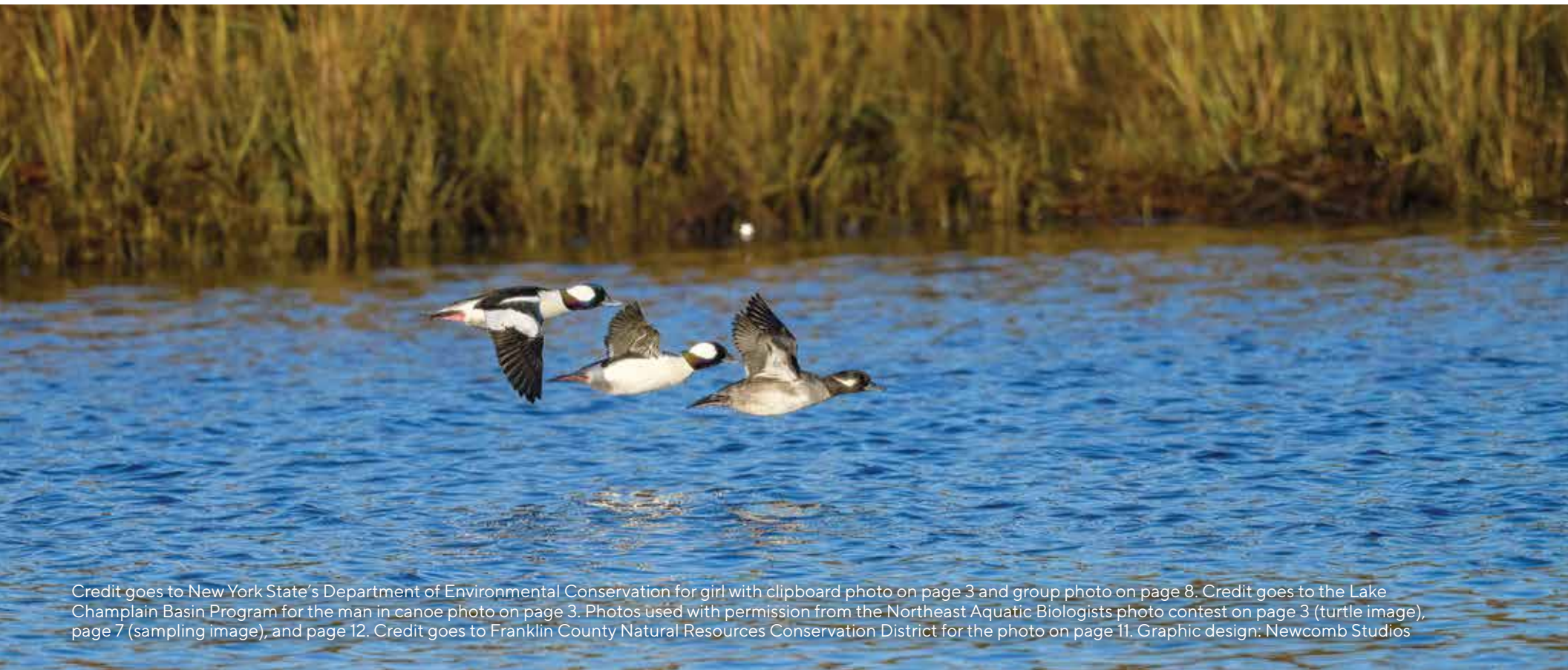






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