



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

April 30, 2014

The Honorable Russell Prescott, Chair  
Senate Energy and Natural Resources Committee  
Legislative Office Building, Room 101

**RE: HB 1383 relative to municipal monitoring of large groundwater withdrawals**

Dear Chairman Prescott and Members of the Committee:

Thank you for the opportunity to comment on House Bill 1383 which would (1) amend RSA 485:C-21, Approval for Large Groundwater Withdrawals, under which the Department of Environmental Services (DES) permits large groundwater withdrawals and (2) clarify the requirements associated with the installation and testing of backflow prevention devices on service connections of a public water system. DES supports HB 1383.

Sections 1 and 3 of HB 1383 would streamline the reporting requirements associated with water conservation standards established in Env-Wq 2101 for community water systems that demonstrate efficient use water. Env-Wq 2101 currently requires community water systems to submit water conservation plans. The proposed change would allow community water systems that demonstrate minimal water losses and accurate tracking of water use to forego the development of a water conservation plan.

Section 2 of HB 1383 would clarify DES authority to require the monitoring of impacts of large groundwater withdrawals on "seasonal river overflow surface water streams" by limiting the initial monitoring period that DES could require to a maximum of three years after initial operation. After three years, DES would then be required to conclude, with scientific justification, whether or not additional monitoring and analysis, or other adjustments to the large groundwater withdrawal permit conditions, would be necessary. HB 1383 would only reduce the initial monitoring period to three years for withdrawals that exist near one unique type of surface water, namely "seasonal river overflow surface water streams." This proposed change would probably only affect one of the thirty existing permitted large groundwater withdrawals. Modifications to monitoring requirements in permits are often made by DES at the time of permit renewal, which occurs every ten years for active withdrawals. However, large groundwater withdrawal permittees may also propose permit amendments for consideration by DES at any time, which DES then must consider based on well-defined criteria contained in our rules.

Section 4 of HB 1383 would stipulate when backflow prevention devices are required for connections to public water systems, the qualifications required for personnel installing backflow prevention devices and the testing requirements for these devices. Backflow prevention devices for drinking water supply service connections for water supply customers

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that use chemicals or pose other contamination risks are critical for the protection of public health. Section 4 of this bill would further clarify requirements to ensure that these devices are properly installed, tested and maintained by qualified individuals.

Thank you again for this opportunity to comment on this bill. Please feel free to call me at 271-2958, or Sarah Pillsbury at 271-1168, if you have any questions or need additional information.

Very truly yours,

A handwritten signature in black ink that reads "Thomas S. Burack". The signature is written in a cursive style with a large, stylized "B" at the end.

Thomas S. Burack  
Commissioner

cc: Representative Umberger  
Representative Carr  
Representative Chandler  
Representative Buco