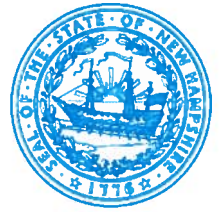




The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

January 23, 2018

The Honorable Richard Barry  
Chair, House Science, Technology and Energy Committee  
Legislative Office Building, Room 304  
Concord, NH 03301

**RE: HB 1227, An Act relative to an unattended idling vehicle on private property**

Dear Chair Barry and Members of the Committee:

Thank you for the opportunity to comment on HB 1227. This bill would amend RSA 265:72 to allow a person in charge of a vehicle to idle a vehicle unattended on his or her own property. The New Hampshire Department of Environmental Services (NHDES) has concerns with this bill.

HB 1227 would amend RSA Chapter 265 (Rules of the Road) Section 265:72 of Title XXI (Motor Vehicles) of the New Hampshire statutes dealing with requirements for unattended vehicles. The proposed legislation would add language to the statute to enable a person to idle a vehicle unattended on his or her own property.

NHDES currently receives regular complaints regarding motor vehicle idling, including a total of 33 complaints between 01/03/12 and 01/02/18. Many of these complaints involved idling at residential facilities or idling at commercial facilities where neighboring residential areas were impacted. Unnecessary vehicle idling contributes to air pollution-related health effects through the production of emissions of carbon dioxide, nitrogen oxides, carbon monoxide, particulate matter, and other harmful pollutants. In addition, diesel particulate matter is a known human carcinogen. Thus, vehicle idling, particularly large diesel vehicles on individual properties, may directly impact the health of neighborhood residents.

Vehicle idling is also inefficient because it burns fuel needlessly and results in unnecessary wear and tear on engines and associated maintenance costs. Reducing the idling time of vehicles saves fuel and money, protects public health and the environment, and increases energy security.

The New Hampshire Code of Administrative Rules Chapter Env-A 1100 currently establishes limitations for idling of motor vehicles. The addition of language pertaining to vehicle idling to RSA Chapter 265 Section 265:72 of Title XXI of the New Hampshire Statutes would create a blanket authority in the RSA's dealing with vehicle idling. As a result, this addition would interfere with the many complex issues regarding idling currently addressed in Chapter Env-A 1100. For this reason and for the potential health impacts, NHDES has concerns with HB 1227.

[www.des.nh.gov](http://www.des.nh.gov)

29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095  
(603) 271-3503 • Fax: 271-2867 TDD Access: Relay NH 1-800-735-2964

The Honorable Richard Barry  
Chair, House Science, Technology and Energy Committee  
January 23, 2018  
Page 2

Thank you again for the opportunity to comment on HB 1227. Should you have further questions or need additional information, please feel free to contact either Craig A. Wright, Director, Air Resources Division, ([Craig.Wright@des.nh.gov](mailto:Craig.Wright@des.nh.gov) , 271-1088) or Rebecca E. Ohler, Administrator, Technical Services Bureau, ([Rebecca.Ohler@des.nh.gov](mailto:Rebecca.Ohler@des.nh.gov) , 271-6749).

---

Sincerely,



Robert R. Scott  
Commissioner

cc: Sponsors of HB 1227: Representatives True, Itse