

Tourism, manufacturing, and Forest products are NH's top money making industries. They employ thousands of individuals and through their taxes they help fund NH's state and local government. New Hampshire is not a "home-rule state". In New Hampshire, municipalities can only exercise regulatory authorities the state has given them. Although Planning and Zoning regulations do apply to land development, subdivision, and land conversion, forestry is exempt. The Department's granting municipal conservation commissions the authority to review and inspect forestry wetland permits is a significant shift in the New Hampshire regulatory scheme and is counter to the intent of state law. In all the stakeholder meetings in which forestry representatives attended this was never discussed. Where did this come from, and why did NHDES staff feel it is needed?

There were many Stakeholder meetings held since 2014 that you have highlighted but when I go to DES's website I cannot find the minutes to these meeting. Can you provide the link to each meeting's minutes?

In the Governor's January 31st press release announcing the new rules, Commissioner Scott states, "By listening to our stakeholders on ways to improve the wetland rules, we can reduce many of the issues that arise during the permit process therefore making it more streamlined, predictable, and transparent for both the applicant and NHDES," For forest management permitting, the confusion these rules raise for landowners, loggers, and foresters defeats this purpose. Furthermore, the additional requirements and restrictions added by NHDES staff works counter to my ability to manage my property for forestry.

I do not believe that the proposed rules, in their current form have met this goal and I am recommending the Department start over and follow the format that the N.H. Legislature uses in the hearing process on new bills which is to; start with the existing law and strike out with a dashed line that which will be eliminated if the bill passes and add in italics the new language which will appear in the final version. From what I have been able to determine the proposed rules are much larger (Draft table of contents - 24 pages, Draft Rules - 236 pages) and more difficult to understand. In addition there are many sections of the rules where it is stated; "More stakeholder input needed" If more language has to be added to the rules, why didn't you hold the public hearings after the rules are complete or at least hold another set of draft public hearings after you have completed writing them.

Thank you for the opportunity for speaking on these proposed rules. I will be writing more comments before the comment period ends.

Tom Chrisenton