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CITY OF MANCHESTER

Department of Public Works

April 19, 2018

Mary Ann Tilton
State of New Hampshire
Department of Environmental Services
29 Hazen Drive
Concord, NH 03302

Dear Ms. Tilton:

Thank you for the opportunity to comment on the draft Wetlands Administrative Rules. We recognize that this is an enormous undertaking by the Department of Environmental Services (DES) and appreciate the difficulty of the task before you.

In the DES presentations available online, there is a lot to like about the conceptual framework in place for development of the revised rules. We agree with your stated goals:

- Enhance predictability and transparency
- Increase consistency and standardization
- Ensure scientifically-based decisions that are protective of New Hampshire's important natural resources
- Strike the right balance between protecting natural resources and supporting economic activity

By nature, regulations often require multiple cross-references and language ambiguous enough to address a wide variety of scenarios. This appears to be the case with the proposed rules. Unfortunately, this leaves the regulated community with a level of uncertainty that is difficult to plan around.

Guidance documents written in plain English that provide clear direction to proponents of common projects are invaluable. In practice, these will be the resources that are referenced by folks "on the ground", not the rules themselves. DES appears to have made great strides in this regard by simultaneously producing a number of draft Best Management Practice (BMP) documents pertaining to practical interpretation of the wetlands rules.

We strongly encourage DES to:

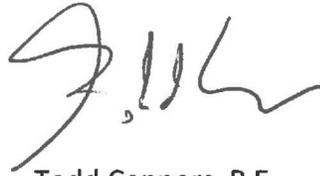
- Provide stakeholders the opportunity to continue to concurrently provide input on the draft BMP documents, *and to have this input inform additional amendments to the draft rules themselves*
- Consider producing additional BMP/guidance documents pertaining to projects not currently covered by the existing draft BMPs and identified by stakeholders in Focus Input Sessions as important to their work

City of Manchester staff look forward to participating in the Focus Input Sessions you have planned.
Thank you.

Sincerely,



Mark Gomez
Environmental Programs Manager
City of Manchester
Department of Public Works



Todd Connors, P.E.
Engineering Manager
City of Manchester
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