

Wetland Rule Change Comments from the Jefferson Conservation Commission  
17 January 2019

To: Mary Ann Tilton

Thank you for the opportunity to comment on the proposed wetland rule changes that DES and others have been working on. The Jefferson Conservation Commission in Coos County has reviewed the proposed changes, attended public hearings and reviewed comments from other organizations.

These are the major points of concern along with our suggested changes.

1. Lack of local Conservation Commission (CC) involvement. Our CC feels that the proposed new rules eliminates local review. We feel that local CC's should be informed of all actions where permits are required. Keep CC's involved.
2. Time frame is too short for adequate review. Five days is way too short especially if the request came in on a holiday weekend. Make it 10 business days for LSA approval.
3. Permit timeframes are too short for adequate review. Adequate review cannot be done in the drastically reduced times in the proposed changes. Haste makes waste is the old adage. The permit by notification changes really weaken wetland protection. We can see people and businesses deciding that they will see everything as a permit by notification. Keep it the way it is now.
4. We do not understand how the pre-application process would work.
5. Definitions and abbreviations were not clearly explained.
6. Funding for DES staff and inspections is already lacking and these proposals would amplify this negative situation. We want to see a discussion of how the DES wetlands bureau would be staffed and funded at adequate levels.
7. Most, if not all, conservation commissions are staffed by volunteers. We get the impression that these changes were largely written by the paid construction industry representatives with help from ALEC or equivalent.

In closing, the Jefferson Conservation Commission feels that the proposed changes cut out local review and are rushed through without adequate safeguards. We would like to see DES review all the comments and reach out to the public again with additional review. There is no reason to rush to get these changes made.

/s/ David Govatski  
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