

Ashuelot River Local Advisory Committee

Washington Lempster Marlow Gilsum Sullivan Surry Keene Swanzey Winchester Hinsdale

Jan. 18, 2019

Ms. Mary Ann Tilton
NHDES Wetlands
PO Box 95
Concord, NH 03302-0095

RE: Proposed Wetlands Rules

Dear Ms. Tilton:

The Ashuelot River LAC has attempted to follow and understand the proposed changes to the NH Wetland Rules and may not fully understand all the implications of the proposed rules. However, it appears that notification of the local Conservation Commissions, LAC's where applicable, and abutters is being eliminated in all but the standard permit application for major wetland projects.

Many wetland activities will now be categorized as lower scrutiny and require either registration or that a PBN be filed by the applicant. It will be difficult for a Conservation Commission, LAC or abutter to know if observed wetland activity is legally being undertaken if we do not receive notice. Also smaller wetland projects can have a cumulative impact over time and this impact might be missed and underappreciated without local notification. The ability of LAC's to provide comprehensive feedback on major projects within the river corridor will be minimized as we may not be fully aware of the cumulative effects of these smaller projects in the corridor.

Having to check the NHDES website for a filing places the onus on those who are most affected, is inefficient, and can be easily remedied by a simple notification of the filing by the applicant. Simply a name, map and lot number, and brief description of the project would go a long way to help those who have oversight of wetland activity in their towns/river corridor.

The proposed system may improve the streamlining for NHDES and the applicant, but places an undue burden on those adjacent to the project and to those entrusted with local protection of wetlands.

Respectfully submitted,



Barbara Skuly
Chairman

Cc: T. Sales, NHRMPP