



**Land Use Department  
Town of Barrington  
P.O. Box 660; 333 Calef Hwy  
Barrington, NH 03825**

Mary Ann Tilton  
Assistant Bureau Administrator  
Wetlands Bureau  
Land Resources Management Program  
NH Department of Environmental Services  
29 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095

January 18, 2019

Dear Mary Ann

At its December and January meeting the Barrington Conservation Commission took some time to review the draft of the proposed new wetlands rules for the state. We would like to comment on a few of the proposed changes. I also attended the NHDES Conservation Commission Focus Input Session about the proposed changes last week.

First, we support the addition of “scrub-shrub wetland adjacent to a waterbody” to the list of proposed impacts that will require at least a minor impact application. Clearly this type of wetland generally has many important functions and values that merit increased oversight.

We also approve the streamlining of projects involving bioengineering, wildlife pond construction, and restoration projects, as these should be made to be achievable with as little ‘red tape’ as can realistically be allowed.

Of greatest concern to us, however, is that we do *not* support the proposal to completely remove conservation commission review for Permits by Notification, nor to reduce their turnaround time from ten to five days. We appreciate, in some cases from personal experience, the difficulties that can be encountered in the existing, somewhat convoluted process of what should be a fairly simple application process, and much of what is proposed makes good sense. Nonetheless, we believe that an applicant who knows that there will be no local review of a project is much more likely to try to “get away with things” than someone who simply sends an application off to a far-away reviewer in Concord. If better than 99% of these applications get approved under the present rules, it may well be because an applicant knows that there will be local scrutiny.

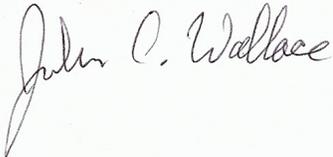
A possible way to simplify the process for the bureau would be to have conservation commissions review a proposal in the form of a preapplication. Once an application has been approved by the commission it can be sent on to DES with that approval noted. If an applicant chooses not to go through with the preapplication process, a proposal can be submitted directly to DES, which will then

be given sufficient time (perhaps 30 days) to review that project. One would imagine that most applicants will choose the preapplication pathway.

Finally, we do not support including projects involving access to residential or commercial projects in the Permit by Notification process. Without a more stringent review process, we believe that many of applicants will get away with taking 'short-cuts' that may result in undue damage to wetlands and other natural resources.

We appreciate the opportunity to comment on the proposed changes. If you have any questions or concerns feel free to contact me via the town hall offices at 664-5798, or via email at [crawford@myfairpoint.net](mailto:crawford@myfairpoint.net)

Sincerely,

A handwritten signature in cursive script that reads "John O. Wallace". The signature is written in black ink on a light-colored, slightly textured background.

John Wallace  
Barrington Conservation Commission