

Mary Ann Tilton  
Wetlands Bureau  
NHDES  
29 Hazen Drive  
Concord, NH 03302

January 18, 2019

Dear Mary Ann:

These are the Gilmanton Conservation Commission Comments on Proposed DES Wetlands rules changes. Please note our full support for the NHACC comments submitted by Barbara Richter.

1. RSA 36-A:2 provides that:” conservation commissions are responsible for the proper utilization and protection of the natural resources and for the protection of watershed resources of said city or town. Such commission shall conduct researches into its local land and water areas and shall seek to coordinate the activities of unofficial bodies organized for similar purposes.... It shall keep an index of all open space and natural, aesthetic or ecological areas within the city or town, as the case may be, with the plan of obtaining information pertinent to proper utilization of such areas, including lands owned by the state or lands owned by a town or city. It shall keep an index of all marshlands, swamps and all other wet lands in a like manner, and may recommend to the city council or selectmen or to the department of natural and cultural resources a program for the protection, development or better utilization of all such areas.” In fulfilling this role, our conservation commission has always worked closely with the Wetlands Bureau through our oversight role to assure the proper protection of our wetlands, waters and natural resources. The proposed rules would significantly reduce our commission's ability to provide or that thorough and proper use and protection of those resources, which is the key to our role in this process.

2. Lack of staff is not a reason to essentially surrender to proposals to put more wetlands at risk, especially when the state will be increasing fees it could use to hire additional staff needed to address the number of wetlands permits applied for.

3. Conservation commissions provide a vital function to inspect wetlands sites, whether for permitting purposes or to investigate potential violations, that Wetlands staff are not able to address. It is not an answer to simply add more projects to classifications that do not require conservation commission oversight; that proposal simply gives away even more wetlands than are presently lost.

We appreciate the opportunity to provide these comments, and look forward to working to strengthen the proposed rules.

Sincerely,

Dick de Seve  
Chair, Gilmanton Conservation Commission