

Starrett Farm

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18 January 2019

Mary Ann Tilton, Assistant Administrator
NHDES Wetlands Bureau
29 Hazen Drive
Concord, NH 03301

re: 2019 Proposed Wetlands Rules

Dear Ms Tilton:

There is much to appreciate in the proposed rules including: the general intent to simplify and expedite permit procedures; specific sections for Forestry and Agriculture (proposed 520 and 522); the expansion and expedited timelines of the PBN and SPN permits; and the reorganization of the major sections with a separate section for Project Specific Requirements (proposed 500).

I do worry that some of the requirements for agricultural permits will be burdensome or too expensive for practical use. The option of using a private consultant is well-intended and of value; NRCS staff are frequently overbooked or otherwise unavailable to us. An option to conduct some projects without professional consultants would be welcome.

Much of the old Best Management Practices for Agriculture (BMWPs, 1993, '98) were obviously taken from SCS/NRCS documents, but they seemed to offer general guidance and suggestions for work in jurisdictional areas. The new BMWPs (2018) seem to have lost the helpful guidance in favor of what shall be done and much of the document reads more like regulation than helpful suggestion, yet, to my knowledge, their approval is not a part of the regulatory process.

I hope that going forward the Bureau will continue to work with NH Farm Bureau and NH Timberland Owners to make common sense changes to the permitting process. Thank you for the opportunity to comment on the proposed rules.

Sincerely,

Henry Kunhardt
Starrett Farm