



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



January 25, 2022

The Honorable Howard Pearl
Chairman, Environment and Agriculture Committee
Legislative Office Building, Room 303
Concord, NH 03301

RE: HB 1517-FN – AN ACT creating a pollinator solar scorecard

Dear Chairman Pearl and Members of the Committee:

Thank you for the opportunity to testify on HB 1517. This bill would allow for the New Hampshire Department of Environmental Services (NHDES) to establish a native vegetation habitat and pollinator management plan for owners of ground-mounted, commercial solar-energy sites. NHDES does not support this bill because it duplicates an existing program and could interfere with stormwater management on these sites.

The objective of the bill is to allow NHDES to issue certificates of compliance to solar sites meeting the guidelines of a pollinator management plan. A new program is not needed; however, because UNH Cooperative Extension already offers this recognition through the Pollinator Garden Certification Program. This program is oriented toward backyard gardens but could provide certification for commercial sites also. A second certification program would be redundant and potentially confusing.

NHDES' primary role in permitting solar sites is to prevent erosion and attenuate stormwater runoff to nearby lakes, streams, and wetlands. To successfully establish native vegetation meadow areas, all existing vegetation needs to be removed and the existing weed seed bank may need to be controlled by covering the area with plastic for a season. If implemented on a large solar site, this practice would actually increase soil erosion and runoff, which would be out of compliance with NHDES primary permitting requirements.

Thank you again for the opportunity to comment on HB 1517. Should you have questions or need additional information, please feel free to contact either Ridgely Mauck, Alteration of Terrain Administrator (addison.r.mauck@des.nh.gov, 271-2303) or Philip Trowbridge, Land Resources Management Administrator (philip.r.trowbridge@des.nh.gov, 271-4898)

Sincerely,

Robert R. Scott
Commissioner

cc: Sponsors of HB 1517: Representatives Hakken-Phillips and McWilliams