



The State of New Hampshire  
**Department of Environmental Services**

**Robert R. Scott, Commissioner**



February 24, 2021

The Honorable Andrew Renzullo  
Chairman, House Resources, Recreation and Development Committee  
Legislative Office Building, Room 305  
Concord, NH 03301

RE: HB 397 – An Act relative to permitting fees under the shoreland protection act

Dear Chairman Renzullo and Members of the Committee:

Thank you for the opportunity to comment on HB 397. This bill proposes to exempt municipal, county, state, or federal entities as well as legally recognized non-profit organizations from the application filing fees required when applying for permits required under the Shoreland Water Quality Protection Act, RSA 483-B. The New Hampshire Department of Environmental Services (NHDES) does not support this bill.

The Shoreland Program at NHDES handles over 600 applications, 600 Permit by Notifications, and 80 compliance investigations per year. Processing these applications and associated field work requires significant staff time and effort with the goal to balance development with the protection of water quality in our lakes, rivers, and tidal waters. Applications from government entities and non-profit organizations require no less effort than those for private development. They still consume significant program resources and, therefore, should not be exempt from supporting this fee-for-service program.

Thank you again for the opportunity to comment on this legislation. Should you have questions, or need additional information, please feel free to contact either Darlene Forst, Shoreland Section Supervisor, at 603-271-4067 or [Darlene.c.forst@des.nh.gov](mailto:Darlene.c.forst@des.nh.gov) or Rene Pelletier, Assistant Director, Water Division at 603-271-2951 or [Rene.j.pelletier@des.nh.gov](mailto:Rene.j.pelletier@des.nh.gov).

Sincerely,

Robert R. Scott  
Commissioner

cc: Sponsors of HB 397: Representatives Pearl, Lang, Baldasaro, and Senators French, Gannon