



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



**Robert R. Scott, Commissioner**

January 30, 2023

The Honorable Denise Ricciardi  
Chair, Senate Transportation Committee  
Legislative Office Building  
Concord, NH 03301

**Re: SB 186-FN, An Act** relative to an electric bicycle low-income transportation incentive program and making an appropriation therefor.

Dear Chair Ricciardi and Members of the Committee:

Thank you for the opportunity to comment on behalf of the New Hampshire Department of Environmental Services (NHDES) regarding SB 186-FN, which seeks to create an electric bicycle incentive and rebate program and fund for low-income workers and makes an appropriation to the fund. Motor vehicles account for over half of the air pollution that causes the formation of ground level ozone, a respiratory irritant, and contributes significantly to greenhouse gas emissions. NHDES supports the use of non-combustion modes of transportation, including electric bicycles, where feasible, to reduce these emissions. However, NHDES has concerns with the bill as written.

NHDES' concerns with SB 186-FN have to do with the proposal to have NHDES house and manage a program to distribute rebates for electric bicycles and eligible accessories to income-eligible residents. In its Fiscal Note, NHDES highlighted several issues and offers that NHDES is not set up for, nor appropriately staffed, to house such a program. The following barriers are noted:

- The bill identified a specific position within NHDES' Air Resources Division to oversee and manage the program. This position is funded through a federal grant which has specific tasks associated with the funding. Promoting or enabling adoption of electric bikes are not among the tasks that qualify for this funding. The tasks identified for NHDES, including verifying residency, are outside the scope of anything the department currently does; therefore, NHDES would need to add a position to undertake this program.
- The program is proposed as a rebate program and would require NHDES to verify the income eligibility of the applicants. NHDES is not set up to make such a verification. NHDES is not able to speak to whether there is a program as named in the bill that is

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29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095  
(603) 271-3503 • Fax: 271-2867 TDD Access: Relay NH 1-800-735-2964

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able to undertake this verification. It would be necessary for NHDES to contract with an appropriate entity to do this this task.

- NHDES is not equipped to implement a mechanism to ensure a recipient of a rebate retains the electric bike for the intended use and is also concerned about the need to enter into legal agreements with minors.
- The bill allocates \$100,000 to the Department of Health and Human Services for this program. NHDES assumes this is an error and such allocation should be to NHDES. However, as detailed in the Fiscal Note, NHDES costs to establish and run such a program would be more than this allocation.

Thank you again for the opportunity to comment on SB 186-FN. Should you have further questions or need additional information, please feel free to contact me or Rebecca Ohler, Administrator, Technical Services Bureau, Air Resources Division (603-271-6749, [rebecca.ohler@des.nh.gov](mailto:rebecca.ohler@des.nh.gov)).

Sincerely,



Robert R. Scott  
Commissioner

ec: Sponsors of SB 186-FN: Senators Watters, Prentiss, Perkins Kwoka, Soucy and Fenton;  
Representatives Sykes and Tellez