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Markets & Food

John Magee
NH Fish & Game
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NH Department of
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Staff:

Tracie Sales
Program Manager

Jen Drociak
Watershed Coordinator

Mariah Mitchell
Program Assistant

N.H. Rivers Management and Protection Program

N.H. Rivers Management Advisory Committee

January 21, 2020

The Martha Fuller Clark, Chair
Senate Energy and Natural Resources Committee
Senate House, Room 103
Concord, NH 03301

RE: SB 627 *establishing a dock registration procedure.*

Dear Chair Fuller Clark and Members of the Committee:

The Rivers Management Advisory Committee (RMAC) appreciates the opportunity to comment on Senate Bill 627 which establishes a dock registration procedure. The RMAC is concerned that this would allow existing docks that do not meet current permitting standards for new docks legal, resulting in unsafe conditions in rivers.

The RMAC does not object to the concept of a dock registration, but feels that the language of the bill codifies existing docks that may not have been constructed in accordance with state statute and rules and therefore may also not have obtained proper authorization or a permit. The RMAC does not believe the state should provide a universal blessing to those potentially illegal structures which may not meet size or location requirements. This is especially concerning for docks in rivers, where the increasing severity and frequency of storms results in high flows that place significant stress on dock infrastructure, which could pose a hazard to those downstream. In addition, allowing any illegally-constructed docks, at a maximum of 6 ft. wide by 30 ft. long and parallel to potentially both sides of a river, may collectively act as hard-armor along the shoreline by hampering flows and deflecting energy, which can cause erosion and damage to other property above, below, and across from these structures. Additionally, these structures can cause changes to river flow and bottom such as channelization, where waters can become unnaturally deep and swift around these docks and wharves. Instead, the RMAC recommends only registering docks that meet current permitting criteria set forth in statute and rule.

The RMAC is a legislatively created body charged to work with the New Hampshire Department of Environmental Services (NHDES) to administer RSA 483, the Rivers Management and Protection Program. The Governor and Council appointed Committee is comprised of members from business, agriculture, hydroelectric, municipal government, water supply, conservation, recreation, fish and game, and historical interests. Among its other responsibilities, the RMAC is charged with reviewing legislation relevant to the Program and with advising the NHDES Commissioner on the merits of such legislation.

Thank you for the opportunity to comment on SB 627. Should you have any questions regarding our testimony, please contact me at 603.796.2615 or MLT@naturesource.net.

Sincerely,



Michele L. Tremblay
RMAC Chair

cc: Sen. Cindy Rosenwald
Sen. Jeb Bradley
Sen. David Watters
Sen. Bob Giuda
Sen. Dan Feltes
Rep. Suzanne Smith
Rep. Judith Spang
Rep. Andrew Renzullo
RMAC Representatives
Robert R. Scott, Commissioner, NHDES
Tom O'Donovan, Director, Water Division, NHDES
Ted Diers, Administrator, Watershed Mgmt. Bur., NHDES
Tracie Sales, Rivers and Lakes Programs Manager, NHDES
Local River Management Advisory Committee Chairs