

New Hampshire Association of Natural Resource Scientists
*Post Office Box 110 * Concord, NH 03302-0110*



February 27, 2023

Carol McGuire, Chair
House Executive Departments and Administration (ED&A) Committee
NH State House
107 North Main Street
Concord, NH 03301

Re: House Bill 655, Sections 90 & 91

Dear Members of the House Executive Departments and Administration (ED&A) Committee:

The NH Association of Natural Resource Scientists (NHANRS) is a state-wide non-profit professional organization whose membership includes wetland scientists, soil scientists and wildlife biologists from the professional consulting community and from the state's academic and public sectors.

Our Legislative Committee has considered HB 655, specifically as it pertains to the Board of Natural Scientists (Sections 90 and 91). As we read this bill, it repeals functions of the Board of Natural Scientists and leaves the wetland and soil scientist certifications intact. We can support reorganization that will make the certification process simpler and easier to maintain, including merging with another Board or changing to an Advisory Board, given the limited number of complaints filed in our professions.

Additionally, we offer the following:

- Today, there are over 180 practicing New Hampshire Certified Wetland Scientists, as well as many who are currently working with these professionals in practice to become certified. NH Certified Wetland and Soil Scientists serve as liaisons between developers and local, state, and federal government officials, facilitating the permitting processes with these entities.
- NH Certified Wetland (CWS) and Soil Scientists (CSS) assist local, state, and federal agencies in balancing wise growth and development, environmental protection, and the rights of private property owners. CWS's and CSS's assist these entities by providing technical expertise, which is founded in scientific principles. This technical expertise not only includes determining the boundary between developable and undevelopable lands, it also includes assessing wetlands to determine their overall functions and values. It is through these wetland assessments that growth and environmental protection are balanced.
- Local, state, and federal agencies depend on CWS and CSS expertise and knowledge of the sciences to assist them in making objective, scientifically-based planning and permitting decisions. Countless municipal ordinances require coordination with NH Certified Wetland and Soil Scientists.

- In 2018, in a formal press release, the Governor praised the new DES Wetlands Bureau Administrative Rules. NH Certified Wetland Scientists were instrumental in the development of these rules.
- The 2019 Audit Report of the DES Wetlands Bureau stressed the importance of DES Wetlands Bureau staff holding professional credentials (i.e., CWS) and raised concerns about having uncredentialed employees performing the duties of certified professionals.
- According to the Board of Natural Scientists, they receive approximately two to three complaints per year regarding the conduct of NH Certified Wetland and Soil Scientists. This low number is the result of adequate training and field experience for CWS/CSS to perform effectively, as well as a strong code of ethics, due to continuing education requirements.
- NH Certified Wetland Scientists undergo extensive field training with real time experience in identifying wetlands in some of the most diverse and difficult wetlands within New England.
- NH Certified Wetland Scientists are integral in maintaining New Hampshire's unique relationship with U.S. Army Corps of Engineers and the Programmatic General Permit process. Without this relationship, greater oversight would be required from federal agencies with much longer permitting times and higher costs to developers and private landowners.

We appreciate the opportunity to submit these comments and we are available for any additional questions or comments. Please contact me at (603) 716-3343 if you would like to discuss further.

Sincerely,

A handwritten signature in cursive script that reads "Kimberly Peace". The signature is written in black ink and is positioned below the word "Sincerely,".

Kimberly R. Peace
NHANRS Legislative Committee