

Voting Members:

David Packard
Chair
NH Lakes Assn.

Shane Bradt
Scientific Community

Ryan Cardella
Marine Trades
Association

Tiffany Grade
Conservation
Community

Sara Holland
NH Association of
Realtors

Janet Kidder
Planning Boards

Frank Lemay
NH BIA

Jared Maraio
NH Travel Council

Lisa Morin
State Conservation
Committee

Dick Smith
Fishing Interests

Meredith Smith
Municipal Official

Bruce Temple
NH Fish & Game
Commission

Vacant
Conservation
Commissions

Non-Voting Members:

Garret Graaskamp
Vice Chair
NH Fish & Game Dept.

Capt. Tim Dunleavy
NH Dept. of Safety

Eric Feldbaum
NH Dept. of Natural and
Cultural Resources

Jennifer Gilbert
NH Office of Strategic
Initiatives

Mark Hemmerlein
NH Dept. of Trans.

Shawn Jasper
NH Dept. of
Ag, Markets & Food

Staff:

Tracie Sales
Program Manager

Nisa Marks
Program Assistant

Vacant
Watershed Coordinator

N.H. Lakes Management and Protection Program
N.H. Lakes Management Advisory Committee

January 26, 2022

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

RE: HB 1440 - AN ACT relative to surface water quality standards for perfluorinated chemicals.

Dear Chair Renzullo and Members of the Committee:

RSA 483-A established the New Hampshire Lakes Management and Protection Program and the Lakes Management Advisory Committee (LMAC) to complement and reinforce existing state and federal water quality laws. Within its responsibilities of advising the NHDES Commissioner and the department, the LMAC reviews and takes positions on legislation pertaining to New Hampshire's lakes. The LMAC appreciates the opportunity to comment on House Bill 1440.

The LMAC opposes HB 1440. Work is already underway by NHDES to set PFAS standards for surface waters, so requiring the first rulemaking task in this bill is unnecessary. The second rulemaking task is impractical because there are not adequate data at this point to accomplish it. We strongly believe that safe water quality standards must be based on scientific information. At present, we are not aware of sufficient science to translate the amount of PFAS present in the water column into the amount present in fish or shellfish from that water. Therefore, safe limits for human consumption are impossible to establish regardless of a mandate to do so.

The LMAC is a legislatively created body of lake stakeholders, representing the NH Lakes Association, conservation commissions, the scientific community, conservation community, planning boards, Business and Industry Association, tourism industry, state conservation committee, NH Municipal Association, fishing interests, NH Fish & Game Commission, NH Association of Realtors, Marine Trades Association, and several state agencies. Committee members are appointed by the Governor and Council or the head of the state agency and are charged with supporting the legislative intent of the Lakes Management and Protection Program.

In conclusion, the LMAC opposes HB 1440 for the reasons stated above. Thank you for the opportunity to comment. Should you have questions, please feel free to contact me at (603) 867-9299 or appliedforce52@gmail.com.

Respectfully,



David Packard, Chair

ec: Rep.s Cushing, Grassie, Rung, Bouldin, Meuse, Tucker, and Paige
LMAC Representatives
Robert R. Scott, Commissioner, NHDES
Ted Diers, Administrator, Watershed Mgmt. Bur., NHDES
Tracie Sales, Rivers and Lakes Programs Manager, NHDES