

# Memo



TO: Conservation Commission Members  
FROM: Kate Homet, Environmental Planner/Sustainability  
Coordinator; Peter Britz, Director of Planning &  
Sustainability  
DATE: January 9, 2026  
SUBJ: January 14, 2026 Conservation Commission Meeting

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**50 Clough Drive  
City of Portsmouth, Owner  
Assessor's Map 206 Lot 20**

This application is for an upgrade to the Portsmouth Little Harbor Elementary School playgrounds to create compliance with universally accessible (UA) standards while incorporating nature-based play. The current impervious surfaces within the 100' wetland buffer on this lot includes approximately 22,252 s.f. of impact. To renovate and reconstruct the two playground areas at the school, this project proposes a temporary impact of 9,889 s.f. to the wetland buffer area with total proposed final permanent impact of 16,927 s.f. to the wetland buffer area for soil disturbance, asphalt work, landscaping, installation of an ADA-compliant surface, installation of new structures and grading work. This project is proposing landscaping enhancements including 11 new trees, 46 planted shrubs and herbaceous native plant species and 34 herbaceous species within a newly constructed rain garden. This project occurs within the wetland buffer of a prime tidal wetland.

*1. The land is reasonably suited to the use activity or alteration.*

This lot is already a developed lot with existing playgrounds on site within the wetland buffer. This project proposes a decrease in impervious surfaces within the wetland buffer and is moving the main playground area further from the resource than the current structure.

*2. There is no alternative location outside the wetland buffer that is feasible and reasonable for the proposed use, activity or alteration.*

This project is within a previously developed buffer where playgrounds currently exist. This project proposes pulling some of the existing impacted areas further from the salt marsh and reducing the overall impervious area.

*3. There will be no adverse impact on the wetland functional values of the site or surrounding properties.*

The proposed work should reduce impervious surface within the buffer, pull impacts further from the resource, introduce new native vegetation and start to treat existing stormwater. This project appears to reduce existing adverse impacts to the resource and buffer.

4. *Alteration of the natural vegetative state or managed woodland will occur only to the extent necessary to achieve construction goals.*

This project proposes a large addition of new vegetation and planted trees which will increase the existing vegetation within the buffer.

5. *The proposal is the alternative with the least adverse impact to areas and environments under the jurisdiction of this section.*

This project proposes a reduction in impacts overall to the buffer and in some areas, pulls impacts further from the salt marsh. This appears to be a less impactful alternative to the current playground structures and includes new plantings and stormwater treatment where none exist today.

6. *Any area within the vegetated buffer strip will be returned to a natural state to the extent feasible.*

It appears as though the vegetated buffer strip is only being disturbed within the main playground project for loaming and seeding. Additional plantings are encouraged in this area of the buffer to ensure protection of the adjacent resource.

**Recommendation:** Staff recommends **approval** of this application to the Planning Board with the following condition:

1. In accordance with Section 10.1018.40 of the Zoning Ordinance, applicant shall permanently install wetland boundary markers, which may be purchased through the City of Portsmouth Planning & Sustainability Department. It is recommended that markers be placed along the 25' vegetative buffer at 50-foot intervals.

**333 Borthwick Avenue  
HCA Health Services of New Hampshire, Owner  
Assessor's Map 240 Lot 2-1**

This application is for the replacement of an ambulance garage door and the addition of a widened concrete sidewalk with a new overhead canopy at the Portsmouth Regional Hospital ambulance bay. A portion of this project lies within the 100' wetland buffer. The proposed impacts include approximately 730 s.f. of new impervious surfaces added to expand the sidewalk width.

1. *The land is reasonably suited to the use activity or alteration.*

This lot is a previously disturbed lot with mostly impervious surfaces for transportation and pedestrian access to the hospital. This project is a safety improvement for patients of the hospital and would create a small increase in impervious surface where landscaping exists today.

2. *There is no alternative location outside the wetland buffer that is feasible and reasonable for the proposed use, activity or alteration.*

The location of proposed work is within the existing ambulance bay. There is no alternative location outside of the wetland buffer.

3. *There will be no adverse impact on the wetland functional values of the site or surrounding properties.*

This project proposed an increase in impervious surfaces while also adding new downspouts to proposed canopy to capture additional stormwater runoff. In addition, applicant needs to demonstrate enhancements to offset the impacts of increased impervious surfaces.

4. *Alteration of the natural vegetative state or managed woodland will occur only to the extent necessary to achieve construction goals.*

It appears as though the expansion of impervious surfaces is proposed to occur within the existing landscaped area. This area does not show existing plantings to be removed.

5. *The proposal is the alternative with the least adverse impact to areas and environments under the jurisdiction of this section.*

This proposal creates an adverse impact by increasing impervious surfaces within the wetland buffer. For alternatives, the applicant should consider permeable surfaces within the wetland buffer and additional plantings along the resource to attempt to offset the proposed impacts.

6. *Any area within the vegetated buffer strip will be returned to a natural state to the extent feasible.*

It appears as though the vegetated buffer strip is not being impacted as part of this project. Applicant should consider plantings within this area of the buffer to protect the wetland resource.

**Recommendation:** Staff recommends **approval** of this application to the Planning Board with the following conditions:

1. According to Section 10.1017.24 of the City of Portsmouth Zoning Ordinance, a wetland buffer enhancement plan is required when the applicant does not demonstrate a net zero impact to impervious surfaces. According to 10.1017.4 (1) *'The wetland buffer enhancement plan shall include a combination*

*new plantings, invasive species removal, habitat creation areas, improved site hydrology or protective easements provided offsite’.*

2. According Section 10.1018.31, ‘*All new pavement installed in a wetland buffer shall be porous pavement.*’ Applicant shall provide a plan showing all new pavement to be porous.
3. Applicant shall consider installing new plantings along the bank of the resource or in an alternate location on the site to help mitigate impacts from new impervious surfaces.
4. Applicant should provide information on how roof canopy runoff will exit downspout and enter the catchbasin.