The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner

November 10, 2026

PAUL DOISNEAU 2021 REVOCABLE TRUST
PO BOX 571
NEEDHAM MA 02494

Re: Request for More Information – Standard Dredge and Fill Wetlands Permit Application (RSA 482-A)
NHDES File Number: 2026-02527
Subject Property: 4 Robin Lane, Portsmouth, Tax Map #207, Lot #10

Dear Applicant:

On November 9, 2026, the New Hampshire Department of Environmental Services (NHDES) Wetlands Bureau reviewed the above-referenced Standard Dredge and Fill Wetlands Permit Application (Application). Pursuant to RSA 482-A:3, XIV(a)(2) and Rules Env-Wt 100 through 900, NHDES Wetlands Bureau determined the following additional information is required to complete its evaluation of the Application:

1. On October 19, 2026, NHDES received correspondence from the Portsmouth Conservation Commission (PCC) recommending denial of this project that includes comments of concern regarding this application (enclosed). In accordance with Env-Wt 311.06(h), please address all comments of concern received from the PCC as a part of the response to this letter.
2. The Application omitted both the phone number and email address for the Applicant. This information is required pursuant to Env-Wt 311.04(a).
3. Revise the plans prepared by TF Moran, Inc. (TFM Plans) to include the landward boundary of the navigational channel on plan sheet C-02, titled "proposed conditions plan," per Env-Wt 606.04(a)(1) and plan sheet C-03, titled "pier profile", per Env-Wt 606.04(b)(2).
4. The highest observable tide line (HOTL) observed on March 12, 2026, as depicted on the TFM Plans supplied with the Application is not accurate. Review of local tide charts indicates a higher tide fluctuation in the area than the date the HOTL was observed. Revise the TFM Plans to depict the following in accordance with Env-Wt 603.08 (a)(6), pursuant to Env-Wt 602.23 "'Highest observable tide line (HOTL)' means *a line defining the farthest landward limit of tidal flow, not including storm events,* that can be recognized by indicators such as the presence of a strand line of flotsam and debris, the landward margin of salt-tolerant vegetation, or a physical barrier that blocks inland flow of the tide." *(emphasis added).* Please re-delineate the HOTL to reflect the highest perigean tide.
5. The project as proposed is not the least environmentally-impacting practicable alternative per Env-Wt 606.06(e)(2). To reduce the potential impacts of this project, revise the TFM Plans to reduce the total length of the proposed tidal docking structure to the terminus of the originally proposed pier.
6. The TFM Plans indicate that the proposed tidal docking structure will impede structures and navigation of currently moored vessels as well as obstruct the rights of passage of near shore watercraft users. Revise the TFM Plans to reduce the total length of the proposed tidal docking structure to the terminus of the originally proposed pier, such that it will not obstruct the rights of passage of near shore watercraft users per Env-Wt 606.06(i), nor impede the passage of non-motorized watercraft or channel navigation to a degree that a reasonable person would find objectionable as required per Env-Wt 606.03(a)(2).

7. The Application indicates that eel grass beds are located in the vicinity of the project. To ensure compliance with Env-Wt 606.03, revise plan sheet C-02, titled "proposed conditions plan," of the TFM Plans to show the locations of all special aquatic sites, including all current and historically supported eel grass beds, at or within 100 feet of the proposed impact areas per Env-Wt 603.07(b)(4).

Please submit the required information as soon as practicable. Pursuant to RSA 482-A:3, XIV(a)(2), **the required information must be received by NHDES Wetlands Bureau within 60 days of the date of this request (no later than January 9, 2027), or the Application will be denied**. Should additional time be necessary to submit the required information, an extension of the 60-day time period may be requested. Requests for additional time must be received prior to the deadline in order to be approved. In accordance with applicable statutes and regulations, the applicant is also expected to provide copies of the required information to the municipal clerk and all other interested parties.

Pursuant to RSA 482-A:3, XIV(a)(3), NHDES Wetlands Bureau will approve or deny the Application within 30 days of receipt of all required information, or schedule a public hearing, if required by RSA 482-A or associated rules.

If you have any questions, please contact me at Kristin.Duclos@des.nh.gov or (603) 559-1516.

Sincerely,

Kristin L. Duclos
Wetlands Specialist, Wetlands Bureau
Land Resources Management, Water Division

Copied: Portsmouth Municipal Clerk/Conservation Commission
TFMoran, Inc. c/o Luke Taylor