



Piscataquog River Local Advisory Committee

32 Circle View Drive, Newbury, NH 03255 | Email: mooseseer@tds.net
www.PiscataquogRiver.org

January 23, 2026

Philip Trowbridge
NHDES Land Resources Management
29 Hazen Drive
Concord, NH 03301

Re: Failure of applicants to send complete applications to the local advisory committee

Mr. Trowbridge,

The Piscataquog River Local Advisory Committee (PRLAC) would like to make New Hampshire Department of Environmental Services (NHDES) aware of a recent trend of the PRLAC not receiving complete shoreland, wetland and AOT applications in a timely manner. This has led to a much-reduced timeline for the PRLAC to comment on permit applications. We ask that NHDES develop and implement proactive solutions to ensure that applicants comply with RSA and Administrative Rule. Below are three recent examples.

An apparent discrepancy between RSA and Administrative Rule led to the delay of the shoreland application 2025-01757 getting to the PRLAC. In the July 31, 2025 RMFI letter, NHDES staff cited RSA 483-B:5-b, IV-a, which states "...the local river management advisory committee...have been notified of the application by certified mail...". This requires the applicant to only notify the LAC of the application, which the applicant did subsequent to the RMFI. However, Env-Wq 1406.13 and an item on the checklist on page 3 of the Shoreland application both state the complete application must be sent to the PRLAC. This led to a long delay of the shoreland application getting to the PRLAC, and ultimately the decision on the application was made by NHDES staff before the PRLAC provided comments. We don't know if the text that was in the RMFI is boilerplate text, but if so, we ask that NHDES consider replacing that text with the correct text from Env-Wq, thus clarifying for applicants that it is the complete application that is to be sent to the relevant local river management advisory committee. We acknowledge that the PRLAC should notify relevant NHDES staff of our intent to provide comments and the date by which we intend to do that.

For the AOT application, 250822-151, NHDES staff were very thorough in including the PRLAC on a request for more information letter about four weeks after the application was submitted to NHDES, at which time the PRLAC realized the application had never been sent. AOT staff, Rivers and Lakes Program staff and the applicant's agent realized the error and then quickly sent the application to the PRLAC. This gave the PRLAC very little time to provide comments, but fortunately the proposed work did not impact wetlands and was very far from the Piscataquog River, and therefore the PRLAC had no concerns about the proposed work.

For the Shoreland Application, 2026-00054, NHDES accepted it as complete on January 9, 2026. The PRLAC was notified by both LRM and Rivers and Lakes Program staff of the



Piscataquog River Local Advisory Committee

32 Circle View Drive, Newbury, NH 03255 | Email: mooseseer@tds.net
www.PiscataquogRiver.org

application on January 9. Unfortunately, as of January 22, 2026, the PRLAC still has not yet received the complete application and the next PRLAC meeting is January 27, 2026. The PRLAC notified Shoreland and Rivers and Lakes Program staff of this on January 21, 2026.

Moving forward, we ask NHDES to develop solutions that will help preclude or reduce these instances and we look forward to learning what the PRLAC can do to help with this. The PRLAC will explicitly notify NHDES staff that we plan to provide comments on an application and by what date.

Sincerely,

John Magee

Chair, PRLAC
mooseseer@tds.net

Cc: PRLAC members; Tracie Sales, NHDES