

HOEFLE, PHOENIX, GORMLEY & ROBERTS, PLLC

ATTORNEYS AT LAW

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September 1, 2021

HAND DELIVERED

Peter Stith, Principal Planner
Portsmouth City Hall
1 Junkins Avenue
Portsmouth, NH 03801

Re: Ronald R. & Mary H. Pressman
449 Court Street
Tax Map 105/Lot 6
Character District CD 4-L1 (CD4-L1); Historic District Overlay

Dear Mr. Stith & Zoning Board Members:

On behalf of the Ronald R. and Mary H. Pressman ("Pressman"), enclosed please find the following in support of a request for zoning relief:

- Land Use Application uploaded to Viewpoint today.
- Owner Authorization.
- 9-1-2021 – Memorandum and exhibits in support of Variance Application (original and 11 copies).

We look forward to presenting this application to the Zoning Board at its September 21, 2021 meeting.

Very truly yours,



R. Timothy Phoenix
Monica F. Kieser

Encl.

cc: Ronald R. & Mary H. Pressman
Jennifer Ramsey, Somma Studios
Ben Auger, Auger Building Co.

DANIEL C. HOEFLE	R. PETER TAYLOR	GREGORY D. ROBBINS	DUNCAN A. EDGAR
R. TIMOTHY PHOENIX	JOHN AHLGREN	MONICA F. KIESER	OF COUNSEL:
LAWRENCE B. GORMLEY	KIMBERLY J.H. MEMMESHEIMER	SAMUEL HARKINSON	SAMUEL R. REID
STEPHEN H. ROBERTS	KEVIN M. BAUM	JACOB J.B. MARVELLEY	

Monica Kieser

From: rrpressman@gmail.com
Sent: Wednesday, September 1, 2021 2:42 PM
To: Monica Kieser
Subject: Authorization

Monica,

We authorize Hoefle, Phoenix, Gormley & Roberts, PLLC to execute all applications before Portsmouth Land Use Boards and to take any and all actions necessary throughout the application and permitting process related to our property at 449 Court Street (Tax Map 105, Lot 6) including but not limited to attendance and presentation at public hearings.

Thanks, Ron and Mary Pressman

Sent from my iPhone

MEMORANDUM

TO: Portsmouth Zoning Board of Adjustment (“ZBA”)
FROM: R. Timothy Phoenix, Esquire
Monica F. Kieser, Esquire
DATE: September 1, 2021
Re: Ronald R. & Mary H. Pressman, Owner/Applicant
Project Location: 449 Court Street
Tax Map 105/Lot 6
Character District 4-L1 (CD4-L1); Historic Overlay District

Dear Chairman Rheume and Zoning Board Members:

On behalf of Ronald R. and Mary H. Pressman (“Pressman”), we are pleased to submit this Memorandum and exhibits in support of zoning relief from the Portsmouth Zoning Ordinance (“PZO”) to be considered by the Portsmouth Zoning Board of Adjustment (“ZBA”) at its September 21, 2021 Meeting.

I. EXHIBITS

- A. Reference Plans – Ambit Engineering, Inc.
 - Condominium Site Plan Tax Map 105-Lot 12, 58 State Street, RCRD D-35565
 - Access & Utility Easement Plan, RCRD B-33773
- B. Architectural Plan Set – issued by Somma Studios.
- C. Existing/Proposed Renderings – issued by Tangram 3DS.
- D. Site Photographs
 - Satellite
 - Existing/Proposed View from Deck/Penthouse.
- E. Tax Map 105.

II. PROPERT/PROJECT

449 Court Street is a 2744 s.f. lot a few doors down from Prescott Park and across the Street from Strawberry Banke. Upon the lot is a three-story single-family home with an existing height of 34.92 ft.¹ served by a small driveway which also serves 58 State Street. (**Exhibit A, Access & Utility Easement Plan**). The existing home is located approximately 10 inches from the left side lot line. The Access Easement swallows outdoor space and almost all the first floor is a garage. Three small balconies permit minimal, isolated outdoor seating. Pressman intends a small dormered addition within the existing left side wall which will access a small roof deck facing Prescott Park. The addition will result in a height of 41.42 ft. (41 ft. 5 inches), which is

¹ Exhibit B illustrates an existing height of 34 ft. 11 in. or 34.92 ft. measured from the grade plane to the mid-point between the level of the eaves and the highest point of the roof as required by the PZO. The existing roof peak is 38 ft. 5 in. or 38.92 ft.

three feet higher than the existing roof peak (the “Project”). The proposed height will remain less than the home next door and less than the height of 58 State Street.

III. RELIEF REQUIRED

1. PZO §10.5A43.31 – To permit a 4th story dormered addition with a height of 41.5 ft.² where 34.92 ft. exists and 35 ft. is required.³
2. PZO §10.5A41.10A – To permit a 4th floor dormered addition 10 in. from the left side lot line where 10 in. exists, and 5 ft. is required.

IV. VARIANCE REQUIREMENTS

1. The variances will not be contrary to the public interest.
2. The spirit of the ordinance is observed.

The first step in the ZBA’s analysis is to determine whether granting a variance is not contrary to the public interest and is consistent with the spirit and intent of the ordinance, considered together pursuant to Malachy Glen Associates, Inc. v. Town of Chichester, 155 N.H. 102 (2007) and its progeny. Upon examination, it must be determined whether granting a variance “would unduly and to a marked degree conflict with the ordinance such that it violates the ordinance’s basic zoning objectives”. Id. “Mere conflict with the zoning ordinance is not enough”. Id.

The purpose of the Portsmouth Zoning Ordinance as set forth in PZO §10.121 is “to promote the health, safety and the general welfare of Portsmouth and its region in accordance with the City of Portsmouth Master Plan... [by] regulating”:

1. The use of land, buildings and structures for business, industrial, residential and other purposes – Single family homes are permitted in the CD4-L1 Zone. The existing home has long existed in its current configuration just off the side lot line. The requested relief permits a small addition and roof deck, but will not change the use of the current home.

2. The intensity of land use, including lot sizes, building coverage, building height and bulk, yards and open space – The proposed height of 41.5 ft. is approximately 3 ft. higher than the existing peak and still shorter than home on the left and the condominiums at 58 State Street. Abutting homes are also shielded by thick tree cover, so the proposed addition will not undermine these purposes of the Ordinance.

² Exhibit B illustrates a proposed height of 41 ft. 5 in. or 41.42 ft, and an existing height of 34 ft. 11 in.

³ The Property is in height area 2 stories/short 3rd (Map 10.5A.21.B) resulting in permitted 3 stories and permitted height of 35 feet, although a penthouse can exceed the height requirement by 2 ft. (Map 10.5A21B).

3. The design of facilities for vehicular access, circulation, parking and loading – The Project will not impact existing parking or vehicular access.

4. The impacts on properties of outdoor lighting, noise, vibration, stormwater runoff and flooding – None of these are negatively affected by the requested relief, which will permit an addition within the confines of the existing side walls. The proposed roof deck will be used seasonally and exists among other upper level decks.

5. The preservation and enhancement of the visual environment – The Project is shielded by a firewall on one side and tree cover on another.

6. The preservation of historic districts, and buildings and structures of historic or architectural interest – The Project has been presented to the Historic District Commission in work sessions and must obtain a Certificate of Approval.

7. The protection of natural resources, including groundwater, surface water, wetlands, wildlife habitat and air quality – The Project is entirely contained within the existing footprint and does not increase lot coverage over existing conditions. Accordingly, these objectives of the PZO are not negatively affected by the proposal.

Based upon the foregoing, none of the variances “in a marked degree conflict with the ordinance such that they violate the ordinance’s basic zoning objectives”. Malachy Glen, supra, which also held:

One way to ascertain whether granting the variance would violate basic zoning objectives is to examine whether it would alter the essential character of the locality.... . Another approach to [determine] whether granting the variance violates basic zoning objectives is to examine whether granting the variance would threaten the public health, safety or welfare. (emphasis added)

Although just outside the Downtown Overlay District, the Property is in the densely developed portion of the City between the Strawberry Banke Museum grounds and State Street, with its taller buildings. The surrounding area includes other upper level decks. The proposed addition is significantly less than the floor below, is shorter than two abutting properties and screened from by thick tree cover. The use of the property will not change, thus granting each variance will neither “alter the essential character of the locality,” nor “threaten the public health, safety or welfare”.

3. Granting the variance will not diminish surrounding property values.

The requested relief allows for the addition of a dormered addition within the existing left side wall and the addition of a roof top deck on the right side affording views of Prescott Park. The left side setback will not change, and the right side setback is compliant. Abutting the property is the condominiums at 58 State Street with at least three upper level decks. The Project is well screened by the existing firewall on the left and significant tree cover on the right and rear sides of the Property. Considering these factors, granting the variances will not diminish surrounding property values.

4. Denial of the variances results in an unnecessary hardship.

a. Special conditions distinguish the property/project from others in the area.

The Property is just 2744 s.f. and 43 ft. wide and already developed. The location of the existing home dictates the placement of any proposed addition. Here the narrow lot contains a home 10 inches from the left side boundary. In addition, the lot is further burdened by a 16 ft. wide access easement running the length of the right side of the Property. There is little, if any, space for outdoor living save the existing tiny balconies. To provide parking on the lot, nearly the entire first floor is a garage, reducing interior living space. These conditions combine to create special conditions.

b. No fair and substantial relationship exists between the general public purposes of the ordinance and its specific application in this instance.

Height restrictions exist to maintain adequate air and light for abutting properties while yard requirements promote the same goals and ensure there is sufficient space between neighbors for stormwater treatment. The Project will maintain the existing left side setback and comply with the right side, rear, and front yard setbacks. The increase in height is three feet above the existing ridge of the building and five feet, but still less than the height of the homes to the left and rear. In addition, significant tree cover shields the impact of the Project from the neighbors on the right. For all of these reasons, there is no fair and substantial relationship between the general public purposes of these provisions of the PZO and their specific application to the Property.

c. The proposed use is reasonable.

If the use is permitted, it is deemed reasonable. Vigeant v. Hudson, 151 N.H. 747 (2005). The property will remain a single-family residence, which is permitted in the CD4-L1

Zone. As such, and for all the reasons stated, this proposed use is reasonable, and denial will result in an unnecessary hardship.

5. Substantial justice will be done by granting the variance.

If “there is no benefit to the public that would outweigh the hardship to the applicant” this factor is satisfied. Harborside Associates, L.P. v. Parade Residence Hotel, L.L.C., 162 N.H. 508 (2011). That is, “any loss to the [applicant] that is not outweighed by a gain to the general public is an injustice”. Malachy Glen, supra at 109. Pressmans are constitutionally entitled to the use of the lot as they see fit; including the proposed expansion to accommodate a dormered addition and roof deck, subject only to the effect of the Project on yard and height requirements. “The right to use and enjoy one's property is a fundamental right protected by both the State and Federal Constitutions.” N.H. CONST. pt. I, arts. 2, 12; U.S. CONST. amends. V, XIV; Town of Chesterfield v. Brooks, 126 N.H. 64 (1985) at 68. Part I, Article 12 of the New Hampshire Constitution provides in part that “no part of a man's property shall be taken from him, or applied to public uses, without his own consent, or that of the representative body of the people.” Thus, our State Constitutional protections limit the police power of the State and its municipalities in their regulation of the use of property. L. Grossman & Sons, Inc. v. Town of Gilford, 118 N.H. 480, 482 (1978). “Property” in the constitutional sense has been interpreted to mean not the tangible property itself, *but rather the right to possess, use, enjoy and dispose of it.* Burrows v. City of Keene, 121 N.H. 590, 597 (1981). (Emphasis added).

The Supreme Court has held that zoning ordinances must be reasonable, not arbitrary and must rest upon some ground of difference having fair and substantial relation to the object of the regulation. Simplex Technologies, Inc. v. Town of Newington, 145 N.H. 727, 731 (2001); Chesterfield at 69. To “determine whether an ordinance is arbitrary and unreasonable, the injury or loss to the landowner must be balanced against the gain to the public.” Metzger v. Town of Brentwood, 117 N.H. 497, 501 (1977). In other words, [w]hen the restriction as applied to a particular piece of land is unnecessary to accomplish a legitimate public purpose or the gain to the public is slight but the harm to the citizen and his [or her] property is great, the exercise of the police power becomes arbitrary and unreasonable, and this court will afford relief under the constitution of this state. Id. at 503.

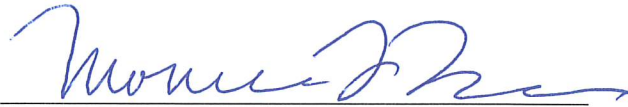
Pressmans have the right to reasonable use of this small lot. Given that the Project is: inset within the existing left side wall, complies with right, front, and rear yard setbacks,

increases height just three feet above the existing ridge, and is screened by taller buildings and significant tree cover, the public will not be benefited by denying the variances. Denial of any variance, however, greatly harms Pressman as they cannot construct the small addition increasing their interior and exterior living space. Accordingly, the loss to the applicant from denial of the variance exceeds any gain to the public from such denial and denial would result in an unreasonable and unconstitutional taking.

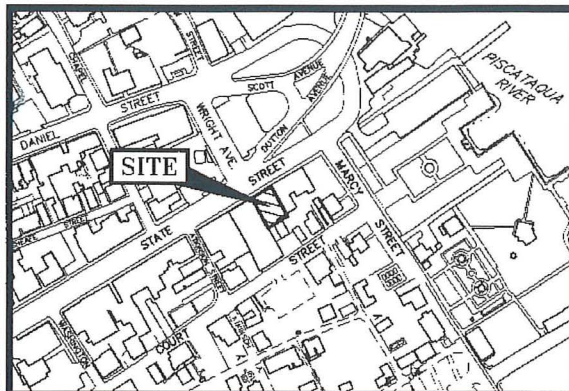
V. CONCLUSION

For all the reasons stated, Pressman respectfully requests that the Portsmouth Zoning Board of Adjustment grant the requested variances.

Respectfully submitted,
Ronald R. and Mary H. Pressman



By: R. Timothy Phoenix
Monica F. Kieser

C/H
L-CHIP
ROA003003

LOCATION MAP

1" = 200'

PLAN REFERENCES:

- 1) PLAN OF LOT, No. 46 STATE STREET, PORTSMOUTH, N.H., 1 IN. = 10 FT., DEC. 1955 BY JOHN W. DURGIN CIVIL ENGINEERS. RCRD FILE 2836, PLAN L-161. RCRD 1381 / 231.
- 2) LOT LINE REVISION, PORTSMOUTH, N.H., FOR SAMUEL SHAPIRO ESTATE, 1 INCH = 10 FEET, MARCH 1977 BY JOHN W. DURGIN CIVIL ENGINEERS PROFESSIONAL ASSOCIATION. RCRD C-6816.
- 3) CONDOMINIUM SITE PLAN OF FEDERAL ROW CONDOMINIUM FOR FEDERAL ROW TRUST, 38 STATE STREET, PORTSMOUTH, N.H., 1" = 10', OCTOBER 1985 BY RICHARD P. MILLETTE AND ASSOCIATES. RCRD D-14416.
- 4) EXISTING FEATURES PLAN FOR 449 COURT STREET, LLC, OWNER, FOR PROPERTY LOCATED AT 58 STATE STREET, PORTSMOUTH, N.H., 1" = 10', JANUARY 13, 2004 BY MILLETTE, SPRAGUE & COLWELL, INC. NOT RECORDED.
- 5) ACCESS & UTILITY EASEMENT PLAN, JASON & BARBARA THEODORE TO MARCH TWENTY TWO, LLC & STEPHEN KELM, 449 COURT STREET, CITY OF PORTSMOUTH. DATED APRIL 19, 2006 BY AMBIT ENGINEERING, INC. RCRD B-33773.
- 6) LOT LINE RELOCATION PLAN, TAX MAP 105 - LOT 11 & TAX MAP 105 - LOT 12 FOR STEPHEN KELM & MARCH TWENTY-TWO, LLC, 46 & 58 STATE STREET CITY OF PORTSMOUTH COUNTY OF ROCKINGHAM STATE OF NEW HAMPSHIRE. DATED JUNE 7, 2006 BY AMBIT ENGINEERING. RCRD D-34257.
- 7) LOT LINE RELOCATION PLAN, TAX MAP 105, LOT 12 & TAX MAP 105, LOT 13, 58 & 68 STATE STREET, 1" = 10', MARCH 2007 BY AMBIT ENGINEERING. RCRD D-34720.

I, JOHN R. CHAGNON, LICENSED LAND SURVEYOR, HEREBY CERTIFY:

- A) THAT THIS SITE PLAN ACCURATELY DEPICTS THE LOCATION AND DIMENSIONS OF THE IMPROVEMENTS SHOWN HEREON, SPECIFICALLY UNITS ONE EAST, ONE WEST, TWO, & THREE, AND
- B) THAT SAID UNITS ONE EAST, ONE WEST, TWO, & THREE, HAVE BEEN SUBSTANTIALLY COMPLETED, AND
- C) THAT THIS PLAN COMPLIES WITH THE PROVISIONS OF RSA 356-B: 20.

John R. Chagnon
JOHN R. CHAGNON, LLS #738

7/22/08
DATE

THIS PLAN IS A CONDOMINIUM INSTRUMENT UNDER RSA CHAPTER 356-B AND IS NOT A SUBDIVISION OF LAND.

I CERTIFY THAT THIS SURVEY PLAT IS NOT A SUBDIVISION PURSUANT TO THIS TITLE AND THAT THE LINES OF STREETS AND WAYS SHOWN ARE THOSE OF PUBLIC OR PRIVATE STREETS OR WAYS ALREADY ESTABLISHED AND THAT NO NEW WAYS ARE SHOWN.

John R. Chagnon
JOHN R. CHAGNON, LLS #738

7/22/08
DATE

LEGEND:

N/F
RP
RCRD

RR SPK FND
IR FND
IP FND
DH FND

AC

RR SPK SET
IR SET
IP SET
DH SET

NOW OR FORMERLY
RECORD OF PROBATE
ROCKINGHAM COUNTY REGISTRY
OF DEEDS

MAP 11/LOT 21

RAILROAD SPIKE FOUND / SET
IRON ROD FOUND / SET
IRON PIPE FOUND / SET
DRILL HOLE FOUND / SET

AIR CONDITIONING PAD

N/F JOE W. HUNT &
PAMELA HUNT
80 STATE STREET
PORTSMOUTH, N.H. 03801
3036/2091
C-13956
D-23111

TBM
PSNH 3/2
VZ 97/2
EL. 20.80

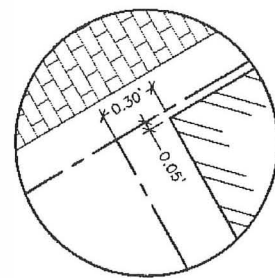
N/F JASON & BARBARA
THEODORE
449 COURT STREET
PORTSMOUTH, N.H. 03801
4881/2897

N/F 88 STATE STREET, LLC
2025 WOODBURY AVENUE
NEWINGTON, NH 03801
4686/1368
D-34720

N/F JASON & BARBARA
THEODORE
449 COURT STREET
PORTSMOUTH, N.H. 03801
4593/1232
C-6816

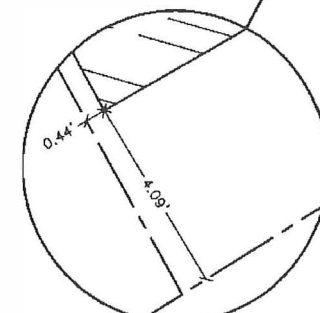
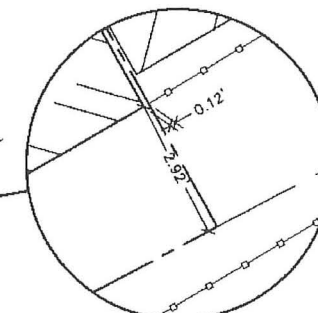
N/F ARGENTAS N. & ELOISE M.
KARABELAS
128 HODGE ROAD
PRINCETON, N.J. 08540
3145/1485

N/F STRAWBERRY BANK, INC.
P.O. BOX 300
PORTSMOUTH, NH 03802

BUILDING OFFSET
NTS

LENGTH TABLE

No.	Bearing	Distance
L1	S62°29'52"W	6.84'
L2	S59°47'00"W	15.08'
L3	N29°43'00"W	0.36'
L4	S58°46'35"W	11.71'
L5	S58°26'12"W	13.09'

BUILDING OFFSET
NTSBUILDING OFFSET
NTS

GRAPHIC SCALE
1" = 10'

10 5 0 10 20 30 40
5 0 5 10 15 20
FEET METERS

AMBIT ENGINEERING, INC.
Civil Engineers & Land Surveyors
280 Griffin Road - Unit 3
Portsmouth, N.H. 03801-7114
Tel (603) 430-9202
Fax (603) 430-2315

NOTES:

- 1) PARCEL IS SHOWN ON THE CITY OF PORTSMOUTH ASSESSORS MAP 105 AS LOT 12.
- 2) OWNER OF RECORD:
MARCH TWENTY-TWO, LLC
121 BOW STREET
PORTSMOUTH, N.H. 03801
4454/2556 & 4716/221 (4933/2798)
D-34257
- 3) PARCEL IS NOT IN A FLOOD HAZARD ZONE AS SHOWN ON FIRM 33015C0259E, EFFECTIVE MAY 17, 2005.
- 4) EXISTING LOT AREA (SUBMITTED AREA):
3,304 S.F.
0.0759 AC.
- 5) PARCEL IS LOCATED IN CENTRAL BUSINESS B AND HISTORIC DISTRICT A.
- 6) THE PURPOSE OF THIS PLAN IS TO SHOW THE DECLARATION OF A 4 UNIT CONDOMINIUM ON THE PROPERTY.
- 7) DATUM:
USGS MEAN SEA LEVEL, NGVD 1929.
BENCHMARK: DISK (MEMO)
USGS 25.69
- 8) OFFSETS SHOWN HEREON ARE PERPENDICULAR TO BOUNDARY LINES
- 9) SEE EASEMENT DEEDS TO BENEFIT PROPERTY RECORDED AT RCRD 4552/1887, 4654/2592, AND 4731/1795.
- 10) PROPERTY IS BURDENED BY EASEMENT FOR ACCESS TO 46 STATE STREET RECORDED AT RCRD 4716/0221.
- 11) UNDERGROUND UTILITY LOCATIONS ARE BASED UPON BEST AVAILABLE EVIDENCE AND ARE NOT FIELD VERIFIED. LOCATING AND PROTECTING ANY ABOVEGROUND OR UNDERGROUND UTILITIES IS THE SOLE RESPONSIBILITY OF THE CONTRACTOR AND/OR THE OWNER. UTILITY CONFLICTS SHOULD BE REPORTED AT ONCE TO THE DESIGN ENGINEER.

EXHIBIT A

NO.	DESCRIPTION	DATE
1	ISSUED FOR RECORDING	7/22/08
0	ISSUED FOR COMMENT	7/7/08

CONDOMINIUM SITE PLAN
TAX MAP 105 - LOT 12
58 STATE STREET,
A CONDOMINIUM
FOR
MARCH TWENTY-TWO, LLC

58 STATE STREET
CITY OF PORTSMOUTH
COUNTY OF ROCKINGHAM
STATE OF NEW HAMPSHIRE

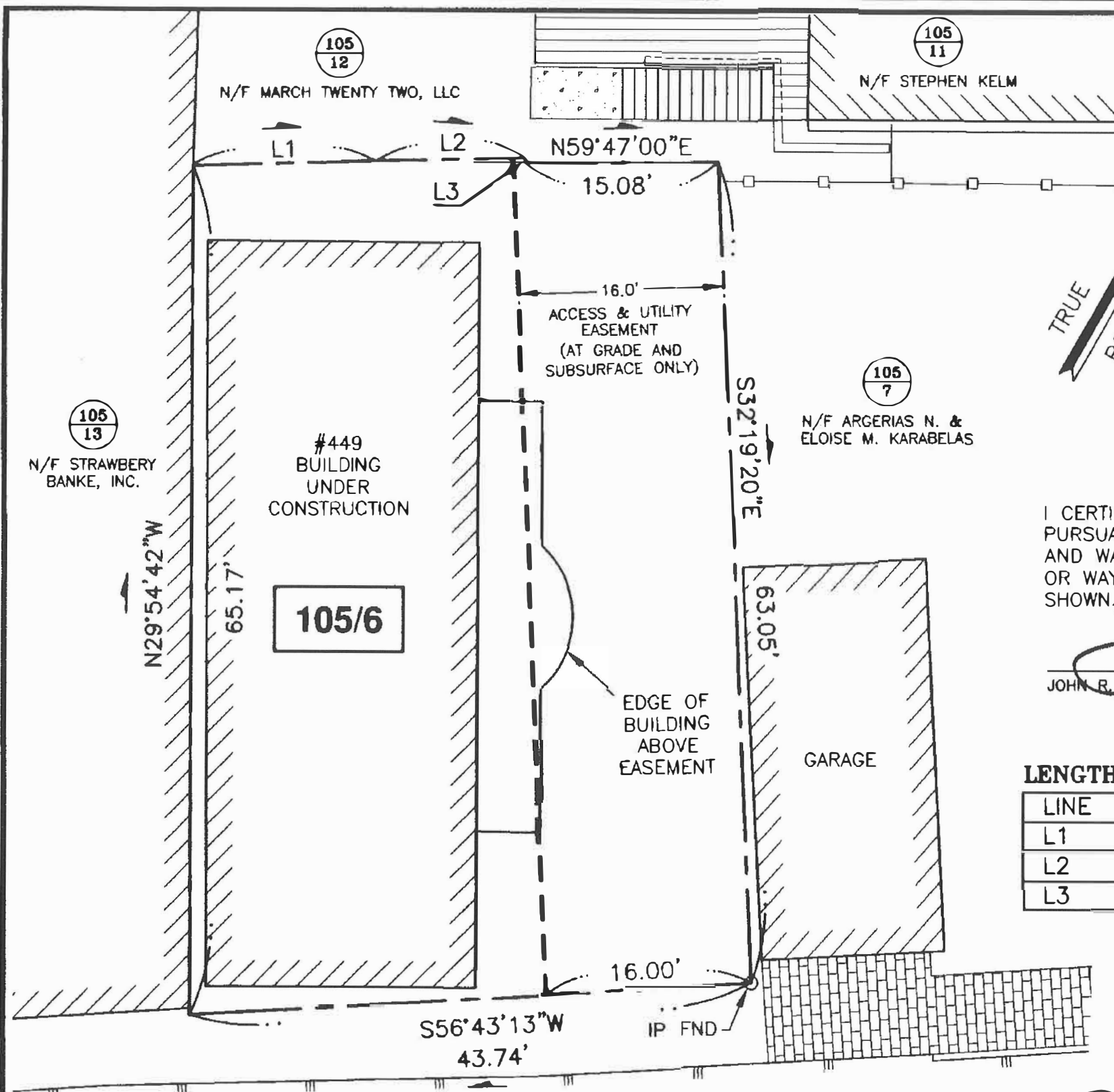
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JULY 2008

FB 169 PG 18

1514

D-35565



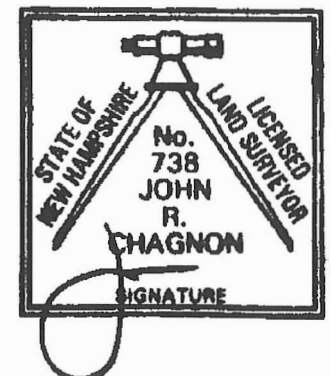
NOTES:

- 1) PARCEL IS SHOWN ON THE CITY OF PORTSMOUTH ASSESSOR'S MAP 105 AS LOT 6.
- 2) OWNER OF RECORD:
JASON N. & BARBARA THEODORE
16 LEIGHTON ROAD
DOVER, NH 03820
RCRD 4593/1232
- 3) THE PURPOSE OF THIS PLAN IS TO SHOW THE LOCATION OF AN ACCESS EASEMENT TO BE GRANTED BY JASON & BARBARA THEODORE (105/6) TO MARCH TWENTY-TWO, LLC (105/12) AND STEPHEN KELM (105/11). EASEMENT DEED TO BE RECORDED HERewith.
- 4) PARCEL IS SUBJECT TO A DRAINAGE EASEMENT TO BENEFIT 105/12. SEE RCRD 4552/1887.

I CERTIFY THAT THIS SURVEY PLAT IS NOT A SUBDIVISION PURSUANT TO THIS TITLE AND THAT THE LINES OF STREETS AND WAYS SHOWN ARE THOSE OF PUBLIC OR PRIVATE STREETS OR WAYS ALREADY ESTABLISHED AND THAT NO NEW WAYS ARE SHOWN.

[Signature]
JOHN R. CHAGNON, LLS #738

4/27/06
DATE



LENGTH TABLE

LINE	BEARING	DISTANCE
L1	N58°26'12"E	14.24'
L2	N58°46'35"E	11.71'
L3	S29°43'00"E	0.36'

ACCESS & UTILITY EASEMENT PLAN
JASON & BARBARA THEODORE
TO
MARCH TWENTY TWO, LLC
& STEPHEN KELM
449 COURT STREET
CITY OF PORTSMOUTH
COUNTY OF ROCKINGHAM
STATE OF NEW HAMPSHIRE

SCALE: 1" = 10'

APRIL 19, 2006

COURT STREET

B-33773

GRAPHIC SCALE

1" = 10'

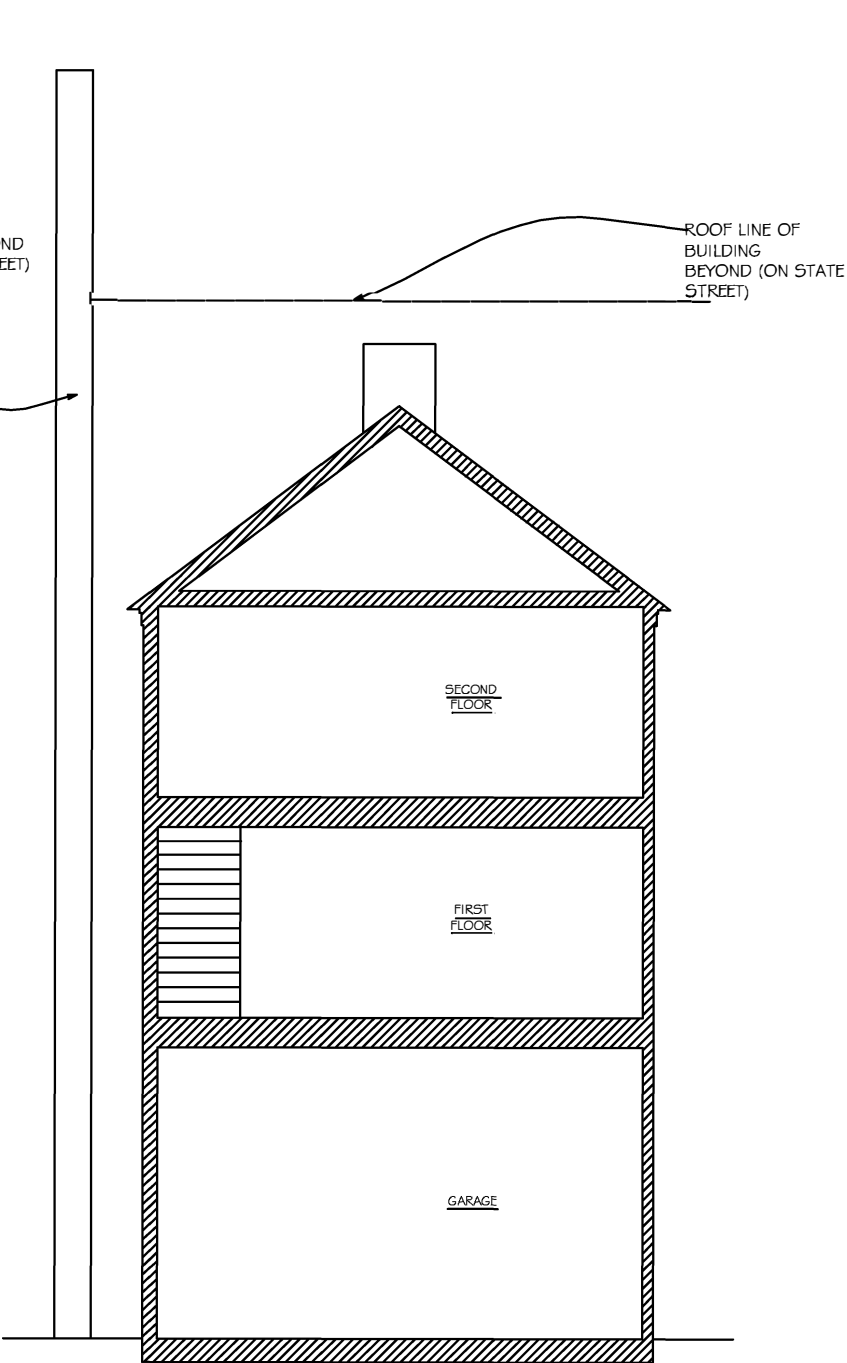


AMBIT ENGINEERING, INC.
Civil Engineers & Land Surveyors

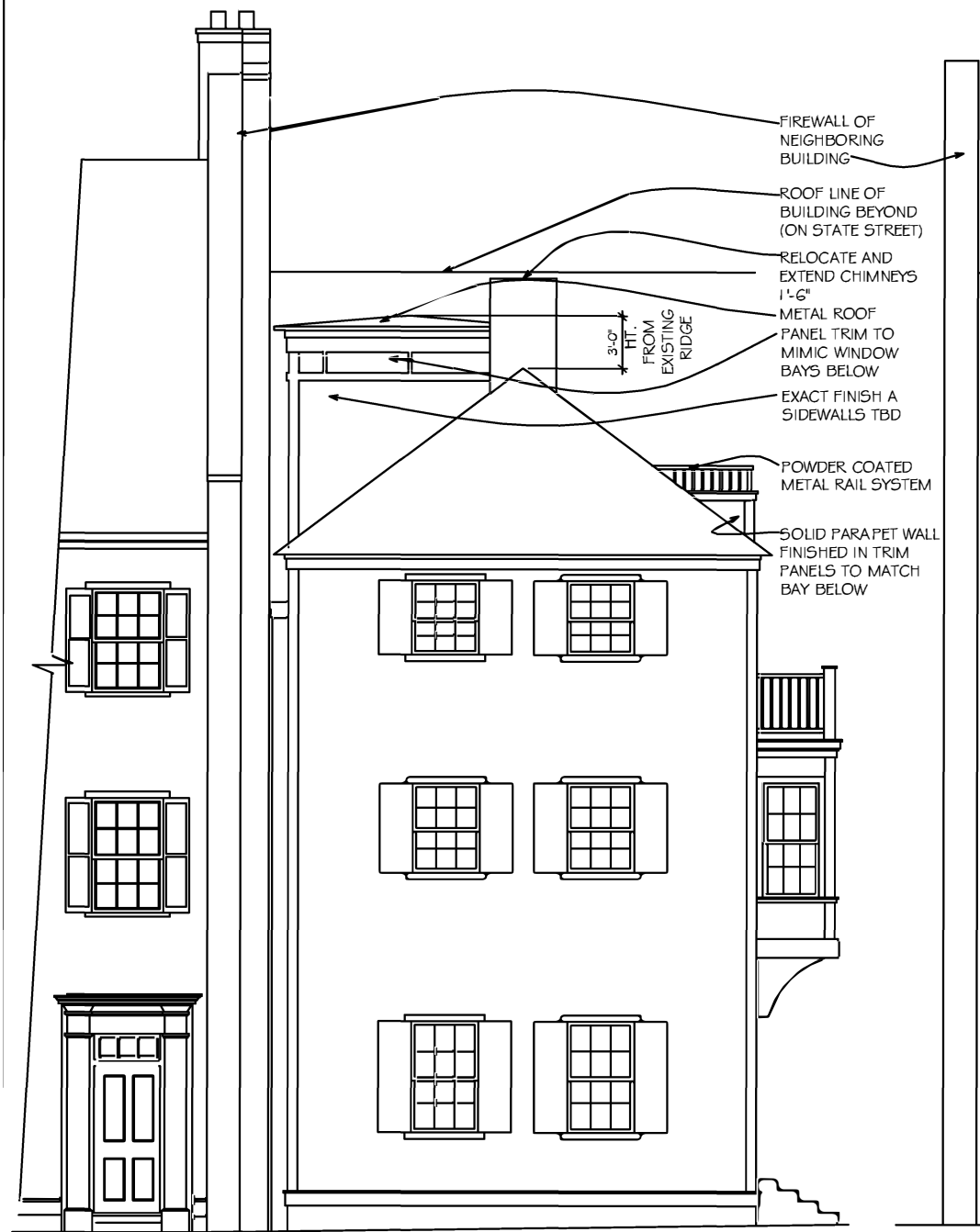
200 GRIFFIN ROAD, UNIT 3
Portsmouth, N.H. 03801-4255
Tel (603) 430-9282
Fax (603) 436-2315



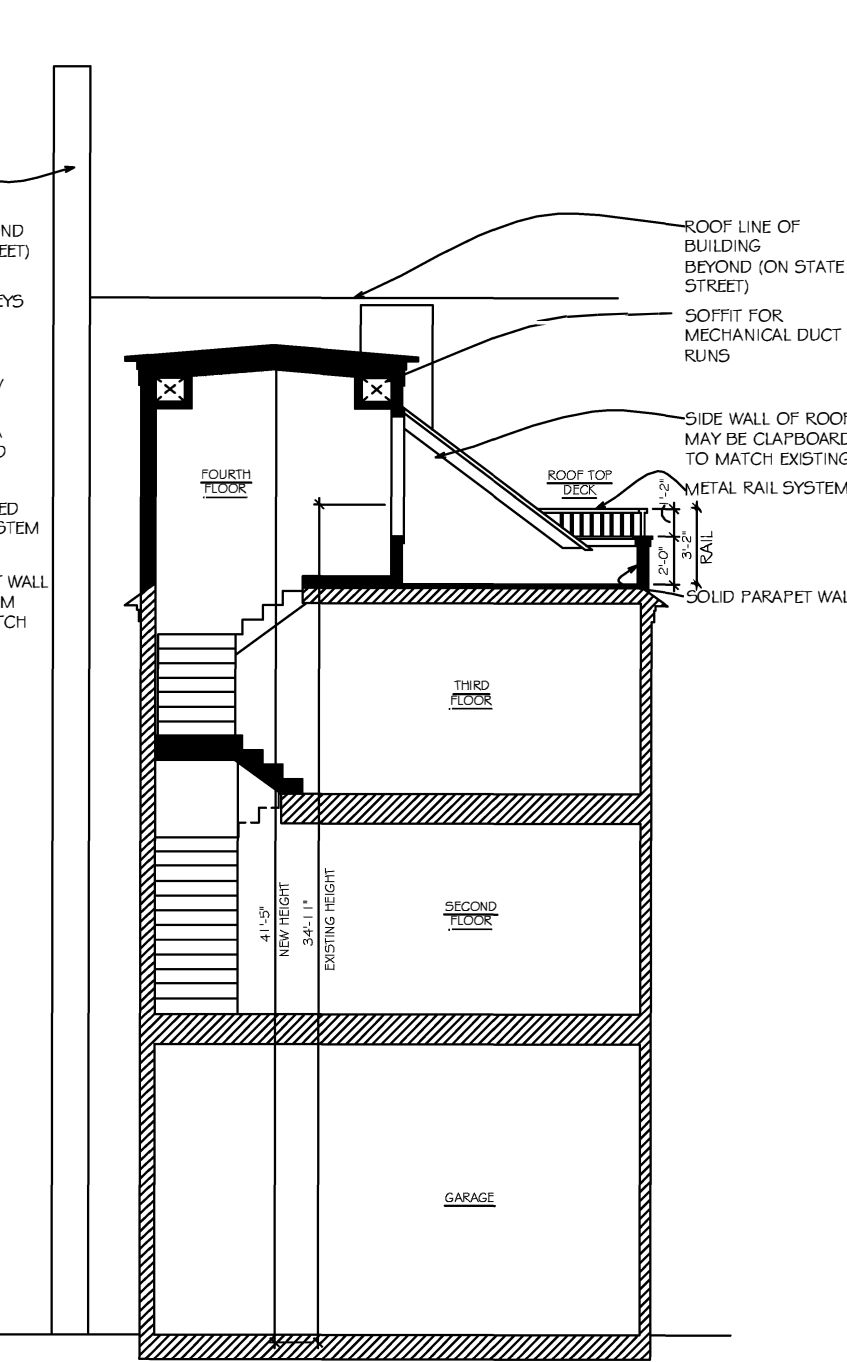
EXISTING VIEW FROM COURT STREET



EXISTING SECTION



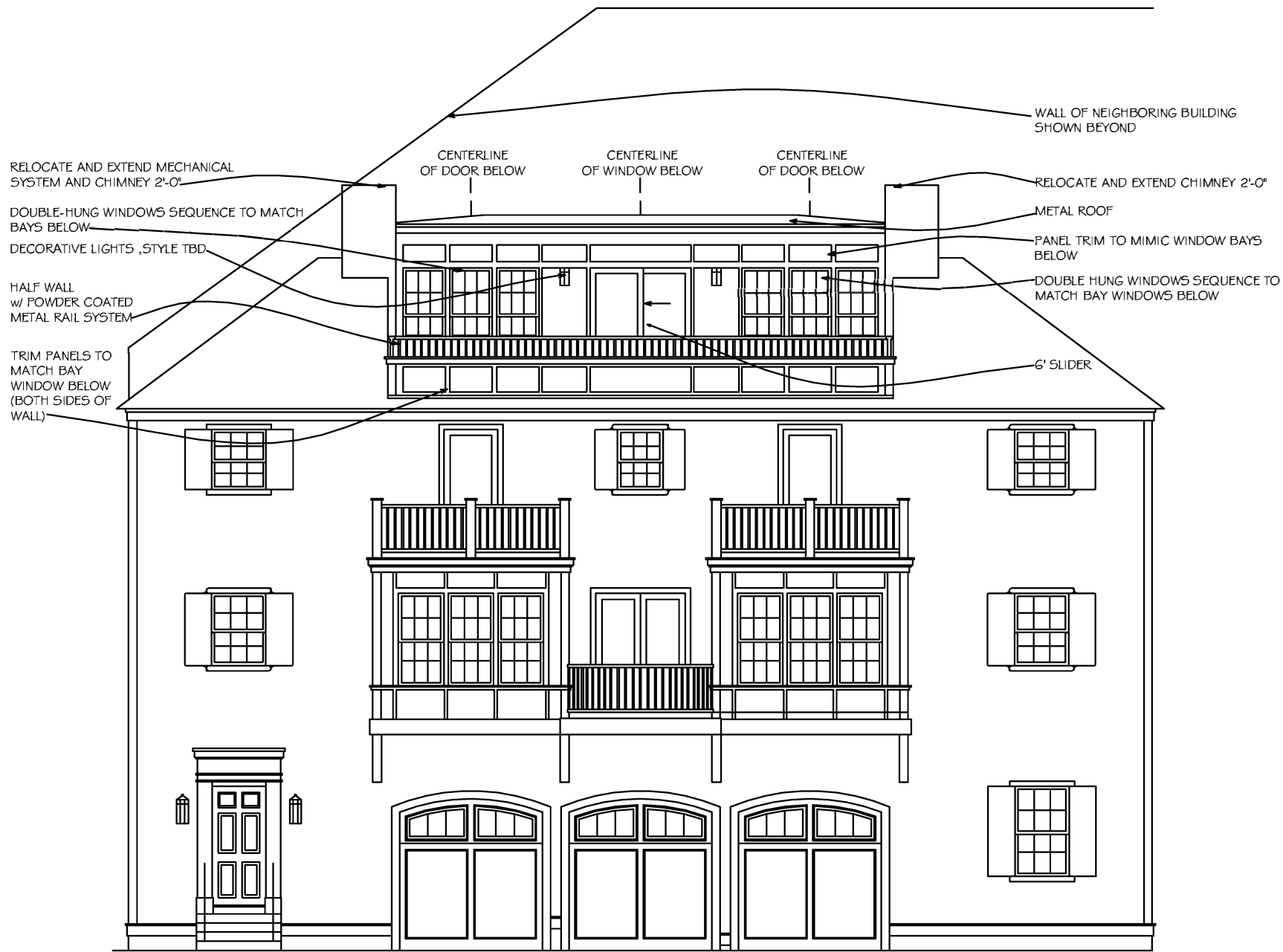
PROPOSED VIEW FROM COURT STREET



PROPOSED SECTION



EXISTING VIEW FROM DRIVEWAY



PROPOSED VIEW FROM DRIVEWAY

Exhibit C

Existing

TANGRAM 3DS

View #1



Proposed

TANGRAM 3DS



Existing

TANGRAM 3DS



Proposed

TANGRAM 3DS

449 Court Street (See pin for Market Square Capital)



Imagery ©2021 Google, Imagery ©2021 Maine GeoLibrary, Maxar Technologies, U.S. Geological Survey, Map data ©2021 Google 20 ft



View from 449 Court St.
2nd floor bedroom



View from 449 Court St.
3rd floor balcony



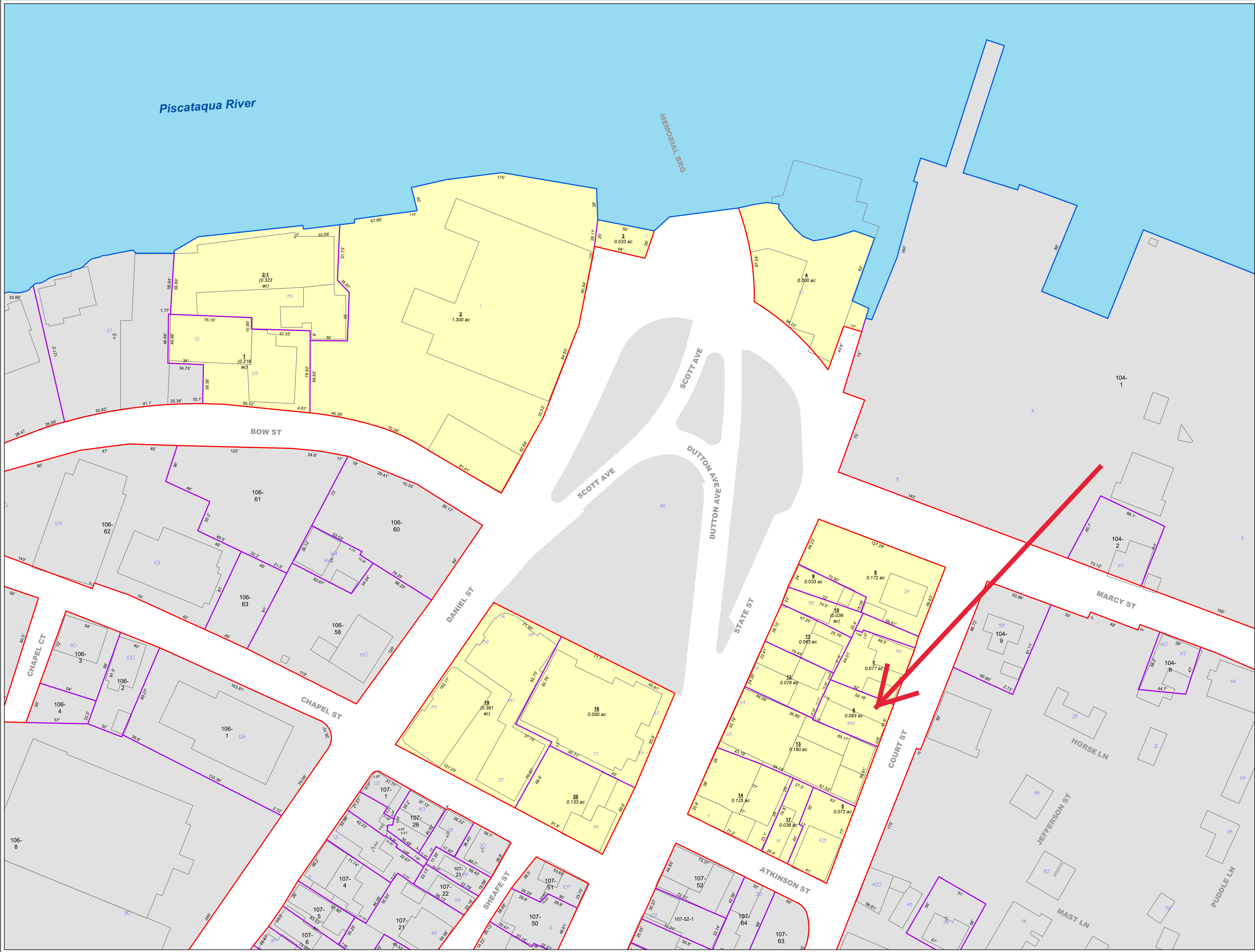
Proposed View from 449 Court St.
37 ft. elevation @ eye level



Proposed View from 449 Court St.
38 ft. elevation @ eye level



AfZWgbbWVWWWJeahWaa] [Y
&& 5agd EfdW6qhW/Sk



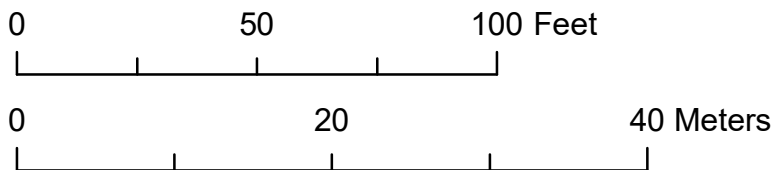
Partial Legend
See the cover sheet for the complete legend.

7-5A Lot or lot-unit number
2.56 ac Parcel area in acres (ac) or square feet (sf)
23 Address number
233-137 Parcel number from a neighboring map
68' Parcel line dimension
SIMS AVE Street name

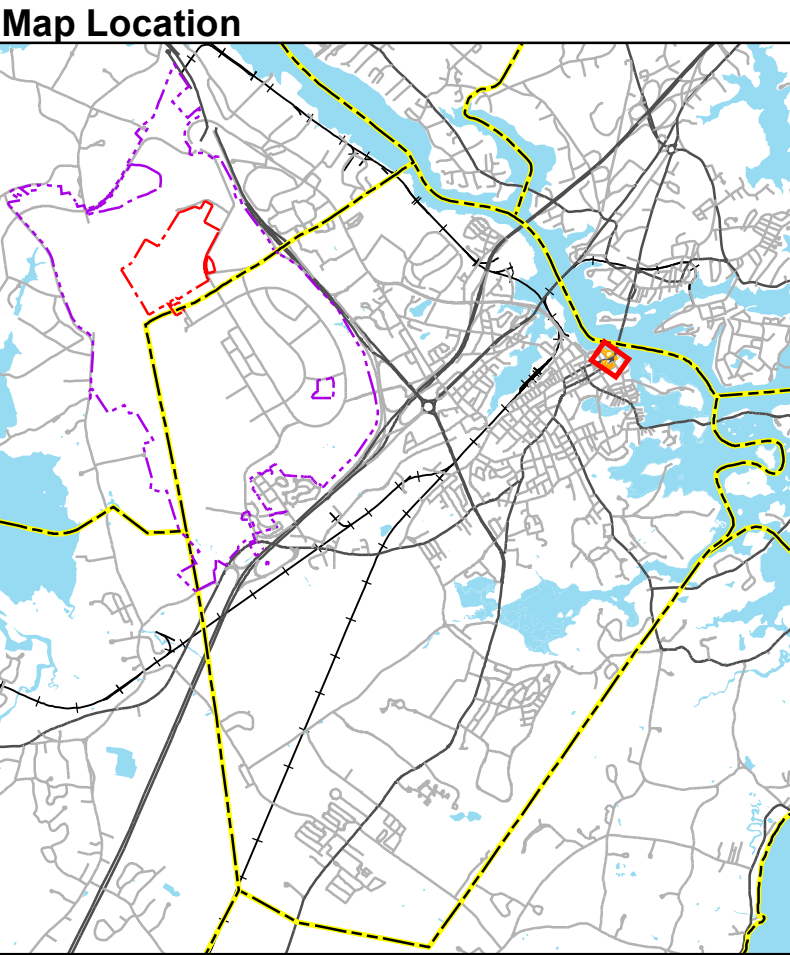
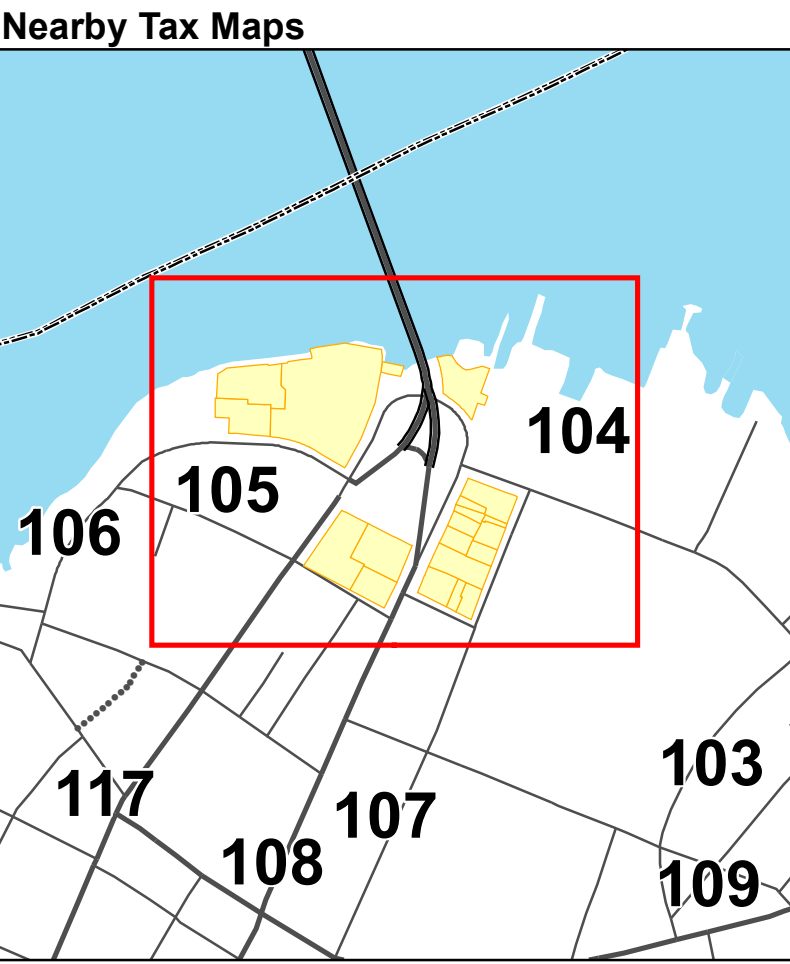
Parcel/Parcel boundary
Parcel/ROW boundary
Water boundary
Structure (1994 data)

Parcel covered by this map
Parcel from a neighboring map (see other map for current status)

EXHIBIT E



This map is for assessment purposes only. It is not intended for legal description or conveyance. Parcels are mapped as of April 1. Building footprints are 2006 data and may not represent current structures. Streets appearing on this map may be paper (unbuilt) streets. Lot numbers take precedence over address numbers. Address numbers shown on this map may not represent posted or legal addresses.



Portsmouth, New Hampshire
2020

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