

February 13, 2026

Town of Concord
Zoning Board of Appeals
141 Keyes Road
Concord, MA 01742

Attn: Christine Zale, Senior Planner

**RE: Floodplain Special Permit Narrative
Concord Country Store, LLC
166 Commonwealth Ave
Concord, MA 01742**

Dear Members of the Board:

Pursuant to §7.2.6.1 of the Town of Concord Zoning Bylaw, the Applicant addresses the following criteria for use within the Floodplain Conservancy District:

§7.2.6.1(a) - A written statement detailing the proposed work, the history of flooding at the subject premises and the calculations of the volume of water which will be displaced prepared by a registered professional engineer or a registered land surveyor;

The Applicant proposes to redevelop the existing site and reconfigure the existing building into a new 2,162 SF freestanding country store and self-service fuel station along with paved parking areas, landscaping, utilities, site lighting, and stormwater management system. Overall, the project as proposed results in a 2,633 SF reduction of impervious area. We are not aware of any historic flooding at the subject site. The site has been designed to provide compensatory flood storage for the volume of water being displaced on an incremental basis. As a result of redevelopment, 974.4 cubic feet of flood storage is lost and replaced with 1,010.0 cubic feet of flood storage. Additional calculations of flood storage on an incremental basis can be found in Table 1: Incremental Flood Storage Calculations below:

Table 1: Incremental Flood Storage Calculations

Elevation Range	Existing Volume Provided (CY)	Proposed Volume Provided (CY)	Net Volume Provided (CY)	Net Volume Provided (CF)
120-121	0.0	0.1	0.1	1.4
121-122	0.5	0.7	0.2	6.2
122-123	1.5	2.3	0.8	22.4
123-124	34.1	34.3	0.2	5.7
Total	36.1	37.4	1.3	35.6

§7.2.6.1(b) - Development plans, including specific topographic details within the floodplain, meeting, to the extent applicable, the requirements set forth for a definitive plan in the Subdivision Rules and Regulations of the Planning Board. For subdivisions or other developments greater than 50 lots or 5 acres (whichever is less), technical data to determine base flood elevations shall be provided for each developable parcel shown on the design plans;

Development plans, including topographic details within the floodplain meeting the requirements set forth for a definitive plan are provided to the maximum extent applicable. The subject redevelopment project is not a subdivision, therefore technical data to determine base flood elevation is not applicable. The subject site is located within Flood Zone AE with Base Flood Elevation (BFE) 124 per FEMA panel #25017C0359F eff. 7/72014.

§7.2.6.1(c) - Plans showing compensatory storage at a 1.5:1 ratio for floodplain displaced by the proposed project, prepared by a registered professional engineer, detailed in tabular format, in 1-foot incremental elevations of fill and storage volumes in cubic feet, with cut and fill areas shown on a plan. The 1.5:1 compensatory storage ratio does not need to be obtained at each 1-foot increment and may be obtained as a total over the floodplain area, but a minimum of 1:1 ratio shall be maintained at all 1-foot increments;

Compensatory storage at a 1.5:1 ratio for floodplain displaced is not provided due to the small size of the lot and reuse of the existing building. However, compensatory storage at the required minimum of 1:1 ratio is provided at all 1-foot increments. Pursuant to §7.2.6.3, the Board may allow a decrease in the required compensatory storage to a 1:1 ratio based upon a recommendation of the Natural Resources Commission and finding that the reduction in the compensatory storage allows for an overall improvement to the site. The proposed redevelopment significantly improves stormwater management on site through the 2,633 SF reduction of impervious area across the site and improved stormwater quality and recharge provided via a proprietary stormwater quality unit and proposed underground infiltration trench. The redevelopment improves the natural environment by replacing paved areas within the 25'- and 50'-buffer with new plantings of native species adjacent to the wetlands and Nashoba Brook. The compensatory storage provided has unrestricted hydraulic connection to the same waterway. Therefore, we respectfully request the Board allow a decrease of the required compensatory storage to a 1:1 ratio. Additional calculations of flood storage on an incremental basis can be found in Table 1: Incremental Flood Storage Calculations.

§7.2.6.1(d) - In A Zones, in the absence of FEMA base flood elevation (BFE) data and floodway data, the Board will obtain, review and reasonably utilize base flood elevation and floodway data available from a Federal, State, or other source as criteria for requiring new construction, substantial improvements, or other development in Zone A as the basis for elevating residential structures to or above base flood level, for flood proofing or elevating nonresidential structures to be built to or above base flood level, and for prohibiting encroachments in floodways;

The subject site is not located within Flood Zone A. Therefore this section is not applicable.

§7.2.6.1(e) - *In the case of any proposed alteration or relocation of a watercourse, copies of the submission shall be provided to the following:*

- i. The Town Manager or Administrator in the Towns of Sudbury, Acton, Maynard, Bedford, Lincoln and Wayland*
- ii. NFIP State Coordinator, Massachusetts Department of Conservation and Recreation*
- iii. NFIP Program Specialist, Federal Emergency Management Agency;*

An alteration or relocation of a watercourse is not proposed as part of this redevelopment project. Therefore, this section is not applicable.

We trust the materials provided are sufficient for your review. In the meantime, please contact us at 508-480-9900 if you have any questions or need additional materials.

Sincerely,

BOHLER, LLC



John Kucich, PE