



**St. Paul's New Squash Center
87 Dunbarton Road, Concord, NH
Tax Map 724Z/Lot 1-10A & Map 811Z Lot 1-A**

Conditional Use Permit 28-4-3(d)

St. Paul's School requests a Conditional Use Permit to allow disturbance within the 50-foot wetland buffer for a proposed expansion of its Athletic and Fitness Center (AFC). The project includes a building addition, construction of an access road to provide secondary egress, and stormwater management improvements. On November 6, 2024, the applicant received a variance (ZBA 0230-2024) from the Zoning Board of Adjustment for *Section 28-4-3(c)(1) wetland buffers and setbacks – certain uses prohibited in buffers*, to allow construction of a building or structure in 8,200 square feet of wetland buffer where construction of a building in a wetland buffer is prohibited. Since that approval, the building footprint has been revised, and the updated design now results in 3,220 square feet of building disturbance within the 50-foot wetland buffer. In addition to the building footprint, the project proposes further disturbance for site clearing, grading related to stormwater improvements, and construction of the access drive. The total area of disturbance for this project within the 50-foot buffer is now 8,320 square feet, of which 5,235 square feet will be permanently covered by impervious surfaces. It should be noted that there is existing impervious coverage within the 50-foot setback that will remain unchanged as part of this project.

Conditional Use Additional Information

In order to effectively develop the property, the project requires the following Conditional Use Permits:

1. CUP per Article 28-4-3(d) Conditional Use Permit Required for Disturbance to a Wetland Buffer

In support of the Conditional Use Permit Applications, we offer the following supporting information:

- **The use is specifically authorized in this ordinance as conditional use.**
Section 28-4-3(d) Disturbance to a Wetland Buffer states that the Planning Board may grant a conditional use permit allowing the disturbance of a buffer in conjunction with construction or installation of roads, utilities, and drainage improvements and other uses which require the placement of impervious surfaces, and the draining, dredging, filling, recontouring, or grading of the land within the buffer. In granting a permit, the Planning Board may attach conditions to the permit including, but not limited to, requirements for more extensive buffers, additional plantings in areas to be revegetated, and a reduction in the extent of impervious surfaces within the buffer.



- **If completed as proposed by the applicant, the development in its proposed location will comply with all requirements of this Article, and with the specific conditions or standards established in this ordinance for the particular use;**

In addition to the requirements of Section 28-9-4(b), Conditional Use Permits, of this ordinance, an applicant for a permit shall provide adequate documentation in order for the Planning Board to make a finding that the proposed disturbance of the buffer meets the following conditions:

1. The disturbance of the buffer is necessary to the establishment of an allowable principal or accessory use on the buildable land area of the lot.
 - The disturbance within the buffer is to maintain an access road for St. Paul's facility and maintenance vehicles to the Matthes Cage Building at the AFC as well as associated stormwater management improvements. This access road serves as a secondary egress to the AFC building and will replace the existing access road. The stormwater management improvements will help mitigate additional runoff caused by the project. These disturbances are necessary to maintain the secondary egress and avoid any additional impacts to the wetland buffer.
2. The proposed disturbance to the buffer cannot practicably be located otherwise on the lot to eliminate or reduce the impact to the buffer and represents the minimum extent of the disturbance necessary to achieve the reasonable use of those portions of the lot consisting of buildable land.
 - The site is unique in that a wetland complex is located along the entirety of the south and eastern sides of the project area with an unnamed brook that runs parallel to the existing AFC building, and the Turkey River located approximately 300 feet east of the site. There is no other location for the building addition's associated access road and stormwater management systems that would result in less disturbance.
3. The proposed disturbance to the buffer minimizes the environmental impact to the abutting wetland, and downstream property and hydrologically connected water and wetland resources.
 - The disturbance minimizes the environmental impact to the wetlands by incorporating stormwater improvements to reduce the post-development peak flows and volume to the wetland area.
4. Where applicable, wetland permit(s) have been received or are obtained from the NHDES and USACOE.
 - Wetland permit(s) are not required from NHDES or USACOE for this project as there will be no disturbance to the wetland area as a result of this project.



5. Where applicable, permits or proof of compliance with all other state and/or federal regulations have been received or are obtained.

- There is an existing variance, ZBA-0230-2024, that was received on November 6, 2024.

- **The use will not materially endanger the public health or safety;**

The proposed disturbance to the wetland buffer will not materially endanger the public health or safety. The development will improve stormwater management and reduce runoff and enhance water quality, thereby protecting downstream ecosystems and public water supplies. Additionally, the new access road layout will continue to provide secondary egress to the AFC building in case of an emergency.

- **The use will be compatible with the neighborhood and with adjoining or abutting uses in the area in which it is to be located**

The proposed project is within the Institutional District (IS). This project is an expansion to the Athletic & Fitness Center to provide students at St. Paul's School with a state-of-the-art Squash Courts. The project site is within the core of the schools campus and is compatible with the neighborhood and adjoining uses.

- **The use will not have an adverse effect on highway or pedestrian safety**

Disturbance to the wetland buffer will have no adverse effect on highway or pedestrian safety.

- **The use will not have an adverse effect on the natural, environmental, and historic uses of the city**

The project will not have an adverse effect on the natural, environmental, and historic uses of the city. The proposed development will improve existing conditions, benefiting the environment. Attached is a wetland functional assessment report for reference.

- **The use will be adequately serviced by necessary public utilities and by community facilities and services of a sufficient capacity to ensure the proper operation of the proposed use and will not necessitate excessive public expenditures to provide facilities and services with sufficient additional capacity.**

The AFC is currently is serviced by municipal sewer and water, as well as private electric, natural gas, and telecommunications. The utilities have sufficient capacity to support this development.

CONDITINAL USE PERMIT APPLICATION CHECKLIST

Project Name: SPS Squash

Date: 9/17/2025

SECTION 12 General Requirements for All drawings

12.02 All Applications:

- ☐ (1) *Title Block:*
- ☐ (a) Title of plan;
- ☐ (b) Name and address of the owner and applicant;
- ☐ (c) The date the plan was prepared and date of subsequent revisions; and
- ☐ (d) Name, address and seal of the licensed professionals who prepared the plan.
- ☐ (2) *Scale.*
- ☐ (3) *North Arrow and Bar Scale* except for detail drawings.

all items are provided on full
civil plan set that was
submitted for Major Site Plan
application.

12.03 Plan Certification:

- ☐ (1) A New Hampshire Licensed Land Surveyor shall prepare, sign and seal the existing condition plan.
- ☐ (2) A New Hampshire Licensed Professional Engineer shall prepare, sign and seal all plans where grading, drainage and utility information is proposed.
- ☐ (3) Landscape plans shall be prepared by a New Hampshire Licensed Landscape Architect who shall sign and seal the landscape plan(s).
- ☐ (4) Architectural elevations shall be signed or sealed by a New Hampshire Licensed Architect, or a New Hampshire Licensed Professional Engineer, as allowed by the State of New Hampshire professional licensing boards.
- ☐ (5) Where wetland boundaries are required to be delineated, the delineation shall be performed by a New Hampshire Certified Wetland Scientist who shall sign and seal the plan upon which the wetland boundaries are mapped.
- ☐ (6) Where soils are required to be identified, classified, and delineated, the identification, classification, and delineation shall be performed by a New Hampshire Certified Soil Scientist who shall sign and seal the plan upon which the soils are mapped.

12.04 Location Plan: Each site plan application shall have on the site plan, or a cover sheet, a detailed location plan prepared at a minimum scale of 1"= 400' showing clearly the following information:

- ☐ (1) Proposed property to be developed;
- ☐ (2) Property lines;
- ☐ (3) Abutter's property lines;
- ☐ (4) Names and locations of nearby and adjacent City streets;
- ☐ (5) Names and locations of adjacent water bodies and watercourses;
- ☐ (6) Names and locations of nearby and adjacent parks, schools, churches, and other significant physical and man made features;
- ☐ (7) Nearest street intersections;
- ☐ (8) The tax assessor's map, block and lot number for abutters and the properties to be developed;
- ☐ (9) Zoning district designations and boundaries; and
- ☐ (10) Other special information which may be required by the Planning Board.

12.05 Vicinity Plan: Each site plan shall have on the site plan or the cover sheet a vicinity plan prepared at a scale between 1"=1000' and 1"=2000' clearly showing the following:

- ☐ (1) The location of the property to be developed; and,
- ☐ (2) Streets, water bodies, city limits, parks, schools, and other significant physical and man-made features.

12.06 Plan References: The following references shall be included on the site plan and existing condition plan:

- (1) *Certificate of Ownership:* A certificate of ownership identifying each parcel, including which property is owned by each owner, and a deed citation for each deed from the Merrimack County Registry of Deeds;
 - (2) *Easements:* Plan or deed references for recorded easements, whether public or private, on the properties proposed for development; and existing easements on abutting properties, which are for the purposes of providing access, utilities or drainage to the properties proposed to be developed;
 - (3) *Existing Restrictions:* Deed reference and statement of any existing recorded covenants or restrictions relating to the use of the land proposed to be developed;
 - (4) *Prior Subdivisions or Surveys:* Plan references for prior recorded subdivisions or surveys on the properties proposed for development, or abutting said properties proposed to be development; and
 - (5) *Other Plans:* Plan references for applicable road, utility or site improvement plans, which are available in City records or are available to the surveyor or engineer preparing the plans.
- **12.07 Wetland Delineations:** Wetland delineations are to be prepared by a New Hampshire Certified Wetland Scientist who shall sign and seal the existing condition plan and site plan. The date of the wetland delineation shall be noted on the plans.
- **12.09 As-Built Drawings:** Prior to the issuance of a Certificate of Occupancy digital as-built drawings shall be provided conforming to the City Engineering Division's As-Built checklist.

SECTION 13 General Requirements for Documentation

13.01 All Applications: The following information is required for all site plan applications except for Preliminary Conceptual Consultation Phase:

- (1) *Authorization of the Property Owner:* The applicant for site plan review must either own the fee simple interest in the property(s) that is the subject of the review or have written permission of the fee simple owner. All applications shall include written evidence that the fee simple owner of the property has authorized the application and does not object to the application being made. Evidence shall include either the owner's signature on the application or a letter signed by the owner authorizing the submittal of the application.
- (2) *Application Form:* A completed application form endorsed by the owner, or submitted by his agent where written authorization has been provided by the owner. A copy of the owner's written authorization needs to be attached to those applications signed by the agent.
- (3) *Application Fee:* An application fee as set forth in Appendix A, Fees, which are due and payable upon submission or prior to the recording of any documents or plans.
- (4) *Abutters List:* An abutters list including a list of names and addresses of all abutters as indicated in the records of the City Tax Assessor not more than five (5) days before the filing of the application.
- (5) *Zoning Board of Adjustment Actions:* A copy of any actions by the Zoning Board of Adjustment on requests for special exceptions or variances from the City of Concord Zoning Ordinance.
- (6) *State and Federal Permits:* A copy of any application made to a State or Federal agency required for the approval of this site plan, including those required for the development of off-site improvements.
- (7) *Phasing Plan:* A statement describing the proposed phasing of the site plan including the time frame, percentage of total residential and non-residential uses, and the improvements and facilities provided in each phase.
- (9) *Special Investigative Studies or Third Party Reviews:* Special Investigative Studies pursuant to RSA 676:4 I(g), or Third Party Review pursuant to RSA 676:4-b for all or a portion of a site plan application, or impact study, shall be provided where required in accordance with Section 31, Special Investigative Studies – Third Party Review, of these regulations, or as may be specifically required by the Planning Board in order to satisfactorily complete its review of a proposed application.

SECTION 15 Application Requirements for Conditional Use Permit plans

34.01 General.

- (1) A narrative addressing the criteria set forth in the Zoning Ordinance for the Conditional Use Permit(s) requested, and the general criteria for the issuance of Conditional Use Permits in Article 28-9-4(b);
- (2) All items set forth in Section 14.02, Design Review Phase Requirements;

14.02 Design Review Phase Requirements.

(1) Site Analysis Plan shall show:

- (a) Natural Features: The following information both on and adjacent to the site to be subdivided:
 - i. Identification of wetlands and wetland buffers;
 - ii. Vegetation survey showing fields, swamplands, wetlands, grasses, shrubs and trees (deciduous and evergreen);
 - iii. Rock outcrops, ledges, surface water, streams, seasonal or permanent water bodies or water courses including any known flood elevations, as well as identification of high water marks;
 - iv. Important views of and from the site;
 - v. Orientation to the sun and direction of prevailing winds;
 - vi. Contour lines at a minimum of two (2) foot intervals with ten (10) foot contour intervals highlighted;
 - vii. Slopes in excess of fifteen percent (15%) and in excess of twenty five percent (25%);
 - viii. Identification of bluffs and buffers to bluffs;
 - ix. Identification and classification of the extent and types of soils using the USDA Natural Resource Conservation Service System;
 - x. Wellhead protection areas;
 - xi. Wetland Delineation;
 - xii. Wetland buffers; and
- (b) Man-made Features: The following items, both on and adjacent to the site to be developed, are required to be shown at a minimum, but are not exclusive:
 - i. Location of utilities including any specific rights-of-way; the size of sanitary sewers; water mains, storm sewers, including surface and subsurface drainage systems; and non-municipal utilities including overhead transmission lines;
 - ii. Identification of municipal special district boundaries;
 - iii. Location and purpose or use of building and structures;
 - iv. Location of walls, fences and wells;
 - v. Location of existing conservation and open space easements, and easements for utilities, storm drainage, slopes, vehicular and pedestrian access;
 - vi. Public streets and highways and mapped future streets as defined on the Official Map;
 - vii. Railroad tracks and rights-of-way, and airport approach zones;
 - viii. Driveways, curb cuts, and parking lots;
 - ix. Any historic structures or sites listed or eligible for the National or State Registers of Historic Places, and any historic markers;
 - x. Any cemeteries, stone walls or foundations, or known archeological sites; and
 - xi. Public and private recreation areas, parks and open space.
- (c) Proposed highways or other major public improvements planned by public authorities for future construction on or in proximity to the site;
- (d) Planned private improvements on or in proximity to the site, including any previously approved subdivision or adjacent site plan;
- (e) Any other significant man-made or natural features which have relevance to the development of the site; and
- (f) Photographs of the site showing existing features and conditions. Notes shall be made of camera locations, direction, view, and key numbers.

(2) Proposed Site Layout Plan: A proposed site layout plan shall show:

- (a) The approximate location, number, and type of parking spaces, the location of loading areas, interior landscaping, access aisles and storage or display areas for motor vehicles;
- (b) The approximate location of pedestrian and/or bicycle facilities including those along the frontage of the property;
- (c) All driveway and access locations including approximate locations of interconnected parking lots, or other shared access;
- (d) The approximate location and size of buildings and structures;

- (e) The location of perimeter yards, buffer yards and fences, and other landscape or open space areas;
- (f) Tabulations of the gross land area and buildable land area, approximate lot coverage of buildings and impervious surfaces, parking lot area including aisles and driveways, required open space, number of dwelling units, residential density, square footage of non-residential uses, and ; and
- (g) Any proposed impacts to wetlands and bluffs, buffers to bluffs and wetlands, Shoreland Protection (SP) District buffers, and Aquifer Protection Areas.

(3) Site Utility and Drainage Layout Plan: A site utility and drainage layout plan shall show the following:

- (a) The location of existing sanitary sewers and/or septic systems, water mains and/or potable wells, culverts, and existing utility poles;
 - (b) Existing utility rights-of-way;
 - (c) Existing drainage facilities and the approximate layout of all proposed storm drainage facilities, including detention and retention ponds and drainage swales;
 - (d) Preliminary proposals for connection with existing water supply and sanitary sewage systems or alternative means of providing water supply and sanitary waste treatment and disposal; and
 - (e) Existing non-municipal utilities on, or adjacent to the site, and the approximate layout of non-municipal utilities proposed.
- **(4) Other Requirements:** The Board may require further detailing of information and additional meetings, before advising the applicant to proceed with a formal application for a major site plan.

Wetland Functional Assessment

St. Paul's School Squash Court Addition

**Tax Map 72AZ/Lot 1-12
87 Dunbarton Road
Concord, NH**

October 2, 2024

DEC Project No. 24-0178

Prepared For: St. Paul's School
325 Pleasant Street
Concord, NH 03301

Prepared By: Danforth Environmental Consulting, LLC.
654 New Boston Road
Frankestown, NH 03043
(603) 547-7100

Wetland Functions and Values Assessment

This wetland functional assessment report has been prepared as part of anticipated applications to the City of Concord for the expansion of an existing building into the 50-foot wetland buffer. The project site is located on the Saint Paul's School Campus at 87 Dunbarton Road and identified as Tax Map 72AZ/Lot 1-12. The school is proposing to construct an 18,800 s.f. addition to the existing athletic facility to accommodate squash courts and related facilities.

A wetland scientist conducted the onsite delineation of the jurisdictional wetlands that include a forested wetland and an intermittent stream that drains east to the Turkey River. This functional assessment addresses the wetlands within the project area with particular attention to the stream and the narrow wetland associated with it. There are no direct impacts proposed to the wetland or the stream but 8,200 s.f. of the 50-foot wetland buffer will be impacted. According to GranitView and the NH Fish & Game Natural Heritage Inventory, there are no Priority Resource Areas, exemplary natural resources, or threatened or endangered wildlife species present in or near the project area.

This wetland functional evaluation has been prepared using the Army Corps Highway Methodology Workbook-Supplement. To address Ecological Integrity, the New Hampshire Method was utilized to assess this function. The following reference documents were used in addition to onsite field inspections to develop this functional evaluation and assessment.

- UNH GranitView GIS website (<https://granitview.unh.edu/>)
- Google Earth Pro
- NH DES Wetlands Permit Planning Tool (<https://nhdeswppt.unh.edu/>)
- Nobis Group Conceptual Site Plan, September 27, 2021
- NH F&G Wildlife Action Plan (Rev. 2015)
- NRCS Web Soil Survey for Merrimack & Belknap Counties, NH
- US Army Corps of Engineers- The Highway Methodology Workbook – Supplement.
- NH Method, UNH Cooperative Extension, 2023

Project Site Characterization

The original building is located on the south side of Dunbarton Road on the St. Paul's School Campus. The new 18,800 s.f. addition is proposed on the south side of the building and abuts an existing stream and forested wetland to the south. The intermittent stream connects a forested wetland on the west and the Turkey River drainage to the east. The Turkey River is a protected river under the Shoreland Water Quality Protection Act (SWQPA- RSA 483-B).

The project area includes landscaped areas, lawn and an access road for maintenance vehicles. The developed area is bordered by an upland forest of mature red and white oaks, basswood, white pine, and eastern hemlock. The understory consists of red maple,

yellow birch, black birch, American elm, American beech, and eastern hemlock. Ironwood, witch-hazel, American beech and eastern hemlock comprise the shrub/sapling layer. Herbaceous cover in the upland and wetland transition consists mostly of cinnamon fern, sensitive fern, New York fern, Christmas fern, jewelweed, and invasive species that include Japanese barberry, Oriental Bittersweet, and Japanese Knotweed. The upland-wetland transition follows a break in slope that parallels the banks of the intermittent stream. The intermittent stream channel is narrow and well defined. The steeper grade to the east has resulted in a highly entrenched streambed with large boulders exposed. The upper reach of the stream becomes broader, as it transitions to the forested wetland, and is less entrenched. South of the stream and associated wetland is a mature upland forest bordered by the Turkey River system on the east, and I-89, Silk Farm Road, and Builders Sq. on the south and west.

The NRCS web soil survey indicates a Chatfield-Montauk-Hollis soil complex (250B) that is derived from coarse-loamy melt-out till that is well drained, moderately shallow to bedrock, with many surface cobbles, stones, and boulders.

Wetland Functional Assessment Criteria

Wetland functions and their significance were evaluated using the US Army Corps Highway Methodology guidelines. A Wetland Functional Assessment form and a list of criteria for each wetland function used in the assessment are included in this report. The form helps to develop a qualitative assessment of a wetland for each of the 14 wetland functions and values. The following is a list of the 14 wetland functions and values with a brief description for each. Ecological Integrity has been added as an additional assessment function using the NH Method protocol.

1. (1&2) **Groundwater recharge/discharge:** This function considers the potential for a wetland to serve as a groundwater recharge and/or discharge area. Recharge should relate to the potential for the wetland to contribute water to an aquifer. Discharge should relate to the potential for the wetland to serve as an area where ground water can be discharged to the surface.
2. **Floodflow Alteration:** This function considers the effectiveness of the wetland in reducing flood damage by attenuation of floodwaters for prolonged periods following precipitation events.
3. **Fish and Shellfish Habitat:** This function considers the effectiveness of seasonal or permanent water bodies associated with the wetland in question for fish and shell fish habitat.
4. **Sediment/Toxicant/Pathogen Retention:** This function reduces or prevents degradation of water quality. It relates to the effectiveness of the wetland as a trap for sediments, toxicants or pathogens.

5. **Nutrient Removal/Retention/Transformation:** This function relates to the effectiveness of the wetland to prevent adverse effects of excess nutrients entering aquifers or surface waters such as ponds, lakes, streams, rivers or estuaries.
6. **Production Export:** This function relates to the effectiveness of the wetland to produce food or usable products for human, or other living organisms.
7. **Sediment/Shoreline Stabilization:** This function relates to the effectiveness of a wetland to stabilize stream banks and shorelines against erosion.
8. **Wildlife Habitat:** This function considers the effectiveness of the wetland to provide habitat for various types and populations of animals typically associated with wetlands and the wetland edge. Both resident and or migrating species must be considered.
9. **Recreation:** This value considers the effectiveness of the wetland and associated watercourses to provide recreational opportunities such as canoeing, boating, fishing, hunting and other active or passive recreational activities. Consumptive opportunities consume or diminish the plants, animals or other resources that are intrinsic to the wetland, whereas non-consumptive opportunities do not.
10. **Educational/Scientific Value:** This value considers the effectiveness of the wetland as a site for an "outdoor classroom" or as a location for scientific study or research.
11. **Uniqueness/Heritage:** This value relates to the effectiveness of the wetland or its associated water bodies to produce certain special values. Special values may include such things as archeological sites, unusual aesthetic quality, historical events, or unique plants, animals, or geological features.
12. **Visual Quality/Aesthetics:** This value relates to the visual and aesthetic qualities of the wetland.
13. **Threatened or Endangered Species Habitat:** This value relates to the effectiveness of the wetland or associated water bodies to support threatened or endangered species.
14. **Ecological Integrity:** This is an assessment of the ability of a wetland system to sustain its ecological structure, composition and function unimpaired by anthropogenic influences.

Project Area Wetland Functional Assessment

Principle wetland functions and values supported by the intermittent stream and forested wetland resource area on this project site includes **Sediment & Shoreline Stabilization, Education/Scientific Value**. The wetland is a narrow intermittent

SPS-Athletic Facility Expansion

87 Dunbarton Road

Concord, NH

stream corridor that connects a forested headwater wetland with the Turkey River system. The proposed project is adjacent to the stream and will encroach into the 50-foot wetland buffer but will have no direct impact on the stream and associated wetland. Areas within the 50-foot buffer include an undisturbed forested area that varies in depth between 30 and 90 feet. Beyond the tree line, towards the athletic facility, is maintained lawn, a paved driveway, sidewalk, and parking lots. The new addition is proposed within 10 feet of the wetland edge and impacts approximately 8,200 s.f. of the wetland buffer.

This functional assessment has identified 1 Principal function and 1 Principal value that the wetland supports. The potential impact to the associated uplands is evaluated based on the principal functions and values determined to be significant for this wetland.

Sediment & Shoreline Stabilization

Sediment & Shoreline Stabilization is a principal function supported by the wetland. The stream channel is well defined and entrenched in the steeper gradient with a narrow associated forested wetland that provides bank stability through the root structure of adjacent trees and the abundant stones, cobbles, and boulders present on the surface and within the stream channel. In the upper reach of the stream (to the west) where the stream channel slope is less steep, the channel and associated wetland widens and is more diffuse and less entrenched. Occasional high flow conditions occur that overtop the banks as evidenced by sediment deposition on the banks (see Photo#3). The associated wetland and root structure of existing vegetation and abundance of natural hard armoring maintains the stream channel integrity for the short distance between the forested wetland and the Turkey River riverine system.

Education/Scientific Value

The interspersed of uplands, wetlands, streams, rivers and associated floodplains in close proximity of this project site make this stream valuable for education or research. The site is convenient and readily accessible to the St. Paul's Campus where the field study of multiple wetland classes can be safely accessed and conducted within a relatively small area.

Discussion

The principal functions supported by the wetland adjacent to the project is Sediment & Shoreline Stabilization and Educational Value. Construction of this project will require an encroachment to within 10 feet of the wetland and impacting approximately 8,200 s.f. of the wetland buffer that currently includes forested upland, asphalt driveway and maintained lawn. The resulting alteration within the 50-foot buffer would not impact the principal wetland function of sediment and shoreline stabilization if Best Management Practices and sound measures are implemented as part of the development plan that restricts surface runoff to the remaining wetland buffer. Management and treatment of stormwater runoff from the site must be directed to an area where controlled release can be accomplished without compromising the integrity of the stream channel and potentially causing accelerated erosion. Locating the building addition to the east or west would expose more sensitive and higher functioning wetlands, which are best avoided. To the east, the stream discharges to the Turkey River that contains floodplain wetlands and is also protected by a 250-foot buffer under the NH Shoreland Protection Act (SWQPA). Steep slopes to the wetland also make this area more sensitive to

sedimentation from erosion over steep slopes. The wetlands to the west are a large, forested complex abutting the parking lot. Redevelopment of this area from parking to building expansion would displace necessary and existing parking to another location, creating additional disturbance. Encroachment into the wetland buffer would not have a detrimental impact on the Educational/Research Value provided access is maintained to the wetlands and stream system. This value considers the wetland complex as a whole and proximity to other wetland resource areas nearby.

Conclusions & Recommendations

The siting of the proposed expansion project minimizes overall impacts to the wetland resource area and associated 50-foot buffer. Location of the addition elsewhere on the site will not likely result in less impacts over what is proposed. No direct impacts to the subject wetland resource area is proposed. A proper drainage and water quality treatment system will mitigate any potential loss of wetland function or value.

Additional plantings to augment the remaining buffer and effective slope stabilization measures implemented to stabilize the site will ensure resource area impacts are avoided. In addition to implementing a planting plan, eradication of existing invasive species should also be considered a priority to protect the naturally vegetated wetlands.



Photo #1: Intermittent stream at the eastern extent of the project area looking west (upstream).



Photo #2: Looking northerly from the stream channel at WF7-21 and associated wetland buffer area



Photo #3: Overbank flows along south side of stream is representative of stream bank stability.

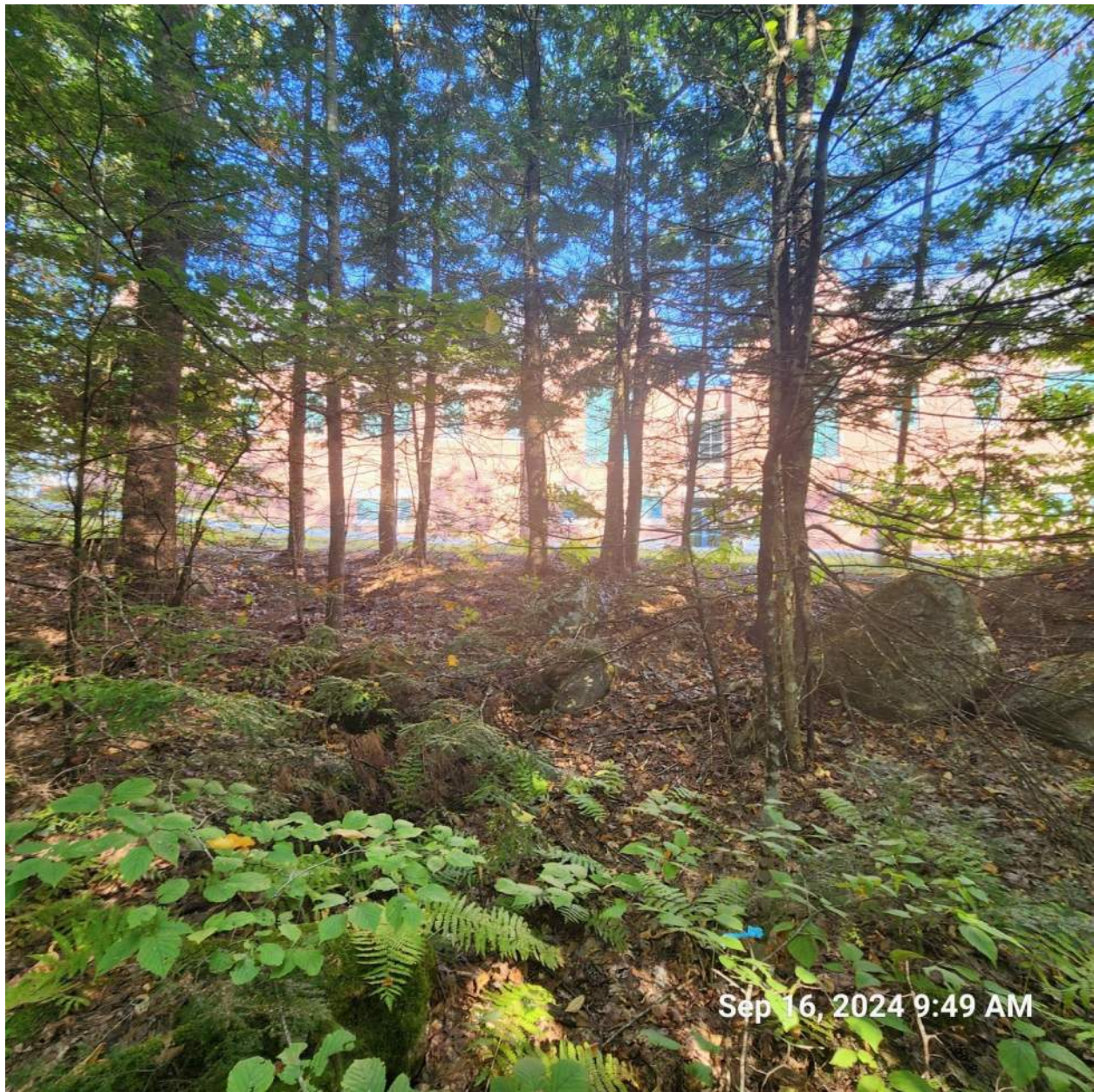


Photo #4: Upland buffer between WF 7-24 and the area of development (looking northerly).



Photo #5: Looking west at transition of stream channel to forested wetland near WF 7-27,



Photo #6: Looking west at proposed project location between the building and treeline.

Wetland Function-Value Evaluation Form

Total area of wetland >5 ac Human made? NO Is wetland part of a wildlife corridor? NO or a "habitat island"? YES

Adjacent land use ATHLETIC FACILITY/PARKING/CAMPUS Distance to nearest roadway or other development 30'

Dominant wetland systems present Intermittent stream Contiguous undeveloped buffer zone present NO

Is the wetland a separate hydraulic system? NO If not, where does the wetland lie in the drainage basin? below headwater wetland

How many tributaries contribute to the wetland? none Wildlife & vegetation diversity/abundance (see attached list)

Wetland I.D. Intermittent Stream

Latitude 43.190189 Longitude 71.575045

Prepared by: CKD Date 9/16/2024

Wetland Impact:
Type Buffer Area _____

Evaluation based on:
Office XX Field XX

Corps manual wetland delineation
completed? Y XX N _____

Function/Value	Suitability Y / N	Rationale (Reference #)*	Principal Function(s)/Value(s)	Comments
 Groundwater Recharge/Discharge	N	1,2,3,4,5,6,7,15	N	The intermittent stream is a headwater stream that flows to the Turkey River
 Floodflow Alteration	N	2,4,5,7,9,11	N	This intermittent stream has minimal storm-flow retention capacity
 Fish and Shellfish Habitat	Y	1,2,4,8,10,11,15,17	N	This stream is a tributary to Turkey River but contains barriers to AOP
 Sediment/Toxicant Retention	N	1,2,6,10	N	This stream does not function to reduce sediment or toxicants in the water column.
 Nutrient Removal	N	4,5	N	This stream does not function to reduce or remove nutrients from surface water.
 Production Export	N	2,4,6,10,11	N	This stream may provide a source of detritus to downstream consumers
 Sediment/Shoreline Stabilization	Y	1,2,3,4,6,7,8,9,14,	Y	A narrow forested wetland is associated with the intermittent stream supporting this function.
 Wildlife Habitat	Y	5,6,7,8,19,20	N	The stream and associated wetland provides limited habitat functions
 Recreation	N	4,6,11,12	N	This intermittent stream offers minimal recreational value
 Educational/Scientific Value	Y	3,8,9,10,11,13,14	Y	This intermittent stream in conjunction with other wetland classes within the campus of SPS could be of value for environmental studies
 Uniqueness/Heritage	N	1,4,7,8,10,12,	N	Site contains no significant features to be considered unique.
 Visual Quality/Aesthetics	N	6,9	N	Wetlands are not apparent from developed portions of this site.
ES Endangered Species Habitat	N		N	According to NHB, there are no T&E species in the vicinity of this site
Other Ecological Integrity	N		N	Score is 4.9/10 due to proximity to development

Notes:

* Refer to backup list of numbered considerations.

NH METHOD FOR EVALUATING FRESHWATER WETLANDS

Wetland Name/ Code: Unnamed Intermittent Stream **Evaluation Date:** 9/16/2024 **Evaluator:** C. Danforth

ECOLOGICAL INTEGRITY

Evaluation Question	Observations & Notes	Answers	Score
Are there land uses in the wetland's watershed that could degrade water quality in the wetland?	Stream and associated wetlands are within 30 feet of pavement and building development	a. Less than 5% of the watershed has land uses that could degrade water quality. b. 5-10% of the watershed has land uses that could degrade water quality. c. >10% of the watershed has land uses that could degrade water quality.	10 5 1
Is there evidence of fill in the wetland?	Evidence of filling and encroachment into the wetlands associated with this stream is apparent	a. Less than 1% b. From 1-3% c. More than 3%	10 5 1
What percentage of the wetland has been altered by agricultural activities?	No recent impacts from agricultural activities are evident	a. Less than 5% b. From 5% to 25 % c. More than 25%	10 5 1
What percentage of the wetland has been adversely impacted by logging activities within the last 10 years?	No recent impacts to the wetland from logging activities are evident	a. Less than 1% b. From 1 to 10% c. More than 10%	10 5 1
How much human activity is taking place in the wetland (e.g. ATV use, trails, cars, dumping of brush and garbage, etc.	No recent activity observed but impacts are apparent from uncontrolled site runoff to the stream and associated wetlands	a. Low: Few trails in use, little or no traffic, and little or no litter. b. Moderate: Some used trails, roads, litter. c. High: Many trails, roads, and/ or litter	10 5 1
What percentage of the wetland is occupied by invasive plant species?	Japanese knotweed and Oriental bittersweet was observed in the project area.	a. None b. 1-5% of the wetland has invasive species. c. > 5% of the wetland has invasive species.	10 5 1
Are there roads, driveways and/ or railroads crossing or adjacent to the wetlands or come within 500-feet of the wetland?	An access drive and parking lot are located within 30 feet of the wetland and stream	a. No roads, driveways, or railroads within 500-feet of, or in the wetlands. b. Roads, driveways, railroads are within 500-feet of the wetland. c. Roads, driveways, railroads cross, or are adjacent to the wetland.	10 5 1
How much human activity is taking place in the upland within 500-feet of the wetland?	Athletic facility including athletic fields, parking, driveways, and roads are located within 500 feet.	a. Less than 5% or no activity. b. 3-10% impervious area within 500-feet of the wetland edge c. Greater than 10% impervious area within 500-feet of the wetland edge.	10 5 1
What is the percent of impervious surface within 500-feet of the wetland edge?	Estimated at 45% based on aerial imagery.	a. Less than 3% impervious area within 500-feet of the wetland edge. b. 3-10% impervious area within 500-feet of the wetland edge. c. Greater than 10% impervious area within 500-feet of the wetland edge.	10 5 1
Is there a human-made structure that regulates the flow of water through the wetland?	There are no flow control structures in the wetland in the vicinity of this project	a. No human-made structures present upstream of, or in the wetland. b. One or more human made structures present upstream of, or in the wetland but hydrologic modification in sight. c. One or more human made structures present upstream of, or in the wetland that severely block or alter surface hydrology.	10 5 1

SCORE: 1+5+10+10+5+5+1+1+1+10 = 49 49/10 = 4.9

St. Paul's School

Aerial Overview, April, 2016



Athletic and Fitness Center

Matthes Cage

Project Area

Dunbarton Rd

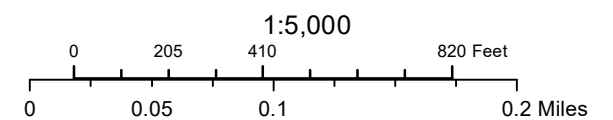
Turkey River

Turkey River

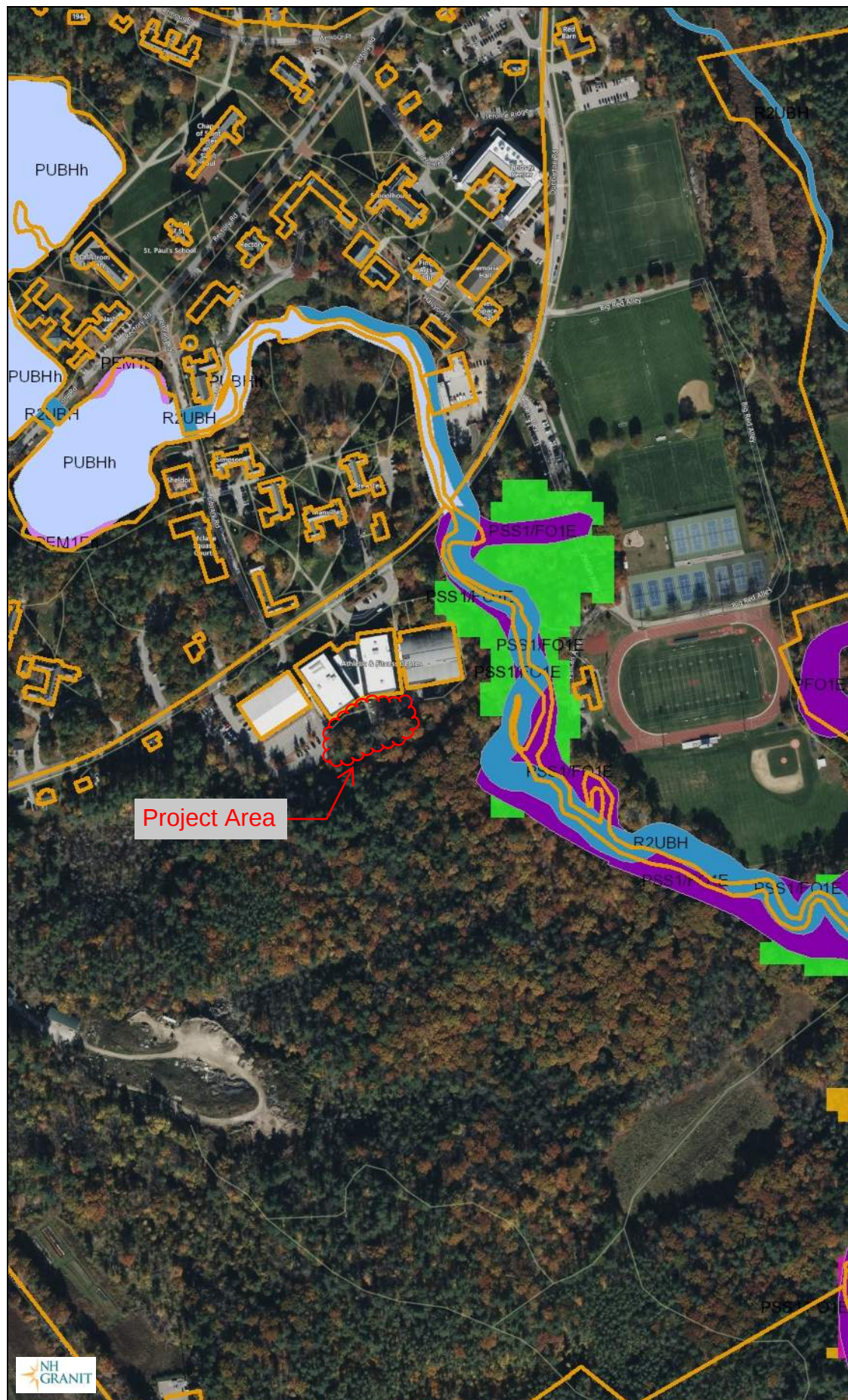




September 30, 2024



Saint Paul's School



Legend

- Parcels
- State
- County
- City/Town
- NWIPlus
 - Estuarine and Marine Deepwater
 - Estuarine and Marine Wetland
 - Freshwater Emergent Wetland
 - Freshwater Forested/Shrub Wetland
 - Freshwater Pond
 - Lake
 - Other
 - Riverine
- WAP 2020: Highest Ranked Wildlife Habitat
 - 1 Highest Ranked Habitat in NH
 - 2 Highest Ranked Habitat in Region
 - 3 Supporting Landscape

Map Scale

1: 5,000

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Map Generated: 9/30/2024

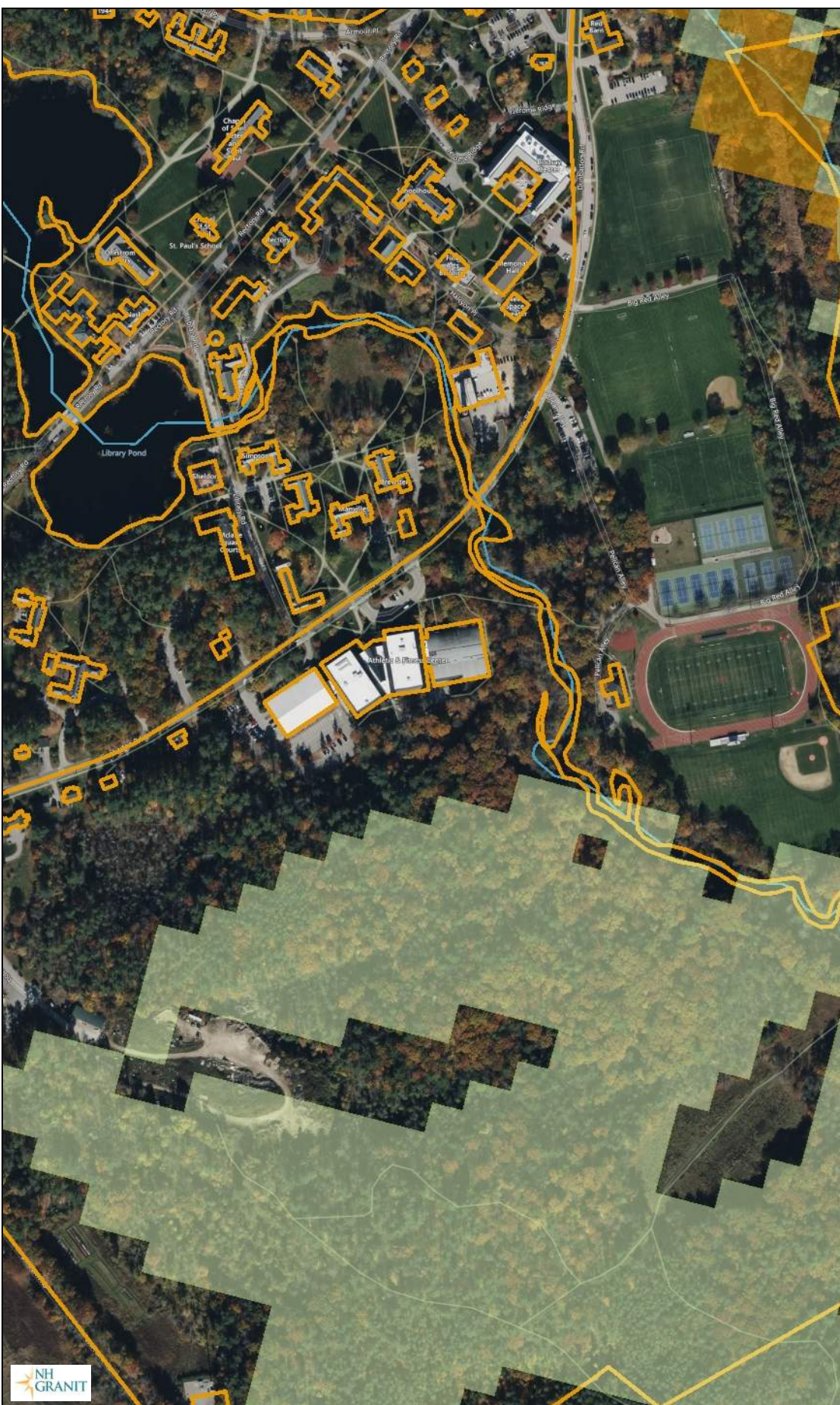


Notes

NWI-Wetland Classification and Highest Ranked Habitat



Saint Paul's School



Legend

- Wildlife Corridors
■ Wildlife Secondary Corridors
■ Parcels
— State
— County
■ City/Town
 WAP 2020: Rivers and Streams
— Coldwater
— Large Warm
— Tidal
— Warm/Cool

Map Scale

1: 5,000 

© NH GRANIT, www.granit.unh.edu

Map Generated: 9/30/2024

Notes

Wildlife Travel Corridors
Primary & Secondary Travel Corridors



New Hampshire Natural Heritage Bureau

NHB DataCheck Results Letter

To: Christopher Danforth
654 New Boston Road
Francestown, NH 03043

From: NH Natural Heritage Bureau

Date: 9/30/2024 (This letter is valid through 9/30/2025)

Re: Review by NH Natural Heritage Bureau of request dated 9/30/2024

Permit Types: CONCORD
Stormwater Pollution Prevention
Alteration of Terrain Permit

NHB ID: NHB24-2984

Applicant: Christopher Danforth

Location: Concord
Tax Map: 72AZ, Tax Lot: 1-12
Address: 325 Pleasant Street

Proj. Description: Build an addition onto the existing athletic facility. Impacts will be to the upland buffer of an intermittent stream and associated wetland.

The NH Natural Heritage database has been checked for records of rare species and exemplary natural communities near the area mapped below. The species considered include those listed as Threatened or Endangered by either the state of New Hampshire or the federal government. We currently have no recorded occurrences for sensitive species near this project area.

A negative result (no record in our database) does not mean that a sensitive species is not present. Our data can only tell you of known occurrences, based on information gathered by qualified biologists and reported to our office. However, many areas have never been surveyed, or have only been surveyed for certain species. An on-site survey would provide better information on what species and communities are indeed present.

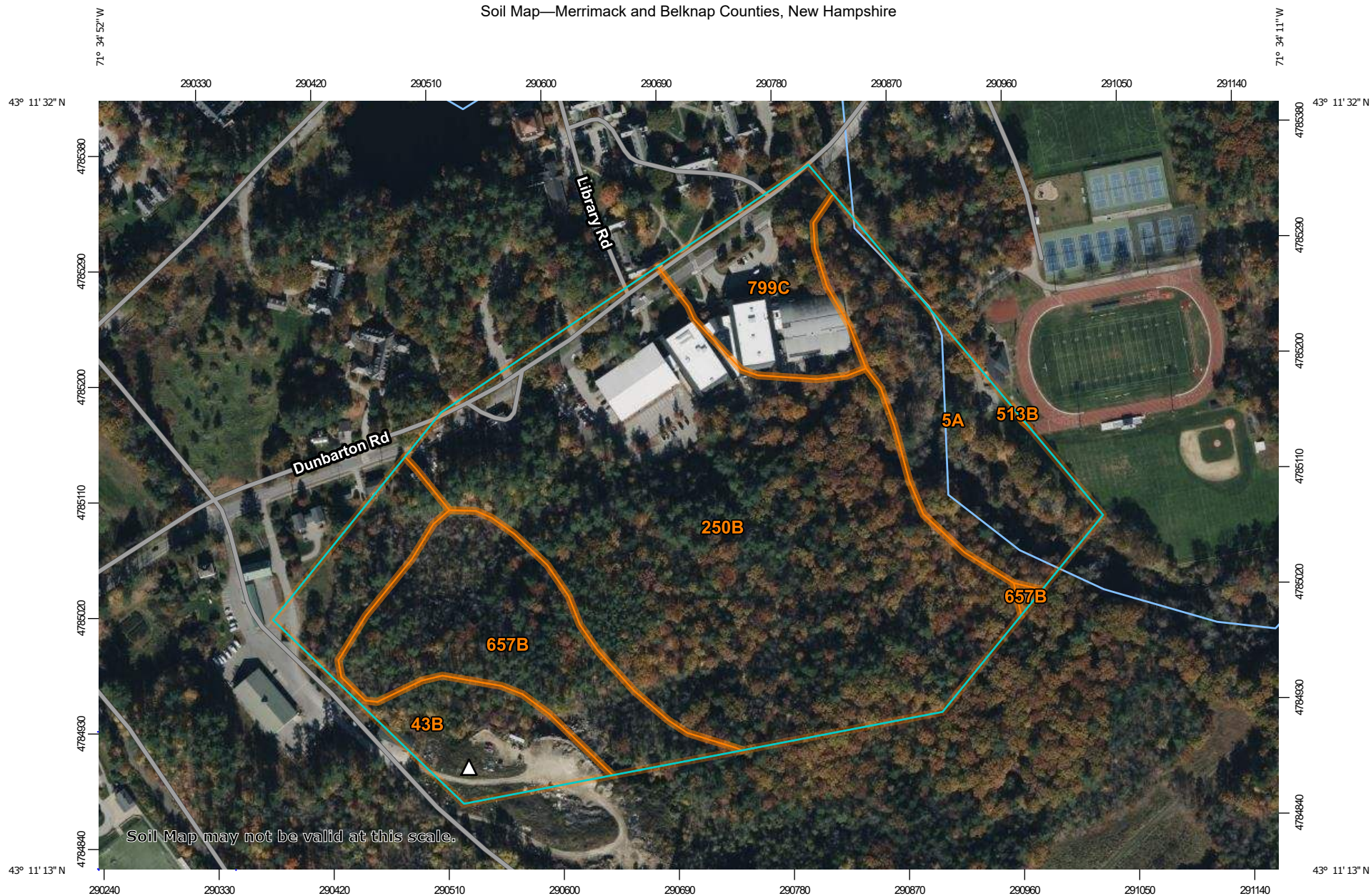
Based on the information submitted, no further consultation with the NH Fish and Game Department pursuant to Fis 1004 is required.

New Hampshire Natural Heritage Bureau
NHB DataCheck Results Letter

MAP OF PROJECT BOUNDARIES FOR: NHB24-2984

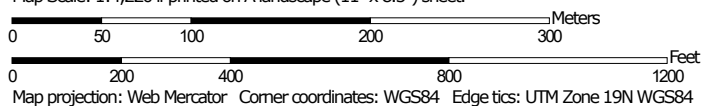


Soil Map—Merrimack and Belknap Counties, New Hampshire



Soil Map may not be valid at this scale.

Map Scale: 1:4,220 if printed on A landscape (11" x 8.5") sheet.



**Natural Resources
Conservation Service**

Web Soil Survey
National Cooperative Soil Survey

9/30/2024
Page 1 of 3

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Merrimack and Belknap Counties, New Hampshire

Survey Area Data: Version 29, Aug 22, 2023

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

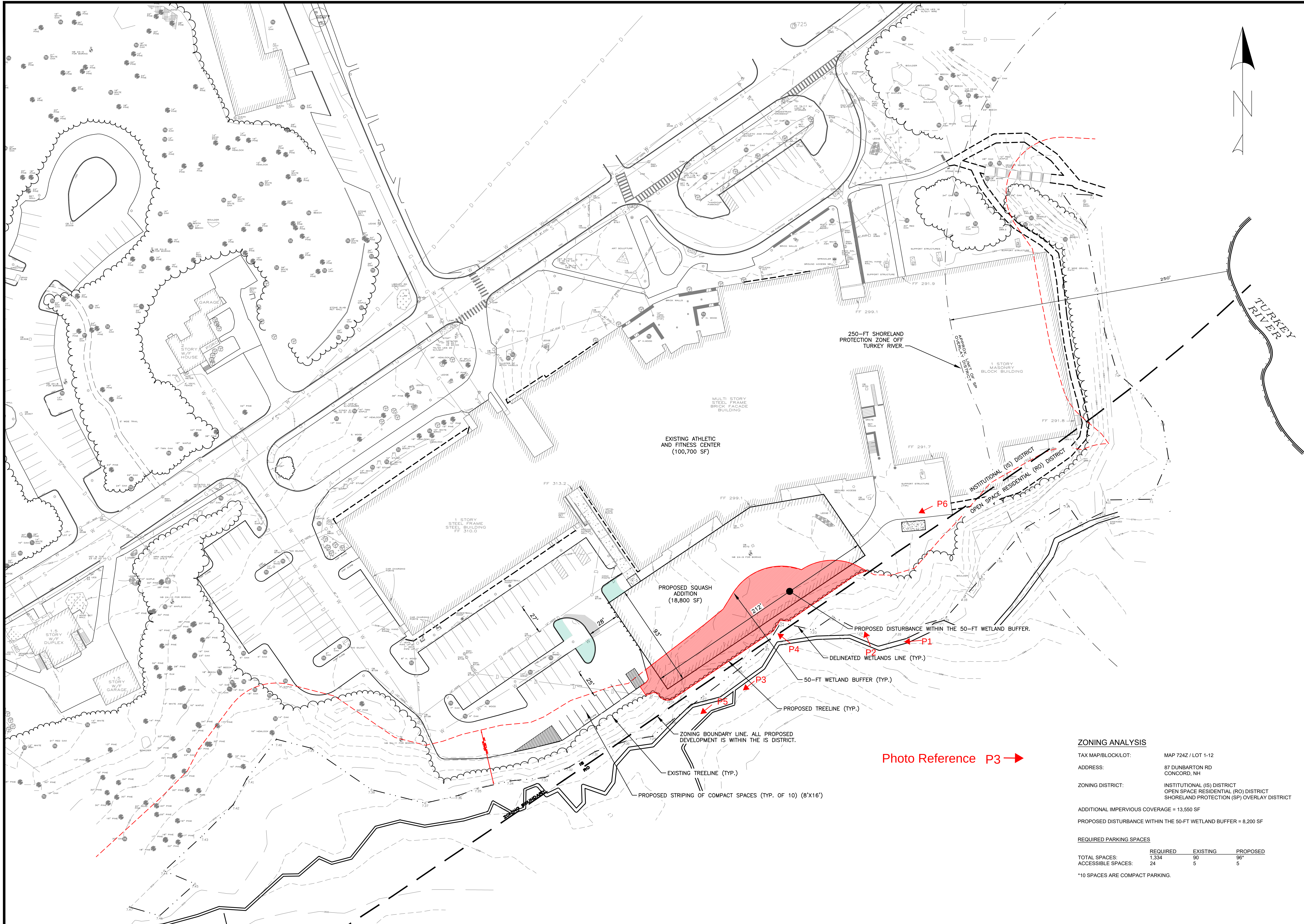
Date(s) aerial images were photographed: Oct 6, 2022—Oct 22, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
5A	Rippowam very fine sandy loam, 0 to 3 percent slopes, frequently flooded	6.3	13.6%
43B	Canton fine sandy loam, 0 to 8 percent slopes, very stony	5.0	10.8%
250B	Chatfield-Montauk-Hollis complex, 0 to 8 percent slopes, very rocky	24.7	53.7%
513B	Ninigret fine sandy loam, 0 to 3 percent slopes	0.0	0.0%
657B	Ridgebury fine sandy loam, 3 to 8 percent slopes, very stony	6.3	13.7%
799C	Urban land-Canton complex, 0 to 15 percent slopes	3.7	8.1%
Totals for Area of Interest		46.0	100.0%

J:\100811.000-St. Paul's Dining, Health & Wellness and Squash - Concept Design\CAD\DWG\100811.000-C-200-SITE.dwg 10/3/2024 9:07 AM



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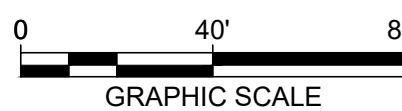
NOT ISSUED
FOR
CONSTRUCTION

ST. PAUL'S SCHOOL AFC SQUASH ADDITION

87 DUNBARTON RD
CONCORD, NH

NO.	DATE	DESCRIPTION
-----	------	-------------

REVISIONS



DATE: SEPTEMBER 27, 2024

NOBIS PROJECT NO. 100811.000

DRAWN BY: MGD

CHECKED BY: JCN

CAD DRAWING FILE:

100811.000-C-200-SITE.dwg

SHEET TITLE

CONCEPTUAL SITE PLAN OVERVIEW

SHEET

C-1

ZONING ANALYSIS

TAX MAP/BLOCK/LOT:

MAP 724Z / LOT 1-12

ADDRESS:

87 DUNBARTON RD
CONCORD, NH

ZONING DISTRICT:

INSTITUTIONAL (IS) DISTRICT
OPEN SPACE RESIDENTIAL (OR) DISTRICT
SHORELAND PROTECTION (SP) OVERLAY DISTRICT

ADDITIONAL IMPERVIOUS COVERAGE = 13,550 SF

PROPOSED DISTURBANCE WITHIN THE 50-FT WETLAND BUFFER = 8,200 SF

REQUIRED PARKING SPACES

	REQUIRED	EXISTING	PROPOSED
TOTAL SPACES:	1,334	90	96*
ACCESSIBLE SPACES:	24	5	5

*10 SPACES ARE COMPACT PARKING.



CITY OF CONCORD
New Hampshire's Main Street™
Zoning Board of Adjustment

AnneMarie Skinner, AICP
City Planner

November 8, 2024

Ari B. Pollack
Gallagher, Callahan & Gartrell, P.C.
214 N Main St
Concord, NH 03301

RE: Notice of Decision – ZBA 0230-2024

Dear Mr. Pollack:

At a meeting of the Concord Zoning Board of Adjustment, held on November 6, 2024, the Board voted on the following:

Ari Pollack with Gallagher, Callahan, & Gartrell, on behalf of St. Paul's School, requests approvals for variances from Section 28-7-2(e)(B) *Table of Off-Street Parking Requirements*, to allow 96 parking spaces where 1,334 parking spaces are required; Section 28-7-5 *Requirements for Handicapped Accessible Parking Spaces*, to allow 5 accessible parking spaces where 24 accessible parking spaces are required; and Section 28-4-3(c)(1) *Wetland Buffers and Setbacks – Certain Uses Prohibited in Buffers*, to allow construction of a building or structure in 8,200 square feet of wetland buffer where construction of a building in a wetland buffer is prohibited, at Tax Map Lot 724Z 1 and Tax Map Lot 811Z 1, generally located at 87 Dunbarton Rd, in the Institutional (IS) District and the Open Space Residential (OS) District. **(ZBA-0230-2024)**

With a vote of 5-0, the Board approved the three variance requests.

The appeal was granted for the request as submitted and approved by the Board based on information presented to the Board and oral testimony. If there is a significant change at any time in the future, you are hereby advised to discuss any proposed changes with the City Planner. If the use or construction authorized by this approval has not commenced within the two-year anniversary date of the original decision, it shall be deemed to have expired and authorization shall be considered null and void as specified in Section 28-9-3(b)(5) of the Zoning Ordinance.

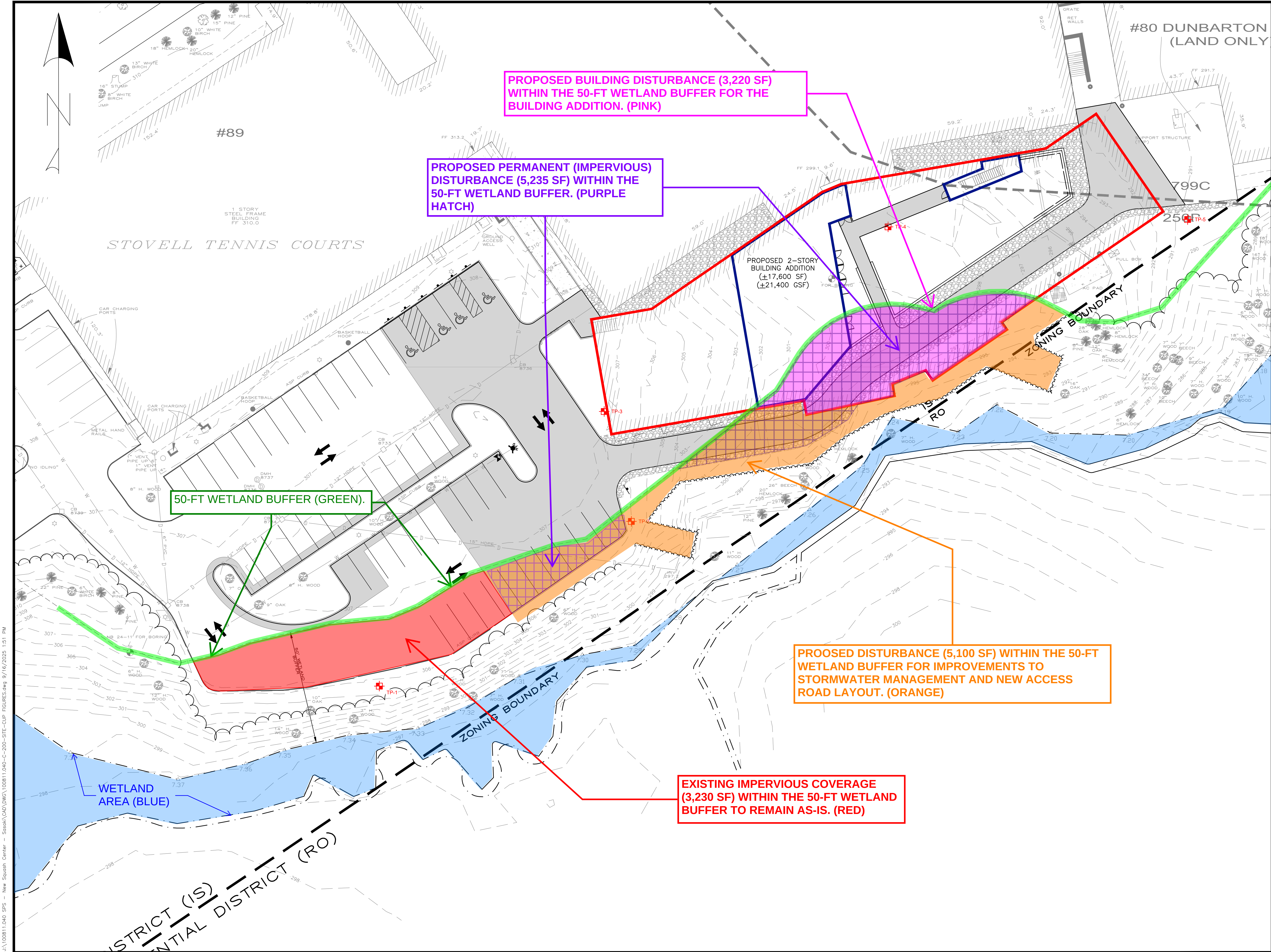
This project also requires Planning Board approval. Granting of a variance does not authorize construction or use prior to the application for and issuance of a building permit, if applicable. Written findings of fact and minutes shall be available for public inspection at the Planning Division within five business days of the vote.

If you have any questions, please contact City Planner, AnneMarie Skinner, at askinner@concordnh.gov or (603) 230-3636.

Zoning Board of Adjustment

/AMS

Planning
City Hall • 41 Green Street • Concord, NH 03301 • (603) 225-8515
planning@concordnh.gov



J:\100811.040 SPS - New Squash Center - Sasaki\CAD\DWG\100811.040-C-200-SITE-CUP FIGURES.dwg 9/16/2025 1:51 PM

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FOR
CONSTRUCTION

No.	Description	Date

DRAWING ISSUE & REVISION HISTORY

Seal

ST. PAUL'S SCHOOL
NEW SQUASH CENTER

85, 87, 89 DUNBARTON ROAD
CONCORD, NEW HAMPSHIRE

TAX MAP:
MAP 724Z/ LOT 1-10A
MAP 811Z LOT 1-A

OWNER/APPLICANT:
ST. PAUL'S SCHOOL
325 PLEASANT STREET
CONCORD, NEW HAMPSHIRE

Nobis Project No: 100811.040
Sasaki Project No: 250018.00
Drawn By: NOBIS - MGD/CMB
Checked By: NOBIS - JCN/NCP
Approved By: NOBIS - JCN
Issue Date: 09.17.2025

0 20' 40'

GRAPHIC SCALE
1 INCH = 20 FEET

SHEET TITLE

PROPOSED
WETLAND BUFFER
DISTURBANCES

EXHIBIT
B