

## APPLICATION COMPLETENESS & STAFF REVIEW COMMENTS MEMO

DATE: September 16, 2025

TO: Mark Arienti, PE, Town Engineer  
FROM: Amanda Lessard, Senior Planner/Project Manager  
Cc: Steve Puleo, Planning Director  
Windham Planning Board

RE: #25-05 Smith Cemetery Expansion – Major Site Plan – Final Plan Review – 513 Gray Road –  
Town of Windham

Requested Planning Board meeting: **September 22, 2025**

Thank you for submitting your final site plan application on September 2, 2025. The application status is **incomplete**. The staff has reviewed the application and found several outstanding item listed below under “**Final Site Plan Application Completeness**” that **must be provided by September 17, 2025** before the Planning Board final plan review is scheduled for a public hearing, in accordance with Windham Land Use Ordinance [§120-807F\(4\)](#). Your application is tentatively **scheduled for review on September 22, 2025**. The Planning Board meeting is an "in-person meeting" at the Town Council Chambers in the Town Hall located at 8 School Street. The meeting begins at 6:00pm, and your attendance is required.

Revisions from the September 10, 2025 memo appear as underlined text below.

### **Project Information:**

The Town is proposing to expand the existing 3.1-acre Smith Cemetery on to the abutting 23.95 acre parcel on Route 202. The proposed expansion will develop 1.7 acres to provide space for 298 new family plots and 800 single burials, the latter in a Veterans Niche Wall and a Columbarium Niche Wall. A 540 square foot building is also proposed for storage of landscaping maintenance equipment. The project will be accessed by a new driveway on Gray Road. Subject property is identified as Tax Map: 12, Lots: 49-1, 49-2 & Tax Map: 46, Lot: 13A Zone: Windham Center (WC) and Farm (F) in the Black Brook watershed.

Use: Cemetery.

### **Final Site Plan Application Completeness**

- [§120-811B\(1\)\(c\)](#) Written Information.
  - [\[12\]](#) Detail sheets of proposed light fixtures. *Any exterior lighting proposed on the shed and lighting for flag pole.*
- §120-811B(1)(d))[1] Plan Information. Existing Conditions.
  - [\[g\]](#) Location and dimensions of any existing easements that encumber or benefit the property. *Show the location of the access easement on the Webster-Babb property.*
- §120-811B(1)(d))[2] Plan Information. Proposed Development Activity.

- [\[g\]](#) The location, dimensions, and ground floor elevation of all proposed buildings or building expansion proposed on the site. *Provide elevation of maintenance shed.*
- [\[i\]](#) Location and type of exterior lighting. The Planning Board or Staff Review Committee may require a photometric plan to demonstrate the coverage area of all lighting.
- Submit [§120-813](#) Commercial District Design Standards [Checklist](#) and provide a narrative addressing how the portion of the project located in the WC District complies with all the required WC standards plus a minimum of eight (8) other Design Standards.

### **Staff Review Comments**

*The memo will be updated as staff comments are provided.*

### **Planning Department**

1. What is the width of the access drive within the easement? Please label on the plan.
2. Is all the grading for the access drive shown on Sheet C-105 located within the access easement?
3. What is the width of the existing cemetery road to be repaved?
4. Why is the proposed road extension from the existing cemetery only 8' wide?
5. The plan notes a "Potential gravel maintenance access and utility connection road to be approximately 8' wide. This development does not appear to be included in the analysis area of stormwater plan and no construction details have been provided related to the standards of [§120-522](#) Curb cuts and driveway openings. Please clarify if this access drive is proposed as part of this application.
6. [§120-511C\(2\)\(a\)](#) In the Farm zone, Buffer Yard H (10') is required along the property line abutting a residential use. The plants listed on Sheet L-101 do not appear to meet this standard.
  1. Note that per [§120-404](#) where a boundary line divides a parcel the regulations applicable to the less restricted portion of the lot (in the case of the buffer yard, WC) may be extended 50 feet into the more restricted portion of the lot (F).
7. [§120-511C\(3\)\(f\)](#) In the Farm zone, Buffer Yard A, B, or C is required along the frontage of Route 302. See also Table 1 Buffer Yards and [§120-511B\(4\)](#) for materials and uses allowed in buffer yard.
8. Show limits of development and the Meadow Buffer Areas on Overall site plan and Site Plan sheets.
9. Recommended CONDITIONS OF APPROVALS:
  1. Approval is dependent upon and limited to the proposals and plans contained in the application dated February 18, 2025 as amended *TBD* and supporting documents and oral representations submitted and affirmed by the applicant, and conditions, if any, imposed by the Planning Board. Any variation from such plans, proposals, supporting documents, and representations is subject to review and approval by the Planning Board or the Town Planner in accordance with [§120-815](#) of the Land Use Ordinance.
  2. In accordance with [§120-815C\(1\)\(b\)](#) of the Land Use Ordinance, the Construction of improvements covered by any site plan approval shall be completed within two years of the date upon which the performance guarantee is accepted by the Town Manager. If construction has not been completed within the specified period, the Town shall, at the

Town Manager's discretion, use the performance guarantee to either reclaim and stabilize the site or to complete the improvements as shown on the approved plan.

### **Third Party Consulting Engineer**

10. See attached Engineering Review Memorandum from Gorrill Palmer dated September 16, 2025.

As staff review comments related to compliance with any applicable review criteria become available, I will send them to you ASAP. We will need your response “**Staff Review Comments**” by September 17, 2025 or earlier to be included in the Planning Board September 22<sup>nd</sup> agenda. Thank you for your attention to these matters. Provide one copy of your response to staff comments with all revised application materials and one (1) full plan set. Email an electronic copy of your response letter, supporting documentation, and plan set. Please feel free to call me with any questions or concerns at (207) 207-894-5900 x 6121 or email me at [allessard@windhammaine.us](mailto:allessard@windhammaine.us).

## Engineering Review Memorandum

**To:** Amanda Lessard, Senior Planner/Project Manager  
**From:** Ryan Barnes, PE, Gorrill Palmer  
**Date:** September 16, 2025  
**Subject:** Major Site Plan – Final Plan Review  
**Project:** Smith Cemetery Expansion (JN 131802A)  
**Location:** 513 Gray Road  
**Applicant:** Town of Windham

Amanda,

Gorrill Palmer reviewed the following materials that were downloaded from the Applicant. We assume that you will forward our comments to the Applicant/Design Engineer or incorporate into your review comments.

1. Smith Cemetery Plan Set (containing 15 sheets), dated August 29, 2025, by Sebago Technics
2. Smith Cemetery Application, dated September 2, 2025, by the Town of Windham and Sebago Technics

We have reviewed the materials for conformance with performance standards contained in §120-812 – Performance Standards and Approval Criteria of the Town of Windham Code. We have also reviewed the materials for conformance with generally accepted civil engineering standards and offer the following comments.

### **§ 120-812 B – Vehicular Traffic**

1. The Cemetery Road Section detail on Sheet C-503 shows a crowned road section. The contours and roadway cross slopes shown on the Grading and Utility Plan 1 (Sheet C-104) reflect a superelevated road. Revise the grading or the detail to be uniform.
2. The vertical slope of the cemetery access road from Gray Road is called out at 4% and 6.25%. The contours indicate slopes as steep as 10%. We recommend adding a note indicating a maximum vertical slope for the access roadway. Please indicate if this will be gravel or paved.

### **§ 120-812 E – Stormwater Management**

3. The time-of-concentration flow path in subcatchment 1.3S crosses the existing and proposed access road. It does not appear that stormwater runoff crosses the roadway in the existing condition, and we do not recommend stormwater runoff be proposed to cross the surface of the proposed roadway. We recommend proposing a culvert at this point if stormwater runoff must cross the proposed roadway.



4. A 15-inch stormdrain is proposed adjacent to the southwestern property line of the Map 12 Lot 62 property. Provide detail/notes on how the stormdrain pipe will be installed without impacting the adjacent property.
5. The Stormwater Management Report indicates that stormwater runoff from the existing property generally flows from east to west and enters the wetlands to the west of the project. The Existing Conditions Stormwater Plan appears to indicate the opposite, with stormwater runoff generally flowing from west to east. The wetlands that the site appears to be tributary to are located to the east of the development site. Clarify the Stormwater Management Report to match the Existing Conditions and Proposed Stormwater Plans.
6. POI 1 in the post development has a large increase from pre to post development of 2.6 to 8.5 CFS, this area drains to reach 3.1 and crosses the abutting parcel. Has this increase been reviewed with the abutting property owner?
7. Add a note to the Grading and Utility Plan 1 (Sheet C-104) stating, “Meadow buffers shall be maintained as a meadow with a generally tall stand of grass, not as a lawn. The meadow buffers shall not be mown more than twice per calendar year.”, or something similar.
8. We recommend providing pins for the meadow buffer BMP area with caps that say “BUFFER” or something similar at corners/points of curvature.
9. Provide a detail of the Riprap Spillway Berm. Our understanding is the spillway berm will function as a level lip spreader.
10. It is not clear if the future columbaria will be impervious surfaces. If the columbaria are proposed to be impervious surfaces these areas should be reflected in the stormwater model.

#### **§ 120-812 F – Erosion Control**

11. Extend filter barrier lines downgradient of all areas proposed to be disturbed throughout the project.
12. The 15” stormdrain along the northerly property boundary should be reviewed for potential erosion and appropriate measures taken to prevent erosion between the pipe outlet and meadow buffer.

#### **§ 120-812 J – Groundwater Protection**

13. Water supply for landscaping and maintenance activities will be provided by a new service off the public water main located in Roosevelt Trail (Route 302). No sewer or septic facilities are proposed as part of this project. It appears the development will not adversely impact either the quality or quantity of groundwater at or around the site.

#### **§ 120-812 K – Water Quality**

14. The proposed use of the development is a cemetery expansion. This use is not anticipated to create a discharge of any treated, untreated, or inadequately treated liquid, gaseous, or solid materials which may impact the water quality within or surrounding the site.

**General**

15. Provide a typical roadway reconstruction detail in accordance with Chapter 204 – Streets and Sidewalks of the Town Code for the utility work within the Roosevelt Trail right-of-way.
16. On Sheet C-104, Roosevelt Trail is labeled as Route 202 not Route 302. Revise accordingly.
17. It appears that the proposed project site is not highlighted on the map on page 26 of the application.

Please let me know if you want to review and discuss any of the comments.

Sincerely,

Gorrill-Palmer



Ryan Barnes, PE  
Municipal Project Manager



Ben Nault, EI  
Design Engineer