



October 3, 2024  
240577

Steve Puleo, Planning Director  
Evan O'Conner, Town Planner  
Town of Windham Planning Department  
8 School Road  
Windham, ME 04062

**RE: Response to Staff Review Memorandum, Sept. 30, 2024**  
**#24-25 Major Subdivision & Site Plan – WDCJCS Subdivision**  
**Preliminary Plan Review Application; 55 High Street, MBLU: 37-24**

Dear Planning Staff and Members of the Planning Board,

On behalf of Great Falls Construction and Westbrook Development Corporation, Sebago Technics, Inc. is pleased to prepare this letter in response to staff comments in the Staff Review and Completeness Memo, dated September 30, 2024. This memorandum was prepared for the former Andrew School site redevelopment for a proposed residential senior housing project. The site is located at 55 High Street, and can further be identified on the Town Tax map 37 as Lot 24. We offer the following responses:

**Planning Department Comments:**

1. For Preliminary Plan Review, please provide agent authorization form, endorsed by the Westbrook Development Corp.

**Response: Acknowledged. Please see the attached Agent Authorization in Exhibit 1 signed by Westbrook Development Corporation.**

2. For Preliminary Plan Review, please provide an explanation on how stormwater runoff from the areas in front of the four-unit will manage the runoff. Will there be any treatment? Also, is the applicant proposing to keep the existing sidewalk along High Street and if so, will it be reconstructed to meet the Town's performance standards of §120-911.M.5.b.6.c.

**Response: The site's existing conditions have no stormwater detention or treatment. The site has a high point in the middle, so the front half of the lot currently drains towards the street to drain into the existing catch basin system in place on High Street. Most of the area currently draining to the street is impervious area. The proposed development is detaining and treating 91% of the site's impervious area and 63% of the developed area which meets/exceeds the redevelopment standards in MDEP Chapter 500 Section 4.C.2.d. Our stormwater analysis shows that our post-development peak runoff rates for all analysis points, including POA-1 (the front property line), are less than the pre-development peak runoff rate. This is because most of the front area will be grass and landscaped area, where it is currently primarily impervious area. There will be no treatment or detention for the front landscaped area and a small portion of the driveway. Please see the *Stormwater Report* for more information.**

There is no sidewalk along the east side of High Street along the property's frontage. The public sidewalk on the west side of High Street will remain. The applicant proposes to rebuild an accessible ramp in the existing sidewalk to accommodate a new crosswalk connecting to the sidewalk from

the proposed development. The sidewalk will also be rebuilt where the gas line connects into the existing main, as the existing gas line is located under the existing sidewalk. All sidewalk modifications will be designed in accordance with the Town’s performance standards.

3. For *Preliminary Plan Review*, please provide snow storage locations. If the applicants are providing snow storage locations at the end of the “hammerhead” turnaround area, will the applicants provide crush stone areas to allow the snow melt without causing any erosion?

**Response:** Snow storage locations have been added to the attached site plan. The areas designated for snow storage will not conflict with proposed landscaping and have been sited to avoid potential issues with visibility, traffic circulation, emergency access, drainage, or icing during the winter months. Snow storage areas are located in stabilized lawn areas and will be maintained without the use of crushed stone for ease of maintenance and prevention of any aesthetic issues.

4. For *Final Plan Review*, please show building setback lines.

**Response:** Acknowledged. Building setback lines will be provided on the plans submitted with the Final Plan Review application.

5. For *Final Plan Review*, please include the parcel’s Net Residential Density and Open Space calculations on the subdivision recording plan.

**Response:** Acknowledged. A Net Residential Density calculation will be provided on the recording plan, which will be submitted with the Final Plan Review application.

6. For *Final Plan Review*, please include sections for “Approved Waivers” (if any), Conditions of Approval, note in the General Notes section per §120-911-M.5.a.5.e.

**Response:** Acknowledged. A section for any approved waivers, conditions of approval, and other notes will be located in the General Notes in the Plan Set submitted with the Final Plan Review application, in conformance with §120-911-M.5.a.5.e.

7. For *Final Plan Review*, please provide an acceptable form to satisfy the Right, Title, and Interest evidence.

**Response:** Additional information providing evidence the applicants have sufficient right, title, or interest in this project will be submitted within the Final Plan Review application. This project is the result of a Request for Proposal (RFP) issued by the Town of Windham, in which the applicants, Great Falls Construction and Westbrook Development Corporation were selected.

8. For *Final Plan Review*, please provide a Portland Water District “Ability to Serve” letter and a sewer “Capacity to Serve” letter.

**Response:** Acknowledged. A response from the Portland Water District (PWD) will be forwarded upon receipt, and provided within the Final Plan Review application.

9. Does the redevelopment of the site require a DEP Stormwater Permit, and if so, please for *Final Plan Review*, please provide evidence that the permit is issued.

**Response:** Acknowledged. Evidence of a submitted Maine Department of Environmental Protection (MDEP) application will be provided within the Final Plan Review application.

**Environmental & Sustainability Coordinator:**

1. Since the proposed development is greater than 1 acre and it is in the MS4 urbanized area: Approval is subject to the requirements of the Post-Construction Stormwater Ordinance, Chapter 201. Any

*person owning, operating, leasing, or having control over stormwater management facilities required by the post-construction stormwater management plan must annually engage the services of a qualified third-party inspector who must certify compliance with the post-construction stormwater management plan on or by June 1<sup>st</sup> of each year.*

**Response: Acknowledged. An annual inspection log is attached within the stormwater report, which the Applicant will submit to the Town annually.**

**Town Engineer:**

1. *The proposed development includes the demolition of an old building that may contain hazardous materials. If a hazardous materials assessment was completed for the demolition, please submit if it hasn't already been submitted. A dust and debris management plan should be prepared and submitted for review prior to construction.*

**Response: The Windham Economic Development Corporation retained Beacon Environmental to complete a Phase I Environmental Site Assessment, dated 2/6/24. A copy of the report has been provided to the Town Engineer. A dust and debris management plan will be submitted prior to construction.**

2. *A Traffic Memorandum was submitted by the Applicant that concludes that proposed traffic levels are below the thresholds for requiring a Traffic Management Plan (TMP) from (6 peak hour trips) Maine DOT or a Traffic Impact Analysis under the Town's Subdivision Ordinance (58 trips/day). This appears to be appropriate for the scale of development.*

**Response: Acknowledged.**

3. *The Applicant submitted a Stormwater Management Report as required by Ch. 900 of the Town Subdivision Ordinance. The report indicates that since this is a redevelopment project, the applicant had chosen to use the Redevelopment Standards in Ch. 500 Section 4.C.2.d. Based on the relative pollutant rankings change from predevelopment to post-development, the required treatment level was determined to be 60%. In order to more definitively assess this conclusion, it would be helpful for the applicant to submit a diagram showing the pre- and post- development pollutant rankings corresponding to what was used in Table 2 of the stormwater report.*

**Response: Acknowledged. A pre- and post-development pollutant ranking plan will be submitted in the Stormwater Report within the Final Plan Review application.**

4. *To achieve the 60% treatment level for the site, the Applicant has proposed roof drip edge filters for the buildings and a subsurface sand filter to treat surface runoff from other impervious site areas. These methods appear to be appropriate for the site and result in 91% of the site's impervious area and 63% of the site's overall developed area in compliance with Ch. 500. A couple questions/comments on the treatment:*

*Please sketch a general outline of the sand filter chamber system on the grading plan.*

**Response: Acknowledged. The subsurface chamber system outline will be added to the *Grading Plan* in the Final Plan Review application.**

*Please clarify the determination of the 1.27-ft. hmax for orifice sizing. It was not clear from the HydroCAD analysis and the plans that this is accurate.*

**Response: Acknowledged. Hmax is calculated by dividing the total treatment volume by the filter's surface area. Hmax is the Water Quality Volume, which cannot exceed 1.5 ft. as dictated by Maine DEP standards for BMPs. Based on the hmax and that the system needs to drain within 24-48 hours,**

**our orifice sizing determines that a 1.43 inch orifice on the outlet pipe of the chamber system will not exceed the 1.5ft hmax value and will allow the system to drain in between 24-48 hours.**

5. *The proposed development will disturb more than 1 acre of site, but create less than 1 acre of impervious area. A stormwater permit-by-rule with Maine DEP will be required; the Applicant should submit documentation that a Notice of Intent for this permit has been filed with DEP with the final application.*

**Response: Acknowledged. Evidence of a submitted Maine Department of Environmental Protection (MDEP) permit application will be provided within the Final Plan Review application.**

6. *Letters to Portland Water District were included in the application requesting ability to provide water and sewer service to the site. The applicant should submit documentation of Ability to Serve from PWD when they are received.*

**Response: Acknowledged. A response from the Portland Water District (PWD) will be forwarded upon receipt and provided within the Final Plan Review application.**

7. *No information on lighting was found in the application. Please submit information on the type and location of lighting at the site.*

**Response: Acknowledged. Sufficient lighting information, including their respective types and locations, will be provided within the Final Plan Review application.**

We appreciate your attention to this project, and we look forward to its successful completion. Upon your review, please contact me if you have any additional comments or require additional information. Thank you for your time and consideration.

Sincerely,

SEBAGO TECHNICS, INC.



Amy Bell Segal, RLA  
Senior Project Manager & Landscape Architect  
Maine Licensed Landscape Architect

ABS/bjw

Enc.

# AGENT AUTHORIZATION

<b>APPLICANT/ OWNER</b>	<b>Name</b>	Tyler Norod, Development Director Westbrook Development Corporation		
<b>PROPERTY DESCRIPTION</b>	<b>Physical Address</b>	30 Liza Harmon Drive Westbrook, ME 04092		<b>Map</b> 37
				<b>Lot</b> 24
<b>APPLICANT'S AGENT INFORMATION</b>	<b>Name</b>	Sebago Technics, Inc. c/o Amy Bell-Segal, RLA		
	<b>Phone</b>	(207) 200-2100	<b>Business Name &amp; Mailing Address</b>	<b>SEBAGO TECHNICS, INC.</b> 75 John Roberts Road, Suite 4A South Portland, ME 04106

Tyler Norod

10/11/24

APPLICANT SIGNATURE      DATE

Tyler Norod

PLEASE TYPE OR PRINT NAME HERE

amybellsegal.

APP

19/2024

**Amy Bell-Segal, RLA**  
**Project Manager**  
**Sebago Technics, Inc.**

PLEASE TYPE OR PRINT NAME HERE

