

October 20, 2025

Town of Windham Attn: Stephen Puleo, Amanda Lessard 8 School Rd Windham, ME 04062

Re: #24-29 – Major Site Plan & Conditional Use – Camping World Expansion – 480 Roosevelt Trail – Sketch Plan Review – Camping World RV Sales, LLC

Dear Stephen and Amanda,

Please accept the resubmittal addressing the review comments dated October 14, 2025.

## **Staff Review Comments**

- Per §120-807F(1), where an Maine DEP Site Location of Development Act (SLODA) Permit has
  not been received as part of the amended site plan submission, see Condition of Approval.
  Excel Response: We are nearing approval of an updated SLODA permit with Maine DEP, and it
  will be provided to the Town immediately upon receipt.
- Please provide the Town a copy of any comments provided by Maine DEP and any response to comments related to your amended SLODA application.
   Excel Response: Maine DEP comments and our responses to comments have been included in this resubmittal. See below in this document.
- Recommended CONDITIONS OF APPROVALS:
  - Approval is dependent upon and limited to the proposals and plans contained in the
    application dated October 3, 2024 as amended September 3, 2025 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.

Excel Response: Understood.

 Approval is subject to the requirements of the Post-Construction Stormwater Ordinance, Chapter 201 Article II. 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 1st of each year.

Excel Response: Understood.

3. 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.

Excel Response: Understood.

4. In accordance with §120-548D of the Land Use Ordinance, the outdoor retails sales approval shall be limited to the applicant and therefore, shall not run with the land.

Excel Response: Understood.

5. No septic permit shall be issued by the Code Enforcement Officer until the applicant provides the Planner with the Maine DEP Site Location of Development Act Permit Amendment.

Excel Response: Understood. Approved SLODA permit will be forwarded to the Town immediately upon receipt from Maine DEP.

## **Code Enforcement Department**

Recommended HHE\_200 Condition of Approval: At minimum the Code Enforcement
Department will require quarterly monitoring of the design flow of the dump station as per
Section 5 (F) G of the Subsurface Wastewater Disposal Rules. Note: An alternative calculation
method based on water use data may be approved if a system designer can prove it is equally
effective.

Excel Response: Understood. Camping World will log flow meter data for quarterly monitoring by the Town.

## **Maine DEP SLODA Comments and Responses**

Below are the comments we received from Maine DEP, as well as our responses in red.

1. The HHE-200 form and other documents submitted specify a design flow for the system of 1100 gallons per day, assuming, in part, 600 gallons per day usage by employees. Evidence cited in the 5/12/25 approval indicates an average daily water usage of 540 gallons, consistent with the estimate used to prepare the design, but a peak daily water usage of 1013 gallons. Since this is water usage is does not reflect any dumping at the facility, but usage exceeding the estimate by a substantial amount. Actual wastewater flows are not known but it appears from the information submitted that the existing system is failing, possibly due to higher flows than accounted for in the design; it appears from the HHE-200 form that design details for this system are not available. The cause or frequency of higher-than-average usage is not apparent from the information available, but obviously disposal systems must be designed for the highest expected flows unless there is a definite procedure for identifying and temporarily storing such flows until they can be discharged in a way that will not result in exceedance of the design flow. It is also possible that some or all of the additional demand is not discharged to the wastewater system. The applicant must account for the occasional highwater usage and demonstrate that this will not result in exceedance of the design flows.

- a. Camping World fills the water tanks of the RVs each time they sell or deliver a camper to a customer. These tanks are 40 gallons on average, and they will deliver or prep to deliver up to 10 units in a given day. This accounts for the peak water usage being higher than the HHE form reflects, even though this water is not discharged to the wastewater system.
- 2. The applicant must submit a plan or plans with accompany narrative demonstrating that the proposed system will meet all setbacks, as required by Department rules Chapter 500 and Subsurface Wastewater Disposal Rules Table 8B, from stormwater management systems and other features on both the subject property and adjacent or nearby properties. Department approval C-N, dated 9/22/21, suggests that at least one onsite stormwater basin is lined, which could affect the setback required under Table 8B, but adequate separation must be demonstrated for all onsite and offsite stormwater facilities and other relevant structures and site features.
  - a. Excel has provided DEP with an appropriate map showing that all required setbacks for the existing septic tank and disposal field are met.
- 3. It is not known what details were provided to demonstrate compliance of the existing wastewater disposal system with Department standards for nitrate-nitrogen at property boundaries and other water quality standards. For the proposed new system, the applicant must submit information demonstrating that these standards will be met. Basic procedures are outlined in Site Location Application form Section 17, but the applicant must note that, due to the proportion of pumpout wastewater in the waste stream, the initial concentration of 40 mg/L for nitrate-N to be assumed for domestic wastewater is likely to be low, and the applicant should adjust the initial concentration upward if a dilution model is used to assess potential impact. Alternately, the applicant may choose to provide effluent treatment to reduce the initial nitrogen concentration and extend the life of the disposal field. Given that the existing system is reported to be failing, measures to reduce loading of TSS and other parameters that could affect disposal field performance may be advisable.
  - a. Per correspondence with Maine DEP, Camping World will install a treatment device in accordance with DEP standards to address this comment. The final device is still being confirmed and this is the last item being finalized before the updated SLODA permit is approved.

The submittal documents have been revised per the comments above. Please accept for review and approval. Please let me know if you have any comments, questions, or need additional information.

Sincerely,

**Grant Duchac** 

**Project Manager**