



March 17, 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 March 3, 2025.

Site Plan Review Application & Checklist:

- §120-811B(1)(c) [2] and [4]: The property owner and applicant information does match the property deed provided (FRHP Lincolnshire, LLC) or the Maine Secretary of State's corporation database information (Camping World RV Sales, LLC). Please update the application form and provide evidence of the connection between the property owner and the applicant.

Excel Response: Documentation showing the relationship between FRHP Lincolnshire, LLC (FRHP 3 LLC) and Camping World will be provided. The application form has also been updated.

- §120-811B(1)(d)[1][b]: The acreage of the parcel is noted as 16.85 acres. The lot size shown on the 2021 site plan approval listed the lot size as 15.4 acres. Clarification should be provided.

Excel Response: The surveyor has spoken with the assessing department for the Town of Windham, and both came to the agreement that 16.85 acres, as shown on the current plans, is the correct property area. The 2021 site plan approval was based on prior deeds and partial plans with approximate areas. It was determined that the current survey best represents the property. The property area is now shown on the survey. The survey was updated by Survey, Inc. on March 13, 2025.

- §120-811B(2)(h): A traffic impact study, including the turn lane analysis and input from Maine DOT as required by the Planning Board at the meeting on February 10, 2025.

Excel Response: A left turn lane warrant analysis has been completed by Sebago Technics and it was determined that a left turn lane is not warranted. Reference attached left turn land warrant analysis memorandum.

- The Commercial District Design Standards Checklist Narrative was not specific as to how the plan is in compliance with the standards. For example: §120-813B(7) Parking Lot Landscaping: the narrative should have listed the landscaping calculations or referred to plan sheet C1.4; §120-813A(5) Facades: please provide the percentage of glazing provided.

Excel Response: Understood, comment addressed.

- Missing Existing Conditions Plan: Please provide the Existing Conditions Plan or include the required information on the EC plan, as indicated in the application checklist sections: D. i., ii. a. & b., iv., vi., xi., xv. f., xvii., and xiv.

- o Additionally, the following plan requirements are missing from Section E: iii., vii. – Missing proposed signage, xi.

- o Sheet C1.1 is missing an approval block, plan references, survey information, and sections for Conditions of Approval and Approved Waivers

- o The following exhibits are also missing from checklist Section 2 requirements: b.2., d., g., and h.

Excel Response: Plans updated accordingly.

- Please review and update the submission accordingly.

Excel Response: Submission updated accordingly.

- General Comment: There are too many subsections within the plan sets, such as C 1.0 A, B, etc. Consider consolidating where possible to improve clarity and organization.

Excel Response: The plans provided are consistent with the construction plan set. The cover sheet has blocks for Planning Board signatures and approved conditions of approval and waivers. Enlarged plan sheets can be removed for Planning Board purposes. The full plan set ensures completeness and consistency with the construction set.

- The Subsurface Wastewater Disposal System Application dated October 18, 2023, is inconsistent with the application submitted to the Code Department last year for the emergency repair permit. It is unacceptable that “10 dump stations x 5 = 500 gpd” was added to the design flow box without proper documentation. You must provide the correct application immediately. Furthermore, if a dump station is proposed, including design approval from the Department of Health and Human Services (DHHS) is imperative.

Excel Response: The dump station has been removed from the plans. If Camping World pursues a dump station in the future, DHHS approval will be obtained prior to seeking Town approval.

- Please specify the maximum number of campers, trailers, and motor homes that will be stored on the site.

Excel Response: The site has 301 allocated RV spaces. This is shown on sheet C0.1

- The Town Engineer will provide comments during the week of March 3, 2025.

Excel Response: Engineering comments received.

CONDITIONS OF APPROVAL (Required)

1. Approval is dependent upon and limited to the proposals and plans contained in the application dated October 3, 2024 as amended February 18, 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.

2. 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 May 1st of each year. The applicant shall include data of soil permeability and drawdown times of underdrain soil filter basins.

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 retail sales approval shall be limited to the applicant and therefore, shall not run with the land.

Excel Response: Understood.

5. The development is subject to the following Article 12 Impact Fees, to be paid with the issuance of new building permits for the expanded uses: North Route 302 Road Improvements Impact Fee of TBD (TBD per peak hour trip through Route 302/Anglers Rd/Whites Bridge Intersection); Public Safety Impact Fee; and Municipal Office Impact Fee. All fees will be determined and collected for any building, or any other permit for the development, Section 120-1201C.

Excel Response: Understood.

Code Enforcement - Jonathan Rioux, Code Enforcement Director

The most current approved subsurface wastewater permit for 480 is Roosevelt Trail is Permit # 24-001381(Commercial-SSWW): "replacement system, non-engineered disposal field (only) with existing treatment tanks for 50 employees at 12 gpd, dated 8-15-2024".

The initial HHE-200 application dated 10-18-23 that included a "10 dump station X 5 for an additional 500 gallons per day was not approved. The recreational vehicle dump station(s) were removed by the applicant on 8-15-2024 and amended/ revised again to include a change in the disposal field elevations on 8-18-2024.

A new HHE-200 application would be required for the addition of a recreational vehicle dump station(s) and the designed system would need to meet first-time system criteria as per subsurface wastewater disposal. In addition, we would require additional information on the design flow (including an owner's statement) and any values greater than 2,000 gpd would require approval by the Department of Environmental Protection.

If the applicant would like to move forward with a recreational vehicle dumping station please have them reach out to our Department.

Excel Response: Dump stations have been removed from the plans.

Town Engineer – General Comments

- Provide details on the proposed paint booth to confirm whether it requires and an air emission permit from Maine DEP;

Excel Response: A Maine DEP Air and Emission Permit is not required for the paint booth.

- In the Operations & Safety Plan, the Maine DEP Emergency Spill Hotline number should be included (800) 482-0777. What total quantity of oil storage will there be on site?

Excel Response: No engine work or oil changed will occur on Camping World's site – oil will not be stored on-site.

Traffic

- The entrance off of Route 302 appears to exceed the maximum of 3% for one vehicle length specified in Windham Land Use Ordinance Performance Standards for Curb Cuts and Driveway Openings, Section 500, paragraph E.

Excel Response: This is an existing condition at an existing driveway due to matching existing grades. A deviation from the performance standard due to the existing constraints is proposed.

- The mixed traffic of RVs and personal automobiles entering and existing onto or off-of a busy arterial road such as Route 302 has the potential to be problematic. The Applicant should conduct a turning lane analysis to determine if a turn lane on 302 is warranted.

Excel Response: A turn lane warrant analysis has been completed by Sebago Technics and it was determined that a left turn lane is not warranted. Reference attached left turn land warrant analysis memorandum.

Stormwater

- The Applicant's stormwater report has indicated that the proposed work at the front area of the site adjacent to Rte. 302 should just be considered maintenance and therefore requires no treatment. I'm not sure that I agree with this conclusion. A portion of this existing area is occupied by a building that will be replaced with paved parking and the flow paths will change because of the proposed islands; also, by directing the runoff on the east side of the parking area to a curb and gutter, there will be a point discharge into the swale along Rte. 302 whereas current the drainage appears to sheet flow off the pavement.

Excel Response: Per our conversation with Mark, we agreed that the contours/grades are being matched and can therefore be considered maintenance (for the northeast corner area of the parking lot). The curb islands have also been revised to allow for sheet flow rather than concentrating the flow, as discussed. The area where the building is being replaced with pavement will be treated by the JellyFish Filter.

- The Applicant has indicated that it will rely on the existing stormwater BMPs to provide the required quality treatment and flooding control to meet Maine DEP and the Town's stormwater requirements. The plans for the Stormwater BMPs approved by the Planning Board during the 2021 site plan amendment process include notes (see below) that say that the Applicant shall submit evidence/information to the Maine DEP that the BMPs (the wet

pond and underdrain soil filters) were constructed as required by regulation and as specified on the plans. The Applicant should provide copies of this documentation to the Town.

Excel Response: Per conversations with Mark Arienti, we will be working with the Town to complete documentation of the existing BMPs on site as we do not have documentation from the previous project.

CONSTRUCTION NOTES:

1. STORMWATER RUNOFF SHALL BYPASS THE POND UNTIL THE SITE IS SUBSTANTIALLY COMPLETED AND STABILIZED.
2. CONSTRUCTION OVERSIGHT: INSPECTION BY A PROFESSIONAL ENGINEER WILL CONSIST OF WEEKLY VISITS TO THE SITE TO INSPECT THE INSTALLATION OF THE POND'S EMBANKMENT CONSTRUCTION, STORMWATER INLET, UNDERDRAINED GRAVEL OUTLET, GRAVEL OUTLET FILTER MATERIAL MAKEUP AND PLACEMENT, AND EMERGENCY SPILLWAY CONSTRUCTION FROM INITIAL GROUND DISTURBANCE TO FINAL STABILIZATION OF THE POND.
3. WITHIN 30 DAYS OF COMPLETION OF THE WET POND, THE APPLICANT SHALL SUBMIT A LOG OF INSPECTION REPORTS DETAILING THE ITEMS INSPECTED, PHOTOS TAKEN, AND THE DATES OF EACH INSPECTION TO THE MAINE DEP BUREAU OF LAND RESOURCES FOR REVIEW.

- Appendix A of the Stormwater Report includes Pre-Development and Post-Development exhibits that indicate CN (Curve Number) values for the several drainage basins/catchments. I'm particularly curious about the CN for Basin 1, the parking area between the building and Rte. 302. For Post-development it shows 0.75 acres out of 2.57 ac as CN=39, which indicates vegetated area, whereas for Pre-development it shows 0.22 ac out of 2.55 ac as CN=39. This is essentially saying that the proposed development of the site will result in more than half an acre more of non-paved, non-building area than currently exists. This may be true, but further information should be provided to document this. This is important because if these values are not accurate, then the post-vs. pre-development peak flows may be inaccurately portrayed and the existing treatment BMPs may not be sufficient.

Excel Response: The pavement limits for the proposed site plan have slightly shrunk, reducing some pavement surface area around the perimeters and corners. That, combined with the addition of the multiple landscaped islands, accounts for the reduction in impervious for Basin 1.

- I don't understand the Hydrocad analysis that's been presented. The flow paths from Pre-to Post-Development have changed at least for the front area between the building and Rte. 302 because of the curb and gutter on the east side; also the concrete flume at the rear of the building appears to direct a concentrated flow into the existing underdrain soil filter. A concentrated flow can not directed into the underdrain soil filter without a forebay to trap sediment and slow down the flow. The concentrated flow path will also alter peak flow rates and the stormwater report does not detail these.

Excel Response: A level spreader has been added to the point of discharge from the storm sewer pipes to spread the flow and slow down the flow.

- Finally, the Routing Diagram shows all the catchment flows going to one point for a total

Post and Pre and no peak flow numbers are actually provided. The catchments flow to different areas and these should be totaled separately so its possible to determine compliance with the flooding standard.

Excel Response: A table has been added to the post development basin map within the stormwater report to show pre to post peak flows. The table shows each area's peak flows being reduced for the 25-year storm to meet the flooding standard. Please reference the updated HydroCAD calculations.

SLODA 2021

The 2021 Site Location of Development Act (SLODA) permit from Maine DEP for their parking lot expansion specifically says that the existing subsurface wastewater disposal system could not be used for disposal of wastewater from the holding tanks of camping trailers and RVs, but instead had to be hauled off-site to a licensed wastewater disposal facility. The Applicant needs to clarify that they have approval from the Maine DEP Bureau of Water Quality Division of Environmental Assessment for disposal of holding tank pump-outs in their current on-site subsurface disposal system or a modified and upgraded system to be built as part of the current application.

Excel Response: The dump stations have been removed from the plans as discussed with Steve and Amanda.

This information was reviewed by the DEA. In its review comments, DEA stated that the existing wastewater disposal system appears to be adequately sized for the described use. DEA also stated that wastewater from the trailers and RVs, or any other wastewater source other than the normal sanitary wastewater from the facility, is not allowed to be disposed of in the existing wastewater disposal field. Such wastewaters must be disposed of off-site, consistent with contracting with a sewage pumping service to pump the sewage tank and dispose of the wastewater off-site at a licensed facility.

Based on the DEA's comments, the Department finds that the proposed use of the existing wastewater disposal system is adequately sized provided that only normal sanitary wastewater from the building is disposed of in the existing subsurface waste water system, and that wastewater from holding tanks in the camping trailers and RVs and any other source of wastewater is collected and hauled for disposal by contracting with a sewage pumping service to dispose of the wastewater off-site at a licensed facility.

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
Senior Project Manager