

May 1, 2018

707 Sable Oaks Drive, Suite 30 South Portland, Maine 04106 207.772.2515

Ms. Amanda Lessard Planner Town of Windham 8 School Road Windham ME 04062

Re: Letter of Correspondence #1

Site Plan Review

Shared Maintenance Facility

185 Windham Center Road, Windham, Maine

## Dear Amanda:

Based upon comments received at the planning board meeting on April 23, Gorrill Palmer has prepared revised plans showing an option for relocation of the fuel tanks, and a discussion of the site impacts within the stream buffer area. The following narrative presents our response.

The Site Layout and Utility Plan, and the Grading, Drainage, and Erosion Control Plan attached to this letter contain an option for the location of the fuel tanks and dispensers. Given the location of the existing Public Works site and the constraints of the site layout, any location on the site is tributary to either the Pleasant River or the unnamed stream (which is also tributary to the river). The location of the fueling station shown on the revised plans is roughly as far from the Pleasant River or the stream as is possible for this site. The proposed location is tributary to the Focal Point filtration system which would provide an opportunity for containing any spills before they reach the river. The Focal Point system is lined with an impermeable liner and contains an outlet control valve on the chamber system underdrain that could be closed in the event of a spill. The additional flow path across the parking lot provided by this option presents an opportunity to intercept a spill with oil absorbent booms which are kept on-site for spill control as part of the site's Spill Prevention Control and Countermeasure Plan. As with the original layout, the fuel system will consist of dual wall tanks that are electronically monitored for leakage, dual wall piping that is electronically monitored for leakage, and collection sumps at fuel tank filling and valve locations. The dispenser pumps are equipped with automatic shut off valves that will shut off fuel flow if a dispenser hose is damaged. The original fuel system location is being reviewed by the MDEP for its siting and for the Spill Prevention Control and Countermeasure Plan for this site. The revised system location would need approval from MDEP (as a Minor Revision) if the revised location was preferred by the Town. It is our position that either location of the fueling station is safe and an improvement over the existing condition.

The unnamed stream along the easterly edge of the site has a 75 foot buffer regulated by the MDEP and a <u>recommended</u> 100 foot buffer requested by the Maine Department of Inland Fisheries and Wildlife. As with development within wetland areas, avoidance of disturbance is required to the extent practicable. When avoidance of disturbance cannot be achieved, a permitting process through the MDEP is required. The permitting process has several levels of permitting dependent on the proposed disturbance. For impacts to a stream buffer, a NRPA Permit by Rule is available from the MDEP when certain requirements are met. Disturbance within 25 feet of the stream is prohibited, and the disturbance needs

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to be limited to the extent practicable. An application for an NRPA Permit by Rule has been submitted to the MDEP for the proposed 960 sf impact and is currently under review. The existing stream buffer (both 75' and 100') are currently impacted by development, and the proposed project will reduce impacts in both the 75' and 100' buffer. The proposed impervious area within the 75 foot buffer will be reduced by 1,600 sf from current conditions, and an area of 7,350 sf of previously disturbed vegetation will be designated for natural regrowth (not mowed more than 2 times per year). It is impracticable to redesign the project to eliminate grading impacts within the 75' and 100' stream buffer without detrimental impacts to the safe operation of the site.

Finally, as of the date of submission, we do not have our MaineDEP permits in hand. We hope that the permits will be completed prior to the May 14 Planning Board meeting.

## Closure

We look forward to reviewing these comments with Planning Staff and the Planning Board. Do not hesitate to contact us with any questions or for additional information.

Sincerely, Gorrill Palmer

William C. Haskell, PE

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Principal

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