

MEMORANDUM

TO: Cape Elizabeth Town Council
FROM: Conservation Committee
DATE: June 30, 2017
SUBJECT: Paper Street Technical Assessment

In October of 2016, the Conservation Committee received the following charge from the Town Council:

Moved by James M. Garvin and Seconded by Jessica L. Sullivan

ORDERED, the Cape Elizabeth Town Council directs the Conservation Committee to revisit and review the 2013 Greenbelt Plan, previously adopted by the Town Council on January 6, 2014, specifically as it relates to the potential trails indicated along the paper streets of Surfside Avenue (U12-5) and Atlantic Place (U12-8), as well as any potential future trail development along the paper street at Lighthouse Point Road (U15-1), and provide an update to the Town Council within six (6) months. It is requested that the review encompass a thorough assessment of the technical and logistical feasibility, along with all other practical considerations, to determine a complete cost-benefit analysis of any potential trail development. (7 yes) (0 no)*

*The Town Council extended the deadline to June 30, 2017 at the March 13, 2017 meeting.

The Conservation Committee used the town's engineering firm, Sebago Technics, to conduct the "assessment of the technical and logistical feasibility" of putting trails in at Surfside, Atlantic Place and Lighthouse Point Road.

A report on the technical feasibility is attached, and finds that there are no significant technical or logistical barriers to putting simple, 2-3 foot wide trails at either location.

With regard to "other practical considerations," the Conservation Committee construed this to mean any other factors that might impact the creation of a trail, including current and future connectivity, neighborhood attitudes and comments, and issues such as parking and access.

Lighthouse Point Rd: Lighthouse Point Rd was not recommended as a potential trail in the 2013 Greenbelt Plan. Since undertaking this work, the Conservation Committee has received a number of citizen statements recommending against any potential trail development at the Lighthouse Point paper street which are part of the public record of its deliberations. The Conservation Committee does not consider the Lighthouse Point paper street a suitable location for a trail at this time. Should ownership change, or official public access become available on the adjoining property, a trail connection should be reconsidered at that time. Consideration should include the solicitation of citizen comments.

Surfside/Atlantic Ave: The Surfside/Atlantic potential trail is identified as Link #23 in the 2013 Greenbelt Plan. This potential trail supports five goals of the 2013 Greenbelt Plan. They include: Opportunities, Underserved neighborhoods, Informal trails, Water body access and Long distance walks. There is support for a more formal trail at Surfside Avenue-appears to be stronger, and the committee would consider assisting in constructing a trail in this area if the neighborhood association requested it. However, the committee would like to emphasize to the Town Council that it has no plans to put ~~in a trails in at either location~~ at present, and it would only consider ~~trail installation if developing such plans if~~ residents requested us to do so.

The Conservation Committee ~~reaffirms would also like to strongly re-emphasize~~ its previous recommendation to the Town Council that the town ~~maintain preserve~~ the rights to the paper

streets in both locations to preserve potential future access for utilities, transportation, or recreation in the decades to come. The Conservation Committee also reaffirms its recommendations in the 2013 Greenbelt Plan for both trail locations.

Respectfully submitted on behalf of the Conservation Committee,

James C. Tassé, Chair
30 Cliff Avenue
Cape Elizabeth, ME 04107

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Surfside Ave/Atlantic Ave: The Surfside/Atlantic potential trail is identified as Link #23 in the 2013 Greenbelt Plan. This potential trail supports five goals of the 2013 Greenbelt Plan. They include: Opportunities, Underserved neighborhoods, Informal trails, Water body access and Long distance walks. There is support for a more formal trail at Surfside Avenue, and the committee would consider assisting in constructing a trail in this area if the neighborhood association requested it. However, the committee would like to emphasize to the Town Council that it has no plans to put in a trail at present, and it would only consider trail installation if residents requested us to do so.

The Conservation Committee reaffirms its previous recommendation to the Town Council that the town maintain the rights to the paper streets in both locations to preserve potential future access for utilities, transportation, or recreation in the decades to come. The Conservation

Committee also reaffirms its recommendations in the 2013 Greenbelt Plan for both trail locations.

Respectfully submitted on behalf of the Conservation Committee,

James C. Tassé, Chair
30 Cliff Avenue
Cape Elizabeth, ME 04107

Draft Executive Summary

The Town Council referred to the Conservation Committee the task of conducting a technical feasibility study for the installation of trails on Lighthouse Point Rd, Surfside Ave and Atlantic Place. The Conservation Committee prepared a scope of work and the Town of Cape Elizabeth retained Town Engineer Steve Harding and Sebago Technics Inc. to conduct a technical assessment.

The Sebago Technics reports include a standard boundary survey of the paper streets, potential trail alignment and an assessment of technical feasibility, permitting and costs. The technical analysis concludes that the trails can be built with minimal disruption to existing topography and vegetation and for modest costs.

The Conservation Committee reviewed the Sebago Technics Reports, referenced the 2013 Greenbelt Plan recommendations, and received public comments at 6 meetings and in writing. The Conservation Committee reaffirms the recommendations in the 2013 Greenbelt Plan. The Conservation Committee does not recommend that a trail be constructed on Lighthouse Point Rd at this time. It also reaffirms its recommendation in the 2013 Greenbelt Plan that trail link #23, which represents Surfside Ave and Atlantic Place, is a potential trail that meets 5 of the Greenbelt Plan goals. The Conservation Committee has no plans to install the trail at this time, but would support trail construction if requested by the neighborhood association.

The Conservation Committee also supports preservation of paper street rights held by the town.



May 30, 2017
16493

Cape Elizabeth Conservation Committee
Maureen O'Meara, Town Planner
Town of Cape Elizabeth
320 Ocean House Road
Cape Elizabeth, Maine 04107

RE: Lighthouse Point Road - Paper Street Survey, Concept Design, and Permitting Investigation

Dear Committee Members and Maureen:

Introduction

Sebago Technics, Inc. (Sebago) has been retained by the Town of Cape Elizabeth (Town) in the survey, concept planning, and the potential permitting situation associated with the paper street section of Lighthouse Point Road for the purposes of determining the feasibility of creating a new greenbelt path. Sebago has not solicited public feedback on "other practical considerations" as part of this review process. The following discussion provides an assessment of the conditions associated with the proposed path project.

Project Scope

The Town Council requested a feasibility review for a potential new trail to extend from the end of the currently accepted section of Lighthouse Point Road through its paper street segment to connect to property currently owned by the United States of America and utilized by the U.S Coast Guard. A 2014 USGS Quadrangle based Location Map showing the location of Lighthouse Point Road within Cape Elizabeth is included within the appendix section of this report.

According to the February 6, 2017 Right of Way Survey Plan of Lighthouse Point Road as prepared by Sebago which is included with this report, the paper street segment is approximately 192 feet in length and has a width of 40 feet. Approximately, 85 feet of the paper street segment consists of a bituminous asphalt paved roadway used to access two private lots (Map U14/Lot 27 & 28 and Map U15/Lot 19) at the end of Lighthouse Point Road. The remaining approximately 107 feet length of the paper street is currently covered by a landscaped garden on the northerly side and a mowed grass lawn on its southerly side. There is a clear space zone width of 20 to 25 feet of grass area to the south of the garden bed materials along the entire length of non-paved area.

As the terrain in the unpaved segment of the paper street is gently sloping, a path could be readily established, likely without the need for any surface treatment with only the Town's Greenbelt signage be needed to indicate the path presence.

Given the ample clear space, it was also assumed that no removal of the existing planted garden would result with the any future trail improvement. Should the Town determine at some point in the future to establish the path, a row of vegetation could be provided alongside the southern limits of the paper street to better indicate the path location and adjacent private property boundary.

Resource Investigation

There are no wetlands or vernal pools within the unpaved segment of the Lighthouse Point Road paper street.

Permitting Considerations

As no natural protected resources are affected or other permit thresholds met, the establishment of the Lighthouse Point Road paper street path would not require any local, state, and federal permits respectively be received under current regulations from the Town of Cape Elizabeth, the Maine Department of Environmental Protection (DEP), or the U.S. Army Corps of Engineers (USACE). There are also agencies within the state and the federal process that can influence permitting and design issues of projects, however since the Maine DEP and the USACE permits are not triggered, these other agencies would not review the potential path improvements.

Conclusion

This report has investigated the feasibility for the Town to establish a path with the 192+/- foot paper street portion of the Lighthouse Point Road. Sebago has not solicited public feedback on "other practical considerations" as part of this review process. Based on the boundary and existing conditions survey conducted by Sebago along with the evaluation of the path potential undertaken by Sebago in concert with the Town staff, it appears that such a path would be readily achievable.

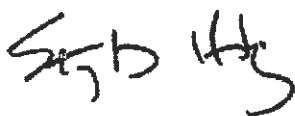
Further, no permitting ramifications would result for the path establishment under current local, state, and federal regulations. Consequently, no permitting or construction costs would likely be necessary to establish the path with the exception of placing Greenbelt Path signage and potentially installing a row of plantings to better define the path location and limits of the southerly abutting private land alongside the paper street boundary. Should the Town desire to install the planting barrier alongside the path, we envision a cost of \$500 to \$1,000 could be considered in terms of 2017 costs depending on the nature and extent of the plantings.

Closing

Sebago Technics is very appreciative of the Town's request that we survey and study the various aspects of the potential Lighthouse Point Road paper street path project. Should there be any questions or comments regarding this report, please do not hesitate to contact us.

Sincerely,

SEBAGO TECHNICS, INC.



Stephen D. Harding, P.E.
Town Engineer

SDH/sdh



May 30, 2017
16493

Cape Elizabeth Conservation Committee
Maureen O'Meara, Town Planner
Town of Cape Elizabeth
320 Ocean House Road
Cape Elizabeth, Maine 04107

**RE: Paper Street Survey, Concept Design, and Permitting Investigation
Surf Side Avenue & Atlantic Place**

Dear Committee Members and Maureen:

Introduction

Sebago Technics, Inc. (Sebago) has been retained by the Town of Cape Elizabeth (Town) in the survey, natural resource mapping, concept planning, and the potential permitting conditions associated with the paper street sections of Surf Side Avenue and Atlantic Place for the purposes of determining the feasibility of creating a new greenbelt path. Sebago has communicated with both State and Federal regulatory agencies as well as the Town staff that would have input into the design and permitting process. Sebago has not solicited public feedback on "other practical considerations" as part of this review process. The following discussion provides an assessment of the conditions associated with the proposed path project.

Potential Project Scope

The Town Council requested a feasibility review for a potential trail to extend through the paper streets of Surf Side Avenue and Atlantic Place. A 2014 USGS Quadrangle based Location Map showing the location of the potential project area within Cape Elizabeth is included within the appendix section of this report. We have also included several photographs of the project area in the appendix section of this report.

According to the February 6, 2017 Right-of-Way Survey Plan of Atlantic Place & Surf Side Avenue as prepared by Sebago which is included with this report, the paper street segment of Surf Side Avenue is approximately 1,500 feet in length and has a width of 50 feet that widens at its northeasterly end and the paper street segment of Atlantic Place is approximately 550 feet in length and has a width of 20 feet. Therefore depending on its eventual alignment, the path could be roughly 2,050 linear feet in length.

For the purposes of our evaluation, we assumed that only five feet of clear zone would be required and that the path would be an unimproved foot path similar to other rustic paths within the Town's Greenbelt with minimal isolated improvements (narrow boardwalk, stone placement, or other minimalistic improvements in wet areas or those areas crossing drainage paths). We also have assumed that similar to other Town Greenbelt rustic paths that no fill material would be placed in order to establish the path nor would any trees would be removed.

The path would begin just beyond the end of the improved bituminous asphalt pavement portion of Pilot Point Road near its intersection with Waumbek Road. From the easterly side of the gravel road extension of Pilot Point Road, the path would potentially meander southeasterly through existing trails

within the limits of Surf Side Avenue and through a parcel identified on Map U12 with no apparent owner. It is important to note that, if necessary, the path could veer away from the existing casual path alignment and completely stay within the Surf Side Avenue right-of-way limits and not enter the lot on Map U12.

From this point, the trail would then extend westward through low growing shrubs which would need to be cut back to provide access. The trail then extends westward on mowed lawn, through another section of natural vegetation, across another mowed lawn, then around a fenced garden, through an undeveloped wooded lot, and on through an expanse of mowed lawns to the intersection with Atlantic Place. Once within the Atlantic Place right-of-way, the trail would extend along a gravel driveway, alongside a mulched landscape bed, and onto the paved portion of Atlantic Place, eventually intersecting with Pilot Point Road.

There appears to be sufficient area to preserve native growth between the trail and the top of the nearby cliff and potential to also add vegetated buffers between a potential trail and abutting home owners which would better define the path alignment and help demarcate public versus private property. For the possible vegetated buffers being designed to provide a separation between private property and the path, care should be taken to select plantings that will not affect the private landowners' views of the ocean.

Resource Investigation

In order to assess the resources which would need to be considered in the placement of the path and any permitting required to be able to construct the project, Sebago Technics investigated the limits of the isolated wetland boundaries within the Surf Side Avenue right-of-way and flagged these wetlands in the field. No wetlands are present within the Atlantic Place right-of-way. The delineation was performed in April of 2017 by Sebago's Gary Fullerton and was conducted in general accordance with the 1987 Wetlands Delineation Manual and Northeast Regional Supplement authored and published by the U.S. Army Corps of Engineers (USACE). A separate report of wetland field investigation findings along with a variety of site wetland photographs are included in the appendix section of this report.

In general, our field delineation identified six isolated freshwater wetland areas and no vernal pools. Two of these wetlands are located on the northeast section of Surf Side Avenue and are currently being avoided by foot traffic. Another narrow wetland area, to the east of the gravel road extension of Pilot Point Road in the northeast section of Surf Side Avenue, is currently being crossed via several large stones being placed in the wetland which has a width of about 10 feet. This wetland could either be avoided completely by relocating the trail alignment or the crossing could be enhanced by adding some additional stepping stones or potentially a short section of boardwalk.

Three other isolated wetland pockets were located near the central area of Surf Side Avenue. All three are being crossed by foot traffic through the existing trail segments, however, the two most westerly pockets could easily be avoided by shifting the path further to the north where there are 20 to 40-foot clearances from the wetland edges available from the northerly right-of-way limits. The wetland located near lots identified as #4 (Map U12/Lot 70) and #5 (part of Map U12/Lot 71) is a bit more problematic to avoid as the wetland is very close to the northerly limits of the right-of-way and there is a nearby cliff section toward the southerly right-of-way limit. The path through this wetland could be enhanced by a short section of boardwalk. Should it be determined that the current path through this wetland needs to be avoided then it appears that a short section of a handrail or fence, such as the wrought iron fence

currently installed along the cliff section near Lot 9 (Map U12/Lot 74A), would provide an effective safety barrier.

There are other privately installed improvements within the upland sections of the Surf Side and Atlantic Place right-of-ways (a wooden deck, a granite bench, a garden area enclosed by a wooden fence, stairs, landscape planting bed, and several lawns) that could be avoided and co-exist with a path.

Permitting Considerations

If wetlands are impacted, the project may require local, state, and federal permits respectively be received from the Town of Cape Elizabeth Planning Board, the Maine Department of Environmental Protection (DEP), and the U.S. Army Corps of Engineer (USACE).

Local Level Permitting

All of the wetlands delineated along the Surf Side paper street are RP-2 wetlands as none of them are greater than 1-acre which is a necessary threshold to elevate them to an RP-1 designation. According to the Town of Cape Elizabeth Code Enforcement Officer, Ben McDougal, the local permitting needs will consist of a Resource Protection permit from the Cape Elizabeth Planning Board should any wetlands be directly impacted.

Given that the scope of the project it is a modest recreational trail, it is envisioned based on historical decisions on similar projects that the Planning Board approval would not represent a significant obstacle and could be readily achieved. A May 11, 2017 email from Ben McDougal which outlines the local permitting perspective is included within the appendix of this report. In this email, Ben also confirmed that the Town's Shoreland Zoning regulations would not contain any restrictions that would prevent this trail from being installed nor would there be any further permitting required through the Shoreland Zone.

State Level Permitting

On May 2, 2017, we met at the project site with Audie Arbo of the Maine DEP. We walked the site and reviewed the mapped wetlands within the context of the potential path project parameters. During the field visit, Ms. Arbo was able to confirm the wetlands delineation and provide clarification of the DEP's permitting requirements for this project. A copy of a May 19, 2017 email from the DEP's Audie Arbo is included in the appendix to this report.

Due to the location of the wetlands being within 250-feet of a protected coastal wetland resource, all of the delineated wetlands are considered Wetlands of Special Significance (WOSS) by the Maine DEP under the Natural Resources Protection Act (NRPA). Under NRPA, any direct impacts to these wetlands would technically require an individual NRPA permit. Impacts near these small wetlands would not require a permit as the wetlands do not have any setbacks associated with them. Therefore, a boardwalk near the wetland or the installation of a fence or handrail nearby would not require a DEP permit.

Should there be a need to impact a wetland with a boardwalk crossing, the DEP Staff does have the ability, if requested, to waive a public trail project from an individual permit status down to a minimized Tier 1 permitting level which would be much easier to prepare and process. Given this project's lack of imported fill material, and its very limited environmental disturbance both during construction and during its operational use after construction, it is very likely based on precedence that the DEP would

waive the permitting to a Tier 1 level versus the individual permit level. The Tier 1 permit level is a relatively minor permit and should be readily approved by the DEP.

Federal Level Permitting

In order to assess the permitting for the federal review process, we engaged in email communications with Jay Clement of the USACE. We reviewed the project goals with Mr. Clement so that the permitting needs of the project could be assessed. A copy of Mr. Clement's May 1, 2017 email transmission is included in appendix of this report.

The USACE has jurisdiction on all wetlands. They do not have an adjacency jurisdiction so activities outside of wetland limits which are not actively impacting the wetlands are not regulated by the USACE. Therefore, Jay Clement's advice was to avoid the wetlands altogether which would not trigger a permitting need from the USACE. In addition, if the project were able to span the wetland crossing areas with a boardwalk such as those associated with the small narrow wetland finger in the northeasterly portion of project area then no federal permits would be required.

The USACE regulates common activities in inland wetland areas under its October 2015 Maine General Permit under two levels, Category 1 and Category 2, with Category 1 standards being less demanding. Given the project circumstances, a Category 1 permit would need to be obtained by submitting a Self-Verification Notification Form pursuant to Category 1 of the ASACE's Maine General Permit for any wetland related impacted. Also in past projects, any permitting through the federal program would expose the project to the issues associated with the New England Cottontail Rabbit and the Northern Long Eared Bat being listed as a federally threatened species. Since this path project will not require tree removal and only minimal vegetation removal, it is not believed that these issues would be significant should an USACE permit be determined to be required to install the path.

Other Agency Considerations

There are also agencies within the state and federal permitting process, such as U.S. Fish & Wildlife, Maine Department of Inland Fish & Wildlife (IF&W) and the Maine Historical Preservation Commission (MHPC) that can influence permitting and design issues of projects. If the Maine DEP and the USACE permits are not triggered, these other agencies would not review the potential path improvements. Should the need to permit the path through a state and/or federal permitting program, the limited scope of the path and its minimal associated disturbances would likely not create a significant adverse reaction from these agencies.

Estimated Costs of Permitting and Construction

There are two available options to the Town to implement this path project. We have assumed that no design costs would be associated with either option as the Conservation Committee, contractors, and volunteers have constructed past projects with similar elements without detailed design drawings, details, or specifications.

Option 1

Option 1 would include the installation of boardwalks in two potential locations. Should it be desirable to cross the wetlands by placing sections of boardwalks within them, then the permitting process would become necessary with Town of Cape Elizabeth and Maine DEP permits as described previously being required. The path project may also include Greenbelt Path signage and potentially installing demarcation plantings to better define the path location and limits of the northerly abutting private land

alongside the Surf Side paper street boundary. Based on 2017 costs and as detailed as follows, it is projected that the cost to the Town to implement Option 1 is approximately \$10,000 depending on the nature and extent of the plantings installation.

Construction Cost Estimate – Option 1

Permitting (Town & Maine DEP)	\$2,500	
Plantings (assumed)	\$5,000	
Boardwalk (70 feet @ \$10/Foot)	\$ 700	
Signage	<u>\$ 200</u>	
SUBTOTAL	\$8,400	
Plus 20% Contingency	<u>\$1,680</u>	
TOTAL	\$10,080	Say \$10,000

Option 2

Option 2 would align the path to avoid the wetlands such that no permitting costs would be incurred to establish the path. Again, this option may include the placement of Greenbelt Path signage and potentially installing demarcation plantings to better define the path location and limits of the northerly abutting private land alongside the Surf Side paper street boundary, and the possible installation of a short section of handrail or wrought iron fencing to protect one section of the path from a nearby cliff. Based on 2017 costs and as detailed as follows, it is projected that the cost to the Town to implement Option 2 is approximately \$7,800 depending on the nature and extent of the plantings and fence installation.

Construction Cost Estimate – Option 2

Permitting	\$ 0	
Plantings (assumed)	\$5,000	
Handrail or fence (50 feet @ \$25/Foot)	\$1,250	
Signage	<u>\$ 200</u>	
SUBTOTAL	\$6,450	
Plus 20% Contingency	<u>\$ 1290</u>	
TOTAL	\$ 7,750	Say \$7,800

Conclusions

This report has investigated the feasibility for the Town to establish a path within the existing Surf Side Avenue and Atlantic Place paper street right-of-ways. Sebago has not solicited public feedback on "other practical considerations" as part of this review process. Based on the boundary and existing conditions survey conducted by Sebago along with the wetlands, permitting, and siting evaluations of the path alignment undertaken by Sebago in concert with the Town staff, it appears that such a path would be readily achievable.

Further, should no wetland impacts be undertaken through the development of the path, no permitting ramifications would result for the path establishment under current local, state, and federal regulations.

There are two available options to the Town to implement this path project.

Option 1 would be to install boardwalks in two potential locations. To do so, a Resource Protection Act permit from the Town of Cape Elizabeth Planning Board and a Tier 1 NRPA permit from the Maine DEP permits would be required. Both of these permits would likely be approved by both of these regulatory bodies given their past practices on similar low impact projects. Permitting through the USACE would not be required for boardwalks and would only be necessary if direct fill material was desired to be placed in the wetlands. The cost to the Town to implement Option 1 is approximately \$10,000.

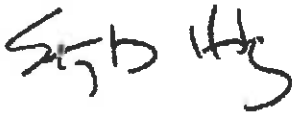
Option 2 would align the path to avoid the wetlands under which no local, state, or federal permits would be required, but a short section of handrail or wrought iron fencing may be desired to protect one isolated section of the path from a nearby cliff. The cost to the Town to implement Option 2 is approximately \$7,800.

Closing

Sebago Technics is very appreciative of the Town's request that we investigate the various aspects of the potential Surf Side Avenue and Atlantic Place paper street path project. Should there be any questions or comments regarding this report, please do not hesitate to contact us.

Sincerely,

SEBAGO TECHNICS, INC.

A handwritten signature in black ink, appearing to read "SDH" followed by a stylized flourish.

Stephen D. Harding, P.E.
Town Engineer

SDH/sdh