



360.92.01

July 13, 2010

Maureen O'Meara, Town Planner  
Town of Cape Elizabeth  
320 Ocean House Road  
P.O. Box 6260  
Cape Elizabeth, Maine 04107

**SUBJECT:** Portland Water District – Southern Cape Pump Station Upgrade  
Resource Protection Permit Review

Dear Maureen:

We have received and reviewed a July 1, 2010 submission package for the subject project. The package included a July 1, 2010 letter addressed to you from Christopher Dwinal of Wright-Pierce with a Resource Protection Permit and supporting documentation. We also met on June 29, 2010 with Jay Hewett, a design engineer from Portland Water District (PWD), to discuss the PWD's proposed project. Based on our meeting with Mr. Hewett, review of submitted material and the project's conformance to the technical requirements of Section 19-8-3, Resource Protection Permit Completeness, of the Zoning Ordinance, we offer the following comments.

1. The applicant, Portland Water District, is proposing to upgrade the Southern Cape Pump Station located on Spurwink Avenue for work such as new sanitary sewerage piping, new pump station equipment, underground electrical conduit, a new utility pole and paving within an RP-1 buffer zone.

We understand that the Board will be conducting a completeness level review of the project at the upcoming Board meeting. We have reviewed the submission requirements and, in our opinion, it appears that the current submission package addresses the submission issues. The remainder of our comments presented below relates to design details beyond the completeness level of review. These comments are included herewith to facilitate future submittals and reviews of the project. It should be noted that additional comments may be forthcoming as more detailed information becomes available and our review of the project continues.

2. The applicant is requesting waivers for wetlands mapping, mapping vegetative cover and conduct soils mapping. We support these waiver requests as the proposed project is an upgrade to an existing system and no wetlands are impacted by this project.
3. The applicant is requesting a waiver for the requirement to prepare a stormwater runoff plan. The improvements to the site represent a relatively minor increase in impervious surface which will result in an insignificant increase in stormwater runoff from the site. This increase is essentially beyond the limitations of commonly applied stormwater modeling and, as such, is not a calculable increase. The proposed surface water will generally sheet flow into the RP-1 buffer, which is owned and controlled by the Town, before it flows into the tidally influenced marsh area. Therefore, we support the waiver request of formal stormwater runoff calculations and plan.

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Maureen O'Meara

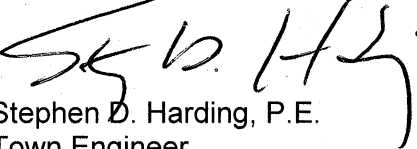
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4. To prevent confusion during construction, the designer should reference Maine Department of Transportation (MDOT) specifications for the aggregate materials depicted on the Driveway & Walkway Pavement detail and the Typical Section of Gravel Areas detail.
  
5. In reviewing the plan to the Cape Elizabeth RP-1 Buffer plan in Appendix E, it appears that the "upland wetland boundary" line on the west side of the pump station is mislabeled as "250' Resource Protection Buffer Zone". Assuming this correction, a portion of the proposed activity will take place within 75 feet of the wetland which would technically trigger Maine Department of Environmental Protection (DEP) Natural Resource Protection Act (NRPA) permitting. Although this activity appears that it may trigger an NRPA permit, we believe that an abbreviated Permit-by-Rule (PBR) filing could be made. As the DEP is generally much more concerned with proposed construction within 25 feet of a wetland resource, we believe that the PBR approval would not likely be difficult for the applicant to receive. The designer of the project should review the proposed activity with the DEP to determine if a permit is necessary and, if so, provide the Planning Department with a copy of the application and/or approval for the Town's records.

We trust that these comments will assist the Board during their deliberations on this project. Should there be any questions or comments regarding our review, please do not hesitate to contact us.

Sincerely,  
AMEC Earth & Environmental, Inc



Stephen D. Harding, P.E.  
Town Engineer

SDH:lap

cc: Bob Malley, Public Works Director  
Andrew Masella, AMEC Earth & Environmental, Inc  
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