



July 24, 2018

Nell Donaldson, Senior Planner  
City of Portland Planning Division  
389 Congress Street  
Portland, ME 04101

Re: MMC Staff Parking Garage | 222 St. John Street | Level III Site Plan  
Response to Public Comments

Dear Nell:

Thank you for coordinating the review of the Maine Medical Center Parking Garage project located at 222 St. John Street. This letter provides a summation of our responses to the comments received from various reviewers as part of the Level III Site Plan process. We have repeated the original comment in italics below, and our response follows each.

**Comment from John Peverada, City Parking Manager Dated June 27, 2018**

*With the size of the garage, will the two exit lanes onto St. John Street be sufficient to "empty" the garage in a reasonable amount of time? When they City boots MMC employees they say that they do not park in the existing garage because it takes too long to exit. Additionally, some employees who should currently be parking in the shuttle lot now say they don't because it takes too much time out of their day and they are not being paid while on the shuttle bus.*

*The hospital has staggered shifts, but there is concern that if this garage is not efficient, employees will park on the neighboring streets and the City will be chasing them around. Keeping in mind that St. John St only has one travel lane in each direction, there is concern that traffic may back up in the garage. MMC had discussed a second exit onto the Fore River Parkway, why is that not included in this plan?*

**Response:**

The Gorrill Palmer traffic memo submitted to the City indicated a high level of service for the proposed entry/exit of the garage and the St John St intersection.

The entry and exit experience in the proposed employee garage will be different than the experience in the existing employee garage. The proposed garage's primary access point is from a signalized intersection on St John St - a commercial street. The existing garage's primary access point is from an unsignalized intersection on Gilman St – a residential street. In addition, much of the existing garage traffic desires a left turn onto Congress St from Gilman St – an unsignalized intersection.

A feasibility study of the options to connect the garage to the Fore River Parkway is included in the application.

**Comment letter from City of Portland Fire Department Dated July 05, 2018**

1. *The Street Address shall be marked on the structure with Arabic numerals, rather than spelled out.*

**Response:** Comment acknowledged, street address will be marked on structure with Arabic numerals, additional details will be provided during the building permit application process.

2. *A private fire hydrant will be required along the right side of the building, accessible from the lower parking lot.*

**Response:** A private hydrant has been proposed adjacent to the garage entrance accessible from the lower parking lot. Please refer to the attached revised design drawings for the updated hydrant location.

3. *Please indicate the location of the sprinkler system fire department connection.*

**Response:** No sprinklers are currently proposed within the garage; the garage will utilize a standpipe system. The location of standpipes and fire department connections are shown on the attached revised design drawings.

4. *There are sufficient public fire hydrants in the area, no additional public hydrants are required.*

**Response:** Acknowledged. As stated above, a private hydrant has been provided adjacent to the garage entrance accessible from the lower parking lot. Please refer to the attached revised design drawings for the updated hydrant location.

5. *Fire department access shall have an unobstructed vertical clearance of not less than 13 ft 6 in, to include the width of the St. John Street side access.*

**Response:** Comment acknowledged, unobstructed vertical clearance has been provided along the St. John Street access.

6. *The area in front of the building, St. John Street side must be capable of supporting 20 ton.*

**Response:** The proposed checker block has the capacity to support an HS-20 load rating. Please see the attached "Checker Block Technical Note Traffic Loading Calculation Example" provided by the manufacturer for documentation supporting the HS-20 loading capacity of the checkerboard pavers.

7. *The main entrance of the building must be the address for the building. The address for this building will be 190 St. John Street.*

**Response:** Comment acknowledged.

#### **Comment letter from Wright-Pierce Comment Dated July 02, 2018**

1. *Level III Site Plan applications with the City of Portland must submit a stormwater plan pursuant to the regulations of MaineDEP Chapter 500 Stormwater Management Rules. This includes conformance with the Basic, General, and Flooding Standards (Ref: Technical Manual, Section 5. II. Applicability in Portland. C. a.; and Ref: City of Portland Code of Ordinances Sec. 14-526. Site Plan Standards, (b). 3. b.)*

- a. *Basic Standard: Project Plans and Application should be provided to address erosion and sedimentation requirements, inspection and maintenance requirements, and good housekeeping practices in accordance with MaineDEP Chapter 500, Appendix A, B, and C. The applicant has provided information that the project will be subject to the Basic Standard. The applicant has provided:*

- i. *An Erosion and Sedimentation Control Plan in Section 12 of the application.*

- ii. *Inspection and Maintenance information in Section 12 of the application.*

- iii. *Erosion and Sedimentation Control Details and Notes on Sheet C-200.*
- iv. *Location of Erosion and Sedimentation Control best practices were observed on the Demolition Plan.*

**Response:** Comment acknowledged.

*The proposed project meets the Basic Standards*

b. *General Standard: The applicant has provided information regarding the size and scope of the project indicating that the project is subject to the Redevelopment Standard within the City of Portland, which is more stringent than the Chapter 500 requirements for redevelopment. The City requirements indicate that greater than 50% of the proposed impervious surfaces must receive stormwater quality treatment pursuant to the MaineDEP Chapter 500 requirements. The applicant has provided information that 85% of the facility impervious surfaces are conveyed to a Jellyfish Filter, a proprietary unit from Contech. The applicant shall clarify the following and provide responses:*

i. *The HydroCAD Subcatchments report a total drainage area of 157,512 SF conveyed to the stormwater treatment unit. These values match values reported in Table 12-1, but differ slightly from the calculations provided on Section 12, Page 13. The correct tributary area and required treatment volume to the proprietary unit shall be confirmed by the applicant.*

**Response:** The proposed site design has been modified slightly since the prior submission which has impacted the above referenced area. Section 12 of the Level III Site plan Narrative has been revised and attached with this letter; please refer to this section for additional clarification.

ii. *The MaineDEP approval letter dated January 21, 2015 for the Jellyfish Filter require manufacturer approval for each design, as noted in item 7 of this letter (page 14 of Section 12). This letter shall be provided as part of the application.*

**Response:** A letter from Contech has been requested for design approval and will be forwarded for review upon receipt.

iii. *The applicant will be required to inspect, maintain, and report on the filter in accordance with Chapter 32 stormwater requirements. The applicant has provided inspection, maintenance, and housekeeping information in Section 12 of the application. A stormwater maintenance agreement is required for the stormwater treatment units.*

**Response:** A stormwater maintenance agreement will be provided to the City upon approval of the Level III Site Plan Application.

c. *Flooding Standard: The applicant has provided information indicating that the total amount of impervious surface at the facility is being decreased. For this and additional supporting information provided in the application, the applicant is not required to meet the Flooding Standard of Chapter 500.*

**Response:** Comment acknowledged.

2. *Connection to Existing System:*

a. *The existing facility currently discharges to an 18" private storm drain. The proposed condition includes retaining surface runoff in order to allow runoff from a 25-year, 24-hour rain event to pass an 18" pipe. Flows from the East Stormdrain are proposed to connect to the existing 30" pipe in St. John Street. The applicant shall provide the following:*

i. *The applicant has indicated that the existing 18" pipe can convey 20.81 CFS at 95% capacity. A calculation was not provided in section 12 of the application, and this value was not observed in the HydroCAD output. The applicant shall provide a calculation for this flow rate. Once provided, this is anticipated to confirm that the project is in conformance with City of Portland Code of Ordinances section 14-526 (b) 3.a subsection ii regarding downstream private drainage.*

**Response:** During review it was discovered that the 20.81 CFS previously reported at 95% capacity was misreported and did not account for the appropriate slope for Pipe 25. This calculation has been revised to reflect the proposed slope for Pipe 25, the revised 95% capacity conveyance is 9.31 CFS. Utilizing strictly the Manning's Equation for the single pipe, the proposed 18" pipe can adequately convey the 10-year storm without backflow within the system. It is important to note that the HydroCAD model utilizes dynamic routing which takes into account possible backflow within the system during larger storm events. Although the 25-year storm event generates flows in exceedance of the Manning's Equation calculations, the HydroCAD model shows that there is an excess of 1-foot of freeboard within DMH-2 during this storm event, and flood elevations are not exceeded at any upstream structures within the system.

ii. *The applicant has indicated that conversations with the City have discussed the 30" stormdrain in St. John Street has capacity to receive additional flows from the project. The applicant shall provide written or e-mail confirmation from the Department of Public Works that this work is being completed in accordance with City of Portland Code of Ordinances section 14-526 (b) 3.a, subsection iii iv.*

**Response:** Woodard & Curran has discussed discharging stormwater flow from the garage entrance to the 30" stormdrain located in St. John Street. Please see attached correspondence with the City of Portland Public Works Department.

### 3. *Proposed Drainage Design*

a. *More information is needed to confirm that the pipe capacity and inlet capacity is adequate for each structure and pipe length.*

**Response:** To provide a conservative assessment of inlet flows and pipe conveyance capacity, an analysis of the project's largest subcatchment area has been conducted including pipe and inlet capacities. Flows generated at CB-2 were evaluated using HydroCAD analysis for the subcatchment area, a flow of 1.15 cfs is generated during the 25-year storm event. The Manning's Equation was utilized to determine the 95% capacity for Pipe 2 and was calculated to be 2.17 cfs. The proposed catch basin will utilize a standard 24 inch inlet grate with a capacity of 3.50 cfs.

All other subcatchment areas are of a similar or smaller area and utilize the same or larger pipe sizes, and as such were not analyzed. Please refer to the attached calculations for further clarification.

b. *Additional data/detailing is needed to confirm that the R-Tank system and Jellyfish Filter are designed in consonance with the HydroCAD model.*

**Response:** Pond 1P within the HydroCAD model utilizes information provided by both ACF Environmental and Contech. ACF Environmental provided a HydroCAD node for the R-Tank storage volume, and Contech Provided a HydroCAD node with the appropriate outlet information to ensure that flows routed to the Jellyfish Filter will meet the required cartridge flow rate design criteria.

c. *CB21 on sheet C-103 calls out a 15" pipe out of the structure, but the existing pipe between CB21 and the existing CB is referenced as 18". Please confirm the existing pipe is indeed an 18" pipe.*

**Response:** The correct pipe size has been updated, please refer to the attached revised design drawings for additional clarification.

d. *Pipe 22 has 0.0% slope. Confirm this is the intended design or if the pipe should be sloped to the JellyFish Filter.*

**Response:** Pipe 22 was designed with a 0.0% slope to the Jellyfish filter per Contech recommendations.

e. *CB12 has 1.37 feet of drop between the in and out inverts. Confirms this is the intended design or if the standard 0.1-foot drop is more appropriate.*

**Response:** Due to the large grade change from CB14 to CB11, a drop of 1.37-feet between inlet and outlet within CB12 was selected.

f. *The areas presented in the Water Quality Volume for Jellyfish Filter System calculations do not match those presented in Table 12-1 (see comment 1.b.i of this response). Please remedy.*

**Response:** Please refer to comment 1.b.i of this response letter, Water Quality Volumes have been revised and are further described within the attached revised Section 12 of the Level III Site plan Narrative.

g. *The HydroCAD output files reference 24-hour design rainfall amount of 3.1", 4.6" and 5.8" for the 2-, 10-, and 25-years events, respectively. Please provide the source of the rainfall amounts for review.*

**Response:** Rainfall amounts were taken from Appendix H of Maine DEP Chapter 500 and selected from South East Cumberland County.

#### 4. *Capacity to Serve:*

a. *The applicant has sent Capacity to Serve Letters to Utilities. Responses to these letters are required parts of the application, and the applicant has indicated that they will be provided to the City as these letters are received.*

**Response:** Woodard & Curran has contacted utilities regarding status of capacity to serve the proposed parking garage, which are being reviewed at this time. Capacity to serve letters will be forwarded upon receipt.

#### 5. *Parking Garage Drainage:*

- a. *Additional information is requested on where the floor drains from the parking garage convey surface flows. Please confirm that the surface flows from the parking garage's interior levels are conveyed into the oil/water separator on Sheet C-104, and then ultimately into the sanitary sewer. Please provide a detail for the oil/water separator or indicate which sheet this detail may be located on.*

**Response:** The open top deck of the parking garage drains into the stormwater detention system, all other floors below the top deck are conveyed towards the oil water separator shown on Sheet C-105 and detailed on Sheet C-201 of the attached revised design drawings.

6. *StormBasin Facility:*

- a. *The StormBasin facility will provide a level of hydrocarbon removal, and removal of other pollutants from surfaces that convey surface drainage towards St. John Street. It is understood that this proprietary unit is currently not accepted as a stormwater treatment method under MaineDEP Chapter 500, but the applicant has provided information that Jellyfish Filter contains ample treatment volume to meet the City's Redevelopment Standard.*

**Response:** Comment acknowledged.

7. *Soils:*

- a. *Web Soil Survey information was provided in Section 12 of the application. The information in the web soil survey was in consonance with the soil hydraulics ratings for the HydroCAD report.*

**Response:** Comment acknowledged.

- b. *Section 15 of the application notes that soils were observed to have potential ash substances, and that urban infill may be likely due to the location of the project. The applicant has noted in section 15 that a soil management plan will be provided. Final site grading will be reviewed after this soil management plan is available.*

**Response:** Comment has been addressed, please refer to email from Wright Pierce dated July 16, 2018.

8. *Snow Storage:*

- a. *The applicant has noted in Section 17 of the application that snow storage will be completed through means of removal and off-site storage. Snow melters will be located on the open-deck roof to the garage. It is understood that the exposed portion of the roof conveys flows to the Jellyfish Filter.*

**Response:** Comment acknowledged.

9. *Details have been provided confirming the following storm drain infrastructure items that are in conformance with the City Standard Details and Technical Manual:*

- a. *Catch Basin detail (3' sump)*
- b. *Manhole Frame, Cover*
- c. *Catch Basin Frame Cover*
- d. *Manhole, Manhole Steps*
- e. *Casco Trap*

**Response:** Comment acknowledged.

10. The following notes are provided for certain details:

a. *Sheet 17: St. John Street and D Street Intersection*

i. *Catch Basin at intersection of D Street and St. John St. is located in a transition ramp next to flat curb. Applicant shall provide spot grades or detail confirming how this catch basin grate shall be constructed with the adjacent tipdown curbing, and within a bicycle lane.*

**Response:** Notes have been added to the design drawings to confirm the intent of the catch basin grate modification. Please refer the to the attached design drawings for further clarification.

b. *Sheet 17: Checker Block Concrete Grid Detail:*

i. *Discussion from reviewers indicated concern over winter maintenance and proposed use of this material. From review of sheet C-106, it is apparent that the Checker Block system is anticipated to be used for fire access and maintenance access, and not for stormwater treatment. It is suggested that applicant confirm the use of this material and the entry curb is confirmed as acceptable with the City Fire Department. The applicant shall submit maintenance and housekeeping information on the Checker Block system to indicate how the system will be maintained in both the summer and snow/salt conditions.*

**Response:** Additional maintenance information has been provided with this response to comment letter, please see attached maintenance requirements.

## **Comment letter from Planning Department Dated July 02, 2018**

### **Zoning Analysis**

1. *Proposed sign does not match others on campus per sign plan submitted in 2008. In the final submittal, provide an explanation as to why the design diverges from the sign plan.*

**Response:** A signage plan that updates all MMC signs will be submitted with the site plan application for the Congress St. hospital building.

2. *Continued concern re likely success of some TDM measures and data collection. Wait on hiring of TDM coordinator to finalize TDM plan.*

**Response:** Comment acknowledged. The TDM coordinator position was filled on Monday July 16<sup>th</sup>. The TDM coordinator is in the process of familiarizing himself with MMC's plan. MMC has plans to meet with City reviewers on Wednesday July 25<sup>th</sup> to review the TDM plan.

3. *Campus-wide Parking analysis in IDP, GP's memo, and TDM plan do not entirely match. GP's memo cites a projected deficit of 500-600 spaces. This figure does not appear in the IDP, and doesn't mesh with employee growth figures from the IDP (approximately 300 new employees by 2026?). A table with ratios and existing and projected demands would be helpful.*

**Response:** Page 66 of the IDP states "...MMC estimates a need for 500-600 additional staff/physician parking spaces to accommodate future demands and resolve the existing parking shortage." Page 65 of the IDP states "The hospital requires about 150-200 additional on-campus parking spaces to alleviate current 2017 staff parking shortfalls." GP's cited projected deficit of 500-

600 spaces includes the current deficit of 150-200 spaces. The projected deficit accounts for addressing the current parking deficit, new employees, and a reduction in parking demand through TDM measures.

4. *CMP should include some discussion of methods to mitigate impacts to 210 St. John, particularly given location of construction access. Also speak directly to concerns about loss of landscaping there.*

**Response:** Comment acknowledged. MMC and its design team are scheduled to meet with the property owner of 210 St John St for a site walk-through to develop a mitigation plan on July 26, 2018.

5. *Need construction easements on Union Station Plaza lot. These will be required prior to building permit.*

**Response:** A construction agreement will be obtained prior to requesting a building permit.

6. *Speak to timing of deliveries (i.e. June meeting, we discussed loading during off-peak hours).*

**Response:** construction of the garage will require careful planning and management of the daily occurrences within the site limits. The logistical plan that is currently outlined is intended to keep all construction staging, laydown and temporary storage within the project limits and secured by temporary fencing. With designated areas delegated to subcontractors the site will remain accessible by incoming trucks without causing a queuing affect outside of the fence. A secondary storage yard is anticipated near the project site to store precast material not accommodated on site. The usage of this area will help to better control and manage the truck traffic to and from the site during the day, as nighttime truck use is prohibited by Maine. Precast trailers will only transport loads between the staging yard and the job site outside of peak traffic hours as defined by Gorrill Palmer as 7:30am – 8:30am and 4:00pm – 5:00pm.

7. *Finalize plan for temporary parking for displaced employees.*

**Response:** The Eagles parking needs will need to be addressed and managed throughout construction. During the construction process, MMC will provide 37 parking accommodations for the members of the Eagles. Tenants of 222 St John St will receive temporary parking adjacent to the building and in a lot located across St. John St. MMC is committed to providing safe and proximate parking for these properties throughout the construction process.

8. *Clarify which three spaces are being taken on St. John Street during construction (figures conflict).*

**Response:** During Phase 1, the primary entrance for sitework, concrete and precast deliveries will be through a paved right-of-way at the existing Eagles parking lot. Trucks will then exit the job site through the North gate accessing St. John St via the Union Plaza parking lot. A flagger will be employed to assist in navigating precast loads off St. John to the project site.

Phase 2 will begin once the garage has been 50% erected. The access through the Eagles lot will become blocked by the building diverting all deliveries through the North gate via the Union Station Plaza ROW.

Three on street parking spaces will likely need to be closed to public use for the large trucks to gain access to the project site during Phase 1 & Phase 2. However, the location of these closed parking spaces will change with the phases.



By utilizing the secondary storage area for large deliveries, we can coordinate material deliveries to the site during non-peak hours of traffic or pedestrian presence. Large deliveries will queue at the storage yard located on Commercial St, until the appropriate time is determined to bring the material to the project site for installation.

9. *Ped detour plan should include a temporary crosswalk at 210?*

**Response:** Included in the attached, updated CM Plan

10. *Provide more detail on how the public will be apprised of construction updates.*

**Response:** Quarterly reporting and updating of the CMP will be required to update the City and community of the following activities:

- 1) Construction schedule updates
- 2) Material deliveries, including notice of any oversized loads that may impact public traffic
- 3) Requests for upcoming off-hours work including weekends and holidays
- 4) Notice of any upcoming activities that may produce strong noise, vibration or dust that could adversely affect the neighboring communities.
- 5) Requests for any street openings or public sidewalk work to be completed as part of the construction contract

Additionally, MMC will provide updates via their project website. Inquiries about construction, logistics, schedule and safety will be specifically addressed on the website along with the contact information for individuals associated with each aspect of the project. Neighborhood outreach events will be scheduled at each major phase/milestone where changes to pedestrian or vehicular traffic patterns occur.

11. *Provide more information on how snow ban parking will be managed.*

**Response:** MMC will continue with established policies that allow for snow ban parking in its parking structures.

### **Site Plan Review**

1. *Waiting on confirmation that MaineDOT agrees to the installation of traffic signal (GP was making initial contact)*

**Response:** Email response from Steve Landry of MaineDOT on July 9<sup>th</sup>, 2018 stated: "We would entertain the installation of the signal, only with you knowing it can't be turned on until you show it meets the signal warrants." We look forward to working with the City of Portland to work towards operationalizing the signal when the garage opens.

2. *Intersection Design:*

- a. *Further discussion on the design of bike lane pending- need to confirm best practice for avoiding southbound right turn/bike conflicts.*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming.

- b. *See bike lane paint specs here: <https://www.transpo.com/roads-highways/materials/pavement-marking-material/color-safe-bike-lanes>*

**Response:** Comment acknowledged

- c. *Include elevation of pedestrian connections through Western Promenade. There is evidence of desire lines off the formal path network. Could these be formalized? If so,*

*lighting or additional safety measures (e.g. call boxes?) may be necessary. Any new lighting or paths would need to be approved by HP.*

**Response:** An assessment of the Valley Street Trail has been conducted, additional comments from the City of Portland July 20, 2018 requested additional evaluation. A final Valley Street Assessment will be provided once complete.

3. *Technically, not required to provide a facility under site plan review, as the nearest pullout is less than a quarter of a mile north. However, there is an existing METRO stop in front of the Eagles lot. How will this stop be handled?*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming.

*Note that METRO is working to install a shelter facility on Congress at the north end of Union Station Plaza.*

**Response:** Comment acknowledged.

4. *See notes on parking analysis above.*

**Response:** Comment acknowledged. See response above.

5. *Support partial waiver on bike parking. However, bike parking location (in off-corners of the ground level garage) should be reevaluated. Is there a more accessible location closer to the entrances?*

**Response:** Additional bike parking has been provided at the lobby entrance along St. John Street to address this comment and design comments. Please refer to the attached revised design drawings for locations.

In addition, MMC is currently assessing all of its bike parking facilities on the Bramhall Campus.

6. *Add notes to planting plan regarding treatment of 210 St. John buffer. It is our understanding that existing arborvitae in this area will be replaced if damaged during construction. This (or any alternative plan for this area) should be noted.*

**Response:** The mature arborvitae hedge along the property line boarding the south boundary of 210 St. John Street will be protected during construction. If damage to the plants occur, the plants will be replaced.

7. *Clarify which fence detail goes in which location.*

**Response:** Additional clarification notes have been added to the attached revised design drawings.

8. *Maybe more comments re viability of checkerboard pavers in utility access area.*

**Response:** Please see the attached "Checker Block Technical Note Traffic Loading Calculation Example" for documentation supporting the H-20 loading capacity of the checkerboard pavers.

9. *Provide screening for transformer and generator on front of building.*

**Response:** Area of transformer and generator will be naturally screened from the roadway via, mounded landscaping berms.

10. *Need street trees on D Street, as possible*

**Response:** Comment acknowledged. MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming.

11. *Continued concern re CPTED around site. Evaluate for additional opportunities for natural surveillance/ territorial reinforcement. Expand entrance? Bring security from with windows to grade level?*

**Response:** Windows have been added to the mechanical room on the first floor of the garage facing St John St, the canopy has been expanded, and bike racks have been added. See revised design drawings.

12. *Need capacity to serve letters*

**Response:** Woodard & Curran has contacted utilities regarding capacity to serve the proposed parking garage. Capacity to serve letters will be forwarded upon receipt.

13. *Revise dumpster enclosure to wood*

**Response:** It is our recommendation that the dumpster enclosure remain as previously proposed. Given the location and use of the site and surrounding areas, a black polyvinyl coated chain link fence with vertical privacy slats will provide a longer service life. A wood enclosure would be too easily damaged by truck traffic.

14. *Provide capacity to serve letters upon receipt.*

**Response:** Woodard & Curran has contacted utilities regarding capacity to serve the proposed parking garage. Capacity to serve letters will be forwarded upon receipt.

15. *Need waiver request for average illumination levels*

**Response:** The roof deck parking lot lighting has been intentionally limited to the center of the garage to minimize the visual impact from off-site. To meet IESNA safety standards for minimum illuminance of 0.5 footcandles the design solution results in a maximum illuminance level of 6.4 footcandles, and an average of 2.4 footcandles. We could have met the Portland standard if we had located lighting poles around the perimeter of the garage deck, but we did not feel that was appropriate.

Similarly, the north parking lot lighting poles have been kept to the center of the parking lot to avoid unacceptable levels of light trespass across the west property line which is immediately adjacent to the north parking lot boundary. To meet the IESNA safety standards for minimum illuminance of 0.5 footcandles the design solution results in an average of 1.9 footcandles.

Furthermore, the Portland lighting standards do not coincide with lighting IESNA recommendations for street intersections. The intersection of St. John Street and D Street, and the intersection of St. John Street and C Street require an average illuminance of at least 2.1 footcandles (based on a "collector" street and "local" street intersection with high pedestrian activity). Accordingly, the design solution for the St. John/D Street intersection results in an average of 2.2 footcandles, and the St. John/C Street intersection results in an average of 2.1 footcandles.

16. *Is there an opportunity to dim or turn off lights at night when use will be down?*

**Response:** The roof deck lighting will be controlled both by photocell and time/motion control. The photocell will allow the lights to operate only after dark. The time/motion control will restrict the

operation of the roof deck lighting by means of motion control in the hours after 10:00 pm until 5:00 am. The motion sensors will be located at the ramp leading up to the roof deck, as well as at the stairwells at the roof deck level.

*Concern re visibility of rooftop lights from western prom. Can top deck be closed down at night and these lights be shutoff?*

**Response:** MMC will install a timer and motion sensor system to the roof lighting system.

*17. As noted above, may need lighting within Western Prom. Further info on this pending evaluation noted above.*

**Response:** An assessment of the Valley Street Trail has been conducted, additional comments from the City of Portland July 20, 2018 requested additional evaluation. A final Valley Street Assessment will be provided once complete.

*18. Can material samples be provided for Planning Board*

**Response:** The design team is currently working on a palette of materials to share with the Planning Board and City Staff.

*19. Right Title and Interest*

*a. Need Exhibit A of Eagles Purchase & Sale:*

**Response:** See the attached, recorded deed for this property which should satisfy RTI.

*b. Need evidence of rights to make improvements to 222. St. John and to Union Plaza lot*

**Response:** Refer to Easements contained in Section 7 of the Site Plan Application, granting rights for improvements associated with access and drainage on Union Plaza land.

*c. Need evidence of easement across Union Station Plaza for stormwater & access*

**Response:** Refer to Easements contained in Section 7 of the Site Plan Application, granting rights for improvements associated with access and drainage on Union Plaza land.

*d. Confirm that we have evidence of stormwater infrastructure easements with 222 St. John pursuant to lot split. Is there a figure showing this & the access easement?*

**Response:** The two properties are managed by a common entity that has ownership of both parcels, and that has leased the properties to Maine Medical Center under a 50 year lease. The lease agreements for these properties are attached.

*e. Need construction easements on Union Station Plaza lot. These will be required prior to building permit*

**Response:** Right of entry / construction agreements will be established for the adjacent properties prior to the start of construction.

**Comment letter from Jeremiah Bartlett, Traffic Systems Engineer Dated July 05, 2018**

**Sheet C-100**

*1. Additional detail shall be provided for pavement markings providing direction for cyclists through the proposed signalized intersection at the garage entrance, which could include skip markings, green paint, and other components. The approved plan will coordinate with DPW on the appropriate marking materials for this location.*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming.

2. *The traffic signal proposed for the garage entrance, upon completion, shall be capable of bicycle and pedestrian detection.*

**Response:** Comment acknowledged, the signal will be capable of bicycle and pedestrian detection.

#### **Sheet C-107**

1. *The proposed sidewalk facility on the north side of D Street shall be placed as close to the right-of-way as possible and provide the maximum width without reducing the street to less than 36 feet in width.*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming on recommendations for layout of D Street.

2. *To adequately define the street and replace on-street parking being eliminated by the proposed intersection reconfiguration with St. John Street and the primary garage entrance, curbing should be placed on the south of D Street with existing driveways brought as close into conformance as possible. This would facility a future City sidewalk project in keeping with the original 1928 layout plans for D Street.*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming on recommendations for layout of D Street.

3. *The new crossing configuration of D Street, including islands and curb ramps shall consider either a payment upfront to facilitate the changes on a imminent MaineDOT paving project of Valley Street*

**Response:** Comment acknowledged. MMC has reached out to the project contact at MaineDOT, and is working to coordinate these improvements.

#### **Comment letter from TYLIN International Traffic Dated July 05, 2018**

1. *The parking garage has a number of spaces that do not meet the City's dimensional standards for size. The applicant should request a formal waiver with supporting documentation.*

**Response:** A waiver has been requested within the attached waiver request form.

2. *The garage plans should include dimensions for parking aisle widths.*

**Response:** Revised plans include additional dimensions.

3. *A traffic signal is proposed at the St. John street/D Street/Garage Driveway location. I support the installation of a traffic signal given vehicle volume conditions and anticipate pedestrian movements. I would note that the applicants responsible for the development of design plans and equipment specifications for review and approval by the City. All costs associated with the installation of the traffic signal is the responsibility of the applicant.*

**Response:** Comment acknowledged.

4. *The general layout of the St. John Street/D Street/ Garage Driveway intersection is generally acceptable. It should be noted that the City is currently reviewing bicycle facility*

recommendations and final direction will be provided in the future. Some initial comments are provided below:

- a. *The number of pavement marking arrows is excessive and should meet either City or MaineDOT Standards (they may be for traffic flow reasons). I would suggest the through lane arrows be eliminated on St. John Street.*

**Response:** Pavement markings have been reduced, please see the attached revised design drawings for updated pavement markings.

- b. *A crosswalk on the St. John Street southerly approach shall be provided.*

**Response:** An additional crosswalk has been added on the southerly approach on St. John Street. Please see the attached revised drawing set.

- c. *I continue to review the garage approach as it relates to providing a three-lane section with a reversible center lane and traffic control design elements.*

**Response:** MMC needs clarification regarding the cause for continuing review.

5. *The applicant has provided a traffic evaluation and my initial comments are noted below:*

- a. *I have requested the Synchro traffic model for review.*

**Response:** Synchro traffic models have been to City staff for review on July 6, 2018.

- b. *I have requested the traffic count data collection report for review.*

**Response:** Traffic counts have been sent to City staff for review on July 6, 2018 and a copy of the email only has been attached within the comment response letter for reference.

- c. *I find the methods used to estimate traffic volumes associated with the garage to be reasonable. I would note that additional review is required. The evaluation notes that a broader review of the area transportation system and parking garage will occur during Phase 3 of MMC's expansion.*

**Response:** Comment acknowledged.

- d. *From a vehicle capacity perspective, I would recommend a shared through/right shared lane configuration on the southbound St. John Street approach.*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming.

- e. *Some of the intersection level of service conclusions seem better than actual field conditions. I would suggest the applicant field confirm intersection delays and queues.*

**Response:** This comment was discussed in more detail with Mr. Errico on July 23, 2018. As discussed with Mr. Errico, the most significant perceived difference in level of service between the analysis and experience in the field is during the AM peak hour. The forecast AM peak hour of the garage occurs between 6:00-7:00 AM when the trip generation is forecast to be 1097 trip ends. Adjacent street traffic is minimal at this time of the morning. The garage is only expected to generate 556 trip ends (almost half) during the AM peak hour of the adjacent roadway network which occurs approximately between 7:30-8:30 AM. Since the garage peaks well before the adjacent street traffic, the levels of service are better than when commuter traffic creates congestion. In addition, specific to the intersection of St. John / Congress, there is currently an exclusive pedestrian phase that significantly decreases the capacity of the intersection when actuated by pedestrians. This exclusive pedestrian phase has previously

been identified by Gorrill Palmer to change to concurrent pedestrian phasing as part of the garage project, thus significantly improving the intersection level of service from existing conditions. It should be noted that the intersections in the immediate area will also be reevaluated in Phase 3 of the MMC expansion when a Traffic Movement Permit will be required.

6. *The applicant should provide information on the provisions of temporary parking conditions for both MMC and 222 St. John Street during construction activities.*

**Response:** MMC parkers will be relocated to the Gateway garage and shuttled to campus during the construction process. 222 St John St parkers will utilize the surface parking lot on the east side of St John St and portions of the rear surface parking lot.

7. *The sidewalk from St. John Street to the rear of 222 St. John Street should be ADA compliant and continuous.*

**Response:** The sidewalk in this location has been revised to provide a continuous sidewalk, while maintaining existing slopes adjacent to the existing entrance drive. Please refer to attached revised design drawings.

8. *The applicant should provide a parking analysis for the parking demand and supply conditions for 222 St. John Street.*

**Response:** A utilization analysis of parking behind 222 St John St is attached within this submission packet.

9. *I would suggest a crosswalk be provided across the 222 St. John Street driveway.*

**Response:** A crosswalk has been added in this location, please refer to the attached revised design drawings.

10. *The median refuge island on Valley Street needs to be a minimum width of 6-feet to meet ADA requirements. The ramp configuration on the west side should be revised to eliminate the flare condition. Warning signs may be required, and direction will be provided in the future.*

**Response:** Comment acknowledged, MMC will coordinate with the City of Portland and MaineDOT on final design details.

#### **Comment letter from Bruce Hyman Transportation Program Manager Dated July 05, 2018**

##### **Site Layout and Materials Plan 1 (Sheet C-100)**

1. *City Staff are reviewing various bikeway/roadway configuration, pavement marking and signage along the St. John Street frontage to provide the best bikeway given the high prevalence of right turns on the southbound St. John St. into the parking garage.*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming.

2. *The walkway along the driveway from the garage/Eagles building should provide a full usable width of 5' exclusive of the lighting poles/fixtures. The sidewalk should be widened or the poles moved out of the sidewalk.*

**Response:** The proposed sidewalk has been widened to provide a minimum of 5' width. Please refer to the attached revised design drawings.

3. *The sidewalk proposed along D St should have a wider effective/usable width given the likely location of the lighting poles within the sidewalk and the potential for moderate to high numbers of pedestrians using the sidewalk (6.5' is too narrow).*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming for the layout of D Street.

4. *Consideration should be given to curb the south side of D St as well to establish a standard width street of approximately 38' curb to curb to better organize its likely increased use and accommodate a future sidewalk.*

**Response:** The proposed D Street improvements have been revised to show a 36' curb to curb dimension as previously discussed with City Staff. Please refer to the attached revised design drawings. We anticipate additional changes to D Street based on comments received from the City on July 20<sup>th</sup>.

5. *The curb ramps at the NE and NW corners of the entrance/exit and D St may need to be reconfigured and may not be as large as shown (potentially reduce the length of flush curb and detectable warning panels).*

**Response:** The curb ramps in this location have been revised, please see the attached revised design drawings.

6. *Consideration should be given to provide a 4<sup>th</sup> crosswalk at the intersection with D St/ garage entrance-exit.*

**Response:** A fourth crosswalk has been added, please see the attached revised design drawings.

7. *It is unclear whether the plans for D St. account for the two driveways that currently exist today on the north side.*

**Response:** The two existing driveways have been accounted for within the D Street upgrades. Please see the attached revised design drawings.

8. *The curb ramp on the west side of Valley Street at D street may warrant a different configuration that does not use a flare- the proposed configuration is less traversable by those with disabilities.*

**Response:** MMC received additional comments from the City of Portland on July 20, 2018 stating that additional information is forthcoming.

9. *Valley Street will be under moratorium later this year it is paved via a MaineDOT project and the timing and impact of the construction of the proposed pedestrian crossing (ramp, refuge island) need to be considered.*

**Response:** Comment acknowledged. MMC has reached out to MaineDOT's project manager, as requested by the City, to coordinate project improvements.

10. *The pavement markings and labels for the reversible center lane for the garage exit/entrance are to be revised to be clearer.*



**Response:** Pavement markings and labels have been revised, please see attached revised design drawings.

11. *The driveway, as shown, does not conform to the Technical Manuals Sidewalk Material Policy- it is to be brick.*

**Response:** The driveway has been modified to show a brick apron, please refer to the attached design drawings. MMC continues to have concerns about the durability of a brick apron in this location.

#### **Site Layout and Materials Plan 2 (Sheet C-101)**

12. *A crosswalk across the Margarita's driveway should be provided.*

**Response:** A crosswalk has been added in this location, please see attached revised design drawings.

13. *A continuous sidewalk along the frontage of margarita's should be provided- there should be an expectation of some pedestrian use of that route to/from the 1<sup>st</sup> floor of the parking garage connecting to St. John St*

**Response:** The sidewalk in this location has been revised to provide a continuous sidewalk, while maintaining existing slopes adjacent to the existing entrance drive. Please refer to attached revised design drawings.

#### **Sidewalk Improvement Plan (Sheet C-107)**

14. *The network of pathways and lighting from Valley Street to the Western Prom should also be assessed for its adequacy to provide safe and direct connections to/from MMC and the parking garage to encourage walking*

**Response:** An assessment of the Valley Street Trail has been conducted, additional comments from the City of Portland July 20, 2018 requested additional evaluation. A final Valley Street Assessment will be provided once complete.

15. *A crosswalk across the driveway at 222/Margarita's is to be added.*

**Response:** A crosswalk has been added in this location, please see attached revised Design Drawings.

#### **Civil Details (incl. Sheet C-202)**

16. *The brick sidewalk detail is to be modified to state "2% cross slope (MAX." not (TYP).*

**Response:** The brick sidewalk detail has been revised, please see attached revised design drawings.

17. *Details are needed for detectable warning panels (cast iron) and Driveway (showing "2% cross slope (MAX.)").*

**Response:** The brick sidewalk detail has been revised, please see attached revised design drawings.

**Comment letter from Caitlin Cameron, Urban Designer Dated July 02, 2018**

1. *The one aspect of the current proposal that HP staff suggests be given further consideration is the color/tonal palette. The current proposal features a high level of contrast, which is visually striking, but also demanding. In staff's view, were the colors warmer in tone and "knocked down" in terms of contrast, the building would likely achieve a greater level of compatibility with its surrounding context.*

**Response:** The renderings emphasize the contrast between the actual material choices. Material samples will be provided.

2. *Staff recommend in order for the garage to be visually cohesive with the MMC campus and the surrounding context, the material color palette should be coordinated to include warm tones of the grey and white.*

**Response:** Material samples will be provided.

3. *Consider whether the high level of contrast is appropriate – though staff are supportive of the grey and white materials, the level of contrast may bring too much attention to the garage that otherwise is intending to be recessive.*

**Response:** Please refer to response above.

4. *Staff suggest more emphasis can be brought to both entrances – increase scale of entrances, canopies, lobby area, etc. to increase scale of these entrances in relationship with the scale of the building and the distance from the street.*

**Response:** MMC has added windows to the mechanical room on the first floor of the garage facing St John St, expanded the canopy facing St John St, and added bicycle storage in the lobby area. See revised plans.

5. *What is the material of the ramp roof? Is that depicted in the renderings?*

**Response:** The ramp roof will be precast concrete.

6. *There are some outstanding questions regarding the roof level design in relation to long views:*

- a. *Are the ramp and circulation tower roofs adequately depicted in the renderings? It is difficult to tell how visible these will be with the materials provided.*

**Response:** Yes. They are very small and not visible from a distance.

- b. *Concern about the visibility of the roof lighting poles and light levels, especially the impact on the Western Promenade.*

**Response:** The roof deck lighting poles have intentionally been limited to locations along the center of the roof deck to minimize their visual impacts as might otherwise be experienced if the lighting poles were located along the perimeter of the roof deck.

7. *The project proposes limited activity at the ground floors – the building use is garage only and is set back from the street. There is a garage entrance oriented to St. John and shuttle activity and an entrance facing the side surface parking.*

- a. *Consider ways of introducing more “eyes on the street” facing St. John Street whether that be more glass on the circulation tower, increasing the size of the entrance lobby, adding windows to the security/utility area of the façade (clerestory, 2<sup>nd</sup> level waiting lobby, etc.).*

**Response:** Windows have been added to the mechanical space facing St John St and the canopy has been enlarged. The proposed garage building will have full-time 24-hour 7-days-a-week security presence with security camera coverage of both the interior and exterior of the building. Bicycle racks have been added below the enlarged canopy to further activate the space.

8. *Staff request more information regarding the screening of cars. Screening methods include solid concrete spandrel wall with metal mesh railing on the ground floor. It is not clear whether the spandrel panels will conceal the headlights of cars. Will cars be screened from view on the top floor, from the Western Prom?*

**Response:** Yes, headlights will be screened by spandrel panels. Cars on the top floor of the garage will not be screened from the Western Prom. The elevation of the Western Prom is higher than the top floor elevation of the garage.

9. *Staff suggest the lobby entrance facing St. John Street could increase in size, include more fenestration, and/or include additional lighting.*

**Response:** Comment acknowledged. Windows have been added to the mechanical space on level 1 of the garage. See revised plans.

10. *Regarding "Eyes on the street" See Comment 8.*

**Response:** The proposed garage building will have full-time 24-hour 7-days-a-week security presence with security camera coverage of both the interior and exterior of the building.

11. *Rather than extend a wood fence to the street between the Railroad Building and the residential building, staff recommend using landscape.*

**Response:** A 4-foot fence along with landscaped screening will be provided between the Railroad Building and the residential building, please refer to attached revised design drawings.

12. *Clarify whether there is building lighting above ground level.*

**Response:** Along the western façade there are building lights that illuminate the emergency egress walkway. These lights are installed at 10'-0" above the finished grade of the walkway. At the garage entrances/exits at the eastern façade and at the northern façade there are lights installed at 20'-0" above the finished grade of the drive surfaces. Along the southern façade there are building security lights installed at 10'-0" above the finished grade. There also are lights installed under the ceiling of the entrance canopy at the eastern façade.

13. *Concern about light trespass on neighboring residential properties and level of light visible from the Western Promenade at night. More information is requested regarding the impact of site lighting from the long views, especially light trespass and visibility of the lighting on the upper stories and roof from the Western Promenade.*

**Response:** The roof lighting has been prepared to meet the lighting recommendations published by the Illuminating Engineering Society of North America (IESNA). The minimum recommended illuminance is 0.5 footcandles at the parking surface. The lighting design has been kept to a practical minimum to avoid excessive lighting levels. The designed minimum illuminance is 0.6 footcandles.

14. *Staff comment that the material color palette causes the building to stand out or be less recessive than desired. Therefore, the suggestion is that the grey and white materials should have a warm tone to be cohesive not only with the existing MMC campus but also the surrounding context.*

**Response:** The renderings emphasize the contrast between the actual material choices. Material samples will be provided. MMC is working to provide material samples for review.

15. *The rooftop design including light poles, ramp and circulation tower roofs, and any mechanicals should be accurately demonstrated in these renderings. It appears in the materials given that these rooftop appurtenances have minimal visual impact and are integrated into the design, but staff would like to clarify whether all these features have been included in the rendering images.*

**Response:** Yes, these features have minimal visual impact and were included on the renderings but may not be apparent from various vantage points due to scale of the objects relative to the building and/or eye elevation relative to the roof.

16. *Given the scale of the building and the set back from the street, the scale of the entrance lobby could increase to be more visible and provide a more "lively" space.*

**Response:** The proposed building entrance canopy has been extended along with the addition of bike racks, and windows in the mechanical room.

We look forward our next meeting with the Planning Board. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

WOODARD & CURRAN



David Senus, PE  
Project Manager

**Attachments**

1. Design Change Letter
2. Checker Block Paver Documentation
3. City of Portland Department of Public Works Correspondence
4. Subcatchment Area Evaluation
5. Construction Management Plan
6. Right, Title, & Interest
7. Waiver Request Form
8. Traffic Correspondence July 06, 2018
9. 222 St. John Street Parking Assessment
10. Lighting Design Updates Letter
11. Section 12 of the Level III Site plan Narrative