



August 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 2

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 comments in italics below, and our response follows each.

Comment letter from City of Portland Fire Department Dated August 3, 2018

1. *The only item that still is of concern is the location of the private hydrant. We'd like to have it moved further west, between the access road into the lower garage entrance and surface parking lot. The proposed location doesn't give us easy access for operations covering the majority of the building.*

Response: The enclosed plans depict a revised hydrant location as recommended by the Fire Department.

Comment letter from Wright-Pierce Dated August 06, 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. *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 following items have been reviewed:*
 - i. *The HydroCAD Subcatchments and Table 12-1 have been updated to report a total drainage area of 160,921 square feet (SF) conveyed to the stormwater treatment unit, and the applicant has confirmed this value as the correct area. this value differs slightly from a preliminary calculation provided in Section 12, Attachment 3. However, the 160,921 SF area is still smaller than the maximum volume supported by the treatment system, and no additional action on this item is necessary unless this value changes.*

Response: Comment acknowledged.

- 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, original submission). The applicant has noted this letter has been requested and will be forwarded upon receipt.*

Response: A letter has been requested from the manufacturer and will be forwarded 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 indicated a stormwater maintenance agreement will be provided following Site Plan approval, therefore, this item may require a condition of approval.*

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.*

- i. *The applicant has provided revised calculations for pipe flows to the 18_inch private stormdrain, which are now in agreement with the HydroCAD model's dynamic flow modeling. Review of this information indicates the project is in conformance with the City of Portland Code of Ordinances section 14-526 (b) 3.a subsection ii regarding downstream private drainage and the proposed rate of stormwater leaving the site is less than the existing condition in this location. It is understood that the model is limited to conditions where 1) the R-Tank system is empty prior to the storm, 2) down-gradient pipe or tailwater conditions are not impacting flow, and 3) dynamic tailwater conditions allow for the outlet to exceed the Manning's Equation standard flow rate. Off-site and down slope impacts or saturated conditions may prevent the system from conveying a 25-year 24-hour design storm event.*

Response: Comment acknowledged.

- ii. *As there is no existing connection from the property to the St. John Street stormdrain, any new connection results in a increase of flow. The applicant has provided correspondence from the City of Portland Public Works that the storm drain within St. John Street has capacity to accept the additional peak flow of 3 cubic feet per second (CFS) from a 25-year, 24-hour design storm event. Therefore, this connection in conformance with City of Portland Code of Ordinances section 14-523 (b) 3.a, subsection iii and IV, which refers to requirements for new connections and increase flow rates to City-owned infrastructure.*

Response: Comment acknowledged.

3. *Proposed Drainage Design*

- a. *The applicant has provided data indicated the inlet capacities of proposed catch basin grates can adequately convey flows from the 25-year, 24-hour design storm even for the most limiting subcatchment. No further action on this item is necessary.*

Response: Comment acknowledged.

- b. *The applicant has provided a statement confirming the HydroCAD Pond P-1 was developed in consonance with the information provided by the manufactures for the R-Tank units. Review of major items such as inverts, tank surface area, pond void*

ratios, and outlet elevations have confirmed that the HydroCAD model reflects the design. No further action on this item is necessary.

Response: Comment acknowledged.

c. *The applicant has confirmed the pipe exiting CB21 on sheet C-103 is an 18" pipe. No further action on this item is necessary.*

Response: Comment acknowledged.

d. *Pipe 22 has a 0.0% slope. The applicant has coordinated with the manufacture and confirmed this is typical of inlets to a JellyFish Filter. No further action on this item is necessary.*

Response: Comment acknowledged.

e. *CB12 has 1.37 feet of drop between the in and out inverts. The applicant has confirmed that this is intended due to large drop in grade.*

Response: Comment acknowledged.

f. *The HydroCAD output files reference 24-hour design rainfall amounts of 3.1", 4.6", and 5.8" for the 2-, 10-, and 25-year events, respectively. The applicant has indicated these data are from Appendix H of MaineDEP's Chapter 500 for rainfall amounts. No further action is necessary.*

Response: Comment acknowledged.

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. A wastewater capacity review form has been provided by the Department of Public Works indicated down-slope sewers have the capacity o serve the proposed project. Any outstanding capacity to serve letters may become a Condition of Approval for Site Plan Approval.*

Response: Please see attached Central Maine Power capacity to serve letter, additional, capacity to serve letters will be forwarded upon receipt.

5. *Parking Garage Drainage:*

a. *The applicant has provided confirmation that the top deck of the parking lot garage conveys rain event flows to the stormwater detention system. The applicant has provided additional detailing of an oil/water separator and has indicated that interior parking surfaces not exposed to rain events will convey flows to this oil/water separator.*

Response: Comment acknowledged.

6. *Site Grading:*

a. *The applicant has confirmed site grading will not be affected by future information regarding soil management, as that information ill only be used by the contractor for their own management.*

Response: Comment acknowledged.

b. *Grading review identified that Pipe 14 between CB15-CB16 has a negative slope. Please revise or provide explanation.*

Response: The pipe slope and associated invert elevations have been modified in the attached, revised plans.

c. *Top of curb and Bottom of Curb information at CB-18 appears to be inverted. Please revise or provide explanation.*

Response: These elevations has been modified in the attached, revised plans.

d. *Much of the proposed stormdrain has between 4 feet and 3 feet of cover. Detail on C-202 indicates rigid insulation shall be provided in these locations. No further action is necessary*

Response: Comment acknowledged.

7. *Snow Storage:*

a. *Catch Basin at intersection of D Street and St. John Street was previously located in a transition ramp next to flat curb. The applicant has provided additional notation to the plans to confirm the intent of the catch basin being located outside of the transition ramp, and with a granite inlet stone.*

Response: Comment acknowledged.

Comment letter from Planning Department Dated July 02, 2018

Zoning Analysis

1. *Proposed sign does not match others on campus per the sign plan submitted in 2008. In the final submittal, provide an explanation as to why the design diverges from the sign plan. Waiting on new draft sign plan to be uploaded to ePlan. Sign design is generally acceptable, just want to be sure that it is consistent with MMC's Plans for signs campus wide.*

Response: Please see attached signage plan.

2. *Will review TDM plan and provide final comments as soon as possible.*

Response: Comment acknowledged.

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 would still be helpful if it is possible to pull one together. What we are interested in is clear documentation of existing supply and demand & future supply and demand and rations behind each.*

Response: Comment acknowledged.

4. *CMP should include some discussion on methods to mitigate impacts to 210 St. John, particularly given location of construction access. Also speak directly to concerns about loss of landscaping there. Will there be revisions based upon the conversations with the owners of 210 St. John.*

Response: During the process of construction great attention will be required to ensure that homes and places of business are not overly impacted by construction activities or traffic. While the logistics of the CMP does not require work associated with or access through the adjacent properties, certain measures will be taken to minimize the

potential for a disturbance. Erosion control, physical barriers, temporary shoring and staged material deliveries will be coordinated during construction.

Care will be given to the owners and users of 210 & 212 St. John St. The residences are the closest in proximity and will likely experience the greatest impact. Individual site meetings will be held with the owners of these properties to discuss their needs throughout construction. Consigli and MMC are committed to working through logistical challenges with the neighbors and providing adequate and reasonable measures to accommodate their requests.

The design team met with the owner of 210 St. John Street on July 26, 2018. We have revised our drawing based on this conversation. The owner does not want arborvitae to be planted on his property as shown in previous plan. He would like to preserve and maintain the blue spruce on his property through construction. Should any plantings be damaged during construction, Maine Medical Center will work with the owner to replace plantings that are impacted during construction.

5. *Please note discussion regarding improvements to nearby Valley Street park space.*

Response: Comment acknowledged.

6. *Need construction easements on Union Station Plaza lot. These will be required prior to building permit. Construction easements will also be necessary on all sites where is proposed. This will be a condition of approval*

Response: Please refer to the excerpt language below taken from the leases between Maine Medical Center, Caste Cow, and Cowcatcher pertaining to improvements within the Caste Cow property. All other necessary easements or agreements with neighboring landowners will be obtained prior to requesting a building permit.

Caste Cow Lease

SECTION 5. TENANT'S CONSTRUCTION AND TERMINATION RIGHTS

(a) Construction of Building and Improvements. **Tenant acknowledges and agrees that it shall construct the Building and Improvements on the Premises** at no cost to Landlord and that landlord shall have no responsibility for securing entitlements on the Premises, the Common Driveways, or abutting property, or any site improvements on, above or below the surface of the Premises, the Common Driveways, any abutting property or any other property, including without limitation water, sewer, electrical and other utility lines, wires, pipes, conduits and the like or any related infrastructure (whether currently existing or installed in the future), and any improvements required by any Governmental Authorities in connection with Tenant's contemplated development or use of the Premises, or for the maintenance, repair, and replacement of any of the same.

SECTION 7. USE OF PREMISES

(a) Permitted Use. **Tenant shall construct or cause to be constructed upon the Premises, a building for use and operation as a parking garage, with accessory uses** needed to serve Tenant employees or for any other use allowed by zoning and approved by Landlord, such approval not to be unreasonably withheld, and based solely on whether Tenant's proposed construction would materially diminish the value of the Fee Estate (the "Permitted Use"). Any other use or change in use from the Permitted Use shall be prohibited.

Cowcatcher Lease

SECTION 3. TERM AND TITLE TO BUILDING AND IMPROVEMENTS

(d) Title to Building and Improvements. Beginning on the Rent Commencement Date, title to all newly constructed Improvements located in, on or at the Premises (but excluding the Premises, the Building and all currently existing Improvements, title of which shall remain vested in Landlord at all times) shall be vested in and remain in Tenant until the expiration of the Term or earlier termination of this Lease, or in the event of an eminent domain action involving all or any portion of the newly constructed Improvements (but only to the extent of the portion taken), at which time title shall automatically vest in Landlord free and clear of all interests of Tenant and without any payment therefor and Landlord's title thereto shall be unlimited except that, in the event of an eminent domain action involving only a portion of the newly constructed Improvements, title to the remaining newly constructed Improvements shall continue to be vested in and remain in Tenant until the expiration of the Term or earlier termination of this Lease. ...

SECTION 5. TENANT'S TERMINATION RIGHTS

(a) Construction of New Improvements. Tenant acknowledges and agrees that it shall construct any new Improvements on the Premises at no cost to Landlord and that Landlord shall have no responsibility for securing entitlements on the Premises, the Common Driveways, or abutting property, or any site improvements on, above or below the surface of the Premises, the Common Driveways, any abutting property or any other property, including without limitation water, sewer, electrical and other utility lines, wires, pipes, conduits and the like or any related infrastructure (whether currently existing or installed in the future), and any improvements required by any Governmental Authorities in connection with Tenant's contemplated development or use of the Premises, or for the maintenance, repair, and replacement of any of the same.

7. *Finalize plan for temporary parking for displaced employees. Waiting on feedback from City's traffic engineer.*

Response: Comment acknowledged.

8. *Provide more information on how snow ban parking will be managed. Based on your response to neighborhood comments, there is a better understanding of where you are in the process of determining where neighborhood residents will be permitted to park during snow bans.*

Response: Comment acknowledged.

Site Plan Review

1. *Waiting on confirmation that MaineDOT agrees to the installation of traffic signal (GP was making initial contact). Further comments on this from City's traffic engineer should be forthcoming.*

Response: Comment acknowledged.

2. *Intersection Design:*

- a. *St. John Street*

- i. *See most recent concept from Bruce Hyman and note follow up comment sent on 8/1:*

1. *Design should include radius curb (10'R) for the outside and inside edge of the right turn pocket.*

Response: The attached, revised plans reflect this edit.

2. *The exact sign placement needs some MUTCD guidance and placed in the sidewalk.*

Response: The attached, revised plans reflect this edit.

3. *As I mentioned previously at the meeting on Monday, all bike lines next to motor vehicle lands are to be 6" lines (both solid and dashed)*

Response: The attached, revised plans reflect this edit.

b. *D. Street*

- i. *Design should include 6' sidewalk and 4' esplanade (with street trees- 'Karpick' Red Maple or 'Browhall' Red Maple). Jeff Tarling has raised some questions about sidewalk plowing. He wrote: " knowing this route will likely be on the sidewalk plowing route in the future, the crosswalk, center island if there is one, and the Valley Street sidewalk should be constructed with the turning radii of our 'Trackless' sidewalk plow in mind" He is particularly concerned about the crosswalk landing on the east side of the Valley, where there is a stone retaining wall up against the back of sidewalk.*

Response: Waiting for further direction from the City regarding the need for easements on private property.

c. *Please forward Western Prom assessment when complete.*

Response: Please see enclosed assessment memos.

- d. *Please note Planning Board Concern regarding headlight glare and traffic relative to nearby residential properties opposite St. John Street.*

Response: At the Planning Board Workshop held on July 10, 2018, concern was expressed over the location of the primary garage driveway proposed across from D Street. Specifically concerns related to impacts to the two residential properties at the north and south corners of the D Street and St. John Street intersection resulting from additional vehicle maneuvers at this location, including noise, fumes, and headlights. For a variety of reasons, as discuss herein, we feel that concerns noted area addressed when considering the timing of vehicle trips to and from the site, and the existing site conditions.

Driveway Location Considerations

During the schematic design phase, the Maine Medical Center project team explored many options for the location of the primary garage driveway. The team looked at multiple locations along the Fraternal Order of Eagles frontage, along a 40' wide land area immediately south of the 222 St. John Street building, through the Union Station Plaza (Margaritas) driveway, and through the Ferguson Showroom and Plumbing Supply parking lot south of the site. In all cases, with the exception of the current proposal, the driveway did not create a 4-way intersection with a City block, and in most cases the driveway is in proximity to, yet off alignment with a nearby intersecting roadway on the opposite side of St. John Street (C Street or D Street). Also, in all cases the driveway is

located across from residential lot (s), including at the “Margaritas” entrance driveway to Union Station Plaza.

From the early planning stages for the garage, the initial traffic data indicated the potential for a signalized intersection at the primary garage entrance and modifications to the lane striping on St. John Street to allow for left and right turn maneuvers at the intersection. When exploring the various potential driveway locations, it was evident that a signalized intersection located off-alignment with a nearby intersecting City street would create significant impacts to the right of way and traffic movement through these zones. For instance, if a traffic light was situated at the “Margaritas” entrance driveway to Union Station Plaza, the signal and lane assignments would need to accommodate the C Street intersection, which is located 100’ to the south, stretching the intersection and creating a large zone of 3 or more lanes in St. John Street. In mid-block areas, such as an entrance along the south wall of the historic building at 222 St. John Street, the intersection would be located immediately across from and in line with a residential property. In all potential driveway locations that were explored, an equal or greater number of on-street parking spaces would be lost relative to the current proposal.

The proposed location of the primary entrance to the garage is the best option for the adjacent roadway. It creates a four-way intersection with D Street, minimizes the impact to on-street parking, and minimizes the impact to the adjacent residential lots.

Traffic Impacts

The proposed garage will result in an increased volume of traffic on St. John Street and at the primary garage driveway location, as discussed in the Traffic Evaluation Memorandum prepared by Gorrill-Palmer. When considering the concern over headlight impacts on these residential properties from turning vehicles, it is important to note that the peak exiting volume from the garage occurs between 4:15PM and 5:15PM. During most of the year this peak exiting volume occurs during daylight hours. During the winter months headlights would be in use in these periods; however, the volume of traffic drops off sharply after the PM peak hour, with very little traffic exiting the garage past 7 PM. Although the additional volume of traffic will result in an increase in noise and exhaust in the area, this condition is relatively short in duration (not continuous) and is comparable to many intersections in urban, residential areas of the City. It should be noted that the completed project will not generate additional truck traffic in the area, which is typically a primary contributor to noise and exhaust concerns.

Existing Site Conditions at the Proposed Driveway Location

The proposed driveway is situated at the location of an existing driveway that serves a 50+ space surface parking lot for the Eagles. This driveway is utilized throughout the day, with more substantial usage on evenings and weekends. As such, there is a present-day condition of a low volume of vehicles entering and exiting in an existing driveway located opposite the D Street intersection.

The proposed driveway is located at approximately equal elevation to St. John Street without any significant slope or grade differential that would cause headlights to project up toward the windows of the adjacent properties or down toward the windows.

The residential property on the north side of the D Street intersection has some deciduous screening (bushes and trees) between the house and the street; the property to the south of the D Street intersection does not have vegetative screening between the house and the intersection. We do not believe that the additional traffic generated by this project warrants the need to increase screening at these locations.

- e. *Please note that there may be additional comments forthcoming on the Fore River connection analysis. At the least, the analysis should note that a surface crossing is not precluded by the garage design.*

Response: Comment acknowledged.

- f. *Also note there will be a condition of approval regarding the Eagles entrance.*

Response: Comment acknowledged.

- 3. *Please show METRO stop south of the garage entrance along the Eagles frontage.*

Response: The attached, revised plans reflect this edit.

- 4. *Need street trees on D Street, as possible. Waiting on comments from fire/arborist on pavers see above comments on D street.*

Response: Waiting for further direction from the City regarding the need for easements on private property.

- 5. *Need capacity to serve letters*

Response: Please see attached Central Maine Power capacity to serve letter, additional, capacity to serve letters will be forwarded upon receipt.

- 6. *Need waiver request for average illumination levels. Response is understood. A waiver will be recommended.*

Response: Comment acknowledged.

- 7. *Concern re visibility of rooftop lights from western prom. Can top deck be closed down at night and these lights be shutoff? Please upload night renderings to ePlan.*

Response: MMC will install a timer and motion sensor system to the roof lighting system, please see the attached night renderings.

- 8. *As noted above, may need lighting within Western Prom. Further info on this pending evaluation noted above. Assessment still outstanding.*

Response: Please see enclosed assessment memos.

- 9. *Verification that HVAC meets standards will be included as a condition, as requested.*

Response: Comment acknowledged.

- 10. *Can material samples be provided for Planning Board. Please provide final proposed materials to the Planning Division when they come in. We will want to look at these, including the lighter concrete, before they go to Planning Board.*

Response: Precast samples were delivered to City of Portland Planning Department on Thursday August 16.

- 11. *Right Title and Interest*

- a. *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.

b. *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? Technically, Cowcatcher and Caste Cow are separate entities, so the drainage easement should exist (as the access easement does)*

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. Easements for drainage and utilities will be drafted upon development of As-Built drawings to ensure the location of these features are properly memorialized.

c. *Clarify terms around obligation to provide 'parking for up to 400 vehicles, either in the parking structure... or on the surface of said parcel until such time as said parking structure... is constructed' in the Caste Cow/ Cowcatcher deed*

Response: The obligation to provide 400 spaces in the garage is a hold-over from an easement between Cowcatcher, LLC and Caste Cow, LLC. A copy of the easement language is attached.

12. *To move forward as per 8/2 email between Dave Senus & the City of Portland/MDOT. Please note that the final overlay should be completed this summer, and that, during the period between mill and overlay, all area sidewalks should be ADA accessible.*

Response: Comment acknowledged.

Comment letter from TYLIN International Traffic Dated August 14, 2018

1. *The plans include aisle widths, and some do not comply with City standards. The applicant should request a formal waiver with supporting documentation.*

Response: A waiver has been requested for aisle widths, please refer to the attached revised Waiver Request Form.

2. *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 the responsibility of the applicant. The applicant has acknowledged this comment. I would note that I continue to communicate with Steve Landry at MaineDOT regarding the timing of traffic signal activation, I support the activation of the traffic signal at garage opening given traffic data and engineering judgement regarding area conditions and minimizing local street parking. I would note that if MaineDOT requires traffic data collection prior to activation, the application shall collect data at the same time of garage opening, and periodically until sufficient data supporting traffic signal activation is obtained.*

Response: Maine Medical Center will work with the City to advocate on behalf of activating the signal when the garage is open. If Maine DOT requires traffic data collection prior to activation, we propose the following schedule for data collection:

- *One month after garage is 100% open.*
- *One year after garage is 100% open.*
- *One month after the Congress Street Building is fully occupied and operational.*

- One year after the Congress Street Building is fully occupied and operational.
 - Every other year after the Congress Street Building is fully occupied and operational.
3. *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: Comment addressed on revised plans. The pavement arrows have been modified based upon discussion with Staff on August 16, 2018 meeting with the City of Portland.

- b. *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. Specific details on how the three-lane approach will be managed shall be provided. Specifically, how will the two egress lanes (and when needed) be signed for use. One of the egress lanes will become the right-turn lane onto southbound St. John Street and the other will become the shared through/left lane. Dynamic signage is suggested. For entry movements, the applicant should note how the lane drop (two to one lane) will work under peak morning volume time periods.*

Response: The access to the parking garage will operate as a single ingress lane and separate left/through & right egress lanes under typical day to day conditions. The access gates will be designed to accommodate other lane configurations should they be needed in emergency situations only. Security is on-site 24 / 7 to direct traffic as needed under emergency situations that require something other than typical lane usage. On-site security will use dynamic signage to direct traffic. A dynamic signage system has not yet been selected.

4. *The applicant has provided a traffic evaluation and my initial comments are noted below:*
- a. *I have requested the Synchro traffic model for review, the requested files have been provided. I find the models to be reasonable but would note additional calibration may be requested during the TMP process during Phase 3 permitting.*

Response: Comment acknowledged.

- b. *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. During the TMP process, refinement of the model may be required. As noted in the applicant's response to comments, the pedestrian phasing at the Congress Street/St. John Street intersection is inefficient and a contributing factor to long vehicular delays and queues. In conjunction with this application, the traffic signal equipment shall be upgraded to allow for concurrent pedestrian phasing. Implementation shall take place with the disposition of the Congress/ Valley signal, prior to the opening of the garage.*

Response: It is our understanding this comment is directed at the signalized intersection of Congress St. / St. John St. As identified in previous submittals to the City, the intersection operates at low levels of service with the current exclusive pedestrian

phasing as exists and observed today. Gorrill Palmer previously recommended changing the pedestrian phasing to concurrent to improve the level of service and presented those findings in the submitted traffic analysis. The two Congress Street intersections with St. John Street and with Valley Street operate as a single system. In order for the Congress Street / St. John Street intersection to be changed to concurrent phasing, the traffic signal at Congress St. / Valley Street would have to be removed or put on its own system. Signal warrant analysis by others indicated that the signal at Valley Street is not warranted and should be removed. It is our understanding from the City that they support this removal. Upon removing the signal, the Congress St. / St. John Street signal can be upgraded. This intersection will be further reviewed as part of Phase 3 of the MMC Congress Street hospital expansion Traffic Movement Permit application.

5. *The applicant has noted that the existing MMC vehicles parked at 222 St. John Street will be accommodated at the Gateway garage. The applicant shall provide documentation noting an adequate parking supply. The applicant conducted a study of existing parking demand at 222 St. John Street and determined through field observations that parking during construction can be accommodated in the Union Station Plaza Limited Partnership parking lot and the St. John Street east side parking lots. Based on the one day sample, it appears that demand can be accommodated. The applicant should note occupancy of 222 St. John Street during the survey day to confirm future parking demand can be accommodated*

Response: The referenced parking study was completed on a typical Tuesday in July (July 18th) at five different time periods throughout the day. Tuesdays are considered average days for traffic volume at 222 St. John Street. The results of the parking assessment indicate as noted, that the parking demand of 222 St. John Street uses can be accommodated on site during construction using existing surrounding parking areas.

6. *The applicant should provide a parking analysis for the parking demand and supply conditions for 222 St. John Street. This comment is intended to confirm the final parking condition for 222 St. John Street complies with City standards for parking supply, not during construction.*

Response: The future parking supply for 222 St John St is 337 parking spaces. There will be 245 parking spaces within the grade level of the garage. Additionally, there will be 52 surface parking spaces located to the North of the garage and the 40 surface parking spaces across St John St.

Future parking demand is not anticipated to change from today's documented demand. The uses within 222 St John St are anticipated to remain business offices with the exception of 12,000 square feet that will be allocated to MMC's use as a fitness center for employees. We anticipate that employees using the fitness center will park in the garage.

Construction Management Plan:

- a. *Construction trucks time limits shall be extended to include both MMC and general traffic peak hours.*

Response: Precast trailers will only transport loads between the staging yard and the job site outside of peak traffic hours as defined as 7:00am – 9:00am and 4:00 pm – 6:00pm.

- b. *The secondary storage yard shall be specifically identified.*

Response: A secondary storage yard is anticipated at Portland Yacht Services to store precast material not accommodated on site.

c. *The applicant should note how will the Eagles parking demand be accommodated during construction.*

Response: The existing Southern Eagles parking lot will remain in use throughout construction, with only a minor coordinated shut down to resurface and stripe the existing lot. Additionally, there is an agreement in place with the Eagles to provide a minimum of 37 parking spaces onsite during construction.

d. *All temporary crosswalks shall be ADA compliant.*

Response: Comment acknowledged.

e. *Construction Plans shall be provided for the roadway/signal work in St. John Street, D Street, and Valley Street.*

Response: The site subcontractor will develop a traffic phasing plan upon award. A detailed traffic control plan will be submitted prior to the work starting. Certain parameters will be maintained including at least (1) lane of through traffic, flaggers and visible barriers for vehicles. Inbound lanes will be maintained during morning commute times and outbound lanes will be maintained during afternoon commute times. Nighttime work hours may be considered to accommodate traffic.

7. *The applicant shall narrow the Eagles driveway width to match the aisle width.*

Response: Comment addressed on revised plans.

8. *The Eagles existing parking lot shall provide an aisle width dimension.*

Response: Comment addressed on revised plans.

9. *The applicant shall provide the grade of parking ramps within the garage.*

Response: Grade of speed ramp 13.5% maximum, with 7.0% transition ramps each end. Based on the standards we have used; the maximum recommended slope is 16%.

10. *To efficiently manage parking circulation, dynamic ITS signage noting parking available per level shall be provided.*

Response: Comment acknowledged.

11. *End island for parking spaces to remain in the Union Station Plaza Limited Partnership parking lot should be considered.*

Response: End islands for the parking for parking spaces to remain in Union Station Plaza Limited Partnership parking were considered within the design. However, Maine Medical Center does not have control of the property and has not proposed adding end islands within the parking lot. Additionally, the construction of end islands would result in the loss of parking spaces within the Unions Station Plaza Limited Partnership parking lot.

12. *The applicant should note when (and how will they be managed) movements to Level 1 from St. John Street be permitted.*

Response: Comment addressed on revised plans, a stop sign has been added.

13. *A STOP sign shall be installed at the egress from the 52-space parking lot.*

Response: Comment addressed on revised plans.

14. *The northern aisle width for the 52-space parking lot shall be dimensioned.*

Response: Comment addressed on revised plans. Additionally, it was determined that the aisle widths in this location exceeds the City standards of a 24' aisle width. A formal waiver has been requested within the attached Waiver Request Form.

15. *The applicant shall note who will park in the Union Station Limited Partnership parking lot and why not physically separate from the 52-space lot.*

Response: The existing parking within the Union Station Limited Partnership parking lot will remain unchanged as part of the garage construction and will not be utilized by occupants of 222 St. John Street.

16. *The applicant should provide information on how internal garage traffic circulation will generally work if a connection to Fore River Parkway is implemented in the future.*

Response: The internal circulation of the parking garage, inclusive of ramps between levels, is oriented toward traffic flow onto / off-from St. John Street. A future higher level (above the RR Tracks) connection to Fore River Parkway would introduce a conflict point within the circulation of the garage that would most likely decrease the overall efficiency of the garage and decrease the safety for the employees. If the access were to result in an at grade crossing any disruption to traffic flow, such as a train crossing, would generate significant queuing back into the garage and decrease efficiency, increase queuing, and decrease the safety for the employees.

17. *The applicant should note plans for expansion for electric vehicle charging to accommodate future demand.*

Response: Comment addressed on revised plans.

18. *Sufficient traffic analysis have been conducted to document acceptable operations at the St. John Street signalized entrance. The applicant should provide documentation/examples of 2,400+ space parking garages that have adequate internal traffic circulation capacity to empty efficiently during PM peak periods with one primary entrance and exit.*

Response: MMC has requested additional review from a third-party traffic reviewer which will be forwarded upon receipt.

19. *The applicant should note who will be permitted to park on the ground level and level 1.*

Response: Ground level parking will serve 222 St John St. Level 1 -8 parking will be allocated to Bramhall campus employees. In addition, 52 spaces on level 1 will be allocated to the Eagles.

Comments from City of Portland Regarding TDM Plan, Dated August 17, 2018

1. *Page 8: The plan talks about a shortage of 142 parking spaces, but the delta between total demand and supply, based on the numbers on page 7, is more. Please clarify.*

Response: This refers to the difference between *observed* demand (3,125) and *expected* demand (3,264). However, 142 is incorrect. It should say "139 parking spaces." Applicant revised TDM Plan to reflect this minor change.

2. *Page 8: "MMC's total parking deficit is estimated to be 800 parking spaces in 2017." Based on figures elsewhere, the existing deficit is more like 245. Can this discrepancy be explained?*

Response: This is an oversight. Applicant revised TDM Plan, removing reference to "800 parking spaces in 2017".

3. *Still waiting on bike parking inventory. As noted previously, the type of bicycle parking provided on the MMC campus, based upon images supplied in the TDM plan, is in some cases deficient per the Technical Manual to securely park bicycles and encourage bicycle commuting. (Some of the bicycle racks secure the front wheel only and do not provide the required two points of contact between the bicycle frame and bicycle rack.) In the revised TDM plan, include an inventory the type and number of bicycle parking spaces within the MMC campus at each location to ensure that, at a minimum, 1) the total number of racks that meet the parking standards equals the number required and 2) also meets the standard that bicycle racks are adequately distributed within the MMC Campus at main building entrances, also as required by the Technical Manual.*

Response: The applicant is conducting a bike parking inventory and has identified deficiencies with respect to the quantity and quality (type) of bike parking. The current distribution and accessibility of bike parking exceeds City standards. MMC will submit this documentation in August 2019 as part of the Congress Street site plan.

4. *We would continue to suggest identifying spaces on-campus for preferential carpool/vanpool parking (e.g. some spaces in the visitor garage or surface lots). Preferential spaces in the off-site employee garage are not likely to incentivize change in travel behavior in the way that preferential spaces on campus will.*

Response: The applicant would need to convert existing and/or proposed patient and visitor parking to preferred carpool/vanpool parking in order to achieve this outcome. This is not desirable at this time because it potentially limits healthcare access for patients and visitors.

5. *The parking cashout procedure continues to seem unnecessarily cumbersome (e.g. submitting a form, etc.). In the future, employees should have the opportunity to cashout in advance (i.e. receive cash up front in lieu of the parking pass).*

Response: As discussed in the latest TDM Plan (August 1, 2018), the applicant is evaluating ways to automate this process, including the use of commute management platforms that automatically link to payroll.

6. *Continue to suggest that subsidized METRO passes be distributed up front, rather than on a reimbursement basis (i.e. employees opt for either parking pass or METRO pass). Abuse is likely to be very low, and any additional paperwork/trip logging is likely to be a barrier.*

Response: Acknowledged. TDM Plan has been updated to say: "MMC will explore ways in which employees can "purchase" transit passes up front, rather than on a reimbursement basis. This "payment-in-advance" option may be contingent on MMC's capacity to verify transit ridership (e.g. through electronic boarding data) in order to minimize abuse of this benefit. It also possible that electronic fare collection and/or commute management platforms (discussed in Data Collection section), if implemented, could allow staff to easily log trips, potentially helping verify transit usage."

We would like to note some additional modifications to the revised drawing set that have occurred in addition to the modifications noted throughout the comment response:

- Garage foundation drains have been identified on Drawing Sheet C-102.
- Lobby Roof drain locations have been identified on Drawing Sheet C-102.

- An additional isolator row had been added within the R-Tank foot print, this will aid in the removal of accumulated sediments and long-term maintenance of the system. This has been identified on Drawing Sheets C-103 and detailed on Sheet C-204
- Sanitary sewer drains lines have been located exiting the building, and the oil water separator has been relocated. This has been identified on Drawing Sheet C-105
- The dumpster area located within the surface parking lot has been expanded. During review of the current waste management conditions it was noted that the dumpster area needed to be expanded. This has been identified on Drawing Sheet C-101 and detailed on Sheet C-203.

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

DAS/cms

Attachments

1. CMP Ability to Serve Letter
2. Signage Plan
3. Valley Street Trail Assessment
4. Night Renderings
5. Right, Title & Interest
6. Waiver Request Form
7. Construction Management Plan