

MEMORANDUM



TO: Rick Knowland, Planner
FROM: David Senus, P.E. & Ashley Auger, E.I.T.
DATE: April 21, 2014
RE: IMT Expansion, Level III Site Plan Application

Woodard & Curran has reviewed the Level III Site Plan Application for the proposed International Marine Terminal (IMT) expansion at 460 Commercial Street in Portland, Maine. The project consists of expanding the existing IMT facility and will result in approximately eight acres of new impervious area.

Documents Reviewed by W&C

- Level III Site Plan Application and attachments dated April 4, 2014, prepared by Carroll Associates and HNTB Corporation on behalf of MaineDOT.
- Engineering Plans, Sheets C1-C20, dated March 14, 2014, prepared by the MaineDOT.

Comments

- 1) In accordance with Section 5 of the City of Portland Technical Manual, a Level III Site Plan project is required to submit a stormwater management plan pursuant to the regulations of MaineDEP Chapter 500 Stormwater Management Rules, including conformance with the Basic, General, and Flooding Standards as written in Section 5 of the City of Portland Technical Manual. We offer the following comments:
 - a) Basic Standard: The Applicant has provided a plan, notes, and details to address erosion and sediment control requirements, inspection and maintenance requirements, and good housekeeping practices in general accordance with Appendix A, B, & C of MaineDEP Chapter 500; refer to sheets SW 7, SW 8 & SW 9. These plans should be made available to the contractor as part of the construction documents. The erosion and sediment control detail sheet (C11) should include details for stone check dams and a sediment barrier.
 - b) General Standard: The project will result in an increase in impervious area of approximately eight acres. As such, the project is required to include stormwater management features for stormwater quality control. The Applicant has proposed a porous crushed stone yard surface to infiltrate stormwater to meet the quality requirements associated with the General Standards; this approach is acceptable as presented.

The Applicant has considered the development of the rail corridor and concrete loading slab as a "linear" portion of the project and has noted that these features are part of an existing travel corridor in existence prior to July 19, 2007. The Applicant notes that the project is not required to meet the General Standards for linear areas, with reference to Section 3(B)(2) of the Memorandum of Agreement (MOA) for Stormwater Management that exists between the Maine DOT, Maine Turnpike Authority and Maine Department of Environmental Protection. However, the project must also meet the minimum standards set forth by the City of Portland, which includes conformance with the MaineDEP Chapter 500 standards without exception. Therefore, the Applicant is required to provide stormwater quality treatment for linear portions of the project to "no less than 75% of the volume from the impervious area" (Technical Standards Section 5, III., Chapter 500, Section 4, B, (3), c.). The Applicant should provide treatment for this area in accordance with the General Standard as written in the City's Technical Manual.

The Applicant has considered the Commercial Street shoulder widening as "linear" and has stated that they are not required to provide treatment to meet the General Standards for the same reason as noted above; however, they have proposed porous concrete in this shoulder area, which will provide treatment for this new impervious area. As explained above, the Applicant would be



required to provide treatment for this linear portion of the project, and the use of porous concrete is an acceptable measure for treating this area. Therefore, the Applicant has demonstrated compliance with the General Standard for the widened shoulder area of Commercial Street.

- c) Flooding Standard: The project will result in an increase in impervious area of approximately eight acres. As such, the project is required to include stormwater management features to control the rate of stormwater runoff from the site; however, much of the runoff from the Site is proposed to discharge to City-owned pipes that convey combined sewer overflows (CSO's) to the Fore River from CSO control structures in Commercial Street. This area of the Fore River is a tidal waterbody. As such, the Applicant has requested a waiver from the Flooding Standard. The Applicant should obtain approval from the City Department of Public Services for the proposed connections to City-owned overflow or drainage pipes. If these connections are acceptable to the City, we would support the requested waiver from the flooding standard.
- 2) The Stormwater Management Plan will need to include a stormwater inspection and maintenance plan for the proposed stormwater measures, such as the porous crushed stone yard surface and the porous concrete, developed in accordance with and in reference to MaineDEP Chapter 500 guidelines and Chapter 32 of the City of Portland Code of Ordinances.
- 3) Final plans must be stamped by a professional engineer (Section 14-527, sub-section (e) of the City of Portland Land Use Ordinance). At this time, the plans have not been stamped.
- 4) The Applicant has noted that approvals will be obtained from the MaineDEP for compliance with the Site Location of Development Act and Natural Resources Protection Act, and will be provided to the City upon receipt.
- 5) The Applicant has requested a waiver from the soil infiltration testing requirements of Technical Standard Section 5. Appendix D.4(a), which states that permeability must be shown to be reasonably consistent across the proposed infiltration area and may be determined by in-place well or permeameter testing, by analyses of soil gradation, or other means acceptable to the department. The Applicant anticipates that, based on known Site conditions derived from soil borings, a consistent permeability can be assumed across the Site. We support this waiver request so long as it is also supported by the MaineDEP during their review.
- 6) The Applicant has provided emails from the Maine Historic Preservation Commission (MHPC), who noted that they would like to dig a series of hand-dug test units along the proposed rail relocation line to help determine the status of the Glass Works Site underneath the proposed rail line. MHPC also concluded that an archaeologist should work with the excavation crew to monitor the work and record features of the canal if/as they are exposed. The Applicant should clarify the status of these items and whether an agreement between the MaineDOT and MHPC has been reached.
- 7) The MaineDEP expressed concerns regarding potential impacts to the Site's VRAP area; the Applicant should clarify whether these concerns have been resolved.
- 8) As part of the PWD Conditions of Water Service, the existing domestic service to the Util site must be brought up to current standards, and the new services installed to serve the New Yard, LLC's boat yard must be terminated. It does not appear that the Site Utility Plan currently reflects these conditions. The Applicant should clarify.
- 9) As part of the PWD Conditions of Sewer Service, the District noted that details for the preferred alternative to constructing a reinforced concrete slab over the sewer interceptor must be reviewed and approved by the District and that an easement modification will need to be approved by the PWD Board of Trustees. The Applicant should clarify the status of these approvals.
- 10) The proposed grading shown on Sheet SW2 and SW6 in Appendix D of the Stormwater Report and Sheet C8 - Site Grading and Drainage Plan do not appear to match. The Applicant should clarify.