

## **Memorandum**

**Planning and Urban Development Department**

**Planning Division**

**To:** Chair Morrissette and Members of the Portland Planning Board

**From:** Richard Knowland, Senior Planner

**Date:**  July 3, 2013

**Re:** Dinosaur Enterprise, LTD. Fuel Storage Contract Zone; Sunset Avenue; Great Diamond Island

**Project #:** #2012-576 **CBL:** 83A-K-5-10

**Meeting Date:**  July 9, 2013

1. **Introduction**

A public hearing has been scheduled to consider a proposal by Dinosaur Enterprises Ltd. for a fuel distribution service on Great Diamond Island. The applicant is requesting a conditional zone to allow this use in a residential zone. Attachments 1-A and 1-B include a map of the island and Planning Staff version of the proposed conditional zoning text. The application, background info, site photos and applicant’s conditional zoning text are shown on Attachments 2-A, 2-B, 2-C and 2- D, respectively.

Public notice of the workshop consisted of mailed notice to 40 property owners on Great Diamond Island, notice to the Interested Parties List and a legal ad appearing in the June 24, 2013 and July 1, 2013 editions of the Portland Press Herald.

1. **Findings**

**Existing Zoning: IR-2 residential zone**

**Proposed Zoning: Conditional zone to allow an existing fuel distribution business**

**Proposed Use: Fuel distribution service**

**Lot Area: 21,643 sq. ft.**

**Lot Address: 118 Sunset Avenue**

**Assessors C-B-L: 83A-K-5-10**

**Site:** The site is located within the southerly or village area of Great Diamond Island in a residential area with lot frontage on Sunset Avenue and Crescent Street. The site is a short walk from the public ferry landing and is south of the Diamond Cove property.

The site consists of a single family residence on the Sunset Avenue side of the property and equipment associated with the fuel distribution business including two fuel trucks parked in a driveway on the Crescent Street side of the property and a portable fuel tank adjacent to Sunset Avenue. We received word this week that the gasoline trailer will be discontinued in favor of a DOT-certified 110 gallon gas tank mounted on a pick-up truck.

The Crescent Street frontage of the property is about 100 feet from the 250 foot wide shoreland zone or about 350 feet from the shoreline edge. The property slopes down from Sunset Avenue to Crescent Street where the grade declines further to the shore.

1. **Background**

The proposed zone change is intended to allow the continuation of a fuel distribution service on Great Diamond Island in a residential zone that Ted Weber (Dinosaur Enterprises) has been operating on the site since 1988. Dinosaur provides gasoline and heating oil to Great Diamond Island residents and is the only source of fuel on the island. Fuel distribution uses are not listed as a permitted use in the IR-2 zone. The City has given notice to the property owner of this zoning violation and has required that this issue be resolved by moving the operations to an appropriately zoned site or seeking a zoning amendment to allow the use at the Sunset Avenue site, thus the reason for the rezoning application.

Dinosaur provides fuel services to island residents from the Sunset Avenue site. These services are provided primarily from two fuel trucks (2,400 and 3,000 gallon capacity) and a gasoline trailer (300 gallon capacity) parked at the site. Heating oil, kerosene and gasoline/diesel are the primary products sold by Dinosaur, provided through oil truck deliveries, or dispensing gasoline from the gas trailer on-site. We have been informed this week that a new code compliant tank has been mounted on a pick-up truck replacing the trailer.

Dinosaur does not maintain regular business hours and is more active during the summer months when more people are on the island. The logistics of providing fuel to an island are challenging and while Great Diamond has a limited number of cars and trucks, fuel service is needed to run these vehicles as well as to heat homes. The applicant indicates that similar fuel services have been provided on the island since World War II “without significant incident”.

The Dinosaur zone change application states: “*This letter will serve as the formal application…. to allow the continuation of the current fuel distribution services from the Sunset Avenue site, conditioned as outlined below. The discussion with this operation has actually continued for years, and most recently included discussions with the Diamond Island Association (“DIA”) regarding the “DPW Site” [Public Services site] on land licensed by DIA to the City of Portland. Those discussions, for a number of reasons, never reached the point of agreement and Dinosaur has since continued the attempt to reach a mutually agreeable resolution.*”

Later it states: “*Dinosaur was formally challenged by the City regarding this family operation on December 21, 2011 when the earlier proposal to move the Dinosaur business to the DPW site, licensed to the City by DIA, collapsed. Several reasons for the collapse were referenced but the primary reason is that the City and DIA could not find common ground on the detail. With respect to Dinosaur, those negotiations were initiated by an earlier challenge to our right to continue our long-standing business because of the City’s zoning regulations. We argued that Dinosaur was grandfathered, but ultimately agreed to join a discussion with the city to find a means that met the needs of all.*”

The Board should be aware the application does not disclose that after collapse of discussions with DIA and the City regarding moving Dinosaur to the Public Services site, the DIA Board subsequently passed a motion at their June 24, 2012 meeting stating that “*the Diamond Island Association will support the conditional zoning of the DPW site in order to locate and be limited to a fuel distribution business*”. See Attachment 1-D.While the applicant is free to pursue his application for the Sunset Avenue site, Planning Staff understood that this zoning approach is predicated on the DPS site not being an available option for this use because of previous opposition from the DIA. (See further discussion of this below, in section VIII, Land Use Policy.)

A Planning Board workshop on the Dinosaur application took place at the September 24, 2012 meeting.

**IV. Applicant Zoning Proposal**

The applicant requests a conditional/contract rezoning allowing the current Dinosaur business to continue at the Sunset Avenue site. The original application indicated that Dinosaur would like an agreement that would include the following conditions.

The terms of this agreement terminate if Dinosaur or the immediate Weber family discontinue the operation for at least 12 months.

The term of this Agreement terminate if Dinosaur or the immediate Weber family transfer the business or assets of the current business to unrelated third parties.

The term of this agreement terminate at any time the current business is transferred off the current Sunset/Crescent Avenue location.

The business of Dinosaur be limited to the current uses, both in type and scope, such that impacts on surrounding properties, if any, not be expanded.

The applicant’s original conditional zoning concept text is shown as Attachment 2-C-2. Staff has taken these concepts and drafted a conditional zoning agreement with appropriate boiler plate provisions described in section V. below. Note that the staff proposed agreement language has been updated reflecting a change from a fuel truck trailer to a fuel tank mounted on a pick-up truck.

1. **Planning Office Proposed Conditional Zoning Agreement**

The Planning Staff drafted conditional zone agreement is shown starting on Attachment 1-B. Key provisions of the agreement are highlighted below which are also found on Attachment 1-B-3. On Wednesday, the applicant submitted a revised zoning text which is described in the next section (VI) of this report. The primary difference between the two versions is elimination of the sunset provisions in section 3 below.

(2) Permitted uses

1. All of the permitted uses allowed in the IR-2 zone
2. Parking on the property of two (2) fuel trucks and one (1) truck fitted with a DOT- approved mobile gasoline tank and pump or such fixed tank as may be permitted by the State Fire Marshal in the Applicant’s fuel business;.
3. Dispensing and sale of fuel from the property.

(3) The conditions of this rezoning shall be:

1. This rezoning shall terminate if the Applicant or the immediate Weber family discontinue the fuel business operation for at least twelve months.
2. The rezoning shall terminate if the Applicant or the immediate Weber family transfer the business or assets of the current business to unrelated third properties.
3. The rezoning shall terminate at any time the Applicant’s business is moved off the property.
4. The business of the Applicant on the Property shall be limited to the current use of the Property (ie. the parking of two (2) fuel trucks and a truck fitted with a DOT-approved mobile gasoline tank and pump or such fixed tank as may be permitted by the State Fire Marshal for the Applicant’s fuel business, both in type and scope, such that impacts upon surrounding properties, if any, shall not be expanded.

(4) All equipment including, but not limited to the two (2) fuel trucks and a truck equipped with approved mobile gasoline tank and pump shall be located/stored on the Property not within the abutting street or other property. In addition, all dispensing of fuel shall be performed on the Property except for fuel truck deliveries to customer properties.

(5) The Applicant shall obtain and submit documentation to the City of all necessary City (including, if necessary, site plan approval), State (including, but not limited to, State Fire Marshal’s approval) and Federal approvals, licenses and/or permits necessary to address the operation of its fuel business on the Property including, but not limited to, fuel storage and dispensing operations on the Property. Such documentation shall also include all submitted applications to these agencies. In addition, an Oil Spill Prevention, Control and Countermeasure (SPCC) Plan, including all revisions and/or amendments, shall be submitted to the City for review and approval by the Planning Authority. A copy of all SPCC Plan inspection and testing records shall also be made available to the Planning Authority upon request.

**VI. Applicant’s Revised Conditional Zoning Amendment**

The applicant on Wednesday submitted a revised conditional zoning text reflecting several changes. (See Attachment 2-D.) The first change involved substituting references to a trailer mounted gasoline tank with a tank mounted on a pick-up truck.

The second change involved several changes made to the sunset provision for this use originally proposed and agreed to by the applicant. See Attachment 2-D-3, sections 3(a), 3(b), and 3(c). The key change is eliminating section 3(b) which states: “*The rezoning shall terminate if Applicant or the immediate Weber family transfer the business or assets of the current business to unrelated third parties*”. Applicant’s representative indicates this change was made based on Board comments at the September 24, 2012 workshop. A review of our notes of the meeting indicates there were perhaps two Board members favoring a permanent location for Dinosaur at the site but not necessarily a consensus by the entire Board. It should be pointed out that section 3(b) was in the original zoning request submitted by the applicant. Staff believes section 3(a), 3 (b) and 3(c) should be retained given the particular circumstances of this conditional zoning request such as the less than optimal location of the fuel service facility and other land use policy related considerations referenced in this report. (See section VIII, Land Use Policy). The conditional zoning amendment does allow continuation of an existing fuel service facility but provides time for consideration of a more optimal and long term solution somewhere else on the island if and when the Dinosaur conditional zoning lapses under the sunset provision. The Motion section provides the Planning Board with the choice between these two alternatives.

1. **Fuel Distribution Use**

The original application indicated the fuel distribution use consisted of two fuel delivery trucks and a small fuel tank on a trailer. The applicant states that the fuel truck trailer has been replaced with a code compliant tank mounted to a pick-up. Home fuel deliveries presumably take place off-site while gasoline is dispensed on the site as vehicles or equipment drive-up for refueling. While the scale of this operation is smaller than typical mainland operations, basic procedures and methodologies need to be documented given the type of material handled and stored on the site.

Karen Townsend of Woodard and Curran previously outlined potential local, state and federal regulations that apply to a fuel dispensing operation based on the original proposal. (See summary below and Attachment 1-B.) Information on such permits was not submitted as part of the original application. The applicant should provide documentation on the status of permits they have obtained, applicability of other permits and if additional permits are required, the time frame for obtaining such permits. Paragraph (5) above requires documentation of applicable permits.

Summary of comments from Woodard and Curran are shown below. Staff has subsequently updated this information.

**Federal** **Regulations**

Federal regulations require facilities prepare and implement an Oil Spill Prevention, Control and Countermeasure (SPCC) Plan. The oil trucks would be classified as mobile refuelers under the rule and the gas trailer would be classified as a bulk storage container, based on the assumption that it remains in this location when in use dispensing fuel. As a bulk storage container, the gas trailer must be equipped with sized secondary containment, whereas a mobile refueler is only required to meet the general secondary containment provisions of the rule, which may consist of passive or active containment methods. Passive containment would include dikes, berms, and diversionary structures, and active containment could include the use of absorbent booms, or drip pans.

Dinosaur did not have a SPCC plan at the time of the initial Planning Board workshop but they subsequently commissioned St. German Collins Environmental Consultants to develop such a plan. The submitted SPCC plan (dated October 2012) is shown as Attachment 2-F. The Maine DEP does not require submission of these documents for review and approval of the plan rather it must be completed by a competent professional, be updated from time to time and must be on file at the fuel distributor’s place of business. Note that paragraph 5 above requires Planning Staff review and approval of the SPCC.

Staff has reviewed the SPCC and has the following comments.

1. On page F-12 the plan references a garage. There is no garage on the property.
2. On page F-6 the plan references the facility is 600 feet from Casco Bay. Actually if one were to measure from Crescent Street frontage, the edge of the property is 350

feet from the shoreline edge.

1. As the trailer mounted tank is being replaced by a tank mounted on a pick-up truck the SPCC should be updated accordingly.

A review of the Peaks Island Fuel site plan file approved administratively in 2011

referenced a Spill Prevention, Control and Countermeasure Plan. The approved site plan

includes a 4 space concrete fuel truck parking area with curbing to form a containment

dike.

**State of Maine Regulations: State Fire Marshal** **and State Police**

The State Fire Marshal Office regulates above-ground tanks with a capacity of 60 or more gallons that store flammable or combustible liquids. Since the original gasoline tank was used to store and dispense motor fuels it was assumed it would be subject to NFPA 30A Motor Fuel Dispensing Facilities and Repair Garages, which requires secondary containment and appropriate appurtenant devices (eg. level gauge, audible high level alarm, and shut-off valve).

Staff has recently spoken to Stephen Dixon of the State Fire Marshal Office who is the staff person responsible for regulating aboveground tanks. There are two types of aboveground storage tanks “permanent” or “mobile”. The Dinosaur gas tank trailer falls outside the permanent category since it has wheels. For it to be classified as a permanent tank, the wheels must be removed, and the tank and related equipment would need to meet the permanent tank requirements. A permanent tank would also be subject to a minimum 25 foot setback from the nearest building and street right of way (Sunset Avenue) which, given their placement last year (as observed by City Staff), would not meet these standards.

The applicant has recently changed from 300 gallon fuel tank mounted on a trailer to a new 110 gallon tank mounted on a pick-up. Apparently the original fuel tank was not compliant for mobile application but the new one appears to be DOT certified according to the manufacturer’s web site (JNG Ellsworth).

With the change to a fuel tank mounted on a pick-up truck, the tank is clearly classified as mobile. NFPA 385 (Standard for Tank Vehicles for Flammable and Combustible Liquids) would presumably apply. According to Mr. Dixon no special permit is required from the State Fire Marshal for a mobile tank (however the tank would need to meet NFPA 385) although such vehicles are generally regulated by the Commercial Vehicle Enforcement Division of the Maine State Police. Staff did speak with Dan Russell of the Commercial Vehicle Enforcement Division who indicated that if the pick-up had a weight of less than 10,000 pounds (which is presumably the case with Dinosaur) it would not have any special permits beyond an annual regular state vehicle inspection. (Commercial vehicles may not take advantage of the island state inspection exemption for passenger cars). The two larger fuel trucks require an annual commercial truck state inspection which would include NFPA considerations. Coincidentally Mr. Russell indicated that an officer would be going to Great Diamond Island shortly to inspect the Dinosaur fuel trucks.

**City of Portland**

The City of Portland issues permits for flammable and combustible liquids in accordance with the Fire Prevention Ordinance. Dinosaur did submit an Application for the Storage, Use or Handling of Hazardous Materials, and Flammable and Combustible Materials to the City Clerk Office on September 19, 2012. Like other similar permits/licenses, it could not be processed until the property is zoning compliant. Capt. Chris Pirone of the Fire Department will be attending the public hearing.

**VIII. Land Use Policy**

The applicant is proposing a commercial use not permitted in a residential zone. Great Diamond zoning districts include two residential zones (IR-1 and IR-2), one business zone (I-B) and a planned unit development-mixed use zone (Diamond Cove IR-3). With an application to allow a commercial use outside an I-B zone on the island, it is appropriate to review existing zoning districts and land use policy.

IR-2

The site is located in the IR-2 residential zone which does not allow a fuel distribution use. The policy statement of the IR-2 zone is as follows.

“The purpose of the IR-2 island residential zone is to protect the character of existing developed residential neighborhoods on the islands and to allow infill where there are adequate public services available…”

I-B

Fuel distribution is a commercial use and would qualify as a permitted use in the I-B zone.

The policy statement of the I-B zone is as follows.

“The purpose section of the I-B island business zone is to provide limited areas on the islands for retail and service establishments that serve primarily the needs of the local island market area.”

There is an existing I-B Island Business zone on Great Diamond adjacent to the southerly public ferry, but it is limited to only 3 or 4 properties and there are no commercial uses located within the zone. Given the decidedly residential character of the district and proximity to the shore, it may not be a good location for a fuel dispensary use. While all of Portland’s Islands have business zones near public ferry landings, the reality is that most are either underutilized or have few businesses (except Peaks) because of limited business activity.

ITSOZ:

Sec 14-145.20 provides for an Island Transfer Station Overlay Zone (ITSOZ). With limited land on an island it can be a challenge to find appropriate places for commercial uses which feature large trucks not totally contained in a building, outside storage of equipment and supplies, etc. This has been an ongoing issue on Peaks Island where there has been discussion over time of creating a special zone for “contractor type” uses away from the main I-B zone and residential areas. On Peaks, the Public Services facility was relocated to the middle of the island away from the village area (with a specially created Island Transfer Station Overlay Zone, ITSOZ) to address this type of concern.

An effort to consolidate Dinosaur with the existing Public Services facility on Diamond Avenue offered promise in terms of clustering similar types of uses in one location on the island but that too requires a zone change. While the Public Services facility is a municipal use and permitted in the IR-1, Dinosaur is a commercial use. Public Services leases property from the Diamond Island Association and although at one point negotiations to allow Dinosaur seemed stalled, the Diamond Island Association Board as recently as June 24, 2012 voted to support relocation of Dinosaur to the Diamond Avenue Public Services facility.

The ITSOZ, enacted through a conditional zoning process, is intended to provide appropriate locations for solid waste and public works facilities. Peaks Island is the only island where a specific site has received this designation to date. Permitted uses in this zone include municipal solid waste facilities; recycling facilities; municipal garages, material storage and parking for vehicles; maintenance of municipal vehicles and equipment. Planning Staff has been working on an amendment to the ITSOZ that would allow public or private managed fuel storage facilities as a permitted use. As demonstrated in the Dinosaur situation, Peaks Island, Cliff Island, and other islands, there are basic services such as public works and fuel supply facilities that are critical for island life but are difficult to locate because of limited land area and the presence of large trucks and outside storage that can be problematic in a residential setting. This proposed future ITSOZ text amendment is not intended as a substitute for the Dinosaur amendment, rather it will provide a prospective solution to help locate future facilities that are unable to locate in island business zones. This is a text amendment only. Full enactment would require rezoning a specific site with a conditional zone. We anticipate submitting this amendment to the Board within the next couple of months.

**Consistency with Comprehensive Plan:** The Dinosaur zoning request must be evaluated for consistency with the Comprehensive Plan. The comprehensive goals and polices that were adopted as part of the Portland Island Study state the following:

**Portland Islands Goals:**

* The Portland Islands pose a completely unique situation for land use planning and zoning. Unlike most other densely inhabited islands on the Maine coast, which are separate municipalities, the Portland islands are similar to the neighborhoods of a large urban mainland municipality and pose strong contrasts of urban vs. rural and seasonal vs. year-round living. Similarly, unlike other areas of seasonal home concentrations in the rural Lakes regions of the State, the islands are subject to spillover growth pressures from the ‘city’, and invite comparison to the mainland’s relatively high level of public services in terms of streets, sewage, schools, waste collections, fire protection, police and libraries.
* The islands are different from the mainland in terms of the natural features, their resource value, the public services available (or possible), and the people who reside and work there. The City’s land use policies and regulations should reflect these essential differences.
* The overall land use goal is to balance future growth and development on the islands to preserve those essential natural, physical and social factors that contribute to the islands’ unique value and character.

**Portland Islands Policies**

* Portland's islands are unique and valuable natural areas and villages. Each island is unique, with individual community needs and aspirations. There are those most sparsely or seasonally populated, such as the Diamonds and Cushing, serving as summer retreat and vacation homes, to those that support a more significant year round population, such as Peaks ( within commuting distance of downtown Portland) and Cliff (an hour's boat ride away). Island residents are striving to sustain the mix of jobs, housing, education and culture of their unique and independent-spirited island community. [[1]](#footnote-1)
* Encourage development of a type, scale, diversity and density appropriate to the circumstances, environment, infrastructure, and service capabilities of each island.
* The City should adopt a policy for future development that minimizes the dependency on and intrusion of private automobiles on the islands.
* Protect groundwater aquifer resources from degradation or depletion as a result of the cumulative impact of development. Groundwater resources shall be managed so that the islands can be self-sufficient in reliance upon natural systems for water supply and sewage disposal. (Planning Board Report #70-89, see editor’s note, footnote 1)
* Islands are unique landforms, which have particularly fragile environmental characteristics. These environmental conditions pose upper limits to the level of development that can be supported in harmony with the islands’ environment. In addition, environmental conditions and logistical constraints pose challenges to provision of basic services such as solid waste disposal and other community services that are available or possible. Such concerns, including groundwater issues, are significant enough to dictate a policy of low-density development for the islands. (Planning Board Report #70-89, see editor’s note, footnote 1).

**Summary:** The southerly end of Great Diamond Island is almost entirely residential. The exception is the Public Services yard (permitted as a municipal use in the IR-1) located on Diamond Avenue. The existing I-B zone on the southerly end of the island has no commercial uses and the lots are very close to the shoreline. Non-residential uses on the Diamond Cove side of the island include a fire station, a restaurant and small store.

Fuel services are an essential community resource. Fuel is critical in operating a variety of equipment ranging from fire trucks, public service vehicles, and construction equipment, to lawn mowers. While groceries can be bought on the main land and transported on the ferry, obtaining fuel for heating and motor vehicles is more complicated. Fuel may not be transported on the ferry and must be delivered by private boat/barge. The transportation, storage and distribution of fuel requires specialized trucks and equipment. The City of Portland uses Dinosaur to fuel their trucks, equipment, ambulance and fire engine. At any one time there may be 8 to 12 City vehicles on the island supporting basic public services.

The applicant is proposing a contract/conditional zone on a property that has been used for fuel distribution in some form since 1988 in a residential zone that was not sanctioned under present or past zoning. The phrase “to protect the character of existing developed residential neighborhoods” in the purpose section of the IR-2 offers an important context in evaluating the zone change proposal along with the comprehensive plan policies for the Islands.

This week the applicant has proposed a change to the agreement, eliminating section 3(b) which states: “The rezoning shall terminate if Applicant or the immediate Weber family transfer the business or assets of the current business to unrelated third parties”. Applicant’s representative indicates this change was made based on Board comments at the September 24, 2012 workshop. A review of our notes of the meeting indicates there were perhaps two Board members favoring a permanent location for Dinosaur at the site but not necessarily a consensus by the entire Board. It should be pointed out that section 3(b) was in the original conditional zoning request submitted by the applicant. Staff believes section 3(b) should be retained given the particular circumstances of this conditional zoning request such as the less than optimal location of the fuel service facility and other policy related considerations referenced in this report.

**Recommendation:** The conditional zoning amendment is a positive step forward for provision of this essential service on Great Diamond Island with identification of the relevant safety codes pertinent to the use. It allows continuation of an existing fuel service facility upon which the islanders have long relied, and paves the way for a more sustainable solution elsewhere on the island. The Planning Department therefore supports the amendment, with the sunset provision, and in anticipation of incorporation of the fuel use in the ITSOZ for future applications.

1. **Motion For The Board To Consider**

Based on the information contained in Planning Report #31-13, the comprehensive plan of the City of Portland, the testimony and evidence heard at the Planning Board Public Hearing and other factors, the Planning Board finds that:

**[The Board should select Planning Staff Version (Attachment 1-B) or the Applicant’s Version (Attachment 2-D]**

The proposed Dinosaur conditional zoning amendment **[is/is not]** consistent with the comprehensive plan of the city of Portland and therefore **[recommends/does not recommend]** the proposed amendments to the City Council.

**Attachments**

Staff Attachments

1-A. Great Diamond Island Map

1-B. Proposed Conditional Zoning Amendment

1-C. Memo from Karen Townsend (Woodard and Curran) Revised 9-20-12

1-D. Letter from Diamond Island Association dated 9-19-12 of Meeting Minutes (6-24-12)

1-E. Peaks Island Fuel Site Plan

1-F Written Public Comment

Applicant Submissions

2-A. Original Contract Zone Application Submission dated 8-22-12

2-B. Site Photos and Area Maps

2-C. Proposed Conditional Zoning Text dated 9-21-12

2-D. Revised Conditional Zoning Amendment Text submitted 7-3-12

2-E. Background Information on Dinosaur Operations submitted 9-20-12

2-F. SPCC Plan (Oil Spill Prevention, Control and Countermeasure) by St. Germain-Collins

dated October 2012

2-G Email from Ron Ward dated 9-20-12

2-H Email from Ron Ward dated 6-28-13

2-I Neighborhood Meeting Info

2-J Photos of New Fuel Tank On Pick-up Truck

1. Editor's Note: While the basic plan for Portland's Islands was written in 1985, the goals and policies evolved in the intervening years with increased attention to the uniqueness of each island. These policies reflect these changes. The first two policies listed here are found in Planning Board Report #70-89, Planning Board Report Recommendation to Adopt the Portland Islands Groundwater Management Study as part of the Comprehensive Plan of the City of Portland and To Adopt Zoning Amendments to the Land Use Code.

   26 [↑](#footnote-ref-1)