



Alex Jaegerman, FAICP
Division Director, Planning Division

December 17th, 2014

Roger A Barham, Senior Gas Engineer
Unitil Corporation
325 West Road
Portsmouth, NH 03801

RE: **Granite State Gas Transmission Pipeline: Municipal Survey to update "Identified Sites" - structures within 700 ft of pipeline in Portland, Maine**

Dear Mr Barham:

I refer to your letter of December 2, 2014 requesting a review and update of your GSGT Location Plan for Portland Maine.

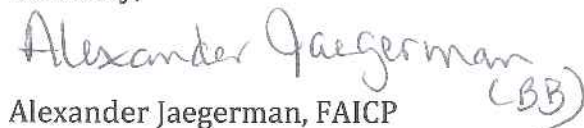
Your plan appears to include all of the existing buildings and uses of concern within the 700 foot buffer area, with 2 possible exceptions:

1. We are aware of a project that is likely to start construction on site in early Spring that may fall into the category of **"Identified Site – Structure"**. It is described below and identified (outline of site) on your plan.
 - **Location: 2282 Congress Street (opposite Blueberry Road)**
 - **Development: Convenience store (3850 sq ft including food service and tables and ATM) with fuel station (6 pumps)**

I have enclosed the approval letters and latest approved site plan for this project. If you would like additional information on the likely scale of occupation of the convenience store or details of this proposed use, please contact the developer David Latulippe at (207) 865 4323 or ddlatulip@aol.com.

2. The 700 foot buffer area also encompasses 2 locations that could be described as **"Open Areas"** because they are the trailhead parking areas (5-9 cars) for the well used Stroudwater Trail, one of over 30 identified and improved Portland Trails. I attach an extract from the Portland Trails website that illustrates the trail network in this vicinity and identifies these parking places. I have roughly identified these on the enclosed plan.

Sincerely,


Alexander Jaegerman, FAICP
Planning Division Director

CC: Barbara Barhydt, Development Review Services Manager



December 2, 2014

Director Alex Jaegerman
Planning Division
City of Portland
389 Congress St, 4th Floor
Portland, ME 04101

Dear Director Jaegerman,

Granite State Gas Transmission Pipeline: Municipal Survey to update "Identified Sites"

On an annual basis Granite State Gas Transmission (GSGT) reviews structures located within 700' of the pipeline for new construction, demolition and change of use. The purpose of this review is to update the High Consequent Areas (HCAs) which require additional maintenance and risk mitigation measures as part of our Pipeline Integrity Management Program.

An HCA is triggered when either (1) 20 or more occupied buildings, or (2) an Identified Site is located within close proximity of the pipeline. Generally, an Identified Site is any area where people congregate. The attached set of plan(s) detail our current record of Identified Sites adjacent our pipeline within the limits of your municipality.

Federal Regulations governing pipeline integrity management recognize the value that public officials, with responsibilities for safety or emergency response and planning, to help operators accurately identify Identified Sites.

GSGT is outreaching to public officials in these disciplines during this survey. I ask that you take a moment to review the maps for accuracy, and mark up and return all of the maps in the pre-paid envelope provided, by December 31, 2014. Attached is a "Guide to updating Identified Sites".

If you have any questions regard this request for your assistance please do not hesitate to contact me.

Sincerely

Roger A Barham
Senior Gas Engineer
Unitil Corporation
T 603.294.5191
barham@unitil.com

Guide to Updating Identified Sites

Purpose of this Update

On an annual basis Granite State Gas Transmission (GSGT) reviews structures located within 700' of the pipeline for new construction, demolition and change of use. The purpose of this review is to update the High Consequent Areas (HCAs) which require additional maintenance and risk mitigation measures as part of our Pipeline Integrity Management Program.

An HCA is triggered when either (1) 20 or more occupied buildings, or (2) an Identified Site is located within close proximity of the pipeline. Generally, an Identified Site (see full definition below) is any area where people congregate.

Unitil is reaching out to public officials in each municipality who have the following responsibilities to assist in accurately documenting Identified Sites:

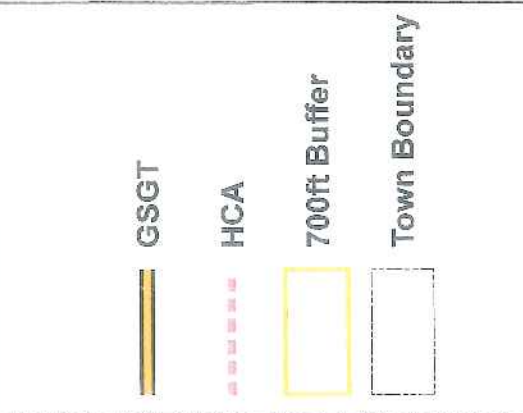
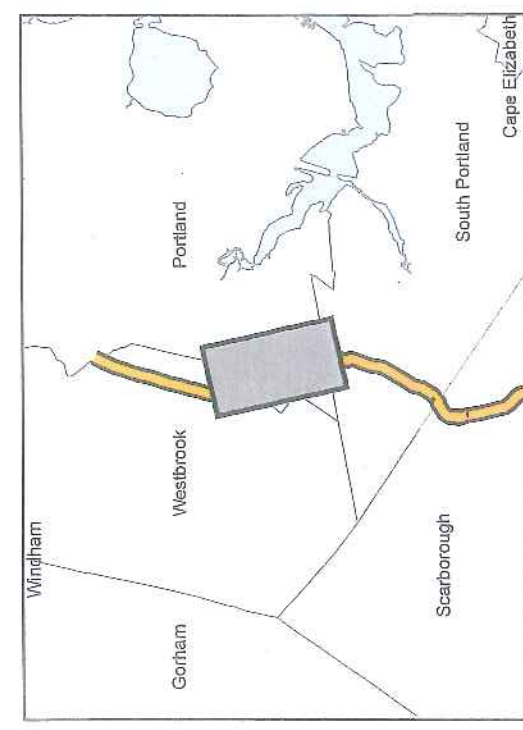
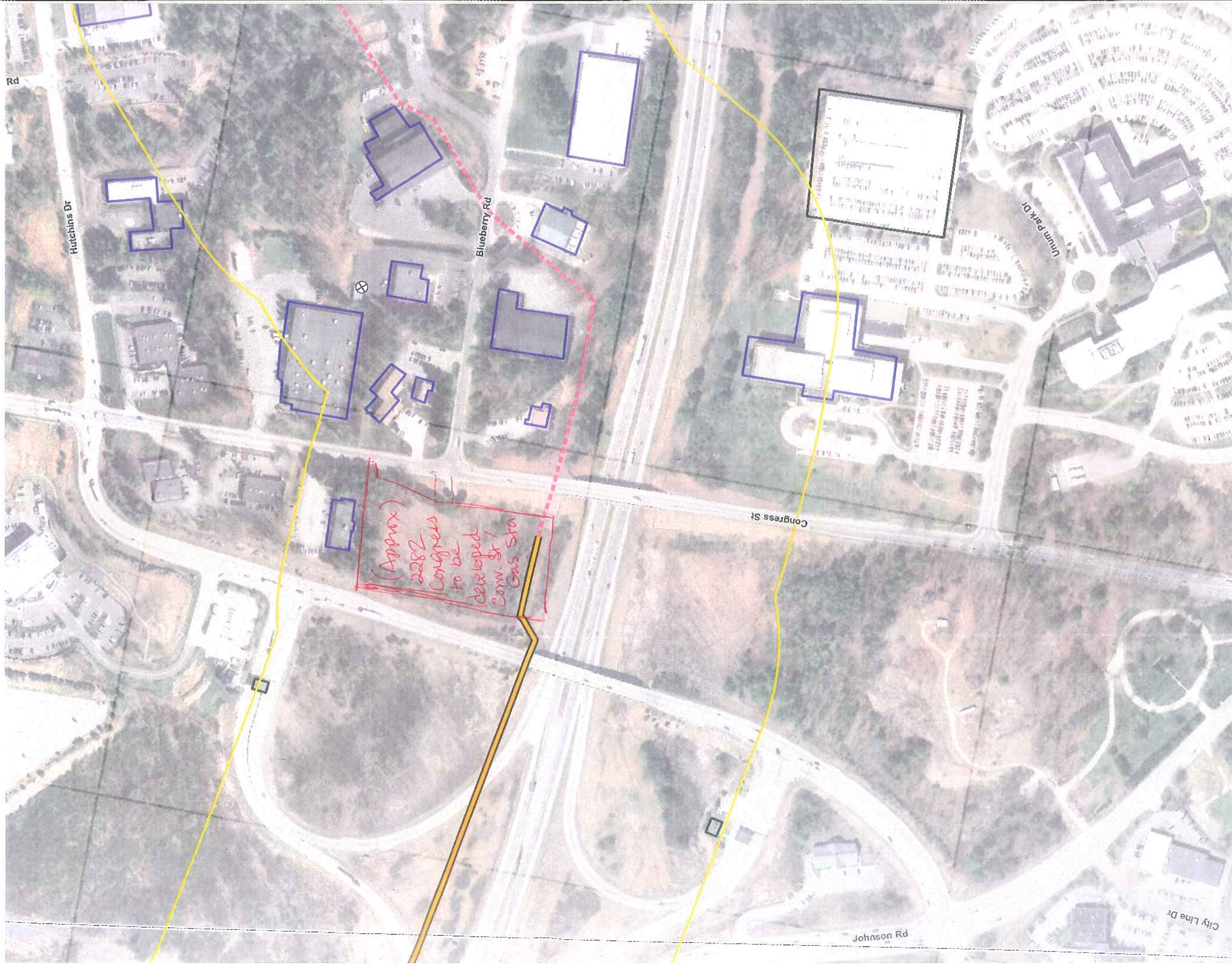
1. First Responders (Safety or Emergency), and
2. Land Use (Planning or Zoning).

Definition of an Identified Site

An Identified Site is defined as a structure that meets one of the following criteria:

1. An outside area or open structure that is occupied by twenty (20) or more persons on at least five (5) days a week for ten (10) weeks in any twelve (12)-month period. (The days and weeks need not be consecutive). Examples include but are not limited to:
 - Beaches and Camping Grounds
 - Playgrounds and Ball Fields
 - Recreational Facilities and Recreational Areas near a body of water
 - Stadiums and Outdoor Theaters
2. A building that is occupied by twenty (20) or more persons on at least five (5) days a week for ten (10) weeks in any twelve (12)-month period. (The days and weeks need not be consecutive). Examples include, but are not limited to:
 - Religious Facilities
 - Office Buildings
 - Community Centers
 - General Stores
 - 4-H Facilities
 - Roller Skating Rinks
 - Multi-Family Dwelling (9 units or more)*

* Unitil/GSGT defines ALL multi-family dwellings that are 9 units or more, as Identified Sites
3. A facility occupied by persons who are confined, are of impaired mobility, or would be difficult to evacuate. Examples include but are not limited to:
 - Hospitals, Prisons, and Schools
 - Day-Care, Retirement and Assisted-Living Facilities

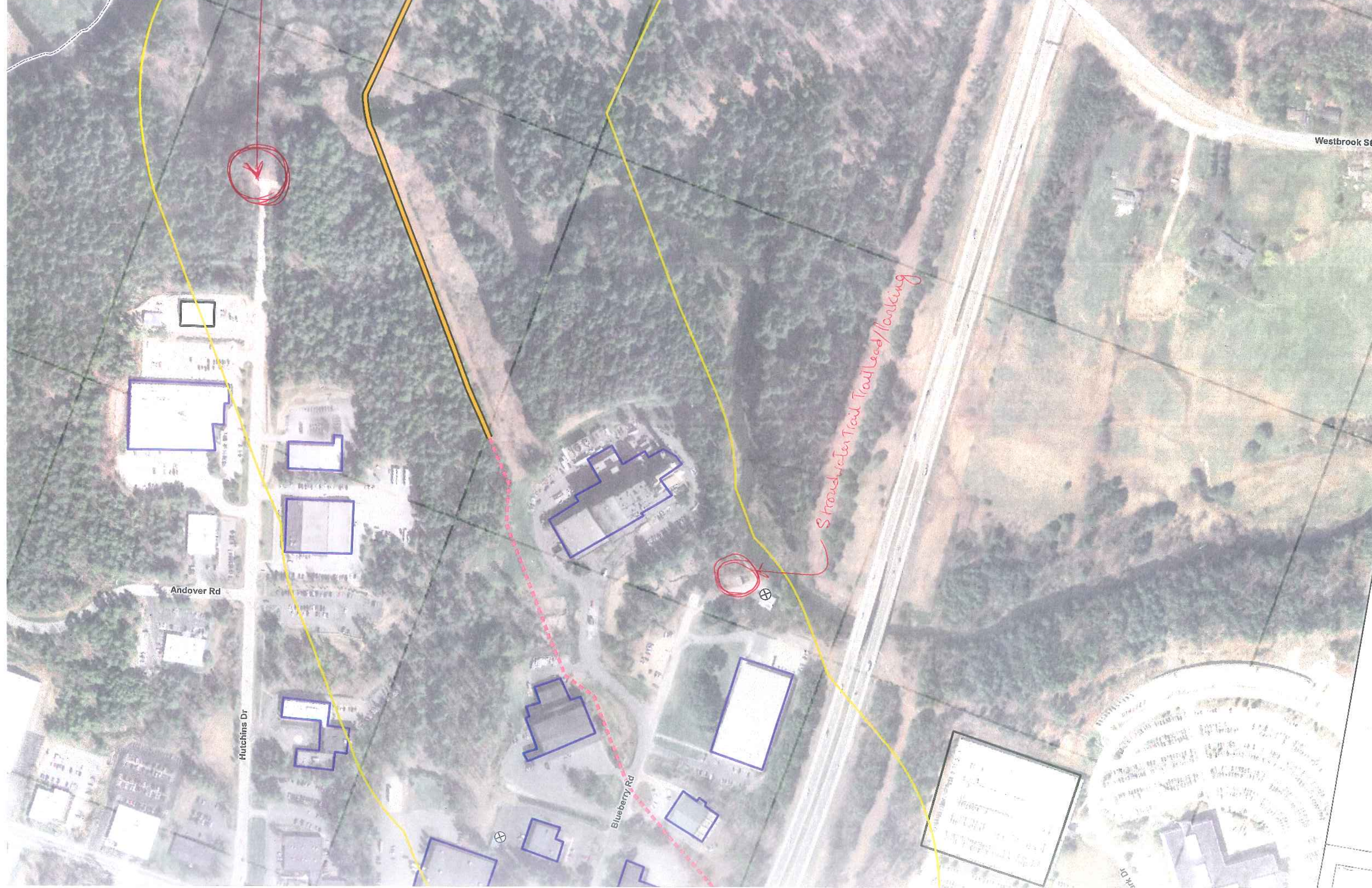


Site
Structure
Occupied by 20 or more persons on 5 days a week for 10 weeks in any 12 month period

Identified Mobility Site
Structure occupied by persons who are confined, mobility impaired, or would be difficult to evacuate

Area
Side area or open structure that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12 month period

Identified Site



Westbrook St

Andover Rd

Hutchins Dr

Blueberry Rd

Stroudwater Trail Trailhead/Marking

