# MEMORANDUM

**TO:** Nell Donaldson, Planner

**FROM:** David Senus, P.E. & Ashley Auger, E.I.T.

**DATE:** December 9, 2014

**RE:** Brighton Ave Hotel Redevelopment, Preliminary Level III Site Plan Application

Woodard & Curran has reviewed the Preliminary Level III Site Plan Application for the proposed hotel redevelopment project located at 1210 Brighton Avenue in Portland, Maine. The project involves the demolition of an existing 135 room motel and the construction of a new 86 room hotel, parking lot, and utilities.

**Documents Reviewed by Woodard & Curran**

* Preliminary Level III Site Plan Application and attachments, dated November 14, 2014, prepared by Walsh Engineering Associates, Inc., on behalf of Portland Hotels, Inc.
* Engineering Plans, Sheets S1.0, C1.0, C2.0, C3.0, L1.1, C4.0, C4.1, C4.2, C4.3, C4.4, D1.0, & D2.0, dated November 14, 2014, prepared by Walsh Engineering Associates, Inc., on behalf of Portland Hotels, Inc.

**Comments**

1. In accordance with Section 5 of the City of Portland Technical Manual, a Level III development 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, Flooding and Urban Impaired Stream (UIS) Standards. We offer the following comments:
	1. Basic Standards: A site plan and details have been provided 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; however, a written erosion and sediment control plan and/or detailed erosion and sediment control notes should be included with the Final Site Plan submittal for review.
	2. General Standards: The project will result in a net decrease in impervious area of approximately 15,152 square feet. As such, the project is not required to include any specific stormwater management features for stormwater quality control. As with all redevelopment projects, the City of Portland encourages the integration of stormwater quality treatment systems and low impact development design concepts into the design. Also, it should be noted that the City of Portland is considering adopting a stormwater user fee which is likely to be assessed based on square footage of impervious area on a commercial site. It is anticipated that annual credits may be offered to reduce the fee for properties that incorporate certain acceptable forms of stormwater quality treatment and/or quantity detention. Please consult the Portland Department of Public Services for more information regarding this potential future stormwater fee.
	3. Flooding Standard: The project will result in a net decrease in impervious area of approximately 15,152 square feet. Based on the reduction of impervious area, and the Pre- and Post-Development stormwater analysis provided in the Applicant’s submittal, the project is not required to include any specific stormwater management features to control the rate of stormwater runoff from the site.
	4. UIS Standard: The project is located within the Capisic Brook Watershed, an UIS. The project will result in a net decrease in impervious area, and no new developed area. Based on the reduction of impervious area, the project is not required to mitigate or compensate to meet the UIS standard.
2. The Applicant has designed the proposed stormwater discharge locations to approximately align with the existing stormwater discharge locations. This is confirmed in the Application text, where the Applicant notes that “The stormwater discharge points will be located in the same location as the existing stormwater discharge points”. The Applicant has performed an analysis for each discharge point to understand the changes in peak flow rate from the pre-development condition to the post-development condition. In all cases, the area contributing flow to a discharge location is roughly similar in size, pre- to post-development. In all cases, the Applicant’s design and stormwater model would indicate that the peak flow rate will be the same or slightly reduced in the Post-Development condition. Overall we agree with this approach; however, we request that the Applicant describe and document the existing ground conditions at each discharge location, both on the Applicant’s property and on the adjacent, abutting property. If any of these areas are not properly stabilized or if there are any observable areas of erosion, the Applicant will be required to stabilize the area as part of this project.
3. The Applicant has reached out to the applicable utility companies requesting ability to serve the proposed development, and awaits documentation from the City of Westbrook, CMP, and the Portland Water District. Letters from each utility should be forwarded to the City Planning Office upon receipt.
4. The project will disturb over one acre of land and will therefore require filing a notice of intent to comply with the Maine Construction General Permit with the MaineDEP; a copy of the notice should be forwarded to the City when filed with MaineDEP for the project records.
5. A detail should be provided for a Detectable Warning Panel for Sidewalk Ramps within the City Right-of-Way in accordance with Figure I-7 of the City of Portland Technical Manual.
6. The Sidewalk Reconstruction Detail provided for the work on Brighton Avenue should comply with Figure I-12 of the City of Portland Technical Manual.
7. The Applicant should provide a detail for trench work within the City Right-of-Way in accordance with Figure II-12 of the City of Portland Technical Manual.
8. The Applicant should provide details for the proposed retaining walls and riprap aprons.