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August 9, 2013

Ms. Shukria Wiar  
City of Portland Planning  
389 Congress Street  
Portland, ME 04104-3553

**Subject: Proposed Truck Loading Area – 56 Milliken Street  
Application ID: 2013-181  
Comments from City of Portland Staff**

Dear Shukria:

FST has received your memos and reviewed the comments (*italicized*) on the above referenced project. Your comments (*italicized*) and our responses (**bold**) are as follows:

**Comments from Shukria Wiar:**

**Comment 1:**

*Will there be any new lighting being proposed? If so, please provide lighting catalogue cuts and show location on site plans. We will also need photometric plans.*

**Sheet C-4.0 is the photometrics plan for the project. This plan only represents the lighting coverage attributable to the new fixtures. A Kim Lighting “wall director” fixture is proposed at the loading dock location. A catalog cut is provided with this letter. We note these are several existing wall mount fixtures along the existing building sidewall. These fixtures provide primarily security level lighting coverage for the relatively isolated site area.**

**Comment 2:**

*Is there any options to decrease the impervious area as related to this project?*

**Figure AT-1 included with the submission materials shows the AutoTURN movement for the WB-67. The figure shows support for the extent of pavement provided. Ideally, we would have liked to actually provide a greater area for truck maneuvering given the WB-67 design vehicle. However, the applicant has chosen to go with as minimal area as we felt comfortable with particularly given the moderate level of use anticipated for the new docks.**

**Comment 3**

*The applicant is not proposing sidewalk or curbing as part of this project. Please address how this project is meeting the sidewalk waiver criteria?*

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The project is seeking to meet the sidewalk waiver criteria (Section 14-506(b)) as follows:

Criteria 1 – There is no reasonable expectation for pedestrian usage coming from, going to and traversing the site. The site is an industrial site. The only internal site sidewalks are for ADA access to the building front entrance. No sidewalks exist on Milliken Street or Riverside Industrial Parkway.

Criteria 2 – There is no sidewalk in existing or expected within 1,000 feet and construction of sidewalks does not contribute to the development of a pedestrian or oriented infrastructure. No sidewalk exists or is expected within 1,000 feet of the site. No significant pedestrian activity has been observed on Milliken Street and Riverside Industrial Parkway. No sidewalk exists on Milliken Street or Riverside Industrial Parkway.

**Comments from Dave Margolis-Pineo:**

**Comment 4:**

*The survey plan needs to be stamped.*

**A stamped copy of the survey plan will be provided under separate cover.**

**Comment 5:**

*Proposed catch basins require three foot sumps.*

**The catch basin detail has been added to Sheet C-6.2 and it calls for a 3' sump.**

**Comments from Tom Errico/Traffic:**

**Comment 6:**

*The applicant should provide auto-turn template graphics that support the proposed pavement area. It is suggested that pavement area be reduced if it can work from a truck circulation perspective.*

**See Figure AT-1 included with the original submission materials. This figure shows that the WB-67 design vehicle must maneuver into a 180 degree change of direction before reversing into the loading bays. This is not the most desirable but does eliminate additional pavement that would have otherwise extend out 50 feet or more in front of the loading bays.**

**Comment 7:**

*The project is proposing a 22-foot wide circulation aisle which is narrower than the typical 24 foot requirement. Given the location of this drive, I find it to be acceptable.*

**No response necessary. We appreciate this consideration as this does aid a small amount in offsetting the new impervious surface area.**

**Comment 8:**

*I will coordinate the evaluation of sidewalk needs along property frontage with DPS staff and will provide a response in the future.*

**We will respond to any further comments related to this item upon receipt.**

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**Comments from Marge Schumckal/Zoning:**

**Comment 9:**

*The I-M zone has a minimum 10' pavement setback requirement. I measure approximately 53' to the RR tracks in the rear.*

**No response necessary. The maximum impervious ratio on Sheet C-2.0 has been revised from 100 percent to 75%.**

**Comments from Dave Senus:**

**Comment 10:**

*Per Chapter 7.1 of Volume III of the MaineDEP Stormwater BMP Manual:*

*2a) Pretreatment devices such as grassed swales, grass or meadow filter strips, and sediment traps shall be provided to minimize the discharge of sediment to the underdrained soil filter. Pretreatment structures shall be sized to hold an annual sediment loading calculated using a sand application rate of 50 cubic feet per acre per year for sanding of roadways, parking areas, and access drives within the subcatchment area. The current design does not reflect these features for the management of runoff from much of the paved area.*

**A 175' long, two foot wide by 6 inch deep 2.5" crushed stone diaphragm has been added along the edge of the proposed pavement for pretreatment based on 40 percent void space. This provides approximately 140 c.f. of volume which more than satisfies the requirements. The long term maintenance of this pretreatment measure will involve inspection and monitoring of the stone area for sediment build up and debris. Revised Sheet C-3.0 shows the stone diaphragm. A detail has been added to Sheet C-6.1.**

**Comment 11:**

*b) Although it appears that the Applicant has not performed a test pit to determine depth to groundwater at the location of the soil filter system, they have designed the system anticipating a high groundwater level. The proposed impermeable liner and liner underdrain system is an acceptable means of separation from high groundwater and high bedrock conditions; a test pit is therefore not required.*

**No response necessary. We appreciate the reviewer's consideration and willingness on this item.**

**Comment 12:**

*3) Figure WS2 - Post Development Watershed Map: The SC102 and SC101A boundaries do not appear to reflect the extent of the capture area associated with the proposed loading dock trench drain. If the capture area for the trench drain is greater than currently reflected on the figure, the Applicant shall recalculate the "impervious area treated" number for the project.*

**The WS-2 Map has been revised. No updates to computation were necessary. The revised figure represents the values in the model.**

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Comment 13:

4) *It is unclear from the project data sheet whether the project will disturb more than one acre of area. Disturbances greater than one acre require filing a Notice of Intent to Comply with the Maine Construction General Permit with the MaineDEP.*

**The project will create approximately 46,600 s.f. of disturbance. As such, we will be filing a Notice of Intent to comply with the Maine Construction General Permit with the MeDEP. A copy of the NOI Application form is enclosed. The full application has been submitted to MeDEP under separate cover.**

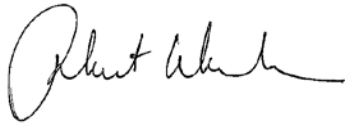
5) The Applicant should provide a proposed catch basin detail

**A catch basin detail has been added to Sheet C-6.2.**

If you have any questions with regards to this letter, please contact our office.

Sincerely,

FAY, SPOFFORD & THORNDIKE



Robert J. Woodman, P.E.  
Engineer

RJW/cmd

Enclosure

c: Mike Lyne and Neil Geary, JHR Development of Maine LLC  
Bill Hopkins – Archetype Architects