



October 13, 2020
20414

Maureen O'Meara, Town Planner
Town of Cape Elizabeth
320 Ocean House Road
P.O. Box 6260
Cape Elizabeth, Maine 04107

RE: 498 Spurwink Ave Resource Protection Permit Review

Dear Maureen:

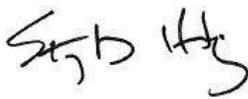
We have received and reviewed a submission package for the subject project from the Cape Elizabeth Land Trust (CELT). The package included an October 2, 2020 memorandum from the CELT Education and Stewardship Coordinator, Phillip Mathieu, addressed to the Planning Board and an October 2, 2020 CELT Attachment B - Site Plan. The applicant is proposing to install bridges and boardwalks for existing trail crossings at the Pollack Brook Preserve property at 498 Spurwink Avenue. Many of our initial review comments as presented in our September 8, 2020 review letter still apply. Based on our review of the submitted materials and the technical requirements of Section 19-8-3, Resource Protection Permit, we offer the following comments:

1. The applicant notes in the documentation that the wetland boundaries were field-delineated by FB Environmental during the preparation of their 2019 report. The FB Environmental report qualifies their field work in the Delineation of Hydrologic Features section on Page 3 of the report by stating *"A formal wetland and stream delineation was not conducted within the project area. As such, wetland boundaries depicted on the maps within this report are approximate"*. While this general level of wetland mapping may be sufficient for the purposes of this application given the scope of the proposed improvements, the Planning Board should review this issue with the applicant to ensure that the wetland mapping procedures used are adequate.
2. The applicant has presented the impacts of the bridges and boardwalks in linear feet of bridge or boardwalk and total area of each impact within a table on the Site Plan. The applicant should clarify on the plan that the area noted is in square footage of the impacts, provide a width of each item to be constructed, and provide a cumulative impact area of the overall project.
3. The applicant has provided a table in the memorandum to the Planning Board that states the length and area of each segment of boardwalk and bridge proposed to be constructed. While we did confirm the 1,428 square feet of total area of bridges and boardwalk cumulatively, we believe that the area of boardwalk to be built in an RP-2 wetland should total 488 square feet which would provide a total RP-2 impacted area of 888 square feet when added to the envisioned area of the bridges. The applicant should check the impacts and provide revised figures as well as include the total boardwalk and bridge coverage areas and the RP-2 impact area onto the plan.

4. The initially submitted August 2020 package for this project referenced the use of the Conservation Commission's adopted standard boardwalk design and a two-span wooden bridge design based on the National Park Service standard design, however, no details of these items were provided in the application package. As these design standards change over time and may not be universally suitable for all of these project situations, the applicant should provide details to convey the design intent.
5. The Site Plan includes a brief description and a location dot for each boardwalk and bridge on the 1-inch = 100-foot Site Plan. As this plan scale is very large for the information attempted to be depicted, the application should include an expanded view of each boardwalk and bridge installation to clearly indicate the proposed construction and its limits/impacts.
6. In the August 2020 submission package, the applicant requested a waiver of the 1-foot topographic contour interval within the wetland areas so that the 2-foot mapping interval can be used. Given the scope of the proposed work, we would support the waiver if the construction of each boardwalk and bridge crossing can be clearly articulated based on the 2-foot contour interval mapping.
7. There have been past indications within the application materials that the applicant is discussing the permitting level with the Maine Department of Environmental Protection (DEP) for the proposed wetland impacts. The Town should receive a copy of the eventual DEP prior to the start construction work.
8. Depending on the manner in which the boardwalk and bridges are proposed to be constructed, it is also possible that an U.S. Army Corps of Engineers permit will be required for the project. The applicant should contact the Army Corps to ensure that all the necessary permits have been filed. A copy should be provided to the Town of either an acknowledgement from the U.S. Army Corps of Engineers that an Army Corps permit is not required or an Army Corps permit if one is required.

We trust that these comments will assist the Planning Board in their deliberations on this project's application. Please do not hesitate to contact us with any questions or comments.

Sincerely,
Sebago Technics, Inc.



Stephen D. Harding, P.E.
Town Engineer

SDH:sdh

cc: Phillip Mathieu, CELT