



# Plymouth Engineering, Inc.

8 Main St., Unit C  
Newport, ME 04953  
info@plymouthengineering.com  
tel: (207) 257-2071 fax: (207) 257-2130

May 23, 2023

Project No. 22098

Mr. Bub Fournier  
City of Belfast  
131 Church Street  
Belfast, Maine 04915

## **B&B Midcoast Properties, LLC Proposed Subdivision – Little River Drive, Belfast Preliminary Plan Response to May 16, 2023 Comments**

Dear Mr. Fournier:

Plymouth Engineering, Inc. is pleased to submit the attached information as response to comments regarding the preliminary plan submittal for the Little River Subdivision on Little River Drive in Belfast. We are working with Olver Associates to gather their review comments simultaneously, although it is complicated by the fact that both the DEP and Olver are reviewing the same materials. Hopefully, our submittal meets with both of their approval.

We have copied the narrative of your May 16 email into this document for ease of review.

1. There is no information regarding phasing for this project. It's my understanding that you intend to phase construction. You should add a phasing plan, along with cost estimates to construct roads, utilities and stormwater. The letter from your bank indicating you will be approved for the necessary funding for the project should reference these cost estimates. Typically, a performance bond in the form of an irrevocable letter of credit for 120% of the costs to complete stormwater and road improvements will be required during the Final Plan review. We will ask the City Engineer to verify the cost estimate's accuracy.

**The subdivision will be constructed as the lots are sold. Phase 1 will consist of the following:**

- **The initial road (continuation of Little River Drive)**
- **Construction of Haley and its utilities to the intersection with Matthew**
- **Construction of Marinas Way.**
- **Construction of Mattew to the intersection with Benjamin.**
- **The construction of Benjamin from the intersection of Matthew to the end.**

**The goal is to complete all the infrastructure related to these items that will include the wastewater pump station and force main back to the Little River Road manhole connection. Marinas Way, because of its adjacency to the project beginning will be the first area beyond the Little River Drive extension.**

**The opinion of construction cost for Phase 1 is \$1,780,000. The overall cost estimate for the project is \$3,750,000. As such, the remainder of the project (phase 2) will cost approximately \$1,970,000. The phase 1 cost is slightly weighted proportionally due to the initial road and utility extensions to the site and the pump station.**

2. As we discussed, there are some missing labels (Lot 36) and minor discrepancies in the plans. You should be prepared to answer any questions regarding lot numbers, size, and other areas of concern that may arise at the meeting.

**We've attached a revised subdivision plan with the lot 36 information added and others, including the conservation area clarified. We will attempt to address other questions as they are raised, and changes will be made to the plans in response for final approval.**

3. The standards identified in the attached PUD language should be specifically addressed (section 102-802.5 and 102-804), along with the general zoning standards that you are seeking relief from in the Outside Rural zoning district in which the property is located. You might consider generating a supplemental narrative listing the zoning dimensional standards you are seeking relief from and how the PUD section is being used to make a better project. In the words of Code, the PUD standards are "intended to promote more economical and efficient use of the land while providing a harmonious variety of housing choices, a higher level of amenities, and preservation of natural areas and resources, scenic features, and qualities of open space." The Board does not review many PUD's (or subdivisions) so this would be helpful for them to understand what you are proposing.

**The narrative from section 102.804 is attached.**

4. In regard to traffic, how do the trip generation estimates compare to pre-development conditions on Little River Drive and Lower Congress St, especially at the Rte 1 intersection? I've asked Public Works Director Bob Richards to consider generating a letter that addresses the topic of traffic as well. Section XI c. from the Subdivision Ordinance requires that volume capacity ratio cannot exceed .9 or level of service must not be D or below, but I do not see any pre-development comparison. Also, please address whether or not the increase in traffic triggers any MDOT reviews.

**Below is our traffic estimation based on the ITE Manual. Additionally, we have researched the MDOT data base and found data from a June 9, 2022 traffic count by MDOT. See below.**

**The following table outlines the anticipated traffic generated by the proposed development of the 48 residential lots. Using the 8<sup>th</sup> edition of the ITE manual for single family detached housing (210), COPIES OF WHICH ARE IN Appendix E. The increase in traffic generated by the development will be gradual as the lots are developed.**

	Rate	Total (48 lots)
<b>Weekday</b>	<b>9.57</b>	<b>460</b>
<b>AM Peak</b>	<b>0.77</b>	<b>37</b>
<b>PM Peak</b>	<b>1.02</b>	<b>49</b>
<b>Saturday</b>	<b>10.08</b>	<b>484</b>

**The 2022 MDOT study shows the following:**

<b>Total daily trips at Congress / Route 1 Intersection</b>	<b>1921</b>
<b>AM peak trips at Congress / Route 1 Intersection</b>	<b>202</b>
<b>PM peak trips at Congress / Route 1 Intersection</b>	<b>228</b>

**This suggests that the Little River Subdivision will theoretically generate an 18% increase in AM peak traffic and a 21% increase in PM peak traffic. These numbers are somewhat misleading though. The Congress AM peak is logged by MDOT as 11:00AM to 12:00PM. This will certainly not be the case for the Little River Subdivision where as with most residential developments we will expect the peak to be between 7:00AM and 8:00AM for people going to work or school. In fact that period according to the MDOT study only saw the 7:00AM to 8:00AM traffic count at 136 vehicles, so even with the new peak of 37 from the Little River Subdivision, the total count will be 173. That's 29 vehicles less than the MDOT peak AM traffic. On the PM side, from 4:30PM to 5:30PM the MDOT study saw a total trips of 132, so that in addition to the 49 peak trips from the Little River Subdivision is a total of 181 vs the MDOT peak of 228. These numbers also do not account for any trips from the Little River Subdivision that turn right and further south on Congress from Little River Drive.**

**With regard to traffic on Little River Drive itself, the traffic there is predominantly business based and likely to not peak at the same time as the Little River Subdivision. We believe this is further support of the numbers above and differences in the current peak times from the anticipated project peaks.**

**Traffic movement charts from the MDOT 2022 study are attached. Further, contact with Jon Boyton from the City of Belfast suggests that the Maine DOT is currently considering adding a traffic light at the intersection of Route 1 and Congress Street.**

5. In regard to the off-site sewer upgrades required to accommodate the project, has Annaleis Hafford of Olver Assoc. responded regarding the cost to upgrade the pump station and when will that work occur? I have also asked Mandy Olver of Olver associates to generate a review response for the sewer system proposed in the subdivision's roads and the portion of Little River Drive to be extended. She is also aware that the proposal includes City adoption of all the roads ultimately.

**We received an email from Bub Saunders today that indicates that Olver Associates has determined that the Little River Road pump station does not require upgrade, so that there is no construction or cost implication to this applicant.**

6. In regard to stormwater, I have asked City Engineer Mandy Olver of Olver Associates to generate a review response for the proposed system. I would note that the 50-year standard identified in the City Code was not addressed in the application materials. You will need to address this.

**We are in contact with Olver Associates. As mentioned elsewhere it is always difficult to address questions/concerns from multiple review agencies. The DEP is concurrently reviewing the storm up to the 25-year storm as required by State statute. We have reviewed the 50-year storm and the following table shows the post development 50 year storm will not exceed the flows of the pre development conditions. It is important to note that there are no downstream receiving properties, because this property is immediately upgradient of the Little River.**

	<b>50 year</b>
<b>Pre-Development 1</b>	<b>58.65</b>
<b>Post-Development 1</b>	<b>40.65</b>
<b>Pre-Development 2</b>	<b>69.43</b>
<b>Post-Development 2</b>	<b>47.35</b>
<b>Pre-Development 3</b>	<b>108.95</b>
<b>Post-Development 3</b>	<b>100.99</b>

7. In regard to subdivision's roads, as well as the improvements proposed in the City owned extension of Little River Drive, on May 11<sup>th</sup> I asked both Bob Richards and Mandy Olver to look at the proposal and generate a response.

**We will await their response and prepare documents as necessary.**

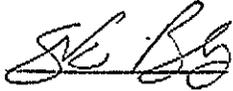
You should reach out to Belfast Fire Chief Patrick Richards ([firechief@cityofbelfast.org](mailto:firechief@cityofbelfast.org)) to request a letter identifying any concerns regarding the project in terms of emergency access and/or the ability to respond to any emergencies.

**We have sent an email to the Chief for input with an invite to the drop box of plans. We have also told him the main sizes proposed and hydrant locations.**

**Additionally, we received a letter of review from the IF&W. There is a deer wintering area located on the site. As stated in his letter, the department is in the process of reevaluating deer wintering areas in this region of the state, as such is quite certain this area will be removed.**

We believe the above addresses the initial round of comments from staff. We stand ready to discuss and respond to comments from the City's contracted engineering firm. We look forward to meeting with the Planning Board to discuss the project. The applicant is anxious to move forward with this exciting new project for them and the City of Belfast.

Sincerely,  
PLYMOUTH ENGINEERING, INC.

A handwritten signature in black ink, appearing to read "S. Braley".

Scott E. Braley, PE  
President

Enc.  
CC B&B Midcoast Properties

## Sec. 102-804. Criteria for approval.

[Ord. of 4-6-2010(3)]

Innovative approaches to planned unit development and cluster housing development design, including building layout, landscaping, and environmental concerns, shall be subject to the following criteria:

- (1) Compliance with zoning regulations. The purpose and intent of this chapter shall be upheld.  
**The majority of the standards of this chapter will be upheld. The applicant is requesting a waiver from the required minimum lot size of the PUD standards.**
- (2) Compliance with other standards. There shall be compliance with all federal, state and local codes, rules, ordinances and regulations.  
**The subdivision is currently under review by the Maine Department of Environmental Protection. The subdivision meets the threshold of a Site Location of Development Act permit.**
- (3) General plan; minimum site area. Each building shall be an element of an overall plan for site development. The area of land to be developed as a planned unit development and cluster housing development shall not be less than five acres.  
**The site is approximately 100 acres, that will be subdivided into 48 lots, that will be no less than 1 acre each, with approximately 7,000 linear feet of road designed and built to City of Belfast standards with sewer, water, and other utilities located underground.**
- (4) Density. The Planning Board shall make a finding determining that the average density of the proposed planned unit development or cluster housing development located in a district with specific density limitations is not in excess of 10 units per acre.  
**The entirety of the lot is 100 acres, with 35% open space. 48 lot on 1000 acres 0.48 lots per acre. 48 lots on 65 acres (subtracting the open space from the available area), that makes the density 0.74 units per acre, which is not in excess of the 10 units per acres standard.**
- (5) Setbacks. Setback standards may be waived, except along the perimeter of the development, as long as the project is in compliance with the average density and open space provisions of this chapter. Setbacks from the perimeters of planned unit development or cluster housing development must comply with setback requirements of the surrounding zoning districts.  
**The proposed setbacks are shown on the attached plans, meet the standards of the PUD of the City of Belfast. No waiver is being requested.**
- (6) Open space and recreation area required. A minimum of 20% of the total project area shall be reserved for recreation. A minimum of 30% of the total project area shall be preserved as open space. Recreation areas may be used in meeting open space requirements. In addition to recreational uses, open space shall be used for other outdoor purposes such as preservation of large trees, tree groves, woods, ponds, streams, wetlands, glens, rock outcrops, native plant life and wildlife cover. The use of any open space may be further limited or controlled at the time of final approval where necessary to protect adjacent properties or uses. Residual open space shall be dedicated to the recreational amenity and environmental enhancement of the development and shall be recorded as such. Such dedications may include private covenants or arrangements to preserve the integrity of open spaces and their use for recreational, environmental, or conservation purposes.  
**There is a proposed 35% open space associated with the proposed subdivision. Included in this open space is the existing Little River Trail. The use of the trail will not be impacted by the development of this subdivision.**

(7) Specific design standards. The developer shall take into consideration the following points, and shall illustrate on the plan the treatment of open spaces, paths, roads, service and parking areas and other features required in his proposal:

a. Aesthetics and orientation. Buildings and other improvements shall respect scenic vistas and natural features as defined in the comprehensive plan.

**The residences will be constructed on individual sites by the purchasers. There is a limited impervious area and landscaped area being proposed per lot.**

b. Streets. Access from public ways, internal circulation and parking shall be designed to provide for vehicular and pedestrian safety and convenience, emergency and fire equipment, snow clearance, street maintenance, and delivery and collection services. Streets shall be laid out and constructed consistent with the provisions of chapter 98.

**The streets within the subdivision have been designed to meet the street standards of the City of Belfast. The fire chief has been contacted to ensure that the design will accommodate fire protection.**

c. Drainage. Adequate provision shall be made for stormwater, with particular concern for the effects of any effluent draining from the site. Erosion resulting from any improvements on the site shall be prevented by landscaping or other means (see sections 102-1123 and 102-1124 and chapter 98).

**The site is under review by the Maine DEP for stormwater quality and quantity. The HydroCAD calculations that have been received by the City show that the post development flows do not exceed the predevelopment flows for the 2-, 10-, 25-, and 50-year storms.**

d. Sewage disposal. Adequate provision shall be made for sewage disposal. If public sewer is unavailable or inadequate, the planned unit development must utilize a private community package system designed in compliance with the state subsurface water disposal rules.

**The sewage disposal will be achieved through the extension of the existing City system located on Little River Drive, and the installation of a pump station within the subdivision. The City Engineer has been contacted and is working with the developer to ensure proper sizing of the onsite pump station, as well as the existing pump station that was already in the process of getting upgraded.**

e. Water supply. Adequate provision shall be made for water for ordinary use as well as firefighting needs.

**The site will be served by municipal water. The superintendent of the water district has been contacted and has verified that there is adequate water available for the foreseeable needs of the subdivision.**

f. Utilities. All utilities shall be installed underground wherever possible. Transformer boxes, pumping stations, and meters shall be located so as not to be unsightly or hazardous to the public.

**The utilities are shown on the previously submitted plans. They will be installed to meet the standards of the City of Belfast.**

g. Recreation. Facilities shall be provided consistent with the development proposal.

**There are no proposed recreation facilities. The existing Little River Trail will be maintained as is, which a portion of is located on the site. All areas that are not proposed for lots or roads will be available for recreational use, but no facilities are proposed.**

h. Buffering. Planting, landscaping, disposition and form of buildings and other improvements, or fencing and screening, shall be utilized to integrate the proposed development with the landscape and the character of any surrounding development.

**The location and orientation of the existing site is screened from adjacent uses and will remain to the greatest extent possible. The lots will be developed, and the portion not constructed upon will be allowed to return to its previously forested condition.**

- i. Disposition of buildings. Disposition of buildings shall recognize the need for natural light and ventilation.

**The lots will be sold with utilities stubbed to the sites. The residences will be constructed on individual sites by the purchasers. There is a limited impervious area and landscaped area being proposed per lot.**

- j. Snow removal. The plan shall provide for storage of snow accumulation or removal from the site.

**There are sufficient areas at the ends of the roads to store snow as necessary.**

- (8) Recording of covenants and conditions. For the purpose of this article, the owners of the tract or parcel of land involved shall agree in advance to be bound by the conditions and regulations which are applicable to the district and to record such covenants, easements and other provisions with the county registrar of deeds.

**A copy of the draft covenants and restrictions was included in the original submittal.**

**They will be revised as needed during the review process before being finalized.**

- (9) Performance guarantee. The developer shall file a performance guarantee with the City at the time of submission of final plans. This may be tendered in the form of a certified check payable to the City, a savings account passbook issued in the name of the City, or a faithful performance bond running to the City and issued by a surety company acceptable to the City. The conditions pertaining to such check, passbook or performance bond shall be determined by the City manager. The amount shall be equal to 110% of the total cost of furnishing, installing, connecting and completing the entire street grading, paving, storm drainage and utilities or other improvements specified in the final plan, and shall guarantee the satisfactory completion of all specified improvements.

**The developer will submit a performance guarantee to the City prior to commencement of construction as required by this section.**

- (10) Dedication of common open space.

**The open space associated with the proposed subdivision will remain under the ownership of the developer with no additional development to be performed. The area is not being proposed for dedication.**

- a. Common open space shall be dedicated after approval of the project. There shall be no further subdivision of the land, or buildings constructed, which would cause an increase in the density of the planned unit development or cluster housing development.
- b. The common open space shall be shown on the development plan with an appropriate notation on the face thereof to indicate that:
  - 1. It shall not be used for future building lots; and
  - 2. A part or all of the common space may, at the option of the City Council, be dedicated for operation as a municipal recreation facility.

- (11) Neighborhood association.

**There is no neighborhood association proposed.**

- a. If any or all of the common open space is to be reserved for use by the residents or owners, the formation and incorporation by the developer of a neighborhood association shall be required prior to final plat approval.
- b. Covenants for mandatory membership in the association, setting forth the owners' rights and interest and privileges in the association and the common land, shall be approved by the Planning Board and included in the deed for each lot or dwelling unit.

- c. The neighborhood association shall have the responsibility of maintaining the common open space, as well as road maintenance, parking lot maintenance, snow removal and maintenance of recreational facilities/areas.
- d. The association shall levy charges against all property owners to defray the expenses connected with the maintenance of open space, neighborhood recreational facilities, road maintenance, maintenance of landscaping of buffers and landscaping noted on the final plan, and City assessments.
- e. The developer/applicant shall maintain control of such open space and be responsible for its maintenance until the development is sufficient to support the association, or, alternatively, the objectives of the planned unit development have been met. Such determination shall be made by the Planning Board upon request of the neighborhood association or the developer/applicant.

**Time Period:**

- All times
- AM Peak Hour: 11:00 - 12:00
- PM Peak Hour: 15:00 - 16:00
- Overall Peak Hour: 15:00 - 16:00
- Custom:  -

**Traffic Bins:**

- Mcl
- Car
- Bus
- SUT
- Semis
- Bicycle

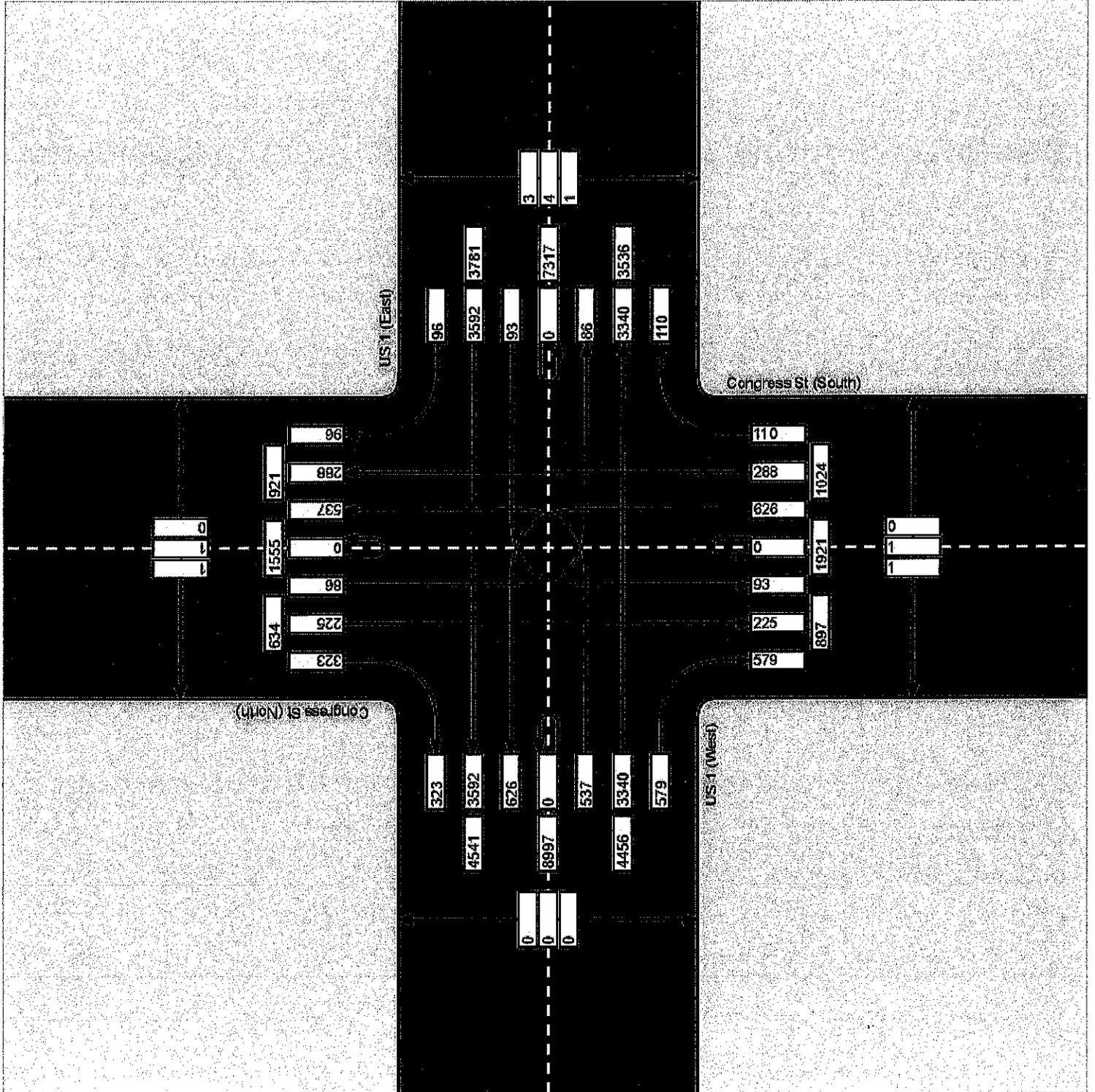
All - None - Toggle

**Crossing Bins:**

- Bicycle
- Ped

All - None - Toggle

Traffic total: 9895



**Time Period:**

- All times
- AM Peak Hour: 11:00 - 12:00
- PM Peak Hour: 15:00 - 16:00
- Overall Peak Hour: 15:00 - 16:00
- Custom:  -

**Traffic Bins:**

- Mcd
- Car
- Bus
- SUT
- Sem's
- Bicycle

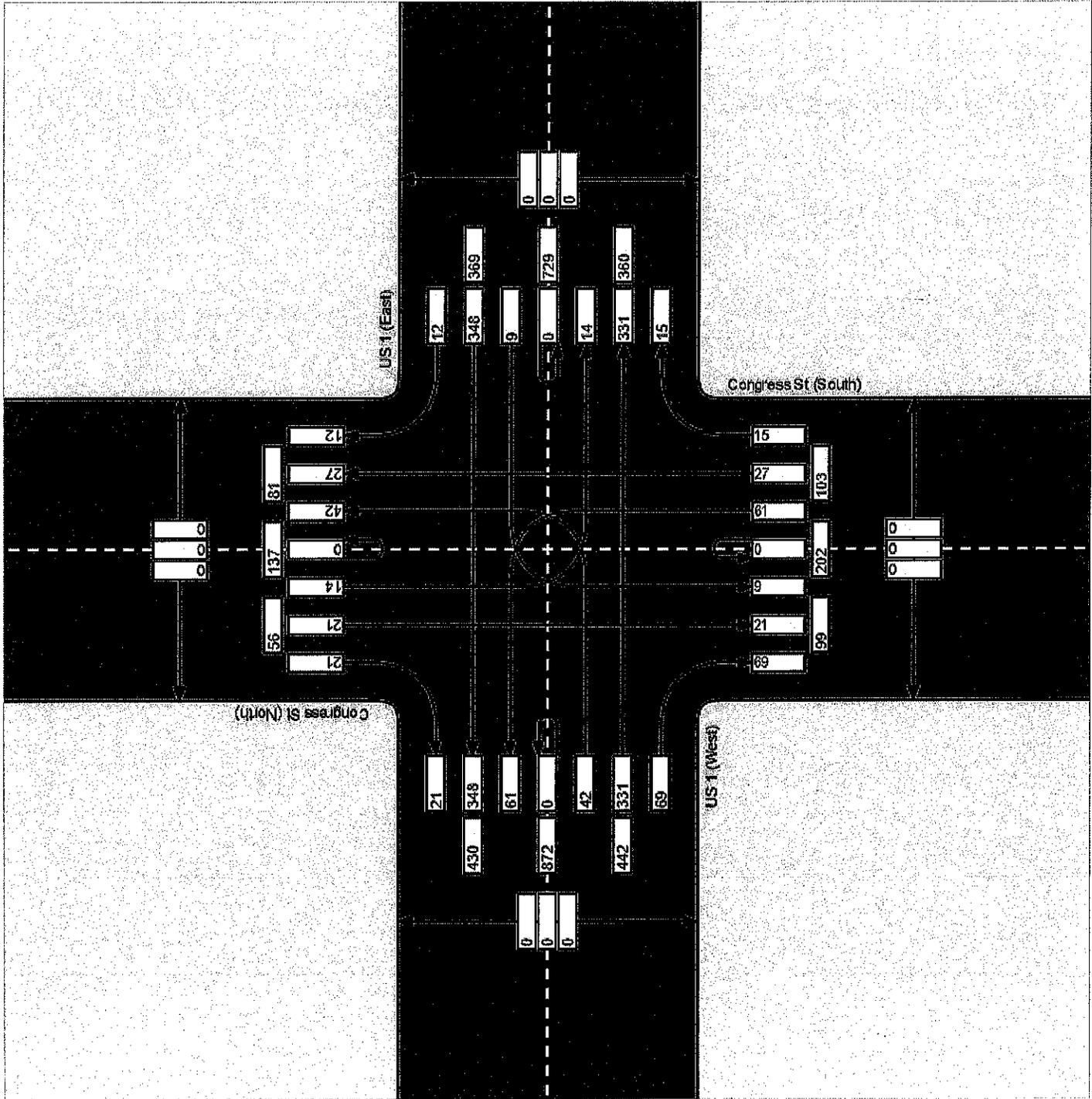
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**Crossing Bins:**

- Bicycle
- Ped

All - None - Toggle

Traffic total: 970





**Time Period:**

- All times
- AM Peak Hour: 11:00 - 12:00
- PM Peak Hour: 15:00 - 16:00
- Overall Peak Hour: 15:00 - 16:00
- Custom:  -

**Traffic Bins:**

- Mtd
- Car
- Bus
- SUT
- Semis
- Bicycle

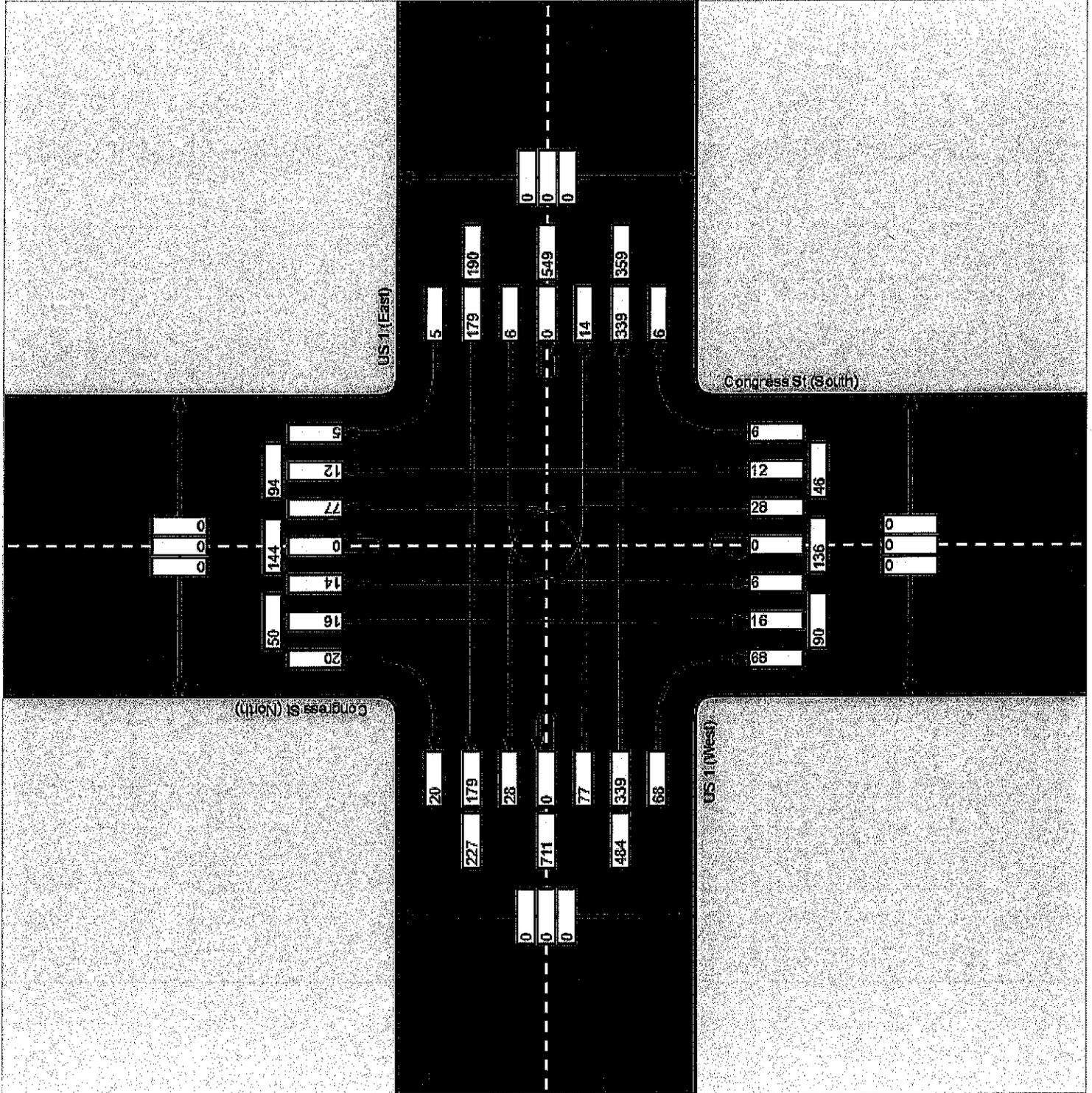
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**Crossing Bins:**

- Bicycle
- Ped

All - None - Toggle

Traffic total: 770







JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF  
INLAND FISHERIES & WILDLIFE  
353 WATER STREET  
41 STATE HOUSE STATION  
AUGUSTA ME 04333-0041



JUDITH CAMUSO  
COMMISSIONER

May 22, 2023

Aimee Young  
Plymouth Engineering  
P.O. Box 46, 30 Lower Detroit Road  
Plymouth, ME 04969

**RE: Information Request – Residential Subdivision, Belfast Project**

Dear Aimee:

Per your request received on April 18, 2023, we have reviewed current Maine Department of Inland Fisheries and Wildlife (MDIFW) information for known locations of Endangered, Threatened, and Special Concern species; designated Essential and Significant Wildlife Habitats; and inland fisheries habitat concerns within the vicinity of the *Residential Subdivision, Belfast* project.

Our Department has not mapped any Essential Habitats that would be directly affected by your project.

***Endangered, Threatened, and Special Concern Species***

Bat Species – Of the eight species of bats that occur in Maine, the three *Myotis* species are protected under Maine’s Endangered Species Act (MESA) and are afforded special protection under 12 M.R.S §12801 - §12810. The three *Myotis* species include little brown bat (State Endangered), northern long-eared bat (State Endangered), and eastern small-footed bat (State Threatened). The five remaining bat species are listed as Special Concern: big brown bat, red bat, hoary bat, silver-haired bat, and tri-colored bat. While a comprehensive statewide inventory for bats has not been completed, based on historical evidence it is likely that several of these species occur within the project area during migration and/or the breeding season. However, our Agency does not anticipate significant impacts to any of the bat species as a result of this project.

***Significant Wildlife Habitat***

Deer Wintering Areas - A mapped Deer Wintering Area occurs within the project review area. The need and value of Deer Wintering Areas vary across the State according to factors such as the population of deer in relation to species management objectives, habitat quality and quantity, and the severity of winter conditions. MDIFW is currently reevaluating and removing many historical Deer Wintering Areas in this region of Maine based on the factors noted above.

Inland Waterfowl Wading Bird Habitat (IWWH) – This project area may intersect with an IWWH, which is considered Significant Wildlife Habitat under Maine’s Natural Resources Protection Act. These habitats provide important breeding, feeding, migration, staging, and wintering habitat for waterfowl and wading bird species. Both high and moderate value IWWHs include both the wetland complex and a 250-foot upland zone. We recommend that these resources be avoided, including no clearing within the 250-foot upland zone from the wetland edge.

Significant Vernal Pools - At this time, MDIFW Significant Wildlife Habitat maps indicate no known presence of Significant Vernal Pools in the project search area; however, a comprehensive statewide inventory for Significant Vernal Pools has not been completed. If surveys for vernal pools have not yet been conducted, we recommend that surveys for vernal pools be conducted within the project boundary by qualified wetland scientists prior to final project design to determine whether there are Significant Vernal Pools present in the area. These surveys should extend up to 250 feet beyond the anticipated project footprint because of potential performance standard requirements for off-site Significant Vernal Pools, assuming such pools are located on land owned or controlled by the applicant. Once surveys are completed, survey forms should be submitted to our Agency for review well before to the submission of any necessary permits. Our Department will need to review and verify any vernal pool data prior to final determination of significance.

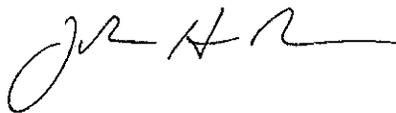
Fish Habitat - We generally recommend maintaining 100-foot undisturbed vegetated buffers from the upland edge of all intermittent and perennial streams and any contiguous wetlands. Maintaining and enhancing buffers along these resources is critical to the protection of water temperatures, water quality, natural inputs of coarse woody debris, and various forms of aquatic life necessary to support fish and other aquatic species. Riparian buffers also provide critical habitat and important travel corridors for a variety of wildlife species. Stream crossings should be avoided, but if a stream crossing is necessary, or an existing crossing needs to be modified, it should be designed to provide for full aquatic passage. Small streams, including intermittent streams, can provide crucial rearing habitat, cold water for thermal refugia, and abundant food for juvenile salmonids on a seasonal basis. Undersized crossings may inhibit these functions and become a frequent maintenance problem that causes reoccurring damage to the resource. Generally, MDIFW recommends that all new, modified, and replacement stream crossings be sized to span at least 1.2 times the bankfull width of the stream. In addition, we generally recommend that stream crossings be open bottomed (i.e. natural bottom), although embedded structures which are backfilled with representative streambed material have been shown to be effective in providing habitat connectivity for fish and other aquatic organisms. Construction Best Management Practices should be closely followed to avoid erosion, sedimentation, alteration of stream flow, and other impacts as eroding soils can travel significant distances as well as transport other pollutants resulting in direct impacts to fish, other aquatic life, and their habitats. In addition, we recommend that any necessary instream work occur between July 15 and October 1.

This consultation review has been conducted specifically for known MDIFW jurisdictional features and should not be interpreted as a comprehensive review for the presence of other regulated features that may occur in this area. Prior to the start of any future site disturbance we recommend additional consultation with the municipality, and other state resource agencies including the Maine Natural Areas Program and Maine Department of Environmental Protection in order to avoid unintended protected resource disturbance.

Letter to Aimee Young, Plymouth Engineering  
Comments RE: Residential Subdivision, Belfast  
May 22, 2023

Please feel free to contact my office if you have any questions regarding this information, or if I can be of any further assistance.

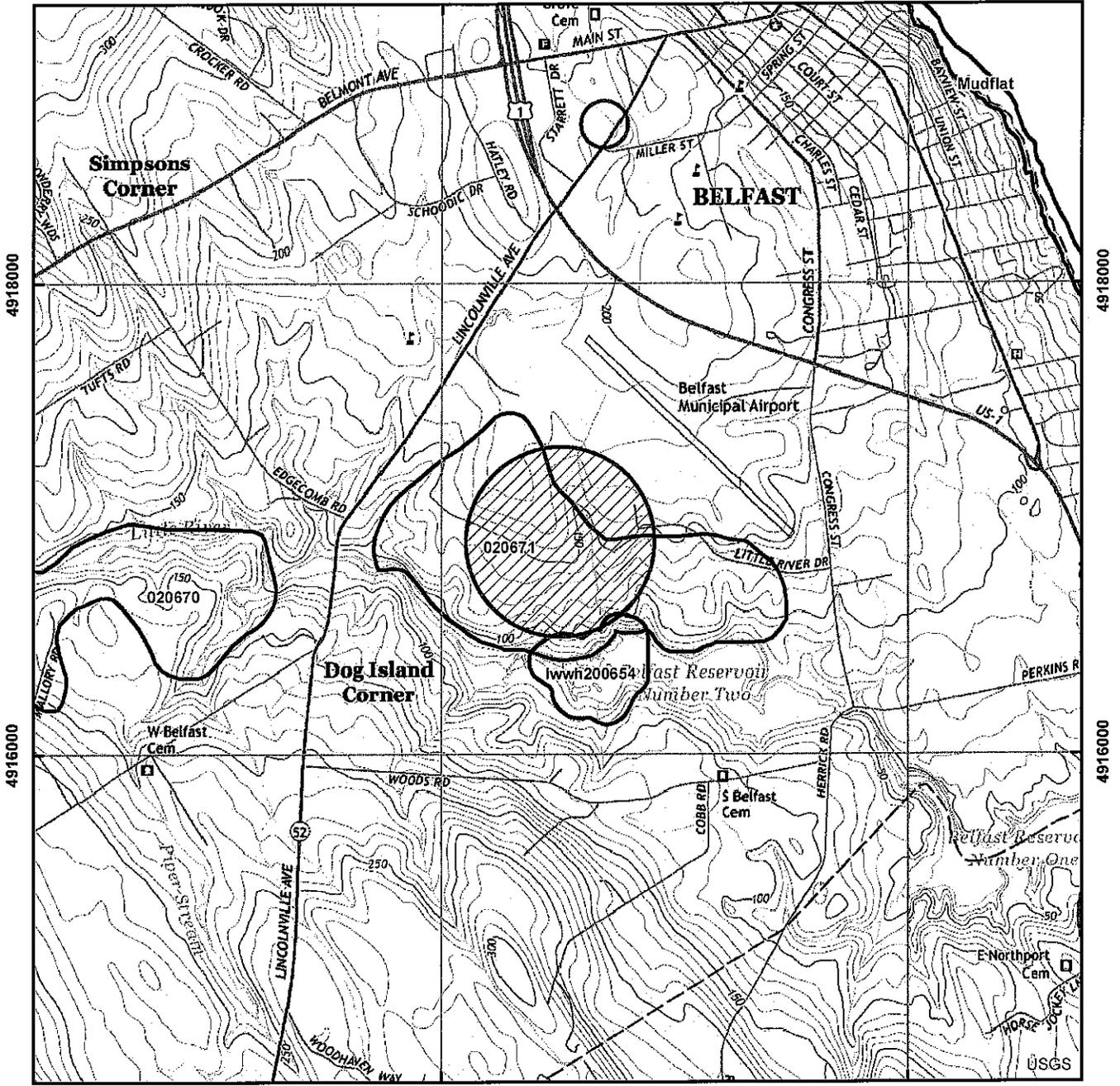
Best regards,

A handwritten signature in black ink, appearing to read 'John Perry', with a long horizontal flourish extending to the right.

John Perry  
Environmental Review Coordinator

498000

500000



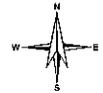
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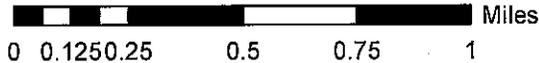


### Environmental Review of Fish and Wildlife Observations and Priority Habitats

Project Name: Residential Subdivision, Belfast (Version 2)



Maine Department of Inland Fisheries and Wildlife



Projection: UTM, NAD83, Zone 19N

Date: 5/1/2023

	ProjectSearchAreas - All Versions		Deer Winter Area		Roseate Tern
	Maine Cliff and Talus Areas		LWPC p-fw		Piping Plover and Least Tern
			Seabird Nesting Islands		Aquatic ETSc - 2.5 mi review
			Shorebird Areas		Rare Mussels - 5 mi review
			Inland Waterfowl and Wading Bird		Maine Heritage Fish Waters
			Tidal Waterfowl and Wading Bird		Arctic Charr Habitat
			Significant Vernal Pools		Redfin Pickerel and Swamp Darter Habitats - buffer100ft
	Environmental Review Polygons				Special Concern occupied habitats - 100ft buffer
					Wild Lake Trout Habitats

