

May 19, 2008

Planning and Development Department  
City of Portland  
389 Congress Street  
Portland, Maine 04101

Re: Double Barracks and Hospital buildings—Great Diamond Island

Dear Chairwoman Tevanian and Members of the Portland Planning Board:

It has come to our attention that you have before you a proposal to develop a 34-unit residential hotel condominium, each with its own kitchen unit and bathroom facilities, on Great Diamond Island. Friends of Casco Bay/Casco BAYKEEPER®, as an advocate for the environmental health of Casco Bay, is concerned that any proposed system for sewage and gray water treatment and disposal does not negatively impact the water quality of Casco Bay.

Our concern is with the safe and clean disposal of solid and septic wastes. We are quite concerned that the developers expect to use the existing overboard discharge system for the proposed project. After the City recently voted to expend nearly \$61 million to upgrade its sewage transport infrastructure to protect the bay, it does not seem reasonable to allow this development by the Inn at Great Diamond Island to occur until and unless the City and the Maine Department of Environmental Protection (DEP) have been assured that there will be adequate safeguards to ensure that additional wastes do not overload the island's minimally adequate Overboard Discharge System. We believe this system is already close to capacity with just the existing development, given its age and unknown maintenance history.

Currently, Great Diamond Island has a MEPDES permit to discharge 35,000 GPD, of secondary treated sanitary wastewater from its overboard discharge system. This was reduced from 40,000 GPD in 2005 by the DEP because of the age of the system and some outstanding maintenance issues. By some estimations, even adding just the first 22 units of the proposed 34 will exceed the current capacity of the sand filter beds. This is complicated by the fact that there is significant infiltration of groundwater, which increases the amount of water that the sand filter system must treat.

We have several questions that we would appreciate your considering as you evaluate the proposed development:

1. How do the developers propose to incorporate advances in sewage treatment that have been made in the two decades since the first phase of development on Great Diamond Island was approved?

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2. Will the developers, should they integrate their wastewater treatment with the existing facilities, dig up and clean out the sand filters that have serviced the island community for over 20 years? The original system must have been installed around the time that Phase I was approved in 1986. We have been told by the DEP that a typical septic system has a life expectancy of about 20-25 years. If the tank is not pumped on a regular basis, and grease is allowed to get out into the bed, then it may need to be rebuilt much sooner.
3. What other maintenance will the developers undertake before adding more units to the existing infrastructure? In 2005, the DEP ordered maintenance on all three sand filter beds. They noted the need to stop water pooling and to re-establish the geotextile fabric and loam cover over the beds. Has this been done? Although Overboard Discharges purportedly provide secondary treatment, they need frequent maintenance and inspection in order to operate efficiently.
4. In 2005, the DEP wrote in the MAINE WASTE DISCHARGE LICENSE FACT SHEET for the Great Diamond Island discharge, "Because the reserve life for the sand filters was originally established at seven years and two of the sand filters have operated over 15 years to date without any replacement, the sand filters (and other equipment) may need replacement in the near future. Special Condition M of this permit requires the permittees to submit a report and list of work items with a specific schedule to perform the necessary repairs to the treatment system."

Has the developer prepared a comprehensive assessment of the proposed plan for the disposal of solid and septic wastes?

Since 1987, the installation of Overboard Discharges is no longer permitted, as regulators recognized how inadequate these treatment systems are. We would prefer that the entire Great Diamond Island community find a more effective method of sewage treatment, and we would oppose any more stress on a system that we view as already antiquated.

We could not attend the May 13<sup>th</sup> workshop, but we look forward to commenting and participating in upcoming workshops and hearings on the issue, both before the Planning Board and the City Council.

Thank you for your consideration of our concerns.

Sincerely yours,

Joseph E. Payne  
Casco **BAYKEEPER**®