

Comments to the Planning Board – P&K Gravel Contract Zone Application

Submitted by: Tom McCarthy, Chairman, Casco Water Quality Committee **Date:** June 22, 2026

Overview

P&K Gravel has historically been responsible stewards of the land and water surrounding the Heath Quarry. However, the current Contract Zone Application raises several concerns related to **water quality, wetland protection, aquifer integrity, and habitat impacts**, particularly regarding Inland Waterfowl and Wading Bird Habitats (IWWH).

Key Environmental Concerns

1. Proximity to Sensitive Water Resources

- The current quarry operations extend up to the **Shoreland Zone of Hog Meadow Pond**.
- The proposed addition of parcels **9-25-B and 9-31** includes **all of Hog Meadow Pond** and significant surrounding wetlands.
- The **north end of Crescent Lake**, just south of Route 11, is a **significant sand and gravel aquifer**, requiring careful protection.

Requests for Additional Information

2. Pit Depth and Future Expansion

- What is the current depth of the pit?
- Are there plans or intentions to excavate deeper?

3. Monitoring Wells

- Are monitoring wells present on the property?
- If so:
 - How deep are they?
 - How frequently is water tested?
 - Is long-term water quality data available?

4. Abutter Wells

- What are the depths of abutting property wells?
- Is water quality testing conducted for abutters?
- Is long-term data available?

5. Surface Water Quality

- Has water quality testing been conducted for **Hog Meadow Pond** and **The Heath**?
- Is any trend analysis available?

6. Stormwater Management

- What is the stormwater management plan?
- What rainfall intensity is it designed to handle?
- This plan—approved by a qualified agency—should be included in the **Contract Zone Agreement (CZA)**.

7. DEP Variance for Stormwater Discharge

- Where is stormwater discharged under the DEP variance?
- Is there logging of discharge events and quantities?
- Is post-discharge water quality testing performed?

8. Sedimentation and Erosion Control

- Please provide a copy of the sedimentation and erosion control plan.
- This plan—approved by a qualified agency—should also be included in the **CZA**

9. Reclamation Plan

- The reclamation plan approved by the Town of Casco should be incorporated into the **CZA**.

Consistency with the Comprehensive Plan

The application states compatibility with the Comprehensive Plan under the goal to “attract local business.” However, the application does **not** address compatibility with:

- **Section 2:** High Value Plant and Animal Habitat
- **Section 5:** Water and Natural Resources

Given that the Heath Quarry lies within a **Significant Inland Waterfowl and Wading Bird Habitat**, P&K should explain:

- How these resources are currently protected
- How they will be protected under expanded operations

Contract Zone Agreement (CZA) Requirements

10. Surety Bond

- Has P&K posted a surety bond with the Town of Casco to ensure compliance with approval conditions?

11. Ownership Changes

- The CZA should specify that it is valid **only under current ownership**.
- Any change in ownership should require renegotiation with the Town of Casco.

12. Enforcement and Revocation

- The CZA should include provisions for:
 - Regular review
 - Enforcement actions
 - Potential modification or removal of the CZA in the event of violations

• Conclusion

- These questions and requests aim to ensure that the proposed Contract Zone protects Casco's lakes, wetlands, aquifers, and wildlife habitats while maintaining transparency and accountability in quarry operations.