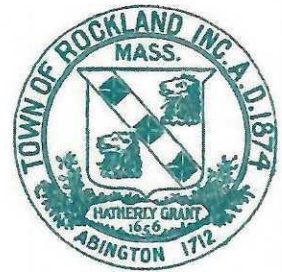




ABINGTON & ROCKLAND JOINT WATER WORKS

366 CENTRE AVENUE
ROCKLAND, MASSACHUSETTS 02370



ABINGTON COMMISSIONERS

JOHN S. TASSINARI, JR.
CHAIRMAN

ROBERT L. TOOMEY, JR.

WILLIAM CORMIER, JR.

TELEPHONE (781) 878-0901

FAX (781) 982-8332

kcameron@abrockwater.com

KRISTEL CAMERON
SUPERINTENDENT

ROCKLAND COMMISSIONERS

ROBERT CORVI, JR.

DEBORAH L. DOONER
SECRETARY

DAVID SAUCIER

May 30, 2023

Rockland Zoning Board of Appeals
Town Hall
242 Union Street
Rockland, MA 02370

RE: Shinglemill Apartments
0 Pond Street and 152 Wilson Street, Rockland, MA
Abington Rockland Joint Water Works Comments

Members of the Rockland Zoning Board of Appeals

I am writing on behalf of the Abington Rockland Joint Water Works (ARJWW) to express our concern regarding the potential negative impacts of the proposed Shingle Mill project. As you are aware, the ARJWW is responsible for providing public drinking water to the Town of Rockland. We have reviewed the proposed Comprehensive Permit Plans dated April 14, 2023, and offer the following comments:

1. The plans show numerous groundwater recharge basins for stormwater recharge. Appendix D of the Stormwater Management Report (Proposed Long Term Pollution Prevention Plan) indicates Good Housekeeping Practices, Provisions for Storing Materials and Waste Products Inside and Under Cover, and Vehicle Washing Controls. However, these brief standard operating procedures do not effectively guarantee that liquid wastes from vehicles (antifreeze, oils, brake fluids, transmission fluids) will not accumulate on the asphalt in parking areas and be washed into the stormwater system during storm events. According to 310 CMR 22.20C (2)(i) – motor vehicle repair operations are not permitted within a Zone A. The noted Long Term Pollution Prevention Plan SOPs are insufficient regarding actual details for how any vehicle maintenance, vehicle washing/cleaning, and spills of liquid wastes will be monitored, policed, managed, and/or prohibited as required within a Zone A. Liquid wastes from future potential vehicle maintenance and vehicle parking/storage pose a significant threat to the quality of the water supply. More robust details on prohibiting and preventing any



ABINGTON & ROCKLAND JOINT WATER WORKS

366 CENTRE AVENUE
ROCKLAND, MASSACHUSETTS 02370



ABINGTON COMMISSIONERS

JOHN S. TASSINARI, JR.
CHAIRMAN

ROBERT L. TOOMEY, JR.

WILLIAM CORMIER, JR.

TELEPHONE (781) 878-0901

FAX (781) 982-8332

kcameron@abrockwater.com

KRISTEL CAMERON
SUPERINTENDENT

ROCKLAND COMMISSIONERS

ROBERT CORVI, JR.

DEBORAH L. DOONER
SECRETARY

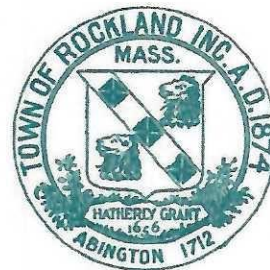
DAVID SAUCIER

- potential for liquid wastes from motorized vehicles to enter the stormwater management system need to be provided.
2. It is unclear if chemicals will be used for de-icing the parking areas in the winter. As noted on Sheet 8, several parking areas are located within the Zone A of Rockland's water supply. According to 310 CMR 22.20C (2)(f) the following activities are prohibited within a Zone A "storage or disposal of snow or ice, removed from highways and streets outside the Zone A, that contains deicing chemicals;". When the snow is cleared from the parking areas, where will it be pushed or transported to? The use of de-icing chemicals should be prohibited in all areas of the proposed development.
 3. Please provide details on how the following Zone A restriction of 310 CMR 22.20C (2)(1) is being met "land uses that result in the rendering impervious of more than 15%, or more than 20% with artificial recharge, or 2500 square feet of any lot, whichever is greater;".
 4. It is our understanding that the project proponent is planning to test and permit the use of on-site groundwater supply wells. Based on the proximity to the Abington/Rockland Joint Water Works water supply reservoir, we are concerned that any groundwater withdrawals will reduce the safe yield of our surface water supply. Therefore, if on-site wells are planning to be used, we request that the project proponent complete groundwater modeling and/or Firm Yield Estimator calculations which demonstrate that there will be no negative impacts or reductions in the Safe Yield of the Hingham Street water supply reservoir.
 5. The Abington/Rockland Joint Water Works consider this proposed project to be a serious and significant threat to the Town's water supply. The project is practically surrounded by the Zone A for the Town's water supply and wetlands (encompassing > 90% of the project site). It is preposterous to assume that there will be no degradation or negative impacts on the Town of Rockland Water Supply resulting from this proposed development. As such, the Abington/Rockland Joint Water Works is requesting that the Zoning Board of Appeals (ZBA) require the project proponent to complete a hydrologic study/model of the proposed development to demonstrate that the fate and transport of potential contaminants generated from the development do not pose a threat to the public water supply.



ABINGTON & ROCKLAND JOINT WATER WORKS

366 CENTRE AVENUE
ROCKLAND, MASSACHUSETTS 02370



ABINGTON COMMISSIONERS

JOHN S. TASSINARI, JR.
CHAIRMAN

ROBERT L. TOOMEY, JR.

WILLIAM CORMIER, JR.

TELEPHONE (781) 878-0901

FAX (781) 982-8332

kcameron@abrockwater.com

KRISTEL CAMERON
SUPERINTENDENT

ROCKLAND COMMISSIONERS

ROBERT CORVI, JR.

DEBORAH L. DOONER
SECRETARY

DAVID SAUCIER

Therefore, we are not in favor of the ZBA granting any waivers for this project as the proposed project represents a secondary threat to one of the Town's most precious resources. From a volume perspective, we are in the process of evaluating the ability of our system to support this project with public drinking water while maintaining service to our existing customers and staying in compliance with our Water Management Act withdrawal permit.

Please feel free to contact me at (781) 878-0901 if you have any questions or require additional information. I can also be reached via e-mail at KCameron@abrockwater.com.

Very Truly Yours,
Abington Rockland Joint Water Works

Kristel Cameron
Superintendent