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May 30, 2023

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

Subject: Shinglemill – Chapter 40B Comprehensive Permit

Dear Zoning Board of Appeals:

This is to advise that we have reviewed the following documents related to the proposed Shinglemill Chapter 40B development off Pond Street:

- Shinglemill Apartments Comprehensive Permit Plans (32 sheets), revised April 26, 2023, prepared by Coneco Engineers & Scientists (Coneco)
- Stormwater Management Report, revised April 26, 2023, prepared by Coneco
- Response to Nover November 11, 2022 Comments letter from Coneco, dated April 26, 2023
- Letter from Chairman of the Rockland Sewer Commission, dated May 11, 2023
- Letter from Police Chief Zeoli, dated May 11, 2023
- Email from Highway Superintendent, dated May 2, 2023

The documents have been revised to address comments contained in previous peer review letters, email correspondences, and meetings. Based on my review of the documents I offer the following comments:

1. An updated list of waivers should be provided to reflect the design shown on the current plans.
2. An updated mass balance analysis should be provided to reflect the design shown on the current plans.
3. Landscape plans should be updated to reflect the design shown on the current plans.
4. The project as proposed will require the Applicant to file an Environmental Notification Form (ENF) with the Massachusetts Environmental Policy Act (MEPA) since it will trigger the MEPA Review Threshold 301 CMR 11.03(6)(b)(14). This requires submission of an ENF for a project that will generate 1,000 or more new average daily trips on roadways providing access to a single location and construction of 150 or more new parking spaces at a single location. The project proposes 299 parking spaces and 199 residential units, which will generate 1,082 average daily trips to this location.

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5. A portion of the proposed sewer main that would convey sewage from the development to the Rockland Sewer System would pass through the Zone A Surface Water Protection area tributary to the Rockland Reservoir. This is not allowed by 310 CMR 22.20B(3)(b) which reads *“all sewer lines and appurtenances are prohibited, except as required to eliminate existing or potential pollution to the water supply, or where the crossing of tributaries is necessary to construct a public sewer system.”* The proposed sewer line does not meet either of the two exceptions listed.
 - a. It is not required to *eliminate existing or potential pollution to the water supply* because there is no existing pollution, related to sewage in the area that the line would be installed and without a sewer line in that location there is no potential source of pollution that the line would eliminate.
 - b. Installation of the line would serve a private development and should not be considered a public sewer system.
6. Based on Chairman Heshion’s May 11, 2023 letter, the Sewer Commission has not approved a municipal sewer connection for the project. Without a connection to the municipal sewer system the project cannot be built. We understand that there is a moratorium on new connections to the sewer system which is the result of an Environmental Protection Agency (EPA) Order (Docket No. CWA-AO-R01-FY22-05). To ensure compliance with the EPA Order we recommend that the Board not entertain any request for relief from Sewer Department/Commission fees and regulations.
7. We understand that the Applicant is proposing to provide domestic water supply with onsite wells and that fire protection would be provided by the Abington-Rockland Joint Water Works system. Documentation should be provided to demonstrate that there will be adequate water supply for fire protection (hydrant flow tests and hydraulic modeling). Documentation should also be provided to demonstrate that the onsite wells will provide adequate water supply in both quantity and quality of water.
8. As noted in the April 26, 2023, Coneco letter, the Applicant has withdrawn its Notice of Intent application to the Conservation Commission until the ZBA issues its decision on the project. The Applicant is seeking waivers from the Rockland Wetland Protection Bylaw (Chapter 407). Chapter 407 has a 25-foot ‘no-touch’ buffer and defines the 100-foot buffer to wetlands as a resource area. Almost the entire access road is within the 25-foot ‘no-touch’ buffer and much of the project is within the 100-foot buffer to wetlands. We request that the Applicant’s engineer provide the total area of disturbance and the total proposed impervious area within the 25-foot ‘no-touch’ and 100-foot buffers to wetlands so that we may assess the impacts.
9. The locations of the proposed dumpster pads will require trash trucks to back up long distances which could pose safety concerns with pedestrians. The pad location south of the ‘L’ building will require the truck to back up over 225 feet and the pad location south of the ‘bar’ building will require the truck to back up about the same distance and around a ninety-degree corner. We note that in a previous submittal, the Applicant indicated that open dumpsters would not be proposed in lieu of trash compactor rooms.
10. There appears to be a proposed concrete sidewalk adjacent to a Cape Cod berm between the ‘bar’ building and the emergency access drive toward Wilson Street. We recommend that there be a vertical concrete curb to better separate pedestrians from vehicular traffic.

We note that there is another section of Cape Cod berm adjacent to concrete sidewalk off the northeast corner of the 'L' building, however, this is the Fire Department emergency access location for access to the rear of the building and the curb needs to be mountable for fire and emergency apparatus to gain access.

11. There are some discrepancies between plans and cross sections, where the plans show vertical concrete curb (or monolithic concrete curb and sidewalk) but the cross sections show Cape Cod berm and granite curb in some locations.
12. Proposed inspection ports for the subsurface chamber systems should be a minimum of six-inch diameter.
13. The proposed Cape Cod berm should be placed monolithically with both pavement courses so that stormwater may be controlled during the time between placement of pavement courses.
14. We recommend a minimum of six inches of reclaimed asphalt (M1.09.0 or M1.10.0) for the emergency access roads rather than four inches of 1-1/2" crushed stone.
15. The proposed downspout emergency overflow should be a few inches above finished grade to prevent surface water from entering the system.
16. It appears that all of the proposed sidewalks are to be cement concrete but there is a Bituminous Concrete Sidewalk detail on Sheet 29.
17. The drawdown time calculation for Chamber System A should be based on the infiltration rate of 2.41 inches per hour.
18. The Long Term Pollution Prevention Plan included in the Stormwater Management Report notes that snow storage areas are shown on the plans. We have not seen where these areas are shown.
19. While reviewing the drainage calculations, we noted some discrepancies between the HydroCAD model and the plans. Coneco sent us the HydroCAD files for the project so we were able to correct the discrepancies and are satisfied that the proposed stormwater system will adequately mitigate post-development runoff and will be in compliance with the MassDEP Stormwater Management Standards.

Should you have any question, please give us a call.

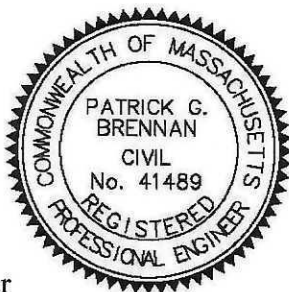
Very truly yours,

PGB Engineering, LLC

By:



Patrick G. Brennan, P.E.



PGB

cc: Dave Taylor
Henry Nover