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July 14, 2023

Robert Rosa, Chairman
Town of Rockland Zoning Board of Appeals
242 Union Street
Rockland, MA 02370

RE: Response to PGB Engineering Comments dated May 30, 2023
Shinglemill Apartments – September 2022 Submission
75-79 Pond Street, Rockland, MA

Dear Mr. Rosa and Members of the Board

On behalf of our client, Shinglemill, LLC, Coneco Engineers & Scientists, Inc. (Coneco) is pleased to submit revised Comprehensive Permit Plans (Plans) and supporting documentation for the proposed development located at 75-79 Pond Street Rockland, Massachusetts. These documents address the comments contained within the peer review letter from PGB Engineering, to the Town of Rockland Zoning Board of Appeals (ZBA), dated May 30, 2023.

As an aid to the reader the comments are included in *italicized text* followed by Coneco responses in plain text

1. *An updated list of waivers should be provided to reflect the design shown on the current plans.*

CONECO RESPONSE
Please find the updated list of waivers within the supplemental documents provided.

2. An updated mass balance analysis should be provided to reflect the design shown on the current plans.

CONECO RESPONSE
Please find the updated mass balance analysis (Cut/Fill Report) within the supplemental documents provided.

3. Landscape plans should be updated to reflect the design shown on the current plans.

CONECO RESPONSE
Please find the updated Landscaping plans within the supplemental documents provided.

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.

CONECO RESPONSE
A filing with MEPA requires both a State Action and a Threshold Exceedance. To the applicant's knowledge the project as proposed does not have a Threshold Exceedance. Please find the updated

Memorandum from McMahon within the supplemental documents provided. Per this memorandum the estimated total average daily trips generated by this facility will be 904. Therefore, an ENF filing with MEPA is not required per the referenced threshold. If any thresholds or triggering components are met for the project, an ENF filing with MEPA will be performed.

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.

CONECO RESPONSE

The applicant contends that both of these exemptions apply towards the project.

As quoted from the State Environmental Code, the sewer connection would eliminate "potential pollution" that could come from an onsite wastewater treatment system. While an onsite wastewater treatment system would have its own obstacles to be constructed and overcome, we believe that a connection to the sewer that exists within the Zone A would be an elimination of the "potential pollution" from an alternative system.

All town sewer systems are a public system providing a service to the residents of the town. The proponent will be tying a proposed Mass Housing supported residential development into the existing town sewer system. This Mass Housing supported residential development will offer a wide range of living choices for all income levels and provide the opportunity to live and work in Rockland, specifically, and Massachusetts, in general. The purpose of tying into the existing town sewer system is to minimize and avoid future potential impacts to the adjacent wetlands and the surface water supply associated with a subsurface septic system that would be required otherwise on-site. Approximately 86 l.f. of the proposed sewer extension is within Surface Water Supply Protection Zone A. Only 10 l.f. of that extension is in the Cedar Drive private way. The remaining 76 l.f. is within the Wilson Street public right-of-way. It should also be noted that there is approximately 357 l.f. of existing sewer line within the Zone A on Wilson Street, which includes the connections from private homes. The proposed connection to the existing sewer manhole from this project will be constructed in concrete to ensure no leaking of the system into ground water.

As an alternative to the connection through Wilson Street, the applicant has provided an option for a connection to the sewer line within Colby Street instead. Please see the Sewer Connection Alternatives plan included with this submission for further information on this alternative. The installation of the sewer line extension down Wilson is preferred since the installation alignment is already paved or disturbed. The installation of the sewer line from Colby Street will involve the cutting of trees and shrubs and excavation in previously undisturbed areas within the buffer zone to Bordering Vegetated Wetland and a Vernal Pool.

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.

CONECO RESPONSE

The Applicant is not requesting any relief from the Sewer Department/Commission fees and regulations. Further, the Applicant acknowledges that no connection to, or extension of the public sewer system shall be permitted until the Sewer Department and/or Commission reviews and approves the same.

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.

CONECO RESPONSE

Hydrant flow tests were performed by John Hoadley and Sons, Inc. on 8/6/2018 for the hydrants at 116 Pond Street and 152 Wilson Street. The report document has been included in this submission. The applicant's mechanical engineer, Wozny/Barbar & Associates, Inc., has performed a preliminary review of this testing and communicated to the applicant that the water system should be sufficient to supply fire protection throughout the development. A final analysis will be performed for the to ensure that the development meets all fire prevention requirements. As a preliminary proactive measure, access to a lower-level Fire Pump House has been included behind the "Bar" Building. If fire pumps are required to reach the appropriate safety standards, a Fire Pump will be installed in this location.

Pump tests for the proposed on-site wells will be performed in accordance with the MassDEP approved BRP WS 13 permit conditions by Coneco with oversight by Onsite Engineering to ensure compliance with state regulations. The results of the pump tests, including quantity and quality results, will be provided to the town as required.

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.

CONECO RESPONSE

A Resource Area Impact plan has been created and provided within the supplemental documents. This plan shows the total amount of impacts to the wetland areas and the 25' and 100' wetland buffers. Additionally, the impacts have been segregated into previous and impervious areas within the buffers.

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.

CONECO RESPONSE

It is acknowledged by the applicant that the location of the dumpsters will cause considerable backing distances for the trash removal drivers. Covered dumpsters are proposed for the project in lieu of trash compactor rooms. Trash will be removed on a regular basis by a licensed waste removal service and disposed of in a legal manner.

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.

CONECO RESPONSE

The Cape Cod Berm near the emergency access on Wilson Street has been replaced with a vertical concrete curb to better separate and protect pedestrians from vehicular traffic as recommended. See Sheet 12 of the Comprehensive Permit Plans.

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.

CONECO RESPONSE

The plans and cross sections have been adjusted accordingly. All discrepancies have been corrected. See Sheets 22, 23, & 24 of the Comprehensive Permit Plans.

12. Proposed inspection ports for the subsurface chamber systems should be a minimum of six-inch diameter.

CONECO RESPONSE

The proposed inspection ports for the underground chamber systems have been modified to a 6" diameter. See Sheet 25 of the Comprehensive Permit Plans.

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.

CONECO RESPONSE

The Cape Cod berm detail has been edited to show the berm being placed monolithically with both pavement courses (see Sheet 29 of the Comprehensive Permit Plans). Additionally, the following note has been added to Sheets 2, 13 & 14 to ensure runoff from impervious areas is directed to the stormwater management systems during the construction period:

"ALL STORMWATER MANAGEMENT SYSTEMS SHALL BE INSTALLED PRIOR TO THE PLACEMENT OF PAVEMENT. IF CURBING IS NOT IMMEDIATELY INSTALLED AT THE

TIME OF PAVING, THE CONTRACTOR SHALL EMBANK THE PERIMETER OF THE PAVEMENT TO ENSURE RUNOFF FROM PAVED AREAS IS DIRECTED TOWARDS THE STORMWATER MANAGEMENT SYSTEMS."

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.

CONECO RESPONSE
Details have been updated to use the recommended reclaimed asphalt (M1.09.0 or M1.10.0) instead of the four inches of 1-1/2" crushed stone. See Sheet 31 of the Comprehensive Permit Plans.

15. The proposed downspout emergency overflow should be a few inches above finished grade to prevent surface water from entering the system.

CONECO RESPONSE
The elevation of the emergency overflow downspout was adjusted to be 3" above finished grade to prevent surface water from entering the system as recommended. See Sheet 29 of the Comprehensive Permit Plans.

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.

CONECO RESPONSE
The bituminous concrete sidewalk detail has been removed from the plans.

17. The drawdown time calculation for Chamber System A should be based on the infiltration rate of 2.41 inches per hour.

CONECO RESPONSE
The drawdown calculation for Infiltration Chamber A was adjusted to use an infiltration rate of 2.41 inches per hour instead of the previous 8.27 in the latest revision of the Stormwater Management Report.

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.

CONECO RESPONSE
Snow storage will primarily be placed onto grassed and landscaped areas off the edge of the associated paved area. An overburden snow storage area has been added to the plans off of the southeastern parking area outside the Zone A and 100' Wetland Buffer Zone. During major snow events, in which snow cannot be stored on site, snow will be trucked off and disposed of in a legal manor. See Sheet 12 of the Comprehensive Permit Plans and the revised Long-term Pollution Prevention Plan within the Stormwater Management Report.

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.

CONECO RESPONSE
The corrected discrepancies in the HydroCAD model have been incorporated into the revised Stormwater Management Report.

Please feel free to contact me at (508) 697-3191 ext. 108 if you have any questions or require additional information.

Best Regards,

Damien J. Dmitruk, P.E.
Principal of Engineering