



July 14, 2023

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

RE: Response to Sewer Commission Letter dated June 6, 2023  
75-79 Pond Street, Rockland, MA

Dear Mr. Rosa and Members of the Board

On behalf of our clients, 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 letter from Charles Heshion, Chairman of the Rockland Board of Sewer Commissioner to the Town of Rockland Zoning Board of Appeals (ZBA), dated June 6, 2023.

As an aid to the reader the complete text of the letter has been summarized into a general comment. This summary is included in *italicized text* and followed by Coneco's responses in plain text.

*Sewer lines within a Zone A*

*Mr. Heshion references the State Environmental Codes related to the prohibition of sewer lines within a Surface Water Supply Protection are Zone A. He specifically references the exemptions in which a sewer line is allowed:*

- (1) Eliminate an existing or potential pollution to the water supply*
- (2) Constructing a public sewer system*

*Mr. Heshion contends that the connection of the Shinglemill Apartments does not classify under either of these exemptions.*

**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.

*.Potential Alteration of Groundwater Flow*

*Mr. Heshion contends that the project will alter the groundwater table by raising its elevation, thus causing potential flooding and placing additional pressure on existing pipes in the area.*

**CONECO RESPONSE**

The control of stormwater, its relation to the groundwater table, and the preventative measures for offsite flooding are resolved by the use of Best Management Practices (BMP's) as required by the Massachusetts DEP Stormwater Management Guidelines. These measures are contained within the site's footprint and should not affect any existing utilities. Please see the Stormwater Management Report that has been developed for this project.

*Rockland Public Sewer Enforcement and Capacity Concerns*

*Mr. Heshion gives context on the EPA's Administrative Order of Violation and Compliance directed to the Rockland Sewer Commission and the moratorium of new connections to the Rockland sewer system.*

**CONECO RESPONSE**

It is acknowledged by the applicant that Rockland sewer system has surpassed its current capacity and is in need of upgrades. The applicant has offered to assist in the funding for the appropriate upgrades to the system, which was negotiated in the approximate amount of \$1,600,000.

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.

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