

**PUBLIC HEALTH**

DIANE DIETZEN, MD, Chair  
JESSICA COLLINS, Vice-Chair  
WALTER R. WOLF, DPM, Clerk



SHARON HART, Director of Public Health

December 5, 2019

As the Health Officer for the Town of South Hadley, I have reviewed the Definitive Plan Submission for North Pole Estates. Review of this development for compliance with Title 5 is more challenging than a typical subdivision. This site is in Zone II of the Dry Brook Public Water Supply wells. Thus, this is a very sensitive area and inadequate protections from developments could adversely impact the public's health and safety.

It is acknowledged that the applicant submitted septic system "design criteria" on the plan, this is not acceptable as a submittal for a Title 5 review. Each individual Title 5 septic plan application will need to be submitted according to 310 Code of Massachusetts Regulations (CMR) 15.000: The State Environmental Code, Title 5: Standard Requirements for the Siting, Construction, Inspection, Upgrade and Expansion of On-Site Sewage Treatment and Disposal Systems and for the Transport and Disposal of Septage.

This development involves substantial removal and alteration of the soils – as much as 50 feet or more. While the submittal provides percolation tests that meet Title 5 requirements these percolation tests were done at current elevation, prior to removal or alteration of soils. A feasibility study (as called for in Section 360-21B(22) of the South Hadley Subdivision Regulations) which takes into consideration the scope of the site work proposed for this development is essential before any determination can be made as to the compliance of septic system designs. I do not consider this a complete Definitive Plan Submission for North Pole Estates. This submission only details four (4) lots and not what is being requested for the entire Definitive Plan for the North Pole Estates. I requested that a Feasibility Report be submitted and reviewed also by an Outside Expert for compliance and adequacy.

Currently, without this report and review, as Health Officer and as authorized by the Board of Health, I disapprove the Definitive Plan Submission for North Pole Estates for the following reasons:

1. The submittal failed to include soils analysis of the elevations at which the septic systems are to be installed. As noted, the Title 5 percolation tests were in soils to be removed or altered as part of the Definitive Plan Submission for North Pole Estates.
2. The submittal failed to include a "feasibility report of the proposed sanitary sewage systems" as required in Section 360-21B(22) of the Subdivision Regulations. Given the location and scale of the proposed development including the extensive earth removal and alteration which is shown, such a report will need to assess the appropriateness and conformity with the soils requirements of 310 CMR 15.000: The State Environmental Code, Title 5, at the gradients at which the septic systems are to be installed.
3. The submittal should include a complete review by an Outside Expert selected by the Planning Board.
4. The submittal only included details on four (4) lots and not the entire Definitive Plan Submission for North Pole Estates.

Sharon D. Hart  
Public Health Director