



BOARD OF HEALTH

TOWN OF MILFORD, MASSACHUSETTS 01757

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November 30, 2017

Milford Zoning Board of Appeals
C/o Office of Town Counsel
Town Hall
52 Main Street
Milford, MA 01757

Dear Chairman Consigli,

The Milford Board of Health is writing you to provide our input regarding the Application for a Comprehensive Permit of E M Street Milford LLC. This application is to authorize the construction of three hundred (300) dwelling units in two buildings on land comprising of approximately 116 acres located at 462-466 East Main Street, Milford, MA.

At a recent meeting of the board of health, held on November 27, 2017, the board members discussed concerns that may have the potential of impacting the residents of Milford.

From a board of health perspective our main concern with this project would be the developer's plan to build a private wastewater treatment facility. This treatment facility is anticipated to treat approximately 25,000 gallons per day. This system will also be capable of treating to a peak rate of 55,000 gallons per day.

Where the State Environmental Code, Title 5 (310 CMR 15.000) governs systems with design flows less than 10,000 gallons per day. Any system that exceeds a discharge volume of 10,000 gpd requires treatment beyond that of an on-site or shared system and must be permitted through the Groundwater Discharge Permit regulations (314 CMR 5.00). Advanced tertiary treatment is necessary with the effluent meeting strict standards for nitrogen suspended solids and biological oxygen demand. The design of this facility is closely reviewed by MassDEP (not local BoH) and ongoing oversight by a certified operator is required.

The local board of health will not issue permits for this wastewater facility. MassDEP will review, comment and approve or disapprove this application and the construction of the facility. It is after this approval that we should be concerned. Concerns such as, but not limited to:

- Who will be responsible to maintain this facility?
- A maintenance plan for this facility will be required indicating 24/7 coverage?

- Who will address potential nuisances and health hazards that could generate from this treatment facility, such as odors, the potential of bio aerosol exposure and other various problems that could be conducive to environmental pollution and other potential health hazards?

Also environmentally the board of health believes the proposed site on East Main Street, does recharge part of the Charles River, thus having a potential impact on the source which is used by the water company for drinking water. Therefore impacts to water resources must be considered in designing this treatment facility.

A board of health meeting with our town engineer Mike Dean, the project's consultant and the Town of Milford's consultant, should be arranged in the near future as this construction date draws closer. This meeting would answer these questions and any question or concern we may have in the future.

Another important factor of this proposed development is the impact the additional 62,000 gallons of water per day that is being projected as needed, would have on Milford's residents and businesses. Milford much like the rest of the State is still experiencing drought conditions and has been experiencing these types of conditions for quite some time. It is the Board of Health's hope that this large amount of additional water usage coupled with the drought conditions and the possibility of future drought seasons, be considered when further review of this project proceeds.

The Board of Health Members are also very concerned that these rental units remain apartments and are not converted to condominiums in the future. The conversion to condominiums would have a major financial impact on Milford's solid waste and recycling budget. The Town of Milford would then be responsible for curbside solid waste/recycling services for this 300 unit complex. Presently Milford is one of only a minimum number of municipalities in the state that still funds waste/recycling service through our tax base. Residents are not burdened with the additional expense of user fees and/or bag fees. A prohibition on condominium conversion for this apartment complex would be most beneficial to our residents and taxpayers.

Your consideration on these issues and concerns is most appreciated and I remain...

Sincerely,

A handwritten signature in dark ink, reading "Kenneth C. Evans". The signature is written in a cursive, flowing style with a large initial "K".

Kenneth C. Evans, Chairman
Milford Board of Health