



MEMORANDUM

DATE: December 7, 2023

TO: Zoning Board of Appeals

FROM: Kevin Duffy, Director of Public Works

CC: Eric Rumsey, Town Planner

RE: 580 Main Street – Comprehensive Permit Application Review

The following documents serve as the basis of my review:

- “Site Plans for Zain Place – 580 Main Street, North Oxford, MA” (12 pages) prepared by Land Design Collaborative, dated July 26, 2023.
- “Proposed Apartments Zain Place – 580 Main Street, North Oxford, Massachusetts” (5 pages) prepared by Dimensions Architecture / Design, dated April 12, 2023.
- “Zain Place Multifamily Housing Project Traffic Impact and Access Study – Oxford, MA” (16 pages) prepared by Fort Hill Infrastructure, dated September 27, 2023.

Based on review of the above documentation I am pleased to offer the Board the following comments:

1. The project proponent asserts in their application that the project will be served by Town water and sewer. As the Board is aware, the municipal water system is not owned, operated, nor maintained by the Town, therefore I cannot comment on the prospects of the development connecting to the water system. However, please note that I, as DPW Director and Sewer Superintendent, have concerns regarding the proposed sewer connection to the municipal sanitary sewer system being requested by the project.

The Town does not operate its own sewage treatment facility, Oxford’s north sewer service area system collects sewage that must be transported through the Town of Auburn to Millbury at the Upper Blackstone Clean Water (UBCW) treatment facility. Specific regulatory constraints are in place according to the Town’s agreements with the Town of Auburn, UBCW facility, and the state’s Water Resources Commission, all of which dictate how much sewage we can transport out of Oxford. Sewage in our north service area generated from water supplied from the French River Basin is collected and transported for ultimate treatment and discharge in the Blackstone River Basin. This constitutes an inter basin transfer, which is regulated under the Inter Basin Transfer Act (ITA), administered by DCR’s Office of Water Resources. The Town of Oxford’s current maximum daily threshold approved under the ITA is 84,000 gallons per day. The Oxford DPW monitors sewage flows in the north service area through a flow metering vendor who maintains the meters and



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provides an online dashboard to review flow data. Historical sewer flow data from the vendor is on file going back several years. Based on our available dataset, average daily flows over the January 1, 2022 to November 30, 2023 show an average of 54,000 gallons per day discharged to the Blackstone River Basin. During wet weather the data shows significant spikes in daily flows due to infiltration and inflow (I/I) into the system where flows approached, and at times exceeded, our maximum threshold under the ITA of 84,000 gallons per day. To date, the Oxford DPW continues to investigate the I/I issue, however more work is left to be done. At the same time, the Town is starting a sizeable sewer extension project along Route 20 as part of MassDOT's larger corridor improvements project that we project will add an additional 26,000 gallons per day into our sewer system at full buildout.

It is my understanding that the applicant proposes approximately 7,500 gallons per day of sewage will be generated by the proposed development based on the proposed sixty-seven-bedroom with development operational/office space in the development. Given the Town's existing daily flows, I/I concerns, and the Town's investment in the Route 20 sewer extension and the projected additional flows from this project, I do not see that it is feasible nor permissible for the applicant's project to connect to the municipal sewer system under the current regulatory constraints.

2. Traffic counts at the study area (Main Street and Depot Road intersection) were completed on August 23, 2023 when Oxford schools were not in session. The study area is located approximately 0.28 miles from Clara Barton Elementary School (along Depot Road) and approximately 1.10 miles from Oxford Middle School and High School Campus (located along Main Street). The study area may be impacted from school day traffic in a manner that is not reflected in the completed traffic study.
3. I strongly recommend the Board require engineering peer review, funded by the applicant, for the following scopes, at minimum: General site/civil engineering review, Traffic study/impacts review, and sanitary sewer review.