

June 27, 2025

**Via email to Alvaro Esparza**

Ashland Zoning Board of Appeals  
Attn: John F, Trefethen, Chair  
101 Main Street  
Second Floor  
Ashland, MA 01721

**Re: “Sanctuary at Ashland Mills – Response to Applicants June 10, 2025 letter**

Dear Chairman,

Haley and Ward, Inc. is writing this letter to present our response to the Applicant's letter dated June 10, 2025, that was a response to our peer review #1 letter dated June 4, 2025.

The applicant's letter addressed two wastewater capacity recommendations that we made in our June 4, 2025 letter. We offer the following responses.

1. *Relative to Haley Ward's suggestion that we install flow meters to measure existing flows up and until Chestnut Street pump station. We respectfully ask if Haley Ward consulted with the Ashland DPW and whether the DPW is in agreement as to the need for this flow data, and whether the DPW is aware of any deficiencies or problems with the current system in the area.*
  - a. *The installation of flow meters and associated monitoring/analysis is a time consuming and costly endeavor; we want to further explore whether this undertaking is even necessary at this juncture before committing to any further activities.*

Our response to item #1 above, is as follows.

Haley Ward did consult with Ashland DPW regarding capacity of the gravity sewers that the Applicant's project will discharge to. Ashland asked Haley Ward if there was available capacity in the town's gravity sewer that would receive the proposed flows. We currently have no information regarding the capacity of the identified gravity sewers. Therefore, Ashland DPW requested Haley Ward to provide a recommendation for determining the available capacity, which is where the recommendation for flow metering was arrived at.



Ashland DPW is aware of grease buildup in some sections of the 18" gravity sewer in Homer Avenue but are not aware of other defects in the identified gravity sewers. They are aware of an issue with the existing sewer manhole in Main Street, that the existing 10-60 Mill property currently discharges to.

The scope of the metering would not be a time-consuming process, as several weeks of metering data can be extrapolated for peak events and provide the required information. We cannot comment on the "costly endeavor" response, as we do not know the constraints the applicant may have on expenditures to obtain approval for this project.

Ashland currently has 2 flow meters in sewers that discharge to the Main Street gravity sewer. Therefore, we envision requiring metering in no more than 2 manholes.

- 2. We would like to also address the second request for us to perform a closed caption television inspection (CCTV) of the existing gravity sewer system. Respectfully we believe this request to be an overreach and highly unusual in the context of this project. The Town has both adequate sewer capacity and a pump station that by all accounts is performing as expected. The CCTV would be for work exclusively outside of the 40B parcel and would be needed for over a mile of sewer main with an exorbitant associated cost. Based on all of the 40B experience of the Applicant, and that of our engineering team from Bohler we have never seen a request of this nature considering the characteristics of the existing system. As such, we are not receptive to performing this work as currently proposed.*

The applicant's response of "Ashland has both adequate sewer capacity and a pump station that by all accounts is performing as expected", is not an accurate statement. Ashland does not know if they have gravity sewer capacity. We did confirm there is capacity under the permit and IMA limits for this project. We do not agree that the station is performing as expected, as we stated in the peer review letter that the Chestnut Street pump station is operating below its expected capacity due to equipment issues, which hopefully will be resolved within the next 2 months.

We have discussed with the Ashland DPW, the condition of the existing gravity sewer that will receive the applicant's proposed flow from their proposed pump station. It was agreed that the current condition is unknown and the only way to confirm that the existing gravity sewer does not contain pipe defects that could reduce its available capacity below the proposed flow, is to conduct CCTV work.



The applicant's response indicates they have never seen a request of this nature. We would not recommend a municipality approve a project, whatever the approval format is without confirmation of current condition and available capacity of a gravity sewer. If a municipality approves a development without confirmation of condition and capacity, and the sewer system cannot handle the additional flows, what is the resolution?

This was our recommendation for confirming the available capacity and condition of the gravity sewer to allow us to provide an opinion on whether the gravity sewer can receive the proposed flows from the Applicant's project. It is the town's decision on who completes the investigation work, the Applicant or others.

Our recommendation is to CCTV approximately 970 linear feet of 12" and 2,230 linear feet of 18" gravity sewer. See attached section of the system map identifying the CCTV scope area. Industry typical pricing for the 3,200 linear feet of CCTV and pipe cleaning is approximately \$55,000.

Sincerely,  
HALEY WARD, Inc.

Gregory J. Eldridge, P.E.  
Vice President – Senior Project Manager

Encl: The Applicants June 10, 2025 response letter.  
CCTV scope area map

Cc: Doug Small, Ashland DPW Director, via email  
Daniel Maurer DPW Deputy Director, via email  
Rebecca Navarro Ashland Administration & Operations Manager, via email  
Becca Solomon Ashland Conservation agent, via email



# STRATEGIC LAND VENTURES

June 10, 2025

John F. Trefethen  
Chair, Ashland Zoning Board of Appeals  
101 Main Street  
Ashland, MA 01721

*Re: "Sanctuary at Ashland Mills" / Applicant Response to Haley Ward June 4<sup>th</sup> Peer Review Letter*

Dear Mr. Chairman:

We are responding to the June 4<sup>th</sup> 2025 peer review letter submitted by Haley Ward. We would like to acknowledge Haley Ward's diligence and thoroughness assessing the proposed development's potential impact on the existing municipal water and sewer infrastructure.

We are hopeful the Board takes comfort with Haley Ward's conclusion that the Town of Ashland's existing water and wastewater infrastructure can comfortably handle the proposed usage estimated for the 40B development. While we believe the estimated daily usage numbers are extremely conservative, even at the peak projections, Haley Ward confirms the Town has adequate capacity.

We would like to address the two recommendations included in Page 6 of the analysis.

1. Relative to Haley Ward's suggestion that we install flow meters to measure existing flows up and until the Chestnut Street pump station. We respectfully ask if Haley Ward consulted with the Ashland DPW and whether the DPW is in agreement as to the need for this flow data, and whether the DPW is aware of any deficiencies or problems with the current system in this area.

The installation of flow meters and associated monitoring/analysis is a time consuming and costly endeavor; we want to further explore whether this undertaking is even necessary at this juncture before committing to any future activities.

2. We would like to also address the second request for us to perform a closed caption television inspection (CCTV) of the existing gravity sewer system. Respectfully, we believe this request to be an overreach and highly unusual in the context of this project. The Town has both adequate sewer capacity and a pump station that by all accounts is performing as expected. The CCTV would be for work exclusively outside of the 40B parcel and would be needed for over a mile of sewer main with an exorbitant associated cost. Based on all of 40B experience of the Applicant, and that of our engineering team from Bohler, we have never seen a request of this nature considering



# STRATEGIC LAND VENTURES

the characteristics of the existing system. As such, we are not receptive to performing this work as currently proposed.

We appreciate the Haley Ward's report and the work they have been performed. We look forward to discussing these considerations at a future public hearing.

Sincerely,

Geoffrey Engler  
Managing Partner of SLV Ashland, LLC

