

Littleton Electric Light and Water Department's Request Under the Interbasin Transfer Act for a Water Supply Connection with Boxborough

WRC Draft Staff Recommendation

August 8, 2024

Facts Pertaining to the Application

The Littleton Electric Light and Water Department's (LELWD's) sources are in the Merrimack River Basin

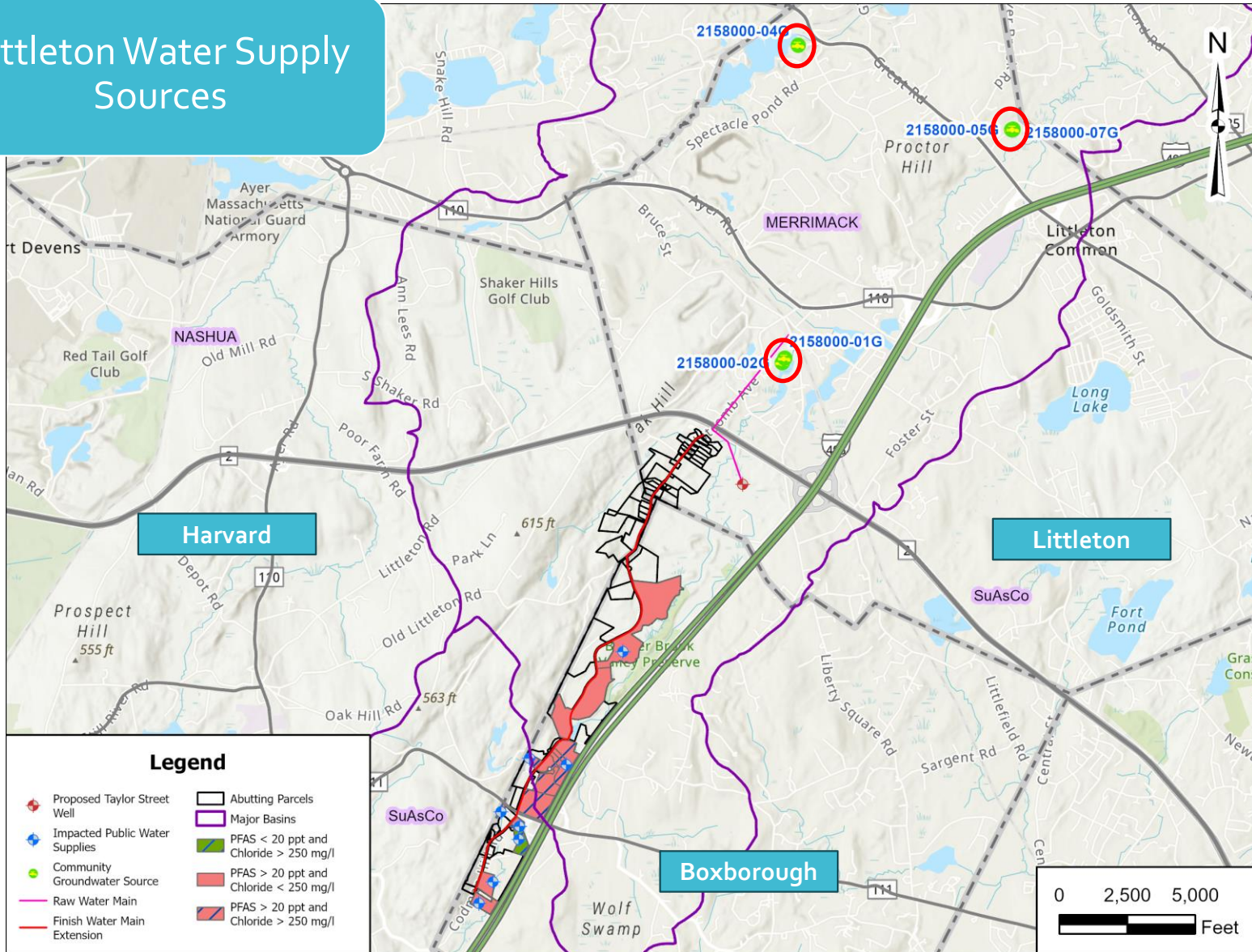
Boxborough has land area in the Merrimack River and Concord River Basins

Boxborough has no municipal water supply

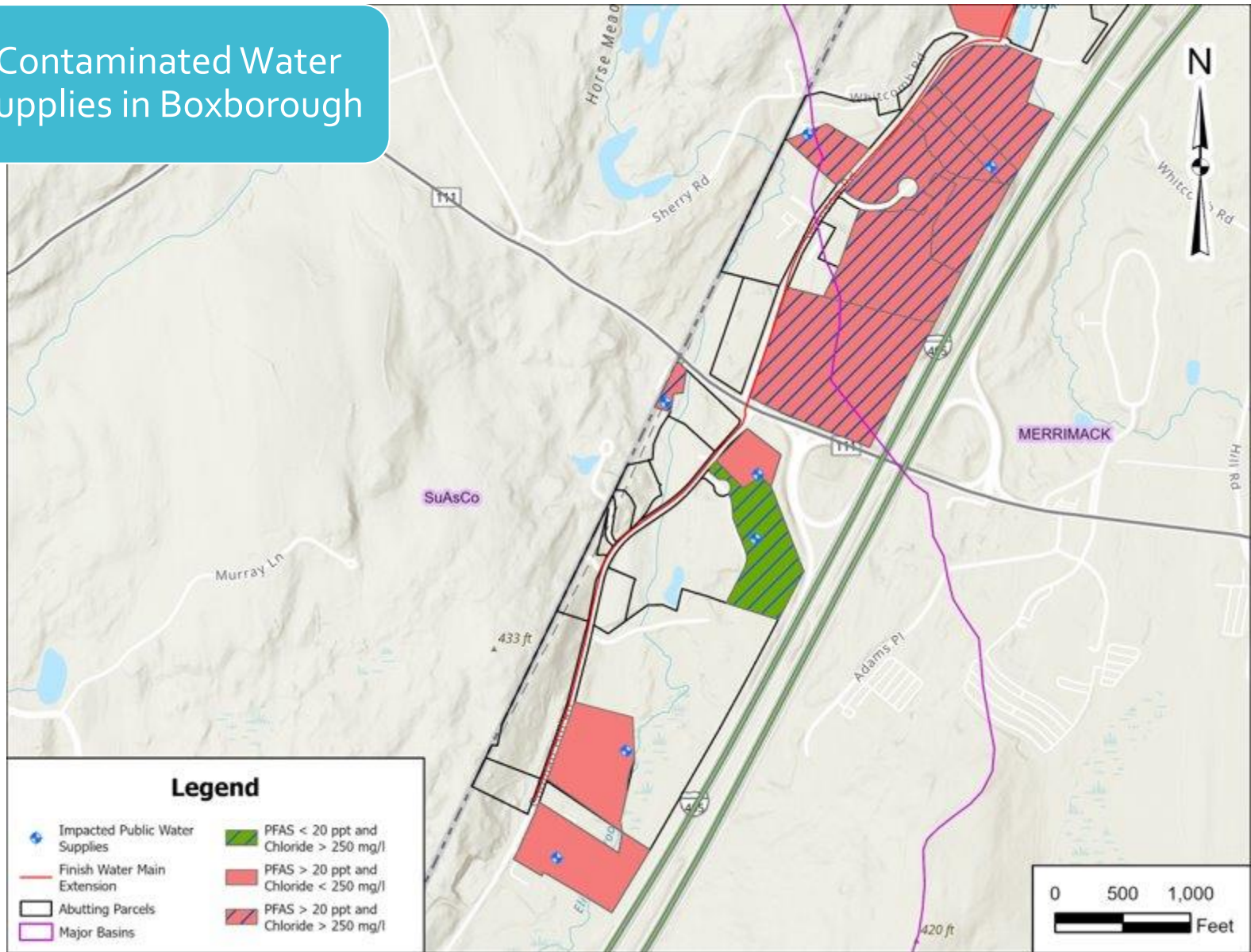
- 11 small public water systems (PWS) in the Town of Boxborough are experiencing contamination of PFAS, sodium, and chloride in existing water supplies
- Contaminated wells serving 1,100 residents living in condominiums (approximately 20% of the town)

Proposing to transfer a maximum of 0.065 MGD to Boxborough (0.060 MGD subject to ITA)

Littleton Water Supply Sources



Contaminated Water Supplies in Boxborough





The Secretary's Certificate on the Single EIR was issued on May 17, 2024, stating that no further MEPA review is needed.



The WRC voted to accept LELWD's application as complete on June 13, 2024.



Public hearings were held via Zoom for the donor and receiving basins on July 24 and July 25, 2024. Written public comments were accepted until August 1, 2024.



Comments received at the public hearings were in favor of the project. Written public comments were also supportive of the project.

More Facts

Criteria of the Act

Criteria	Application Meets?
Criterion #1: MEPA Compliance	Yes
Criterion #2: Viable In-Basin Sources	Yes
Criterion #3: Water Conservation	Yes, with conditions
Criterion #4: Forestry Management	Not Applicable
Criterion #5: Reasonable Instream Flow	Yes
Criterion #6: Groundwater/Pumping Test	Yes, with conditions
Criterion #7: Cumulative Impacts	Yes

Criterion 2: Viable In- Basin Sources



Groundwater contamination challenges



Treatment challenges



Alternatives: no action, add treatment for each PWS, drill individual replacement wells, municipal interconnection



Recommended alternative: new interconnection with LELWD

Criterion 3: Water Conservation

Meets most of the Performance Standards for Water Conservation including:

- Metering, leak detection, rgpcd, water rates, billing, public education/outreach

Conditions to fully meet Performance Standards for a few other items:

- UAW, drought plan updates, ICI outreach

LELWD completed a written water conservation plan and water loss control plan in 2024.

Over the last 5 years (2019-2023), rgpcd averaged 52 and UAW averaged 13%.

Criterion 5:
Reasonable
Instream
Flow
&
Criterion 7:
Cumulative
Impacts

Criterion 5 evaluates whether reasonable instream flow in the river from which the water is transferred is maintained

Criterion 7 evaluates cumulative impacts of all past, authorized or proposed transfers on streamflows, groundwater, lakes, ponds, reservoirs or other impoundments in the donor basin and relevant sub-basins

Criterion 5: Reasonable Instream Flow & Criterion 7: Cumulative Impacts



Reviewed the 0.060 MGD proposed transfer as well as the cumulative transfer of 0.075 MGD (incl. Woodlands at Laurel Hill)



Synthesized flow data for the cumulative transfer showed a median flow reduction of 0.45% from 1964-2023



The cumulative transfer meets the Insignificance criterion for streamflow (transfer is less than 5% of the unimpacted 95% exceedance flow)



Concerns about potential impacts to state-listed species addressed under Criterion 6

Criterion 6: Impacts of Groundwater Withdrawals



Proposed Taylor Street Well is located in an area mapped as habitat for state-listed Blanding's Turtle



Determination issued on June 7, 2024 by MassWildlife that the project will result in a Take



MassWildlife anticipates that LELWD will qualify for and meet the performance standards of a Conservation and Management Permit (CMP)



CMP expected to authorize use of the well at 0.265 MGD, 50% of the requested volume



LELWD must commit in writing to abide by any required conditions. Conditions cover:



Continue implementation of 2024 Water Loss Control Plan and annual audits to reduce UAW



Revisions to drought management plan



Continue efforts to remain below 65 rgpcd

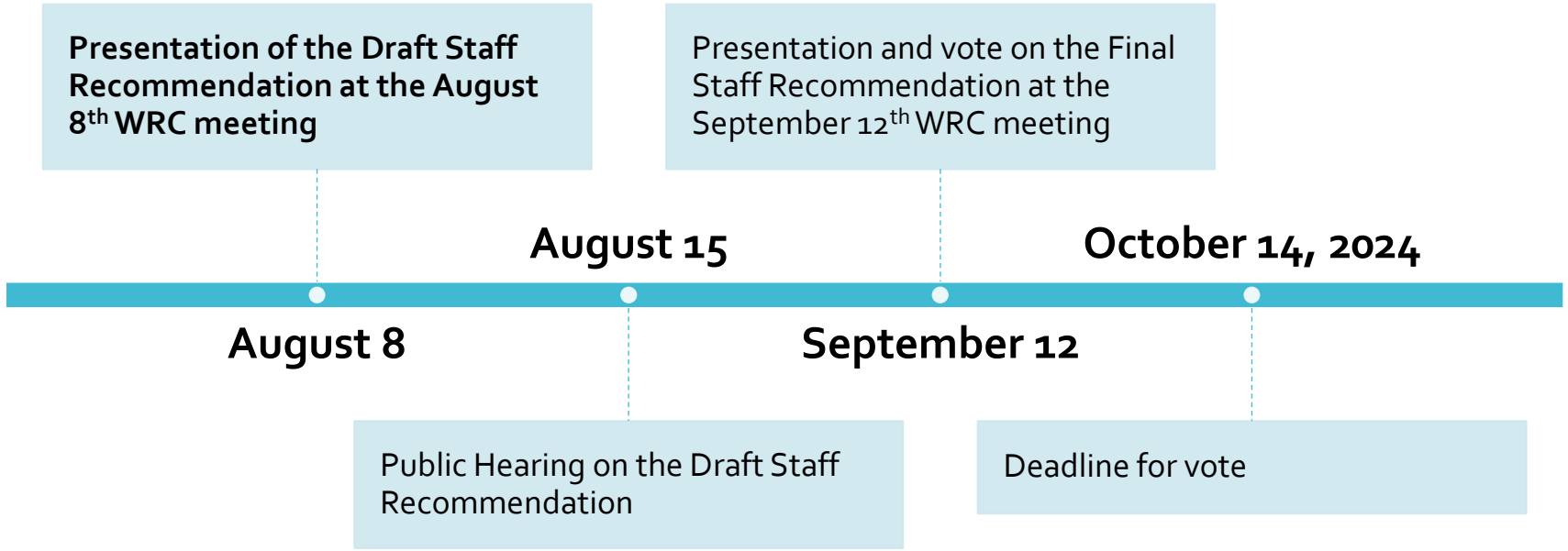


Reach out annually to top ICI users including those in Boxborough to encourage conservation



Complete development of and implement a CMP for Taylor Street Well

Conditions of the Approval



Next Steps