

**Town of Groton  
Request for Determination of Insignificance  
Under the Interbasin Transfer Act**

**Staff Recommendation**

Massachusetts Water Resources Commission  
August 8, 2024

# Existing Conditions

- 1980s: wastewater connection from Groton Center District to Pepperell WWTP – pre-dates ITA
- 2012: wastewater connection from Lost Lake/Four Corners to Ayer WWTP in Nashua River Basin
  - WRC found this project Insignificant on October 11, 2012
  - Only Four Corners portion constructed
  - Amendment request currently under consideration

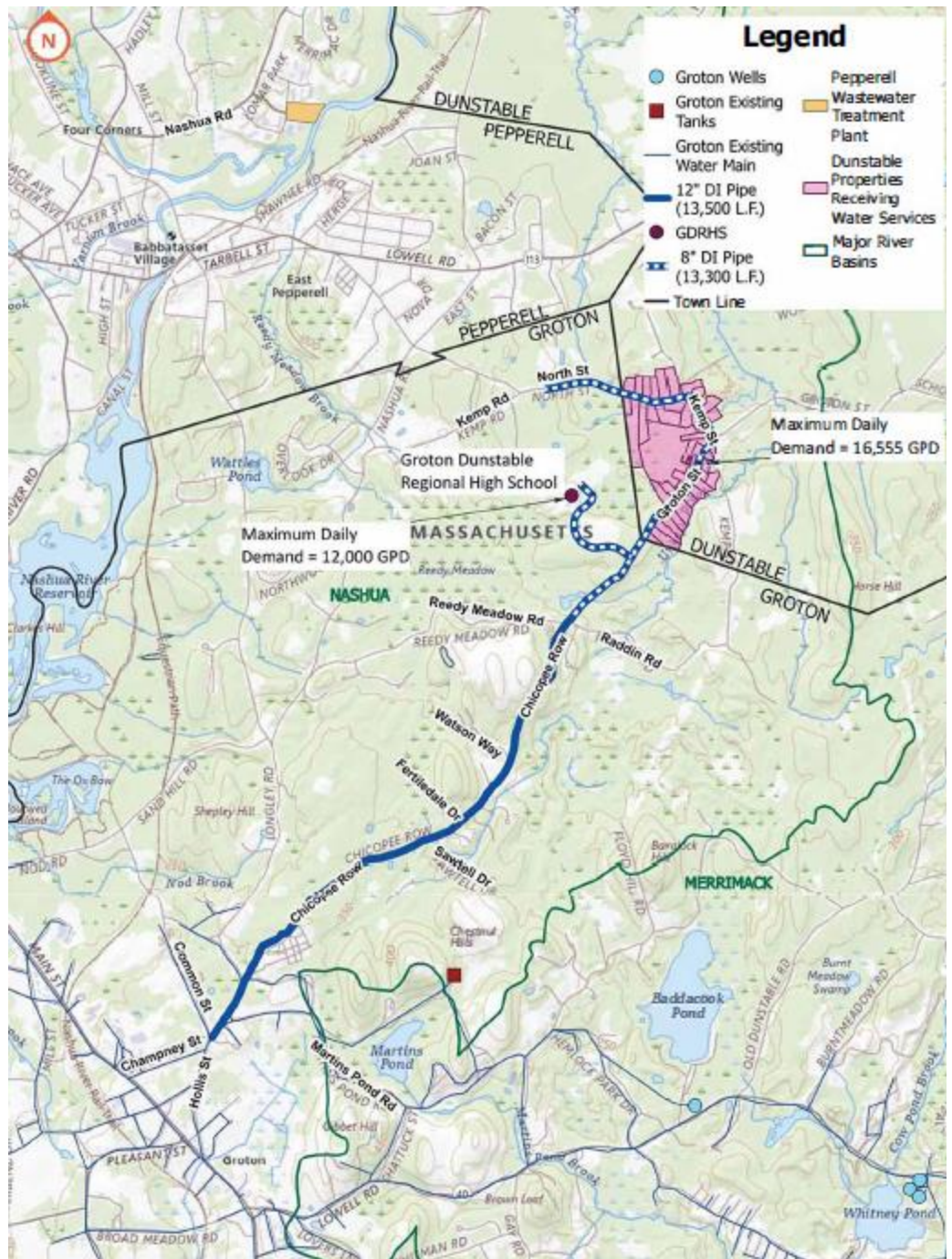
# Existing Conditions

- Private wells for the Groton Dunstable Regional High School (GDRHS), as well as properties in Groton and Dunstable, are affected by PFAS contamination due to a past fire on school property
- GDRHS discharges wastewater to the Pepperell WWTP in the Nashua River Basin
- Properties in Dunstable discharge wastewater to the Nashua River Basin

# Description of Proposed Transfer

- Water sourced from Merrimack River Basin in Groton
- Water will be used for the GDRHS in Groton and properties in Groton and Dunstable, all of which are in the Nashua River Basin
- Total estimated demand is 60,495 gpd, 28,555 gpd of which is subject to ITA review
  - Irrigation at GDRHS and septic discharge from properties in Groton will not cross a municipal boundary

# Map of Existing and Proposed Conditions



# Proposed Transfer Volumes

<b>Location</b>	<b>Maximum flow (gallons per day)</b>
GDRHS Domestic Flow	12,000
Dunstable Residents	16,555
	<b>TOTAL: 28,555</b>

# Cumulative Interbasin Transfer Volumes

<b>Location</b>	<b>Maximum flow (gallons per day)</b>
Four Corners (transfer approved in 2012 Decision)	40,495
GDRHS and Dunstable Proposed Transfer	28,555
	<b>TOTAL: 69,050</b>

The previously mentioned Amendment would allow Groton to relinquish 322,505 gpd of interbasin transfer, freeing up additional volume that can be considered as Insignificant.

# Streamflow Analysis

- Proposed volume, including any previously approved transfers, must be less than 5% of the unimpacted 95% exceedance flow as estimated at an appropriate point in the donor basin

5% of Unimpacted 95% Exceedance flow	73,000 gpd
Proposed Cumulative Interbasin Transfer Volume	69,050 gpd
IBT Request Below Threshold?	Yes



# Past Vs. Current Insignificant Volume

- 2012: 363,000 gpd
- 2024: 73,000 gpd
- Past Decision
  - Different analysis point in basin
  - ITA regulation revision in 2018
  - Lost Lake volume contingent on dam release plan to be implemented *after* construction of wastewater collection system

# ITA Insignificance Criteria: 313 CMR 4.08(3)

<u>Criterion</u>	<u>Proposal Meets?</u>	<u>Explanation</u>
(a) Is less than 1 MGD	Meets	Proposed interbasin transfer is 28,555 gpd.
(b) Is temporary, of short duration and for a purpose other than water supply or wastewater service	Not Applicable	Proposal is long-term for water supply purposes.
(c) Cumulative, approved transfers, including the proposed amount, are less than 5% of the unimpacted 95% Exceedance Flow	Meets	The cumulative transfer volume is less than 5% of the unimpacted Exceedance Flow.
(d) Cumulative, approved annual amount of the transfers, including the proposed amount, are less than 1% of the average annual precipitation on the drainage area of the water body, and less than 5% of the drought year inflow to the water body	Not Applicable	The transfer is primarily derived from streamflow.

# ITA Insignificance Criteria: 313 CMR 4.08(3)

<u>Criterion</u>	<u>Proposal Meets?</u>	<u>Explanation</u>
(e) The 7Q10 flow, when relied upon in a program of pollution abatement, will not be significantly diminished or prolonged	Meets	Changes to downstream flow are expected to be negligible from the current condition as a result of the transfer.
(f) Special resource values will not be adversely affected	Meets	Special resources values in the area are not anticipated to be affected by this transfer.
(g) Measures to protect instream flows have been taken where appropriate and achievable, and any such measures are proposed as part of the applications	Meets	Changes to downstream flow are expected to be minimal as a result of the transfer. The Groton Water Department proposes to continue its water conservation measures to minimize demand.
(h) The Commission shall consider the cumulative impacts of all past, authorized or proposed transfers on streamflows in the donor basin	Meets	The previously approved wastewater transfer for the Four Corners area of Groton has been considered and included in the analyses for this proposed transfer.

# Staff Recommendation

- Application meets all applicable criteria for Insignificance
- Staff recommends that the WRC find this project to be Insignificant under the ITA.

# Next Steps

- The WRC must make a decision on this request by September 17, 2024.
- A vote on the proposal will be requested at the next regularly scheduled WRC meeting on September 12, 2024.