

Town of Groton's Request for an Amendment to its 2012 Determination of Insignificance Under the Interbasin Transfer Act

Staff Recommendation for WRC Vote

Massachusetts Water Resources Commission
September 12, 2024

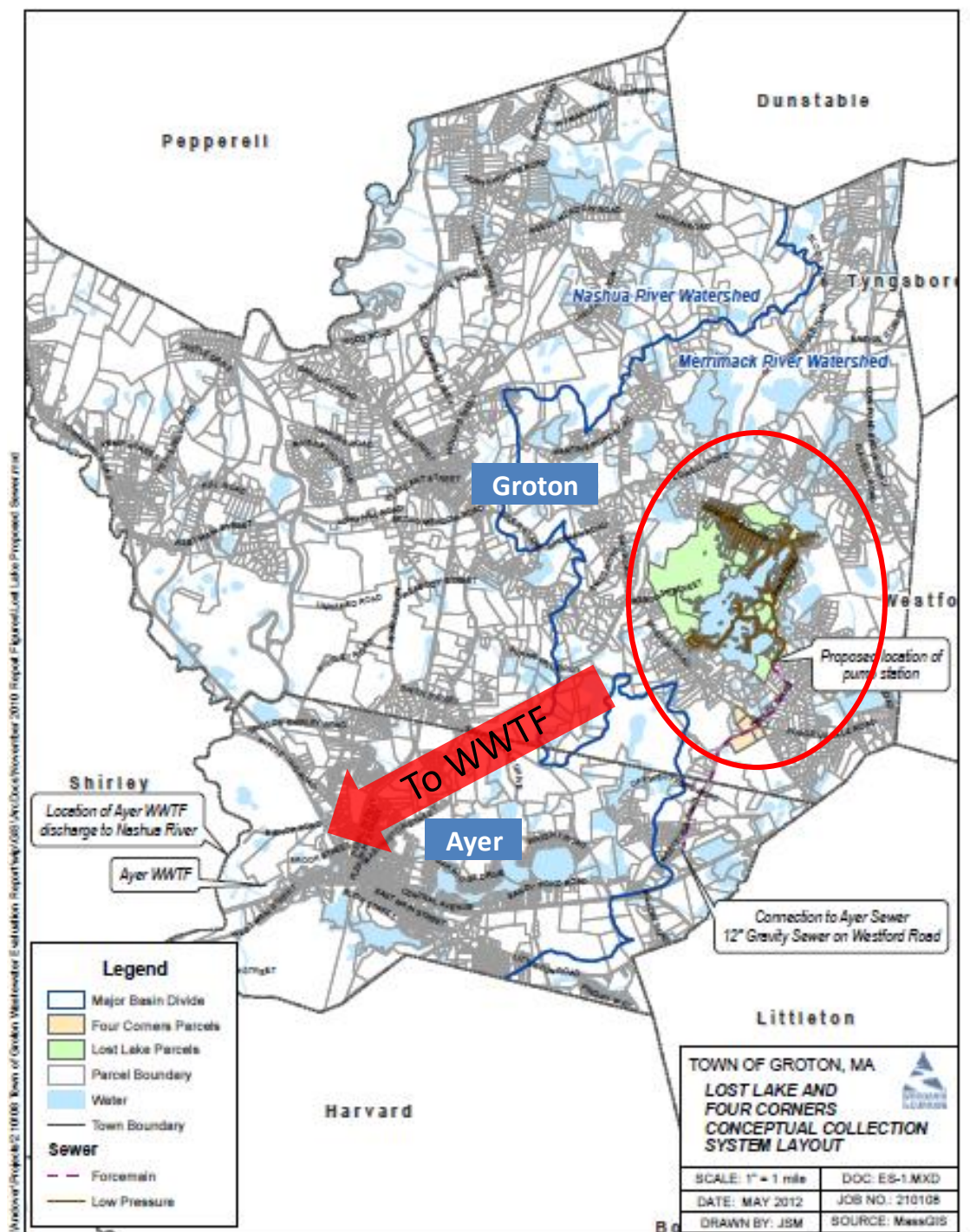
Town of Groton, MA

- Has land area in the Merrimack River and Nashua River Basins
- Lost Lake and Four Corners areas of town are in the Merrimack River Basin portion of Groton
 - Areas were plagued by septic system failures, leading to lake eutrophication and potential impacts to private residential water supply wells
- Both areas supplied with water from the Merrimack River Basin, whether from on-site wells or from the Groton Water Department

Description of 2012 Approved Transfer

- Sewering was proposed to serve the Lost Lake and Four Corners areas in Merrimack River Basin
- The wastewater collection system was proposed to discharge to the Ayer Wastewater Treatment Plant, which is in the Nashua River Basin
- Maximum day sewer needs = 363,000 gpd
- The WRC determined that this proposal met the criteria for Insignificance on October 11, 2012

Conditions Approved in 2012 Decision



Transfer Volume Approved in 2012 Decision

Location	Maximum flow (gallons per day)
Lost Lake Residential Properties	322,505
Four Corners Mixed-Use Area	40,495
	TOTAL: 363,000

Description of Current Amendment Request

- March 18, 2024: Town of Groton requested to relinquish a portion of the volume approved in the 2012 Lost Lake and Four Corners Decision
- Town has abandoned plans to construct the Lost Lake sewer, but Four Corners wastewater collection system was constructed
- Requesting an amendment to nullify Lost Lake portion of previously allocated IBT
 - Amendment would relinquish 322,505 gpd (Lost Lake) and retain 40,495 gpd (Four Corners)

Lost Lake Dam Management Plan

- The 2012 Decision stated: “Following sewer system construction and connection, Groton will monitor streamflow downstream of the Lost Lake Dam and manage releases according to the plan.”
- Because the Lost Lake sewer system was never constructed, the dam management plan is no longer required to be implemented.

Staff Recommendation

- Staff recommends that the WRC approve Groton's request to relinquish the Lost Lake portion of its previously approved interbasin transfer volume.
- This will reduce the approved interbasin transfer volume from the Merrimack River Basin to the Nashua River Basin to a total of 40,495 gpd.
- A vote on the amendment is requested today.

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

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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 to reduce volume

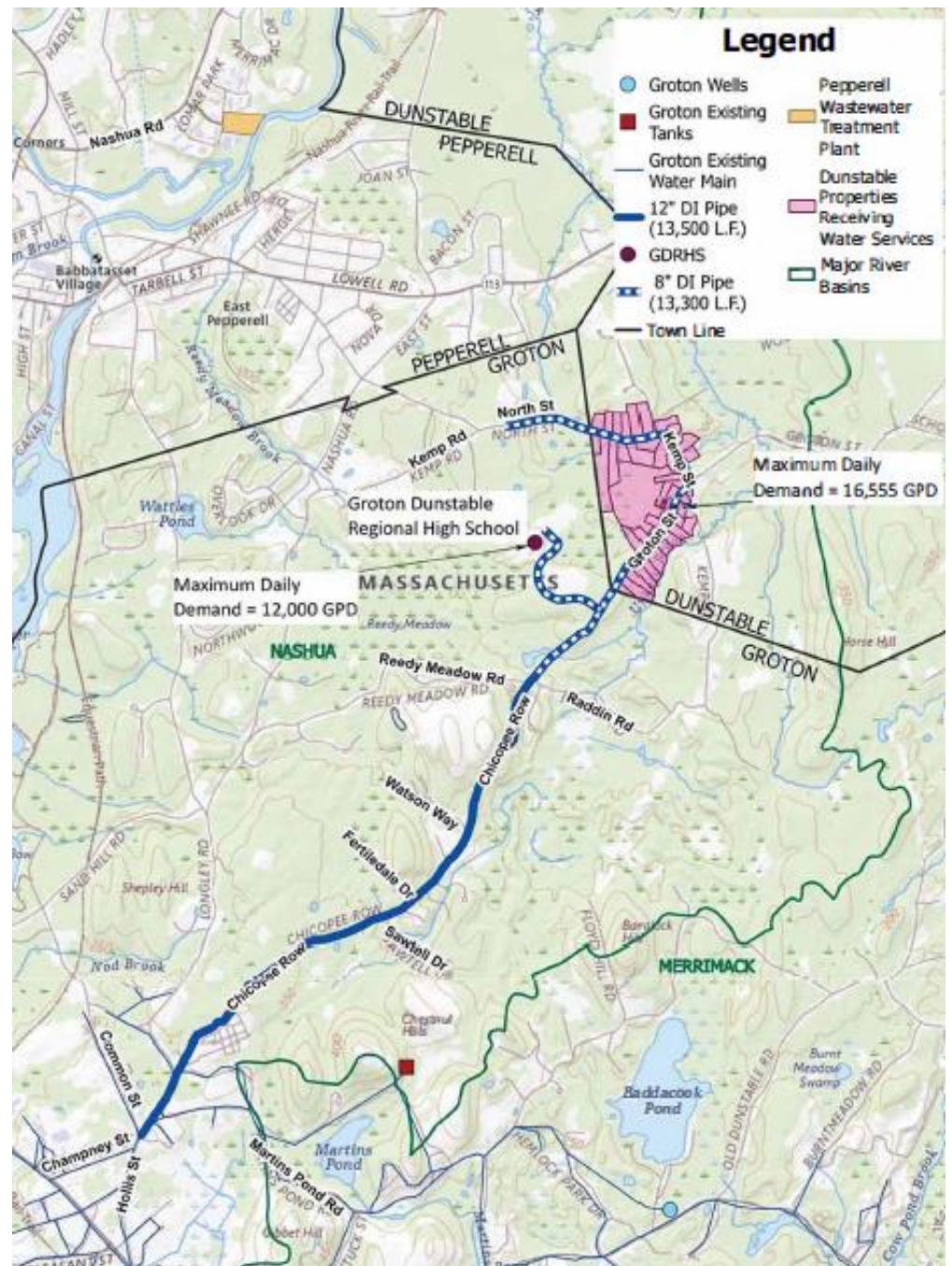
Existing Conditions

- 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

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

Cumulative Interbasin Transfer Volumes

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

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 (no longer required)

Staff Recommendation

- Application meets all applicable criteria for Insignificance
- Staff recommends that the WRC find this project to be Insignificant under the ITA.
- The WRC must make a decision on this request by September 17, 2024.
- A vote on the proposal is requested today.