



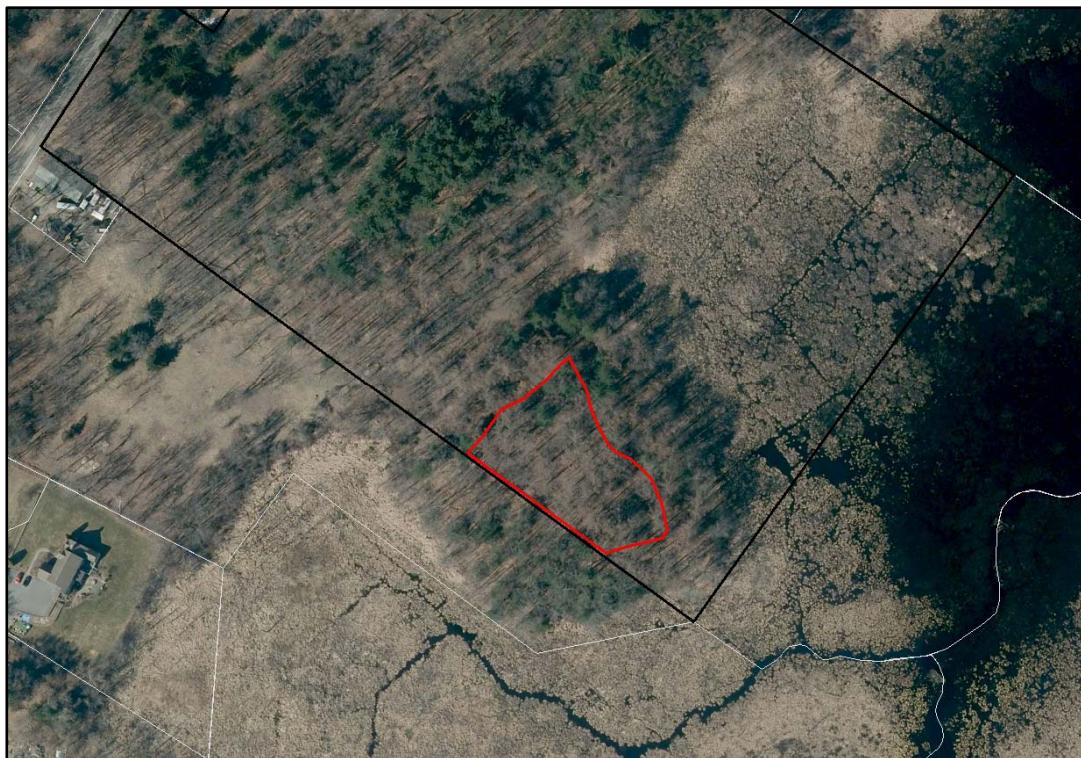
Wetlands Delineation & Permitting Wildlife Studies Herpetology Vernal Pool Ecology Botany Aerial Imagery

Notice of Intent

**Pursuant to the Massachusetts Wetlands Protection Act M.G.L. c. 131, §40
and the Town of Littleton Wetland Protection Bylaw (Chapter 171)**

Habitat Enhancement Project

**0 Whitcomb Avenue
(Map-Parcel: R13-5-0)**



2023 MassGIS Orthophotograph of Proposed Habitat Enhancement Area

Submitted by:
Littleton Electric Light & Water Department
39 Ayer Road
Littleton, MA 01460

Prepared by:
Oxbow Associates, Inc.
P.O. Box 971
Acton, MA 01720-0971
978-929-9058
www.oxbowassociates.com

December 15, 2025



Wetlands Delineation & Permitting Wildlife Studies Herpetology Vernal Pool Ecology Botany Aerial Imagery

Notice of Intent

Pursuant to the Massachusetts Wetlands Protection Act M.G.L. c. 131, § 40 and the Town of Littleton Wetlands Protection Bylaw

**0 Whitcomb Avenue
Littleton, MA 01460
Parcel R13-5-0**

Applicant:

Littleton Electric Light & Water Department
39 Ayer Road
Littleton, MA 01460

Owner:

Sudbury Valley Trustees, Inc.
18 Wolbach Road
Sudbury, MA 01776

Contents:

- WPA Form 3 – Notice of Intent
- NHESP Conservation and Management Permit
- Project Narrative
- Representative Site Photographs
- USGS Site Locus Map
- NRCS Web Soil Survey Map
- FEMA Flood Insurance Firmette Map
- Certified List of Abutters
- Notification to Abutters
- Affidavit of Service Form

Site Plan: Proposed Wildlife Habitat Enhancement
Sudbury Valley Trustees
November 20, 2025

Prepared by: Oxbow Associates, Inc.
P.O. Box 971
Acton, MA 01720



Massachusetts Department of Environmental Protection

Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

MassDEP File Number

Document Transaction Number

City/Town

A. General Information (continued)

6. General Project Description:

7a. Project Type Checklist: (Limited Project Types see Section A. 7b.)

1. <input type="checkbox"/> Single Family Home	2. <input type="checkbox"/> Residential Subdivision
3. <input type="checkbox"/> Commercial/Industrial	4. <input type="checkbox"/> Dock/Pier
5. <input type="checkbox"/> Utilities	6. <input type="checkbox"/> Coastal engineering Structure
7. <input type="checkbox"/> Agriculture (e.g., cranberries, forestry)	8. <input type="checkbox"/> Transportation
9. <input type="checkbox"/> Other	

7b. Is any portion of the proposed activity eligible to be treated as a limited project (including Ecological Restoration Limited Project) subject to 310 CMR 10.24 (coastal) or 310 CMR 10.53 (inland)?

1. Yes No If yes, describe which limited project applies to this project. (See 310 CMR 10.24 and 10.53 for a complete list and description of limited project types)

2. Limited Project Type

If the proposed activity is eligible to be treated as an Ecological Restoration Limited Project (310 CMR 10.24(8), 310 CMR 10.53(4)), complete and attach Appendix A: Ecological Restoration Limited Project Checklist and Signed Certification.

8. Property recorded at the Registry of Deeds for:

a. County

b. Certificate # (if registered land)

c. Book

d. Page Number

B. Buffer Zone & Resource Area Impacts (temporary & permanent)

- Buffer Zone Only – Check if the project is located only in the Buffer Zone of a Bordering Vegetated Wetland, Inland Bank, or Coastal Resource Area.
- Inland Resource Areas (see 310 CMR 10.54-10.58; if not applicable, go to Section B.3, Coastal Resource Areas).

Check all that apply below. Attach narrative and any supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.



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B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

For all projects affecting other Resource Areas, please attach a narrative explaining how the resource area was delineated.

<u>Resource Area</u>	<u>Size of Proposed Alteration</u>	<u>Proposed Replacement (if any)</u>
a. <input type="checkbox"/> Bank	1. linear feet	2. linear feet
b. <input type="checkbox"/> Bordering Vegetated Wetland	1. square feet	2. square feet
c. <input type="checkbox"/> Land Under Waterbodies and Waterways	1. square feet 3. cubic yards dredged	2. square feet
 <u>Resource Area</u>	 <u>Size of Proposed Alteration</u>	 <u>Proposed Replacement (if any)</u>
d. <input type="checkbox"/> Bordering Land Subject to Flooding	1. square feet	2. square feet
e. <input type="checkbox"/> Isolated Land Subject to Flooding	3. cubic feet of flood storage lost 1. square feet	4. cubic feet replaced 2. cubic feet of flood storage lost
f. <input type="checkbox"/> Riverfront Area	1. Name of Waterway (if available) - specify coastal or inland	3. cubic feet replaced
2. Width of Riverfront Area (check one):		
<input type="checkbox"/> 25 ft. - Designated Densely Developed Areas only		
<input type="checkbox"/> 100 ft. - New agricultural projects only		
<input type="checkbox"/> 200 ft. - All other projects		
3. Total area of Riverfront Area on the site of the proposed project:	square feet	
4. Proposed alteration of the Riverfront Area:		
a. total square feet	b. square feet within 100 ft.	c. square feet between 100 ft. and 200 ft.
5. Has an alternatives analysis been done and is it attached to this NOI?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6. Was the lot where the activity is proposed created prior to August 1, 1996?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. <input type="checkbox"/> Coastal Resource Areas: (See 310 CMR 10.25-10.35)		

Note: for coastal riverfront areas, please complete **Section B.2.f.** above.



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B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

Check all that apply below. Attach narrative and supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

Online Users:
Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

<u>Resource Area</u>	<u>Size of Proposed Alteration</u>	<u>Proposed Replacement (if any)</u>
a. <input type="checkbox"/> Designated Port Areas	Indicate size under Land Under the Ocean, below	
b. <input type="checkbox"/> Land Under the Ocean	1. square feet	2. cubic yards dredged
c. <input type="checkbox"/> Barrier Beach	Indicate size under Coastal Beaches and/or Coastal Dunes below	
d. <input type="checkbox"/> Coastal Beaches	1. square feet	2. cubic yards beach nourishment
e. <input type="checkbox"/> Coastal Dunes	1. square feet	2. cubic yards dune nourishment
<u>Size of Proposed Alteration</u>		
f. <input type="checkbox"/> Coastal Banks	1. linear feet	
g. <input type="checkbox"/> Rocky Intertidal Shores	1. square feet	
h. <input type="checkbox"/> Salt Marshes	1. square feet	2. sq ft restoration, rehab., creation
i. <input type="checkbox"/> Land Under Salt Ponds	1. square feet	
j. <input type="checkbox"/> Land Containing Shellfish	2. cubic yards dredged	
k. <input type="checkbox"/> Fish Runs	1. square feet	
Indicate size under Coastal Banks, inland Bank, Land Under the Ocean, and/or inland Land Under Waterbodies and Waterways, above		
	1. cubic yards dredged	
l. <input type="checkbox"/> Land Subject to Coastal Storm Flowage	1. square feet	
4. <input type="checkbox"/> Restoration/Enhancement	If the project is for the purpose of restoring or enhancing a wetland resource area in addition to the square footage that has been entered in Section B.2.b or B.3.h above, please enter the additional amount here.	
a. square feet of BVW	b. square feet of Salt Marsh	
5. <input type="checkbox"/> Project Involves Stream Crossings		
a. number of new stream crossings	b. number of replacement stream crossings	



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C. Other Applicable Standards and Requirements

This is a proposal for an Ecological Restoration Limited Project. Skip Section C and complete Appendix A: Ecological Restoration Limited Project Checklists – Required Actions (310 CMR 10.11).

Streamlined Massachusetts Endangered Species Act/Wetlands Protection Act Review

1. Is any portion of the proposed project located in **Estimated Habitat of Rare Wildlife** as indicated on the most recent Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the Natural Heritage and Endangered Species Program (NHESP)? To view habitat maps, see the *Massachusetts Natural Heritage Atlas* or go to http://maps.massgis.state.ma.us/PRI_EST_HAB/viewer.htm.

a. Yes No

If yes, include proof of mailing or hand delivery of NOI to:

Natural Heritage and Endangered Species Program
Division of Fisheries and Wildlife
1 Rabbit Hill Road
Westborough, MA 01581

b. Date of map

If yes, the project is also subject to Massachusetts Endangered Species Act (MESA) review (321 CMR 10.18). To qualify for a streamlined, 30-day, MESA/Wetlands Protection Act review, please complete Section C.1.c, and include requested materials with this Notice of Intent (NOI); OR complete Section C.2.f, if applicable. *If MESA supplemental information is not included with the NOI, by completing Section 1 of this form, the NHESP will require a separate MESA filing which may take up to 90 days to review (unless noted exceptions in Section 2 apply, see below).*

c. Submit Supplemental Information for Endangered Species Review*

1. Percentage/acreage of property to be altered:

(a) within wetland Resource Area _____ percentage/acreage

(b) outside Resource Area _____ percentage/acreage

2. Assessor's Map or right-of-way plan of site

2. Project plans for entire project site, including wetland resource areas and areas outside of wetlands jurisdiction, showing existing and proposed conditions, existing and proposed tree/vegetation clearing line, and clearly demarcated limits of work **

(a) Project description (including description of impacts outside of wetland resource area & buffer zone)

(b) Photographs representative of the site

* Some projects **not** in Estimated Habitat may be located in Priority Habitat, and require NHESP review (see <https://www.mass.gov/massachusetts-endangered-species-act-mesa-regulatory-review>).

Priority Habitat includes habitat for state-listed plants and strictly upland species not protected by the Wetlands Protection Act.

** MESA projects may not be segmented (321 CMR 10.16). The applicant must disclose full development plans even if such plans are not required as part of the Notice of Intent process.



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Provided by MassDEP:

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C. Other Applicable Standards and Requirements (cont'd)

(c) MESA filing fee (fee information available at <https://www.mass.gov/how-to/how-to-file-for-a-mesa-project-review>).

Make check payable to "Commonwealth of Massachusetts - NHESP" and **mail to NHESP** at above address

Projects altering 10 or more acres of land, also submit:

(d) Vegetation cover type map of site

(e) Project plans showing Priority & Estimated Habitat boundaries

(f) OR Check One of the Following

1. Project is exempt from MESA review.

Attach applicant letter indicating which MESA exemption applies. (See 321 CMR 10.14, <https://www.mass.gov/service-details/exemptions-from-review-for-projectsactivities-in-priority-habitat>; the NOI must still be sent to NHESP if the project is within estimated habitat pursuant to 310 CMR 10.37 and 10.59.)

2. Separate MESA review ongoing.

a. NHESP Tracking #

b. Date submitted to NHESP

3. Separate MESA review completed.

Include copy of NHESP "no Take" determination or valid Conservation & Management Permit with approved plan.

3. For coastal projects only, is any portion of the proposed project located below the mean high water line or in a fish run?

a. Not applicable – project is in inland resource area only b. Yes No

If yes, include proof of mailing, hand delivery, or electronic delivery of NOI to either:

South Shore - Bourne to Rhode Island border, and
the Cape & Islands:

North Shore - Plymouth to New Hampshire border:

Division of Marine Fisheries -
Southeast Marine Fisheries Station
Attn: Environmental Reviewer
836 South Rodney French Blvd.
New Bedford, MA 02744
Email: dmf.envreview-south@mass.gov

Division of Marine Fisheries -
North Shore Office
Attn: Environmental Reviewer
30 Emerson Avenue
Gloucester, MA 01930
Email: dmf.envreview-north@mass.gov

Also if yes, the project may require a Chapter 91 license. For coastal towns in the Northeast Region, please contact MassDEP's Boston Office. For coastal towns in the Southeast Region, please contact MassDEP's Southeast Regional Office.

c. Is this an aquaculture project? d. Yes No

If yes, include a copy of the Division of Marine Fisheries Certification Letter (M.G.L. c. 130, § 57).



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C. Other Applicable Standards and Requirements (cont'd)

4. Is any portion of the proposed project within an Area of Critical Environmental Concern (ACEC)?

a. Yes No If yes, provide name of ACEC (see instructions to WPA Form 3 or MassDEP Website for ACEC locations). **Note:** electronic filers click on Website.

b. ACEC

5. Is any portion of the proposed project within an area designated as an Outstanding Resource Water (ORW) as designated in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00?

a. Yes No

6. Is any portion of the site subject to a Wetlands Restriction Order under the Inland Wetlands Restriction Act (M.G.L. c. 131, § 40A) or the Coastal Wetlands Restriction Act (M.G.L. c. 130, § 105)?

a. Yes No

7. Is this project subject to provisions of the MassDEP Stormwater Management Standards?

a. Yes. Attach a copy of the Stormwater Report as required by the Stormwater Management Standards per 310 CMR 10.05(6)(k)-(q) and check if:

1. Applying for Low Impact Development (LID) site design credits (as described in Stormwater Management Handbook Vol. 2, Chapter 3)
2. A portion of the site constitutes redevelopment
3. Proprietary BMPs are included in the Stormwater Management System.

b. No. Check why the project is exempt:

1. Single-family house
2. Emergency road repair
3. Small Residential Subdivision (less than or equal to 4 single-family houses or less than or equal to 4 units in multi-family housing project) with no discharge to Critical Areas.

D. Additional Information

This is a proposal for an Ecological Restoration Limited Project. Skip Section D and complete Appendix A: Ecological Restoration Notice of Intent – Minimum Required Documents (310 CMR 10.12).

Applicants must include the following with this Notice of Intent (NOI). See instructions for details.

Online Users: Attach the document transaction number (provided on your receipt page) for any of the following information you submit to the Department.

1. USGS or other map of the area (along with a narrative description, if necessary) containing sufficient information for the Conservation Commission and the Department to locate the site. (Electronic filers may omit this item.)
2. Plans identifying the location of proposed activities (including activities proposed to serve as a Bordering Vegetated Wetland [BVW] replication area or other mitigating measure) relative to the boundaries of each affected resource area.



Massachusetts Department of Environmental Protection

Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

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City/Town

D. Additional Information (cont'd)

3. Identify the method for BVW and other resource area boundary delineations (MassDEP BVW Field Data Form(s), Determination of Applicability, Order of Resource Area Delineation, etc.), and attach documentation of the methodology.
4. List the titles and dates for all plans and other materials submitted with this NOI.

a. Plan Title

b. Prepared By

c. Signed and Stamped by

d. Final Revision Date

e. Scale

f. Additional Plan or Document Title

g. Date

5. If there is more than one property owner, please attach a list of these property owners not listed on this form.
6. Attach proof of mailing for Natural Heritage and Endangered Species Program, if needed.
7. Attach proof of mailing for Massachusetts Division of Marine Fisheries, if needed.
8. Attach NOI Wetland Fee Transmittal Form
9. Attach Stormwater Report, if needed.

E. Fees

1. Fee Exempt: No filing fee shall be assessed for projects of any city, town, county, or district of the Commonwealth, federally recognized Indian tribe housing authority, municipal housing authority, or the Massachusetts Bay Transportation Authority.

Applicants must submit the following information (in addition to pages 1 and 2 of the NOI Wetland Fee Transmittal Form) to confirm fee payment:

2. Municipal Check Number

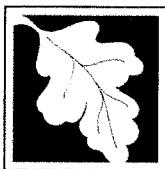
3. Check date

4. State Check Number

5. Check date

6. Payor name on check: First Name

7. Payor name on check: Last Name



Massachusetts Department of Environmental Protection

Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

MassDEP File Number

Document Transaction Number

Littleton

City/Town

F. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Notice of Intent and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge. I understand that the Conservation Commission will place notification of this Notice in a local newspaper at the expense of the applicant in accordance with the wetlands regulations, 310 CMR 10.05(5)(a).

I further certify under penalties of perjury that all abutters were notified of this application, pursuant to the requirements of M.G.L. c. 131, § 40. Notice must be made by Certificate of Mailing or in writing by hand delivery or certified mail (return receipt requested) to all abutters within 100 feet of the property line of the project location.

Att 51m

11/10/2025

1. Signature of Applicant

B. Mettei

2. Date

11/25/2025

3. Signature of Property Owner (if different)

SVT

4. Date

December 12, 2025

5. Signature of Representative (if any)

6. Date

For Conservation Commission:

Two copies of the completed Notice of Intent (Form 3), including supporting plans and documents, two copies of the NOI Wetland Fee Transmittal Form, and the city/town fee payment, to the Conservation Commission by certified mail or hand delivery.

For MassDEP:

One copy of the completed Notice of Intent (Form 3), including supporting plans and documents, one copy of the NOI Wetland Fee Transmittal Form, and a **copy** of the state fee payment to the MassDEP Regional Office (see Instructions) by certified mail or hand delivery.

Other:

If the applicant has checked the "yes" box in any part of Section C, Item 3, above, refer to that section and the Instructions for additional submittal requirements.

The original and copies must be sent simultaneously. Failure by the applicant to send copies in a timely manner may result in dismissal of the Notice of Intent.



DIVISION OF
FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

**MA ENDANGERED SPECIES ACT (G.L. c.131A)
CONSERVATION AND MANAGEMENT PERMIT**

DATE	September 6, 2024
CONSERVATION PERMIT No.	CMP-87309
NHESP FILE No.	23-4202, RC-85971
PERMIT HOLDER	Matt Silverman Littleton Electric Light & Water Department 39 Ayer Road Littleton MA 01460
PROJECT	Littleton-Boxborough Water Supply Connection: Trumbull Well

A. Permit Authority

Pursuant to the authority granted in the Massachusetts Endangered Species Act ("MESA") (G.L. c. 131A) and its implementing regulations (321 CMR 10.23), the Director of the Massachusetts Division of Fisheries & Wildlife (the "Division") hereby issues a Conservation and Management Permit (the "Permit") to Littleton Electric Light & Water Department ("LELWD") (the "Permit Holder"). This Permit authorizes the Take of the [REDACTED] which is State-listed as Threatened, pursuant to the MESA, arising out of the construction of a new municipal groundwater well to supply water to both the Town of Littleton and a portion of the Town of Boxborough (the "Project") on a ±58.4 acre site at 153 Taylor Street located between Beaver Brook and Taylor Street and south of Captain Isaac David Highway (aka Route 2) in the Town of Littleton, Massachusetts (Book 79319, Page 596, Middlesex South County Registry of Deeds; the "Property", Attachment 1).

Work subject to this determination is proposed on the following properties. All pending access agreements will be completed prior to MESA-authorized work.



**Narrative to Accompany Notice of Intent
Habitat Enhancement
0 Whitcomb Ave
Littleton, MA**

Introduction

Oxbow Associates, Inc. (OA) reviewed the above-referenced property on February 25 and March 13, 2025, to evaluate the feasibility of creating a habitat enhancement area adjacent to Beaver Brook. The proposed project serves as a portion of the overall mitigation required for the installation of the Littleton Electric Light and Water Department's (LELWD) Trumbull Well, as proposed by the approved Conservation and Management Permit (CMP; CMP-87309) issued by the Natural Heritage and Endangered Species Program (NHESP) on September 6, 2024.

Although the work meets eligibility for an Ecological Restoration Limited Project, it is being filed as a standard Notice of Intent at the request of the Littleton Conservation Commission.

Existing Conditions

The subject property (Parcel R13-5-0) is southeast of Whitcomb Avenue, south of MA Route 2, and west of Interstate 495. The 21.4±-acre parcel, part of the Sudbury Valley Trustees' (SVT) Smith Conservation Land, consists primarily of forested uplands with a loop trail. A portion of the Site extends on a peninsula to the east, adjacent to an expansive emergent marsh. Beaver dams located downstream have elevated the water level and created ponds within this portion of the marsh.

Wetland resource areas were delineated by others in May 2020. In 2025, OA reviewed the wetland boundary in the field using standard methods for delineation under the Act and Bylaw and confirmed the accuracy of the wetland boundary and transposed the old flag locations from the old plan to the attached Figure.

OA examined potential resource areas on the property which included Bordering Vegetated Wetlands (BVW; 310 CMR 10.55), Bordering Land Subject to Flooding (BLSF, 100-year floodplain; 310 CMR 10.57), and Riverfront Area (310 CMR 10.58) associated with Beaver Brook.

According to NHESP's Natural Heritage Atlas (15th Edition, effective August 1, 2021) of and 2021 MassGIS layers, the Site lies within Estimated and Priority Habitats of Rare Species (EH1104, PH1625). A separate MESA Checklist review has been completed, and a CMP was issued for the well construction project; this project is part of the required mitigation for habitat improvement. There are no Certified (CVP) or Potential Vernal Pools (PVP) mapped on the Site.

Resource Area Description

The BVW boundary nearest the proposed work was determined based on site topography, predominance of wetland vegetation, and hydrologic indicators, including surface water and soil saturation and is marked with pink plastic flags labeled A6 through A62. BVW on and adjacent to the Site is subject to variation depending on the impoundment and seasonal flooding associated with beaver activity in Beaver Brook.

Representative wetland vegetation includes red maple (*Acer rubrum*) saplings, highbush blueberry (*Vaccinium corymbosum*), broad-leaved cattail (*Typha latifolia*), skunk cabbage (*Symplocarpus foetidus*), sensitive fern (*Onoclea sensibilis*), cinnamon fern (*Osmunda cinnamomeum*), and tussock sedge (*Carex stricta*).

Soils within the proposed project area are mapped as Quonset sandy loam, classified by NRCS as “excessively drained.”

Beaver Brook is classified as a perennial stream on the latest USGS quadrangle, and the USGS StreamStats application calculates the drainage area to be $4.4\pm$ square miles, affirming its perennial status. The resource area associated with the flow of Beaver Brook is Riverfront Area, the origin of which is determined by the Mean Annual High-water (MAHW) boundary.

The Mean Annual High-Water (MAHW) line of Beaver Brook is currently difficult to distinguish because it is obscured by elevated surface water resulting from beaver activity. To accurately estimate the MAHW line, historic aerial imagery from MassGIS (photographed on May 1, 1995) was used to discern and digitize the existing stream channel prior to the beaver activity. The 200-foot Outer Riparian Zone extending from the digitized channel is provided on the Proposed Wildlife Habitat Enhancement Figure. This methodology of utilizing pre-impoundment aerial imagery has been previously accepted by MA DEP and local conservation commissions for MAHW determinations within beaver-influenced wetlands.

The USGS StreamStats application calculates predicted streamflow statistics and hydraulic geometry (such as bankfull width and area) based upon the watershed size and other regional basin characteristics. Using the application, at the location nearest to the Site, the approximate bankfull width of Beaver Brook is calculated to be 26.6 feet, with a depth measuring approximately 1.4 feet, producing a bankfull cross-sectional area of 37.9 feet². This calculation generally matches the dimensions of the digitized stream channel prior to beaver activity.

Applying the regulatory criteria for MAHW delineation under 310 CMR 10.58, which is based on the visible markings or changes in character of soil or vegetation, incorrectly includes the extent of the cattail marsh to define the bankfull limit of Beaver Brook, conflating the true channel with the floodplain. Utilizing the extent of the cattails as the MAHW boundary would yield a bankfull width of >710 feet (at the narrowest point on the site). With an assumed depth of 6-inches, this results in a bankfull area of $>355\pm$ foot², which is nearly ten times the predicted $37.9\pm$ foot². Therefore, based on a combination of historic imagery and hydrological analysis, we conclude the digitized historical channel represents the most accurate MAHW boundary of Beaver Brook. The Riverfront Area depicted on the Figure extends 200 feet from the digitized boundary (Outer Riparian Zone), and does not extend onto the subject property or proposed project area.

There is also BLSF associated with Beaver Brook. The mapping indicates that the flood elevation is restricted to the slopes associated with the BVW boundary. According to the FEMA Flood Insurance Rate Map (25017C0219G, eff. July 8, 2025), the property is subject to a 100-year flood elevation of 226.2 feet.

Proposed Project

The Applicant proposes to create $0.9\pm$ acre of early-successional habitat consistent with the approved CMP issued by MA NHESP. The goal is to establish exposed patches of mineral-soil with <50% vegetative cover and sparse structural elements in suitable proximity to wetland habitat.

Because of the nature of the work, the project occurs within the Buffer Zone to BVW but has been designed to remain outside the 50-foot buffer. Prior to land disturbance, erosion and sedimentation controls (silt fence and straw wattles) will be installed along the approved limit of work.

Habitat Enhancement Activities

- **Selective clearing.** Trees and woody vegetation, including stumps, will be cut and removed from the Site. Species proposed for removal include eastern white pine (*Pinus strobus*), red oak (*Quercus rubra*), white oak (*Q. alba*), American elm (*Ulmus americana*), yellow birch (*Betula alleghaniensis*), red maple, and black cherry (*Prunus serotina*). A total of 31 trees and approximately 25 saplings are proposed for removal. Selected oak trees requested by SVT will remain. Herbaceous/groundcover vegetation will be bladed into windrows or removed to expose mineral soils.
- **Stripping of topsoil and microtopography.** Using tracked equipment, contractors will remove topsoil to reveal mineral subsoils and create ridges and mounds to diversify microtopography. The intent is to have undulating topography, without depressions where water could collect and infiltrate. Stripped topsoil will be removed from the site or placed along the perimeter and graded to promote drainage away from the work area into flat areas for recharge.
- If the exposed native mineral soil is not acceptable for the proposed dry, xeric habitat, a fine sand (<5% clay and <25% gravel) should be deposited over the parent material to a depth of approximately 12 inches. A permeable tarp may be placed under the sand to reduce the recurrence of sprouting vegetation. Sand cover up to 10-12 inches in depth may also be used to minimize growth of vegetation.
- **Planting and structure.** Where feasible, non-spreading bunch grasses, including little bluestem (*Schizachyrium scoparium*) salvaged from areas on-site, will be transplanted at 50-foot spacing within the cleared area. If specimens are not located onsite, the plantings can be purchased and installed, or an acceptable seed mix from New England Wetland Plants, Inc. will be applied at the completion of work to promote sparse vegetation. Coarse woody material and selected boulders will be sparsely and randomly distributed to provide limited structure, break sightlines, to create microhabitats.
- **Field flexibility.** Minor, in-field adjustments (e.g., final microtopography, planting locations, debris distribution) may be made to meet habitat performance objectives.

Upon completion, the managed area will function as early-successional habitat with intentionally sparse vegetation, poor nutrient, sandy soil, very little shade, and structural elements.

Construction Period Controls

- **Perimeter BMPs.** Install silt fence and straw wattles along the work perimeter before construction and maintain them throughout construction
- **Inspection frequency.** Inspect controls after rainfall/storm events and at least weekly while work is active; repair or augment as needed.

- **Access and staging.** Use the existing access path northwest of the project area. Any necessary stockpiles and equipment staging will be located outside the buffer zone to BVW and protected from erosion.

Avoidance and Minimization — Effects on Common Wildlife Species

Beginning in 2021, SVT initiated habitat restoration efforts (DEP #204-920) to address invasive and non-native plants, including the removal of Asiatic bittersweet (*Celastrus orbiculatus*), European larch (*Larix decidua*), and red pine (*Pinus resinosa*) throughout the property. Their eradication has effectively opened the canopy, transforming the previously uniform understory. This project seeks to further diversify the area by providing and maintaining ecologically important early successional habitat.

Utilizing the recently restored habitat, the project is designed to avoid and minimize impacts to both sensitive and common wildlife species that typically use upland edges and mixed forest habitats (e.g., white-tailed deer, eastern cottontail, gray squirrel, raccoon, common songbirds such as robins and chickadees, wild turkey, and common herpetofauna such as garter snakes).

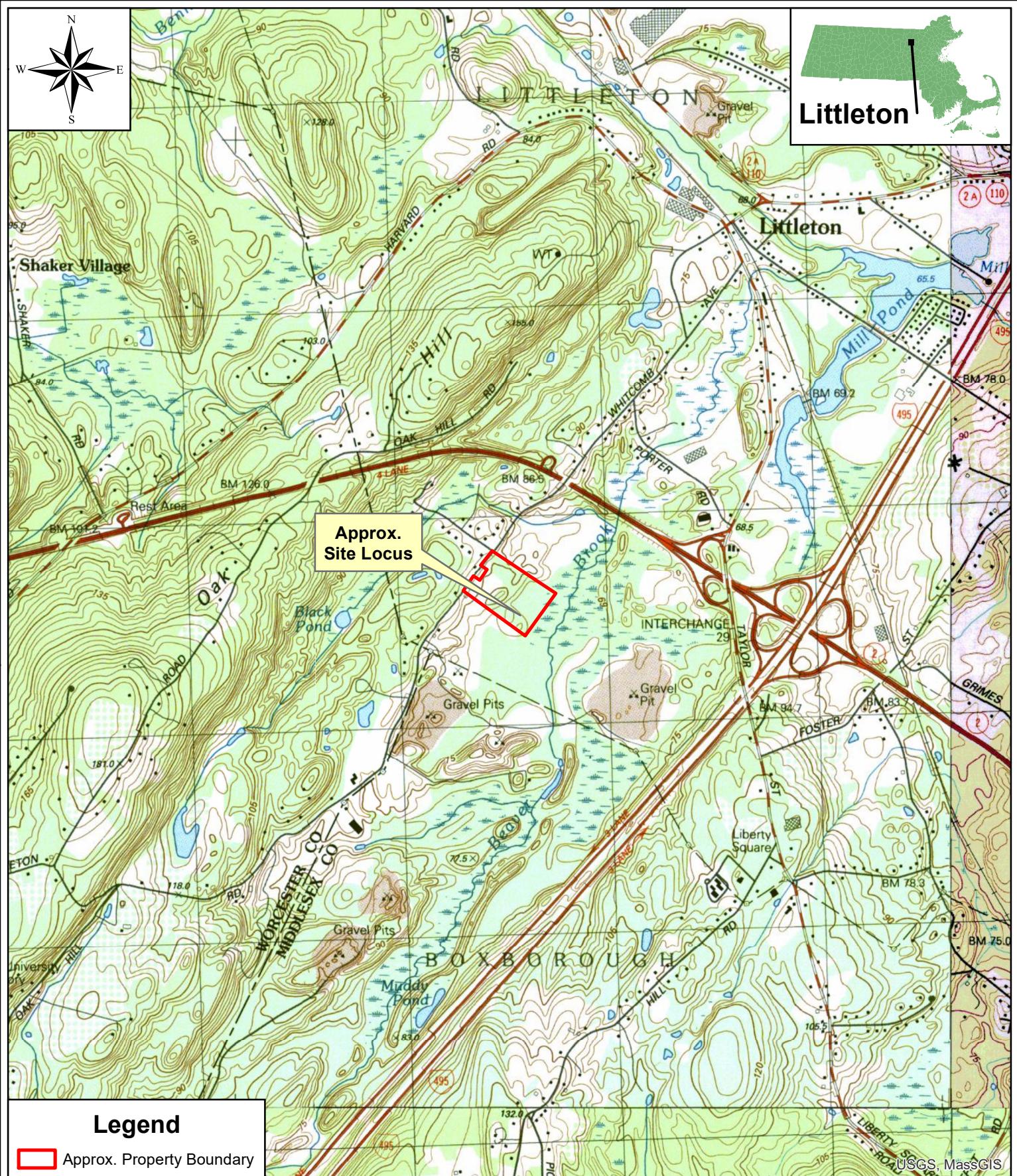
Key avoidance/minimization features include:

1. All activity remains outside the 50-ft No-Disturbance setback, protecting core wetland functions (hydrology, habitat, water quality) and travel corridors.
2. The enhancement area is 0.9± acre within a much larger conservation landscape (21.4± acres), maintaining abundant undisturbed habitat and connectivity. Construction duration is brief, reducing temporal disturbance.
3. Surrounding forest and shrub layers remain intact, preserving movement corridors and refugia for small mammals, birds, and reptiles/amphibians.
4. BMPs for erosion and sedimentation control measures are included to prevent sediment transport and protect adjacent BVW habitat and water quality.
5. The resulting early-successional opening adds structural and seral diversity beneficial to many common species (e.g., field/edge songbirds, insects, mammals, amphibians, and basking reptiles). Sparse perches, scattered coarse woody debris, and microtopographic variation create foraging and cover opportunities while maintaining overall low vegetation density per CMP objectives.
6. Monitoring during and after work will detect invasive plant colonization and recommend rapid response to minimize degradation of habitat quality.

Based on these measures and the preservation of extensive adjacent habitat, the project will not adversely affect common wildlife species and is expected to enhance habitat diversity at the Site.

Summary

As proposed, the project provides part of the Net Benefit habitat mitigation required under the CMP and avoids adverse impacts to wetland resource areas and common wildlife species. Work is confined to the outer 50 feet of the BVW buffer zone, incorporates appropriate erosion control BMPs, and includes post-construction monitoring (reported to NHESP) to confirm performance and habitat quality.



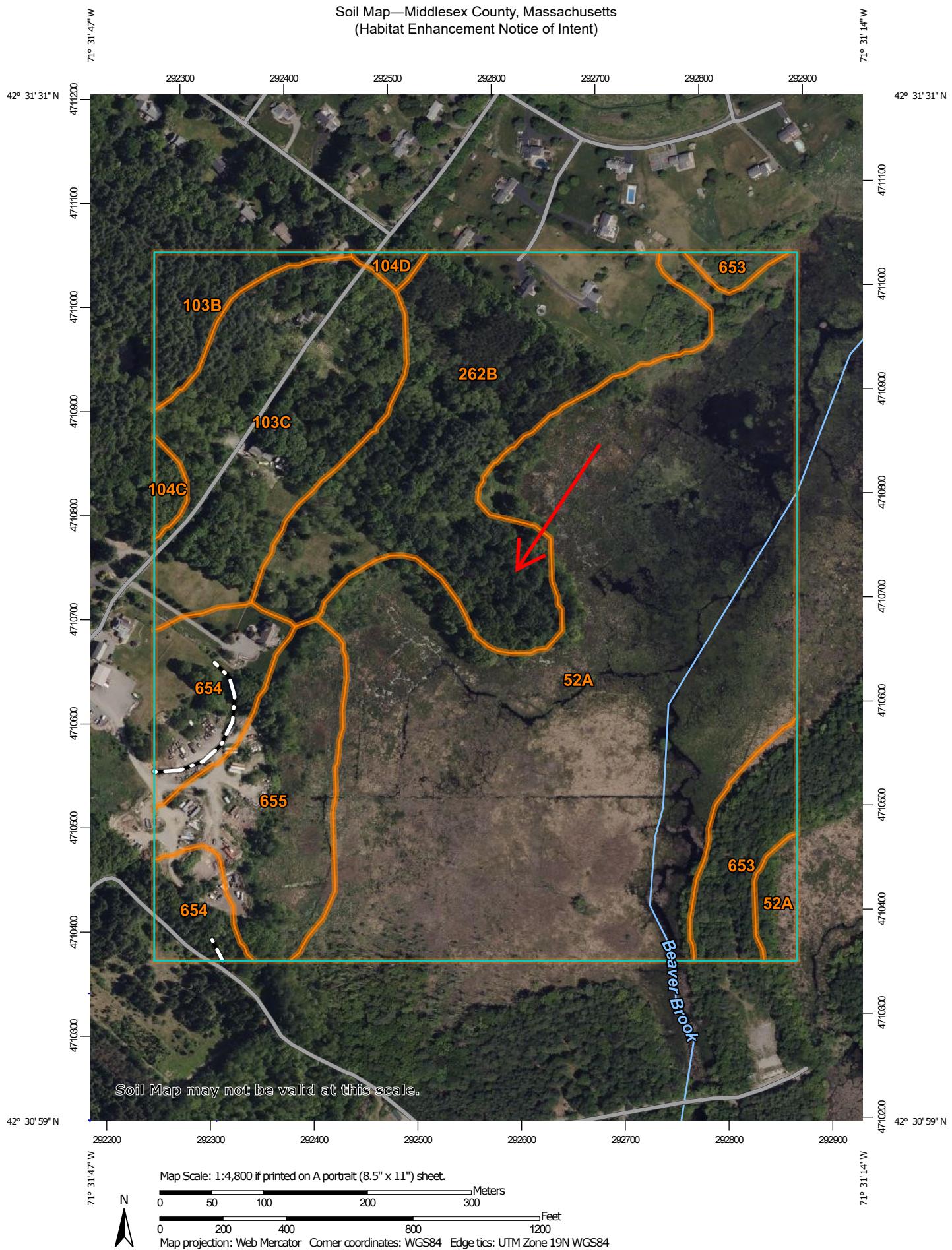
1:24,000

1 inch = 2,000 feet

0 2,000 4,000
Feet

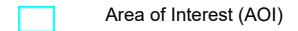
USGS Topographical Quad
LELWD Notice of Intent
Habitat Enhancement
Littleton, MA

Soil Map—Middlesex County, Massachusetts (Habitat Enhancement Notice of Intent)



MAP LEGEND

Area of Interest (AOI)



Area of Interest (AOI)

Soils



Soil Map Unit Polygons



Soil Map Unit Lines



Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



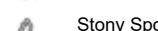
Slide or Slip



Sodic Spot



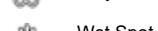
Spoil Area



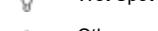
Stony Spot



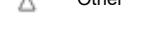
Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



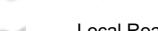
Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Middlesex County, Massachusetts

Survey Area Data: Version 25, Sep 5, 2025

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: May 22, 2022—Jun 5, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.



Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
52A	Freetown muck, 0 to 1 percent slopes	51.3	49.0%
103B	Charlton-Hollis-Rock outcrop complex, 3 to 8 percent slopes	2.5	2.4%
103C	Charlton-Hollis-Rock outcrop complex, 8 to 15 percent slopes	12.8	12.2%
104C	Hollis-Rock outcrop-Charlton complex, 0 to 15 percent slopes	0.5	0.5%
104D	Hollis-Rock outcrop-Charlton complex, 15 to 25 percent slopes	0.4	0.3%
262B	Quonset sandy loam, 3 to 8 percent slopes	19.1	18.2%
653	Udorthents, sandy	3.9	3.7%
654	Udorthents, loamy	6.0	5.7%
655	Udorthents, wet substratum	8.2	7.9%
Totals for Area of Interest		104.6	100.0%

National Flood Hazard Layer FIRMette



71°31'49"W 42°31'30"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS

- Without Base Flood Elevation (BFE) Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway

0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X

Future Conditions 1% Annual Chance Flood Hazard Zone X

Area with Reduced Flood Risk due to Levee. See Notes. Zone X

Area with Flood Risk due to Levee Zone D

NO SCREEN Area of Minimal Flood Hazard Zone X

Effective LOMRs

Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

20.2 Cross Sections with 1% Annual Chance

17.5 Water Surface Elevation

8 - - - Coastal Transect

~~~ 513 ~~~ Base Flood Elevation Line (BFE)

Limit of Study

Jurisdiction Boundary

Coastal Transect Baseline

Profile Baseline

Hydrographic Feature

Digital Data Available

No Digital Data Available

Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/28/2025 at 1:37 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



**TOWN OF LITTLETON  
BOARD OF ASSESSORS**

P.O. BOX 1305  
LITTLETON, MA 01460  
(978) 540-2410  
FAX: (978) 952-2321

Date: \_\_\_\_\_

Re: Certified List of Abutters Conservation Commission

Applicant: \_\_\_\_\_

Name of Firm: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

**Subject Parcel Location:** \_\_\_\_\_

**Subject Parcel No.:** \_\_\_\_\_

**Subject Owner Name:** \_\_\_\_\_

M.G.L. Chapter 131: Section 40 ..... "Any person filing a notice of intention with a conservation commission shall at the same time give written notification thereof, by delivery in hand or certified mail, return receipt requested, to all abutters within one hundred feet of the property line of the land where the activity is proposed, but not limited to, owners of land directly opposite said proposed activity on any public or private street or way, and in another municipality or across a body of water. When a notice of intent proposes activities on land under water bodies and waterways or on a tract of land greater than 50 acres, written notification shall be given to all abutters within 100 feet of the proposed project site. For the purposes of this action, "project site" shall mean lands where the following activities are proposed to take place: dredging, excavating, filling, grading, the erection, reconstruction or expansion of a building or structure, the driving of pilings, the construction or improvement of roads or other ways and the installation of drainage, sewerage and water systems, and "land under water bodies and waterways" shall mean the bottom of, or land under, the surface of the ocean or an estuary, creek, river stream, pond or lake. When a notice of intent proposes activity on a linear shaped project site longer than 1,000 feet in length, notification shall be given to all abutters within 1,000 feet of the proposed project site. If the linear project site takes place wholly within an easement through another person's land, notice shall also be given to the landowner. Said notification shall be at the applicant's expense, and shall state where copies of the notice of intention may be examined and obtained and where information regarding the date, time and place of the public hearing may be obtained. Proof of such notification, with a copy of the notice mailed or delivered, shall be filed with the conservation commission." .....

**I hereby certify the attached list of abutter (s) as stated in the M.G.L. Chapter 131, Section 40.**

Number of Abutter(s) \_\_\_\_\_ including the subject parcels \_\_\_\_\_ Applicant Requesting Abutter's List.

**Certified by:**

Name: \_\_\_\_\_

Title: \_\_\_\_\_

177 WHITCOMB AV R13 2 G  
WHITCOMB AVE 2021 REALTY TRUST  
LUC: 101  
TRUSTEE O'CONNELL KEVIN D  
177 WHITCOMB AVE  
LITTLETON, MA 01460

WHITCOMB AV R13 7 0  
SUDSBURY VALLEY TRUSTEES INC  
18 WOLBACH RD  
SUDSBURY, MA 01776

172 WHITCOMB AV R13 3 1  
LUC: 101  
COTNAM DALE R  
COTNAM SUSAN M  
172 WHITCOMB AVE  
LITTLETON, MA 01460

WHITCOMB AV R13 7 1  
LUC: 106  
SCHRAMM MARTIN  
120 HAYDEN ROWE ST  
HOPKINTON, MA 01748

OFF WHITCOMB AV R13 3 15  
LUC: 930  
LITTLETON TOWN OF  
P O BOX 1305  
LITTLETON, MA 01460

OFF WHITCOMB AV R13 7 A  
LUC: 950  
LITTLETON CONSERVATION TRUST  
PO BOX 594  
LITTLETON, MA 01460

170 WHITCOMB AV R13 3 2  
LUC: 101  
SUSAN C RUSCAK INVESTMENT TRST  
TRUSTEE RUSCAK SUSAN C  
170 WHITCOMB AVENUE  
LITTLETON, MA 01460

199 WHITCOMB AV R13 8 0  
LUC: 950  
SUDSBURY VALLEY TRUSTEES INC  
18 WOLBACH RD  
SUDSBURY, MA 01776

181 WHITCOMB AV R13 4 1  
LUC: 101  
GAIBL MARTHA A  
GAIBL KARL A  
181 WHITCOMB AV  
LITTLETON, MA 01460

WHITCOMB AV R13 5 0  
LUC: 950  
SUDSBURY VALLEY TRUSTEES INC  
18 WOLBACH RD  
SUDSBURY, MA 01776

WHITCOMB AV R13 5 1  
LUC: 132  
WALSH JESSE  
WALSH KAEDRA  
189 WHITCOMB AVE  
LITTLETON, MA 01460

OFF WHITCOMB AV R13 5 A  
LUC: 950  
LITTLETON CONSERVATION TRUST  
P O BOX 594  
LITTLETON, MA 01460

WHITCOMB AV R13 6 0  
LUC: 950  
SUDSBURY VALLEY TRUSTEES INC  
18 WOLBACH RD  
SUDSBURY, MA 01776

189 WHITCOMB AV R13 6 1  
LUC: 101  
WALSH JESSE  
WALSH KAEDRA  
189 WHITCOMB AV  
LITTLETON, MA 01460

## NOTIFICATION TO ABUTTERS

**Pick one:**

- Notice of Intent/Abbreviated NOI**
- Abbreviated Notice of Resource Area Delineation**
- Request for Determination of Applicability**
- Request to Amend an Order of Conditions (MADEP File # 204 \_\_\_\_\_)**

### Modification for Virtual Meetings

*Under MA Wetlands Protection Act and Littleton Wetlands Protection ByLaw (Chapter 171), this form must be completed and mailed, certified mail return receipt requested, to all abutters at their mailing addresses shown on the most recent Town Assessor's records as well as the owner (if not applicant).*

In accordance with the MA Wetlands Protection Act and Littleton Wetlands Protection ByLaw Chapter 171-2D, you are hereby notified of a public hearing on the matter described below:

- A. The applicant has filed a permit application with the Littleton Conservation Commission for work in an area subject to protection under the Massachusetts Wetlands Protection Act and Littleton Wetlands Protection ByLaw.
- B. The name of the applicant is \_\_\_\_\_
- C. The address of the land where the activity is proposed is \_\_\_\_\_
- D. The work proposed is \_\_\_\_\_
- E. Copies of the filing may be examined at the Conservation Commission office at 37 Shattuck Street Monday through Thursday; 9:00 – 1:00 (please call first to ensure the Conservation Agent is available and not out on site visits). The office phone number is 978-540-2428.
- F. Copies of the filing may be obtained electronically from (check one) the \_\_\_\_\_ applicant or \_\_\_\_\_ the applicant's representative by calling \_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_ during the following times:  
\_\_\_\_\_

G. The public hearing/meeting will be held on \_\_\_\_\_. Information regarding the date and time of the public hearing/meeting may be obtained from the Littleton Conservation Commission (see contact info at the end of this notice).

H. Notice of the public hearing/meeting, including date and time will be published at least five business days in advance in a paper of local circulation. The agenda, noting times will be posted at Town Hall and at <https://ma-littleton.civicplus.com/AgendaCenter/Search/?term=&CIDs=13,&startDate=&endDate=&dateRange=&dateSelector=> at least 48 hours in advance of the meeting. It is currently anticipated that this meeting will be held entirely remotely, pursuant to “An Act Relative to Extending Certain State of Emergency Accommodations” (July 16, 2022) and the extension of that Act through March 21, 2025. If the meeting is held remotely, instructions for remote viewing of, and participation in, the meeting will be included in the agenda and may also be obtained from the Littleton Conservation Commission.

You may contact the Littleton Conservation Commission staff ([Conservation@littletonma.org](mailto:Conservation@littletonma.org); 978-540-2428), or the Massachusetts Department of Environmental Protection/ Central Region (508-792-7650) at 8 New Bond Street, Worcester, MA 01606 for information about this application

## AFFIDAVIT OF SERVICE

*Under Massachusetts Wetlands Protection Act and the Littleton Wetlands Protection ByLaw (Chapter 171), this form must be completed and submitted with the Notice of Intent, Abbreviated Notice of Resource Area Delineation or Request for Determination of Applicability.*

I, Ronald Strohsahl *(name of applicant or representative)* certify under the pains and penalties of perjury that on 12/15/25 *(date)* I gave notification to abutters in compliance with the second paragraph of the Massachusetts General Laws Chapter 131, Section 40, DEP requirements for Abutter Notification and with the Littleton Wetlands ByLaw 171-2.D in connection with the following matter:

A *(choose one of below)*

Abbreviated Notice of Resource Area Delineation

Request for Determination of Applicability

Notice of Intent / Abbreviated Notice of Intent

Request for Amended Order of Conditions (MADEP File # 204-\_\_\_\_\_)

has been filed under the Massachusetts Wetlands Protection Act and Littleton Wetlands Protection ByLaw by the Littleton Electric Light & Water Department with the Littleton Conservation Commission on 12/15/25 *(date)* for the property located at 0 Whitcomb Avenue (R13-5) *(address of land where work is proposed)*.

The list of abutters with their addresses and a copy of the Notification Abutter form as sent to the abutters is attached to this Affidavit of Service.

Ronald H. Strohsahl

December 15, 2025

Name

Date

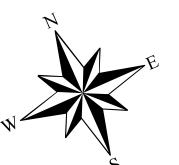


Proposed Wildlife  
Habitat Enhancement

Sudbury Valley Trustees

LELWD Trumbull Well  
Littleton, MA

November 20, 2025



0 25 50 100  
Feet

**Legend**

- Habitat Enhancement Area
- Access Path
- Wetland Line
- 50ft BVW Buffer
- 100ft BVW Buffer
- 200ft Outer Riparian Zone
- Stone Wall
- FEMA Flood Zone AE
- Property Parcels

**OXBOW**  
ASSOCIATES, INC.

MassGIS