

July 1, 2022

Bethany A. Card, Secretary  
Executive Office of Energy and Environmental Affairs  
Attention: Alexander Strysky, MEPA Office  
100 Cambridge St.  
Boston, Massachusetts 02114

<i>Proponent:</i>	<i>Project Name:</i>	<i>1 and 2 Monarch Drive Littleton</i>
	<i>V.M.D. Companies V LLC</i>	
	<i>Location:</i>	<i>Monarch Drive Littleton</i>
	<i>Document Reviewed:</i>	<i>Expanded Environmental</i>
	<i>Notification Form</i>	
<i>EEA No.:</i>	<i>16568</i>	
<i>NHESP No.:</i>	<i>07-22228</i>	

Dear Secretary Card:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) has reviewed the Expanded Environmental Notification Form for the proposed *1 and 2 Monarch Drive Littleton Project* and would like to offer the following comments regarding state-listed rare species and their habitats.

On November 17, 2009, the Division issues a Conservation and Management Permit (CMP) (009-136.DFW) for the above referenced project. The CMP has expired and as a result the Project Proponent has been in productive consultation with the Division regarding next steps. Based on initial consultation with the Proponent, the Project revisions are similar to what was originally permitted in 2009.

Projects resulting in a Take of state-listed species may only be permitted if they meet the performance standards for a Conservation and Management Permit (CMP; 321 CMR 10.23). In order for a project to qualify for a CMP, the applicant must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species.

The Proponent has proactively consulted with the Division to avoid, minimize and mitigate impacts to state-listed species and their habitats associated with proposed project, and it is our understanding that it intends to apply for a new CMP.

In our view, the Proponent has and continues to work constructively with the Division to proactively address rare species issues and permitting requirements associated with this project.

Please note that the Division will not render a final decision until a CMP Application has been submitted and the Massachusetts Environmental Policy Act (MEPA) review process has been completed.

We appreciate the opportunity to comment on this project. If you have any questions about this letter, please contact David Paulson, Senior Endangered Species Review Biologist, at (508) 389-6366 or [david.paulson@state.ma.us](mailto:david.paulson@state.ma.us).

**David Paulson**

Senior Endangered Species Review Biologist  
Massachusetts Division of Fisheries & Wildlife  
1 Rabbit Hill Road, Westborough, MA 01581  
Temporary Phone: (845)-262-0481 | e: [david.paulson@state.ma.us](mailto:david.paulson@state.ma.us)  
[mass.gov/masswildlife](http://mass.gov/masswildlife) | [facebook.com/masswildlife](https://facebook.com/masswildlife)