



MEMORANDUM

August 27, 2025

To: Tim Pearson, Conservation Agent
From: James Thorne, PE, Business Manager IV
Sam Spelman, Scientist II
Date: August 27, 2025
Project Name: Littleton CC – 550 King Street Peer Review
Project Number: Green No. 25008.05XX
Subject: Field Review and Investigation of the Wetland Delineation at 550 King Street, Littleton, MA

On August 18, 2025, Green International Affiliates, Inc. conducted an on-site review of the resource area delineation performed by Hancock Associates at 550 King Street in Littleton, Massachusetts. This peer review aims to assess the accuracy and compliance of the flagging with current regulatory standards and best practices.

The review included a complete site walk by a staff Wetland Scientist, and a review of the flags which were placed by Hancock Associates. Soil samples were taken periodically to supplement the evidence provided by the observed vegetation and hydrologic evidence. Wetland flag Series “A100-A118 and A119-A123” accurately represents the boundaries of the delineated Bordering Vegetated Wetland (BVW). However, a section of the A-Series wetland, between flags A118 and A119, was found to have been flagged northward of the BVW boundary as observed during the site visit, based on the professional opinion of the staff Wetland Scientist and field indicators.

A forested area located to the south of wetland flags (WFs) #A118 and #A119 was identified as an upland area during Hancock Associates’ assessment. However, the vegetation community in this area was dominated by a number of hydrophytic plant species, including sensitive fern (*Onoclea sensibilis*), skunk cabbage (*Symplocarpus foetidus*), jewelweed (*Impatiens capensis*), reed canary grass (*Phalaris arundinacea*), and purple loosestrife (*Lythrum salicaria*). This area also contained strong evidence of hydrology, including soil saturation and a high water table. Hydric soil indicators were not encountered in this area; however, the soil profile at this location was heavily disturbed by fill material, likely explaining the uncharacteristic soils observed in this area. Despite the lack of hydric soils at this location, the abundance of hydrophytic vegetation and extensive hydrologic indicators has led our staff Wetland Scientist to conclude that this area should be classified as part of the A-Series BVW.

The staff Wetland Scientist’s recommendation is to extend the wetland boundary to include the above-referenced area, which has been flagged in the field with pink flags labeled “GIA-WF-A119 and GIA-WF-A120”. These new flags shift the BVW boundary approximately 10 feet south in the identified area. The Wetland Scientist’s disagreement with the resource area delineation concludes at Hancock Associates’ WF #A119, and they concur with the placement of the remainder of the A-Series boundary. Including

these additional flags will ensure that the aforementioned area is included as part of the BVW delineated by the A-Series.

Additionally, the staff Wetland Scientist reviewed the wetland flag Series “B100-B134” and concurs with the boundaries of the delineated vegetated wetland. In order to assess the jurisdictional status of the B-Series wetland area, a combination of field investigations and document review were performed. While in the field, staff Wetland Scientists carefully examined the boundaries of the vegetated wetland for evidence of an outlet. No outlet was found, and the vegetated wetland appeared to occupy a closed basin based on field observations.

Green was provided with several historical documents to assist in the jurisdictional determination of the B-Series Wetland. Based on a review of these documents it appears that previous Notice of Intent (NOI) submissions had referred to the vegetated wetland in question as a Bordering Vegetated Wetland. An NOI submission from December 1996 and an As-Built Plan from April 2006 detail the proposed expansion of a parking lot and accompanying detention pond to the northwest of the identified wetland area; however, the plan sets do not depict the B-Series Wetland in its entirety. Green was also provided with an NOI submission from January 2007 and a plan set from March 2008 detailing proposed improvements to the property to the east of the B-Series Wetland. After reviewing these documents, it appears that two drainage outfalls discharge from the northwestern parking lot into the northwestern portions of the B-Series Wetland. Further, a 4” PVC pipe appears to discharge stormwater accumulated from the parking lot to the southeast into the wetland area in question. Green was unable to identify the PVC pipe’s outlet during the site assessment and anticipates it is currently buried by eroded sediments. Green did not identify any other inlets or outlets to the wetland system during our site assessment or document review. Because the only observable inlets to the wetland area connect to adjoining parking lots and not to a surface water feature, Green would not consider the B-Series Wetland to be a Bordering Vegetated Wetland. Green agrees with Hancock Associates’ interpretation that the B-Series wetland is a non-jurisdictional Isolated Vegetated Wetland.

In addition to the two identified wetland features delineated by Hancock Associates, Green identified two stormwater basins located directly south of Auman Street approximately 450 feet east of the A-Series BVW. According to historical aerial imagery, these detention ponds appear to have been constructed after November 18, 1996; therefore, they are not subject to regulation by the Wetlands Protection Act.

Please feel free to reach out to James Thorne, P.E., Green International Affiliates, Inc. at jthorne@greenintl.com if you have any questions or need further clarification regarding this review.

Figures

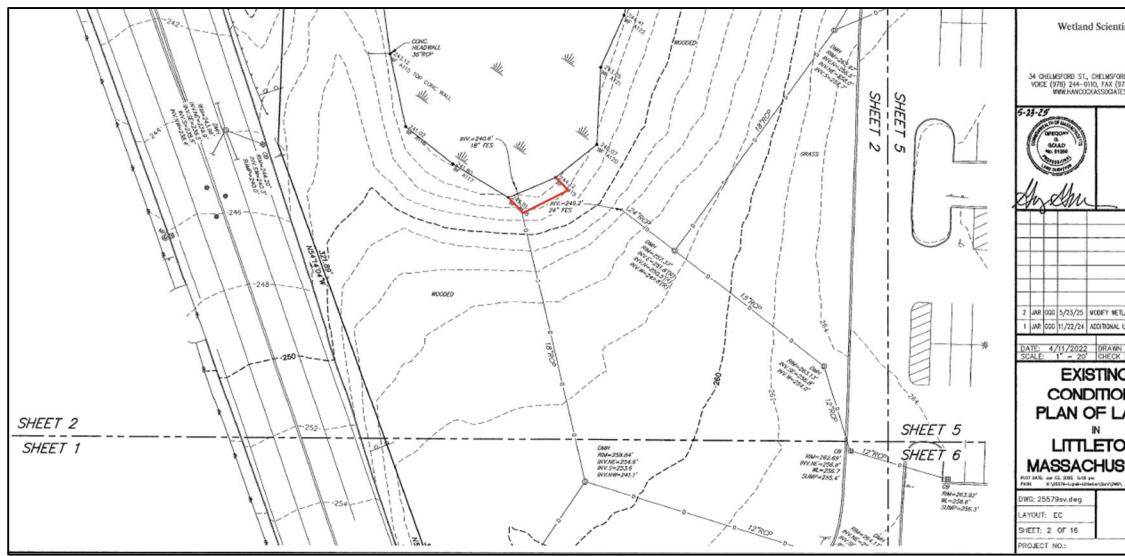


Figure 1: Recommended alteration to the A-Series BVW in red (addition of flags GIA-WF-119 and GIA-WF-120).



Figure 2: Representative view of the vegetation present within the BVW area that was excluded from Hancock Associates' A-Series BVW.



Figure 3: Representative view of the B-Series IVW from flag A-134.



Figure 4: Representative view of the 4" PVC pipe's outlet location within the B-Series IVW