



May 12, 2025

Planning Board  
37 Shattuck Street  
PO Box 1305  
Littleton, MA 01460

Re: Site Plan Review – 97 & 99 Mill Road  
Owner: Littleton Electric Light and Water Departments, 39 Ayer Rd, Littleton, MA 01460  
Applicant: Littleton BESS LLC

Dear Planning Board Members:

On behalf of the applicant, Citizens Energy ('Proponent'), The Morin-Cameron Group, Inc. ('MCG') hereby submits a Form 1 Application (Site Plan Review Application) to construct a new Battery Energy Storage System ('BESS') at 97 & 99 Mill Road which is owned by Littleton Electric Light & Water Departments (LELWD). The proposed project involves the construction of an enclosed electrical equipment area, five (5) utility poles that will service the electrical equipment area, removal of stockpiles, stabilization of gravel access areas and restoration of previously degraded/disturbed riverfront area. The proposed electrical equipment area includes four (4) BESS Enclosures, three (3) Transformers, one (1) 25kV SGU (Switchgear Unit) and one (1) BOS (Balance of System) Control Panel. The electrical equipment area is proposed to be put into service through proposed underground and overhead cables, a series of five (5) new utility poles will be installed along the existing access route and connected to an existing utility pole at the Northern corner of the property near the intersection of Warren Street and Mill Road.

The proposed BESS enclosure is situated along the boundary of Route 495 within a 4.4 acre property with frontage on Mill Road. The property is entirely developed between lot lines and Beaver Brook as a mill and lumberyard. The property was recently acquired by LELWD and now being used for municipal electric and light operations as well as other temporary contracting uses such as materials stockpiling. The property is within the Industrial B (IB) Zoning District. The property is bounded by Beaver Brook, a perennial stream which has a 200' riverfront area extending from its bank. LEC Environmental Consultants, Inc. ('LEC') conducted a site evaluation on April 17, 2024 to identify and delineate protectable Wetland Resource Areas associated with Beaver Brook. There is also a small isolated vegetated wetland located within the Route 495 right of way which has a 100' buffer zone under the Littleton Wetland Bylaw that extends into the site. In addition to the stream, according to the July 7, 2014 Federal Emergency Management Agency Flood Insurance Rate Map for Littleton, Massachusetts (Map No: 25017C0236F), the property is partially located within Zone X [Area determined to be outside of the 0.2% annual chance floodplain, Zone AE [Special flood hazard areas subject to inundation by the 1% annual chance flood: Base Flood Elevation of 214.2 feet (NAVD88) identified by "water surface elevation" as established at cross section "Q" and the Zone AE Floodway [*The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free*

*of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights]. The FEMA Flood Profile Baseline Elevation 214.2 (BLSF) was determined from an on-the-ground existing conditions instrument survey performed by MCG in April/June 2024 and is shown on the Plans.*

The proponent proposes to construct a 42' x 105'-4" fenced enclosure to secure the new electrical equipment. The enclosure is situated in a portion of the parcel as far from the stream as possible without impacting access to existing buildings and structures on the premises. Full access around the enclosure is also necessary for maintenance and emergency access. No changes to the rest of the property or buildings are proposed with this application. According to section 173-18 of the Zoning Bylaw, site plan applications must comply with 6 standards. A summary of each standard and how the project complies with each as follows:

*A. Internal circulation and egress are such that traffic safety is protected, and access via minor streets servicing single-family homes is minimized.*

The property is accessed from Mill Road, a public street. Existing curb cuts will be utilized with no changes proposed to the site access. The use does not require parking so the only vehicles accessing it are for maintenance or to tend to an emergency. Access around all sides of the enclosure have been provided for this purpose.

*B. Visibility of parking areas from public ways and residences is minimized, and lighting of these areas avoids glare on adjoining properties.*

There are no changes to the existing site conditions. The enclosure was situated in a location in the rear of the property, adjacent to the highway and not visible from Mill Road. There are no parking areas proposed for this use.

*C. Major topographic changes or removal of existing trees is minimized.*

There are no changes to existing topography proposed. Existing trees will be maintained except for pruning to remove limbs that hang over the enclosure. A portion of land along the stream will be restored.

*D. Adequate access to each structure for fire and service equipment is provided.*

Access is provided on all sides of the enclosure for emergency vehicle access.

*E. Utilities and drainage in the vicinity either are or will be made adequate, based on the functional standards of the Planning Board's Subdivision Regulations.*

New electric poles and buried conduit will be installed to the BESS. No other utilities are necessary for this use. No changes are necessary for stormwater management because of the reduction of impervious surface area from removing 2 accessory structures and restoring a portion of land from gravel driveway to restored buffer zone near the stream.

*F. Methods of stormwater control and treatment as outlined in the Town of Littleton Low Impact Design/Best Management Practices Manual (latest edition) are utilized to the maximum extent practicable.*

There are no changes proposed for stormwater management. The project will result in a reduction in impervious surface area by removing 2 concrete structures and the gravel mentioned above. The proponent proposes to remove and dispose of approximately 719 SF of existing sheds (2) where the proposed crushed stone access route will be constructed. The proposed electrical equipment area will add a total of 1,572 SF of impervious area (concrete pad platforms). The proposed removal/restoration of gravel and the addition of crushed stone will result in a net reduction of approximately 638 SF of gravel area on site. Overall, the project has been designed to reduce the amount of compacted gravel/impervious surfaces within the 100'/200' RFA, which results in a net reduction of impervious surfaces on site by 20,596 SF.

With the reduction in impervious area, mitigation of runoff is not necessary, and the project will improve its capacity to infiltrate stormwater by decreasing impervious area. The use also does not involve any paved surfaces with vehicles requiring treatment. During construction, erosion control measures will be deployed to ensure silt is contained on site during construction. The project fully complies with standards 1-10 of the Stormwater Management Handbook as a redevelopment project.

**Overlay Districts and Other Regulations:**

The project falls within the Water Resource Overlay District and the Aquifer Overlay District. The proposed use is a permitted use in the underlying Industrial B district and does not fall within the table of prohibited uses in these overlay districts. Accordingly, the use is permitted within these overlay districts.

There will be no work within the 100-year flood plain and no action necessary under the Flood Plain Overlay District.

The applicant has concurrently filed with the Conservation Commission for work within the Riverfront Area and buffer zone to an isolated wetland under the Wetlands Protection Act and Littleton Wetlands Bylaw.

The project consists of a municipal utility battery energy storage system that will have a minimal impact on the property. All work will occur within existing gravel portions of the premises. Restoration along the river has been included as part of the project and there will be a slight reduction in impervious area. All site plan review standards have been satisfied as documented herein. Accordingly, on behalf of the proponent, we humbly request the Board's vote in support of approving the site plan review for the project. Should you have any questions or concerns, or require additional information, please do not hesitate to contact the undersigned at 978-777-8586.

Sincerely,

**THE MORIN-CAMERON GROUP, INC.**



Scott P. Cameron, PE  
Vice President

DTS/SPC/kmm

Attachments

cc: Littleton BESS LLC