



January 4, 2013

**Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106-5127**

APT Project No.: CT283250

**Attn: Dawn McKay
via EMail**

**Re: NDDB Review Request
Homeland Towers Site No. CT005
1325 Cheshire Street
Cheshire, Connecticut**

Dear Ms. McKay,

All-Points Technology Corporation, P.C. ("APT") had previously submitted a Natural Diversity Data Base ("NDDB") State Listed Species Review request on behalf of Homeland Towers for a proposed wireless communications facility at 1325 Cheshire Street in Cheshire, Connecticut. APT understands that NDDB records reveal eastern box turtle (*Terrapene c. carolina*) and wood turtle (*Glyptemys insculpta*), both State Special Concern Species, in the vicinity of the proposed project¹.

The enclosed protective measures will be incorporated into the construction drawings (Development and Management Plans) should the project receive approval by the Connecticut Siting Council. Homeland Towers is committed to implementing these protective measures to avoid unintentional mortality to eastern box turtle or wood turtle as a result of proposed construction activities for the referenced facility. The proposed eastern box turtle and wood turtle protection program consists of several components: isolation of the project perimeter; periodic inspection and maintenance of isolation structures; turtle sweeps; awareness training of all contractors and sub-contractors prior to initiation of work on the site; protective measures; and, reporting. An example of the educational material that would be posted at the construction site as part of the contractor awareness component is also enclosed. With adherence to this eastern box turtle and wood turtle protection program, the proposed development at this property would not have an adverse effect on these state-listed species.

Please feel free to contact me by phone at (860) 984-9515 or via email at dgustafson@allpointstech.com with any questions or if additional information is required.

Sincerely,

Dean Gustafson
Senior Environmental Scientist

Enclosures

¹ Dawn McKay, personal communication, November 16, 2013.

Eastern Box Turtle and Wood Turtle Protection Plan

ENVIRONMENTAL NOTES

Eastern Box Turtle and Wood Turtle Protection Program

Eastern Box Turtle and Wood Turtle, both State Special Concern species afforded protection under the Connecticut Endangered Species Act, are known to occur on or within the vicinity of the site. The following protective measures, which satisfy requirements from the Connecticut Department of Energy & Environmental Protection (“CTDEEP”) Wildlife Division, will adequately protect these Special Concern species in the event that these turtles are encountered in the project area during construction activities. This protection plan is valid until January 5, 2014, at which point if construction has not been initiated, a new Natural Diversity Data Base review request from CTDEEP is required.

It is of the utmost importance that the Contractor complies with the requirement for the installation of protective measures and the education of its employees and subcontractors performing work on the project site if work will occur during the Eastern Box Turtle’s and Wood Turtle’s active period (April 1 to November 15). All-Points Technology Corporation, P.C. (“APT”) will serve as the Environmental Monitor for this project to ensure that Eastern Box Turtle and Wood Turtle protection measures are implemented properly and will provide an education session on Eastern Box Turtle and Wood Turtle prior to the start of construction activities. The Contractor shall contact Dean Gustafson, Senior Environmental Scientist at APT, at least 5 business days prior to the pre-construction meeting. Mr. Gustafson can be reached by phone at (860) 984-9515 or via email at dgustafson@allpointstech.com.

The proposed Eastern Box Turtle and Wood Turtle species protection program consists of several components: isolation of the project perimeter; periodic inspection and maintenance of isolation structures; education of all contractors and sub-contractors prior to initiation of work on the site; protective measures; and, reporting.

1. Isolation Measures

- a. Installation of conventional silt fencing, which will also serve as an isolation of the work zone from surrounding areas and required for erosion control compliance, shall be performed by the Contractor prior to any earthwork. APT will inspect the work zone area prior to and following barrier installation to ensure the area is free of Eastern Box Turtles and Wood Turtles prior to start of construction activities.
- b. The fencing will consist of conventional erosion control woven fabric, installed approximately six inches below surface grade and staked at seven to ten-foot intervals using four-foot oak stakes or approved equivalent. In addition to required daily inspection by the Contractor, the fencing will be inspected for tears or breaches in the fabric following installation and at either on a weekly or biweekly inspection frequency by APT. If inspections are performed on a biweekly basis, such inspections will also include inspections following storm events of 0.25 inch or greater. Inspections will be conducted by APT throughout the course of the construction project.
- c. Biweekly inspection reports (brief narrative and applicable photos) will be submitted to the Connecticut Siting Council for compliance verification. Any observations of Eastern Box Turtle or Wood Turtle will be reported to CTDEEP Wildlife Division.
- d. The extent of the barrier fencing will be as shown on the site plans. The Contractor shall have additional barrier fencing should field conditions warrant extending the fencing as directed by APT.

- e. No equipment, vehicles or construction materials shall be stored outside of barrier fencing.
- f. All silt fencing shall be removed within 30 days of completion of work and permanent stabilization of site soils so that reptile and amphibian movement between uplands and wetlands is not restricted.

2. Contractor Education:

- a. Prior to work on site, the Contractor shall attend an educational session at the pre-construction meeting with APT. This orientation and educational session will consist of an introductory meeting with APT providing photos of Eastern Box Turtles and Wood Turtles and emphasizing the non-aggressive nature of these animals, the absence of need to destroy animals that might be encountered and the need to follow Protective Measures as described in Section 3 below. Workers will also be provided information regarding the identification of other turtle species that could be encountered.
- b. The education session will also focus on means to discriminate between the species of concern and other native species to avoid unnecessary "false alarms". Encounters with any species of turtles will be documented.
- c. The Contractor will be provided with cell phone and email contacts for APT personnel to immediately report any encounters with Eastern Box Turtle, Wood Turtle or other turtle species. Educational poster materials will be provided by APT and displayed on the job site to maintain worker awareness as the project progresses.

3. Protective Measures

- a. Prior to the start of construction each day, the Contractor shall search the entire work area for Eastern Box Turtle and Wood Turtle.
- b. If a turtle is found, it shall be immediately moved, unharmed, by carefully grasped in both hands, one on each side of the shell, between the turtle's forelimbs and the hind limbs, and placed just outside of the isolation barrier in the approximate direction it was walking.
- c. Special care shall be taken by the Contractor during early morning and evening hours so that possible basking or foraging turtles are not harmed by construction activities.

4. Reporting

- a. Following completion of the construction project, APT will provide a summary report to CTDEEP documenting the monitoring and maintenance of the barrier fence.
- b. Any observations of Eastern Box Turtle or Wood Turtle will be reported to CTDEEP by APT, with photo-documentation (if possible) and with specific information on the location and disposition of the animal.

Eastern Box Turtle and Wood Turtle Posters

CAUTION

EASTERN BOX TURTLES ARE KNOWN TO INHABIT THIS AREA



Identification: Eastern Box Turtles (*Terrapene c. carolina*) are small, terrestrial turtles ranging from 4.5 to 6.6 inches in length. The shell (carapace) is readily distinguished by its high domed shaped. The color of the shell is brown or black with numerous irregular yellow, orange or reddish markings. The belly (plastron) typically has a light and dark variable pattern, but may be completely tan, brown or black. The head, neck and legs also vary in color but are generally dark with orange or yellow mottling. Box turtles are terrestrial and inhabit many types of habitats including deciduous forests, brushy fields, thickets, streams, ponds and wetlands.

What to do if you find a box turtle: Box turtles are protected by Connecticut's threatened and endangered species legislation and **cannot** be injured, killed, or retained as a pet. If you find a box turtle move the turtle to a safe location away from any construction activity in the direction that the turtle was heading. Carefully pick up the turtle by its shell (carapace) between the front and hind legs with both hands. Be sure to hold the turtle closer to their hind legs as they may reach over and bite if your hands are too close to the head. The turtle may hiss and should retract into its shell.

Who to contact: Please report any finds and relocation of Eastern Box Turtle immediately to **Dean Gustafson of All-Points Technology Corp., P.C. at (860) 984-9515.**

CAUTION

WOOD TURTLES ARE KNOWN TO INHABIT THIS AREA



Identification: Wood turtles (*Glyptemys insculpta*) are terrestrial turtles that may reach 6 to 8 inches in length. Although they are most often associated with rivers and large streams, their foraging habitat covers extensive areas of pature, woodlands and wetlands. The shell (carapace) is readily distinguished by its sculpted, rough, moderately-domed shaped. The color of the shell is brown or black with flared rear marginals (edge of the shell). The belly (plastron) is yellow with large black blotches or squares along the edges. The head and upper limbs are dark brown or black with yellow, orange or red wash on the under limbs. Large scales cover the forelimbs sometimes with red or orange highlights. olive, tan, or brown.

What to do if you find a wood turtle: Wood turtles are protected by Connecticut's threatened and endangered species legislation and **cannot** be injured, killed, or retained as a pet. If you find a wood turtle move the turtle to a safe location away from any construction activity in the direction that the turtle was heading. Pick up the turtle by its shell (carapace) between the front and hind legs. Be sure to hold the turtle closer to their hind legs as they can reach over and bite if your hands are too close to the head. The turtle may hiss and should retract into its shell.

Who to contact: Please report any finds and relocation of wood turtle immediately to **Dean Gustafson of All-Points Technology Corp., P.C. at (860) 984-9515.**