



PRELIMINARY USFWS & CTDEEP COMPLIANCE DETERMINATION

June 24, 2015

**Verizon Wireless
99 East River Drive
East Hartford, CT 06108**

APT Project No.: CT1412760

**Re: Proposed Wireless Telecommunications
Bethel West 2 Facility
15 Great Pasture Road
Danbury, Connecticut**

On behalf of Cellco Partnership d/b/a Verizon Wireless, All-Points Technology Corporation, P.C. ("APT") performed an initial evaluation with respect to possible federal- and state-listed, Threatened, Endangered and Special Concern¹ Species in order to determine if the proposed referenced telecommunications facility would result in a potential adverse effect to rare species. This consultation was completed in accordance with FCC rules implementing the National Environmental Policy Act ("NEPA"), Section 7 of the Endangered Species Act through the U.S. Fish and Wildlife Service's ("USFWS") Information, Planning, and Conservation System ("IPaC")² and the Connecticut Endangered Species Act.

Subject Property and Project Description

The Subject Property consists of an approximately 12.63-acre industrially developed parcel consisting of a multi-tenant 83,734 square foot industrial building built in 1958. The majority of the Subject Property is dominated by the large industrial building, paved parking, loading and storage areas and a 2,912 square foot warehouse building. A large emergent marsh wetland system associated with the Sympaug Brook and Chestnut Brook is located along the west side of the Subject Property. The proposed Verizon Wireless Facility is located in the southwestern portion of the Subject Property in a gravel surfaced area currently used as a storage yard by one of the industrial tenants. Verizon Wireless proposes to install a 123-foot tall unguyed monopole tower and ground equipment enclosure within a 50-foot by 50-foot gravel compound area surrounded with an 8-foot tall chain link fence. A proposed ±20-foot wide access and utility easement would follow the existing paved drive off of Great Pasture Road in order to gain access and provide utilities to the proposed facility.

Federally-listed Species

Based on the results of the IPaC review, two federal-listed Threatened species are documented in the vicinity of the Subject Property, including bog turtle (*Clemmys muhlenbergii*) and northern long-eared bat (*Myotis septentrionalis*). As a result of this preliminary finding and in accordance with USFWS New England Field Office's Section 7 consultation policy, an evaluation of whether habitat supported by the Subject Property is suitable for bog turtle and northern long-eared bat and if the proposed project would result in a likely adverse effect to these species has been provided to USFWS for review. A summary of this evaluation is provided below with a copy of the complete USFWS Section 7 consultation report enclosed. A response from the USFWS is forthcoming and will be provided to the Connecticut Siting Council ("Council") upon receipt.

¹ Special Concern species are only associated with state-listed species

² IPaC Consultation Tracking Number: 05E1NE00-2015-SLI-0555, dated June 12, 2015

The proposed Verizon Wireless development would be located within an existing developed and disturbed upland area and would not result in an adverse impact to nearby wetlands or to mature vegetation. Therefore, no adverse effect to bog turtle, a wetland dependent species, would result from the proposed project. As noted on Sheet No. C-1 of the Project Site Plans, the proposed communications facility would not require the removal of trees. Therefore, no adverse effect on potential roosting habitat for northern long-eared bat would result from the proposed project.

State-listed Species

In addition, no known areas of listed species or significant natural communities are currently depicted on the most recent Connecticut Department of Energy and Environmental Protection's ("DEEP") Natural Diversity Data Base ("NDDB") Maps in the location of the proposed Verizon Wireless development. A copy of the NDDB map is enclosed. Notwithstanding, APT consulted with the DEEP regarding documented occurrences of state-listed Endangered, Threatened, and Special Concern species. DEEP responded in a June 19, 2015 letter stating that eastern box turtle (*Terrapene carolina carolina*) and wood turtle (*Glyptemys insculpta*) are located in the vicinity of the project site and protection measures should be implemented during construction to avoid potential harm to these species. A copy of the DEEP letter is enclosed.

ATP recommends a turtle protection program consisting 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. The attached turtle protection program satisfies protection measures recommended by the DEEP Wildlife Division and follows protocols developed from previous rare species consultations and state-approved protection plans for similar projects. With adherence to this turtle protection program, the proposed development at this property would not have an adverse effect on these turtle species.

Conclusion

Based on our review of publicly available information and consultation with DEEP, the proposed Verizon Wireless development would not result in an adverse effect to any federal- or state-listed Threatened, Endangered or Special Concern Species, including bog turtle, northern long-eared bat, eastern box turtle or wood turtle.

Sincerely,



Dean Gustafson
Senior Environmental Scientist

Enclosures

USFWS Section 7 Consultation Report



Section 7 Consultation

June 5, 2015

APT Project No.: CT1412760

**U.S. Fish and Wildlife Service
70 Commercial Street, Suite 300
Concord, NH 03301-5087**

**Attn: Maria E. Tur
(via Email: Maria_Tur@fws.gov)**

**Re: Proposed Verizon Wireless
Bethel West 2 Facility
123' Tall Monopole Tower
15 Great Pasture Road
Danbury, Fairfield County, CT
Lat: 41-22-58.813 Long: 73-25-19.811
EnSite No.: 24591**

On behalf of Cellco Partnership and its controlled affiliates doing business as Verizon Wireless, All-Points Technology Corporation, P.C. ("APT") performed an evaluation with respect to possible federally-listed, threatened or endangered species in order to determine if the proposed referenced communications facility would result in a potential adverse effect to federally-listed species. This consultation was completed in accordance with FCC rules implementing the National Environmental Policy Act ("NEPA") and Section 7 of the Endangered Species Act through the U.S. Fish and Wildlife Service's ("USFWS") Information, Planning, and Conservation System ("IPaC")¹ for a proposed telecommunications facility at the referenced Site. Refer to the enclosed Site Location Map, Aerial Photograph and Project Site Plans for information regarding the location of the facility and Subject Property and details regarding the proposed project. The Subject Property was inspected on April 10, 2015 during which time a wetland delineation and habitat evaluation were performed. A Wetland Inspection Report and photographs of the proposed facility location are enclosed.

Bog Turtle and Northern Long-eared Bat

Two federally-listed² threatened species is known to occur in the vicinity of the Subject Property documented as the bog turtle (*Clemmys muhlenbergii*) and northern long-eared bat (*Myotis septentrionalis*). Northern long-eared bat's range encompasses the entire State of Connecticut. A copy of the IPaC report is enclosed. As a result of this preliminary finding and in accordance with USFWS New England Field Office's Section 7 consultation policy, habitat supported by the Subject Property and an evaluation of whether it is suitable for bog turtle and northern long-eared bat is described below.

A review of the USFWS' Federally Listed Endangered and Threatened Species in Connecticut only lists the towns of Ridgefield and Danbury in Fairfield County as having the potential for bog turtle. The "Bog Turtle (*Clemmys muhlenbergii*), Northern Population, Recovery Plan" (M.W. Klemens, compiler, May 15, 2001) and Amphibians and Reptiles of Connecticut and Adjacent Regions (M.W. Klemens, 1993) identifies bog turtle habitat as "calcareous wet

¹ IPaC Consultation Tracking Number: 05E1NE00-2015-SLI-0555, dated June 12, 2015

² Listing under the federal Endangered Species Act

meadows, pastures, and fens, usually bordered by shrub and red-maple swamps... [that are] characterized by a continuous flow of water seeping through the saturated surface soil and [contain] an extremely diverse vegetational community” and “Bog Turtles inhabit small pockets of open-canopy habitat located within these diverse and dynamic wetland ecosystems.”

The northern long-eared bat is a medium-sized bat with a body length of 3 to 3.7 inches but a wingspan of 9 to 10 inches. Their fur color can be medium to dark brown on the back and tawny to pale-brown on the underside. As its name suggests, this bat is distinguished by its long ears, particularly as compared to other bats in its genus, *Myotis*. During the summer, northern long-eared bats roost singly or in colonies underneath bark, in cavities or in crevices of both live trees and snags (dead trees). Males and non-reproductive females may also roost in cooler places, like caves and mines. Northern long-eared bats seem to be flexible in selecting roosts, choosing roost trees based on suitability to retain bark or provide cavities or crevices. Suitable northern long-eared bat roosts are trees (live, dying, dead, or snag) with a diameter at breast height (“DBH”) of three inches or greater that exhibits any of the following characteristics: exfoliating bark, crevices, cavity, or cracks.³ Isolated trees are considered suitable habitat when they exhibit the characteristics of a suitable roost tree and are less than 1000 feet from the next nearest suitable roost tree within a woodlot, or wooded fencerow. This bat has also been found rarely roosting in structures, like barns and sheds. Loss or degradation of summer (forest) habitat is one of several management concerns for this rare species with the principal concern being loss from white-nose syndrome. Depending on type and timing of forest management activities, the potential exists for mortality and temporarily removal or degradation of roosting and foraging habitat.

To avoid killing or injuring northern long eared bat, the following conservation measures are to be adhered to under Interim 4(d) Rule (April 2, 2015) of the federal Endangered Species Act for this species:

- I. No activities are to occur within 0.25 mile of a known, occupied hibernacula⁴
- II. Avoid cutting or destroying of known, occupied roost trees during the pup season of June 1st to July 31st
- III. Avoid clear-cutting (or similar harvesting methods) within 0.25 mile of known, occupied roost trees during the pup season of June 1st to July 31st

However, under the “Project Resulting in Minimal Tree Removal⁵” subsection of Interim 4(d) Rule, incidental take of northern long eared bat resulting from a project where the cumulative acreage of trees to be removed is less than 1 acre and will not significantly change the overall nature and function of the local forest habitat may not be prohibited under Interim 4(d) Rule.

Subject Property and Project Description

The Subject Property consists of an approximately 12.63-acre industrially developed parcel consisting of a multi-tenant 83,734 square foot industrial building built in 1958. The majority of the Subject Property is dominated by the large industrial building, paved parking, loading and storage areas and a 2,912 square foot warehouse building. A large emergent marsh wetland system associated with the Sympaug Brook and Chestnut Brook is located along the west side of the Subject Property. The proposed Verizon Wireless Facility is located in the southwestern portion of the Subject Property in a gravel surfaced area currently used as a storage yard by one of the industrial tenants.

³ US Fish and Wildlife Service. Northern Long-Eared Bat Interim Conference and Planning Guides, USFWS Regions 2, 3, 4, 5, & 6. January 6, 2014. 67 pp.

⁴ Locations of hibernacula are identified by Connecticut Department of Energy and Environmental Protection’s (“DEEP”) Natural Diversity Data Base (“CT NDDB”) during the state rare species consultation process

⁵ Interim 4(d) Rule defines “minimal tree removal” as follows: many activities that involve cutting or removal of individual or limited numbers of trees do not significantly change the overall nature and function of the local forested habitat. Some of these activities include firewood cutting, shelterbelt renovation, removal of diseased trees, tree removal for other small projects (i.e., culvert replacement), habitat restoration for fish and wildlife conservation, and backyard landscaping.

With respect to the term “minimal,” USFWS limits the effect to an impact of one acre of contiguous habitat or one acre in total within a larger tract, whether that larger tract is entirely forested or a mixture of forested and non-forested cover types. Tract may be further defined as the property under the control of the project proponent or ownership.

Verizon Wireless proposes to install a 123-foot tall unguyed monopole tower and ground equipment enclosure within a 50-foot by 50-foot gravel compound area surrounded with an 8-foot tall chain link fence. A proposed ±20-foot wide access and utility easement would follow the existing paved drive off of Great Pasture Road in order to gain access and provide utilities to the proposed facility.

Habitat Impact Analysis

The proposed Verizon Wireless development would be located within an existing developed and disturbed upland area and would not result in an adverse impact to nearby wetlands or to mature vegetation. Therefore, no adverse effect to bog turtle, a wetland dependent species, would result from the proposed project. In addition with the proposed communications facility located within an existing cleared storage yard, no trees will be removed. Refer to Sheet No. C-1 of the enclosed Project Site Plans providing details of the proposed development area. Therefore, no adverse effect on potential roosting habitat for northern long-eared bat would result from the proposed project.

Although a complete evaluation of the proposed tower's potential impact to migratory birds has not been performed, this tower appears to be generally compliant with the USFWS 2013 *Revised Voluntary Guidelines for Communication Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning*: this tower would be less than 200 feet tall (structure is 123 feet tall) and no guy wires or lighting are required. In addition, due to the project's location within the confines of an existing cleared storage yard on an industrially developed property, no tree clearing would be required. Therefore, the proposed construction activities are not anticipated to result in significant disturbance to breeding birds protected by the Migratory Bird Treaty Act ("MBTA").

Therefore, the proposed Verizon Wireless development would not result in an adverse effect to any federal threatened or endangered species, including bog turtle and northern long-eared bat, or migratory bird species protected under the MBTA.

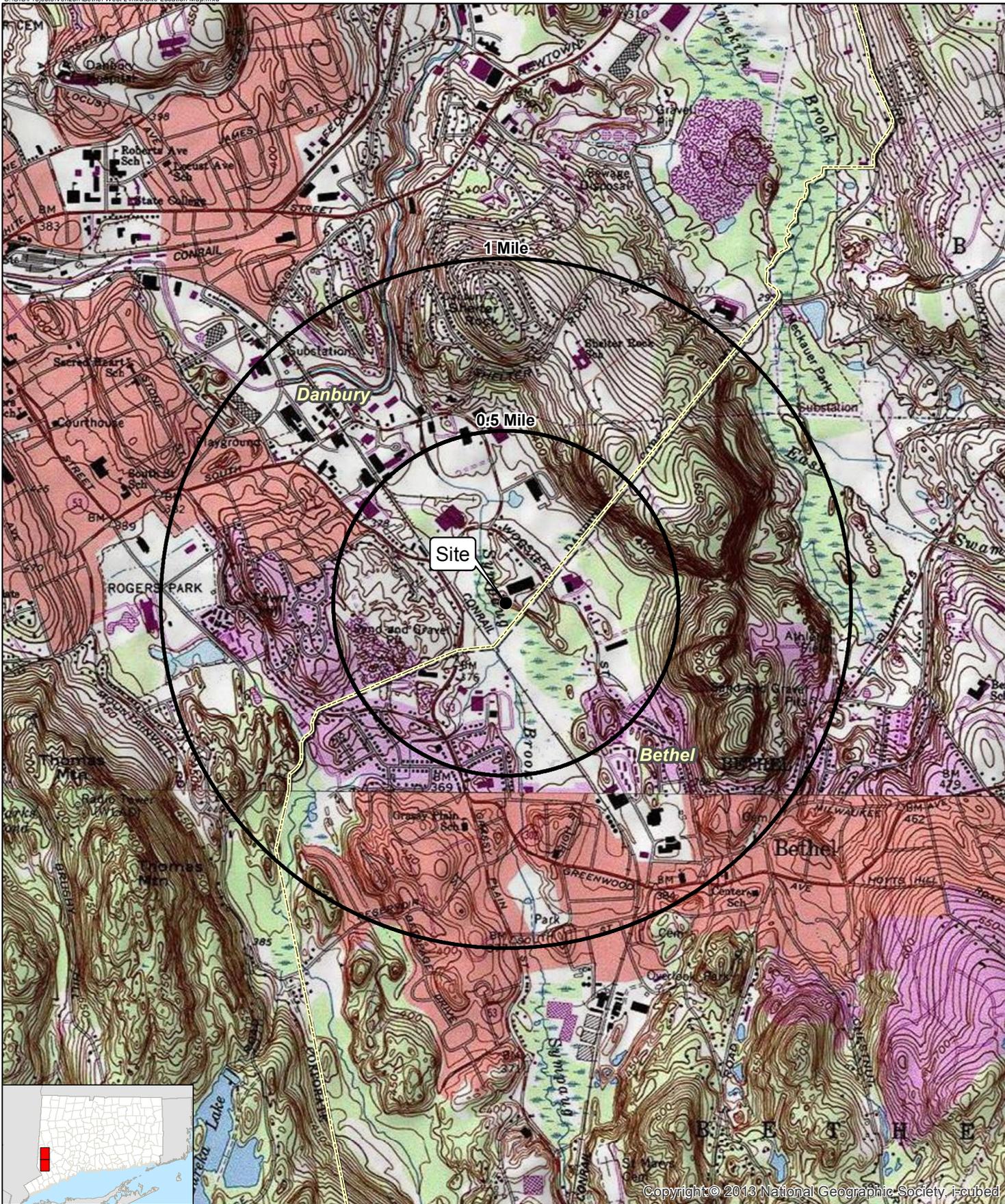
Sincerely,



Dean Gustafson
Senior Environmental Scientist

Enclosures

Site Location Map and Aerial Photograph

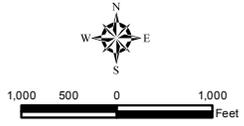


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Legend

- Site
- ▭ Municipal Boundary

Map Notes:
 Base Map Source: USGS 7.5 Minute Topographic Quadrangle Maps, Bethel and Danbury, CT (1984)
 Site located on the Danbury, CT Quadrangle
 Map Scale: 1:24,000
 Map Date: June 2015



USGS Topographic Site Location Map

Proposed Wireless Telecommunications Facility
 Bethel West 2 CT
 15 Great Pasture Road
 Danbury, Connecticut





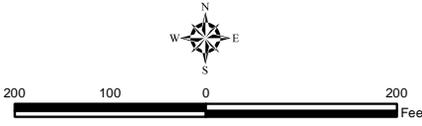
Legend

- Proposed 123' Monopole Tower
- Proposed Facility Layout
- Subject Property
- Approximate Parcel Boundary (CTDEEP GIS)
- Natural Diversity Database (NDDB; 12/2014)
- Existing CTDEEP Dig Restricted Area

Aerial Photograph Map

Proposed Wireless Telecommunications Facility
 Bethel West 2 CT
 15 Great Pasture Road
 Danbury, Connecticut

Map Notes:
 Base Map Source: 2012 Aerial Photograph (CTECO)
 Map Scale: 1:2,400
 Map Date: June 2015



Project Site Plans

Cellco Partnership

d.b.a. **verizon** wireless

WIRELESS COMMUNICATIONS FACILITY

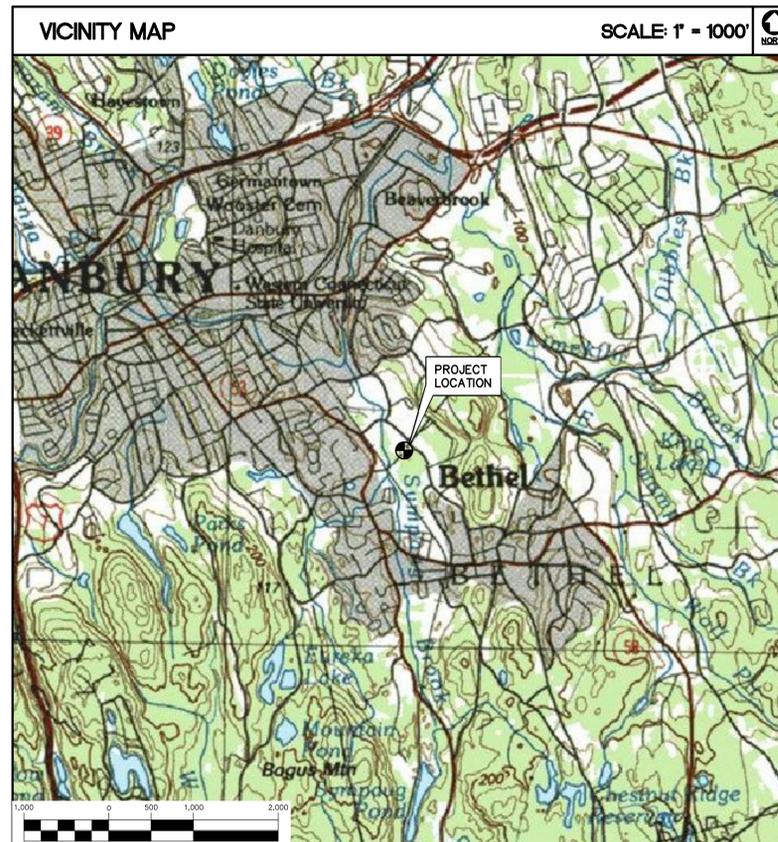
BETHEL W2

15 GREAT PASTURE ROAD
DANBURY, CT 06810

SITE DIRECTIONS			
FROM:	99 EAST RIVER DRIVE EAST HARTFORD, CONNECTICUT	TO:	15 GREAT PASTURE ROAD DANBURY, CONNECTICUT
1.	Head NORTHEAST on E RIVER DR toward DARLIN ST	0.3 mi.	
2.	Turn LEFT to stay on E RIVER DR	0.08 mi	
3.	Take the 1st LEFT onto CONNECTICUT BLVD	0.1 mi.	
4.	Turn LEFT to merge onto I-84	54.2 mi	
5.	Merge onto NEWTOWN RD	1.7 mi.	
6.	Turn LEFT onto OLD SHELTER ROCK RD	0.6 mi.	
7.	OLD SHELTER RD becomes CROSS ST	0.2 mi.	
8.	Turn LEFT onto SHELTER ROCK RD	0.04 mi.	
9.	Turn SLIGHT RIGHT onto SHELTER ROCK LN	0.4 mi.	
10.	Turn LEFT onto GREAT PASTURE RD	0.2 mi.	

GENERAL NOTES
1. PROPOSED ANTENNA LOCATIONS AND HEIGHTS PROVIDED BY CELCO PARTNERSHIP.

SITE INFORMATION
THE SCOPE OF WORK SHALL INCLUDE:
1. THE CONSTRUCTION OF A 50'x50' FENCED WIRELESS COMMUNICATIONS COMPOUND.
2. A TOTAL OF UP TO TWELVE (12) DIRECTIONAL PANEL ANTENNAS ARE PROPOSED TO BE MOUNTED AT A CENTERLINE ELEVATION OF 120'-0"± AGL ON A 120'-0"± PROPOSED STEEL MONOPOLE TOWER.
3. POWER AND TELCO UTILITIES SHALL BE ROUTED UNDERGROUND EXISTING UTILITY DEMARCS LOCATED ON OR ADJACENT TO THE SUBJECT PROPERTY, TO THE PROPOSED UTILITY BACKBOARD LOCATED ADJACENT TO THE PROPOSED FENCED COMPOUND. FINAL DEMARC LOCATION AND UTILITY ROUTING TO PROPOSED BACKBOARD WILL BE VERIFIED/DETERMINED BY LOCAL UTILITY COMPANIES. UTILITIES WILL BE ROUTED UNDERGROUND FROM UTILITY BACKBOARD TO THE PROPOSED NOMINAL 12'x26' WIRELESS EQUIPMENT SHELTER LOCATED WITHIN FENCED COMPOUND AREA.
4. FINAL DESIGN FOR TOWER AND ANTENNA MOUNTS SHALL BE INCLUDED IN THE D&M PLANS.
5. THE PROPOSED WIRELESS FACILITY INSTALLATION WILL BE DESIGNED IN ACCORDANCE WITH THE 2003 INTERNATIONAL BUILDING CODE AS MODIFIED BY THE 2009 CONNECTICUT SUPPLEMENT.
6. THERE WILL NOT BE ANY LIGHTING UNLESS REQUIRED BY THE FCC OR THE FAA.
7. THERE WILL NOT BE ANY SIGNS OR ADVERTISING ON THE ANTENNAS OR EQUIPMENT.



PROJECT SUMMARY	
SITE NAME:	BETHEL W2
SITE ADDRESS:	15 GREAT PASTURE ROAD DANBURY, CT 06810
PROPERTY OWNER:	EPPOLITI INDUSTRIAL REALTY INC. 37 DANBURY ROAD #203 RIDGEFIELD, CT 06877
LESSEE/TENANT:	CELCO PARTNERSHIP d.b.a. VERIZON WIRELESS 99 EAST RIVER DRIVE EAST HARTFORD, CT 06108
VERIZON SITE ACQUISITION CONTACT:	ALEKSEY TYURIN CELLCO PARTNERSHIP (860) 803-8213
LEGAL/REGULATORY COUNSEL:	KENNETH C. BALDWIN, ESQ. ROBINSON & COLE (860) 257-8345
TOWER COORDINATES:	LATITUDE: 41°-22'-58.813" LONGITUDE: 73°-25'-19.811" PROPOSED GROUND ELEVATION: 387.1'± A.M.S.L. SITE COORDINATES AND GROUND ELEVATION AND REFERENCED FROM FAA-1A SURVEY CERTIFICATION AS PREPARED BY MARTINEZ COUCH AND ASSOCIATES LLC, DATED FEBRUARY 17, 2015.

SHEET INDEX		
SHT. NO.	DESCRIPTION	REV. NO.
T-1	TITLE SHEET	2
C-1	SITE LOCATION PLAN	2
C-2	COMPOUND PLAN, ELEVATION AND ANTENNA MOUNTING CONFIGURATION	2

REV.	DATE	BY	CHK'D BY	DESCRIPTION
2	04/02/15	HHR	DND	REVISED CSC TECH REPORT PLANS - UPDATED FOR FAA 1-A CERTIFICATION
1	02/23/15	KAW	DND	CSC TECH REPORT PLANS
0	02/12/15	KAW	DND	CSC TECH REPORT PLANS - ISSUED FOR CLIENT REVIEW

PROFESSIONAL ENGINEER SEAL

Cellco Partnership
d.b.a. **verizon** wireless

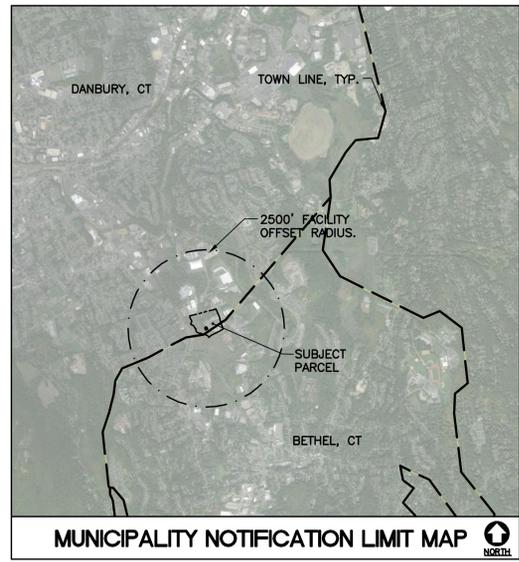
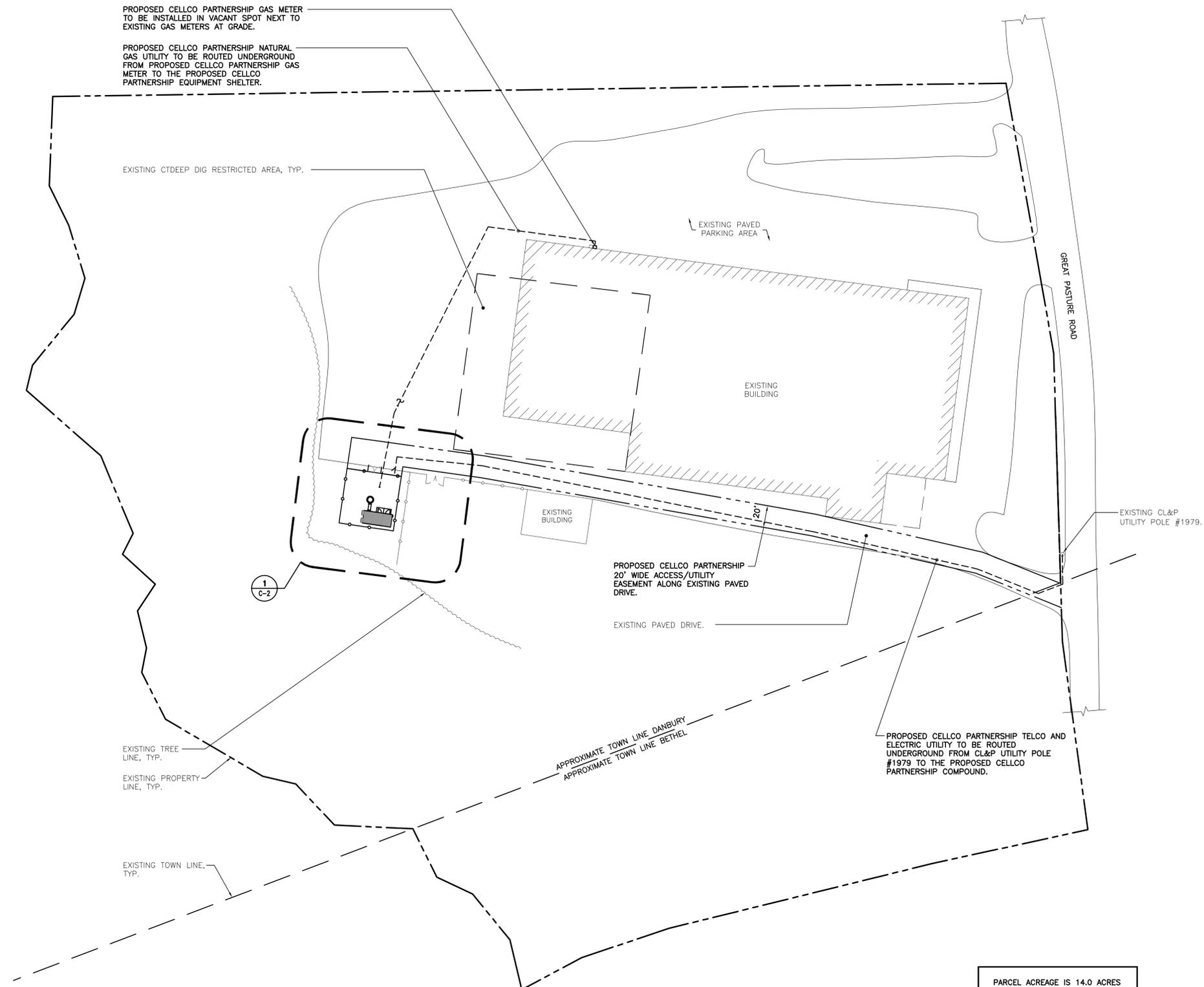
CEN TEK engineering
Centered on Solutions™
(203) 498-0380
(203) 498-3897 Fax
652 North Branford Road
Branford, CT 06405
www.CenTekEng.com

Cellco Partnership d/b/a Verizon Wireless
WIRELESS COMMUNICATIONS FACILITY
BETHEL W2
15 GREAT PASTURE ROAD
DANBURY, CT 06810

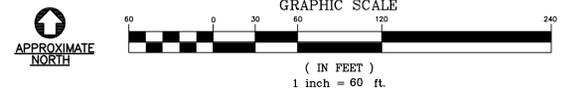
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SCALE: AS NOTED
JOB NO. 14216.000

TITLE SHEET

T-1
Sheet No. 1 of 3



1
C-1
SITE LOCATION PLAN
SCALE: 1"=60'



REV.	DATE	BY	CHK'D BY	DESCRIPTION
2	04/02/15	HHR	DND	REVISED CSC TECH REPORT PLANS - UPDATED FOR TIA 1-A CERTIFICATION
1	02/23/15	KAW	DND	CSC TECH REPORT PLANS
0	02/12/15	KAW	DND	CSC TECH REPORT PLANS - ISSUED FOR CLIENT REVIEW

PROFESSIONAL ENGINEER SEAL

Cellco Partnership
d.b.a. Verizon Wireless

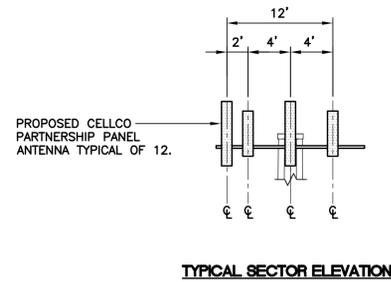
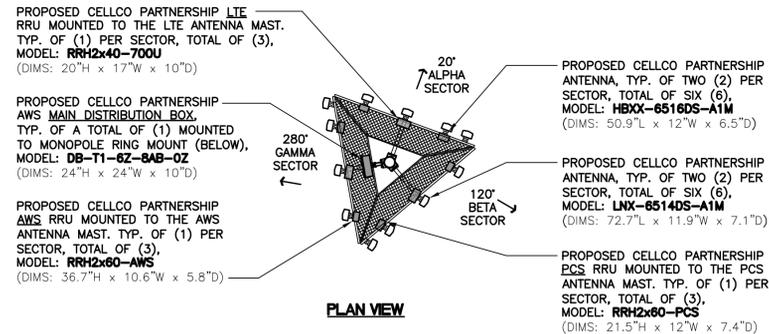
CEN TEK engineering
Centered on Solutions™
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(203) 498-3397 Fax
632 North Branford Road
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www.CenTekEng.com

Cellco Partnership d/b/a Verizon Wireless
WIRELESS COMMUNICATIONS FACILITY
BETHEL W2
15 GREAT PASTURE ROAD
DANBURY, CT 06810

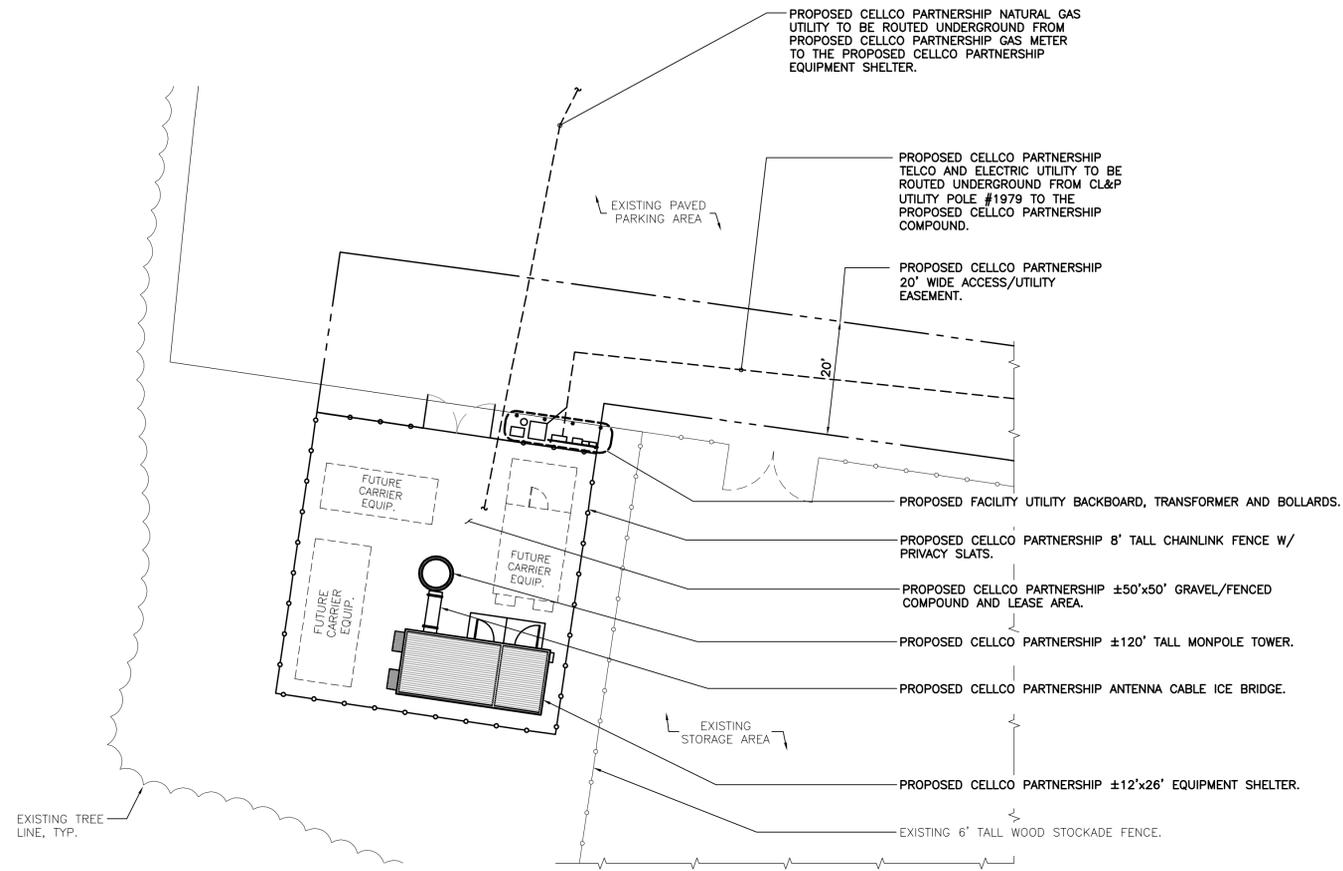
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JOB NO. 14216.000

SITE LOCATION PLAN

C-1
Sheet No. 2 of 3

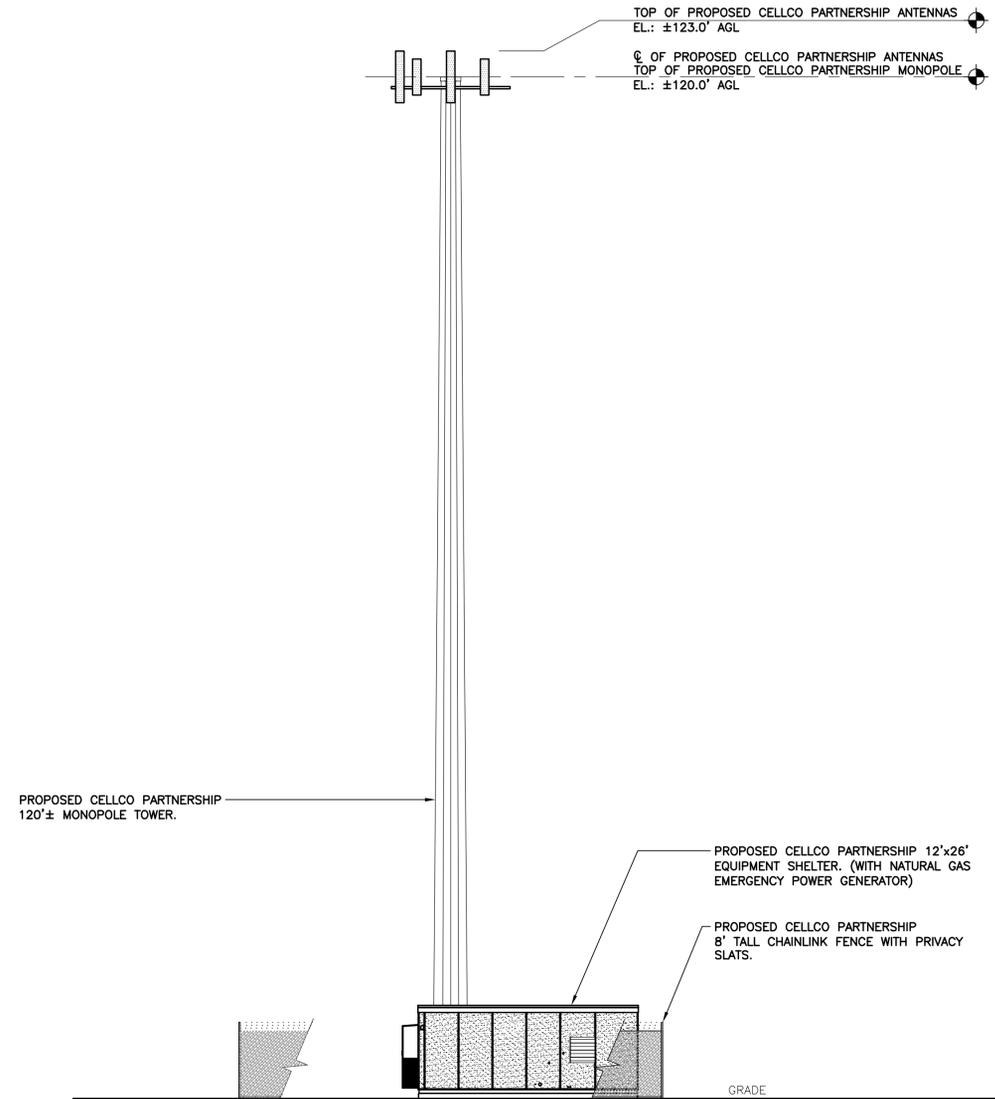
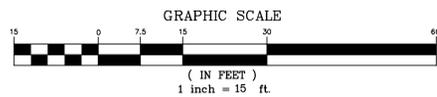


3 ANTENNA MOUNTING CONFIGURATION
C-2 SCALE: 1/8" = 1'

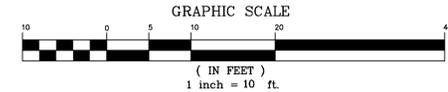


1 COMPOUND PLAN
C-2 SCALE: 1" = 15'

2 C-2



2 SOUTH ELEVATION
C-2 SCALE: 1" = 10'



REV.	DATE	DESCRIPTION
2	04/02/15	HMR
1	02/23/15	KAW
0	02/12/15	KAW

PROFESSIONAL ENGINEER SEAL

Cellco Partnership
d.b.a. Verizon Wireless

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(203) 498-3897 Fax
632 North Branford Road
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www.CenTelEng.com

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WIRELESS COMMUNICATIONS FACILITY
BETHEL W2
15 GREAT PASTURE ROAD
DANBURY, CT 06810

DATE: 02/11/15
SCALE: AS NOTED
JOB NO. 14216.000
COMPOUND PLAN,
ELEVATION AND
ANTENNA
MOUNTING CONFIG.

Wetland Inspection Report



WETLAND INSPECTION

April 19, 2015

APT Project No.: CT1412760

Prepared For: Verizon Wireless
99 East River Drive
East Hartford, CT 06108
Attn: Aleksey Tyurin

Verizon Wireless Site Name: Bethel W2

Site Address: 15 Great Pasture Road
Danbury, Connecticut

Date(s) of Investigation: 4/10/2015

Field Conditions: **Weather:** cloudy, mid 40's
Soil Moisture: moist

Wetland/Watercourse Delineation Methodology*:

- Connecticut Inland Wetlands and Watercourses
- Connecticut Tidal Wetlands
- Massachusetts Wetlands
- U.S. Army Corps of Engineers

The wetlands inspection was performed by[†]:

Dean Gustafson, Professional Soil Scientist

Enclosures: Wetland Delineation Field Form & Wetland Inspection Map

This report is provided as a brief summary of findings from APT's wetland investigation of the referenced study area that consists of proposed development activities and areas generally within 200 feet.[‡] If applicable, APT is available to provide a more comprehensive wetland impact analysis upon receipt of site plans depicting the proposed development activities and surveyed location of identified wetland and watercourse resources.

* Wetlands and watercourses were delineated in accordance with applicable local, state and federal statutes, regulations and guidance.

† All established wetlands boundary lines are subject to change until officially adopted by local, state, or federal regulatory agencies.

‡ APT has relied upon the accuracy of information provided by Verizon Wireless and its contractors regarding proposed lease area and access road/utility easement locations for identifying wetlands and watercourses within the study area.

Attachments

- Wetland Delineation Field Form
- Wetland Inspection Map

Wetland Delineation Field Form

Wetland I.D.:	Wetland 1	
Flag #'s:	WF 1-01 to 1-20	
Flag Location Method:	Site Sketch <input checked="" type="checkbox"/>	GPS (sub-meter) located <input checked="" type="checkbox"/>

WETLAND HYDROLOGY:

NONTIDAL

Intermittently Flooded <input type="checkbox"/>	Artificially Flooded <input type="checkbox"/>	Permanently Flooded <input type="checkbox"/>
Semipermanently Flooded <input type="checkbox"/>	Seasonally Flooded <input checked="" type="checkbox"/>	Temporarily Flooded <input type="checkbox"/>
Permanently Saturated <input type="checkbox"/>	Seasonally Saturated – seepage <input type="checkbox"/>	Seasonally Saturated - perched <input type="checkbox"/>
Comments: None		

TIDAL

Subtidal <input type="checkbox"/>	Regularly Flooded <input type="checkbox"/>	Irregularly Flooded <input type="checkbox"/>
Irregularly Flooded <input type="checkbox"/>		
Comments: None		

WETLAND TYPE:

SYSTEM:

Estuarine <input type="checkbox"/>	Riverine <input type="checkbox"/>	Palustrine <input checked="" type="checkbox"/>
Lacustrine <input type="checkbox"/>	Marine <input type="checkbox"/>	
Comments: None		

CLASS:

Emergent <input checked="" type="checkbox"/>	Scrub-shrub <input type="checkbox"/>	Forested <input type="checkbox"/>
Open Water <input type="checkbox"/>	Disturbed <input type="checkbox"/>	Wet Meadow <input type="checkbox"/>
Comments: wetland boundary defined by steep fill embankment		

WATERCOURSE TYPE:

Perennial <input checked="" type="checkbox"/>	Intermittent <input type="checkbox"/>	Tidal <input type="checkbox"/>
Watercourse Name: Sympaug River		
Comments: Beaver activity observed		

Wetland Delineation Field Form (Cont.)

SPECIAL AQUATIC HABITAT:

Vernal Pool Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Potential <input type="checkbox"/>	Other <input type="checkbox"/>
Comments: None	

SOILS:

Are field identified soils consistent with NRCS mapped soils?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If no, describe field identified soils		

DOMINANT PLANTS:

Common Reed* (<i>Phragmites australis</i>)	
Broad-Leaf Cattail (<i>Typha latifolia</i>)	
Skunk Cabbage (<i>Symplocarpus foetidus</i>)	
Reed Canarygrass* (<i>Phalaris arundinacea</i>)	
Sedge Spp.	

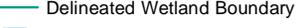
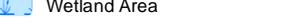
* denotes Connecticut Invasive Plants Council invasive species

GENERAL COMMENTS:

Northern Spring Peepers chorusing from wetland interior.
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Legend

-  Proposed 123' Monopole Tower
-  Proposed Facility Layout
-  Subject Property
-  Existing CTDEEP Dig Restricted Area
-  Wetland Flag
-  Delineated Wetland Boundary
-  Wetland Area



Map Notes:
 Base Map Source: 2012 Aerial Photograph (CTECO)
 Map Scale: 1 inch = 200 feet
 Map Date: June 2015

Wetland Inspection Map

Proposed Wireless Telecommunications Facility
 Bethel West 2 CT
 15 Great Pasture Road
 Danbury, Connecticut



Site Photographs



Photo 1. Overview photo from the proposed tower location facing southeast.



Photo 2. Overview photo from the proposed tower location facing southwest.



Photo 3. Overview photo from the proposed tower location facing northwest.



Photo 4. Overview photo from the proposed tower location facing northeast.



Photo 5. Overview photo of the proposed tower location facing west.



Photo 6. Overview photo of the proposed tower location facing east.



Photo 7. Overview photo of the proposed tower location facing south.



Photo 8. Overview photo of the area to the north of the proposed tower location facing north.



Photo 9. Overview photo of the proposed access road facing east.



Photo 10. Overview photo of the proposed access road facing west.

USFWS IPaC Threatened and Endangered Species Report



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 COMMERCIAL STREET, SUITE 300
CONCORD, NH 3301
PHONE: (603)223-2541 FAX: (603)223-0104
URL: www.fws.gov/newengland

Consultation Code: 05E1NE00-2015-SLI-0555

June 12, 2015

Event Code: 05E1NE00-2015-E-00911

Project Name: Verizon Wireless Bethel West 2

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: Verizon Wireless Bethel West 2

Official Species List

Provided by:

New England Ecological Services Field Office
70 COMMERCIAL STREET, SUITE 300
CONCORD, NH 3301
(603) 223-2541
<http://www.fws.gov/newengland>

Consultation Code: 05E1NE00-2015-SLI-0555

Event Code: 05E1NE00-2015-E-00911

Project Type: COMMUNICATIONS TOWER

Project Name: Verizon Wireless Bethel West 2

Project Description: Site Address: 15 Great Pasture Road, Danbury, CT. A new 123' tall telecommunications facility with 50' x 50' compound is proposed in an existing developed gravel storage yard on an industrially developed property. Access will be from an existing paved access that serves the industrial development.

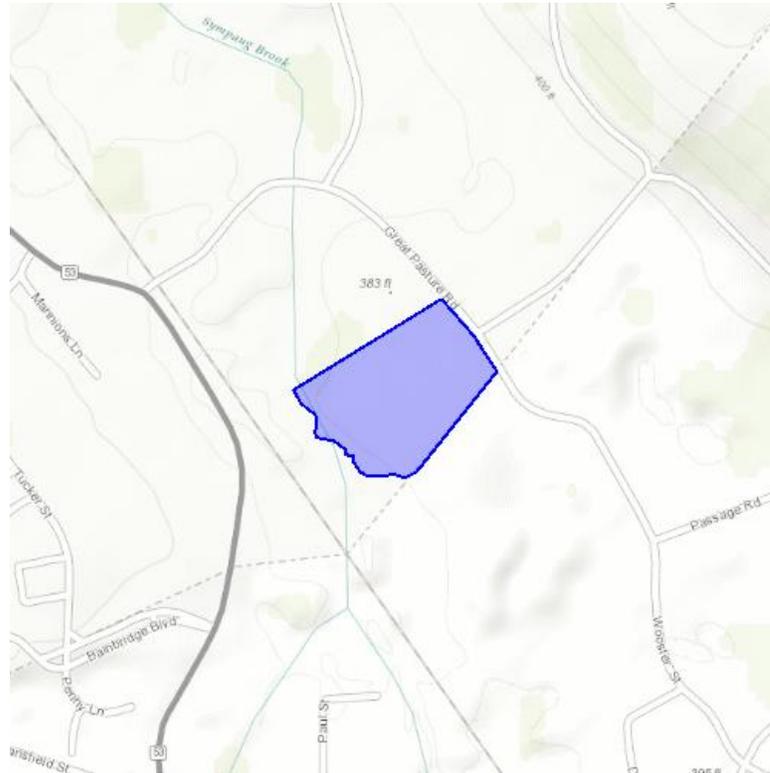
Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.



United States Department of Interior
Fish and Wildlife Service

Project name: Verizon Wireless Bethel West 2

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-73.4200980325738 41.38370366655044, -73.42154533475315 41.38234605201704, -73.42177705190637 41.382257361514164, -73.42195397311411 41.38229583057408, -73.42244719296147 41.382272048705325, -73.42258531561389 41.382341423184485, -73.42269899911865 41.38246909500335, -73.42269362366315 41.38254587217272, -73.42283996450203 41.38256971228718, -73.42284405808213 41.38262949750024, -73.42307002959407 41.38275383155569, -73.42339150454302 41.382800518644494, -73.42341512555379 41.382864215103645, -73.42338486255657 41.383030622599925, -73.42341302560497 41.38311453975896, -73.42366890383636 41.38327136787202, -73.42381077101159 41.383466852943684, -73.42109913259533 41.38471017649332, -73.4205092034444 41.38418656417184, -73.4200980325738 41.38370366655044)))

Project Counties: Fairfield, CT



United States Department of Interior
Fish and Wildlife Service

Project name: Verizon Wireless Bethel West 2

Endangered Species Act Species List

There are a total of 2 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Mammals	Status	Has Critical Habitat	Condition(s)
Northern long-eared Bat (<i>Myotis septentrionalis</i>)	Threatened		
Reptiles			
Bog Turtle (<i>Clemmys muhlenbergii</i>) Population: northern	Threatened		



United States Department of Interior
Fish and Wildlife Service

Project name: Verizon Wireless Bethel West 2

Critical habitats that lie within your project area

There are no critical habitats within your project area.

CTDEEP NDDDB Map



Legend

- Proposed 123' Monopole Tower
- Proposed Facility Layout
- Subject Property
- Approximate Parcel Boundary (CTDEEP GIS)

- Natural Diversity Database (NDBB; 12/2014)
- Existing CTDEEP Dig Restricted Area



NDBB Map

Proposed Wireless Telecommunications Facility
 Bethel West 2 CT
 15 Great Pasture Road
 Danbury, Connecticut

Map Notes:
 Base Map Source: 2012 Aerial Photograph (CTECO)
 Map Scale: 1:2,400
 Map Date: June 2015



CTDEEP June 19, 2015 Letter



Connecticut Department of

**ENERGY &
ENVIRONMENTAL
PROTECTION**

June 19, 2015

Mr. Dean Gustafson
All-Points Technology Corporation, P.C.
3 Saddlebrook Drive
Killingworth, CT 06419
dgustafson@allpointstech.com

Project: Proposed Construction of a 123 ft. Monopole Telecommunications Tower to be Located in a Gravel-Surface Storage Area of an Industrially Developed Property at Bethel West 2 Located at 15 Great Pasture Road in Danbury , Connecticut
NDDDB Determination No.: 201504295

Dear Dean,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Construction of a 123 ft. Monopole Telecommunications Tower to be Located in a Gravel-Surface Storage Area of an Industrially Developed Property at Bethel West 2 Located at 15 Great Pasture Road in Danbury. According to our records we have known extant populations of State Special Concern *Terrapene carolina carolina* (box turtle) and *Glyptemys insculpta* (wood turtle) in the vicinity of the project site.

Eastern box turtle (*Terrapene carolina carolina*) Protection Status: Species of Special Concern
Eastern Box Turtles require old field and deciduous forest habitats, which can include power lines and logged woodlands. They are often found near small streams and ponds. The adults are completely terrestrial but the young may be semiaquatic, and hibernate on land by digging down in the soil from October to April. They have an extremely small home range and can usually be found in the same area year after year. Eastern Box Turtles have been negatively impacted by the loss of suitable habitat. Some turtles may be killed directly by construction activities, but many more are lost when important habitat areas for shelter, feeding, hibernation, or nesting are destroyed. As remaining habitat is fragmented into smaller pieces, turtle populations can become small and isolated.

Wood turtle (*Glyptemys insculpta*) Protection Status: Species of Special Concern
Wood turtles require riparian habitats bordered by floodplain, woodland or meadows. They hibernate in the banks of the river in submerged tree roots. Their summer habitat includes pastures, old fields, woodlands, power-line cuts and railroad beds bordering or adjacent to streams and rivers. This species has been negatively impacted by the loss of suitable habitat.

Recommendation: Precautions to protect eastern box and wood turtles and their habitats should be addressed. The following guidelines should be met to avoid negative impact to these species:

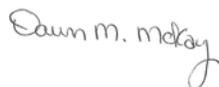
- Workers should be apprised of the possible presence of turtles, and provided a description of the species
(http://www.ct.gov/dep/cwp/view.asp?a=2723&q=473472&depNav_GID=1655);
- A sweep of the work area should be conducted each day to look for turtles;
- Any turtles that are discovered should be moved, unharmed, to an area immediately outside of harm's way, and position in the same direction that it was walking;
- No vehicles or heavy machinery should be parked in any turtle habitat;
- Work conducted during early morning and evening hours should occur with special care not to harm basking or foraging individuals.

If these protection strategies are followed then the proposed activities will lessen the impact on the wood and eastern box turtle. I have attached fact sheets for both species. This determination is good for one year. Please re-submit an NDDDB Request for Review if the scope of work changes or if work has not begun on this project by June 19, 2016.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov . Thank you for consulting the Natural Diversity Data Base. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEEP for the proposed site.

Sincerely,



Dawn M. McKay
Environmental Analyst 3

WILDLIFE IN CONNECTICUT

STATE SPECIES OF SPECIAL CONCERN

Wood Turtle

Glyptemys insculpta

Background

Wood turtles may be found throughout Connecticut, but they have become increasingly rare due to their complex habitat needs. Wood turtles also have become more scarce in Fairfield County due to the fragmentation of suitable habitat by urban development.

Range

Wood turtles can be found across the northeastern United States into parts of Canada. They range from Nova Scotia through New England, south into northern Virginia, and west through the Great Lakes region into Minnesota.

Description

The scientific name of the wood turtle, *Glyptemys insculpta*, refers to the deeply sculptured or chiseled pattern found on the carapace (top shell). This part of the shell is dark brown or black and may have an array of faint yellow lines radiating from the center of each chiseled, pyramid-like segment due to tannins and minerals accumulating between ridges. These segments of the carapace, as well as those of the plastron (bottom shell), are called scutes. The carapace also is keeled, with a noticeable ridge running from front to back. The plastron is yellow with large dark blotches in the outer corners of each scute. The black or dark brown head and upper limbs are contrasted by brighter pigments ranging from red and orange to a pale yellow on the throat and limb undersides. Orange hues are most typical for New England's wood turtles. The hind feet are only slightly webbed, and the tail is long and thick at the base. Adults weigh approximately 1.5 to 2.5 pounds and reach a length of 5 to 9 inches.



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Habitat and Diet

Wood turtles use aquatic and terrestrial habitats at different times of the year. Their habitats include rivers and large streams, riparian forests (adjacent to rivers), wetlands, hayfields, and other early successional habitats. Terrestrial habitat that is usually within 1,000 feet of a suitable stream or river is most likely used. Preferred stream conditions include moderate flow, sandy or gravelly bottoms, and muddy banks.

Wood turtles are omnivorous and opportunistic. They are not picky eaters and will readily consume slugs, worms, tadpoles, insects, algae, wild fruits, leaves, grass, moss, and carrion.

Life History

From late spring to early fall, wood turtles can be found roaming their aquatic or terrestrial habitats. However, once temperatures drop in autumn, the turtles retreat to rivers and large streams for hibernation. The winter

is spent underwater, often tucked away below undercut riverbanks within exposed tree roots. Dissolved oxygen is extracted from the water, allowing the turtle to remain submerged entirely until the arrival of spring. Once warmer weather sets in, the turtles will become increasingly more active, eventually leaving the water to begin foraging for food and searching for mates. Travel up or down stream is most likely, as turtles seldom stray very far from their riparian habitats.

Females nest in spring to early summer, depositing anywhere from 4 to 12 eggs into a nest dug out of soft soil, typically in sandy deposits along stream banks or other areas of loose soil. The eggs hatch in late summer or fall and the young turtles may either emerge or remain in the nest for winter hibernation. As soon as the young turtles hatch, they are on their own and receive no care from the adults.

Turtle eggs and hatchlings are heavily preyed upon by a wide variety of predators, ranging from raccoons to birds and snakes. High rates of nest predation and hatchling mortality, paired with the lengthy amount of time it takes for wood turtles to reach sexual maturity, present a challenge to maintaining sustainable populations. Wood turtles live upwards of 40 to 60 years, possibly more.

Conservation Concerns

Loss and fragmentation of habitat are the greatest threats to wood turtles. Many remaining populations in Connecticut are low in numbers and isolated from one another by human-dominated landscapes. Turtles forced to venture farther and farther from appropriate habitat

to find mates and nesting sites are more likely to be run over by cars, attacked by predators, or collected by people as pets.

Other sources of mortality include entanglements in litter and debris left behind by people, as well as strikes from mowing equipment used to maintain hayfields and other early successional habitats.

The wood turtle is imperiled throughout a large portion of its range and was placed under international trade regulatory protection through the Convention on International Trade in Endangered Species (CITES) in 1992. Wood turtles also have been included on the International Union for Conservation of Nature's (IUCN) Red List as a vulnerable species since 1996. They are listed as a species of special concern in Connecticut and protected by the Connecticut Endangered Species Act.

How You Can Help

- *Conserve riparian habitat. Maintaining a buffer strip of natural vegetation (minimum of 100 feet) along the banks of streams and rivers will protect wood turtle habitat and also help improve the water quality of the stream system. Stream banks that are manicured (cleared of natural shrubby and herbaceous vegetation) or armored by rip rap or stone walls will not be used by wood turtles or most other wildlife species.*
- *Do not litter. Wood turtles and other wildlife may accidentally ingest or become entangled in garbage and die.*
- *Leave turtles in the wild. They should never be kept as pets. Whether collected singly or for the pet trade, turtles that are removed from the wild are no longer able to be a reproducing member of a population. Every turtle removed reduces the ability of the population to maintain itself.*
- *Never release a captive turtle into the wild. It probably would not survive, may not be native to the area, and could introduce diseases to wild populations.*
- *As you drive, watch out for turtles crossing the road. Turtles found crossing roads in June and July are often pregnant females. They should **not** be collected but can be helped on their way. Without creating a traffic hazard or compromising safety, drivers are encouraged to avoid running over turtles that are crossing roads. Also, still keeping safety precautions in mind, you may elect to pick up turtles from the road and move them onto the side in the direction they are headed. Never relocate a turtle to another area that is far from where you found it.*
- *Learn more about turtles and their conservation concerns, and educate others.*
- *If you see a wood turtle, leave it in the wild, take a photograph, record the location where it was seen, and contact the Connecticut Department of Environmental Protection (DEP) Wildlife Division at dep.wildlife@ct.gov, or call 860-424-3011 to report your observation.*



WILDLIFE IN CONNECTICUT

STATE SPECIES OF SPECIAL CONCERN

Eastern Box Turtle

Terrapene carolina carolina

Description

The eastern box turtle is probably the most familiar of the 8 species of turtles found in Connecticut's landscape. It is known for its high-domed carapace (top shell). The carapace has irregular yellow or orange blotches on a brown to black background that mimic sunlight dappling on the forest floor. The plastron (under shell) may be brown or black and may have an irregular pattern of cream or yellow. The length of the carapace usually ranges from 4.5 to 6.5 inches, but can measure up to 8 inches long. The shell is made up of a combination of scales and bones, and it includes the ribs and much of the backbone.

Each individual turtle has distinctive head markings. Males usually have red eyes and a concave plastron, while females have brown eyes and a flat plastron. Box turtles also have a horny beak, stout limbs, and feet that are webbed at the base. This turtle gets its name from its ability to completely withdraw into its shell, closing itself in with a hinged plastron. Box turtles are the only Connecticut turtle with this ability.

Range

Eastern box turtles are found throughout Connecticut, except at the highest elevations. They range from southeastern Maine to southeastern New York, west to central Illinois, and south to northern Florida.

Habitat and Diet

In Connecticut, this terrestrial turtle inhabits a variety of habitats, including woodlands, field edges, thickets, marshes, bogs, and stream banks. Typically, however, box turtles are found in well-drained forest bottomlands and open deciduous forests. They will use wetland areas at various times during the season. During the hottest part of a summer day, they will wander to find springs and seepages where they can burrow into the moist soil. Activity is restricted to mornings and evenings during summer, with little to no nighttime activity, except for egg-



laying females. Box turtles have a limited home range where they spend their entire life, ranging from 0.5 to 10 acres (usually less than 2 acres).

Box turtles are omnivorous and will feed on a variety of food items, including earthworms, slugs, snails, insects, frogs, toads, small snakes, carrion, leaves, grass, berries, fruits, and fungi.

Life History

From October to April, box turtles hibernate by burrowing into loose soil, decaying vegetation, and mud. They tend to hibernate in woodlands, on the edge of woodlands, and sometimes near closed canopy wetlands in the forest. Box turtles may return to the same place to hibernate year after year. As soon as they come out of hibernation, box turtles begin feeding and searching for mates.

The breeding season begins in April and may continue through fall. Box turtles usually do not breed until they are about 10 years old. This late maturity is a result of their long lifespan, which can range up to 50 to even over 100 years of age. The females do not have to mate every year to lay eggs as they can store sperm for up

to 4 years. In mid-May to late June, the females will travel from a few feet to more than a mile within their home range to find a location to dig a nest and lay their eggs. The 3 to 8 eggs are covered with dirt and left to be warmed by the sun. During this vulnerable time, skunks, foxes, snakes, crows, and raccoons often raid nests. Sometimes, entire nests are destroyed. If the eggs survive, they will hatch in late summer to early fall (about 2 months after being laid). If they hatch in the fall, the young turtles may spend the winter in the nest and come out the following spring.

As soon as the young turtles hatch, they are on their own and receive no care from the adults. This is a dangerous time for young box turtles because they do not develop the hinge for closing into their shell until they are about 4 to 5 years old. Until then, they cannot entirely retreat into their shells. Raccoons, skunks, foxes, dogs, and some birds will prey on young turtles.

Conservation Concerns

The eastern box turtle was once common throughout the state, mostly in the central Connecticut lowlands. However, its distribution is now spotty, although where found, turtles may be locally abundant. Because of the population decline in Connecticut, the box turtle was added to the state's List of Endangered, Threatened, and Special Concern Species when it was revised in 1998. It is currently listed as a species of special concern. The box turtle also is protected from international trade by the 1994 CITES treaty. It is of conservation concern in all the states where it occurs at its northeastern range limit, which includes southern New England and southeastern New York.

Many states have laws that protect box turtles and prohibit their collection. In Connecticut, eastern box turtles **cannot** be collected from the wild (DEP regulations 26-66-14A). Another regulation (DEP regulations 26-55-3D) "grandfathers" those who have a **box turtle collected before 1998**. This regulation limits possession to a single turtle collected before 1998. These

regulations provide some protection for the turtles, but not enough to combat some of the even bigger threats these animals face. The main threats in Connecticut (and other states) are loss and fragmentation of habitat due to deforestation and spreading suburban development; vehicle strikes on the busy roads that bisect the landscape; and indiscriminate (and now illegal) collection of individuals for pets.

Loss of habitat is probably the greatest threat to turtles. Some turtles may be killed directly by construction activities, but many more are lost when important habitat areas for shelter, feeding, hibernation, or nesting are destroyed. As remaining habitat is fragmented into smaller pieces, turtle populations can become small and isolated.

Adult box turtles are relatively free from predators due to their unique shells. The shell of a box turtle is extremely hard. However, the shell is not hard enough to survive being run over by a vehicle. Roads bisecting turtle habitat can seriously deplete the local population. Most vehicle fatalities are pregnant females searching for a nest site.

How You Can Help

- *Leave turtles in the wild. They should never be kept as pets. Whether collected singly or for the pet trade, turtles that are removed from the wild are no longer able to be a reproducing member of a population. Every turtle removed reduces the ability of the population to maintain itself.*
- *Never release a captive turtle into the wild. It probably would not survive, may not be native to the area, and could introduce diseases to wild populations.*
- *Do not disturb turtles nesting in yards or gardens.*
- *As you drive, watch out for turtles crossing the road. Turtles found crossing roads in June and July are often pregnant females and they should be helped on their way and not collected. Without creating a traffic hazard or compromising safety, drivers are encouraged to avoid running over turtles that are crossing roads. Also, still keeping safety precautions in mind, you may elect to pick up turtles from the road and move them onto the side they are headed. Never relocate a turtle to another area that is far from where you found it.*
- *Learn more about turtles and their conservation concerns. Spread the word to others on how they can help Connecticut's box turtle population.*



State of Connecticut
Department of Environmental Protection
Bureau of Natural Resources
Wildlife Division
www.ct.gov/dep



The production of this Endangered and Threatened Species Fact Sheet is made possible by donations to the Connecticut Endangered Species/Wildlife Income Tax Checkoff Fund.

Eastern Box Turtle and Wood Turtle Protection Program

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 satisfy requirements from the Connecticut Department of Energy & Environmental Protection ("CTDEEP") Wildlife Division and follow protocols developed from previous rare species consultations and state-approved protection plans. This protection plan is valid until June 19, 2016, one year from the date of CTDEEP's letter, 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 & Erosion and Sedimentation Controls

- a. Plastic netting used in a variety of erosion control products (i.e., erosion control blankets, fiber rolls [wattles], reinforced silt fence) has been found to entangle wildlife, including reptiles, amphibians, birds and small mammals. No permanent erosion control products or reinforced silt fence will be used on the Verizon Wireless project. Temporary erosion control products will use either erosion control blankets and fiber rolls composed of processed fibers mechanically bound together to form a continuous matrix (netless) or netting composed of planar woven natural biodegradable fiber to avoid/minimize wildlife entanglement.
- b. Installation of erosion and sedimentation controls (i.e., silt fencing), required for erosion control compliance and creation of a barrier to possible migrating/dispersing herpetofauna, shall be performed by the Contractor following clearing activities and prior to any earthwork. The Environmental Monitor will inspect the work zone area prior to and following erosion control barrier installation to ensure the area is free of to ensure the area is free of eastern box turtles and wood turtles and satisfactorily installed. The intent of the barrier is to segregate the majority of the work zone and isolate it from foraging/migrating/dispersing turtles. Oftentimes complete isolation of a work zone is not feasible due to accessibility needs and locations of staging/material storage areas, etc. In those circumstances, the barriers will be positioned to deflect migrating/dispersal routes away from the work zone to minimize potential encounters with turtles.
- c. The fencing will consist of non-reinforced 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. The Contractor is responsible for daily inspections of the fencing for tears or breeches in the fabric and accumulation levels of sediment, particularly following storm events of 0.25 inch or greater. APT will provide periodic inspections of the fencing throughout the duration

of construction activities, generally on a biweekly frequency or more frequently if site conditions warrant.

- d. The extent of the barrier fencing will be as shown on the site plans. The Contractor shall have additional barrier fencing should field or construction conditions warrant extending the fencing as directed by APT.
- e. No equipment, vehicles or construction materials shall be stored outside of the isolation 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 turtles, the absence of need to destroy animals that might be encountered and the need to follow Protective Measures as described in Section 4 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. Petroleum Materials Storage and Spill Prevention

- a. Certain precautions are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill due to the project's location in proximity to sensitive wetlands.
- b. A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the Contractor at the construction site throughout the duration of the project. In addition, a waste drum will be kept on site to contain any used absorbent pads/material for proper and timely disposal off site in accordance with applicable local, state and federal laws.
- c. The following petroleum and hazardous materials storage and refueling restrictions and spill response procedures will be adhered to by the Contractor.
 - i. Petroleum and Hazardous Materials Storage and Refueling
 - 1. Refueling of vehicles or machinery shall occur a minimum of 100 feet from wetlands or watercourses and shall take place on an impervious pad with secondary containment designed to contain fuels.
 - 2. Any fuel or hazardous materials that must be kept on site shall be stored on an impervious surface utilizing secondary containment a minimum of 100 feet from wetlands or watercourses.

ii. Initial Spill Response Procedures

1. Stop operations and shut off equipment.
2. Remove any sources of spark or flame.
3. Contain the source of the spill.
4. Determine the approximate volume of the spill.
5. Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby waterways or wetlands.
6. Ensure that fellow workers are notified of the spill.

iii. Spill Clean Up & Containment

1. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.
2. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
3. Isolate and eliminate the spill source.
4. Contact the appropriate local, state and/or federal agencies, as necessary.
5. Contact a disposal company to properly dispose of contaminated materials.

iv. Reporting

1. Complete an incident report.
2. Submit a completed incident report to the Connecticut Siting Council.

4. Turtle Protective Measures

- a. Prior to the start of construction each day, the Contractor shall search the entire work area for turtles.
- 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 same 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.

5. Herbicide and Pesticide Restrictions

- a. The use of herbicides and pesticides at the proposed wireless telecommunications facility and along the proposed access drive are strictly prohibited.

6. Reporting

- a. Monthly inspection reports (brief narrative and applicable photos) will be submitted to the Connecticut Siting Council for compliance verification. Any observations of turtles will be included in the reports.

- b. Following completion of the construction project, APT will provide a summary report to CTDEEP documenting the monitoring and maintenance of the barrier fence and erosion control measures.
- c. 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.