



# ATTACHMENT 6

# Natural Diversity Data Base Areas RIDGEFIELD, CT

June 2013

-  State and Federal Listed Species & Significant Natural Communities
-  Town Boundary

NOTE: This map shows general locations of State and Federal Listed Species and Significant Natural Communities. Information on listed species is collected and compiled by the Natural Diversity Data Base (NDDB) from a number of data sources. Exact locations of species have been buffered to produce the general locations. Exact locations of species and communities occur somewhere in the shaded areas, not necessarily in the center. A new mapping format is being employed that more accurately models important riparian and aquatic areas and eliminates the need for the upstream/downstream searches required in previous versions.

This map is intended for use as a preliminary screening tool for conducting a Natural Diversity Data Base Review Request. To use the map, locate the project boundaries and any additional affected areas. If the project is within a shaded area there may be a potential conflict with a listed species. For more information, complete a Request for Natural Diversity Data Base State Listed Species Review form (DEP-APP-007), and submit it to the NDDB along with the required maps and information. More detailed instructions are provided with the request form on our website.

[www.ct.gov/deep/nddbrequest](http://www.ct.gov/deep/nddbrequest)

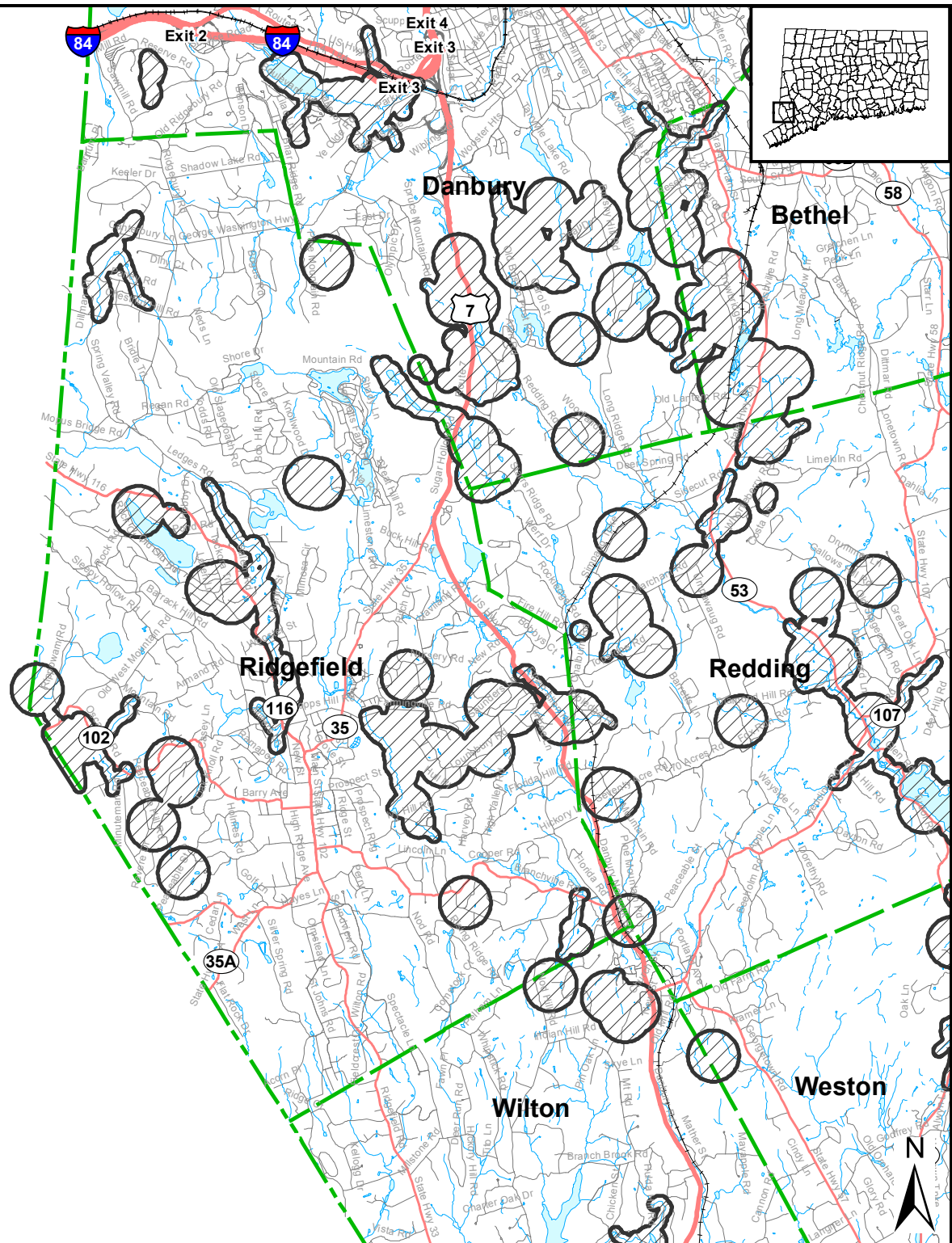
This file has PDF Layers. Look for the Layers tab on the left. Expand the layers and use the "eye" icons to change visibility.

QUESTIONS: Department of Energy and Environmental Protection (DEEP)  
79 Elm St., Hartford CT 06106  
Phone (860) 424-3011



Connecticut Department of  
Energy & Environmental Protection  
Bureau of Natural Resources  
Wildlife Division

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Miles





January 29, 2014

**Ms. Laura Saucier**  
**Department of Energy & Environmental Protection**  
**79 Elm Street**  
**Hartford, Connecticut 06106-5127**  
**Laura.Saucier@ct.gov**

**APT Project No.: CT283122**

**Re: NDDB #201305326**  
**Homeland Towers Ridgefield Facility**  
**Old Stagecoach Road and**  
**Aspen Ledges Road intersection**  
**Ridgefield, Connecticut**

Dear Ms. Saucier,

All-Points Technology Corporation, P.C. ("APT") is pleased to respond to your letter of January 10, 2014 (enclosed) regarding Natural Diversity Data Base ("NDDB") records indicating the following extant populations of federal and state endangered bog turtle (*Glyptemys muhlenbergii*) and state species of special concern eastern box turtle (*Terrapene carolina carolina*) within the vicinity of the referenced proposed Homeland Towers site.

The enclosed bog turtle and eastern box turtle protective measures program ("Program") has been designed to avoid unintentional mortality to either turtle species as a result of construction activities occurring during these species' active periods. Provided the project receives approval by the Connecticut Siting Council, this Program would be incorporated as environmental notes into the construction drawings (Development and Management Plans) to promote acknowledgement and implementation of the protective measures. The Program follows recommendations contained in previous Connecticut Department of Energy & Environmental Protection consultations for protection of these species for similar projects<sup>1</sup> and consists of several components, including: isolation of the project perimeter; periodic inspection and maintenance of isolation structures; turtle sweeps; education of all contractors and sub-contractors prior to initiation of work on the site; protective measures; and, reporting. An example of the poster materials that would be posted at the construction site as part of the contractor education component is also enclosed. With adherence to this bog turtle and eastern box turtle protection Program, the proposed development at this property would not have an adverse effect on these species.

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<sup>1</sup> Please feel free to contact Dawn McKay to review previous consultations and turtle protection plans submitted by Dean Gustafson.

It is our continuing pleasure to work with you regarding the protection of Connecticut's rare species. We thank you for your time and respectfully request your written concurrence to this approach. Please feel free to contact me by telephone at (860) 984-9515 or via email [dgustafson@allpointstech.com](mailto:dgustafson@allpointstech.com) with any questions or if additional information is required.

Sincerely,

A handwritten signature in blue ink that reads "Dean Gustafson". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Dean Gustafson  
Senior Environmental Scientist

Enclosures

# January 10, 2014 NDDB Letter

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Connecticut Department of

**ENERGY &  
ENVIRONMENTAL  
PROTECTION**

January 10, 2014

Dean Gustafson  
All-Points Technology Corporation  
3 Saddlebrook Drive  
Killingworth, CT 06419

Re: Homeland Towers Ridgefield - Site No. CT897 in Ridgefield, Connecticut

Dear Mr. Gustafson:

Materials pertaining to the above project were forwarded to me for review by the DEEP Natural Diversity Database (NDDDB). Their records indicate that the federal and state endangered bog turtle (*Glyptemys muhlenbergii*) and state species of special concern box turtle (*Terrapene carolina carolina*) occur in the vicinity of this project.

The preferred habitat of the bog turtle is bogs, swamps, and marshy meadows having clear slow-moving streams with soft bottoms. Draining and flooding of their habitat is a major ecological problem as well as habitat degradation from forest succession, invasive plant species and changes to the hydrology of wetland systems. This species has been negatively impacted by the loss of suitable habitat. Care should be taken to minimize sedimentation and erosion resulting from construction and maintenance of this tower so as to not degrade the wetlands and watercourses associated with the Titicus River system. Silt fencing should be removed as soon as soils are stable so that amphibian and reptile movement between wetlands and uplands is not impeded. Sedimentation and erosion products that contain plastic netting are not recommended due to high incidents of wildlife entanglements and subsequent mortality.

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 semi-aquatic, 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. This species is dormant from November 1 to April 1. It has been negatively impacted by the loss of suitable habitat.

From the project and habitat descriptions provided and proximity to existing records, it is likely that eastern box turtle habitat will be impacted. The Wildlife Division recommends that a herpetologist familiar with the habitat requirements of these species conduct surveys between April and September to see if they are present. A report summarizing the results of such surveys should include habitat descriptions, reptile species list, survey techniques and a statement/resume giving the herpetologist's qualifications. The DEEP doesn't maintain a list of qualified herpetologists. A DEEP Wildlife Division permit may be required by the herpetologist to conduct survey work; you should ask if your herpetologist has one. The results of this investigation can be forwarded to the Wildlife Division and, after evaluation, recommendations for additional surveys, if any, will be made.

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Natural Diversity Database 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 Database should not be substituted 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 Database as it becomes available.

This is a preliminary site review and is not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to the DEEP for the proposed site. Please be advised that should state permits be required or should state involvement occur in some other fashion, specific restrictions or conditions relating to the species discussed above may apply. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division should be requested and species-specific surveys may be required. If the proposed project has not been initiated within one year of this Wildlife Division review, you should contact the NDDDB for an updated review.

If you have any additional questions, please feel free to contact me at [Laura.Saucier@ct.gov](mailto:Laura.Saucier@ct.gov), please reference the NDDDB number at the bottom of this letter when you e-mail or write.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Saucier", followed by a horizontal line extending to the right.

Laura Saucier  
Wildlife Biologist

NDDDB 201305326

# Bog Turtle and Eastern Box Turtle Protection Plan

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## **BOG TURTLE AND EASTERN BOX TURTLE PROTECTION PROGRAM**

Federal and state endangered bog turtle (*Glyptemys muhlenbergii*) and state special concern eastern box turtle (*Terrapene carolina carolina*), afforded protection under the federal and Connecticut Endangered Species Acts, are known to occur in the vicinity of this project. The following protective measures shall be followed to help avoid degradation of habitat or unintentional mortality as a result of construction activities for the site improvements proposed. Due to differences in the habitat preferences and the project's vicinity to those habitats, the conservation strategies differ for bog turtle and eastern box turtle. The focus for eastern box turtle is to protect individuals that may be encountered during construction while habitat protection is the focus for bog turtle. These protective measures satisfy recommendations from the Connecticut Department of Energy & Environmental Protection ("CTDEEP") Wildlife Division as specified in a January 10, 2014 letter and follow protocols developed from previous rare species consultations and state-approved protection plans. This protection plan is valid until January 10, 2015, 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 particularly if work will occur during the 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 bog turtle and eastern box turtle protection measures are implemented properly and will provide an education session on Eastern Box 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 project will not result in direct impact to wetlands or watercourses. The Contractor is strictly prohibited from placing fill in wetlands or watercourse or temporarily storing equipment or materials in wetlands or watercourses.

The proposed bog turtle and eastern box turtle protection program consists of several components: isolation of the project perimeter; use of appropriate erosion control measures to minimize wildlife entanglement; periodic inspection and maintenance of isolation structures and erosion control measures; 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 Homeland Tower 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 (net less) or netting composed of planar woven natural biodegradable fiber to avoid/minimize wildlife entanglement.
- b. 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 prior to start of construction activities.

- 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. 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.
- 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 emphasizing the non-aggressive nature of Eastern Box Turtles, 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 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 that form part of the watershed to Titicus River, known to provide habitat for bog turtle.
- 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 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. Biweekly inspection reports (brief narrative and applicable photos) will be submitted to the Connecticut Siting Council for compliance verification.
- 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 bog turtle or eastern box 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.

# Bog Turtle and Eastern Box 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 Corporation, P.C. at (860) 984-9515.**

# CAUTION

## BOG TURTLES ARE KNOWN TO INHABIT THIS AREA



photo courtesy of Paul J. Fusco

**Identification:** The bog turtle (*Glyptemys muhlenbergii*), the rarest turtle in Connecticut, is a small-sized turtle ranging from 3 to 3.5 inches long. It has an orange or yellow head patch which is sometimes divided into two parts. The large scutes (shell segments) of the dark carapace (upper shell) have yellow or reddish hues.

**Protection of habitat:** Bog turtles are protected by federal and state of Connecticut's threatened and endangered species legislation and **cannot** be injured, killed, or retained as a pet. Bog turtles inhabit wetland areas, in particular calcareous (containing calcium carbonate, calcium, or lime) wetlands. Preferred habitat includes bogs, swamps, and marsh meadows having clear slow-moving streams with soft bottoms. Wetlands located on the subject property are associated with Titicus River, a known habitat for bog turtle. **Therefore, it is important to avoid any impact to wetlands or watercourses located on the subject property.**

**Who to contact:** Wetland boundaries on the subject property will be clearly marked prior to construction activities. Please contact **Dean Gustafson of All-Points Technology Corporation, P.C. at (860) 984-9515** with any questions regarding the location of wetlands or to report any sightings of bog turtles.