

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF AMERICAN TOWER CORPORATION (ATC)
AND NEW CINGULAR WIRELESS PCS, LLC (AT&T) FOR A
CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF A TELECOMMUNICATIONS TOWER
FACILITY AT 701 LYDALL STREET MANCHESTER,
CONNECTICUT

DOCKET NO. 453

December 18, 2014

AMERICAN TOWER CORPORATION (ATC) and
NEW CINGULAR WIRELESS PCS LLC (AT&T)
REQUEST FOR ADMINISTRATIVE NOTICE

The Applicants, American Tower Corporation (ATC) and New Cingular Wireless PCS LLC (AT&T), respectfully request the Siting Council to take administrative notice of the enclosed November 12, 2014 correspondence from the Connecticut Department of Energy & Environmental Protection (DEEP) and the October 6, 2014 No Effect Determination from the State Historic Preservation Officer (SHPO).

Please be advised that ATC will implement the eastern box turtle protection measures as set forth in the enclosed DEEP correspondence.

CERTIFICATE OF SERVICE

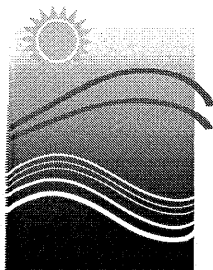
I hereby certify that on this day, an original and fifteen copies of the foregoing was sent electronically and by overnight mail to the Connecticut Siting Council.

Dated: December 18, 2014

A handwritten signature in cursive script that reads "Lucia Chiochio". The signature is written in black ink and is positioned above a horizontal line.

Lucia Chiochio

cc: Blake Paynter, ATC
Michele Briggs, ATC
Jennifer Young Gaudet, HPC Wireless
David A. Jermakian, Dynamic Environmental Associates, Inc.



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

November 12, 2014

Mr. David A. Jermakian
Dynamic Environmental Associates, Inc.
3850 Lake Street
Macon GA 31204
djermakian@dynamicenvironmental.com

Project: New Telecommunications Facility "Vernon Risley CT Tower Site, 701 Lydall Street in Manchester, Connecticut
NDDDB Determination No.: 201410089

Dear David,

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map provided for the proposed new telecommunications facility "Vernon Risley CT Tower Site" located at or near 701 Lydall Street in Manchester, Connecticut. According to our information there are extant populations of State Special Concern *Terrapene carolina carolina* (eastern box turtle) in the area where this work will occur. If possible, conduct project activities between October 1 and April 1 in order to avoid impacting active turtles. If any work will occur when these turtles are active (April 1st to September 30th) I would recommend the following protection strategies be implemented in order to protect these turtles:

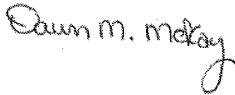
- Silt fencing should be installed around the work area prior to construction;
- After silt fencing is installed and prior to construction, a sweep of the work area should be conducted to look for turtles;
- Workers should be apprised of the possible presence of turtles, and provided a description of the species
(http://www.ct.gov/dep/cwp/view.asp?a=2723&q=473472&depNav_GID=1655);
- Any turtles that are discovered should be moved, unharmed, to an area immediately outside of the fenced area, 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; and
- All silt fencing should be removed after work is completed and soils are stable so that reptile and amphibian movement between uplands and wetlands is not restricted.

Thank you for implementing these protection measures for box turtle. I have attached a "Box Turtle" fact sheet for your files. This determination is good for one year. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by November 12, 2015.

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. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

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.

Sincerely,



Dawn M. McKay
Environmental Analyst 3

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.

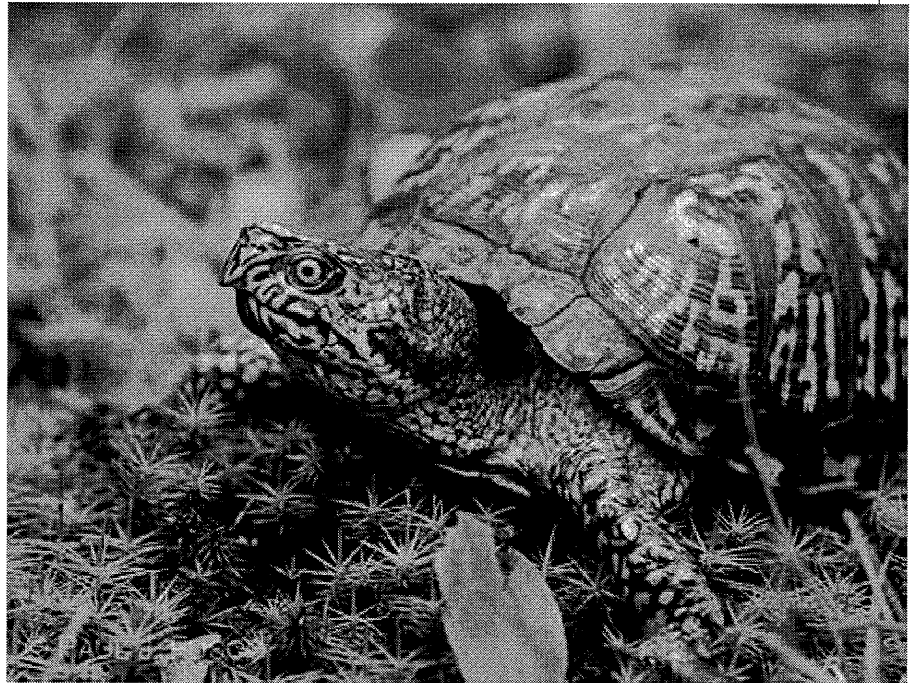
Each individual turtle has distinctive head markings. Males usually have red eyes and a concave plastron, while females have brown eyes and a flat plastron. Box turtles also have a horny beak, stout limbs, and feet that are webbed at the base. This turtle gets its name from its ability to completely 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-



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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.



Department of Economic and
Community Development

Connecticut
still revolutionary

State Historic Preservation Office

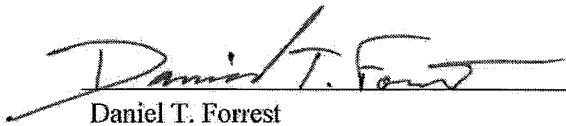
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PROJECT REVIEW COVER FORM

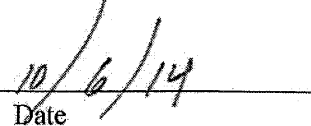
SHPO USE ONLY

Based on our review of the information provided to the State Historic Preservation Office, it is our opinion that:

- No historic properties will be affected by this project. No further review is requested.
- This project will cause no adverse effects to the following historic properties. No further review is requested:
- This project will cause no adverse effects to the following historic properties, conditional upon the stipulations included in the attached letter:
- Additional information is required to complete our review of this project. Please see the attached letter with our requests and recommendations.
- This project will adversely affect historic properties as it is currently designed or proposed. Please see the attached letter for further details and guidance.



Daniel T. Forrest
Deputy State Historic Preservation Officer



Date