

## **ENVIRONMENTAL NOTES**

### **Resource Protection Plan**

As a result of the proposed development's location in the vicinity of wetlands and vernal pool habitats, the following Best Management Practices ("BMPs") are recommended to avoid unintentional impact to wetland habitats or mortality to vernal pool herpetofauna (i.e., spotted salamander, wood frog, turtles, etc.) during construction activities. This plan includes elements that will protect herpetofauna should construction activities occur during peak amphibian movement periods (early spring breeding [March 1st to May 15th] and late summer dispersal [July 15th to September 15th]) as well as wetlands regardless of the time of year. Complete details of the recommended BMPs are provided below, which will be incorporated into the construction drawings to ensure the Contractor is fully aware of the project's environmentally sensitive setting.

A wetland scientist from All-Points Technology Corp. ("APT") experienced in compliance monitoring of construction activities will serve as the Environmental Monitor for this project to ensure that the following BMPs are implemented properly. The proposed resource protection program consists of several components including: isolation of the tower/compound perimeter; periodic inspection and maintenance of erosion controls and isolation structures; herpetofauna sweeps; education of all contractors and sub-contractors prior to initiation of work on the site; protective measures; and, reporting.

#### **1. Erosion and Sedimentation Controls**

- a. Plastic netting with large mesh openings ( $> \frac{1}{4}$ " ) 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 project. Temporary erosion control products that will be exposed at the ground surface represent a potential for wildlife entanglement will use either erosion control blankets and fiber rolls composed of processed fibers mechanically bound together to form a continuous matrix (netless) or netting with a mesh size  $< \frac{1}{4}$ " such as that typically used in compost filter socks to avoid/minimize wildlife entanglement.
- b. Installation of erosion and sedimentation controls, 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 herpetofauna and satisfactorily installed. The intent of the barrier is to segregate the majority of the work zone from migrating/dispersing herpetofauna. 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 herpetofauna.

- c. If a staging area for equipment, vehicles or construction materials is required for this project, such area(s) shall be located outside of any wetland resource Buffer Zone and surrounded by silt fence to isolate the area from possible migrating herpetofauna.
- d. All erosion control measures shall be removed within 30 days of completion of work and permanent stabilization of site soils so that herpetofauna movements between uplands and wetlands are not restricted.

## **2. Contractor Education:**

- a. Prior to work on site and initial deployment/mobilization of equipment and materials, the Contractor shall attend an educational session at the pre-construction meeting with the Environmental Monitor. This orientation and educational session will consist of information such as, but not limited to: representative photographs of typical herpetofauna that may be encountered, rare that could be encountered (if possible), typical species behavior, and proper procedures to protect such species if they are encountered. The meeting will further emphasize the non-aggressive nature of these species, the absence of need to destroy such animals and the need to follow Protective Measures as described in Section 4 below. The Contractor will designate one of its workers as the "Project Monitor", who will receive more intense training on the identification and proper handling of herpetofauna.
- b. The Contractor will designate a member of its crew as the Project Monitor to be responsible for the daily "sweeps" for herpetofauna within the work zone each morning, during any and all transportation of vehicles along the access drive, and for any ground disturbance work. This individual will receive more intense training from the Environmental Monitor on the identification and protection of herpetofauna in order to perform sweeps. Any herpetofauna discovered will be reported to the Environmental Monitor, photographed if possible, and relocated outside the work zone in the general direction the animal was oriented.
- c. The Environmental Monitor will also post caution signs throughout the project site and maintain them for the duration of construction to provide notice of the environmentally sensitive nature of the work area, the potential for encountering various amphibians and reptiles and precautions to be taken to avoid injury to or mortality of these animals.
- d. The Contractor will be provided with the Environmental Monitor's cell phone and email contact information to immediately report any encounters with herpetofauna.

### **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 wetland resources.
- 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 take place on an impervious pad with secondary containment designed to contain fuels.
    2. Any refueling drums/tanks 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 local, state and federal agencies, as required.

#### **4. Protective Measures**

- a. A thorough cover search of the construction area will be performed by the Environmental Monitor for herpetofauna prior to and following installation of erosion control measures/silt fencing barriers to remove any species from the work zone prior to the initiation of construction activities. Any herpetofauna discovered would be relocated outside the work zone in the general direction the animal was oriented. Periodic inspections will be performed by the Environmental Monitor throughout the duration of construction.
- b. The Contractor's Project Monitor will inspect the work area each morning and escort initial vehicle access into the site each morning along the access drive to visually inspect for any herpetofauna. Any herpetofauna discovered would be relocated outside the work zone in the general direction the animal was oriented.
- c. Any herpetofauna requiring relocation out of the work zone will be captured with the use of a net or clean plastic bag that has been moistened with clean water for careful handling and placement out of the work zone in the general direction it was observed heading.
- d. Any stormwater management features, ruts or artificial depressions that could hold water created intentionally or unintentionally by site clearing/construction activities will be properly filled in and permanently stabilized with vegetation to avoid the creation of vernal pool "decoy pools" that could intercept amphibians moving toward the vernal pools. Stormwater management features such as level spreaders will be carefully reviewed in the field to ensure that standing water does not endure for more than a 24-hour period to avoid creation of decoy pools and may be subject to field design changes. Any such proposed design changes will be reviewed by the design engineer to ensure stormwater management functions are maintained.

#### **5. Reporting**

- a. Inspection reports (brief narrative and applicable photos) will be prepared by the Environmental Monitor documenting each inspection and submitted to the Permittee for compliance verification. Any non-compliance observations of erosion control measures or evidence of erosion or sediment release will be immediately reported to the Permittee and its Contractor and included in the reports.
- b. Any incidents of release of sediment or other materials into wetland resource areas shall be reported by the Permittee within 24 hours to the required agencies.
- c. Any observations of rare species will be reported to the Connecticut Department of Energy and Environmental Protection's Natural Diversity Data Base Program.
- d. Following completion of the project, a summary report will be prepared by the Environmental Monitor documenting compliance with the Resource Protection Plan and submitted to the Permittee, who shall submit a copy to the Connecticut Siting Council.