

## ENVIRONMENTAL NOTES - RESOURCE PROTECTION PROGRAM

### WETLAND AND RARE SPECIES PROTECTION MEASURES

AS A RESULT OF THE PROJECT'S LOCATION IN THE VICINITY OF SENSITIVE HABITATS INCLUDING WETLAND RESOURCES AND RARE SPECIES, THE FOLLOWING PROTECTION PROGRAM SHALL BE IMPLEMENTED BY THE CONTRACTOR TO AVOID UNINTENTIONAL IMPACTS TO PROXIMATE WETLAND RESOURCES AND RARE SPECIES DURING CONSTRUCTION ACTIVITIES.

WOOD TURTLE (GLYPTEMYS INSULICUTA), A STATE SPECIAL CONCERN SPECIES AFFORDED PROTECTION UNDER THE CONNECTICUT ENDANGERED SPECIES ACT, IS KNOWN TO OCCUR ON OR PROXIMITY TO THE PROPOSED FACILITY. THESE RARE SPECIES PROTECTION MEASURES ARE SIMILAR TO PROTECTION MEASURES PREVIOUSLY APPROVED BY THE CONNECTICUT DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION ("DEP") WILDLIFE DIVISION ON OTHER COMPARABLE PROJECTS. DETAILS OF PROTECTION MEASURES TO BE IMPLEMENTED IN ASSOCIATION WITH CONSTRUCTION AND MAINTENANCE OF THE FACILITY ARE PROVIDED BELOW.

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. THE WETLAND PROTECTION MEASURES SHALL BE IMPLEMENTED AND MAINTAINED THROUGHOUT THE DURATION OF CONSTRUCTION ACTIVITIES UNTIL PERMANENT STABILIZATION OF SITE SOILS HAS OCCURRED.

ALL-POINTS TECHNOLOGY CORPORATION, P.C. ("APT") WILL SERVE AS THE ENVIRONMENTAL MONITOR FOR THIS PROJECT TO ENSURE THAT THESE PROTECTION MEASURES ARE IMPLEMENTED PROPERLY AND WILL PROVIDE AN EDUCATION SESSION ON THE PROJECT'S PROXIMITY TO SENSITIVE WETLANDS PRIOR TO THE START OF CONSTRUCTION ACTIVITIES. THE CONTRACTOR SHALL CONTACT DEAN GUSTAFSON, SENIOR WETLAND SCIENTIST AT APT, AT LEAST 5 BUSINESS DAYS PRIOR TO THE PRE-CONSTRUCTION MEETING. MR. GUSTAFSON CAN BE REACHED BY PHONE AT (860) 552-2033 OR VIA EMAIL AT DGUSTAFSON@ALLPOINTSTECH.COM.

THIS RESOURCES PROTECTION PROGRAM CONSISTS OF SEVERAL COMPONENTS INCLUDING: EDUCATION OF ALL CONTRACTORS AND SUB-CONTRACTORS PRIOR TO INITIATION OF WORK ON THE SITE; INSTALLATION OF EROSION CONTROLS; PETROLEUM MATERIALS STORAGE AND SPILL PREVENTION; PROTECTIVE MEASURES; RARE SPECIES PROTECTION MEASURES; HERBICIDE, PESTICIDE, AND SALT RESTRICTIONS; AND REPORTING.

#### 1. 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 TO EMPHASIZE THE ENVIRONMENTALLY SENSITIVE NATURE OF THE PROJECT, THE VARIOUS WETLAND AND RARE SPECIES RESOURCES, AND THE REQUIREMENT TO DILIGENTLY FOLLOW THE PROTECTIVE MEASURES AS DESCRIBED IN SECTIONS BELOW. WORKERS WILL ALSO BE PROVIDED INFORMATION REGARDING THE IDENTIFICATION OF OTHER TURTLES, SNAKES, COMMON HERPETOFAUNA THAT COULD BE 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 FOLLOWING SECTIONS. THE CONTRACTOR WILL DESIGNATE ONE OF ITS WORKERS AS THE "PROJECT MONITOR", WHO WILL RECEIVE MORE INTENSE TRAINING ON THE IDENTIFICATION AND PROTECTION OF WOOD TURTLES.

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, SNAKES AND AMPHIBIANS WILL BE DOCUMENTED.

c. THE CONTRACTOR WILL DESIGNATE A MEMBER OF ITS CREW AS THE PROJECT MONITOR TO BE RESPONSIBLE FOR THE PERIODIC "SWEEPS" FOR TURTLES AND OTHER HERPETOFAUNA WITHIN THE CONSTRUCTION ZONE EACH MORNING AND FOR ANY GROUND DISTURBANCE WORK. THIS INDIVIDUAL WILL RECEIVE MORE INTENSE TRAINING FROM APT ON THE IDENTIFICATION AND PROTECTION OF WOOD TURTLES AND OTHER HERPETOFAUNA IN ORDER TO PERFORM SWEEPS. ANY HERPETOFAUNA DISCOVERED WOULD BE TRANSLOCATED OUTSIDE THE WORK ZONE IN THE GENERAL DIRECTION THE ANIMAL WAS ORIENTED.

d. THE CONTRACTOR'S PROJECT MONITOR WILL BE PROVIDED WITH CELL PHONE AND EMAIL CONTACTS FOR APT PERSONNEL. EDUCATIONAL POSTER MATERIALS WILL BE PROVIDED BY APT AND DISPLAYED ON THE JOB SITE TO MAINTAIN WORKER AWARENESS AS THE PROJECT PROGRESSES.

e. APT WILL ALSO POST CAUTION SIGNS THROUGHOUT THE PROJECT SITE FOR THE DURATION OF THE CONSTRUCTION PROJECT PROVIDING 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.

f. IF ANY RARE SPECIES ARE ENCOUNTERED, THE CONTRACTOR SHALL IMMEDIATELY CEASE ALL WORK, AVOID ANY DISTURBANCE TO THE SPECIES, AND CONTACT APT.

#### 2. EROSION AND SEDIMENTATION CONTROLS/SOLATION BARRIERS

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 PROJECT. TEMPORARY EROSION CONTROL PRODUCTS THAT WILL BE EXPOSED AT THE GROUND SURFACE AND 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 COMPOSED OF PLANAR WOVEN NATURAL BIODEGRADABLE FIBER TO AVOID/MINIMIZE WILDLIFE ENTANGLEMENT.

b. EXCLUSORIALLY FENCING SHALL BE AT LEAST 20 INCHES TALL AND MUST BE SECURED TO AND REMAIN IN CONTACT WITH THE GROUND AND BE REGULARLY MAINTAINED BY THE CONTRACTOR (AT LEAST BI-WEEKLY AND AFTER MAJOR WEATHER EVENTS) TO SECURE ANY GAPS OR OPENINGS AT GROUND LEVEL THAT MAY LET ANIMAL PASS THROUGH.

c. THE EXTENT OF THE EROSION CONTROLS WILL BE AS SHOWN ON THE SITE PLANS. THE CONTRACTOR SHALL HAVE ADDITIONAL SEDIMENTATION AND EROSION CONTROLS STOCKPILED ON SITE SHOULD FIELD OR CONSTRUCTION CONDITIONS WARRANT EXTENDING DEVICES. IN ADDITION TO THE CONTRACTOR MAKING THESE DETERMINATIONS, REQUESTS FOR ADDITIONAL CONTROLS WILL ALSO BE AT THE DISCRETION OF THE ENVIRONMENTAL MONITOR.

d. INSTALLATION OF SEDIMENTATION AND EROSION CONTROLS, REQUIRED FOR EROSION CONTROL COMPLIANCE AND CREATION OF A BARRIER TO POSSIBLE MIGRATING/DISPERSING TURTLES, 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 WOOD TURTLE (ALONG WITH OTHER AMPHIBIANS AND REPTILES THAT MAY BE ENCOUNTERED) AND DOCUMENT BARRIERS HAVE BEEN SATISFACTORILY INSTALLED. THE INTENT OF THE BARRIER IS TO SEGREGATE THE MAJORITY OF THE WORK ZONE AND ISOLATE IT FROM NESTING/FORAGING/MIGRATING/DISPERSING TURTLES, SNAKES AND OTHER HERPETOFAUNA. OFTENTIMES COMPLETE ISOLATION OF A WORK ZONE IS NOT FEASIBLE DUE TO ACCESSIBILITY NEEDS AND LOCATIONS OF STAGING/MATERIAL STORAGE AREAS, ETC. ALTHOUGH THE BARRIERS MAY NOT COMPLETELY ISOLATE THE WORK ZONE, THEY WILL BE POSITIONED TO DEFLECT MIGRATING/DISPERSING ROUTES AWAY FROM THE WORK ZONE TO MINIMIZE POTENTIAL ENCOUNTERS WITH TURTLES, SNAKES AND OTHER HERPETOFAUNA.

e. THE CONTRACTOR SHALL BE RESPONSIBLE FOR DAILY INSPECTIONS OF THE SEDIMENTATION AND EROSION CONTROLS FOR TEARS OR BREACHES AND ACCUMULATION LEVELS OF SEDIMENT, PARTICULARLY FOLLOWING STORM EVENTS THAT GENERATE A DISCHARGE, AS DEFINED BY AND IN ACCORDANCE WITH APPLICABLE LOCAL, STATE AND FEDERAL REGULATIONS. THE CONTRACTOR SHALL NOTIFY THE APT ENVIRONMENTAL MONITOR WITHIN 24 HOURS OF ANY BREACHES OF THE SEDIMENTATION AND EROSION CONTROLS AND ANY SEDIMENT RELEASES BEYOND THE PERIMETER CONTROLS THAT IMPACT WETLANDS, WATERCOURSES OR AREAS WITHIN 100 FEET OF WETLANDS. THE APT ENVIRONMENTAL MONITOR WILL PROVIDE PERIODIC INSPECTIONS OF THE SEDIMENTATION AND EROSION CONTROLS THROUGHOUT THE DURATION OF CONSTRUCTION ACTIVITIES ONLY AS IT PERTAINS TO THEIR FUNCTION TO PROTECT NEARBY WETLANDS. SUCH INSPECTIONS WILL GENERALLY OCCUR ONCE PER MONTH. THE FREQUENCY OF MONITORING MAY INCREASE DEPENDING UPON SITE CONDITIONS, LEVEL OF CONSTRUCTION ACTIVITIES IN PROXIMITY TO SENSITIVE RECEPTORS, OR AT THE REQUEST OF REGULATORY AGENCIES. IF THE ENVIRONMENTAL MONITOR IS NOTIFIED BY THE CONTRACTOR OF A SEDIMENT RELEASE, AN INSPECTION WILL BE SCHEDULED SPECIFICALLY TO INVESTIGATE AND EVALUATE POSSIBLE IMPACTS TO WETLAND RESOURCES.

f. THIRD PARTY MONITORING OF SEDIMENTATION AND EROSION CONTROLS WILL BE PERFORMED BY OTHER PARTIES, AS NECESSARY, UNDER APPLICABLE LOCAL, STATE AND/OR FEDERAL REGULATIONS AND PERMIT CONDITIONS.

g. NO EQUIPMENT, VEHICLES OR CONSTRUCTION MATERIALS SHALL BE STORED WITHIN 100 FEET OF WETLAND OR WATERCOURSE RESOURCES.

h. ALL SILT FENCING AND OTHER EROSION CONTROL DEVICES SHALL BE REMOVED WITHIN 30 DAYS OF COMPLETION OF WORK AND PERMANENT STABILIZATION OF SITE SOILS. IF FIBER ROLLS/WATTLES, STRAW BALES, OR OTHER NATURAL MATERIAL EROSION CONTROL PRODUCTS ARE USED, SUCH DEVICES WILL NOT BE LEFT IN PLACE TO BIODEGRADE AND SHALL BE PROMPTLY REMOVED AFTER SOILS ARE STABLE SO AS NOT TO CREATE A BARRIER TO WILDLIFE MOVEMENT. SEED FROM SEEDING OF SOILS SHOULD NOT SPREAD OVER FIBER ROLLS/WATTLES AS IT MAKES THEM HARDER TO REMOVE ONCE SOILS ARE STABILIZED BY VEGETATION.

#### 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 WETLAND RESOURCES.

b. IF A SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN FOR THIS PROJECT, PER THE REQUIREMENTS OF 40 CFR 112, HAS

BEEN DEVELOPED FOR THIS FACILITY, PLEASE REFER TO THE SPCC FOR SPECIFIC REQUIREMENTS. BASIC REQUIREMENTS FOR PETROLEUM MATERIALS STORAGE AND SPILL PREVENTION ARE PROVIDED BELOW. IN THE EVENT THESE BASIC REQUIREMENTS CONTRADICT THE SPCC, THE CONTRACTOR SHALL RELY ON REQUIREMENTS PROVIDED IN THE SPCC.

c. 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.

d. THE SERVICE OF MACHINERY SHALL NOT OCCUR WITHIN 100 FEET OF WETLANDS OR WATERCOURSES.

e. AT A MINIMUM, 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 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.

#### 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 WETLANDS AND VERNAL POOL.  
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 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 NECESSARY, INCLUDING THE CONNECTICUT SITING COUNCIL.

#### 4. HERBICIDE, PESTICIDE, AND SALT RESTRICTIONS

a. THE USE OF HERBICIDES AND PESTICIDES AT THE FACILITY SHALL BE MINIMIZED. IF HERBICIDES AND/OR PESTICIDES ARE REQUIRED AT THE FACILITY, THEIR USE WILL BE USED IN ACCORDANCE WITH CURRENT INTEGRATED PEST MANAGEMENT ("IPM") PRINCIPLES WITH PARTICULAR ATTENTION TO AVOID/MINIMIZE APPLICATIONS WITHIN 100 FEET OF WETLAND AND VERNAL POOL RESOURCES.

b. MAINTENANCE OF THE FACILITY DURING THE WINTER MONTHS SHALL MINIMIZE THE APPLICATION OF SALT OR SIMILAR PRODUCTS FOR MELTING SNOW OR ICE. NON-CHLORIDE BASED DEICING PRODUCTS ARE RECOMMENDED.

c. WOOD TURTLE PROTECTION MEASURES - CONSTRUCTION PHASE

a. PRIOR TO CONSTRUCTION AND FOLLOWING INSTALLATION OF ISOLATION BARRIERS, THE CONSTRUCTION AREA WILL BE SWEEPED BY APT AND ANY TURTLES OCCURRING WITHIN THE WORK AREA WILL BE RELOCATED TO SUITABLE HABITAT OUTSIDE OF THE ISOLATION BARRIERS.  
b. PRIOR TO THE START OF CONSTRUCTION EACH DAY, THE CONTRACTOR SHALL SEARCH THE ENTIRE WORK AREA FOR TURTLES.  
c. IF A TURTLE IS FOUND DURING THE ACTIVE PERIOD, IT SHALL BE IMMEDIATELY MOVED, UNHARMED, BY BEING 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 HEADING. THESE ANIMALS ARE PROTECTED BY LAW AND NO TURTLES SHOULD BE RELOCATED FROM THE PROPERTY.  
d. 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.

e. THE CONTRACTOR SHALL BE PARTICULARLY DILIGENT DURING THE MONTHS OF MAY AND JUNE WHEN TURTLES ARE ACTIVELY SELECTING NESTING SITES WHICH RESULTS IN AN INCREASE IN TURTLE MOVEMENT ACTIVITY.

f. NO HEAVY MACHINERY OR VEHICLES MAY BE PARKED IN ANY TURTLE HABITAT.

g. AVOID AND LIMIT ANY EQUIPMENT USE WITHIN 100 FEET OF WETLANDS AND NO HEAVY MACHINERY OR VEHICLES MAY BE PARKED IN ANY TURTLE HABITAT OR WITHIN 100 FEET OF WETLANDS.

h. SPECIAL PRECAUTIONS MUST BE TAKEN TO AVOID DEGRADATION OF WETLAND HABITATS, PARTICULARLY ALONG AN PERENNIAL STREAM RIPARIAN CORRIDORS.

#### 6. TURTLE PROTECTION MEASURES - FACILITY MAINTENANCE (MOWING RECOMMENDATIONS)

a. PERFORM MOWING DURING THE TURTLE DORMANT PERIOD - NOVEMBER 1<sup>ST</sup> THROUGH MARCH 31<sup>ST</sup> WHEN POSSIBLE.  
b. IF MOWING IS REQUIRED OUTSIDE OF THE TURTLE DORMANT PERIOD, AVOID MOWING DURING MAY 15<sup>TH</sup> THROUGH AUGUST 30<sup>TH</sup> WHEN TURTLES MAY BE LOCATED WITHIN THE FACILITY (AND AWAY FROM FORESTED HABITAT). IF POSSIBLE, UNDERSTANDING THAT SOME VEGETATION MAINTENANCE IS NECESSARY FOR OPERATIONAL AND ELECTRICAL SAFETY PURPOSES.  
c. VEGETATION MAINTENANCE WITHIN THE FENCED SOLAR FACILITY MAY BE ACCOMPLISHED THROUGH SHEEP GRAZING. SHOULD THAT TECHNIQUE BE USED, MOWING RESTRICTIONS WOULD NOT APPLY; MOWING RECOMMENDATIONS OUTSIDE OF THE FENCED FACILITY WOULD STILL APPLY.  
d. IF MOWING IS REQUIRED DURING THE TURTLE ACTIVE SEASON (APRIL 1<sup>ST</sup> THROUGH OCTOBER 31<sup>ST</sup>), MOWING SHOULD BE PERFORMED AS FOLLOWS.  
i. MOWING STYLE: AVOID FLAIL MOWER HEADS WITH GUIDE BARS THAT RIDE ALONG THE GROUND. SICKLE BAR MOWERS WILL HAVE THE LEAST IMPACT IF MOWING EVERY 1-5 YEARS. IN AREAS WITH MORE WOODY VEGETATION >1-2" DIAMETER BRONTOSAURUS-STYLE MOWER WILL LIKELY HAVE THE LEAST IMPACT ON TURTLES.  
ii. MOWING HEIGHT: IF MOWING DURING ACTIVE SEASON, RETENTION OF MOWING STUBBLE TO 7-12 INCHES WILL REDUCE MORTALITY, REDUCE BLADE WEAR, AND WILL LEAVE IMPORTANT COVER FOR ANIMALS.  
iii. DIRECTIONALITY: IF MOWING DURING THE ACTIVE SEASON IS NECESSARY, START MOWING FROM THE CENTER OF THE FIELD AND USE A BACK-AND-FORTH APPROACH, OR LARGE CIRCULAR PATTERN, TO AVOID CONCENTRATING FLEEING ANIMALS WHERE THEY MAY BE KILLED OR STRANDED. IN ADDITION, LEAVE AN UN-MOWED 30 FT STRIP AROUND THE PERIMETER OF THE FIELD AND MOW THIS AREA LAST. MOST TURTLES ARE FOUND IN THESE AREAS, AND THIS PROVIDES TIME FOR THEM TO REACT TO THE MOWING ACTIVITY AND MOVE OUT OF THE AREA.  
iv. MOWER SPEED: MOVING IN LOW GEAR OR AT SLOW SPEEDS WILL ALLOW TURTLES TO REACT AND MOVE OUT OF THE FIELD.  
v. UN-MOWED EDGE: LEAVING AN UN-MOWED FIELD EDGE IN HIGH TURTLE USE AREAS UNTIL AFTER SEPTEMBER 15TH. WOOD TURTLES ARE OFTEN IN FIELD EDGES CLOSEST TO NEARBY STREAMS.

#### 7. REPORTING

a. A COMPLIANCE MONITORING REPORT (BRIEF NARRATIVE AND APPLICABLE PHOTOS) DOCUMENTING EACH APT INSPECTION WILL BE SUBMITTED BY APT TO THE PERMITTEE AND ITS CONTRACTOR FOR COMPLIANCE VERIFICATION OF THESE PROTECTION MEASURES. THESE REPORTS ARE NOT TO BE USED TO DOCUMENT COMPLIANCE WITH ANY OTHER PERMIT AGENCY APPROVAL CONDITIONS (I.E., DEEP STORMWATER PERMIT MONITORING, ETC.). 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. ANY OBSERVATIONS OF RARE SPECIES WILL BE INCLUDED IN THE REPORTS.

b. FOLLOWING COMPLETION OF THE CONSTRUCTION PROJECT, APT WILL PROVIDE A FINAL COMPLIANCE MONITORING REPORT TO THE PERMITTEE DOCUMENTING IMPLEMENTATION OF THIS WETLAND AND RARE SPECIES PROTECTION PROGRAM AND MONITORING OBSERVATIONS. THE PERMITTEE IS RESPONSIBLE FOR PROVIDING A COPY OF THE FINAL COMPLIANCE MONITORING REPORT TO THE CONNECTICUT SITING COUNCIL FOR COMPLIANCE VERIFICATION.

c. ANY OBSERVATIONS OF RARE SPECIES WILL BE REPORTED TO DEP BY APT ON THE APPROPRIATE SPECIAL ANIMAL REPORTING FORM, WITH PHOTO-DOCUMENTATION (IF POSSIBLE) AND SPECIFIC INFORMATION ON THE LOCATION AND DISPOSITION OF THE ANIMAL.

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#### CSC PERMIT SET

NO	DATE	REVISION
1	07/26/24	CSC SUBMISSION
2	11/25/24	INTERROGATORIES
3		
4		
5		
6		
7		