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NHESP File #22-41294  
159 West Main Street  
Groton, MA  
4-18-2023

## **Blanding's Turtle Protection Plan**

### **US EPA Emergency Response and Removal Project at Former Squannacook Sportsmans Club Site**

Prior to the commencement of any hazardous material remediation activity within the project site, a temporary turtle barrier shall be installed around the limit of work. The turtle barrier shall be installed prior to April 15, which is the start of the active season for Blanding's Turtles (April 15 – October 15), unless otherwise approved in writing by the NHESP. Upon installation, the turtle barrier shall be inspected by a qualified wildlife biologist. No work can take place until the biologist has determined that the barrier fence was installed properly. If installed prior to April 15, no pre-construction turtle surveys are required; however if installed during the active season, a turtle survey shall be performed within the fenced area.

#### **Temporary Turtle Barriers**

- 1) The proposed temporary turtle barriers, comprised of entrenched silt fencing, must be installed along the entire Limit of Work encircling the work footprint.
- 2) Installation of the temporary turtle barriers must be conducted so as to minimize vegetation disturbance. It is not appropriate to clear large access paths prior to sweeps for turtle. No clearing may occur outside the Limit of Work approved by the NHESP.
- 3) The bottom of the silt fencing must be carefully buried in a 4-6 inch deep trench. The trench must be backfilled and compacted. If it is not possible to dig a trench, then the bottom of the barrier must be affixed to the surface.
- 4) The silt fencing must be composed of at least 2½ feet of vertical barrier above ground. The face of the material must be relatively smooth. Once installed, the barrier shall be taut between the stakes. Slumps or loose materials will undermine the effectiveness of the barrier. No backer material shall be utilized.
- 5) If vehicles or heavy machinery must enter the active work area during the Blanding's turtle active season, the barrier shall include a temporary "Turtle Gate" which can remain open during work hours but must be closed at all other times between April 15<sup>th</sup> and October 15<sup>th</sup> (of any year) in order to prevent turtles from entering the site during non-work hours.
- 6) If installed during the active season, silt fencing should be installed immediately prior to the required searches described below.
- 7) LEC shall obtain a Scientific Collection Permit and/or NHESP interim authorization in order to handle any turtles encountered during inspections or, if required, turtle surveys.



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*Pre-Construction Turtle Survey (Only if Barrier Installed During Blanding's Turtle Active Season)*

- 8) Prior to any searches, LEC shall inspect the barriers to confirm proper installation and functionality for turtle protection.
- 9) Searches will take place within the fenced area during appropriate weather conditions on multiple days between April 15<sup>th</sup> and October 15<sup>th</sup> (unless otherwise approved by NHESP). The total sweep effort will be four sweep hours per acre of alteration. If the project is conducted in phases, and thus land is cleared in phases, the barrier fence shall be installed, and area swept for each individual phase accordingly, with four hours of sweep time per acre performed prior to work starting on each phase.
- 10) Any state-listed vertebrate species encountered during these searches shall be released in appropriate habitat outside of the work footprint. All state-listed species encountered shall be reported to the NHESP through a Rare Animal Observation Report, submitted through MassWildlife's Heritage Hub, within 10 days of the observation.
- 11) Following the completion of searches by the qualified biologist, the biologist shall submit a report to the NHESP indicating the name(s) of the searcher(s), date(s) of the pre-work search, the number of hours searched (per date), presence or absence of turtles, information on any turtles found, weather conditions, and condition of all turtle barriers.

*Contractor Education*

- 13) Prior to the start of work, a NHESP-approved wildlife biologist shall provide educational materials to the site supervisor on the likely presence of Blanding's Turtles within the vicinity of the work footprint. Materials will include a fact sheet containing details of life history and proper identification of Blanding's Turtles and instructions for protocols should a turtle be encountered within the construction footprints.

*Routine Turtle Barrier Protection*

- 14) *During the Turtle Active Season (April 15 through October 15)*—Once per week, a person familiar with barrier maintenance and installation shall inspect the barrier and facilitate any repairs or alterations. The turtle barrier should remain taut between stakes and any holes along the bottom repaired immediately.
- 15) *Outside the Turtle Active Season (October 16 through April 14)*—During late March in any future years if work continues over the winter months, the NHESP-approved wildlife biologist shall conduct an early season inspection of the barrier and facilitate any repairs or alteration necessary for the barrier to function for turtle protection. A summary report with photographs shall be submitted to NHESP by April 15<sup>th</sup> of that year.
- 16) Barriers shall be removed from the site once work is complete.