Blanding’s Turtle Protection Plan  
for  
Commercial Redevelopment  
151 Taylor Street  
Littleton, MA  

MA NHESP File No. 20-39129  

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Prepared for:  
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Blanding’s turtle is listed as “Threatened” by the Massachusetts Division of Fisheries and Wildlife (MDFW). The species is additionally known to inhabit the significant marshland habitat to the west and southwest of the Site and individuals are known to travel excessive distances from wetlands to areas of disturbed soils for nesting, including to newly disturbed construction sites. 

Oxbow Associates, Inc. (OA) has prepared this Turtle Protection Plan to avoid incidental mortality (prohibited, “take”; 321 CMR 10.02) to Blanding’s turtle (Emydoidea blandingii) as prohibited by the MA Endangered Species Act (MESA) at the subject property during the course of redevelopment of 151 Taylor Street, Littleton, MA. 

The mortality avoidance plan proposed herein is comparable to similar measures endorsed by NHESP for analogous projects in the Commonwealth. OA will obtain a Scientific Collecting Permit from Massachusetts Division of Fisheries and Wildlife (MDFW) prior to activity season for Blanding’s turtles in the implementation of this plan. 

Although the majority of the upland portion of the 29+/- acre Site is pre-developed (+/- 7.1 acres), the manipulation and exposure of soils during construction is likely to attract gravid animals during the nesting season, and trespass by animals is possible during site work in the general case.
Most of the proposed site improvements are within the pre-developed footprint of approximately 7.1 site-acres. Approximately 1.5 acres of currently unimproved land area is proposed to be integrated into the redevelopment project, primarily for stormwater management.

The mortality avoidance plan presumes commencement of site work in advance of the activity season (April 15 through October 31) in 2020. A contingency plan is provided in the event that initiation of site work, or more particularly, isolation of the Site, is delayed beyond April 15.

A brief memorandum will be provided to NHESP within 10 days of initiation of the mortality avoidance plan, whether it consists of passive, pre-season exclusion, or active Site clearing of animals prior to site work. The memo report will include the NHESP tracking number and contact information for the individual filing the report. OA will prepare and submit Rare Animal Observation forms, if, and as needed.

1. **Blanding’s Turtle Protection Plan – 151 Taylor St., Littleton**

1. **Installation of a Turtle Exclusion Fence**
   
   Whereas site work is anticipated to commence in advance of April 15, 2020, in that case there is no need to “clear” the premises of Blanding’s turtles that typically remain exclusively within aquatic conditions up to that date. It is anticipated that prior to the commencement of work, the area will be sequestered with siltation fencing to function as a turtle barrier. Once installed, OA will confirm the barrier is installed properly (trenched-in, haybales on the work side of fence where otherwise required, fencing is secure and taut, etc.) and the fence will be inspected weekly by the contractor for the duration of the project during the active season. Temporary gates (e.g. PVC Half-Culverts or equivalent) are not proposed in this instance since the exclusion barrier will terminate at the Site entrance on an existing commercial driveway.

   **Exclusion Barrier Specifications:** The barrier will consist of a standard, 36-inch siltation fence, 300 lb burst strength material, trenched-in the ground approximately 6 inches, staked every 8 feet, and will be installed around the limit of work. Pre-staked fencing stock is not allowed. Use of a ditch-witch and chain saws for installation is recommended and required after April 15 if installation is delayed.

2. **Administration of a worker training program**

   Prior to the latter of initial construction work, or April 15 the construction crew, project foreman, and site engineers will be provided a brief (est. 15-20 minutes) introductory session relative to mortality avoidance for Blanding’s turtle specific to the Site. Laminated poster(s) with images of turtles, contact information for a qualified biologist and instructions regarding proper protocol if a Blanding’s turtle is encountered during work will be provided. These posters will be given to the construction supervisor and available for review by all workers.
3. **Maintenance of Turtle Barrier Fence**
   The fence will be inspected weekly by the contractor(s) for the duration of the project, and the construction access point will be maintained with as narrow an opening as practicable. If any damage occurs to the turtle barrier, it must be repaired immediately, photo-documented, and the turtle biologist notified.

4. **Contingent Clearing Surveys Prior to Initiating Work (> Apr. 15)**
   Only in the event that isolation of the Site is not possible prior to April 15, 2020, and upon confirmation that the barrier is installed correctly and construction access is suitably defined, visual surveys will be conducted by qualified turtle biologist(s). The limit of work enclosed by the fence (1.5+/- acres) will be surveyed prior to any tree clearing or earthwork. OA estimates a total of 6 staff-hours (1.5 acres x 4 hr = 6 field-hrs). These surveys shall occur under appropriate weather conditions for reptile surveys.

   NOTE ON SEASONAL RESTRICTION: If the Site is effectively isolated prior to April 15, or work does not commence until after October 31, surveys for turtles and the turtle barrier may be avoided or deferred depending on the estimated duration of construction.

5. **Turtle observations, relocations, and reporting**
   Any turtles encountered (State-listed or common) by contractors will be reported to the turtle biologist, and the turtle biologist shall relocate the turtle to a nearby location outside of the work area with similar conditions unless otherwise arranged. This will be completed under guidelines specified in the Scientific Collecting Permit from MDFW. Documentation will include standard morphometric data (mass, carapace length and depth), age as determined by annuli count, determination of sex, description of behavior and local environment at time of capture, and photographs taken of the animal. Any turtle locations will be recorded using hand-held GPS receivers with sub-meter accuracy and submitted to VPRS.

   Attachment: Orthophotographic Figure: Limit of Work