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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Plymouth Municipal Airport
PROJECT MUNICIPALITY	: Plymouth/Carver
PROJECT WATERSHED	: South Coastal and Buzzards Bay
EEA NUMBER	: 16692
PROJECT PROPONENT	: Plymouth Municipal Airport
DATE NOTICED IN MONITOR	: November 8, 2023

Pursuant to the Massachusetts Environmental Protection Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08(8) of the MEPA regulations (301 CMR 11.00), I have reviewed the Draft Environmental Impact Report (DEIR) and hereby determine that it **adequately and properly** complies with MEPA and its implementing regulations. The Proponent may prepare and submit for review a Final Environmental Impact Report (FEIR).

Project Description

As described in the DEIR, the Proponent proposes several improvements to the Plymouth Municipal Airport (the Airport) as outlined in the 2022 Technical Master Plan Update (TMPU), which evaluated aviation demand forecasts, facility requirements, airport access and geometry, and airside facility requirements over a 20-year planning horizon through 2042.[1] According to the DEIR, the TMPU has been developed with a focus on airside infrastructure (areas of the airport that support aircraft activity) needed to meet Federal Aviation Administration (FAA) airport safety standards as well future aviation demand. The TMPU also included a five-year Airport Capital Improvement Plan (ACIP) describing work anticipated to occur at the Airport between 2023 and 2027. For projects after the five-

[1] According to the DEIR, data collected in 2021 was used as the baseline in developing the TMPU.

year ACIP period, the FAA-approved Airport Layout Plan (ALP) identifies projects projected through 2042. As described below, the project is received FAA funding and, therefore, is required to undergo environmental review under the National Environmental Policy Act (NEPA), which is the federal counterpart to MEPA. This DEIR will serve as the Draft EA under NEPA, and has been published for comment to assist in determining whether the project will result in a Significant Impact; the FEIR filed with MEPA is anticipated to serve as the Final EA under NEPA. The NEPA review has identified the "Proposed Action" as the series of projects included in the five-year ACIP, and the "Project" under MEPA shall be considered the same as the "Proposed Action" for purposes of this review.[2] The DEIR notes that one or more Notice of Project Change (NPC) filings may be required for future projects within the 20-year time horizon of the ALP.

According to the DEIR, the primary project proposed under the ACIP consists of the construction of a 351 foot (ft) long by 75 ft wide extension to the Runway 6 end of Runway 6-24 for a new total runway length of 5,001 ft (described and referred to as the "Runway 6 project") in order to meet FAA safety standards, and to allow for safer approach and takeoff distances. The extension of Runway 6 will be accompanied by 351 ft long by 35 ft wide extension of Taxiway E, a full-length parallel taxiway on the north side of the runway.[3] The Runway 6 project will also construct a 351 ft extension to Taxilane A,[4] a partial length taxilane located on the south side of the runway; a new run-up apron area along the southwestern end of the extended Taxiway A; and two new aircraft hangars approximately 100 ft by 100 ft (20,000 square feet (sf) total) located along Taxilane A. Additional work will include the relocation of the Medium Intensity Runway Lighting (MIRL), Medium Intensity Approach Light System with Sequenced Flashing Lights (MALSF), Precision Approach Path Indicator (PAPI), and Runway End Identifier Lights (REILS) for Runway 6. Other projects proposed under the ACIP include:

- Water/ Wastewater Sewer Main Upgrades
  - Construction of 3,000 linear feet (lf) of gravity sewer main and associated appurtenances on the southwest side of the Airport.
- Gate 3 Taxilane Reconstruction
  - Full depth pavement reconstruction of the Gate 3 Taxilane (50,000 sf) immediately adjacent to the porta-port hangars[5]
- Reconstruction of Runway 6-24
  - Full depth pavement reconstruction of a 4,350 ft by 75 ft section of Runway 6-24
- Emergency Generator Airside Infrastructure
  - Purchase and installation of an emergency generator which will serve as a backup power supply to operate airside infrastructure during a power outage.

[2] I note that treatment of a short-term (5 years) airport capital improvement plan as the "Project" for MEPA purposes is consistent with prior reviews conducted of similar regional airports. See EEA #15964 (Martha's Vineyard Airport), EEA #16128 (Nantucket Airport).

[3] A taxiway is a path used by aircrafts to travel from one area to another (such as from an airport terminal to a runway); unlike a runway, it is not used for takeoff/landing.

[4] A taxilane is the portion of the aircraft parking area used for access between taxiways, aircraft parking positions, and hangars. An apron is an area where aircraft are parked, loaded or unloaded, refueled, boarded, or maintained. A hangar is a building or structure designed to house aircrafts.

[5] A porta-port hangar is a type of mobile aircraft hangar.

Projects identified in the ACIP (collectively referred to as the "Proposed Action," or "Project" herein and in future filings) are anticipated to be constructed over five years, between 2023 and 2027, as funding is allocated as part of the FAA and Massachusetts Department of Transportation (MassDOT) Aeronautics Division capital planning cycle.

The DEIR states that the Airport is considered a regional General Aviation (GA) Airport, under FAA definitions, serving small aircraft and regional charter service. The Airport supports daily Air Taxi and Charter services; daily flights for medivac, agricultural, and law enforcement; daily flight training, and weekly Angel Flights in support of life-sustaining medical transfers. The DEIR states that the work proposed in the ACIP is intended to bring the Airport into compliance with FAA design criteria, as well as attract and retain compatible commercial businesses that could generate additional revenues, in an effort to recover from the operational losses incurred by the Covid-19 pandemic. The DEIR notes that the Project is not intended to, and the Airport has no desire to accommodate larger jets and commercial passenger operations given the additional design and safety requirements, and overall Airport expansion that would be required. However, the DEIR does project an overall increase in annual operations (based on the estimated annual growth rate of 0.43% used in the TMPU) between 2021 and 2041. Although the DEIR does not attribute the growth in operations to the Project, it states that the Project will allow Airport-based and visiting critical aircraft to fuel to a higher volume/capacity thereby impacting impacts operators and pilots' decisions to land and remain at the Airport versus choosing another airport to utilize. This should be clarified in accordance with the Scope.

Project Site

The Airport is located on approximately 758 acres in the towns of Plymouth and Carver.[6] The Airport has operated since 1934 and now supports multiple businesses including flight schools, aircraft maintenance, aircraft sales, and corporate flight departments. Approximately half of the site is developed and consists of paved runways, taxiways, hangars, an administration building, several office buildings, and other ancillary buildings. The undeveloped areas on the Airport include wetlands, upland grasslands, and forested habitats. Portions of South Meadow Pond and an unnamed pond, associated with a nearby cranberry bog, are located on the southern portion of the Airport. According to the TMPU, the Airport is also located over an EPA-designated Sole Source Aquifer (SSA). Land uses adjacent to the Airport include residential, commercial, agricultural (cranberry bogs) and open space.

The Airport operates two runways: Runway 15-33 is 4,650 ft long by 75 ft wide and is aligned in a northwest to southeast direction and Runway 6-24 (primary runway) is 4,650 ft long by 75 ft wide and is aligned in a northeast to southwest direction. Three of the four Airport approaches extend over the Town of Plymouth; however, approximately 250 acres, including the approach end of Runway 6, Gate 6 access, and associated access roadway lie in the Town of Carver. The Town of Plymouth has also incorporated the Airport Zone to protect the airspace surrounding the Airport.[7] Existing developed land within the Airport Zone includes a mixture of cranberry bogs, office space associated with the Airport,

[6] The Environmental Notification Form (ENF) identified the total Airport acreage as 785 acres; however, according to the DEIR, this did not account for property acquisitions and mitigation that resulted in a swap of land and a resulting conservation area on the easterly side of the Airport. The total resulting acreage of the Airport is 758 acres, of which 41.5 acres will have a permanent conservation restriction.

[7] The Airport Zone consists of the Airport property and several surrounding properties that have been incorporated into the AP-Airport Zoning District by the Town of Plymouth.

residential development, and some industrial/commercial development along South Meadow Road.

State and local wetland resource areas located within and adjacent to the Airport include Bordering Vegetated Wetlands (BVW), Isolated Vegetated Wetlands (IVW), and Bordering Land Subject to Flooding (BLSF). According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Panel No. 25023C0361K, 25023C0363K, and 25023C0364K effective July 6, 2021), portions of the Airport are located within Zone A. Additionally, according to the Massachusetts Natural Heritage and Endangered Species Program (NHESP) Atlas (15th Edition), the Airport also contains approximately 352 acres of mapped Estimated Habitat of Rare Wildlife and/or Priority Habitat of Rare Species (PH591); of this total, approximately 60 acres are managed pursuant to the Airport's NHESP-approved Grassland Management Plan for grassland bird species.

The Airport is located within one mile of one Environmental Justice (EJ) Population characterized as Income within the Town of Carver. The site is located within five miles of four additional EJ Populations characterized as Minority (3) and Income (1) within the Town of Plymouth.[8] As described below, the DEIR identified the "Designated Geographic Area" (DGA) for the Project as one mile around EJ Populations, included a review of potential impacts and benefits to the EJ Populations within this DGA, and described public involvement efforts undertaken to date.

Changes Since the ENF

Since the filing of the Environmental Notification Form (ENF), the scope of MEPA review has been expanded to include all projects proposed in the five-year ACIP. As noted above, this is consistent with the scope of federal NEPA review, and corresponds with the "Proposed Action"/"Project" reviewed under NEPA/MEPA. The FAA has evaluated the need to relocate and realign the Gate 6 Access Roadway and perimeter fence at the end of Runway 6 to avoid interference with the Runway 6 landing instrumentation and navigational aids. Based on the results of this evaluation, the FAA has determined that the perimeter fence will not need to be relocated. FAA funding is subject to the completion of NEPA review.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the series of the projects included in the five-year ACIP (the "Proposed Action"/"Project") include the direct alteration of 6.67 acres of land, the creation of 2.49 acres of impervious surface.[9] The Project is also expected to generate 26 New average daily trips (adt), construct 3,000 lf of sewer main, and result in a permanent loss of 2.49 acres of Priority Habitat for state-listed species.[10] Additional impacts may be associated with future work to be conducted under the TMPU.

Measures proposed to avoid, minimize, and mitigate environmental impacts include the use of erosion and sedimentation controls during construction; implementing stormwater management measures; use of construction-period Best Management Practices (BMPs) to minimize noise, air, and

[8] The EEA EJ Mapper is available at: https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts

[9] This represents a decrease of 0.37 acres of land alteration from the ENF.

[10] According to the DEIR, there will be a total of 22 adt by construction vehicles during Project implementation and 4 adt associated with each of the new hangars following the completion of construction.

water quality impacts; expansion and restoration of grassland habitat for state-listed species; and restorative plantings for temporarily disturbed areas. Additional measures should be identified in the FEIR.

Jurisdiction and Permitting

The Project is subject to MEPA review because it requires Agency Action and meets/exceeds the MEPA review thresholds at 301 CMR 11.03(2)(b) for greater than two acres of disturbance of designated habitat, as defined in 321 CMR 10.02, that results in a take of a state-listed endangered or threatened species or species of special concern and 301 CMR 11.03(6)(b)(3) for the expansion of an existing runway at an airport. The Project is required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a DGA of one or more EJ Populations. The Project will require Agency Actions in the form of an Amended Conservation and Management Permit (CMP) from NHESP and a Water Quality Certification (WQC) from the Massachusetts Department of Environmental Protection (MassDEP) pursuant to the 401 Water Quality Certification Regulations (314 CMR 9.00). Additional thresholds may be exceeded based on future projects proposed under the TMPU.

The Project will require an Order of Conditions (OOC) from the Carver Conservation Commission (or in the case of an appeal, a Superseding Order of Conditions from MassDEP). The Project (the "Proposed Action" under NEPA) will require the preparation and review of an Environmental Assessment (EA) under NEPA (FAA Order 5050.4B and 1050.1F), and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA). This DEIR will serve as the Draft EA under NEPA, and has been published for comment to assist in determining whether the project will result in a Significant Impact; the FEIR filed with MEPA is anticipated to serve as the Final EA under NEPA. Additional permitting may be needed for future work under the TMPU.

The Project, as well as other future work, will seek Financial Assistance from the Massachusetts Department of Transportation Department (MassDOT) Aeronautics Division. Therefore, MEPA jurisdiction is broad in scope and extends to all aspects of the Project that may cause Damage to the Environment, as defined in the MEPA regulations.

Review of the DEIR

The DEIR included a Project description, existing and proposed conditions plans, revised estimates of Project-related impacts, an updated alternatives analysis, noise study information, and an identification of measures to avoid, minimize and mitigate environmental impacts. The DEIR provided a response to comments on the EENF and draft Section 61 Findings. It also contained an assessment of the public health impacts of the Project, as well as information related to impacts on EJ Populations as required by 301 CMR 11.07(6)(n).

The Proponent provided supplemental information on December 13, 2023 which included an annotated response to comments on the ENF, conceptual plans for each alternative considered, a discussion of potential stormwater BMPs, and a supplemental EJ analysis. For purposes of clarity, all supplemental information provided by the Proponent are included in references to the "DEIR," unless otherwise indicated.

Alternatives Analysis

In response to the Scope, the DEIR identified the purpose and need of each project component of the Project. The DEIR also included an expanded alternatives analysis that reevaluated alternative designs for each of the Runway 6 Extension project components (which were previously evaluated in the ENF), and discussed several of the other projects proposed as part of the ACIP. In particular, the DEIR states that the Gate 3 Taxilane Reconstruction and Reconstruction of Runway 6-24 are both considered "Routine Maintenance" and/or "Replacement Project" under the MEPA regulations (301 CMR 11.02) and have been excluded from the expanded alternatives analysis; however, this was not determined through an advisory ruling issued by the MEPA Office. In addition, the DEIR states that the proposed emergency generator will be located a in a disturbed sand/gravel area (approximately ten ft by ten ft) immediately adjacent to the flight school near existing energy infrastructure and no other location is feasible for this installation; therefore, impacts from the installation of this equipment are considered *de minimis* and were not further analyzed. However, the DEIR does not present alternative designs or locations for the two proposed aviation hangars or the expanded sewer main. Rather, the DEIR states that the two proposed aviation hangars are intended to supplement previously approved hangars that have yet to be constructed and have been sited adjacent to the existing Taxilane A apron, thereby minimizing land alteration and the addition of impervious surfaces. In addition, the DEIR states that there is no alternative location for the sewer main extension, which is required to upgrade substandard systems and meet existing demand.

According to the DEIR, the purpose and need of the Project is to comply with FAA safety standards and Airport design requirements. The DEIR indicates that the Airport is required to implement specific modifications to meet certain FAA design standards and achieve the highest level of safety. In particular, the TMPU determined that the Airport was in need of various design improvements to bring it into compliance and to be able to accommodate the critical aircraft. The Project will also allow the Airport to address existing operational constraints and position the Airport to respond effectively and efficiently to both current and future needs. The DEIR provides the following table, detailing the purpose and need of each component of the Project and associated MEPA thresholds:

Year	Project	*ENF Category* And/or MEPA Threshold	Purpose & Need
2023	**Runway 6/24 & Taxiway E/A Extension Environmental Assessment**	• 301 CMR 11.03(2)(b)(2) Non-mandatory EIR; Other MEPA review per ENF Certificate State-listed species under MGL c 131A MESA >2 acres of disturbance of Priority Habitat; • 301 CMR 11.03(6)(b)(3) Non-mandatory EIR; Other MEPA review per ENF Certificate for Expansion of an existing runway; • 301 CMR 11.05(4)(a) - 1-mile DGA	NEPA & MEPA Review as precursor to RW 6/24 & TW E/A Extensions to improve safety by providing, to the extent practicable, runway and taxiway lengths and runway safety area layouts that meet FAA standards for the design/critical aircraft (AC 150/5300-13B, Airport Design AC 150/5325-4B, Runway Length Requirements)
2024	**Design and Permit Runway 6 Extension/ Taxiway E/A**	[See 2023 above]	Meet FAA design requirements at AC 150/5300-13B, Airport Design AC 150/5325-4B, Runway Length Requirements
	Water / Wastewater Upgrades Sewer Main	[Subsurface installation within or immediately adjacent to existing Gate 6 access road footprint outside of fenced; Below thresholds for Water withdrawal and Wastewater]	Construction of <3,000 linear feet (lf) of gravity sewer main and associated appurtenances on the southwest side of Airport to upgrade substandard systems to meet applicable state design and capacity requirements to meet demand
2025	**Extend Runway 6/24 (351' x 75')**	[See 2023 above]	Meet FAA design requirements at AC 150/5300-13B, Airport Design AC 150/5325-4B, Runway Length
	Extend Taxiway E/A (700'x35'/1000'x35')		
	Gate 3 Taxilane Reconstruction	MEPA Exempt 301 CMR 11.01(2)(b)(3) Routine Mtc; Replacement	Full depth pavement reconstruction (~50,000 sf) immediately adjacent to the porta-port hangars
2026	**Reconstruction Runway 6/24**	MEPA Exempt 301 CMR 11.01(2)(b)(3) Routine Mtc; Replacement	Partial depth pavement reconstruction within existing footprint / envelope of RW 6/24
	Emergency Generator Airside Infrastructure	[Does not meet or exceed thresholds for Land, Energy, Air]	Impervious pad <~100 SF (10'x10') to hold generator providing emergency backup to existing energy system.
[TBD]	**Hangars – 2 x each approximately 100' x 100' (20,000 sq ft)**	301 CMR 11.03(1) Does not meet/exceed threshold; 301 CMR 11.03(2)(b) [reviewed under EA/EIR 2023] [Per MEPA ENF under *Structures*]	Meet existing demand for hangar space (located north of the Gate 6 Access Road and along Taxilane A)

The expanded alternatives analysis provides a comprehensive evaluation of the alternatives considered for the Runway 6 extension and Taxiway A/Taxiway E extension components of the Project, and supports the selection of the Preferred Alternative for each of those project components. However, as noted above, the expanded alternatives analysis did not include an evaluation of the other components of the Project. In particular, the DEIR states that the Gate 3 Taxilane Reconstruction and Reconstruction of Runway 6-24 are both considered "Routine Maintenance" and/or "Replacement Project," and were therefore, excluded from further evaluation; however, no formal determination regarding the applicability of the MEPA regulations on these project components has been made. In addition, the expanded alternatives analysis does not present alternative designs or locations for the two proposed aviation hangars or the expanded sewer main, both of which could have the potential to support the growth of Airport operations. The analysis of project alternatives is a central element of the MEPA review process and a consideration of alternatives for each project component should be presented to support the selection of the Preferred Alternative. The alternatives analysis should be supplemented in accordance with the Scope.

Environmental Justice (EJ)

The Airport is located within one mile of one EJ Population characterized as Income within the Town of Carver. The site is located within five miles of four additional EJ Populations characterized as Minority (3) and Income (1) within the Town of Plymouth.[11] Additionally, no languages were identified as being spoken by 5% or more of Limited English Proficiency ("LEP") residents within one mile of the Airport.

The DEIR describes the public involvement plan that the Project has undertaken to engage with EJ Populations. In accordance with the Scope, the Proponent obtained an updated "EJ Reference List" from the MEPA office, which included a list of Community Based Organizations (CBOs) and tribes/indigenous organizations. An updated EJ screening form was sent to the EJ Reference List indicating that the ACIP is under MEPA review with opportunities for public involvement. The Proponent held an evening, in-person public meeting for the Project on November 28, 2023, at the Plymouth Municipal Airport Administration Building, which was attended by 16 members of the public.[12] According to the Public Engagement Plan included with the DEIR, in advance of the meeting, the Proponent published a notice on the Project website and sent out a digital mailing to a list of stakeholders, which included the EJ Reference List, including information on the date, time, and location of the meeting.[13] A Project specific e-mail address was also created for communication about the Project.[14] The DEIR indicates that the Proponent remains committed to a comprehensive community outreach process and plans to continue efforts to engage with community members and groups to provide opportunities for the public to learn more about the Project, ask questions, and share concerns as the Project progresses.

The DEIR contains a baseline assessment of any existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations in accordance with 301 CMR 11.07(6)(n)1. and the MEPA Interim Protocol for Analysis of EJ Impacts. According to the DEIR, the data surveyed show some indication of an existing "unfair or inequitable" burden impacting the identified EJ Populations. The DPH EJ Tool identifies two municipalities (Plymouth and Carver) and four census tracts within the one mile DGA as exhibiting "vulnerable health EJ criteria"; this term is defined in the DPH EJ Tool to include any one of four environmentally related health indicators that are measured to be 110% above statewide rates based on a five-year rolling average.[15] Specifically, within the Project's DGA, Plymouth, Carver, census tract 5301, census tract 5302, census tract 5309, and census tract 5441 meet the vulnerable health EJ criteria for the following parameters:

- Heart attack hospitalization (Plymouth and Carver)
- Childhood blood lead (Census tract 5302)

[11] The EEA EJ Mapper is available at: https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts

[12] Confirmed via email on January 16, 2024 from Brenda Bhatti (Dubois & King) to Nicholas Moreno (MEPA).

[13] Available at: https://pymairport.com/technical-master-plan-update.

[14] PlymouthMAAirportRW6EA@dubois-king.com

[15] See https://matracking.ehs.state.ma.us/Environmental-Data/ej-vulnerable-health/environmental-justice.html. Four vulnerable health EJ criteria are tracked in the DPH EJ Viewer by municipality (heart attack hospitalization, childhood asthma, childhood blood lead, and low birth weight), and two (childhood blood lead, and low birth weight) are also available on a census tract level.

- Low birth weight (Carver, census tract 5301, census tract 5309 and census tract 5441)

In addition, the DEIR indicates that the following sources of potential pollution exist within the one-mile DGA or within EJ block groups that are located partially within the one-mile DGA, based on the mapping layers available in the DPH EJ Tool:

- Major air and waste facilities: 2
- M.G.L. c. 21E sites: 4
- "Tier II" toxics use reporting facilities: 6
- MassDEP groundwater discharge permits: 2
- MassDEP public water suppliers: 11
- Underground storage tanks: 1
- EPA facilities: 1
- Road infrastructure: 1 (State Route 58)
- Region transit agencies: 1 (Greater Attleboro Taunton Regional Transit Authority)
- Energy generation and supply: 1 (transmission lines)

Although not required by the MEPA Interim Protocol for Analysis of EJ Impacts, the DEIR also surveyed environmental indicators tracked through the U.S. EPA's "EJ Screen," which shows a percentile measure of each indicator by census block as compared to the MA statewide average. The DEIR evaluated the following indicators within the one mile DGA:

- Particulate Matter (PM) 2.5: 17th percentile
- Ozone: 34th percentile
- NATA Diesel Particulate Matter (DPM): 9th percentile
- NATA Air Toxics Cancer Risk: 1st percentile
- NATA Respiratory Hazard Index Ratio: 2nd percentile
- Traffic Proximity: 22nd percentile
- Lead Paint: 8th percentile
- Superfund Proximity: 4th percentile
- RMP Facility Proximity: 58th percentile
- Hazardous Waste Proximity: 17th percentile
- Underground Storage Tanks: 26th percentile
- Wastewater Discharge: 50th percentile

None of the indicators are shown to be 80th percentile or higher of statewide average. This shows conditions over the entire 1-mile DGA, and not for any particular EJ Population within that radius.

The DEIR states that while the EJ Populations within the DGA may exhibit some existing unfair or inequitable environmental burden, the Project is not expected to materially exacerbate such existing conditions. According to the DEIR, no Per- and Polyfluorinated Substances (PFAS) remediation is included as part of any projects proposed under the ACIP and the Airport does not have any records of PFAS releases on the property. The main sources of potential construction period impacts are emissions from construction equipment, motor vehicles and fugitive dust emissions from disturbed soil surface areas. According to the DEIR, any minor construction adverse effects would be mitigated to the greatest

extent practicable through use of construction period BMPs. As discussed below, the DEIR presented additional air quality and noise analysis to show that construction impacts will not materially deteriorate air quality conditions near EJ Populations.

Air Quality

The DEIR indicates that a qualitative air quality analysis was conducted to assess the existing air quality in the Project area and to determine how the air quality would likely be impacted by the Project. The analysis evaluated background concentrations of the six criteria pollutants, ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), lead (Pb), particulate matter (PM) (PM_{10}), fine particulate matter ($PM_{2.5}$), and sulfur dioxide (SO_2), regulated under the Federal National Ambient Air Quality Standards (NAAQS). As stated in the DEIR, background concentrations were determined from the closest available monitoring station to the Project site; here, the Boston (Harrison Avenue) monitoring station is the nearest monitoring location for which data are available for all criteria pollutants (an approximately 35 mile distance). This station is located in an urban area near major roads and is therefore considered a conservative estimate of background air concentrations at the Airport. In particular, the background concentrations at the Harrison Avenue monitoring station were measured as follows:

- O_3 are 121.7 micrograms per cubic meter ($\mu g/m^3$) (compared to the NAAQS requirement of 147.0 $\mu g/m^3$;
- CO are 1,840 $\mu g/m^3$ (compared to the NAAQs requirement of 40,000 $\mu g/m^3$);
- NO_2 are 83 $\mu g/m^3$ (compared to the NAAQS requirement of 188 $\mu g/m^3$);
- Pb are 0.003 $\mu g/m^3$ (compared to the NAAQS requirement of 0.15 $\mu g/m^3$);
- PM_{10} are 28 $\mu g/m^3$(compared to the NAAQS requirement of 150 $\mu g/m^3$);
- $PM_{2.5}$ are 14 $\mu g/m^3$ (compared to the NAAQS requirement of 35 $\mu g/m^3$); and
- SO_2 are 5.2 $\mu g/m^3$ (compared to the NAAQS requirement of 196 $\mu g/m^3$).[16]

According to the DEIR, the Project includes additional infrastructure and installation of an emergency backup generator. Emergency generator engines are subject to MassDEP's Industry Performance Standards at 310 CMR 7.26(42). These regulations require that the engine operator submit a one-time certification, which includes established emission limits and design criteria, engine operation limits, and recommendations to reduce sound impacts. The DEIR states that based on air quality data trends and with the installation of an emergency backup generator, the Project will not result in additional emissions that would result in an exceedance of the NAAQS.

The DEIR states that while the Project will not significantly affect traffic volumes over the long term, there could be a temporary increase in heavy truck traffic on local roads during construction. In particular, over the entire construction period, an average of approximately nine diesel dump trucks trips per day is anticipated. The peak period is estimated to be during the reconstruction of Runway 6-24 in 2026, resulting in approximately 22 average daily trips (adt) over a 90-day timeframe (equivalent of 11 truck trips per day going in two directions, to and from the Airport). Truck and construction traffic will

[16] For short-term exposures, the O_3 NAAQS is defined as the 98th percentile of one-hour daily maximum concentrations, averaged over three years. For short-term exposures, the CO, NO_2, and SO_2 NAAQS is defined as the 98th percentile of one-hour daily maximum concentrations, averaged over three years. For Pb, PM_{10}, and $PM_{2.5}$, the design value for short-term exposures is the 98th percentile of the maximum daily (24-hour) concentration, averaged over three years.

be commensurate with typical large, short-term construction projects. Pending the determination of material suppliers and their locations and logistics, the designated access route to and from the Airport is anticipated to be via South Meadow Road towards State Route 3 (away from the EJ Population) or along South Meadow Road to State Route 58 (adjacent to the EJ Population). The DEIR states that given the minimal vehicle traffic anticipated, Transportation Demand Management (TDM) measures are not proposed as part of the Project.

Noise

In accordance with the Scope, the DEIR includes an assessment of noise levels associated with existing airport operations, as well as potential changes as a result of the Project. The DEIR states that the FAA has determined that the cumulative noise exposure of individuals to noise resulting from aviation activities must be established in terms of the day-night average sound level (DNL), which is a 24-hour average sound level in decibels (dB). While the FAA does not typically require noise studies for GA airports, as they do for commercial airports, a noise analysis incorporating the Project was performed, as part of the TMPU, because the number of existing jet operations at the Airport exceeds the FAA threshold for a noise analysis (of 700 annual jet operations). Noise modeling using the FAA-approved Aviation Environmental Design Tool (AEDT) system was completed using 2021 data (baseline data used for the TMPU), where the Airport experienced an annual total of 61,021 operations, of which 4,271 were jets. Because the Project proposes an extension of Runway 6, the noise modeling was presented to show the change in extent of the 65dB and 70dB noise contours. According to the DEIR, an increase in sound levels of 1.5dB or more in an area already exposed to a DML of 65dB or greater, constitutes a significant impact under FAA regulations (FAA Order 1050.1F).

The noise analysis was conducted using the Falcon 2000 aircraft, which is the design aircraft for the Airport. Aircraft operations were modeled with half of all operations using Runway 6-24 (of which the Runway 6 end will be extended under the Project) and half using Runway 15-33. Based on the results of the analysis both the 65dB and 70dB noise contours remain within the Airport property boundary at the Runway 6 extension end. Although the DEIR states that Project only involves an extension of the runway at the end of Runway 6, it is not entirely clear whether any increase in jet operations would result, directly or indirectly from this extension. In addition, the Airport has a formal noise abatement program in place which consists of four elements:

- Aircraft Approach – establishes flight procedures and a map for pilots and aircraft to minimize noise impacts on surrounding residential communities;
- Corporate – establishes flight procedures and a map depicting a “quicker right” turn off of departure from Runway 6 (heading northerly off the RW 24 end) and a “slow left” turn off the Runway 24 departure heading southerly off the RW 6 end towards the bogs on the southwest end of the Airport;
- General Aviation (non-corporate jet) – establishes flight procedures for three runway departure patterns with maps identifying “noise sensitive” areas; and
- Helicopter – establishes a map depicting helicopter departure patterns that avoid specific noise sensitive areas.

According to the DEIR, the FAA prohibits Airport-mandated restrictions of flight paths, hours of operation, and unduly prohibition of open access to airports. Therefore, the Airport’s noise abatement

program can only be voluntary. The DEIR states that the Airport is committed to working with pilots utilizing the Airport on a voluntary basis to abate and mitigate noise issues as much as possible.

Public Health / Sole Source Aquifer (SSA)

As noted above, the Airport is located over the Plymouth-Carver SSA, which encompasses approximately 199 square miles, including all or portions of six municipalities. According to the DEIR, the Airport maintains a Groundwater Management Plan which includes procedures and policies to minimize potential impact on groundwater from Airport activities. Specifically, it addresses the storage, handing, and disposal of hazardous materials; aircraft fueling; maintenance of septic systems and stormwater systems; and groundwater monitoring. Hydrologic studies indicate that groundwater in the SSA generally moves in a north to south direction. In addition, there is a U.S. Geological Survey (USGS) groundwater monitoring well located at South Meadow Road on the northwest side of the Airport, which came online on December 5, 2014, and has continuously monitored depth to groundwater.

As described in the comment letter provided by the EPA, incorporated herein by reference, the Project has the potential to impact the underlying SSA via wastewater flows, stormwater discharges, and construction activities. Comments provided by the EPA state that the DEIR does not provide sufficient information to assess the potential for groundwater impacts associated with the Project. Comments state that additional information regarding the loading and release of potential contaminants to groundwater, including via runoff or stormwater infiltration, is needed to understand potential impacts to groundwater or the SSA and if any follow-up groundwater assessments are warranted. In addition, comments note that the DEIR does not provide any descriptive information about the locations of public or private water supply wells or other drinking water sources (relative to potential groundwater impact areas), depth to groundwater, or groundwater flow directions. Based on the lack of information, comments state the EPA does not agree with the preliminary conclusion that groundwater or the SSA will not be affected by the Project. Given the location of the Airport above an EPA-designated SSA, additional information in needed to fully evaluate whether Project will result in potential impacts to groundwater and the SSA.

Land Alteration, Impervious Surfaces, and Stormwater

According to the DEIR, land alteration and the addition of impervious surface are a direct result of the runway, taxiway, and taxilane extension; construction of a new run-up apron and two new aviation hangars (that will utilize the existing taxilane A apron rather than creating all new impervious surface); and the relocation of associated navigational aids. In accordance with the Scope, the DEIR includes the following table which quantifies the land alteration and impervious area associated with each project component in the ACIP:

Year	Project	Type of Activity	Temp Impact	Permanent Impact
2023	**[no construction]**			
2024	**Water / Wastewater Upgrades Sewer Main**	Install line(s) subgrade (below surface) within existing ROW and restore grade [~1,400 LF from existing southerly hanger on Taxilane A to proposed hangars at Taxilane A apron; 1,400x5=7,000 sf= 0.16]	0 [Within existing ***disturbed*** ROW footprint]	0 [Within existing ***disturbed*** ROW footprint]
2025	**Extend Runway 6/24 (351' x 75')** / **Extend Taxiway E/A (700'x35')**	Construction of Runway and Taxiways w/associated stormwater measures; Relocate navaids; and grading	3.78	1.71 [net of -0.89 remove/ restored grassland]
	Gate 3 Taxilane Reconstruction	Reconstruction of existing deteriorated taxilane pavement [~160'x330'=1.2 ac]	0 [Replace In-kind]	0 [Replace In-kind]
2026	**Reconstruction Runway 6/24**	Partial depth (top layers) reconstruct/ rehabilitate of entire runway (excluding 15-33 junction)	0 [Replace In-kind]	0 [Replace In-kind]
	Emergency Generator Airside Infrastructure	Construct 10'x10' concrete pad in existing disturbed area adjacent to flight school	[~<0.05 earthwork/staging; existing ***disturbed*** sand/gravel area]	~0.002 [*de minimus*]
[TBD]	**Hangars – 2 x**	Construct two new GA hangars along Taxilane A utilizing existing apron area; each approximately 100' x 100' (20,000 SF total)	0.40 [earthwork, staging, grading]	0.78
		SUB-TOTAL	**4.18**	**2.49**
		TOTAL IMPACT (TEMP AND PERMANENT)		**6.67**

According to the DEIR, the existing stormwater management at the Airport has evolved as stormwater regulations have changed over time. In the vicinity of the Runway 6 extension project, runoff currently associated with the area feeds into an existing constructed system, consisting of downgradient detention areas and a swale. Much of the land immediately adjacent to the end of Runway 6, Taxiway E, and Taxilane A are treated via overland flow and natural infiltration, without the use of stormwater management structures. Stormwater runoff along South Meadow Road is currently directed to a deep swale, either by overland flow or via catch basins, located along the north side of the Gate 4 taxilane.

In response to the Scope, the DEIR states that any stormwater management system proposed as part of the Project will be designed in accordance with the Massachusetts Stormwater Management Standards (SMS); however, given the current level of conceptual design, specific stormwater measures or other BMPs have not been identified and incorporated into the Project design. The DEIR states that the future Stormwater Report will identify specific measures that will be employed to protect the water quality of the SSA such as vegetative strips, water quality devices, leaching catch basins or infiltration chambers. These measures will be designed to remove at least 80% of the total suspended solids (TSS)

and require the use of oil/water separators as components of the Project are considered Land Uses with Higher Potential Pollutant Loads (LUHPPL) The Airport has committed to utilizing NOAA Atlas 14 precipitation data in designing the devices to provide peak rate attenuation and groundwater recharge. The DEIR states that any infiltration systems proposed will require registration under the MassDEP Underground Injection Control (UIC) program. Information on the stormwater management system design and proposed BMPs should be provided in accordance with the Scope.

Comments provided by the EPA state that given the location of the proposed project above a SSA, it is recommended that that Airport's erosion and sediment control plan, and associated stormwater runoff controls and BMPs include considerations for groundwater resources. Comments also encourage the use of monitoring wells and incorporation of advanced stormwater BMPs (including pretreatment as required by SMS), such as infiltration systems. Additional information should be provided in accordance with the Scope.

Wastewater

As noted above, the Project includes the construction of 3,000 lf of gravity sewer main and associated appurtenances on the southwest side of the Airport. The DEIR states that the additional sewer main is necessary to upgrade substandard systems to meet applicable state design and capacity requirements and to meet existing demand; however, a near-term increase in wastewater flows is not anticipated as a result of the Project. As noted above, the DEIR projects an overall increase in annual operations (based on the estimated annual growth rate of 0.43% used in the TMPU) between 2021 and 2041, which has the potential to increase wastewater flows in the future. The Airport operates its own on-site wastewater treatment plant located to the west of Runway 33. The plant was constructed in 2003 and is permitted under a Groundwater Discharge Permit (GWDP) from MassDEP to operate at a capacity of 25,000 gallons per day (gpd) (Permit No. 720-0); however, the plant currently only treats approximately 5,000 gpd. Therefore, the DEIR indicates that the anticipated increase in flow can be accommodated under the current system without the need to amend the existing GWDP. There are three groundwater monitoring wells in proximity to the leach field that are monitored quarterly for specific conductance, pH, total nitrogen, and nitrate nitrogen. Comments provided by MassDEP state that the sewer main upgrades should be designed in compliance with the NEIWPCC TR-16, Guides for the Design of Wastewater Treatment Works.

Wetlands

As noted above, wetland resource areas are located on and adjacent to the Airport. The potential for direct wetland resource alterations was to be determined pending an analysis by the FAA relative to relocation and realignment of the Gate 6 Access Roadway and perimeter fence line to avoid interference with the runway landing instrumentation and navigational aids. Based on the results of said analysis, the FAA has determined that the perimeter fence will not need to be relocated; therefore, no wetland impacts are anticipated as a result of the Project.

Comments provided by MassDEP state that while the Project is not anticipated to directly alter any wetlands resource areas, according to the DEIR, some of the work may fall within the buffer zone to Bordering Vegetated Wetlands (310 CMR 10.55) and would require a final OOC prior to

commencement. Comments also state that there is an open wetlands variance for work at the Project site and the Project must not conflict with the conditions of the variance.

Rare Species

As noted above, the Airport's grassland habitats support four state-listed grassland-nesting avian species, including the Grasshopper sparrow (*Ammodramus savannarum*), Vesper sparrow (*Pooecetes gramineus*), Upland sandpiper (*Bartramia longicauda*), and Eastern meadowlark (*Sturnella magna*). These species and their habitats are protected pursuant to the Massachusetts Endangered Species Act (M.G.L c. 131A) and its implementing regulations (MESA, 321 CMR 10.00). The Northern long-eared bat (*Myotis septentrionalis*), Plymouth redbelly turtle (*Pseudemys rubriventris bangsi*), and Monarch butterfly (*Danaus plexippus*) are also located on or immediately adjacent to the Airport property and are federally protected pursuant to the U.S. Endangered Species Act (ESA; 50 CFR 17.11). In addition, 11 migratory birds may visit or travel through the area of the Airport property or its vicinity.

According to the DEIR, the Project will impact 6.67 acres of mapped Priority Habitat and will likely result in a Take (321 CMR 10.18 (2)(b)) of state-listed species.[17] Of this area, 2.49 acres (net of pavement removals) will result in a permanent loss of habitat while another 4.18 acres will be temporarily disturbed and restored (with appropriate seed mix). In addition, the Airport proposes a change from infrequently to frequently mown of 3.06 acres. Impacts are primarily associated with the extension of Runway 6, taxiway extensions, and hangar development. Portions of the Airport are currently managed to maintain habitat for state-listed species in accordance with the provisions of existing MESA CMPs (005-049.DFW, 014-240.DFW, & 018-329). The DEIR states that preliminary consultation with NHESP occurred prior to filing the DEIR and the Airport intends to request a Certificate of Permit Compliance from NHESP. The Airport will continue coordination with NHESP regarding amendments and renewal of the existing MESA CMP (018-329). In addition, as part of the mitigation efforts, the Airport proposes to update the existing Airport-wide Grassland Habitat Management Plan (GHMP). To compensate for the Project's unavoidable alteration of Priority Habitat, the Airport proposes to place additional Airport property under management to improve the land's habitat functions for the state-listed species that occur on the site, as it has done for prior projects.[18]

Comments provided by NHESP note that the Airport has started the consultation process on a pre-filing basis and intends to meet the performance standards of a CMP. NHESP anticipates that a suitable long-term net benefit could be achieved through the protection of suitable, high-quality habitat, or management of habitat; therefore, NHESP anticipates that Project should be able to meet the performance standards of a CMP. However, NHESP has not determined whether the existing CMP will be amended or if a new CMP will be required. Comments further state that the Airport should continue proactive consultations with NHESP to identify the components of a long-term net benefit for state-listed species in advance of filing the FEIR. In addition, the Airport should demonstrate compliance with the existing CMP(s) and request a Certificate of Permit Compliance from NHESP, as appropriate. This information should be provided in the FEIR.

[17] This represents a decrease of 0.37 acres from the ENF.

[18] The DEIR states that the Airport maintains land in a "mitigation bank" and intends to utilize a portion of that land to meet the performance standards for a CMP, along with other best management practices and modifications to the existing CMP, in consultation with NHESP. Further details should be provided in the FEIR.

Climate Change

Adaptation and Resiliency

As noted above, given the current level of conceptual design, specific stormwater measures or other BMPs have not been identified and incorporated into the Project design. Therefore, the DEIR does not provide an evaluation of whether the stormwater management system is resilient to future climate conditions. However, the Airport has committed to utilizing NOAA Atlas 14 precipitation data in designing the devices to provide peak rate attenuation and groundwater recharge. In addition, the DEIR states that the future Stormwater Report will identify specific measures that will be employed to protect the water quality of the SSA such as vegetative strips, water quality devices, leaching catch basins or infiltration chambers. The FEIR should include a comprehensive discussion of the proposed stormwater management system and an evaluation of whether the system is resilient to future climate conditions in accordance with the Scope.

According to the DEIR, the FEMA Flood Insurance Rate Maps (FIRMs) in the vicinity of the Airport were most recently updated in 2021 (FIRM panels 25023C0361K, 25023C0362K, 25023C0363K, and 25023C0364K, effective 7/2021). Based on the FEMA FIRMs, a portion of Runway 15-33 is mapped as a Zone A without an established Base Flood Elevation. However, there are no other mapped floodplains within areas where the project components of the Project will be implemented. In addition, no fill or structures are proposed within a mapped floodplain.

Greenhouse Gas (GHG) Emissions

According to the DEIR, the Project is not anticipated to substantially increase the number of aircraft using the Airport and resulting air emissions are expected to remain well within the NAAQS. The DEIR does project a minimal forecasted increase in operations over the next twenty years, namely, an increase of four flight operations/day every 5 years for a total of 16 additional operations/day by 2041. The DEIR indicates that is partially attributable to increases in business aviation as passengers unable to travel to their destinations utilizing commercial airlines during the pandemic continue to shift to corporate jet travel. In addition, while the Project does not include Airport vehicle additions, it does include a new emergency generator and airside infrastructure. The DEIR indicates that overall GHG emissions from Airport activity are projected to decline by 2041, based on a combination of factors, including the introduction of electric aircraft; phasing out of older aircraft with reduced emissions and quieter systems; and continued efforts by the FAA to make aviation cleaner, quieter, and more sustainable. In addition, the Airport is committed to curbing GHG emissions through various strategies, as funding, construction phasing, and other factors allow. In particular, the Airport has committed to the following:

- The integration of low-cost energy efficiency measures;
- The installation of low-energy use lighting;
- Design mechanical, electrical and plumbing systems to minimize operating costs while providing the highest level of control over interior building environments (e.g., hangars);
- Climate change resilient design of the proposed hangars (for areas under Airport control); and
- Reduce energy consumption by monitoring the efficiency of heating, ventilation, and cooling systems.

Solid and Hazardous Waste

According to the DEIR, proposed construction activities are anticipated to generate solid waste predominantly as a result of earth moving operations, with demolition waste primarily consisting of asphalt. The DEIR states that any solid waste generated during Project implementation, including construction waste, will be recycled to the extent feasible and/or disposed of appropriately in accordance with federal, state, and local regulations addressing such materials.

The DEIR states that the Airport currently uses a variety of hazardous or potentially toxic materials, such as vehicle and aviation fuels and solvents, which could be released to the environment in the event of a spill, aircraft crash, or ground support equipment accident. The Airport maintains a Spill Prevention Control and Countermeasures (SPCC) Plan that establishes procedures for handling these substances and that addresses prevention and management of potential releases of oil and/or hazardous materials. In particular, aircraft fuel storage and refueling areas are limited to the apron areas on the northern side of the Airport near South Meadow Road. In addition, the DEIR states that no chemicals or salt are used on the runways, taxiways, or aprons, and the Airport's Stormwater Pollution Prevention Plan (SWPPP) prohibits the use of deicing chemicals on aircraft which are deiced by heat in hangers instead.

In accordance with the Scope, the DEIR evaluated the potential excavation or disturbance of previously contaminated soils as a result of Project implementation. Based on a review of the MassDEP reportable release database, there are no releases reported within 300 ft of any of the proposed project areas. However, one closed disposal site, regulated under MGL c 21E, and the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) is located on the Airport property and upgradient of the Runway 6 project area. The historic release (RTN 4-0026005) was due to a plane crash in February 2016 that resulted in the sudden release of approximately 25 gallons of aviation fuel. The release impacted surficial soils, but groundwater and surface water impacts were not observed. The impacted soil was removed, and the site achieved a Permanent Solution with No Conditions under the MCP. The DEIR states that no hazardous material is anticipated to be generated from Project construction.

Comments provided by the EPA state that in assessing the potential for impacts to the SSA resulting from the Project, the Airport should provide a list of chemicals used at the airport, and a description of where and how they will be stored and managed on airport property. A full discussion of aircraft or vehicle maintenance practices/activities that can pollute runoff along with measures that will be implemented to reduce and control pollutants should also be provided. In addition,

Construction Period

According to the DEIR, grading associated with runway, taxiway, taxilane, and hangar construction has the potential to cause short-term erosion and sedimentation in the vicinity of sensitive areas. Erosion and sedimentation control measured will be implemented throughout the construction area and in advance of ground disturbing activities. The existing gravel maintenance access road will be used for construction access to the extent feasible. As discussed above, there could be a temporary increase in heavy truck traffic on local roads of up to nine adt for diesel dump trucks over the course of the construction period. Construction activity may also result in temporary, short-term adverse impacts on ambient air quality, primarily in the area immediately adjacent to the area of disturbance resulting

from fugitive dust and construction equipment emissions. The DEIR states that temporary construction period impacts will be mitigated to the extent feasible by:

- Encouraging contractors to use EPA Tier 4 construction equipment or equipment retrofitted with diesel emission control devices to the greatest extent practicable;
- Using Ultra-Low Sulphur Diesel for all trucks and construction machinery;
- The use of after-engine emissions controls, such as oxidation catalysts or diesel particulate filters;
- Maintaining an "idle free" work area;
- Revegetating disturbed areas as soon as possible after disturbance; and
- Minimizing exposed storage of debris on-site through measures such as wetting soils prior to disturbing and covering stockpiles.

The DEIR states that all construction activities will be managed in accordance with applicable MassDEP regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017), and other applicable regulations. As noted above, solid waste generated during Project construction will be reused and recycled as appropriate. Any asphalt, brick, or concrete (ABC) rubble associated with the Project must be handled in accordance with the MassDEP Solid Waste regulations and the reuse of any materials requires the submittal of a MassDEP BWP SW41 – Beneficial Use Determination. Any remaining waste construction materials will be disposed of in accordance with state and local regulations. The Project will comply with the Solid Waste Regulations, including 310 CMR 19.017: Waste Ban, which prohibit the disposal, transfer for disposal, or contracting for disposal of certain hazardous, recyclable, or compostable items. In addition, tree removal related to land clearing, and handling/processing of clean wood, will be handled according to state regulations, including 310 CMR 16.00 and 310 CMR 19.00. The DEIR states that no wood will be buried or disposed of at the site unless otherwise approved by MassDEP.

SCOPE

General

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content, and include the information and analyses identified in this Scope. It should clearly demonstrate that the Proponent has sought to avoid, minimize, and mitigate Damage to the Environment to the maximum extent feasible.

Project Description and Permitting

The FEIR should describe any changes to the Project since the filing of the DEIR. The FEIR should identify, describe, and assess the environmental impacts of any changes to the Project that have occurred between the preparation of the DEIR and FEIR. The FEIR should also include an updated list of required Permits, Financial Assistance, and other state, local and federal approvals and provide an update on the status of each of these pending actions. The FEIR should also describe a mechanism for

conducting more detailed reviews of future projects through the filing of NPCs.

The FEIR should include plans of existing and proposed conditions at a legible scale that identify all major Project components (existing and proposed buildings, access roadways, runways, taxiways, etc.), public areas, impervious areas, subsurface utilities, surface elevations, wetland resource areas, rare species habitat, ownership of parcels including easements, and stormwater and utility infrastructure. Conceptual plans should be provided for on-site work as well as any proposed off-site work for transportation or utility improvements that will benefit the Project.

The information and analyses identified in this Scope should be addressed within the main body of the FEIR and not in appendices. In general, appendices should be used only to provide raw data, such as drainage calculations and TSS removal rates, that are otherwise adequately summarized with text, tables, and figures within the main body of the FEIR. Information provided in appendices should be indexed with page numbers and separated by tabs, or, if provided in electronic format, include links to individual sections. Any references in the FEIR to materials provided in an appendix should include specific page numbers to facilitate review.

The FEIR should clarify whether the Project itself is anticipated to, directly or indirectly, result in an increase in Airport operations and associated increase in airplane to jet activity. If so, the FEIR should explain the methodology used to quantify the projected increase in Airport operations. The FEIR should provide updated air quality, noise, and GHG emissions analyses that account for the forecasted increase in Airport operations. The FEIR should include all impacts associated with activities asserted to qualify as "Replacement Project" and "Routine Maintenance" work for which no advisory ruling has been issued by the MEPA Office.

Alternatives Analysis

The FEIR should provide an alternatives analysis for all major components of the Project. In particular, the FEIR should identify any alternative configurations or locations for the two proposed hangars that would avoid or minimize impacts to land alteration and impervious area. The FEIR should also explore alternative locations and lengths for the sewer main expansion. The alternatives analysis and project narrative should support the selection of the Preferred Alternative that includes all feasible measures to avoid Damage to the Environment, or to the extent Damage to the Environment cannot be avoided, to minimize and mitigate Damage to the Environment to the maximum extent practicable.

Environmental Justice (EJ)

The FEIR, or a summary thereof, should be distributed to the EJ Reference List that was used to provide notice of the DEIR. The Proponent should obtain a revised EJ Reference List from the MEPA Office to ensure that contact information is updated. The same efforts to notice the Project should be made prior to the submission of the FEIR. The FEIR should provide an update on any outreach conducted since the filing of the DEIR, and identify any changes made to the Project design in response to this outreach.

Consistent with the Scope related to Climate Change and Land Alteration below, analysis of the stormwater management system should assess whether flooding risks may be exacerbated for nearby EJ

Populations, including under future climate conditions, and whether existing conditions would be worsened or improved by the Project design. The FEIR should update analyses related to air emissions and noise to account for the increase in airplane activity that is anticipated from the proposed hangar expansion or other work that may result in an increase in Airport capacity. As discussed below, the FEIR should contain a comprehensive discussion of whether the proposed sewer main upgrades will lead to an increase in flows to the wastewater treatment facility on site or to the groundwater discharge locations, and provide all the information contained in the EPA comment letter as to anticipated impacts to groundwater and the SSA, including from stormwater, associated with the Project. The FEIR should assess whether any increase in pollutant loading in groundwater is anticipated to impact the identified EJ Population based on the results of groundwater modeling or other analysis.

Public Health / Sole Source Aquifer (SSA)

As requested in the EPA letter, the FEIR should include a plan showing groundwater depth, contours, and flow directions to better describe the context, existing location and subsurface environment for areas potentially affected by the Project. The plan should detail the location of existing and proposed monitoring wells, public and private water supply wells, and surface water supply sources within five miles of the Project. The plan should be accompanied by a narrative to explain how groundwater contours were developed. The FEIR should provide additional hydrogeologic information as it relates to the flow of potential contaminants from the proposed Project, including from increased wastewater flows, stormwater discharges, and construction activities, and the potential impact, including groundwater flow continuing off-site, to existing or proposed public or private water supplies. Distances and time of travel (if times are readily available) to nearest water supplies should also be provided.

The FEIR should include a list describing the expected annual loading of potential contaminants of groundwater (as compared to baseline conditions at the Airport) from construction and Project-related operations including information on fuel-related contaminants and loadings such as volatile organic compounds, metals, and polyaromatic hydrocarbons. The FEIR should provide a description of any past contamination events at the airport along with baseline groundwater contaminant conditions. The FEIR should also include an expanded description of measures and best management practices to reduce the release of contaminants and provide aquifer protection during construction and airport operations, with a specific focus on how the Airport will protect groundwater from contaminated runoff, spills, or accidents at the airport.

The FEIR should include a monitoring plan that describes how and when soil and groundwater will be monitored for potential contaminants of concern and how baseline soil and groundwater contaminant conditions will be established. The monitoring plan should detail the frequency of sampling and how the sampling results, along with needed and executed response actions, will be shared with appropriate water department officials in the project area.

Land Alteration, Impervious Surfaces, and Stormwater

The FEIR should provide a copy of the Stormwater Report for the Project which identifies all measures that will be employed to protect the water quality of the SSA, describes the proposed stormwater management system for each project/phase of the Project, and identifies BMPs that will be incorporated into its design. The FEIR should describe how the proposed stormwater management

system will fully comply with the SMS. The Airport should take all feasible measures to manage stormwater runoff, including by exceeding stormwater management standards and incorporating Low Impact Design (LID) strategies and green infrastructure wherever practicable; such measures should be described in the FEIR. Green infrastructure is an effective way to treat stormwater generated by impervious surfaces and provide cooling and other benefits for the community and should be incorporated to the maximum extent possible. LID designs should be carefully considered, and where not used, the FEIR should provide a thoughtful explanation as to why they are infeasible for implementation on-site. The FEIR should identify any infiltration systems that may require registration under MassDEP's Underground Injection Control (UIC) program. Additionally, the FEIR should identify how the stormwater management system will conform to the guidelines and performance standards related to discharges of pollutants from airplane deicing operations and other discharges covered by the NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). To the extent the Stormwater Report has been prepared by the time the FEIR is submitted, a copy should be provided with the FEIR.

As described further below, the FEIR should discuss how the stormwater management system will be designed to accommodate larger storm events. The FEIR should consult the rainfall volumes that are provided by the MA Resilience Design Tool as indicative of future climate conditions, and describe how the Project will consider future conditions in design. The FEIR should include a plan showing the location of BMPs, and describe whether sufficient space is being provided to allow for future retrofits as needed to accommodate large storms.

Wastewater

As noted, the Project proposes a sewer main extension in order to upgrade substandard systems to meet applicable state design and capacity requirements and to meet existing demand. The FEIR should clarify whether increased wastewater flows are anticipated as a result of the sewer main expansion and if so what is the primary cause.

Climate Change

Adaptation and Resiliency

The DEIR should describe the precipitation data used for the design of the stormwater management system and how the system will be sized to address future climate conditions. The MA Resilience Design Tool provides rainfall volumes associated with a 24-hour storm for the Project as input by the user. The DEIR should discuss whether the proposed stormwater design is anticipated to meet the recommended 2050 10-year return period (24-hour rainfall volume of 6.1") from the MA Resilience Design Tool for the runway extension, as well as the 2070 recommendation for the aviation hangars corresponding to a 25-year return period as of 2070 (24-hour rainfall volume of 7.9"). Estimates can be provided in lieu of exact calculations, to the extent stormwater design is not advanced enough by the time of the DEIR. To the extent the Project is unable to accommodate future year storm scenarios, the DEIR should discuss whether the Project has engaged in flexible adaptative strategies, and whether current designs allow for future upgrades to be made to adapt to climate change.

Solid and Hazardous Waste

As requested in the EPA letter, the FEIR should provide a list of chemicals used at the airport, and a description of where and how they will be stored and managed on airport property. The list should be accompanied by a discussion of aircraft or vehicle maintenance practices/activities that can pollute runoff along with measures that will be implemented to reduce and control pollutants.

Mitigation and Draft Section 61 Findings

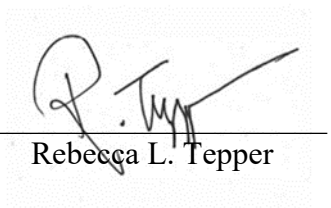
The FEIR should include a separate chapter summarizing all proposed mitigation measures including construction-period measures. This chapter should also include a comprehensive list of all commitments made by the Proponent to avoid, minimize, and mitigate the environmental and related public health impacts of the Project, and should include a separate section outlining mitigation commitments relative to EJ populations. The filing should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The list of commitments should be provided in a tabular format organized by subject matter (traffic, water/wastewater, GHG, environmental justice, etc.) and identify the Agency Action or Permit associated with each category of impact. Draft Section 61 Findings should be separately included for each Agency Action to be taken on the Project. The filing should clearly indicate which mitigation measures will be constructed or implemented based upon Project phasing to ensure that adequate measures are in place to mitigate impacts associated with each development phase.

Responses to Comments

The FEIR should contain a copy of this Certificate and a copy of each comment letter received. To ensure that the issues raised by commenters are addressed, the FEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the FEIR beyond what has been expressly identified in this certificate.

Circulation

In accordance with 301 CMR 11.16(3), the Proponent should circulate the FEIR to those parties who commented on the DEIR, each Agency from which the Project will seek Permits, Land Transfers or Financial Assistance, and to any other Agency or Person identified in the Scope. Per 301 CMR 11.16(5), the Proponent may circulate copies of the FEIR to commenters in CD-ROM format, by directing commenters to a Project website address, or electronically. However, the Proponent must make a reasonable number of hard copies available to accommodate those without convenient access to a computer and distribute these upon request on a first-come, first-served basis. A copy of the FEIR should be made available for review in the Plymouth and Carver Public Library.



January 16, 2024
Date

Rebecca L. Tepper

Comments received:

95 comment letters beginning with "I urge you to rule that the Airport's Draft Environmental Impact Report (DEIR)…"

11/28/2023	Margaret Ferguson
12/1/2023	Natural Heritage and Endangered Species Program (NHESP)
12/14/2023	David Sanford
1/7/2024	Sharon Racette
1/8/2024	Pine duBois
1/8/2024	Jennifer Hanlon
1/8/2024	Community Land & Water Coalition, Carver Concerned Citizens, Save Massachusetts Forests, and RESTORE: The North Woods
1/8/2024	U.S. Environmental Protection Agency (EPA)
1/8/2024	Massachusetts Department of Environmental Protection (MassDEP) Southeast Regional Office (SERO)
1/9/2024	Ellen Sturtevant
1/12/2024	Steven Lantagne
1/12/2024	Julia Maguire
1/15/2024	Pamela Large Glasgow
1/16/2024	Christina Sheehan

RLT/NJM/njm

Example of 95 comment letters beginning with “I urge you to rule that the Airport’s Draft Environmental Impact Report (DEIR)…”

The DEIR and EA for the Plymouth Airport Expansion Are Inadequate

Al Maze <info@email.actionnetwork.org>

Mon 11/27/2023 2:41 PM

To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

Dear state and federal officials:

I urge you to rule that the Airport’s Draft Environmental Impact Report (DEIR) and Environmental Assessment (EA) are inadequate and do not meet legal standards.

Generally, the DEIR lacks a stand-alone, nontechnical description and analysis of the Project and its alternatives, and lacks an adequate assessment of its potential environmental impacts and mitigation measures. For example, it has multiple pages of acronyms and refers to documents that are not explained or included in the Appendix. This violates 301 Code of Massachusetts Regulations Section 10.07(4). It fails to consider the Airport’s plan to “support future growth of airport operations” and what that means for abutting neighborhoods and wildlife habitat.

The specific defects in the DEIR and EA include failure to adequately consider the topics below.

Existing Environment
The DEIR does not adequately describe the “Existing Environment,” in violation of 301 Code of Massachusetts Regulations 11.07(6)(g). It ignores the rapid, unregulated changes in topography in the surrounding area caused by sand and gravel mining operations around the Airport. These operations have the potential to change the flow of water above and below ground. They increase the potential contamination of the underground drinking water aquifer by removing the natural filtration provided by trees, vegetation and sand and gravel. The ongoing forest clear-cutting on the Airport Site also potentially impacts groundwater quality. The DEIR does not contain an analysis of geology and soils and does not describe surrounding land alterations, including earth removal.

The DEIR does not describe the role of the adjacent Myles Standish State Forest in supporting wildlife and public recreation, the benefits of this contiguous open space, and how it will be impacted.

Drinking water: federally designated Sole Source Aquifer
A major flaw in the DEIR is the failure to consider the likely impacts, direct or indirect, to the Plymouth Carver Aquifer, a sole source drinking water aquifer designated under the Safe Drinking Water Act. See, 301 Code of Massachusetts Regulations, Section 11.06

The DEIR states that the Plymouth Carver Aquifer “is considered a Resource Not Affected and is dismissed from further consideration.” DEIR section 4.2. This is unsupported by scientific evidence.

The Town’s 2019 water supply master plan states the Airport “is located adjacent to the Zone II area [protection area] for the Federal Furnace Well and could be a potential source for per and polyfluoroalkyl substances (PFAS).” PFAS is a chemical that causes health problems, including cancer. The Town’s report states the Town should be doing more to protect the drinking water aquifer. It states, “Considering how susceptible the [Town’s drinking water] sources are to contamination; it is recommended that a more stringent groundwater protection district be developed.” The Town consistently ignores this warning from its own master plan. The Town has recently allowed major industrial and commercial projects to be built in and immediately adjacent to aquifer protection districts including in West Plymouth where the Airport is located. It is allowing sand and gravel operations in and near aquifer protection districts, including car dealerships, a car wash, and an automotive service center that discharges runoff to the groundwater. The DEIR must include a hydrological study of groundwater flow and water quality sampling.

The Airport discharges stormwater runoff to the drinking water aquifer via stormwater basins. Additional stormwater will be discharged with the expansion. There is no evidence in the DEIR that the Airport has properly operated and maintained the on-site stormwater runoff system.

Wildlife and Wildlife Habitat

The DEIR’s description of the impacts to wildlife and wildlife habitat is incomprehensible, confusing and not provided in nontechnical language. It refers to multiple past permits, plans and ongoing activities allegedly authorized by the Natural Heritage and Endangered Species Program (NHESP) for the Site. It fails to include the permits, plans and reports in the Appendix. It does not provide an adequate description of how the Massachusetts Endangered Species Act (MESA) works, what Priority Habitat is for each of the species and does not adequately explain the alleged mitigation for the elimination of acres of wildlife habitat. It does not have an adequate history of how the Airport has impacted wildlife and wildlife habitat including species protected under MESA and the federal Endangered Species Act (ESA). The DEIR’s conclusion that no Biological Opinion is needed under NEPA and the federal ESA is erroneous.

Air pollution

The DEIR uses an air station in Boston to conclude that air pollution is not a problem. The DEIR does not contain adequate information about the types of air pollution emitted by the current planes using the Airport, how far the pollutants travel to adjacent homes and businesses, and how air pollution will be increased by climate change and warming temperatures. It does not describe the specific air pollutants that will be emitted by the “future growth of airport expansions” and the increased use of Falcon 200 Jets. The DEIR is clear that the Airport plans to expand long term to add more jet traffic to the Airport. It is adding new hangars “to attract new businesses.” The Airport must test current air pollution near the Airport and guarantee that the fumes from the Airport are not harming people now or in the future.

Noise and Light Pollution

The DEIR does not measure current noise impacts in nearby homes and neighborhoods. It does not state how noise specifically will increase in the future as a result of the Airport’s long term

plan to add more jet traffic and expand airport operations. Residents report that the Airport violates its hours of operation causing unpermitted noise pollution. The DEIR does not adequately address light pollution.

Environmental Justice Impacts
The DEIR claims many of the impacts on nearby communities are merely “temporary” during the construction period. This is not supported by objective evidence.

The DEIR claims that the Airport expansion benefits the Environmental Justice communities in various ways. This includes “benefits” from “improved safety and efficiency, construction jobs and economic enhancement.” The claims of economic benefits are not credible or supported by any evidence. In particular, the Environmental Justice communities include over-age 55 residents in mobile home parks. There is no evidence that these residents will be provided with construction jobs or gain any economic benefit from the Airport expansion. Will over-age 55 residents be working at construction jobs at the Airport during the temporary construction period?

Indigenous Rights of Native Americans
The DEIR fails to document proper consultation under the National Historic Preservation Act, Section 106, fails to document consultation with Herring Pond Wampanoag Tribe of Plymouth, and fails to provide an adequate opportunity for Native Americans to participate in the process.

For these reasons, I request that you find that the DEIR does not adequately comply with the May 26, 2023 MEPA Certificate # 16692 or with the MEPA statute and regulations at 301 CMR. 11.00
*****

Al Maze
atimeinboston@gmail.com
7 Sandwich Road
Plymouth, Massachusetts 02360

The DEIR and EA for the Plymouth Airport Expansion Are Inadequate

Margaret Ferguson <info@email.actionnetwork.org>

Tue 11/28/2023 8:18 PM

To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

Dear state and federal officials:

I urge you to rule that the Airport's Draft Environmental Impact Report (DEIR) and Environmental Assessment (EA) are inadequate and do not meet legal standards.

Taxpayer dollars should be invested in public transit and our shared future instead.

Thank you,
Margaret Ferguson

Margaret Ferguson
magtferguson@gmail.com
67A Dana Street #1A
Cambridge, Massachusetts

MASSWILDLIFE

DIVISION OF
FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

December 1, 2023

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Nicolas Moreno, EEA No. 16692
100 Cambridge Street
Boston, Massachusetts 02114

Project Name:	*Plymouth Municipal Airport Runway 6 Extension*
Proponent:	*Plymouth Airport Commission*
Location:	*South Meadow Road, Plymouth Municipal Airport*
Project Description:	*Extend Runway 6 and parallel taxiway (E) by 351 feet*
Document Reviewed:	*Draft Environmental Impact Report*
EEA File Number:	*16692*
NHESP Tracking No.:	*23-1142*

Dear Secretary Tepper:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) reviewed the *Draft Environmental Impact Report* (DEIR) for the Plymouth Municipal Airport Runway 6 Extension Project located in Plymouth, MA and would like to offer the following comments.

Plymouth Municipal Airport's grassland habitats support four (4) state-listed grassland-nesting avian species. These species and their habitats are protected pursuant to the Massachusetts Endangered Species Act (M.G.L c. 131A) and its implementing regulations (MESA, 321 CMR 10.00). Portions of Plymouth Airport are currently managed to maintain habitat for state-listed species in accordance with the provisions of the MESA Conservation and Management Permits (005-049.DFW, 014-240.DFW, & 018-329).

All projects that will occur within *Priority and Estimated Habitat* for state-listed species, which are not otherwise exempt from MESA review pursuant to 321 CMR 10.14, require a direct filing with the Division for compliance with the Massachusetts Endangered Species Act (MESA 321 CMR 10.00). The Proponent has initiated pre-filing consultation with the Division concerning the proposed Runway 6 Extension Project. Although a formal MESA filing has not yet been submitted, the Division anticipates – based on previously submitted information and consultations with the Proponent – that the Runway 6 Extension Project, as proposed, will likely result in a Take (321 CMR 10.18 (2)(b)) of state-listed species.

Projects resulting in a Take of state-listed species may only be permitted if the performance standards for a Conservation and Management Permit (CMP; 321 CMR 10.23) are met. For a project to qualify for a CMP, the applicant must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that

an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species.

It is our understanding that the Proponent intends to meet the performance standards of a CMP. The Proponent should continue proactive consultations with the Division to identify the components of a long-term net benefit for state-listed species in advance of the FEIR. The Division anticipates that a suitable long-term net benefit could be achieved through the protection of suitable, high-quality habitat, or management of habitat; therefore, the Division anticipates that project should be able to meet the performance standards of a CMP. At this time, the Division has not determined whether the existing CMP will be amended or if a new CMP will be required. The Proponent should demonstrate compliance with the existing CMP(s) and request a Certificate of Permit Compliance from the Division, as appropriate.

Division will not render a final decision until the MEPA review process and associated public and agency comment period is completed, and until all required MESA filing materials are submitted by the proponent to the Division. As our MESA review is not complete, no alteration to the soil, surface, or vegetation and no work associated with the proposed project shall occur on the property until the Division has made a final determination.

If you have any questions about this letter, please contact Amy Hoenig, Endangered Species Review Biologist, at (508) 389-6364 or Amy.Hoenig@mass.gov. We appreciate the opportunity to comment on this project.

Sincerely,

Everose Schlüter

Everose Schlüter, Ph.D.
Assistant Director

cc: Alyssa Jacobs, Epsilon Associates
Nathan Rawding, Epsilon Associates
Brenda Bhatti, Dubois-King
Plymouth Municipal Airport
Plymouth Board of Selectmen
Plymouth Conservation Commission
Plymouth Planning Department
DEP Southeast Regional Office, MEPA

Plymouth Airport Expansion

David Sanford <noreply@adv.actionnetwork.org>

Thu 12/14/2023 11:05 PM

To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

Dear state and federal officials:

I urge you to support the Plymouth Airport Expansion.

Longer runways will improve aviation safety margins and create economic opportunities in the Plymouth and Carver area by providing the additional jobs related to the expansion of the airport and the additional aircraft that longer runways will support.

The airport predates all of the residents of the area who purchased their nearby homes knowing full well that they were neighbors to an airport. Just as people who purchase homes next to a large agricultural operation need to tolerate the sounds, sights and smells of a farming operation, so too do neighbors of an airport need to tolerate the overflights and sounds of their neighbors. Should we ban all non residential activities everywhere? And what about large residential developments? Should we ban those as well due to increased traffic and demands on water and sewer? Let's just ban everything. Perhaps there is a rare species of grass that we need to protect that is unique to a given area and maybe that species of grass will hold the key to the cure for cancer.

Then again, maybe not.

Plymouth Airport's runways are presently 4,600 feet long. Another 400 feet is a perfectly reasonable request. Please support it.

Thanks
David Sanford

David Sanford
sanfordave@verizon.net
41 East Main St
Middleboro, Massachusetts 02346

The DEIR and EA for the Plymouth Airport Expansion Are Inadequate

Sharon Racette <sracette@comcast.net>

Sun 1/7/2024 6:30 PM

To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

I have been to the last three Plymouth Airport Commission meetings. I live at 395 Federal Furnace Road on Big West Pond in Plymouth, and my son has his optometry practice at 212 South Meadow Road right next to the airport runway where the airplanes taxi. So this is a very important issue and very heavy on our hearts.

I work at my son's office regularly, and when I go out to run errands, it's very common to taste fumes in my mouth, and when I open up the car to get in, I still smell fumes even with the doors closed. This situation is dealable right now, but any change will make this area less inhabitable.

Three daycare centers, two large over-55 communities, Carver High School, and many other businesses already deal with the strong fume smells. Making all the small planes obsolete to just bring in larger planes is detrimental to the whole area.

I could go on and on, but the bottom line is the proposed airport expanision will only bring down West Plymouth. There will be more noise, there will be more fumes, there will be more vibrations. People wanting to camp at nearby Ellis Haven will have to deal with large noisy jets flying overhead never mind the residents who live nearby.

Another very important issue is the fact that cancer-causing chemicals have already been found in the Federal Furnace Well. Do we really want to add to that?

My last statement is anybody that is trying to push this project through, please search your hearts and your consciences to discern whether really this is right for the citizens of this area. If there was a lot more land around the airport, I could see this working out, but there is not. There are too many residential homes, campsites, daycares, Carver High School, over-55 communities, and other businesses that would be subjected to excessive noise and toxins, in sum, a lower quality of life. We urge you not to let this expansion proceed as this certainly will negatively affect thousands of people emotionally, physically, and financially. Thank you for taking the time to hear our concerns. We hope you do the right thing.

Regards,
Sharon Racette
395 Federal Furnace Road
Plymouth, MA 02360

Sharon Racette
sracette@comcast.net
395 Federal Furnae Road
Plymouth, Massachusetts 02360

Plymouth Airport Expansion Comment

Pine duBois <pine@jonesriver.org>
Mon 1/8/2024 5:44 PM
To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

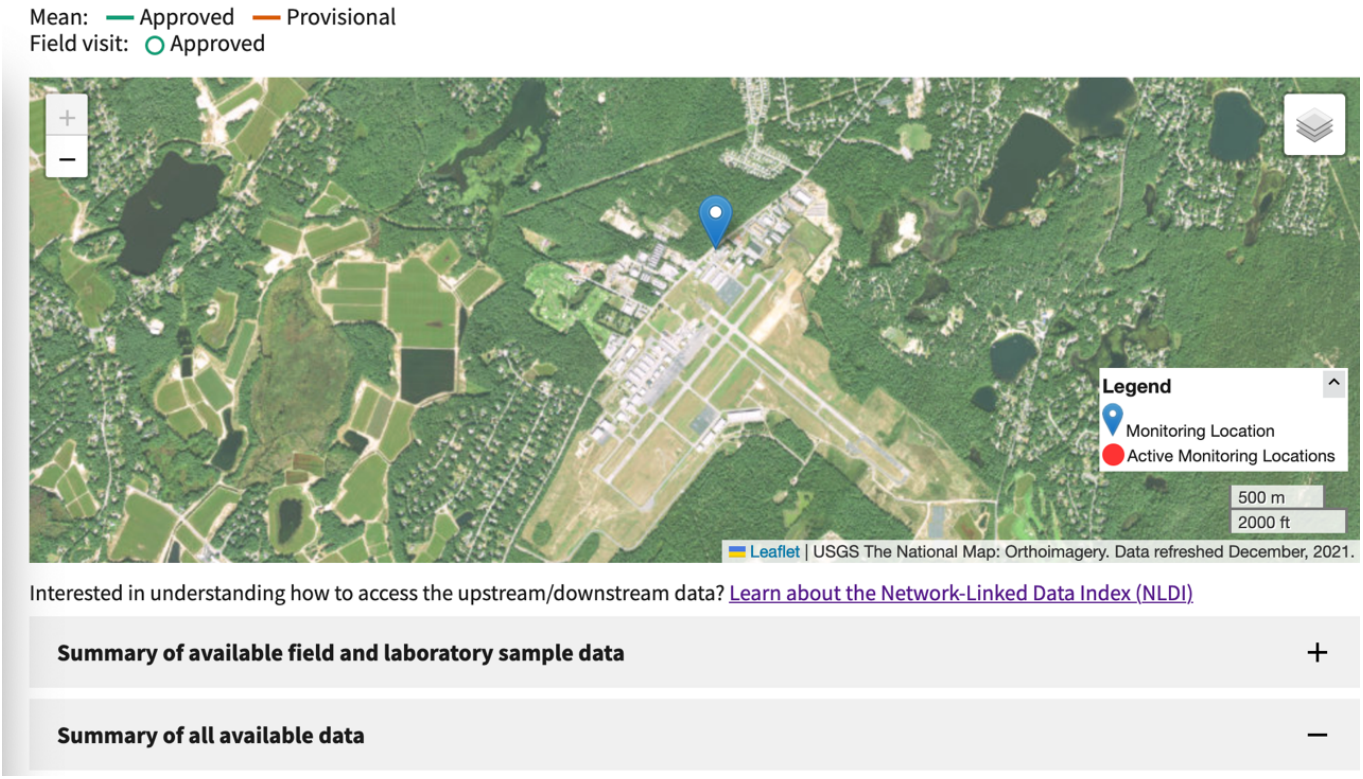
Dear Mr Moreno,

Please consider the following comments relative to the Plymouth Airport Expansion DEIR and EA,

My time was short so these comments are limited to a few concerns. In out role monitoring Jones River in Kingston, almost daily we check the USGS gauge for the river, which is the northern boundary for the Plymouth-Carver Sole Source Aquifer (PCA). We also routinely will check the USGS monitoring wells in the area, in particular the one located immediately adjacent to the Plymouth Airport. Despite the reference in the DEIR that the well was established in 2014, it was brought online in 1956 and is an important National reference station. In general, what I was able to get though in the MEPA filings, the application dismisses groundwater as an important resource of the Commonwealth. This is ridiculous, especially within the eight towns that rely on the PCA for all public water needs. There are several activities existing and being proposed that will impact this resource including:

SOLID AND HAZARDOUS WASTE:
If the project will generate solid waste during demolition or construction, describe alternatives considered
for re-use, recycling, and disposal of, e.g., asphalt, brick, concrete, gypsum, metal, wood:
The primary demolition waste associated with the Runway 6 end extension will be asphalt, which will be
reused on site where feasible. Construction procedures will allow for the segregation, reuse, and recycling of materials.

I did not see how much asphalt will be imported to the site, but I am very adverse to asphalt being used, let alone recycled over the drinking water supply. I read that the Airport currently has 3 groundwater monitoring locations, but did not see any info on those other than the consultant's claim that the only one that shows any degradation of quality is under the leaching field for the wastewater discharge, which is to be expected. In my opinion the regional impact of bringing more recreational and business aircraft to the area requires additional monitoring of groundwater wells. That the PCA is not considered an ORW is a fault of the regulatory framework, and makes no sense when thinking of protecting essential natural resources. No one in the southeast region can live without good quality groundwater, and it is degrading fast already.



The above screenshot pins the location of the USGS monitoring well on South Meadow Rd. There is another one in Myles Standish State Forest to the southeast. A mitigation for this project would be to add water quality monitoring for each of these two wells in cooperation with USGS. At the very least better describe the existing monitoring program with data on the wells and a more robust monitoring to assist Plymouth in the care and stewardship of this critical natural resource. Groundwater is most definitely a necessary water of the Commonwealth!

STANDARD 1 – No untreated discharges or erosion to wetlands. Applicants must demonstrate that there are no new untreated discharges. To demonstrate that all new discharges are adequately treated, applicants may rely on the computations required to demonstrate compliance with Standards 4 through 6. No additional computations are required.

The future stormwater management report will identify measures that will be employed to protect the water quality of the sole source aquifer such as vegetative strips, water quality devices, leaching catch basins or infiltration chambers. These devices will remove 80% of total suspended solids as required by DEP.

What is the maintenance standard for pumping and disposal of basins and structures?

 Runway 6 Extension: There are no wetlands proximate to the location of the runway extension, thus there will be no discharge of untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth. Rather, this project will utilize leaching catch basins or underground infiltration chambers to infiltrate any increase in runoff due to increased impervious areas directly into the ground after treatment. Leaching basins and infiltration chambers have been extensively utilized throughout the airport on previous projects

 Hangars/Apron Areas: There are no wetlands proximate to the location of the new

hangars, therefore the hangars and apron areas will not discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.

Rather, the Proposed Action will have the opportunity to utilize leaching basins to dispose of runoff. Leaching basins and infiltration chambers have been used elsewhere on the airport as areas are reconstructed or developed (see Runway 33, Taxiway D prior projects).

All water runoff that will “leach" into the ground will impact waters of the Commonwealth

STANDARD 2 - Stormwater management systems shall be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates.

During the design of the project, the Proponent will model the stormwater runoff for the Project Area in accordance with the requirements of the Massachusetts Stormwater Handbook. The handbook requires projects to model the 2-year, 10-year and 100-year storms utilizing the TR-20/TR-55 methodologies for a 24-hour rain event. The rainfall data has historically been for a Type II storm as defined by the NRCS. However, NOAA Atlas 14 rainfall data has replaced the former NRCS data as an industry standard, and will be utilized on the proposed project.

Methods available to manage increased post development runoff include infiltration devices such as leaching basins and/or underground chamber systems or below ground detention basins.

STANDARD 3 – Loss of annual recharge to groundwater shall be eliminated or minimized through the use of infiltration measures including environmentally sensitive site design, low impact development techniques, stormwater best management practices and good operation and maintenance. At a minimum, the annual recharge from the post development site shall approximate the annual recharge from the pre-development conditions based on soil type. This Standard is met when the stormwater management system is designed to infiltrate the required recharge volume as determined in accordance with the Massachusetts Stormwater Handbook.

There will be no loss of annual recharge to groundwater due to new taxiway pavement because future design will include using leaching basins and infiltration chambers. The stormwater management report will identify new pavement/impervious areas and pavement removal for each of the Projects. New impervious areas will be minimized to the maximum extent practicable while adhering to FAA guidelines. All infiltration systems will require registration under the MassDEP Underground Injection Control (UIC) program.

are identified in a long-term pollution prevention plan and thereafter are implemented and maintained; (b) Structural stormwater best management practices are sized to capture the required water quality volume determined in accordance with Massachusetts Stormwater Handbook; and (c) Pretreatment is provided in accordance with the Massachusetts Stormwater Handbook.

TSS removal can be accomplished by a long vegetative strip (> 50 ft) within the side runway safety area prior to discharge into leaching catch basins. Proprietary treatment units are also available for use to remove 80% TSS. These types of devices are currently in use throughout the airport.

STANDARD 5 – Stormwater discharges from areas with higher potential pollutant loads require the use of specific stormwater management BMPs. The use of infiltration practices without pretreatment is prohibited.

As defined by the Handbook, LUHHPL’s include hangars, aprons or fueling facilities since they are subject to a NPDES Multisector General Permit (MSGP). As per the Handbook

(Vol.1, Ch. 1, p. 12), since runoff from the proposed Project area of runway and taxiway extension will not mix or comingle with runoff from the existing hanger, apron or fueling areas, the Project does not require structural BMPs suitable for LUHHPL areas.
For the two new general aviation hangars, the proposed new apron areas are considered LUHPPLs. Oil/water separators will be installed as necessary.
STANDARD 6 - Stormwater discharges to critical areas must utilize certain stormwater BMPs approved for critical areas. **Critical areas are Outstanding Resource Waters (ORWs), shellfish beds, swimming beaches, cold water fisheries, and recharge areas for public water supplies.**
These projects are not subject to Standard 6 as the project area does not discharge to a critical area

There is no work, no use, whether discretionary or necessary, that will not impact critical groundwater resources. The PCA provides drinking water to people, and flow to critical rivers that are essential to life in the Commonwealth as we know it.

The expansion of the airport is rationalized to be less harmful to the environment than trucking (relative to CO2 emissions)—we need to change everything we do that impacts the climate. Making assumptions that this use is less damaging is not a helpful approach to addressing the radical change that is upon us. Everyone and every business needs to do more.

Thank you for accepting and considering these quick comments.

Pine duBois, Exec. Dir. (she/her)
Jones River Watershed Association
Jones River Landing
55 Landing Rd.
Kingston, MA 02364
www.jonesriver.org
781-424-0353 (m)
781-585-2322 (0)

Save the River, Save the World!
pine@jonesriver.org

Comments for EEA #16692

hanlonmj@verizon.net <hanlonmj@verizon.net>
Mon 1/8/2024 7:35 PM
To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Hello Mr Moreno,

I am writing as a Plymouth MA resident and neighbor of Plymouth Municipal Airport. I am writing as my family and I have some concerns that we want addressed and some questions we would like answered.

Regarding the new expansion project. Neighbors were not notified properly of any public meetings for the expansion nor were we notified properly re the environmental public meetings. Facebook does not "count" in my opinion nor does an obsolete newspaper publication that residents need to purchase. Rarely do folks stop by the public library to find public notice. We all still have USPS. Approximately a year or so ago, I spent lunch of time trying to get on an airport notification email list. I went to meetings and put my address down. I contacted the manager and the town of Plymouth to request notification of meetings and agendas. After many months of trying, I finally began receiving agendas. Only to suddenly no longer receive those agendas when the first public meeting for the environmental impact of the project get on the calendar. Coincidence?

The new runway expansion is going to allow private jets (a particular type) carry more fuel and more passengers. This is will result in more air traffic to and from the airport. The goal being to focus on being attractive to more companies if they can carry more fuel and passengers and not have to stop elsewhere. This will result in an increase in air pollution, an increase in noise pollution and increase in polluting our grounds and our water.
Attached, you should find two examples of our frequent aircraft was over our home on two occasions. Just the other morning, we were shaken out of bed at 4:30 in the morning by a departure in our "community" airport. With an expansion of this runway, we expect these situations to only increase causing more disruption to sleep, increasing anxiety and blood pressure.
When was the last time our land has been tested for PFAs and or lead? When was the last time our water aquifer has been tested for PFAs and or lead? I attended the public meeting for the environmental impact and these questions were not answered clearly or with facts. We were told the air in our community was not even tested!

I have read what has happened at Hanscom and the surrounding community. I have read about communities around small airports in California. What about OUR community? Why is the business persons "bottom line" anymore important than taxpayers health and well being?

I am asking for our water supply to be tested for PFAs and lead. Recently. And accurately by a third party prior to the approval of this project.

I am asking for testing of OUR air, by a third party, DURING A BUSY TIME.

I am asking that the noise pollution be evaluated DURING A BUSY time, not when the weather is bad or the air space is closed or middle of winter when the skies are grey!

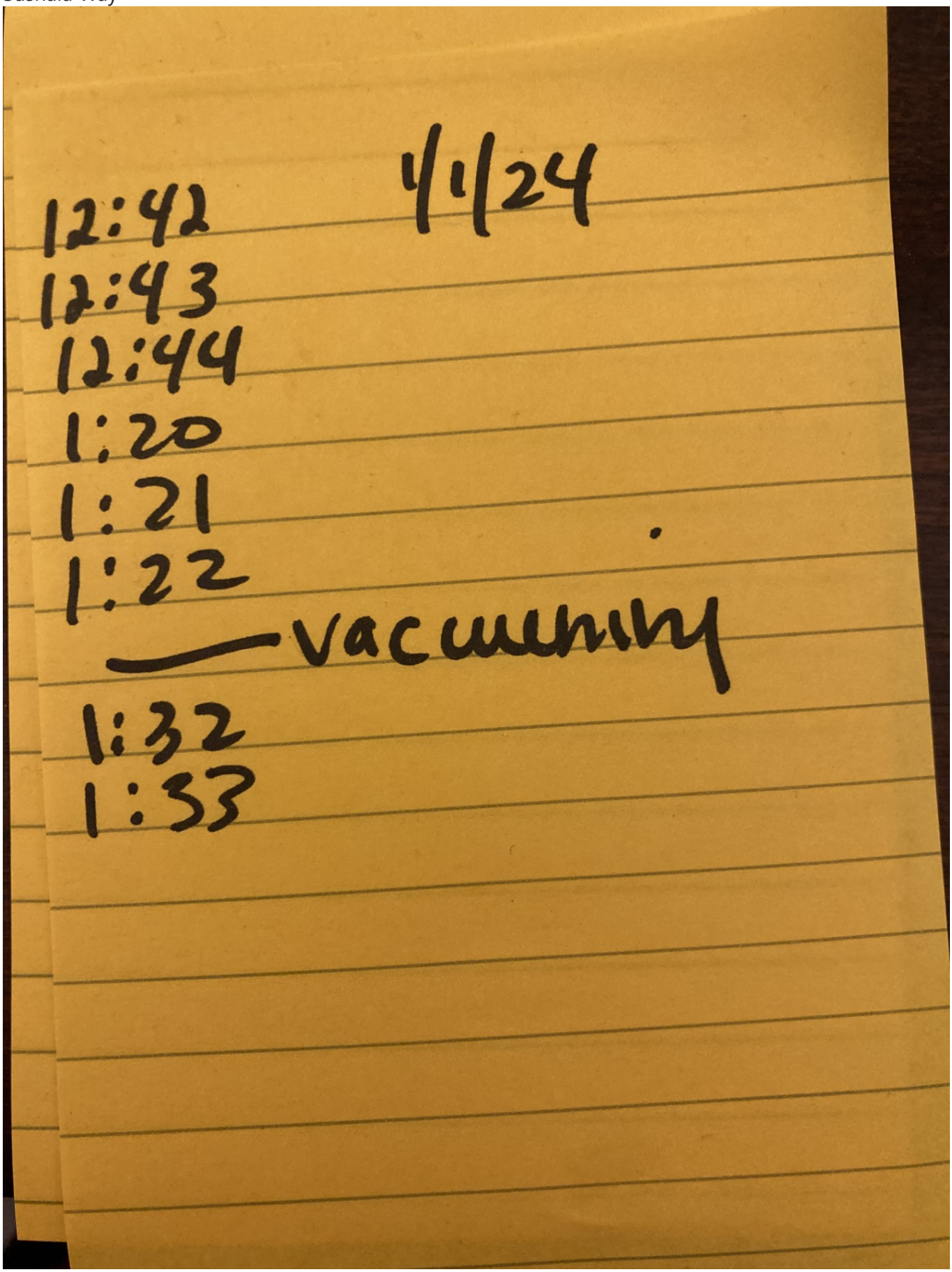
I am asking that the ground at West Recreation field and local daycares and schools be tested for lead and PFAs.

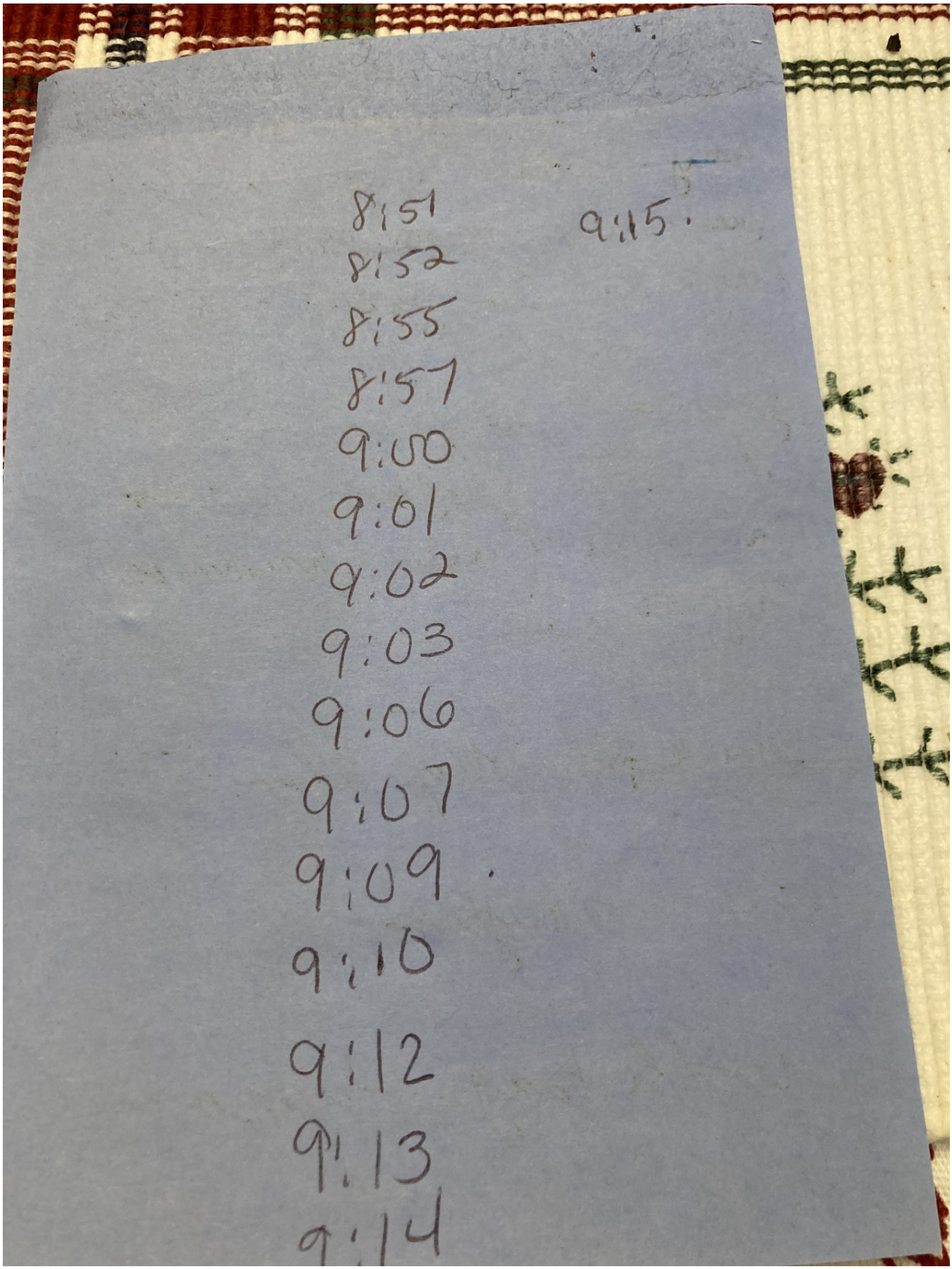
I am asking that the residents and taxpayers of West Plymouth and Carver be considered and appreciated. Please hold off with approval until our aquifer, ground and air can be adequately tested.

Thank you for your time.

Jennifer Hanlon

Sushala Way





Sent from the all new AOL app for iOS

Community Land & Water Coalition
P.O. Box 1699
Plymouth, MA 02362
www.communitylandandwater.org
774-260-7864

Carver Concerned Citizens
carverconcernedcitizens@gmail.com
Carver, MA

Save Massachusetts Forests
www.savemassforests.org
savemassforests@gmail.com

RESTORE: The North Woods
P.O. Box 1099
Concord, MA 01742
www.restore.org
restore@restore.org

January 8, 2024

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street
Boston MA 02108

% Nicholas Morena
MEPA Analyst
nicholas.moreno@mass.gov

Re: Plymouth: Comments on MEPA EEA # 16692, Draft NEPA Environmental Assessment and MEPA Draft Environmental Impact Report

Dear Secretary Tepper and Regional Administrator Cash:

Thank you for the opportunity to comment on the October 31, 2023 Draft NEPA EA and MEPA EIR and the supplemental package of December 13, 2023 for the Plymouth Airport Runway 6 extension and other capital improvements (the Project).

These comments are submitted by Community Land & Water Coalition (a project of Save the Pine Barrens, Inc.), Carver Concerned Citizens of Carver, Massachusetts, Save Massachusetts Forests (Save Mass Forests) and RESTORE: The North Woods (RESTORE).

Community Land and Water Coalition (CLWC) is a non-profit community group with members that live, work and/or recreate in the Plymouth area and who are impacted by the Project. The missions of Carver Concerned Citizens, Save Mass Forests and RESTORE include protecting and preserving Massachusetts forests and ecosystems including the public forests in Myles Standish State Forest abutting the Project site.

CLCW's mission includes the protection and stewardship of lands and waters and community members in the Plymouth area. This includes protecting the drinking water in the Sole Source Aquifer. *55 Federal Register 32137. See, Safe Drinking Water Act, 42 USC section 300h-3(e).* The Aquifer covers 199 square miles and is the sole drinking water source for about 200,000 people. The Aquifer is designated under the Safe Drinking Water Act, a federal law, due to its sandy soils, high transmissivity, and its vulnerability to contamination. The Project is in the federally protected Aquifer. The Aquifer is shallow and intercepted by wetlands, streams and ponds that also may be impacted.

The DEIR does not comply with the Scope set forth in the Secretary's May 26, 2023 Certificate on the Environmental Notification Form (Certificate) and is defective in material respects.

We urge the Secretary to find that the DEIR and EA do not adequately and properly comply with MEPA and 301 CMR 11.00 and request that you require the Proponent to file a supplemental draft EIR in accordance with 301 CMR 11.07.

I. Cumulative impacts of land use changes, including unregulated sand and gravel mining surrounding the Site not addressed

This is the second large capital project CLWC and its allies have commented on to MEPA in the last six weeks. On December 1, 2023 our coalition submitted comments on MEPA EEA #16758 for the expansion of the Plymouth Wastewater Treatment Facility (WWTF) located in Camelot Park. The Town seeks to divert the 90% of the wastewater currently discharged to Plymouth Harbor to discharge into the Plymouth Carver Sole Source Aquifer by increasing the volume at the WWTF Site to a total of 3 million gallons per day and diverting the discharge to the Eel River watershed.

In addition to these projects under environmental review, there are innumerable unregulated and uncontrolled industrial scale sand and gravel mining operations stripping forests, vegetation and topsoil from thousands of acres in Plymouth County, including adjacent to the Airport site. All of these projects overlay the Sole Source Aquifer. As set forth below in these comments, the Draft

EIR and EA fail to adequately address impacts to the Aquifer. Not one of these sand and gravel mining operations has undergone environmental review under MEPA. Numerous groups and individuals have brought this failure of the MEPA regulatory process to the attention of you as Secretary and your predecessor Secretary Theohardies as well as to Governor Healy and Climate Chief Hoffer. To date, the Governor and EEA have refused to require these projects to be reviewed by MEPA, citing legal loopholes and technicalities that make a mockery of MEPA.

The scope and scale of the unregulated sand and gravel mining operations causing a silent environmental crisis in our 85-page report, ***Sand Wars Southeastern Massachusetts: the money, politics and corruption behind sand and gravel mining in Southeastern Massachusetts.*** It can be found on our interactive website, www.sandwarssoutheasternma.org. A documentary film explains the disaster underway and is found on YouTube. These projects include illegal dredging for sand and gravel in the Aquifer in violation of the Clean Water Act. The projects are permanently removing the natural filtration for the Aquifer, exposing it to increased contamination including pollution from nitrates and nitrogen. Immediately adjacent to the Airport are several unregulated sites where the environmental impacts have never been addressed.

Sand and gravel mining, in combination with the Airport expansion and the Plymouth WWTF requires your urgent attention. We request that you take leadership and order a comprehensive, cumulative evaluation and environmental study for every environmental aspect of these projects as a whole, cumulatively. Not once, to our knowledge, has EEA brought to the attention of the EPA, or even acknowledged itself, the mandates of the Safe Drinking Water Act with regard to the Sole Source Aquifer. The 1990 designation, 55 Federal Register 32137 requires "Project Review" by federal agencies with the state and project developer, for any project with federal financial assistance for projects that requires special review….to determine whether they may contaminate aquifer, and if so identify the "ground water protection measures" that will be implemented. Has that review ever been done? It should be done for the Airport expansion at a minimum.

II. The DEIR/EA use inconsistent and conflicting descriptions of the "Study Area" and "Project Site"

The DEIR and EA define the "Study Area" and "Project Site" differently for different purposes. See Section 4.1. When it talks about impacts, it's a small area; when it wants to use the area outside that for mitigation, it uses the larger 748 acre site. Which is it? The failure to use a consistent description for the Study Area and Project Site makes it impossible to compare alternatives, evaluate impacts, and assess the effectiveness of mitigation. There should be one uniform description for the Study Area and Project Site.

The use of these conflicting descriptions seems to contradict the MEPA Certificate that says:

> "As discussed above, the ENF was filed as to the Runway 6 project only, even though it is part of a larger master plan (TMPU) that governs work at the Airport over a common time frame. Consistent with prior reviews of other airport master plans (EEA #15964, 16128, 16640), the DEIR should reframe the project under review as the TMPU (the

> "project" will be re-named in the DEIR), and provide a description of all projects proposed under the TMPU. All impacts calculations should be updated to reflect the full master plan. To the extent full details are not known of future projects, the DEIR should provide a conceptual description sufficient to estimate cumulative impacts associated with all projects. The DEIR should also describe a mechanism for conducting more detailed reviews of future projects through the filing of NPCs," (page 10).

The DEIR and EA fail to follow this directive from the Secretary in the MEPA Certificate, and this failure, when combined with conflicting descriptions of the area under review, renders the DEIR and EA wholly inadequate.

The DEIR and EA do not provide an adequate "overview of the Airport's functions and activities related to general aviation and commercial services, with a focus on the role each of the project components plays in the operation of the Airport." Certificate, p. 10. They do not provide an adequate description of the current air traffic, types of planes, types of fuels used and purpose of the flights.

According to the FAA, lead is still used in some aviation fuels. https://www.faa.gov/about/initiatives/avgas#:~:text=Aviation%20gasoline%20(avgas)%20is%20the,can%20operate%20on%20leaded%20avgas.

Are these lead-containing fuels used at the Airport?

What are the potential routes of exposure of the public and the drinking water to lead contamination?

III. Inadequate description of the "Affected Environment"

This section has numerous egregious defects, gaps and inaccuracies. A few of these are addressed below.

Section 4: Affected Environment, 4.2, "Resources Not Affected."

This section concludes water resources are not affected and do not require study. This is unsupported by the facts and is unacceptable for many reasons, most notably the project overlays a federally designated Sole Source Aquifer, where many public water supplies are already contaminated and being treated for various chemicals, including manganese. The region has some of the highest manganese contamination levels in all public water supplies in the region. A new study addressed this in other parts of the state. https://www.bu.edu/sph/news/articles/2023/mass-drinking-water-may-contain-unsafe-levels-of-manganese/

All water resources should be studied, most importantly the Sole Source Aquifer.

4.2.7 Water Resources: Floodplains and Floodways. These should be studied, not ignored.

4.2.8. Water Resources: Groundwater. Section 4.2 of the study says drinking water wells are "not affected." The study does not give enough information about this conclusion.

As a whole, this section is totally inadequate. See for example, page 32 of the DEIR. It ignores private and public water supply wells and the new Weathervane development directly across the street. This was the site of a massive sand and gravel mining operation in the last few years. What is the impact of this on water flow below and above the ground? Has it changed the groundwater flow direction around the Airport or caused groundwater mounding and increases in baseflows of the surrounding rivers that impacts the wetlands on the Airport site, contributing to potential flooding?

The DEIR states, "Hydrologic studies indicate that groundwater in the PCA generally moves in a north to south direction from Middleborough toward Wareham, and in an east to west direction, toward Plymouth Harbor." What is the year of this study and who was it done by? Does it take into account the massive changes in topography in the Aquifer area over the last 2, 5, 10, 20 years, caused by unregulated sand and gravel mining that has leveled hills and stripped off the vegetation, and sand and gravel mining that impacts groundwater flow direction and infiltration? Have changes in evapotranspiration been taken into account?

The DEIR states, "As shown on **Figure 4-11**, there are no Interim Wellhead Protection Areas nor Zone II Protection areas as mapped by MassDEP on Airport property." This does not account for the private drinking water wells in the area. How many are there? How many people rely on private wells? Is the new development using private wells? Our maps of wells show additional wells not documented in the DEIR.

"Data from December 2014 through August 2023 indicate that the water levels are fairly consistent with monthly and seasonal fluctuations that show similar trends (**Figure 4-12**)." This conclusion is inaccurate. First, it is too short of a period to give any indication of the levels over time and impact of climate change and land alterations including topography. Second, the Figure 4-12 actually shows **an upward trend of higher groundwater elevations, not "water levels [that are] fairly consistent."** The conclusions in this section about water resources do not pass scientific muster.

What are the impacts of surrounding land use changes on the monthly and seasonal fluctuations? What are future trends based on the dramatic land use alterations occurring? Does this raise more concerns about flooding?

The Town of Plymouth 2019 draft water plan states:

> The Airport "is located adjacent to the Zone II area [protection area] for the **Federal Furnace Well and could be a potential source for per and polyfluoroalkyl substances (PFAS).**"
>
> Considering how susceptible the [Town's] sources are to contamination; it is recommended that a more stringent groundwater protection district be developed.

The Town of Plymouth has taken no steps whatsoever to implement a "more stringent groundwater protection district" around the Federal Furnace Well to protect it from contamination by PFAS and other chemicals used at the Airport. The DEIR must:

- Provide and document all groundwater quality testing results for the Federal Furnace Well and the West Plymouth Zone for the last 20 years and report on all contamination results, trends and mitigation measures.
- Identify the "more stringent groundwater protection district" measures that the Town of Plymouth plans to undertake to protect the Federal Furnace Well.

The Airport Expansion project **should not move ahead without the potential impact on the Federal Furnace Well being fully addressed. This includes a complete update study of contaminants, plumes, and an updated hydrological study.** To ignore this drinking water well and potential impacts from the Airport threatens the public safety by potentially exposing residents of Plymouth to more PFAS contamination and recklessly exposing the public (and private) drinking water wells to risk of contamination.

The MEPA Certificate states:

> "Any project impacts that could materially exacerbate such conditions should be analyzed. To the extent any required Permits for the project contain performance standards intended to protect public health, the DEIR should contain specific discussion of such standards and how the project intends to meet or exceed them. The DEIR should discuss whether Per- and Polyfluorinated Substances (PFAS) remediation will be included as part of any projects proposed under the TMPU, and describe any ongoing efforts to address PFAS releases that may have been identified during Airport operations."

> "The DEIR should identify all measures that will be employed to protect the water quality of the SSA, provide a description of the proposed stormwater management system for each project/phase and identify BMPs that will be incorporated into its design," (Page 13).

The impacts to drinking water wells and the Aquifer are required to be addressed by the Certificate but the DEIR just completely ignores them.

IV. Stormwater Pollution Prevention.

Where is the Stormwater Pollution Prevention Plan (SWPPP)? It should be included and made part of the data base for the Project. The DEIR states it was updated, but where is it? Where are the mandatory quarterly inspections done? Where is the documentation of proper record keeping for inspections and operation and maintenance as required by MassDEP's stormwater regulations and policies?

There should be more water quality data to get a baseline before the Airport can discharge more contamination to the Aquifer.

V. Inadequate Study of Impact, Mitigation and Alternative Regarding Priority Habitat/MESA/ESA Species

In general, the DEIR and EA are completely incomprehensible on this issue. They fail to provide an adequate description of the impacts to ESA-NHESP interests and fail to provide, in **Plain English for the public and EJ communities to understand**, what the impacts are. Instead, they rely on NHESP techo-jargon, such as referring to a number of Conservation Management Permits, without providing an adequate description of what these are, their purpose, or the status of compliance, etc.

The Airport contains about 352 acres of mapped Estimated Habitat of Rare Wildlife and/or Habitat of Rare Species. Of this 60 are "managed pursuant to a NHESP-approved Grassland Management Plan for grassland bird species," May 26, 2023 ENF Certificate, page 4.

Appendix P states,

The Airport's Grassland Habitat Management Plan (GHMP), updated September, 2018, and associated Conservation Management Permit (CMP) provides a rare species management strategy that sets forth how the Airport will manage future impacts and provide mitigation within the scope of the Massachusetts Endangered Species Act (MESA) and its implementing regulations. The Airport will continue to coordinate with NHESP to provide an amendment to the GHMP demonstrating a net-benefit to listed grassland bird species and identify mitigation areas (including the use of "banked" surplus areas) for the following habitat alterations:

- Temporary Impact (Grading): 4.18 acres total
- Permanent Impact (Pavement): 2.49 acres total
- Change from Infrequently to Frequently Mown of 3.06 acres
- To minimize impacts, the temporarily impacted areas will be restored to existing conditions and seeded with an airport-approved grass seed mix.

What does this actually mean?

The DEIR-EA do not provide the CMPs or a clear identification of where the properties are. They contain various references to "MESA CMP # 005-049.DFW, # 014-240.DFW, and # 018-329". Where are these permits? What do they do? Who is enforcing them? How is the public informed? Where are the parcels located that they pertain to? Where are all their appendices? Is the Airport in compliance? What was the public input on allowing the Airport to get these permits in the first place?

- Where is the current scientific data to show that the "Grassland Management Plan" is actually preserving the habitat for the species? Where is the baseline/before information, current information, and future information that the state's plan for mowing, burning, and logging to provide habitat for these species is actually resulting in their "recovery?"

- What are the GHMP and the associated CMP and are they anywhere in the documents?
- What is the efficacy of either plan in terms of documentation of species identified as indicators of the GH?
- What species were there before the Plan was implemented?
- What are the studies done to document species populations over time?
- Which species are susceptible to increased fragmentation of the area?
- How is the protected grasslands and species affected by the ongoing increased noise from the airports increased air traffic?
- What state listed species are documented in MSSF, and how are they affected by increased local traffic and land disturbance?
- What are "banked surplus areas?"
- What are proposed locations?
- What are the goals for these areas?
- What is their scientifically proven efficacy to achieve those goals?
- If there is a need for more banked surplus areas, what would be the area in acres of what would produce a factually documented mitigation.
- Should there be a mitigation plan for MSSF?
- As Motzkin and Foster (2002) note (excerpt below), "the pre- and early-historical distribution and abundance of uncommon plant and animal species that are characteristic of open habitats today are almost completely unknown." What is the documentation used to determine which species are targeted for management and whether this is appropriate habitat for these species?
- What scientific analysis has the Airport done which shows that the habitat it is "restoring" will be equivalent to the habitat that will be paved over and/or "temporarily impacted"?
- This plan apparently includes "frequently" mowing 3.6 acres, on an indefinite basis. What is the Airport's plan for monitoring and assessing the ecological status of the habitat? How will the Airport ensure that the resources will be available to monitor, assess, and maintain this habitat now and in the foreseeable future?

- What species of grass will be included in the "airport-approved grass seed mix," where will the seed be obtained, and how does the Airport know which species are appropriate for this habitat?

- How will the Airport prevent the spread of invasive plant and animal species on disturbed lands and "restored" habitats?

- What are the expected impacts of grading and pavement on the species now living in these "impacted areas," including plants, animals, insects, microorganisms, fungi, and other non-target species?

Reference:

Motzkin, G., and Foster, D. R. 2002. Grasslands, heathlands and shrublands in coastal New England: historical interpretations and approaches to conservation. Journal of Biogeography, 29(10-11), 1569–1590. doi:10.1046/j.1365-2699.2002.00769.x

Federally protected species: ESA

Two of these state-protected species are also protected under the federal Endangered Species Act, the Northern Long Eared Bat and the Plymouth Redbelly Turtle. Section 5.5.2. The Report concludes, with no credible scientific data, that the Project "will not negatively affect these federally-listed species."

CLWC on behalf of the public demands complete and open public participation in the NHESP "coordination" of the impacts. See, 4.3.2.2. It is not acceptable for project proponents, especially a public body using public funds, to negotiate behind closed doors with NHESP to discuss the destruction of MESA listed species. We demand: 60 day notice of all meetings between the project proponent and NHESP-MassWildlife agencies, written notice of all draft decisions and proposed changes to existing CMPs and the chance to comment on new CMPs. The current manner in which NHESP handles CMPs and public notice is contrary to the state's Environmental Justice policy and MEPA. It is exclusionary, biased and allows NHESP to operate behind a veil of secrecy and with no accountability and transparency. In this situation, given the public funds involved, this is unacceptable. Further, the Project abuts Myles Standish State Forest which is ignored throughout the DEIR. The wildlife habitat corridors at the Airport are interconnected with MSSF and cannot be ignored.

VI. Air Quality

4.3.1 Air Quality.

The DEIR - EA used an air station in Boston to conclude that air pollution is not a problem. That is unacceptable. Local residents who live, work and recreate near the Airport have reported directly to Airport staff that the levels of fumes and air pollution on the ground around the Airport are overwhelming and make it difficult to breathe. The Airport must conduct a thorough air pollution study to obtain baseline, current air pollution levels and future impacts, including

wind rose modeling and setting up air monitoring stations. The Airport must provide reliable, science based evidence documenting local conditions and provide evidence that the fumes from the Airport are not harming people now or in the future.

VII. Recreational Resources

The Site abuts Myles Standish State Forest and flight paths go over the forest. Yet, the DEIR and EA just treat MSSF as a blank spot on the map without identifying any potentially impacted resources at all. MSSF is the state's largest state forest. Potential impacts include air, noise, light pollution and aesthetic impacts to the tens of thousands of visitors to the Forest annually and potential impacts to wildlife. Page 3 states, "The approach to Runway 33 contains open space, Myles Standish State Park, and Southers Marsh Golf Club, which are considered to be compatible with the Airport development and operations….These open spaces are considered to be compatible land uses with the Airport development and operations."

Using a public forest for a runway approach is not a compatible use, but substantially interferes with the ability of the visitors to the Forest to enjoy nature's quiet, peace and tranquility and to be free from noise, light pollution and low flying aircraft. This is a fundamentally flawed premise in the DEIR and EA and completely undermines the credibility and conclusions of these studies.

How is the large state designated reserve that is Myles Standish State Forest affected by aircraft noise, light pollution and air pollution?

In conclusion, the DEIR and EA do not adequately and properly comply with MEPA and 301 CMR 11.00 and should require the Proponent to file a supplemental draft EIR in accordance with 301 CMR 11.07.

Please feel free to contact the undersigned if you have any questions.

Very truly yours,

Margaret E. Sheehan, Esq.

For:
Community Land & Water Coalition
Carver Concerned Citizens, Mary Dormer Co-Chair
Save Massachusetts Forests, Janet Sinclair
RESTORE: The North Woods, Micheal Kellett

cc:
Southeastern Massachusetts Pine Barrens Alliance
Friends of Myles Standish State Forest

Exhibit 1: Map of wells not shown in the DEIR-EA.

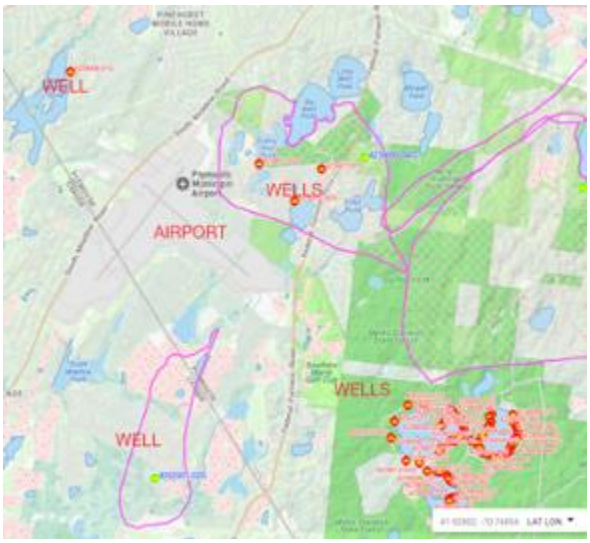


Exhibit 2: Examples of land use change around/on the Airport 2015 to 2023

Before:

After: 2023

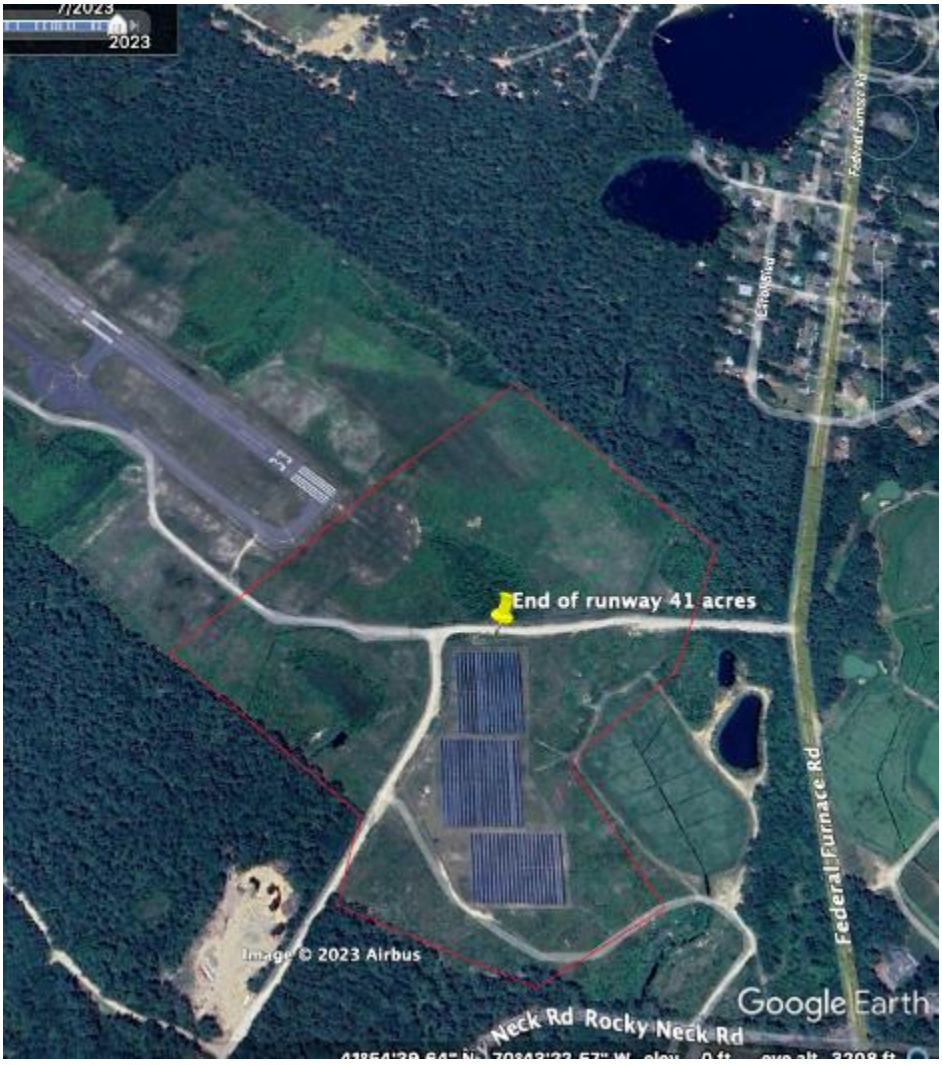
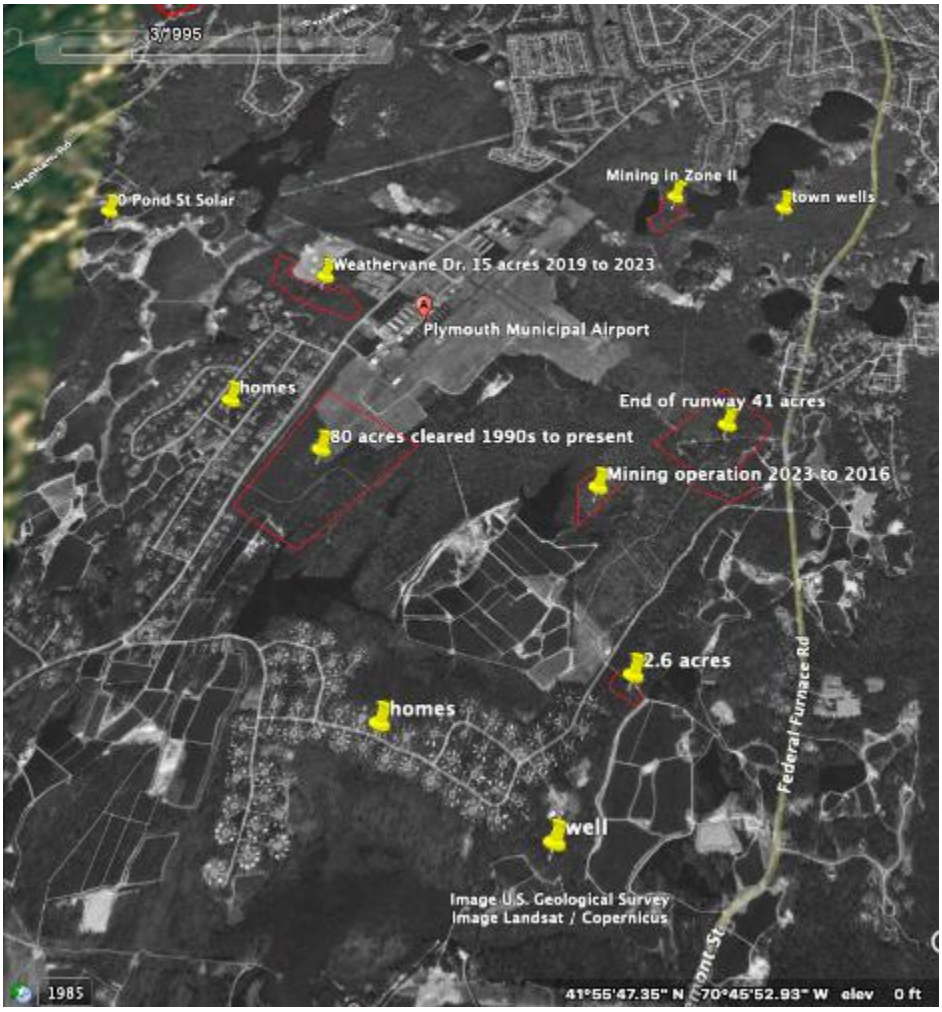

2023
End of runway 41 acres
Federal Furnace Rd
Image © 2023 Airbus
Google Earth
Neck Rd
Rocky Neck Rd

Exhibit 3: Some sand and gravel mines around the Airport, 1995 to 2023
Before: 1995



After: 2023:

Directly across the road: Weathervane Dr. 15 acres stripped 2019 to 2023


7/2023
1985
2023
0 Pond St Solar
Mining in Zone II
town wells
Weathervane Dr. 15 acres 2019 to 2023
Plymouth Municipal Airport
homes
End of runway 41 acres
80 acres cleared 1990s to present
Mining operation 2023 to 2016
2.6 acres
homes
Federal Furnace Rd
well
Image © 2023 Airbus
1985
41°55'43.20" N 70°45'48.40" W elev 0 ft

REGION 1
BOSTON, MA 02109

January 8, 2024

Cheryl Quaine
Federal Aviation Administration
New England Division
12 New England Executive Park
Burlington, MA 01803

Rebecca L. Tepper, Secretary
Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: EPA comments on the Draft Environmental Assessment and Draft Environmental Impact Report (EEA File Number: 16692) for the Plymouth Municipal Airport Extensions to Runway 6-24, Taxiway A, Taxiway E and 5-year Capital Improvement Plan, Plymouth, Massachusetts

Dear Secretary Tepper and Ms. Quaine:

We are writing in response to the Draft Environmental Assessment (EA) and Draft Environmental Impact Report (DEIR) for the Plymouth Municipal Airport project located in the Town of Plymouth, Massachusetts. We submit the following comments on the EA/DEIR in accordance with our responsibilities under the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Safe Drinking Water Act. The EA/DEIR describes several capital improvement projects at the Plymouth Municipal Airport including the Runway 6-24 extension, extensions to taxiways A and E; relocation of runway lighting; development of two (2) new hangars; and other possible on-and-off airport property construction. As outlined in the 2022 Technical Master Plan Update (TMPU), the 5-year improvement plan also describes water/sewer main upgrades, reconstruction of Runway 6-24 and Gate 3 taxilane, and emergency generator airside infrastructure. According to the EA/DEIR the purpose of the proposed airport work is to bring the airport in compliance with Federal Aviation Administration (FAA) safety standards. The safety improvements are focused on runway and taxiway lengths and other upgrades to address operations during airport peak hours. Other proposed work is focused on enhanced climate resilience and economic objectives for the airport.

EPA reviewed the EA/DEIR and offers the following comments and recommendations related to the analysis of groundwater/aquifer protection, public and private drinking water, chemical storage and use, spill prevention control, and stormwater management. We request that these issues be more fully addressed in the final EA/EIR for the project.

Plymouth/Carver Sole Source Aquifer

The Plymouth Municipal Airport project is located over the Plymouth/Carver Sole Source Aquifer. EPA's review of the EA/DEIR focused primarily on the project's potential to impact the underlying aquifer pursuant to our responsibilities under Section 1424 (e) of The Safe Drinking Water Act (SDWA). The SDWA provides EPA discretionary authority to review federally funded projects within Sole Source Aquifers. In this case, a portion of the funding for the project is being supplied by the Federal Aviation Administration. The Plymouth/Carver Sole Source Aquifer was designated on August 7, 1990. (Federal Register Notice Vol. 55, No.152).[1]

Based on our review we found that the EA/DEIR does not provide sufficient information to assess the potential for groundwater impacts associated with the project. For example, Section 4.2.8 Water Resources – Groundwater (EA page 32) does not provide any descriptive information about the locations of public or private water supply wells or other drinking water sources (relative to potential groundwater impact areas), depth to groundwater, or groundwater flow directions. Based on the lack of information, we do not agree with the preliminary conclusion in the EA that groundwater "…is considered a resource not affected and is dismissed from further consideration."

The comments and recommendations in the balance of this letter are framed to help the FAA provide information to support the conclusions regarding potential impacts to groundwater as part of the joint NEPA and MEPA process. EPA will review the responses to our comments provided in the final EA/EIR to determine if additional information is required to understand potential impacts to groundwater or if any follow-up groundwater assessment is warranted. We encourage the FAA to coordinate with us directly during the preparation of the final EA for any necessary clarification regarding our recommendations.

Aquifer Protection

We recommend that the EA/DEIR be expanded to fully support any conclusions reached regarding direct or cumulative groundwater impacts to include the following:

- A map showing groundwater depth, contours, and flow directions to better describe the context, existing location and subsurface environment for areas potentially affected by the proposed project. Please show the location of existing and proposed monitoring wells and include a narrative to explain how groundwater contours were developed. We recommend that the locations of public and private water supply wells and surface water supply sources within 5 miles of the proposed project be included in the maps.

- A list describing the expected annual loading of potential contaminants of groundwater (as compared to baseline conditions at the airport—see below) from construction and project-related operations including information on fuel-related contaminants and loadings such as volatile organic compounds, metals, and polyaromatic hydrocarbons.

- A description of any past contamination events at the airport along with baseline groundwater contaminant conditions.

[1] EPA's review and comments on the EA/DEIR does not constitute a Sole Source Aquifer project review. Should EPA choose to exercise its authority and discretion under the SDWA the scope of the analysis for any future review will be determined at that time.

- An expanded description of measures and best management practices to reduce the release of contaminants and provide aquifer protection during construction and airport operations. We specifically recommend additional detail regarding how the airport will protect groundwater from contaminated runoff, spills, or accidents at the airport.

Chemical Storage and Use

We recommend that the final EA/EIR provide a list of chemicals and de-icing products used at the airport, and a description of where and how they will be stored and managed on airport property. A full discussion of aircraft or vehicle maintenance practices/activities that can pollute runoff along with measures that will be implemented to reduce and control pollutants is recommended. We also recommend that the final EA/EIR include a list of past and current firefighting foam products (which might contain per- and polyfluoroalkyl substances PFAS/PFOA/PFOS) which will be used in association with the proposed project.

Monitoring Plan

We recommend that the final EA/EIR consider the development of multi-media monitoring as a means of determining the effectiveness of pollution prevention measures aimed at preventing or minimizing the potential for the proposed project to contaminate the aquifer. We request that the final EA/EIR include a monitoring plan that describes how and when soil and groundwater will be monitored for potential contaminants of concern and how baseline soil and groundwater contaminant conditions will be established. We recommend that the monitoring plan detail the frequency of sampling and how the sampling results, along with needed and executed response actions, will be shared with appropriate water department officials in the project area. We recommend annual reporting.

Public and Private Drinking Water Sources and Coordination with Water Systems

The EA/DEIR states that "…there are no Interim Wellhead Protection Areas nor Zone II Protection Areas as mapped by MADEP on Airport property." (EA Page 32). Figure 4-11 provides the related map. We recommend that the final EA/EIR provide additional hydrogeologic information as it relates to the flow of potential contaminants from the proposed project, including construction, and the potential impact, including groundwater flow continuing off-site, to existing or proposed public or private water supplies. We recommend that distances and time of travel (if times are readily available) to nearest water supplies be provided. We also recommend that the EA describe past and proposed future coordination with public water supply systems regarding drinking water resources.

Spill Prevention Control and Countermeasure Plan

Given the location of the proposed project above a Sole Source Aquifer EPA recommends that the airport's Spill Prevention, Control and Countermeasure (SPCC) Plan be updated prior to construction to account for all aspects of the proposed project's construction and operations. For more specific information about requirements with the SPCC rule, refer to *www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spill-prevention-control-and-countermeasure-19.* Please direct questions regarding the SPCC rule to EPA's Joe Canzano at canzano.joseph@epa.gov or 617-918-1763.

Stormwater Management

Given the location of the proposed project above a Sole Source Aquifer, EPA recommends that the airport's erosion and sediment control plan, and associated stormwater runoff controls and Best Management Practices (BMPs), consider ground water resources at the site. We encourage the use of monitoring wells and advanced stormwater BMPs (including pretreatment capabilities as required by Massachusetts stormwater requirements).

Underground Injection Control

EPA's Underground Injection Control (UIC) program is administered by MassDEP and, as such, UIC systems are regulated by MassDEP. Infiltration best management practices used to drain stormwater runoff or other wastewater are regulated as "Class V" underground injection wells under Massachusetts UIC regulations (310 CMR 27.02) if they include any of the following:

- a bored, drilled, or driven shaft, a dug hole, or seepage pit whose depth is greater than its largest surface dimension; or,
- an improved sinkhole; or,
- any subsurface structure that has a soil absorption system (SAS) with a subsurface fluid distribution line and aggregate. Note: This refers to subsurface infiltration enhancement systems but does not include underdrains designed to collect and convey stormwater to a surface outfall or a storm drain network.

If any of these are proposed as part of the project we recommend that the final EA/EIR describe how they are designed to meet appropriate standards. Please direct questions about UIC regulations to Joe Cerutti, the MassDEP UIC Program Coordinator, at joseph.cerutti@state.ma.us or 617-292-5859.

Please feel free to contact us during the development of the final EA/EIR for clarification of any of the comments and recommendations provided above. EPA requests the opportunity to be kept informed about any activities that might affect the Sole Source Aquifer during project design, construction, or operation. Please communicate directly with the EPA Region 1 Sole Source Aquifer Coordinator, Kira Jacobs. She can be reached at jacobs.kira@epa.gov or 617-918-1817.

Sincerely,

Timothy Timmermann, Director
Office of Environmental Review

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

January 8, 2024

Rebecca L. Tepper,
Secretary of Energy and Environment
Executive Office of Energy &
Environmental Affairs
ATTN: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: DEIR Review EOEEA #16692
PLYMOUTH. Plymouth Municipal Airport
Runway 6 Extension Improvement Plan
at 71 Airport Road

Dear Secretary Tepper,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Draft Environmental Impact Report (DEIR) for the Plymouth Municipal Airport Runway 6 Extension and Technical Master Plan Update, LLC at South Meadow Road, Plymouth and Carver, Massachusetts ((EOEEA #16692). The Project Proponent provides the following information for the Project:

This FEIR Supplement has been prepared to address the Secretary's directive to SouthCoast Wind to provide additional information on wetlands, water quality, air emissions, ocean/ benthic impacts, marine and rare species, and environmental justice. SouthCoast Wind was also directed to provide more definitive mitigation measures and commitments for the Project. SouthCoast Wind has developed comprehensive responses to the comment letters received on the FEIR. We have addressed the items outlined in the Scope of the FEIR Certificate, including updated reports such as an updated Fisheries Monitoring Plan, which has been revised to reflect recent consultations with the Massachusetts Division of Marine Fisheries (DMF). As requested in the Secretary's Scope, SouthCoast Wind has consulted with the Massachusetts Coastal Zone Management (CZM) Office, Massachusetts Department of Environmental Protection Southeast Regional Office (MassDEP), Massachusetts Natural Heritage and Endangered Species Program (NHESP), and MA DMF to review SouthCoast Wind's analysis and response to agency comments. In addition, SouthCoast Wind is actively working with the Town of Somerset to develop a host community agreement designed, in part, to address coordination with the Town on construction of the Project.

Bureau of Water Resources (BWR) Comments

Wetlands. The Project as proposed will not alter any wetlands resource areas. However, according to the DEIR, some of the work may fall within the buffer zone to bordering vegetated wetlands

(310 CMR 10.55) and would require a final Order of Conditions prior to commencement. It should also be noted that there is an open wetlands variance for work at the project site and this proposal must not conflict with conditions of the variance.

Underground Injection Control. The Project Proponent reports its proposed use of its infiltration systems requiring registration under the MassDEP Underground Injection Control (UIC program. These structures must be registered with MassDEP UIC program through the submittal of a BRP WS-06 UIC Registration application through MassDEP's electronic filing system, eDEP. All information regarding on-line (eDEP) UIC registration applications may be obtained at the following web page: https://www.mass.gov/info-details/underground-injection-control-uic-application-forms. The statewide UIC program contact is Joe Cerutti who can be contacted at joseph.cerutti@mass.gov.

Bureau of Waste Site Cleanup (BWSC) Comments

BWSC finds the project proponent's responses to BWSC's comments accurate and acceptable. BWSC has no further comments or questions.

Bureau of Air and Waste (BAW) Comments

Air Quality. Construction and operation activities shall not cause or contribute to a condition of air pollution due to dust, odor or noise. To determine the appropriate requirements please refer to:

- 310 CMR 7.09 Dust, Odor, Construction, and Demolition
- 310 CMR 7.10 Noise

The Proponent is advised that the Department's Air Quality regulations (310 CMR 7.11(3) Aircraft) specifies that "No person owning or operating an airport shall cause, suffer, allow, or permit routine warmups, testing, or other operation of aircraft while on the ground, in such a manner as to cause or contribute to a condition of air pollution, outside of the property lines of the airport, that in the opinion of the Department are unreasonable and feasibly preventable." To further clarify, this means that all aircraft, once on the ground, should cease to operate its engines until such time when departure is warranted. Alternatively, to running these engines on idle, when warranted to maintain comfort within these aircraft during the warm summer months, plug in stations should be provided by the airport as an alternative to the greenhouse gas emissions, air pollutant emissions and noise that are emitted while these engines continue to operate while on the ground to keep onboard systems (refrigeration, air conditioning, etc.) running.

In fulfillment of the requirements of 301 CMR 11.07(6) and the Greenhouse Gas (GHG) Emissions Policy and Protocols (https://www.mass.gov/doc/greehouse-gas-emissions-policy-and-protocol/download), the Proponent is required to provide the Department with an analysis of alternatives to idling (plug in stations) to address GHG, air quality in general and noise, and the proposed mitigation measures to reduce those emissions.

Solid Waste Management. The Proponent's DEIR has addressed the Solid Waste Management program's comments.

Industrial Wastewater. Plymouth Municipal Airport is required to demonstrate the ability to apply extinguishing agent as part of its FAA Part 139 safety certification. The capital improvements to the airport should include provisions to collect the wastewater containing the extinguishing agents generated during these demonstrations and/or training events so that proper storage, treatment and/or disposal can occur in conformance with Massachusetts requirements.

Other Comments/Guidance

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this ENF. If you have any questions regarding these comments, please contact George Zoto at George.Zoto@mass.gov or Jonathan Hobill at Jonathan.Hobill@mass.gov.

Very truly yours,

Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
Gerard Martin, Deputy Regional Director, BWR
John Handrahan, Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, ADMIN
Maissoun Reda, Chief, Wetlands and Waterways, BWR
Brendan Mullaney, Waterways, BWR
Mark Dakers, Chief, Solid Waste, BAW
Jennifer Wharff, Solid Waste, BAW
Jeffrey Hunter, Solid Waste, BAWS
Angela Gallagher, Chief, Site Management, BWSC
Amanda Cantara, Site Management, BWSC

The DEIR and EA for the Plymouth Airport Expansion Are Inadequate

Ellen Sturtevant <noreply@adv.actionnetwork.org>

Tue 1/9/2024 7:55 AM

To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

Dear state and federal officials:

I recently sold my condo in Florida which was near a small airport which handled private small jets and plane. The noise of jets and planes taking off and landing could be particularly bothersome. In addition, residue from the jet fuel constantly accumulated on our decks and porches in the form of small, black, oily particles. One can only imagine what harm the fumes from the fuel might have.

Because of this experience, I urge you to rule that the Airport's Draft Environmental Impact Report (DEIR) and Environmental Assessment (EA) are inadequate and do not meet legal standards.

Generally, the DEIR lacks a stand-alone, nontechnical description and analysis of the Project and its alternatives, and lacks an adequate assessment of its potential environmental impacts and mitigation measures. For example, it has multiple pages of acronyms and refers to documents that are not explained or included in the Appendix. This violates 301 Code of Massachusetts Regulations Section 10.07(4). It fails to consider the Airport's plan to "support future growth of airport operations" and what that means for abutting neighborhoods and wildlife habitat.

The specific defects in the DEIR and EA include failure to adequately consider the topics below.

Existing Environment
The DEIR does not adequately describe the "Existing Environment," in violation of 301 Code of Massachusetts Regulations 11.07(6)(g). It ignores the rapid, unregulated changes in topography in the surrounding area caused by sand and gravel mining operations around the Airport. These operations have the potential to change the flow of water above and below ground. They increase the potential contamination of the underground drinking water aquifer by removing the natural filtration provided by trees, vegetation and sand and gravel. The ongoing forest clear-cutting on the Airport Site also potentially impacts groundwater quality. The DEIR does not contain an analysis of geology and soils and does not describe surrounding land alterations, including earth removal.

The DEIR does not describe the role of the adjacent Myles Standish State Forest in supporting wildlife and public recreation, the benefits of this contiguous open space, and how it will be impacted.

Drinking water: federally designated Sole Source Aquifer
A major flaw in the DEIR is the failure to consider the likely impacts, direct or indirect, to the Plymouth Carver Aquifer, a sole source drinking water aquifer designated under the Safe Drinking Water Act. See, 301 Code of Massachusetts Regulations, Section 11.06

The DEIR states that the Plymouth Carver Aquifer "is considered a Resource Not Affected and is dismissed from further consideration." DEIR section 4.2. This is unsupported by scientific evidence.

The Town's 2019 water supply master plan states the Airport "is located adjacent to the Zone II area [protection area] for the Federal Furnace Well and could be a potential source for per and polyfluoroalkyl substances (PFAS)." PFAS is a chemical that causes health problems, including cancer. The Town's report states the Town should be doing more to protect the drinking water aquifer. It states, "Considering how susceptible the [Town's drinking water] sources are to contamination; it is recommended that a more stringent groundwater protection district be developed." The Town consistently ignores this warning from its own master plan. The Town has recently allowed major industrial and commercial projects to be built in and immediately adjacent to aquifer protection districts including in West Plymouth where the Airport is located. It is allowing sand and gravel operations in and near aquifer protection districts, including car dealerships, a car wash, and an automotive service center that discharges runoff to the groundwater. The DEIR must include a hydrological study of groundwater flow and water quality sampling.

The Airport discharges stormwater runoff to the drinking water aquifer via stormwater basins. Additional stormwater will be discharged with the expansion. There is no evidence in the DEIR that the Airport has properly operated and maintained the on-site stormwater runoff system.

Wildlife and Wildlife Habitat
The DEIR's description of the impacts to wildlife and wildlife habitat is incomprehensible, confusing and not provided in nontechnical language. It refers to multiple past permits, plans and ongoing activities allegedly authorized by the Natural Heritage and Endangered Species Program (NHESP) for the Site. It fails to include the permits, plans and reports in the Appendix. It does not provide an adequate description of how the Massachusetts Endangered Species Act (MESA) works, what Priority Habitat is for each of the species and does not adequately explain the alleged mitigation for the elimination of acres of wildlife habitat. It does not have an adequate history of how the Airport has impacted wildlife and wildlife habitat including species protected under MESA and the federal Endangered Species Act (ESA). The DEIR's conclusion that no Biological Opinion is needed under NEPA and the federal ESA is erroneous.

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businesses." The Airport must test current air pollution near the Airport and guarantee that the fumes from the Airport are not harming people now or in the future.

Noise and Light Pollution
The DEIR does not measure current noise impacts in nearby homes and neighborhoods. It does not state how noise specifically will increase in the future as a result of the Airport's long term plan to add more jet traffic and expand airport operations. Residents report that the Airport violates its hours of operation causing unpermitted noise pollution. The DEIR does not adequately address light pollution.

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The DEIR claims many of the impacts on nearby communities are merely "temporary" during the construction period. This is not supported by objective evidence.

The DEIR claims that the Airport expansion benefits the Environmental Justice communities in various ways. This includes "benefits" from "improved safety and efficiency, construction jobs and economic enhancement." The claims of economic benefits are not credible or supported by any evidence. In particular, the Environmental Justice communities include over-age 55 residents in mobile home parks. There is no evidence that these residents will be provided with construction jobs or gain any economic benefit from the Airport expansion. Will over-age 55 residents be working at construction jobs at the Airport during the temporary construction period?

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The DEIR fails to document proper consultation under the National Historic Preservation Act, Section 106, fails to document consultation with Herring Pond Wampanoag Tribe of Plymouth, and fails to provide an adequate opportunity for Native Americans to participate in the process.

For these reasons, I request that you find that the DEIR does not adequately comply with the May 26, 2023 MEPA Certificate # 16692 or with the MEPA statute and regulations at 301 CMR. 11.00
*****

Ellen Sturtevant
ejs709@yahoo.com
9 Shetland
Plymouth,, Massachusetts 02360

The DEIR and EA for the Plymouth Airport Expansion Are Inadequate

Julia Maguire <noreply@adv.actionnetwork.org>
Fri 1/12/2024 8:45 AM
To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

Dear state and federal officials:

As a young mother, I worry about the impact this would have on drinking water and air pollution and how it would affect my small children long term. Not only that, the noise can be loud and scary for a little one when planes are flying low over our home (which we already experience).

I urge you to rule that the Airport's Draft Environmental Impact Report (DEIR) and Environmental Assessment (EA) are inadequate and do not meet legal standards.

Generally, the DEIR lacks a stand-alone, nontechnical description and analysis of the Project and its alternatives, and lacks an adequate assessment of its potential environmental impacts and mitigation measures. For example, it has multiple pages of acronyms and refers to documents that are not explained or included in the Appendix. This violates 301 Code of Massachusetts Regulations Section 10.07(4). It fails to consider the Airport's plan to "support future growth of airport operations" and what that means for abutting neighborhoods and wildlife habitat.

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For these reasons, I request that you find that the DEIR does not adequately comply with the May 26, 2023 MEPA Certificate # 16692 or with the MEPA statute and regulations at 301 CMR. 11.00
*****

Julia Maguire
julia22murphy@gmail.com
28 Musket Rd
Plymouth, Massachusetts 02360

The DEIR and EA for the Plymouth Airport Expansion Are Inadequate

Pamela Large Glasgow <noreply@adv.actionnetwork.org>
Mon 1/15/2024 7:42 PM
To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

Dear state and federal officials,

Please ensure the impact study consisted for the Plymouth Airport meets legal standards and regulations so that my neighbors and I in West Plymouth may have minimal impact on our quality of life.

I urge you to rule that the Airport's Draft Environmental Impact Report (DEIR) and Environmental Assessment (EA) are inadequate and do not meet legal standards.

Generally, the DEIR lacks a stand-alone, nontechnical description and analysis of the Project and its alternatives, and lacks an adequate assessment of its potential environmental impacts and mitigation measures. For example, it has multiple pages of acronyms and refers to documents that are not explained or included in the Appendix. This violates 301 Code of Massachusetts Regulations Section 10.07(4). It fails to consider the Airport's plan to "support future growth of airport operations" and what that means for abutting neighborhoods and wildlife habitat.

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For these reasons, I request that you find that the DEIR does not adequately comply with the May 26, 2023 MEPA Certificate # 16692 or with the MEPA statute and regulations at 301 CMR. 11.00
*****

Pamela Large Glasgow
pam1217@yahoo.com
29 Cooke Rd
Plymouth, Massachusetts 02360

The DEIR and EA for the Plymouth Airport Expansion Are Inadequate

Christina Sheehan <noreply@adv.actionnetwork.org>
Tue 1/16/2024 9:21 AM
To:Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Analyst Nicholas Moreno,

Dear state and federal officials:

As a West Plymouth resident over the last 16 years, I urge you to rule that the Airport's Draft Environmental Impact Report (DEIR) and Environmental Assessment (EA) are inadequate and do not meet legal standards.

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Christina Sheehan
christina.sheehan@gmail.com
83 Esta Road
Plymouth , Massachusetts 02360