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December 16, 2024

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS ON THE FINAL 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, 2024

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 Final Environmental Impact Report (FEIR) and hereby determine that it **adequately and properly** complies with MEPA and its implementing regulations.

Project Description

As described in the FEIR, 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. According to the FEIR, 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-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. The Draft Environmental Impact Report (DEIR) was intended to serve as the Draft Environmental Assessment (EA) under NEPA, and was published for comment to assist in determining whether the project would result in a Finding of No Significant Impact. However, following issuance of the Certificate on the DEIR, the FAA requested that the Airport separate the MEPA and NEPA processes, such that the Final EA under NEPA will have the FEIR as an appendix and any substantive comments on the FEIR, and relevant to the EA's Proposed Action, will be addressed in the Final EA.[1] The Final EA is anticipated to be published in December 2024. 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 FEIR 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; alternatively, a new ENF for additional 5-year ACIPs could be considered. Prior to making future filings, the Airport should consult with the MEPA Office to clarify anticipated filing requirements. According to the FEIR, if an NPC is required, the Airport will comply with all NPC filing requirements in effect at the time the NPC is filed, including the preparation of supporting studies or technical analyses based on the nature of the project change.

According to the FEIR, 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

[1] Confirmed by email from Nathan Rawding (Epsilon Associates) to Nicholas Moreno (MEPA) on December 4, 2024.

[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.

  - 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.

Projects identified in the ACIP are anticipated to be constructed over five years as funding is allocated as part of the FAA and Massachusetts Department of Transportation (MassDOT) Aeronautics Division capital planning cycle. The ACIP originally anticipated these projects to be constructed between 2023 and 2027. However, there have been minor changes to the phasing of these projects based on permitting timelines and funding availability; thus, projects are now anticipated to be constructed between 2025 and 2029. While details of the Gate 3 Taxilane reconstruction and Runway 6-24 reconstruction projects have been disclosed during this MEPA review, the FEIR asserts that these project components are consistent with the definition of a "Replacement Project," and therefore, would be exempt from MEPA review .[6] Specifically, the FEIR states that reconstruction as proposed for these projects will consist of the removal of existing pavement and base material, and replacement thereof due to normal wear and tear of these areas of the Airport, similar to roadway repaving. The runway pavement will then be restriped in accordance with current FAA design criteria. As noted, the FEIR nevertheless does provide additional details about the potential impacts associated with these activities.

The FEIR 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. As part of the development of the TMPU, the Airport evaluated baseline operations and forecasted future operations. In 2021, baseline operations consisted of 61,021 flights, of which 41,494 (68%) were single-engine piston aircraft and 19,527 (32%) were multi-engine, turboprops, turbojets, and helicopters; a total of105 aircraft are identified as "based aircraft" at the Airport. Future operations forecasted to 2041 project a total of 66,489 flights, of which 44,932 (68%) are expected to be single-engine piston aircraft and 21,557 (32%) are expected to be multi-engine, turboprops, turbojets, and helicopters; however, the number of "based aircraft" is projected to decrease from 105 to 98 aircraft from 2021 to 2041.[7] While the Airport anticipates an overall increase in annual flights (based on the estimated annual growth rate of 0.43% used in the TMPU) between 2021 and 2041, the FEIR states that this growth cannot be attributed to the project activities proposed herein. The FEIR states that the Airport is not seeking to increase Airport capacity but rather, to meet airfield geometry standards, recommendations for runway length, and current FAA safety and design criteria standards for the current suite of aircraft operating at the Airport. In particular, the Runway 6 project is specifically designed to meet FAA safety standards for safer approach and takeoff distances, as related to the Airport's design aircraft (Dassault Falcon 2000).

[6] As defined in 301 CMR 11.02, a Replacement Project means "Any Project to repair, replace, or reconstruct a previously authorized use of or Project on a Project site that does not: (a) increase potential environmental impacts or need additional or changed environmental Permits; or (b) result in any substantial (10% or more) Expansion of the use or Project, provided that the previous use or Project has not been discontinued for more than three years and that the Expansion does not meet or exceed any review thresholds."

[7] This represents an increase of 8.3% in single-engine aircraft and an increase of 10.4% in multi-engine, turboprops, turbojets, and helicopters from 2021 to 2041.

Project Site

The Airport is located on approximately 758 acres in the Towns of Plymouth and Carver.[8] 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.[9] Existing developed land within the Airport Zone includes a mixture of cranberry bogs, office space associated with the Airport, 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.[10] As described below, the FEIR 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.

[8] The total acreage of the Airport is 758 acres, of which 41.5 acres have a permanent conservation restriction.

[9] 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.

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

Changes Since the DEIR

Since the filing of the Draft Environmental Impact Report (DEIR), the Airport has been working to address comments and concerns raised by federal and state agencies. In particular, the FEIR identifies the following changes:

- **Site Grading and Stormwater Management** – In accordance with the Scope, a proposed stormwater management system has been conceptually designed and is newly presented in the FEIR. The stormwater management system has been sized to attenuate post-development peak discharge rates up to the present-day 100-year storm event (7.49 inches); will consist of a variety of Low Impact Development (LID) design measures, including vegetated filter strips and infiltration basins; and will tie into areas of new impervious surface through updated site grading.
- **Expanded Alternatives Analysis** – In accordance with the Scope, the Proponent expanded the alternatives analysis to include an evaluation of alternatives for additional projects proposed as part of the ACIP.
- **Groundwater Analysis** – In response to comments provided on the DEIR, the Proponent conducted an analysis of groundwater depth, contours, and flow directions beneath the Airport. The analysis also evaluated the potential for a release of hazardous or toxic substances from Project activities and included an evaluation of existing groundwater conditions based on on-site and off-site testing conducted to date.

Although the design of the projects identified in the ACIP have not substantially changed from the DEIR, the development of a proposed stormwater management system and quantification of impacts associated with each of the different project components have resulted in a modest increase in overall environmental impacts as documented below.

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 21.16 acres of land and the creation of 2.49 acres of impervious surface.[11] 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; these impacts are the same as those reported in the DEIR. Additional impacts may be associated with future projects to be conducted under the TMPU after the 5-year ACIP period.

Measures proposed to avoid, minimize, and mitigate environmental impacts include the use of erosion and sedimentation controls during construction; construction of a stormwater management system; use of construction-period Best Management Practices (BMPs) to minimize noise, air, and water quality impacts; expansion and restoration of grassland habitat for state-listed species; and restorative plantings for temporarily disturbed areas.

[11] This represents a 14.49-acre increase in land alteration and mapped Priority Habitat from the DEIR, primarily due to the development of a stormwater management system, not previously designed or described in the DEIR, and site grading.

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.[12] 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). The DEIR served as the Draft EA under NEPA, and was published for comment to assist in determining whether the project would result in a Significant Impact. However, following issuance of the Certificate on the DEIR, the FAA requested that the Airport separate the MEPA and NEPA processes, such that the Final EA under NEPA will consist of a combined Draft EA/DEIR and FEIR document. Additional permitting may be needed for future work under the TMPU.

The Project 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 FEIR

The FEIR included a project description, existing and proposed conditions plans, revised estimates of Project-related impacts, an updated alternatives analysis, drinking water reports, conceptual stormwater design plans, and an identification of measures to avoid, minimize and mitigate environmental impacts. The FEIR provided a response to comments on the DEIR and draft Section 61 Findings.

Alternatives Analysis

In accordance with the Scope, the FEIR includes an expanded alternatives analysis that evaluates alternatives for the two proposed aviation hangars and the expanded sewer main. The FEIR states that No-Build Alternatives were also evaluated for each project, which consisted of no change in the length of the existing sewer main or construction of new hangar space. According to the FEIR, these alternatives were dismissed as the existing sewer main does not currently service the entire Runway 6

[12] The DEIR previously indicated that the Project would require a Water Quality Certification from the Massachusetts Department of Environmental Protection (MassDEP); however, the FEIR notes that this was erroneously included in the filing as the Project will not result in any impacts to wetlands or waterways.

hangar area and the existing demand for new hangars exceeds the current available space. As noted above, the FEIR maintains that the Gate 3 Taxilane reconstruction and Runway 6-24 reconstruction projects are consistent with the definition of a "Replacement Project" under MEPA. As the proposed work would solely consist of the removal of existing pavement and base material, and in-kind replacement thereof due to normal wear and tear of these areas, the FEIR did not evaluate other alternatives beyond conducting or not conducting these activities.

Sewer Main Expansion

Alternative 1 would consist of installing wastewater holding tanks within and adjacent to the existing and proposed buildings/hangars along the Runway 6 hangar area. Although this alternative would not increase wastewater flows to the on-site treatment facility and could result in reduced land alteration, the holding tanks would need to be pumped out monthly which would increase vehicular traffic to/from the Airport. In addition, upgrades to the existing sewer main would still be required to address existing deficiencies in the system. Therefore, this alternative was dismissed.

Alternative 2 would consist of the construction of a 1,400 lf subsurface sewer main from the Runway 6 hangar area to the treatment plant along the most direct route. While this alternative would take the most direct route to the treatment plant, it would require an approximately 10-ft-wide clearance through forested uplands, resulting in 14,000 sf of tree clearing and permanent maintenance of the utility corridor as a grassed area. This alternative would result in the greatest environmental impacts and would result in the highest construction and maintenance costs of the alternatives considered. Therefore, this alternative was dismissed.

The Preferred Alternative would consist of the construction of a 3,000 lf subsurface sewer main adjacent to the Gate 6 Access Road. Under the Preferred Alternative, an eight-inch diameter sewer main would be installed in an excavated trench adjacent to the existing access road. While the Preferred Alternative would require the temporary alteration of 30,000 sf of land and extend for a greater length, it will utilize existing, maintained rights-of-way and following installation, the area would be restored to its preexisting condition.

Hangar Construction

Alternative 1 would consist of the construction of one new aircraft hangar located along the northside of Runway 6 and Taxiway E. While this alternative would reduce the extent of new hangar construction, it would require the alteration of over one acre of mapped rare species habitat in order to construct the hangar and extend the existing access road, as well as relocate an existing stormwater basin. In addition, this alternative would create new areas of impervious surface within high quality grassland bird habitat. Therefore, this alternative was dismissed.

The Preferred Alternative would consist of the construction of two new aircraft hangars located along the southside of Runway 6 and Taxilane A. While the Preferred Alternative would involve more new hangar construction, as compared to the other alternative considered, it would utilize part of the "run up" area at the existing end of Runway 6 and can easily connect into available utilities such as water, electric, stormwater and sewer as well as connect to existing access roads with minimal additional land alteration. In addition, while work is proposed in upland grassland habitat, this habitat is marginal

due to the location proximate to the existing access road and taxiways, and nesting birds have not been observed in this area during prior grassland bird surveys.

Environmental Justice (EJ)

As noted above, 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. 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 FEIR describes the public involvement plan that the Project has undertaken to engage with EJ Populations. In accordance with the Scope, the Proponent developed an updated "EJ Distribution List," using information obtained from the MEPA office, which included a list of Community Based Organizations (CBOs) and tribes/indigenous organizations, for purposes of circulating the FEIR prior to filing. Since the filing of the DEIR, the Airport has provided an update on the design and status of the Project at the Carver Planning Board meeting on January 9, 2024, and at the Plymouth Select Board meeting on March 14, 2024. The Airport also held an evening, in-person public meeting to discuss the status of the Project and the information presented in the FEIR on December 2, 2024, at the Plymouth Municipal Airport Administration Building, which was attended by 23 members of the public.[13] In advance of the meeting, the Proponent published a notice on the Town of Plymouth's website and sent out a digital mailing to a list of abutters and stakeholders, including information on the date, time, and location of the meeting.[14] The Airport also maintains a Project specific e-mail address for communication about the Project.[15]

The DEIR previously provided a qualitative air quality analysis 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, regulated under the Federal National Ambient Air Quality Standards (NAAQS), 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). Based on this analysis, the DEIR concluded that the Project would not result in additional emissions that would result in an exceedance of the NAAQS. The DEIR also included a noise analysis which evaluated noise levels associated with existing airport operations, as well as potential changes as a result of the Project. The noise analysis was conducted using the Falcon 2000 aircraft, which is the design aircraft for the Airport, and evaluated the change in extent of the 65 decibels (dB) and 70dB noise contours. 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. According to the FEIR, these analyses were based on Airport operations (flights) forecasts used in the TMPU to evaluate changes in operational levels based on future scenarios. While the Scope required these analyses be updated to account for the increase in airplane activity that is anticipated from the proposed hangar expansion, the FEIR states that the forecast analysis did not take individual projects into consideration because the projects do not propose to expand Airport capacity.

[13] According to the FEIR, this included 15 in-person attendees and 8 remote attendees.

[14] Available at: https://www.plymouth-ma.gov/calendar.

[15] PlymouthMAAirportRW6EA@dubois-king.com

The Proponent provided further clarification[16] to indicate that the hangars are anticipated to be leased by existing users of the Airport who may be using "tie-down" space at the Airport to park aircraft in lieu of covered hangar space. The new hangars meet an immediate demand for aircraft parking, and are not tied to future projections of flights at the Airport.

As noted above, the Proponent has developed a conceptual stormwater management system that is designed to attenuate post-development peak discharge rates from new impervious areas up to the current 100-year storm event (7.49 inches). The FEIR states that since existing conditions will be improved by the proposed Project by providing additional treatment and infiltration capacity for stormwater runoff, flooding risks are not anticipated to result from or be exacerbated by the Project on-site or for nearby EJ Populations, including under future climate conditions. In addition, as discussed below, while the expansion of the sewer main is anticipated to result in a minor increase (30 to 60 additional gpd) in wastewater flows to the on-site treatment facility (which discharges treated effluent to groundwater), it is not expected to have any impact on groundwater or pollutant loading.

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 FEIR, prior hydrologic studies indicate that groundwater generally moves in a north to south direction from Middleborough toward Wareham, and in a west-to-east direction, toward Plymouth Harbor. Multiple studies of groundwater at the Airport have been conducted, with the most recent study primarily associated with a construction project at the wastewater treatment plant in 2012. These studies, which included testing soils and groundwater, and establishing groundwater contours and flow direction of groundwater at the Airport, utilized monitoring wells placed throughout the Airport. Data collected from the monitoring wells indicated that there is a local groundwater divide on the Airport. In the eastern portion of the site, groundwater flow is towards the southeast and in the western portion of the site, groundwater flows towards the southwest. According to the FEIR, there are no Interim Wellhead Protection Areas or Zone II Protection areas on Airport property. However, the Town of Plymouth Public Water Division operates 13 public water supply wells, including the Federal Furnace Well which is the closest well to the Airport.[17] The public water supply wells in the Town of Carver are further away from the Airport property than the Federal Furnace Well. There are also numerous public water supplies mapped within five miles of the Airport, along with their individual wellhead protection areas.

As noted below, the Town of Plymouth conducts annual testing of its public water supply wells for a variety of regulated and unregulated substances. Testing conducted in 2023 did not indicate elevated levels of nitrates or other substances that could be associated with effluent discharges, including those from the Airport's treatment facility. The FEIR states that the Town of Plymouth also started testing public water supply wells for Per & Polyfluoroalkyl Substances (PFAS) in 2021. Based on the results of the testing conducted to date, PFAS has not been detected in the Federal Furnace Well.[18] The sampling information also included routine mineral/chemical testing, and the only

[16] Email sent to Nick Moreno, MEPA Office, on December 16, 2024.

[17] The FEIR states that the Zone II Protection Area for the Federal Furnace Well extends to approximately 150 ft outside the Airport's northeastern property line.

[18] The latest PFAS testing was completed by the Plymouth Water Department in January of 2024, and no detectable amount of any PFAS chemicals were found at Federal Furnace Well.

chemicals that were over their "secondary maximum contaminant levels" were Iron, Manganese, and Aluminum; all other chemicals/minerals tested for were within regulated limits.[19] In addition, the Airport does not have a history of using or accidental releases of PFAS containing Aqueous Film Forming Foam (also known as firefighting foam) or storage of such materials at the Airport. The FEIR states that the Airport has conducted groundwater monitoring periodically for prior projects but does not maintain any actively sampled wells at this time. However, the Airport does maintain a Groundwater Management Plan, which includes procedures and policies to minimize potential impact on groundwater from Airport activities, as well as a Spill Prevention Control and Countermeasures Plan to ensure a release of hazardous or potentially toxic materials does not occur and the procedures should one occur. These plans apply to both ongoing Airport operations as well as any new construction activities performed at the Airport. In addition, a spill prevention and control plan will be prepared and included in the Stormwater Pollution Prevention Plan (SWPPP) to be developed as part of the NPDES permitting process.

The FEIR 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. In particular, the Airport constructed a fuel farm in 2019 with an on-site fuel capacity of 20,000 gallons of Jet A fuel and 12,000 gallons of Avgas, stored in two above-ground storage tanks. Fuel storage and refueling are limited to the apron areas on the northern side of the Airport near South Meadow Road and no aircraft or pavement de-icing is currently being performed.[20] Hazardous materials used for operation and maintenance of aircraft, runways, and taxiways also include fuels, degreasers, and aviation lubricants and oils. In addition, wastewater from aircraft or vehicle washing has the potential can contain high concentrations of oil and grease, phosphates, and suspended solid loads. Washing is only allowed in the designated washing/cleaning areas which are graded to direct water to an underground storage tank that is pumped on an as needed basis. The FEIR states that even with the potential for a release of hazardous or potentially toxic materials, there has only been a single documented release 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 in accordance with M.G.L. c 21E, and the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000).

Land Alteration, Impervious Surfaces, and Stormwater

In accordance with the Scope, the FEIR includes details regarding the proposed grading plan and stormwater management system, based on a Low Impact Development (LID) design approach, which will be installed as part of the Project. As noted above, the FEIR includes revised estimates of the anticipated permanent and temporary land alteration impacts associated with the Project. While the project will still result in the permanent alteration on 2.49 acres of land (through the conversion of vegetated grassland to impervious surface), it will result in an increase in temporary impacts due to site

[19] Iron (Fe), manganese (Mn), and aluminum (Al) primarily enter drinking water through natural geological sources, where water percolates through soil and rock, dissolving minerals containing these elements, most commonly found in deeper wells. There are no known sources of these secondary contaminants at the Airport.

[20] The Airport confirmed via email from Nathan Rawding (Epsilon Associates) to Nicholas Moreno (MEPA) on December 5, 2024, that *Table 3-1 List of Potential Pollutants* provided in the FEIR, erroneously includes the use of de-icing fluids (glycol) and that no de-icing activities occur at the Airport.

grading (including 12 acres associated with the Runway 6 extension and 5.7 acres associated with the Runway 6-24 reconstruction project). Approximately 0.97 acres will also be permanently altered to construct the stormwater management system, the design of which was not previously presented in the DEIR.

In order to mitigate increases in post-development peak discharge rates as a result of the new impervious surfaces, the stormwater management system has been designed to include 50-ft-wide vegetative filter strips; grassed swales; sediment forebays; grassed channels and infiltration ponds to remove total suspended solids (TSS); and above-ground infiltration basins. Runoff from the extended runway, taxiways, taxilanes, and run-up apron will initially be directed to the vegetated filter strips or swales prior to being conveyed to a sediment forebay and discharged into an infiltration pond or basin. The Project may also 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. While these stormwater control measures are not currently proposed, leaching basins and infiltration chambers have been extensively utilized throughout the airport on previous projects. In addition, for the two new aircraft hangars, the proposed new apron areas will be considered Land Uses with Higher Potential Pollutant Loads (LUHPPL) due to the potential for runoff to mix with aviation fuels. In these areas, structural best management practices (BMPs), potentially including oil/water separators and subsurface infiltration units, will be installed, as necessary. While the FEIR states that the aboveground stormwater control measures do not meet the definition of an Underground Injection Control (UIC), per 310 CMR 27.00, should the Airport install any subsurface infiltration systems, said systems will be designed with the required pre-treatment and registered with MassDEP as necessary.

According to the FEIR, the Proponent evaluated precipitation depth and peak intensities, utilizing NOAA Atlas 14 precipitation data (2yr – 3.44”; 10yr – 5.00”; and 100yr – 7.49”) for a 24-hour storm event as well as the 24-hour precipitation depths associated with a 2050 10-year (6.1”) and 2070 25-year (7.9”) storm event projected by the Climate Resilience Design Standards Tool (the “MA Resilience Design Tool”). The stormwater management system has been designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (7.49 inches) with at least 80% TSS removal. While the system is not currently designed to manage the future (2070) 25-year storm event, which would require upsizing the discharge pipes and infiltration basins, the Airport maintains adequate amounts on open areas to accommodate the expansion and/or improvement of the proposed stormwater management structures should the need arise based on future climate conditions.

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 proposed extension of sewer main involves the installation of subsurface sewer lines adjacent to the existing access roadway right-of-way from the existing southerly hanger on Taxilane A to proposed hangars at Taxilane A apron. According to the FEIR, the Airport’s existing on-site wastewater treatment plant is located to the west of Runway 33. Associated with the leach field for the wastewater treatment plant are three groundwater monitoring wells that are monitored quarterly for specific conductance, pH, total nitrogen, and nitrate nitrogen. The plant was constructed in 2003 and is permitted under a Groundwater Discharge Permit (Permit No.720-0) from MassDEP, to ensure that effluent discharges do not negatively impact public health or public drinking water supply, with an operating capacity of 25,000 gallons per day (gpd). Groundwater testing

conducted in 2012 was evaluated by the Town of Plymouth Sewer Division, which found that the Airport was operating in compliance with the issued Groundwater Discharge Permit. In addition, drinking water testing conducted by the Town of Plymouth in 2023 did not indicate elevated levels of nitrates or other substances that could be associated with effluent discharges.

The FEIR states that the current wastewater flows total approximately 5,000 gpd, indicating there is sufficient capacity to treat additional flows. While expansion of the sewer main will upgrade existing substandard systems, it will also facilitate the construction of the two proposed hangars. Based on the proposed size of the two new hangars, they are each anticipated to hold a single aircraft with a capacity of three to six passengers per aircraft. As identified in 310 CMR 15.203: System Sewage Flow Design Criteria, estimates of wastewater design flows are provided for different building types (residential/commercial) and uses. Within the commercial category, airport wastewater design flows are listed as five gpd/per passenger, which would result in an increase in wastewater flows of approximately 30-60 gpd.

Wetlands

As noted above, wetland resource areas are located on and adjacent to the Airport. According to the FEIR, the Project will not result in any wetland impacts; however, work within the 100-ft buffer zone will be required. In particular, a light fixture used for the navigational approach to Runway 6 will be shifted southwesterly with the associated runway extension. This will result in 13,867 sf of impacts to the 100-foot buffer zone to an IVW, resulting from the installation of the light fixture and ongoing mowing to keep the area free of obstructions. As impacts to IVW are not subject to the Wetlands Protection Act, the Plymouth Conservation Commission will review the project for its consistency with local bylaws only.

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 (MESA; M.G.L c. 131A) and its implementing regulations (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. Portions of the Airport are currently managed to maintain habitat for state-listed species in accordance with the provisions of the existing MESA CMP (018-329), which will be amended as part of the Project.

According to the FEIR, based on revised calculations of impacts associated with temporary and permanent alterations to mapped habitat, the Project is anticipated to impact 21.16 acres of mapped Priority Habitat and will likely result in a Take (321 CMR 10.18 (2)(b)) of state-listed species.[21] Of this area, 2.49 acres will result in a permanent loss of habitat due to new pavement and impervious surfaces

[21] This represents an increase of 14.49 acres from the DEIR.

(net of pavement removals); 0.97 acres will result from the creation of stormwater management structures; and 17.7 acres will result in temporary impacts from construction and grading activities, which will be restored (with appropriate seed mix) following construction. While permanent impacts are primarily associated with the extension of Runway 6, taxiway extensions, and hangar development, the FEIR states that grassland habitat impacts from the new stormwater management areas are calculated as an impact; however, stormwater areas will be restored with grasses after construction and continue to provide certain habitat benefits to grassland bird species.

The FEIR states that as part of the mitigation efforts, the Airport proposes to update the existing Airport-wide Grassland Habitat Management Plan (GHMP), implemented as part of the CMP. Projects since the development of the GHMP have used a predefined mitigation approach with established ratios and modifying factors depending upon habitat quality impacted and the characteristics of the proposed grassland areas in order to achieve a "net benefit" for the protected species at the Airport. Modifiers to the mitigation ratios take into consideration whether the impacted area is frequently or infrequently mown. The GHMP also addresses temporary impacts by requiring mitigation at a 1:1 ratio for the temporal loss of habitat within areas that will be re-established upon project completion if work is conducted during the nesting season. Mitigation will be provided in the form of "banked grassland mitigation areas" that are in surplus of the areas that have previously been committed to as mitigation. The FEIR notes that existing grassland habitat at the end of Runway 6 was previously proposed as mitigation for prior projects. Since the permanent impacts (associated with new pavement) are proposed within these existing mitigation areas, a higher mitigation ratio for the impacts is anticipated to be required (possibly as high as a 6:1 mitigation ratio).

According to the FEIR, the Airport currently anticipates the need to provide 29.8 acres of mitigation as a result of the Project's impacts. The anticipated mitigation requirements are anticipated to be covered by the existing amount of "banked grassland mitigation areas" that is available in the Airport's mitigation bank. The FEIR also states that impacts to state-listed bird species during construction will be minimized through the use of the following avoidance and minimization measures:

- Conducting initial site reconnaissance prior to the start of the nesting period to ensure that there is no evidence of usage of the grassed work areas within the project site as nesting or foraging habitat;
- Mowing grassed areas within the project site in advance of the nesting period for grassland bird species (May 1 to July 31), thereby making these areas undesirable as nesting habitat;
- Conducting work outside the nesting period for grassland bird species (May 1 to July 31), to the maximum extent feasible;
- Monitoring work areas to determine whether nesting locations are present so that they can be avoided until the birds have fully fledged, if work must occur within the nesting period;
- Minimizing the possibility of trucks and construction equipment crossing through the Priority Habitat and existing grassland habitat management areas; and
- Implementing a post-construction grassland bird monitoring plan, utilizing existing protocols from prior CMP-required monitoring efforts.

During permitting, NHESP will determine the exact necessary mitigation needed to provide a net-benefit for grassland bird species, consisting of the use of "banked grassland mitigation areas" in accordance

with the Airport's existing GHMP, new mitigation areas with the Airport boundaries, as well as the use of minimization and avoidance measures.

Hazardous Waste

As noted above, 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 FEIR includes the following table detailing each of these potential pollutants:

Industrial Activity	Associated Pollutants
Fuel Delivery and Transfer	Jet A fuel, low lead fuel, gasoline, and diesel fuel
Vehicle, Aircraft, and equipment maintenance	Fuels, oils, hydraulic fluids, solvents, lubricants, sealants, and cleaning compounds
Deicing activities	Deicing fluids (glycol)
Vehicle washing	Fuels, oils, and cleaning solvents
Snow removal activities	Sediments and salts

According to the FEIR, the Airport has a newly constructed fuel farm with the on-site fuel capacity to hold 20,000 gallons of Jet A fuel and 12,000 gallons of Avgas fuel in two above-ground storage tanks located on the northern side of the Airport near South Meadow Road. The FEIR states that the Airport employs several techniques to ensure proper storage and handling, including providing adequate space to facilitate material transfer and easy access for inspections; storing containers, drums, and bags away from direct traffic routes to prevent accidental spills; stacking containers according to manufacturers' instructions to avoid damaging the containers from improper weight distribution; and storing containers within spill pallets or upon wooden pallets, or similar devices, to prevent corrosion of the containers which can result when containers come in contact with moisture on the ground. All fuel is full serve only and is delivered directly to each aircraft via a fuel truck. Fueling operations are also only conducted on apron areas In addition, washing of aircraft and vehicles is also only permitted in designated washing/cleaning areas which are graded to direct water to an underground storage tank.

Climate Change

Adaptation and Resiliency

As noted above, the Airport has designed a stormwater management system to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (7.49 inches). In accordance with the Scope, the Airport also evaluated 24-hour precipitation depths associated with a 2050 10-year (6.1") and 2070 25-year (7.9") storm event recommended by the MA Resilience Design Tool. While the stormwater management system as proposed does not appear to be resilient to future (2070) conditions, the Airport has committed to expand the stormwater control measures, as necessary, to improve water quality and increase site resilience in response to higher experienced rainfall amounts resulting from climate change. In order to increase the capacity of the proposed stormwater treatment system from the current 100-year storm (7.49") to accommodate the future (2070) 25-year storm (7.90"), the northern collection system would require the piping to be increased in size from a 24-inch diameter pipe to a 30-inch diameter pipe. Additionally, the infiltration pond at the end of Runway 6

would need to be enlarged from 45,000 cubic feet (cf) to 49,546 cf (an increase of 10%). The FEIR states that this expansion would be dependent on future funding availability.

Construction Period

All construction and demolition activities should be managed in accordance with applicable MassDEP's 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). The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle construction and demolition (C&D) debris to the maximum extent.

Mitigation & Section 61 Findings

The FEIR includes a separate chapter summarizing proposed mitigation measures and includes draft Section 61 Findings for Participating Agencies. It contains commitments to implement these mitigation measures, identifies the parties responsible for implementation, and includes a schedule for implementation. As described in the FEIR, the Proponent has committed to implement the following measures to avoid, minimize and mitigate Damage to the Environment:

Environmental Justice (EJ) / Public Health

- Continue to encourage pilot participation in the Airport's formal noise abatement program 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.
- Continue to implement the Groundwater Management Plan, which includes procedures and policies to minimize potential impact on groundwater from Airport activities, as well as a Spill Prevention Control and Countermeasures Plan to ensure a release of hazardous or potentially toxic materials does not occur and the procedures should one occur.

- Ensuring that all wastewater discharges, including any increases associated with the sewer main extension, are within the permitted capacity of the on-site treatment facility and will comply with all permitting standards to protect public health and the drinking water supply.
- Construction of a stormwater management system (including 50-ft-wide vegetative filter strips; grassed swales; sediment forebays; grassed channels and infiltration ponds to remove total suspended solids (TSS); and aboveground infiltration basins) designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (7.49 inches).

Land Alteration, Impervious Surfaces, and Stormwater

- Restoration of temporarily disturbed areas following construction activities with an airport-approved grass seed mix.
- Construction of a stormwater management system (including 50-ft-wide vegetative filter strips; grassed swales; sediment forebays; grassed channels and infiltration ponds to remove at least 80% total suspended solids (TSS); and aboveground infiltration basins) designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (7.49 inches).

Wetlands

- Comply with all Standard and Special Conditions to be included in the Order of Conditions issued by the Plymouth Conservation Commission.
- Prepare and implement a Stormwater Pollution Prevention Plan (SWPPP).
- Protect wetland resource areas from secondary impacts during construction through the implementation of erosion and sedimentation controls, incorporating BMPs.

Rare Species

- Provide 29.8 acres of mitigation for impacts to grassland habitat in order to demonstrate a net-benefit to listed grassland bird species.
- Conduct initial site reconnaissance prior to the start of the nesting period for grassland bird species (May 1 to July 31) to ensure that there is no evidence of usage of the grassed work areas within the project site as nesting or foraging habitat.
- Mow grassed areas within the project site in advance of the nesting period, thereby making these areas undesirable as nesting habitat.
- Conduct work outside the nesting period, to the maximum extent feasible.
- Monitor work areas during the nesting period to determine whether nesting locations are present so that they can be avoided until the birds have fully fledged.
- Minimizing the possibility of trucks and construction equipment crossing through the Priority Habitat and existing grassland habitat management areas.
- Implementing a post-construction grassland bird monitoring plan, utilizing existing protocols from prior CMP-required monitoring efforts.

Hazardous Waste

- Continue to implement the Groundwater Management Plan, which includes procedures and policies to minimize potential impact on groundwater from Airport activities, as well as a Spill Prevention Control and Countermeasures Plan to ensure a release of hazardous or potentially toxic materials does not occur and the procedures should one occur.

- Develop and implement a construction period spill prevention and control plan.

Climate Change

Adaptation and Resiliency

- Restoration of temporarily disturbed areas following construction activities with an airport-approved grass seed mix.
- Construction of a stormwater management system (including 50-ft-wide vegetative filter strips; grassed swales; sediment forebays; grassed channels and infiltration ponds to remove total suspended solids (TSS); and aboveground infiltration basins) designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (7.49 inches).
- Design and site the stormwater control measures such that they can be expanded in the future, as necessary, to improve water quality and increase site resilience in response to higher experienced rainfall amounts resulting from climate change

Greenhouse Gas (GHG) Emissions

- Integrate low-cost energy efficiency measures.
- Install 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 for the proposed hangar space.
- Implement a climate resilient design for the proposed hangars.
- Reduce energy consumption by monitoring the efficiency of heating, ventilation, and cooling systems.

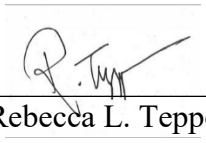
Construction Period

- Develop and implement a construction period spill prevention and control plan.
- Implement mitigation measures to prevent stormwater contamination including among others, use of erosion and sedimentation controls.
- Limit fugitive dust emissions using industry-best practices, such as watering, sweeping, and wheel-washing.
- Reduce potential air emissions through the use of EPA Tier 4 construction equipment or equipment retrofitted with diesel emission control devices, using Ultra Low Sulfur Diesel for all trucks and construction machinery, and minimizing idling.
- Minimize construction period noise impacts to the extent feasible through the use of mufflers, selection of quieter equipment, and minimizing idling.
- Coordinate with the Towns of Plymouth and Carver to discuss transportation-related construction-period mitigation measures including:
    - Establishing designated truck routes to govern how trucks access the project site;
    - Utilizing police details as necessary and as required by to facilitate and maintain safe and efficient passage of vehicles and pedestrians during construction;
    - Avoiding full or partial street closures to the extent possible and limiting any necessary street closures to off-peak hours; and

  - Providing parking for construction workers within the project site, and prohibiting parking along adjacent roadways.
- Revegetate disturbed areas as soon as possible after disturbance (including interim revegetation along roadbeds, once heavy construction is completed).

Conclusion

Based on a review of the FEIR and in consultation with Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. No further MEPA review is required, and the project may proceed to permitting. Participating Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12. As noted, future filings may be required for projects proposed under the TMPU beyond the 5-year period of the ACIP.



December 16, 2024
Date

Rebecca L. Tepper

Comments received:

Comments submitted on the MEPA Public Comment Portal

12/04/2024 Brian Fitzgerald
12/08/2024 Lorilee Strom
12/08/2024 Betty Ludtke
12/08/2024 Mary-Jennifer Hanlon
12/09/2024 Sandy Fosgate
12/09/2024 Brookline Bird Club
12/09/2024 Kayla Almeida
12/09/2024 Lisa Lantagne
12/09/2024 Steven Lantagne
12/09/2024 Community Land & Water Coalition, Carver Concerned Citizens, Save Massachusetts Forests, and RESTORE: The North Woods

Comments submitted by email

217 comment letters beginning with "We ask you to find that the Final Environmental Impact Report…"
12/09/2024 Massachusetts Department of Environmental Protection (MassDEP) Southeast Regional Office (SERO)

RLT/NJM/njm

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16692	Brian	73 Huntington Road	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
12-4-2024	Fitzgerald	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
12-9-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	weabrian@gmail.com	02360	

Comment Title or Subject

Topic: Re: Plymouth Airport Expansion

Comments

Segoe UI | 10 pt | Paragraph

Extensive experience living in the shadow of the Plymouth Airport makes clear that this application should be denied. The airport and its managing bodies have shown insufficient interest in abating the noise pollution, air pollution, and all other environmental impacts of such expansion. Current degradations to property values and quality of life have been ignored by airport management and the government of the Town of Plymouth. With the systemic failure of the Plymouth Airport to responsibly manage its current impact on area communities, demonstrable improvement is required before raising the potential of the facility to more greatly damage the environment.

Attachments

Update Status

Status

Accepted

SUBMIT →

Share Comment

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BACK TO SEARCH RESULTS

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16692	Lorilee	3 Aberdeen	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
12-8-2024	Strom	--	--
Certificate Action Date	**Phone**	**State**	**Status**
12-9-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	lor.strom@verizon.net	02360	

Comment Title or Subject

Topic: Plymouth Airport Expansion

Comments

Segoe UI | 10 pt | Paragraph

NOT ONLY WILL IT NEGATIVELY IMPACT ECOSYSTEM,

PRIVATE JETS ARE SIGNIFICANT CONTRIBUTERS TO CLIMATE CHANGE, AND ONLY BENEFIT THE VERY RICH

Attachments

Update Status

Status

Accepted

SUBMIT

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View Comment

Comment Details

EEA #/MEPA ID
16692

Comments Submit Date
12-8-2024

Certificate Action Date
12-9-2024

Reviewer
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov

First Name
Mary-Jennifer

Last Name
Hanlon

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State
MASSACHUSETTS

Zip Code
02360

Organization
--

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: Plymouth Airport Expansion

Comments

To all it may concern,

Yes the airport has been here before these homes. However, the airport has continued to grow and extend runways, and traffic has increased immensely over the last 40 years.

There is very little control by the town and the management over commercial and private jets. With an extension of the runway, this will allow for an increase in air traffic, encouraging 24/7 traffic… increasing air and noise pollution, increasing sleeplessness and ill heslth effects on neighnors.

The concerns that stuck out to me about this environmental study are that neighnors have asked about soil testing in the residential areas for lead and we have been continuously denied. We have read studies from the EPA on lead containing aviation fuel and residential impacts of said fuel. Airports in other states have found large amounts of lead in the soil in surrounding neighborhoods and our airport opts to do nothing, to ignore the situation. We want lead testing of soil and the population.

Another largely concerning issue is this impact study is done using studies that are greater than 20 years old! In my line of work, studies are considered obsolete after 5 years. We are asking for studies conducted in the last 5 years. We would like the neighborhoods studied for air, lead and noise pollution. Private wells shoukd be tested as well.

Thank you for your time

Attachments

Update Status

Status

Accepted

SUBMIT

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BACK TO SEARCH RESULTS

12/7/2024

Comment on Plymouth Airport extension

We are the Brookline Bird Club which hosts bird walks to the Plymouth airport property during the breeding season. We monitor and enjoy the rare grassland birds which the airport property supports currently. Our efforts are reported to the Cornell University ebird data base. Several of our over 1,000 members also enjoy the property on their own.

We are concerned with the expansion project altering the current property and effecting the species which require the unique environment the Plymouth airport property provides currently. This relates to size of proper habitat, placement of this habitat, flora in the habitat, the food and forging ability in the habitat, and the disturbance during critical times of the habitat.

The Upland Sandpiper, the Vesper and Grasshopper Sparrows have critical size of proper habitat to begin usage. When conditions are ideal, usually more than one bird are present. For example, with the current configuration Plymouth airport property has 4 Upland Sandpipers during the breeding season; two pairs. Any smaller, there would be none.

Upland Sandpiper is listed as Endangered in Massachusetts (see: https://www.mass.gov/doc/upland-sandpiper/download)

Vesper Sparrow and Grasshopper Sparrow are both listed as Threatened in MA and their overall populations are declining nationally.

The impact study states some of these large habitat areas, which are different for each species, will be eliminated in some cases and broken up in others.

We are particularly concerned about the proposed mitigation of these areas. The proposal shows areas which are congruent, but not contiguous. The three aforementioned species require contiguous habitat and this plan will likely result in a net taking of these species which is not acceptable.

Of the four options presented the only one which we support would be the first option which is not to expand at all. Reality this expansion is only useful to a handful of individuals who may or may not have interests locally. The current usage and carrying capacity of the airport supports the population of the Plymouth/Carver area and Plymouth County as well.

Glenn d'Entremont

Recording Secretary, Brookline Bird Club

Member of conservation committee

Leader of bird walks for this club and others annual held at the Plymouth airport property

Community Land & Water Coalition
www.communitylandandwater.org

Jones River Watershed Association
www.jonesriver.org

Save Massachusetts Forests

Carver Concerned Citizens

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

December 9, 2024

RE: **EEA 16692: Comments on**
Final Environmental Impact Report/Environmental Impact Study:
Plymouth Municipal Airport Runway 6 Expansion Project & 5 Year CIP Improvements

Dear Secretary Tepper,

Thank you for the opportunity to comment on the above-referenced Final Environmental Impact Report ("FEIR").

These comments are submitted by Community Land and Water Coalition (CLWC), Jones River Watershed Association, Carver Concerned Citizens and Save Massachusetts Forests (the "Groups") on behalf of their organizations and members who live, work and recreate in the area surrounding the Plymouth Municipal Airport and will be affected by the Project. CLWC is a project of Save the Pine Barrens, Inc.

The Groups and others commented on the Draft Environmental Impact Report ("DEIR") on January 8, 2024.

The FEIR does not adequately address the issues identified in the Scope outlined in the Secretary's January 18, 2024 Certificate on the DEIR. We request that the Secretary determine pursuant to 301 CMR 11.08(c)(2) that the FEIR is inadequate and require the Proponent to file a supplemental FEIR in accordance with 301 CMR 11.07.

Background

The Airport's current operations have created conditions that cause daily harm to the health and well being of residents due to noise, vibration, air pollution and hours of operation.

The FEIR does not address the public concerns raised in comments on the DEIR about the current Airport operations and the ongoing daily harm to residents from noise, vibration, air pollution and hours of operation of non-essential aircraft.

The Plymouth Airport is a municipal airport established under Mass. Gen. Laws c. 90, § 51D. It is operated by a 7-member Airport Commissioners appointed by the Town's Selectboard. As a municipal airport it is authorized to make rules and regulations for the airport's operation subject to approval by the state aeronautics board yet the Commissioners allow the Airport to operate causing daily harm to residents and the environment.

The General Laws of Massachusetts prohibit aircraft from flying so low that it interferes with residents' use of their homes or that is a manner that is "imminently dangerous" to people in their homes and on their property. The state law, Mass. General Laws, c. 90, § 46 provides:

> *Flight of aircraft over the lands and waters of this commonwealth, within the navigable airspace as defined in section thirty-five, shall be lawful unless at such a low altitude as to interfere with the then existing use to which the land or water or space over the land or water is put by the owner or occupant, or unless so conducted as to be imminently dangerous to persons or property lawfully on the land or water beneath.*

Yet, residents are documenting the regular, ongoing harm they suffer from the Airport's operations. This includes incessant "circling" by flight schools over their homes, including flights that are imminently dangerous to people and property and cause ear splitting noise and homes to shake and windows to rattle. Examples of excessive circling aircraft are shown below of flight school planes "buzzing" residents in their homes. These are taken by flight trackers on Apps. Despite calls and complaints to the Airport under its "voluntary noise abatement" policy, the intolerable conditions continue harming both elderly residents in the over 55 mobile home parks around the Airport and the very young children who reside directly under the jets, planes and helicopters flight paths.

Exhibit 1: Screenshots from Apps of planes buzzing overhead at the Plymouth Municipal Airport, 2024. More details on request.


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PYM
Plymouth Muni
Plymouth, MA
LOCAL TIME
4:00 PM EST
46°F
Light winds, Overcast skies
No major airport delays
5MA4
07MA
PYM
Municipal
Airport (PYM)
Carver
FlightAware
Maps
Legal
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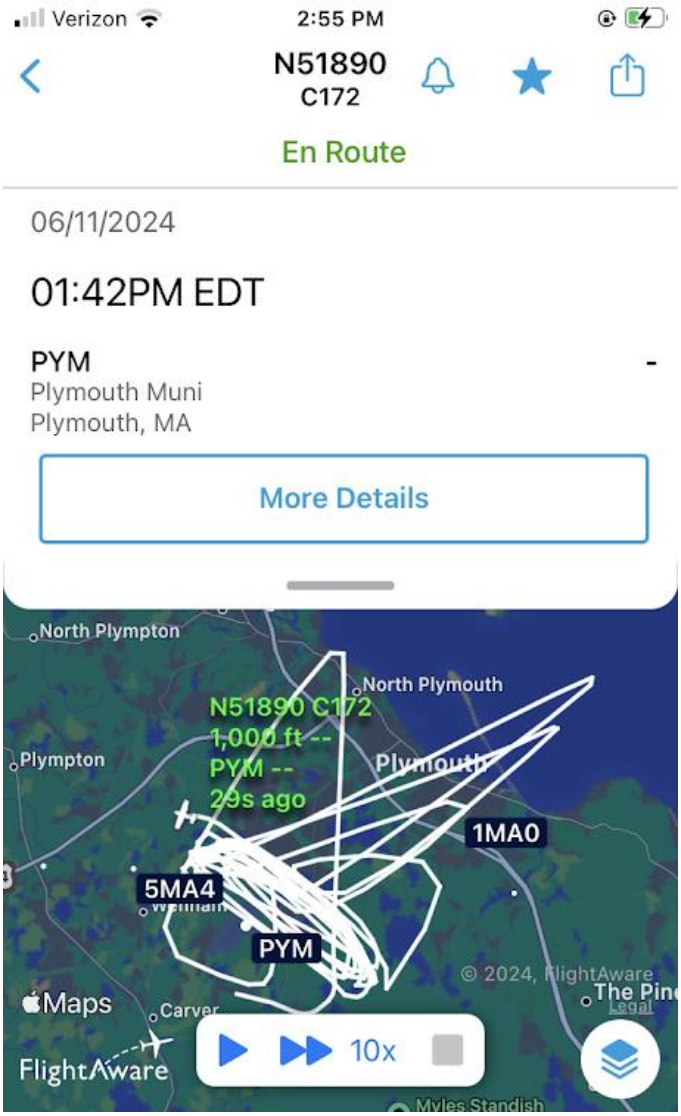


<u>The Airport's noise levels violate the FAA standards identified in the DEIR.</u>

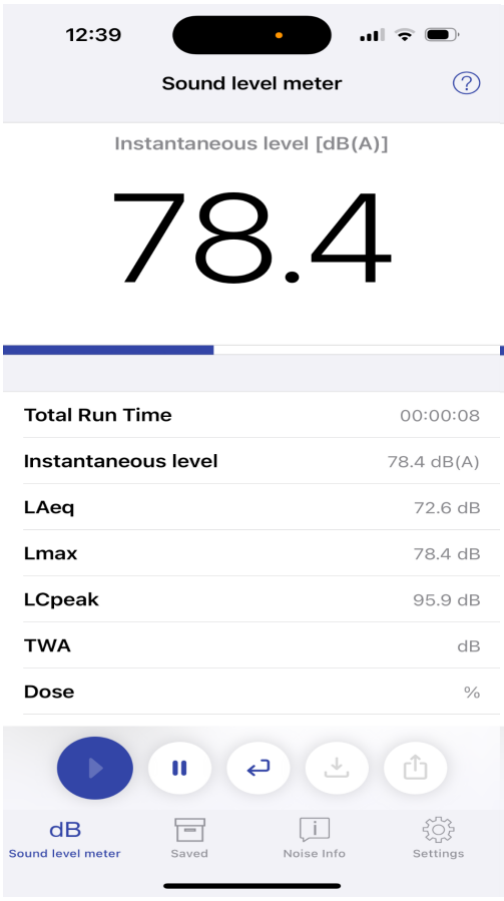
The Airport's noise levels currently violate FAA standards identified in the DEIR. This is also being tracked by residents using Apps. The January 2024 Certificate states,

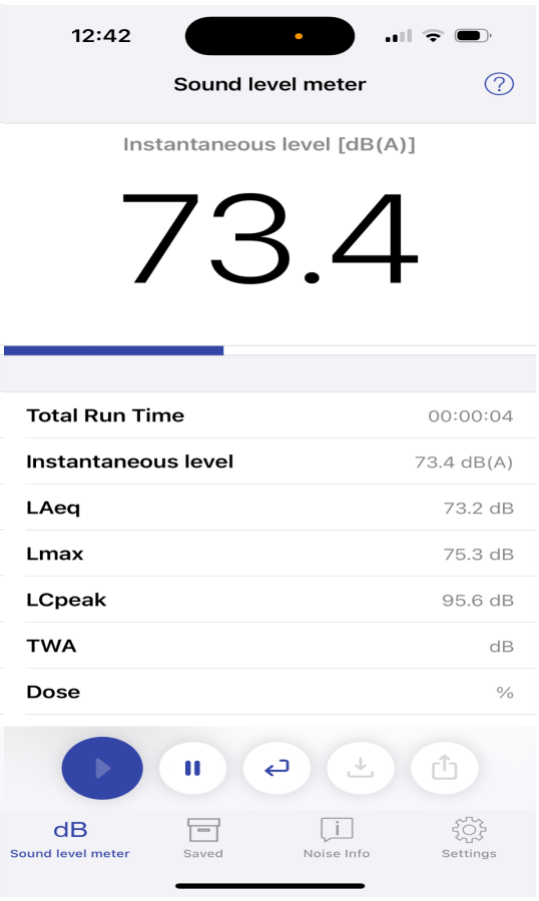
> <u>*Noise*</u> in accordance with the Scope, the DEIR includes an assessment of noise levels associated with existing airport operations, as well as potential changes as a result of the Project. The DEIR states that the FAA has determined that the cumulative noise exposure of individuals to noise resulting 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).

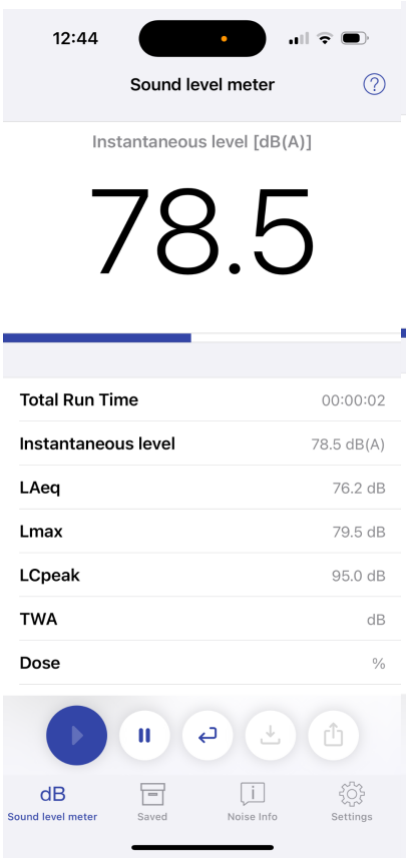
> Noise modeling using the FAA-approved Aviation Environmental Design Tool (AEDT) system was completed using 2021 data (baseline data used for the TMPU), where the Airport experienced an annual total of 61,021 operations, of which 4,271 were jets. Because the Project proposes an extension of Runway 6, 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).** (Emphasis supplied)

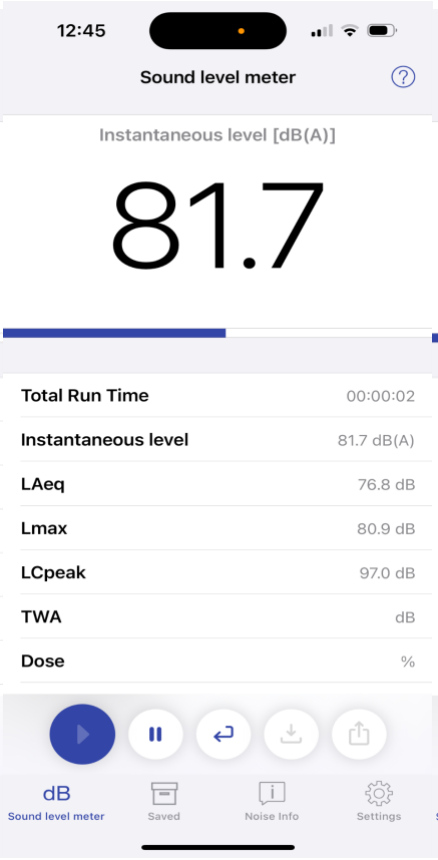
The Airport's operations regularly expose residents to decibels above 70. Below are a series of screenshots of decibel measurements ranging from71 to 81.7, taken by a resident at their home near the Airport. This is a regular and routine occurrence. This appears to be a "significant impact under FAA regulations (FAA Order 10.50.1F)" as stated in the DEIR. Clearly, the Airport should not expand to accommodate more private jets like the Falcon 2000 until it comes into compliance with FAA standards.

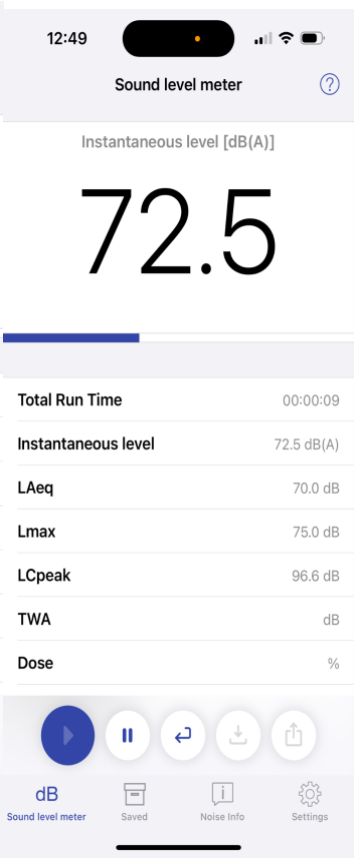
Exhibit 2: Decibel readings at a home in Plymouth MA near the Plymouth Municipal Airport, 2024. More details on request.

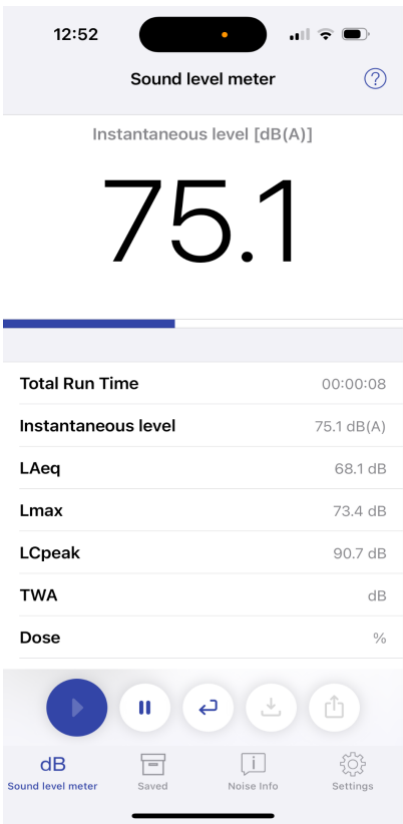

12:39
Sound level meter
Instantaneous level [dB(A)]
78.4
Total Run Time 00:00:08
Instantaneous level 78.4 dB(A)
LAeq 72.6 dB
Lmax 78.4 dB
LCpeak 95.9 dB
TWA dB
Dose %
dB
Sound level meter
Saved
Noise Info
Settings

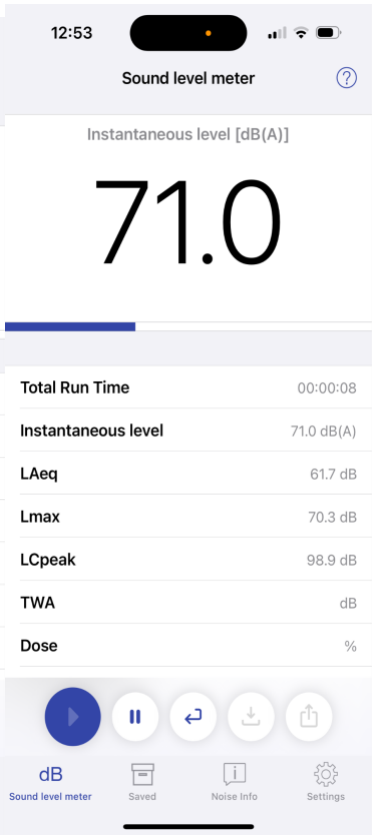

12:42
Sound level meter
Instantaneous level [dB(A)]
73.4
Total Run Time 00:00:04
Instantaneous level 73.4 dB(A)
LAeq 73.2 dB
Lmax 75.3 dB
LCpeak 95.6 dB
TWA dB
Dose %
dB
Sound level meter
Saved
Noise Info
Settings


12:44
Sound level meter
Instantaneous level [dB(A)]
78.5
Total Run Time 00:00:02
Instantaneous level 78.5 dB(A)
LAeq 76.2 dB
Lmax 79.5 dB
LCpeak 95.0 dB
TWA dB
Dose %
dB
Sound level meter
Saved
Noise Info
Settings


12:45
Sound level meter
Instantaneous level [dB(A)]
81.7
Total Run Time 00:00:02
Instantaneous level 81.7 dB(A)
LAeq 76.8 dB
Lmax 80.9 dB
LCpeak 97.0 dB
TWA dB
Dose %
dB
Sound level meter
Saved
Noise Info
Settings


12:49
Sound level meter
Instantaneous level [dB(A)]
72.5
Total Run Time 00:00:09
Instantaneous level 72.5 dB(A)
LAeq 70.0 dB
Lmax 75.0 dB
LCpeak 96.6 dB
TWA dB
Dose %
dB
Sound level meter
Saved
Noise Info
Settings


12:52
Sound level meter
Instantaneous level [dB(A)]
75.1
Total Run Time 00:00:08
Instantaneous level 75.1 dB(A)
LAeq 68.1 dB
Lmax 73.4 dB
LCpeak 90.7 dB
TWA dB
Dose %
dB
Sound level meter
Saved
Noise Info
Settings


12:53
Sound level meter
Instantaneous level [dB(A)]
71.0
Total Run Time 00:00:08
Instantaneous level 71.0 dB(A)
LAeq 61.7 dB
Lmax 70.3 dB
LCpeak 98.9 dB
TWA dB
Dose %
dB
Sound level meter
Saved
Noise Info
Settings

Noise is a health hazard. See, e.g., Noise and Health, Noise pollution is more than a nuisance. It's a health risk. Harvard Magazine, Spring 2022.

The Airport is required to comply with FAA rules and regulations because it has accepted federal funding through the Airport Improvement Program (AIP). While this is in effect a contractual obligation between the Town of Plymouth as the owner of the Airport and the United States government, the FAA does not preempt the Town's obligation to the safety and well-being of its residents. It does not give the Airport the right to operate or expand the Airport in a manner that harms residents.

Comments on FEIR Section 1.0 Project Description

It bears repeating that the Airport is a municipal airport that should put its residents first before the private commercial interests of private jet companies and their private customers. While the Airport serves public services like Boston MedFlight Helicopters and provides emergency helicopter services these only average between four and six flights per day according to the FEIR. The Airport is also the headquarters of the Massachusetts State Police Air Wing that has three helicopters and one airplane that serves air search, air rescue, and anti-terrorism activities. These limited functions are not the problem: it is the expansion of private commercial aircraft use and private jets that causes most of the damage to the environment at issue. Further, the Airport acts as a parking lot for private jets from Nantucket, Martha's Vineyard and Cape Cod when those airports are full to capacity during peak summer vacation times. This is unacceptable.

The FEIR does not justify the Purpose and Need for the Airport Expansion. Section 1.2 states,

> The Airport is not seeking to increase airfield capacity nor expand the Airport but rather, meet airfield geometry standards, recommendations for runway length, and address current FAA safety and design criteria standards for the current family of aircraft operating at the Airport. As aircraft, technology, FAA safety and design criteria change, so must the Airport.

This is an assumption that does not stand up to scrutiny. The Airport can change, but it does not need to expand to accommodate private jet traffic. The entire premise of the FEIR and expansion plan is that the Airport needs to expand to accommodate private companies who serve private air travelers. It does not. Moreover, while the FEIR and the Airport Technical Master Plan Update (TMPU) state that expansion is to be implementing projects to improve "runway safety" for the private jets, neither the DEIR or FEIR give any calculations or specific figures for the additional

“safety margin” that would be provided by extending the runway. What is the actual “safety margin” that will be achieved, even if it is only to accommodate private jets?

The Airport has designated the Falcon 2000 as its “critical aircraft” meaning for the FEIR as it is the "most demanding aircraft having regular use of the airport." As a B-II category aircraft, the Falcon 2000 has certain runway length requirements for the Falcon 2000 to take off with its maximum certified takeoff weight. This is because a longer runway is required for an aircraft to reach a safe takeoff speed when it is carrying a heavier load. The Falcon 2000 can still operate at Plymouth, but **t**o operate at its "full capacity" in terms of the amount of fuel and/or passengers it can carry it needs the runway expansion. But this comes at the expense of the residents.

Figures in the FEIR are inconsistent

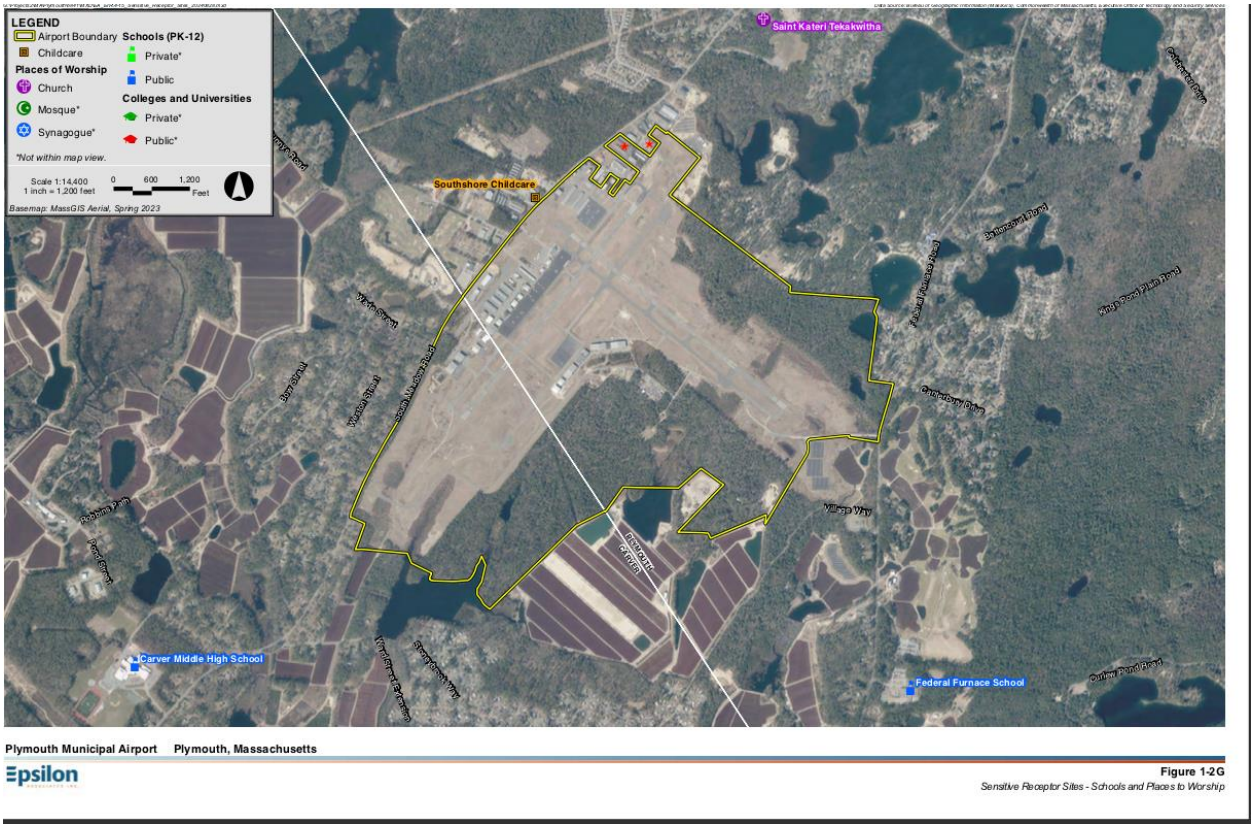
The Figures in the FEIR Section 1 have the following inconsistencies/inaccuracies:

Figure 1-2A: What is the encroachment on the Plymouth Airport CR in the Northeast part of the Airport? This appears to be land clearing and deforestation.

Was the land use alteration to the west in and around wetlands covered by an Order of Conditions?

Figure 1-2B: Map of Priority Habitat - the entire airport is still a priority habitat? When was the latest survey? How can species possibly survive on an airport runway?

Figure 1-2G: Does not show the second day care; it only shows Southshore Childcare as shown below. Thus, the FEIR does not address the location of the additional daycare in the area, immediately adjacent to the Airport and shows an inaccurate location of the daycare. See Figure 1-2 G from the FEIR below that does not include the second daycare and has the wrong location of South Shore Daycare which does not appear to exist.



The red stars to the top of the page show the location of the following two daycares/preschools.

1. **South Shore Early Education –**
   196 South Meadow Road,
   Plymouth, MA 02360

2. **Ms. Joanne's Bright Beginnings**
   200R South Meadow Rd
   Plymouth, MA, 02360

One of them is on the actual Airport property.

<u>Inaccurate information about economics</u>

The Project description states that "the Airport is home to 21 private businesses, employing more than 175 people. These businesses provide services such as flight instruction, aircraft maintenance, aircraft sales, and corporate flights." There is no documentation to support this claim and it seems implausible. In contrast, the Master Plan states the airport directly employs nine people**.** These positions include an airport manager, an assistant manager, an office

manager, and six airport operations/maintenance personnel. It states approximately 250 people are employed by the many businesses operating at the airport, a difference of about 75 people. The SEIR should address this with an accurate economic analysis of the justification for the Airport.

Failure to account for "touch and go" operations

The FEIR appears to exclude "touch and go" operations in its calculations. It states,

> The Falcon 2000 is the critical aircraft, which it defines as "the most demanding aircraft type, or grouping of aircraft [families of aircraft] with similar characteristics, that make regular use of the airport. Regular use is 500 annual operations, including both itinerant and local operations but excluding touch-and-go operations.

The FEIR does not describe what a "touch and go operation" is, but it appears this is the most problematic type of operation at the airport. Generally a touch and go is a flight maneuver where a pilot lands an aircraft on a runway, but immediately takes off again without coming to a complete stop, essentially performing a landing and takeoff sequence in one continuous motion. This is a common training exercise for pilots to practice landing and takeoff techniques repeatedly without needing to taxi off the runway between each landing.

The FEIR should include ALL touch and go operations in the calculations. Figure 1 above shows the flight schools that circle endlessly. Combined with touch and goes this is the most problematic aspect of the operations.

Comments on FEIR Section 2.0 Alternatives Analysis

The FEIR conducted alternatives analyses for three components: Runway 6 extension and resulting Taxiways A and E extensions, the wastewater line installation, and the proposed new hangars.

2.1 Runway Extension

The FEIR identifies Alternative 2, the 351 foot extension as the preferred alternative. The Secretary should reject this alternative. First, accommodating private jet traffic (the Falcon 2000 or similar) is not the community's preferred use of the airport or alternative. It was chosen by the Airport commissioners, appointed by the Selectboard. Hundreds of people have signed petitions and comment letters opposing Alternative 2, the runway expansion. Second, the Commissioner's primary justification for Alternative 2 is "safety margin" for the Falcon 2000. As noted above, the FEIR is completely devoid of any details on what constitutes this "safety margin". The Airport current operations are "safe" according to any number of sources. The FEIR does not

provide any accident records or identify incidents that threatened people or property or presented a risk from operations Therefore there is no justification for the runway expansion – other than to accommodate private jets. The FEIR does not justify adding more noise, vibration, air pollution and other impacts from the expansion for private jets.

Section 2.1.2

The FEIR rejects Alternative 1, the No Build Alternative for the runway state it does not fulfill the minimum runway length required for the critical aircraft as analyzed in the Technical MPU. In other words, the FEIR choses Alternative 2 to accommodate the "critical aircraft" which is the private jet of the Falcon 2000 type. For the reasons stated in these comments and those of other members of the public, Alternative 1 is the only alternative that meets MEPA criteria.

The Federal Aviation Administration does not require a specific minimum runway length but rather relies on design standards based on the "critical aircraft" that will be used. The airport commission has stated repeatedly that they do not expect an increase in aircrafts or in size of aircrafts. Yet, runway extensions are often a way to accommodate larger aircrafts and to allow larger, heavier planes to operate at the location.

Table 2-1 States,

> The 351' extension was presented as the Preferred Alternative in the TMPU based on all factors that include public engagement and environmental concerns. This EA/EIR presents the 351' as the "Proposed Action" for RW 6 Approach based on ultimate Airport Commission determination that resulted from those same factors with additional cost, stakeholder outreach, and future growth considerations; total lengths given for TW A and E include total length of asphalt to include the extension to meet RW 6 extension length + stub/turn.

Since the 2022 TMPU and wider understanding by the public of what the Airport is actually proposing and why, this is no longer a valid justification for choosing Alternative 2. The public opposes the 351-foot extension.

2.2 Wastewater Analysis

The wastewater expansion is clearly stated to be for future airport expansion. The FEIR notes that these projects are in the conceptual phase and that their exact locations and sizes are approximated and lack adequate information. The sole reason given is expansion of the Airport as the FEIR states, "the need for a gravity sewer main is critical to provide sewer service for additional development."

Section 2.3 New Hanger Alternatives

The FEIR rejects the "no build" alternative for hangers because "This would not meet the demand for new hangars identified by the Airport."

Additionally, this alternatives analysis is also biased toward Airport growth, which is not the public's preferred option. The analysis takes into consideration the evolution of aircraft and that future hangar development and longer wingspans, a feature of modern single-and multiengine- aircraft that means expansion of the Airport.

The FEIR recommends two new hangers. See, Alternative 3. Expanded hangar space is clearly only being pursued for the airport to expand. This expansion is likely to increase air traffic, which in turn contributes to environmental damage, including noise and carbon emissions. As noted, 'Runway expansion often leads to increased air traffic, which directly contributes to carbon emissions' (Summers, Michael. "Runway Construction and Expansion.", 29 Nov. 2024, mapilots.org/runway-construction-and-expansion")

The FEIR acknowledges the projected long-term increase in airport operations but maintains that the Runway 6 extension itself is not expected to cause a substantial surge in operations. This does not directly address concerns about the impact of new hangars on attracting more jet traffic. See, page 22 of the FEIR.

The FEIR also states that "The Proposed Actions are anticipated to have little effect on air traffic volume over the next 5-7 years." (page 139 FEIR) However, by providing more hangar space and making it more cost effective for Falcon 2000s type jets to come to the airport because they can go further and carry more customers, it is likely that the Airport will expand operations. The FEIR gives conflicting information and statements about expansion v. non expansion. This should be clarified.

Section 3 Groundwater

This section of the FEIR suffers from many fundamental defects. Despite citing the importance of the 1990 federally designated Plymouth-Carver Sole Source Aquifer, the FEIR gives no updated information about it or a plan to provide baseline data, monitoring or a serious protection other than complying with stormwater standards.

Section 3.1.2 Construction Period Groundwater Protection Measures

It is not possible to determine if the spill containment plan is adequate without knowing the expected fill needs or the potential hazards in the event of a spill. An on-site, empty 5-gallon bucket seems insufficient for a spill of any significant size, especially if absorbent pads are used. Larger spills, such as those occurring while filling tanks or heavy equipment, may require more

capacity, possibly even vacuum equipment. The designated area 'outside ecologically sensitive' areas should be mapped and approved by appropriate town and emergency response personnel. Additionally, a site map should clearly label all designated refueling aprons, fuel storage areas, and the locations of spill kits and equipment.

Monitoring Plan

The Certificate states:

> 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.

The FEIR does not provide a monitoring plan for soil and groundwater as required by the FEIR. The FEIR obfuscates and refers to past monitoring and monitoring obligations for regulatory requirements such as the WWTP, but never responds directly to the Certificate. Clearly, the answer is "NO" the Airport is not including a groundwater and soil monitoring plan.

The FEIR Ignores EPA's Recommendations For Monitoring The Groundwater

The FEIR admits that the airport does not currently have an active, existing **groundwater monitoring plan.** The FEIR states:

> The Airport has conducted groundwater monitoring periodically for prior projects but does not maintain any actively sampled wells at this time. The most recent monitoring conducted in 2012 was groundwater monitoring associated with the wastewater treatment plant at the Airport which included testing levels of VOCs in the water. The Town of Plymouth, Sewer Division determined that there were no violations to the accompanying Groundwater Discharge Permit.

The FEIR cites monitoring conducted in 2012 for wastewater treatment plant at the Airport which included testing levels of VOCs in the water. In Table 3-4 the Airport attempts to pass off this 32-year old water analytical data as somehow relevant to the FEIR in 2024. The FEIR provides no information about the **current** status of the Groundwater Discharge Permit for the Airport wastewater treatment plant or any current sampling by the Plymouth Sewer Division. The relevant permit appears to be W018813 which does not appear to be updated on EEA's Data Portal. The attempt to use 32-year-old data is actually quite surprising for a municipal facility such as the Airport.

Public comments asked the Airport to identify the number of private wells in the area and their location. The FEIR fails to do this. The consultants do not appear to understand that all residents

of Carver have private wells except for those served by the North Carver Water District. That means all the residents near the airport have private wells or public water supplies at their planned communities. Carver does not have a municipal water supply around the Airport. In addition, the North Carver Water District has been shut down due to neglect and poor management by the Town of Carver. The homes with contaminated wells in North Carver that should be utilizing the water at the North Carver Water District are now receiving water from Middleboro that is known to contain contaminants such as PFAS.

Per federal and state guidelines, there currently exist no drinking water testing or monitoring programs for the private wells at individual homes in Plymouth and Carver unless a private homeowner pays for private testing. At that time, if the private well is contaminated the DEP will look to identify the source of the contamination and will facilitate mitigation under Chapter 21E. The FEIR shows that the Project area includes Environmental Justice neighborhoods based on income. The cost of private water testing is out of reach for many residents. Therefore, they could be exposed to contaminated water without knowing it.

As far as PFAS contamination, the FEIR is blatantly misleading. On June 24, 2024 the EPA filed the final enforceable maximum contaminant limits for 6 PFAS to ensure public health and safety. They are:

Compound	Final MCLG	Final MCL (enforceable levels)[1]
PFOA	Zero	4.0 parts per trillion (ppt) (also expressed as ng/L)
PFOS	Zero	4.0 ppt
PFHxS	10 ppt	10 ppt
PFNA	10 ppt	10 ppt
HFPO-DA (commonly known as GenX Chemicals)	10 ppt	10 ppt
Mixtures containing two or more of PFHxS, PFNA, HFPO-DA, and PFBS	1 (unitless) Hazard Index	1 (unitless) Hazard Index

In 2021, MassDEP required testing for PFAS in all their Public Water Systems; these Public Water Systems have ample time (until June 2029) to comply with the new regulations to implement mitigation practices to protect drinking water. Additionally, Massachusetts is currently working towards setting their new maximum contaminant levels from 20 ppt to ones that are “no less stringent” than those of the EPA.

The FEIR uses 2021 well testing data but cherry picks only the municipal wells to claim that “all wells in Plymouth were tested a total of four times and no PFAS was detected for almost all of the wells.” This appears to mean that the municipal wells were tested. The actual 2021 data is attached as Exhibit 2 and shows the many wells in Plymouth required to be tested under the SDWA and those showing contamination with PFAS.

The statement within the FEIR that “No history of use of PFAS” does not reflect a comprehensive investigation into the potential presence of PFAS on the site. PFAS has been a hidden contaminant for many years, with over ten thousand formulations used and distributed. This issue was highlighted in recent years, such as in the case of challenges to aerial and widespread pesticide applications for mosquito control. In 2019, planes departing from Plymouth Airport sprayed Anvil 10+10, which was contaminated with PFAS. The PFAS was introduced into the pesticide from 55-gallon fluoridated barrels, leading to widespread contamination across millions of acres in Massachusetts. In October 2020, the MA DEP established PFAS thresholds for drinking water wells and mandated treatment for numerous public wells contaminated by these substances. However, the applicant has not conducted an investigation for PFAS contamination on site, instead simply stating that the facility has not intentionally used this contaminant. Additionally, the applicant references the town's water quality report for municipal wells, which is not sufficient to safeguard the extensive natural resources surrounding the site.

The more recent municipal well testing for Plymouth shows PFAS present in 3 wells, not just the Wannos Well as the FEIR mistakenly states.

Exhibit 3 below: Source: Town of Plymouth, accessed 12/7/2024. https://www.plymouth-ma.gov/1317/PFAS

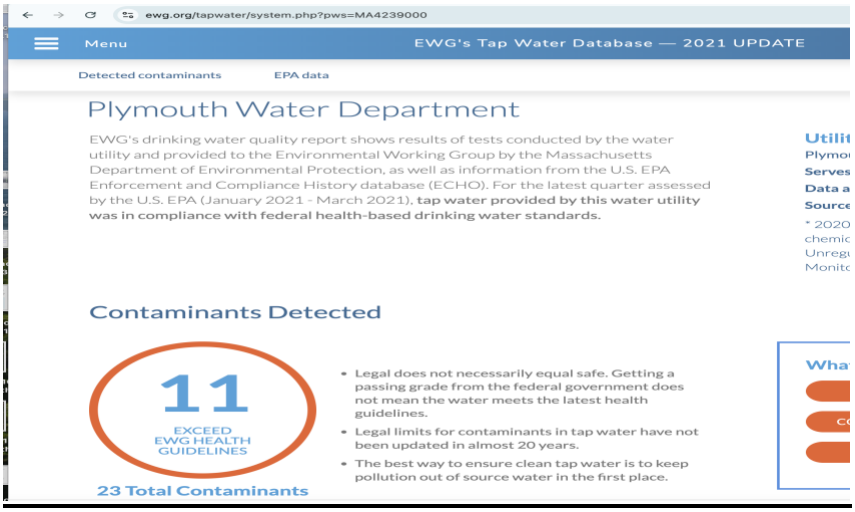
Compound	Current MassDEP Standard	EPA Standard	Wannos Pond Well	North Plymouth Well	Lout Pond Well	PWS Meets Standard?
PFOA	Combined 20 ppt	4 ppt	**2 ppt**	**1.7 ppt**	**1.2 ppt**	**Yes**
PFOS	Combined 20 ppt	4 ppt	**1.3 ppt**	**1.6 ppt**	**Non Detect**	**Yes**
PFNA	Combined 20 ppt	10 ppt / Hazard Index (HI) ≤ 1	**Non Detect HI = 0.0007**	**Non Detect HI = 0.0014**	**Non Detect**	**Yes**
PFHxS	Combined 20 ppt	10 ppt / Hazard Index (HI) ≤ 1	**Non Detect HI = 0.0007**	**Non Detect HI = 0.0014**	**Non Detect**	**Yes**
PFHpA	Combined 20 ppt	No EPA Standard	**Non Detect**	**Non Detect**	**Non Detect**	**Yes**
PFDA	Combined 20 ppt	No EPA Standard	**Non Detect**	**Non Detect**	**Non Detect**	**Yes**
PFBS	No MA Standard	Hazard Index (HI) ≤ 1	**HI = 0.0007**	**HI = 0.0014**	**Non Detect**	**Yes**
HFPO-DA (GenX Chemicals)	No MA Standard	10 ppt / Hazard Index (HI) ≤ 1	**Non Detect HI = 0.0007**	**Non Detect HI = 0.0014**	**Non Detect**	**Yes**

While the 2023 results comply with current standards as the Town website acknowledges, EPA is setting stricter standards as stated aboveand the state has 2 years to come into compliance and lower the MCLs to “not less stringent” than the EPA’s.

The point is that the Airport has used outdated and misleading data by failing to provide sampling results from all of the municipal and public water supply wells in Carver and Plymouth to show the current baseline of water quality. It has completely disregarded the private drinking water wells and any risk to those from Airport expansion.

EPA’s drinking water standards have not been updated in almost 20 years so the FEIR results do not mean the water is safe. A simple search of the Environmental Working Group Tap Water Database shows that Plymouth Water Department water exceeds health guidelines for 11 out of 23 contaminants.

Exhibit 5: Tap Water Database https://www.ewg.org/tapwater/system.php?pws=MA4239000



The FEIR does not outline a specific monitoring or mitigation plan for PFAS or other contaminates such as 1,4 Dioxane that are historically found at airports, that require targeted management. The EPA has taken stringent measures to ensure that airports and military facilities where aircraft are housed and training regularly occurs, such as Otis Air Force base on Cape Cod, which sits a federally designated sole source aquifer, as well, take the necessary steps required to test for and remediate any contamination whose plume may be leaching into the groundwater. For example, in 2014, the Air Force, based on recommendations from the Five

Year Review Report began investigations for emerging contaminants PFOA and PFOS and 1,4 Dixoane. PFAS are ingredients in aqueous film forming foams such as fire-fighting foam (but is not limited to fire-fighting foam). 1,4-dioxane is a stabilizer in fuel. The Town of Carver has been dealing with a 1,4-dioxane plume in North Carver since approximately 2013. Not surprisingly, both contaminants were found at Otis. In response to these long-reaching plumes, the Air Force has taken remedial actions to eliminate residential exposures to PFAS and 1,4 dioxane by providing bottled water where private well samples were found to have concentrations which exceed State and Federal MCL limits (which limits were higher than they are now).

At the very least, the Plymouth Airport Commissioners should use the clean-up at Otis Airport Force Base and their investigative and remedial activities as a guide. There should be a robust monitoring program, including regular PFAS and 1,4 Dioxane testing of groundwater and potential source areas, as is required to assess the effectiveness of the airport's mitigation efforts and detect any emerging PFAS and 1,4-dioxane contamination. Such testing should include the private wells within the vicinity of the Plymouth Airport.

Overall, the FEIR acknowledges the potential risks associated with PFAS and emphasizes the importance of protecting the Plymouth-Carver Sole Source Aquifer. However, a more proactive and targeted approach to PFAS monitoring and mitigation would enhance the airport's commitment to safeguarding this critical water resource.

Hydrological data and groundwater flow and elevations

The FEIR lacks essential hydrogeological data and a comprehensive groundwater flow map. FEIR is rather misleading in that it states, "This section details information about groundwater depth, contours, and flow directions to better describe the context, existing location, and subsurface environment for areas potentially affected by the project." However, again it does not actually give accurate or current data. The FEIR refers to and relies on another 32 year old report, the 1992 IEP groundwater study and a 23-year old 2001 study for groundwater soil testing and groundwater contours and flow. The Certificate and the EPA's comment letter emphasize that understanding groundwater flow patterns is crucial for assessing potential risks to drinking water.

The FEIR indicates that groundwater generally flows south and west in the vicinity of the airport. However, localized variations in groundwater flow can occur, influenced by factors such as topography, soil composition, and pumping activities.

The Proponent indicates that it is primarily concerned with water flowing south, west, and east of the airport relative to potential impacts on the Plymouth-Carver Sole Source Aquifer. However, this is an airport. Not only is the applicant intending to expand its runway, add hangars, and increase operations, but it is also anticipating a rise in air traffic. Planes taking off and landing at the airport travel from all directions and emit by-products from burning fuel, and may even dump fuel in certain emergency situations. It is insufficient to consider air quality emissions based solely on data from a monitoring station in Boston. Each geographical area has unique characteristics. Plymouth, for example, has different air quality and weather patterns compared

to Boston, and each entity must take responsibility for minimizing climate impacts. Plymouth Airport has more takeoffs and landings than reported, primarily due to its flight school, and it is likely that there are greater emission impacts in the local area.

Pollution entering any part of the aquifer could have shared impacts, whether from direct contamination or changes in land use or management practices. Exhaust from fuel-burning takeoffs, landings, and flights overhead certainly impacts the larger aquifer, much like salt dispersed on local roadways affects groundwater quality, either from direct contamination or through stormwater systems infiltrating the ground. While the October FEIR submission cites the number of planned trips, it does not account for practice flights, particularly takeoffs and landings, which are especially fuel-intensive and contribute to significant rubber buildup on the tarmac.

This complexity highlights the need for site-specific assessments to accurately determine the potential migration pathways of contaminants and their potential to reach drinking water wells.

The FEIR states it "has been updated to include preliminary results from a conceptual stormwater analysis to determine the measures that will be employed to protect the water quality of the sole source aquifer." This is insufficient because the actual stormwater management systems should be designed not conceptual in order to assess discharges.

The FEIR lacks a complete list of potential contaminants expected to enter the groundwater, including those from aviation fuel, construction materials, and past contamination incidents. Establishing baseline contaminant data, particularly for volatile organic compounds (VOCs), metals, and polyaromatic hydrocarbons.

The FEIR states that a stormwater pollution prevention plan will be created for expansion, and lists what it will include, but does not present a fully developed SWPP that can be reviewed or evaluated to date. A SWPP is crucial to get right on this project since the Airport stores, handles, and uses fuels, oils and other potentially hazardous materials. The FEIR does not confirm whether the airport's SPCC plan has been updated to reflect the proposed construction and operations, as recommended by the EPA.

This is significant because the Airport was the source of unlawfully shipped hazardous waste in 2024. A defense contractor that was a tenant at the Airport was penalized $10,000. Press Release, MassDEP, *Massachusetts and Rhode Island Environmental Agencies Join to Investigate and Penalize Company for Hazardous Waste Violations,* 3/14/2024.This raises serious questions about the Airport's oversight and management of the tenants in its hangers and buildings.

The FEIR notes that a detailed Stormwater Report has not been provided. While the FEIR acknowledges the EPA's suggestion to use advanced stormwater BMPs and monitoring wells the FEIR fails to show the BMPs (or any LID systems it commits to) or how they will be implemented.

The SEIR should provide a robust monitoring program for public and private drinking water wells in the vicinity of the airport. There should be funding for this program and mandates for remediation.

Section 4 Environmental Justice/ Public Health

The FEIR lists mitigation strategies for construction-related traffic, noise, and air quality impacts but does not give a clear plan of how these impacts will be monitored. The strategies also lack information on what impacts there will be to water sources during construction.

The FEIR does not sufficiently consider the project's impacts on Environmental Justice (EJ) populations and public health. Similar critiques were raised in the Hanscom Airport DEIR, where a limited study area and reliance on broad data sources failed to capture the true scope of impacts.

The Plymouth FEIR overlooks the cumulative burdens of emissions, noise, and pollutants on vulnerable communities and fails to assess how these compounded effects might exacerbate existing health disparities. There is a lack of localized air quality monitoring data and consideration of ultrafine particles (UFPs), which are emitted by aircraft and have been identified as significant health hazards.

The FEIR does not provide soil testing for lead and PFAs at West Recreation field and local daycares and schools as requested in comments on the DEIR.

Section 5 Wetlands, Stormwater, Wastewater, and Climate Resiliency

The FEIR acknowledges the need for stormwater management but lacks specifics on:

- Detailed BMPs.
- Implementation timeline.
- Criteria for LID feasibility.
- Monitoring well installation.

To fully evaluate this project the FEIR would have needed to include a detailed Stormwater Report that was asked to be done during the DEIR process. The FEIR has failed to provide that report and defers the report to a future date.

The FEIR relies on a conceptual stormwater analysis to protect water quality and the aquifer as noted. With only a conceptual analysis the FEIR fails to fully evaluate the effectiveness of such a plan or address all concerns established by the public. FEIR p.75.

Leaching basins proposed further risk of groundwater contamination. FEIR p. 76. Basins need to be properly managed to avoid contamination risks, the FEIR does not clearly lay out a plan to

monitor these basins or potential impacts they could have to the groundwater that they will flow into.

An erosion and sediment control program has not yet been described and will be put off to a future design phase.

As with other projects, such as Hanscom Airport DEIR, deferring stormwater and erosion management strategies to later phases creates uncertainty about compliance with Massachusetts standards. Proposed measures are conceptual at best and lack the specificity needed to ensure the protection of water resources, including wetlands and the aquifer.

Section 6 Rare Species

The Airport identified areas for stormwater management are located within existing grassland areas. Proposed stormwater management measures include subsurface systems within hangar footprints (such as under-pavement infiltration chambers), infiltration basins, grass channels, and filter strips. The GHMP is considered data-sensitive and not a public document, which limits the available details about how the plan is implemented. These are problematic aspects of the FEIR.

Conservation Management Permits (CMPs)

The FEIR should outline the Grassland Habitat Management Plan (GHMP) effectiveness, include baseline species data, and provide a plan for long-term net benefits to state-listed species. The FEIR states that "The Airport intends to file for a CMP or CMP amendment after the current planning phase of the Projects."

The DEIR states that "the Airport maintains land in a 'mitigation bank'…to meet the performance standards for a CMP."

Although there is mention of CMP intentions, the FEIR lacks:

- Specifics on long-term benefits for state-listed species.
- An assessment of GHMP's effectiveness.
- Baseline species data.
- Lack of Transparency and Enforcement: The FEIR does not provide specific details regarding the location of CMP-covered parcels, public access to these permits, or the enforcement mechanisms in place. It also does not address concerns about the lack of public input during the initial granting of CMPs to the airport.

The FEIR focuses on limiting mowing frequency to limit disruption of these species but does not evaluate impacts from potential contamination sources, runoff, impacts to soil or air quality, or habitat loss that may impact these species.

The FEIR also states that “The Runway 6 extension, taxiway extension, and hangar project, as proposed, will likely result in a Take (321 CMR 10.18 (2)(b)) of state-listed species.” (Pg94 of the FEIR)

The proposed mitigation strategies for habitat disruption are vague and do not include sufficient plans for habitat restoration or long-term monitoring. Moreover, the FEIR does not outline protocols to minimize construction impacts during sensitive periods for these species.

Section 7 Mitigation and Draft Section 61 Findings

The mitigation measures and Draft Section 61 Findings outlined in the FEIR are inadequate and lack enforceability. Restoration plans for disrupted habitats and stormwater upgrades are vague, without clear commitments or timelines.

Mitigation measures must be specific, enforceable, and aligned with essential state and federal environmental standards. Without clear commitments, the risks posed by this expansion remain unaddressed, further exacerbating the potential for long-term harm to Plymouth’s environment and public health.

Section 8 Response to Comments

The FEIR Fails to Provide a Direct Response to Many Public Comments

The FEIR fails to directly address the environmental impacts of sand and gravel mining operations in the vicinity of the Airport. These operations, as highlighted by CLWC pose significant risks to the surrounding environment. In addition, the operations generate significant truck traffic and diesel emissions that are totally unaccounted for by local municipal bodies in the state. There are multiple sand and gravel mines operating around the airport each of which generates thousands of truck trips monthly; one operation Read Custom Soils in Carver generates 500 truck trips daily for sand and gravel operations. This is cumulative air pollution, noise, dust and that is totally unaccounted for by the FEIR’s calculation of air pollution.

The FEIR disregards the alterations of natural water flow and the risk of groundwater contamination associated with sand and gravel mining. The removal of sand and gravel can alter both surface and groundwater flow patterns, potentially leading to contamination of the local aquifer as the mining process disrupts vegetation and soil, which normally help filter contaminants. These issues, particularly the potential degradation of groundwater and topography, are not adequately addressed in the FEIR. This is particularly concerning since the FEIR groundwater data is about 30 years old and does not therefore account for the land use changes by sand and gravel mining, or even rapid growth in the area. Plymouth has had one of the highest growth rates in Massachusetts the last 20 years and this impacts water and the environment — yet the Airport uses 30-year-old data that does not reflect these changes.

The FEIR fails to include a cumulative impact analysis of the combined effects of the airport expansion project alongside the ongoing sand and gravel mining operations in the area and on the Airport property itself. While the airport acknowledges the existence of these mining activities, it maintains that they are beyond their control. It asserts the operations are “regulated.” Documentation shows the majority are not. However, the DEIR and FEIR do not comprehensively assess the potential cumulative impacts of these operations in the broader context of land use changes and development surrounding the airport, thus limiting the understanding of the full environmental consequences. Further, the FEIR suggests that these issues would be more appropriately reviewed and permitted during the local and state permitting processes for those activities. This deferral to local and state permitting implies a fragmented approach, leaving cumulative impacts unaddressed at a broader environmental assessment level.

The FEIR fails to indicate any plans for implementing real-time noise monitoring in residential areas, leaving the question of validating modeled noise levels and addressing residents' lived experiences unanswered. The DEIR claimed the “Airport typically has fewer than 20 noise complaints per year (TMPU, 2022; Chapter 2.1). Issues are handled promptly and brought to resolution. The Airport works to identify the nature of all noise complaints and works diligently to minimize noise impacts whenever possible.” This is inaccurate as personal testimonials establish.

While contour maps in the FEIR indicate decibel areas the measurements shown above in Figure 2 using the NIOSH SLM app show most planes exceeding 70 to 80 dB, with flights occurring every minute or every other minute. The claim on page 142 of the FEIR stating there are "no significant impacts on noise and noise-compatible land use beyond the existing condition" as a result of the proposed action is not accurate.

Neighbors have reported a significant increase in air traffic over the past two years, a concern they feel is being ignored by the airport manager and commission. In August 2024, Matt Cardillo noted that the volume of noise complaints the airport used to receive annually is now being reported on a regular basis.

Conclusion

The FEIR is inadequate and the Groups request that the require a Supplemental EIR.

Very truly yours,

Save the Pine Barrens, Inc./CLWC, Margaret E. Sheehan,
environmentwatchsoutheasternma@gmail.com

Save Massachusetts Forests, Janet Sinclair

Jones River Watershed Association, Pine duBois, Executive Director, pine@jonesriver.org

Carver Concerned Citizens
carverconcernedcitizens@gmail.com

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

Gary Moran
Acting Commissioner

December 9, 2024

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

RE: FEIR Review. EOEEA 16692 Plymouth Carver Plymouth Municipal Airport Runway Extension at 71 Airport Road

Dear Secretary Tepper,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Final Environmental Impact Report (FEIR) for the Plymouth Municipal Airport Runway Extension at 71 Airport Road, Plymouth/Carver, Plymouth Municipal Airport Runway Extension Plymouth Municipal Airport Runway Extension, Massachusetts (EOEEA #16692). The Project Proponent provides the following information for the Project:

The Airport propose to implement a series of Airport projects through Airport's TMPU and the 5-year CIP that the TMPU presented including minimal runway and taxiway extensions, airfield navigational instrument relocation, the addition of two hangars, and the addition of airfield infrastructure (sewer line extension and backup generator), see Figure 1-4A and Figure 1-4B. These projects were identified in the Federal Aviation Administration (FAA)-accepted TMPU, CIP, and Airport Layout Plan (ALP). The TMPU provides a framework to guide future Airport development that will enhance safety, cost-effectively satisfy current and future aviation demand, meet FAA standards for Airport design and geometry for the families of aircraft that use the Airport, while considering potential environmental and socioeconomic impacts. Specifically, the projects proposed include:

- **Extension of Runway 6-24 by 351-feet at Runway 6 end;**
- **Extension of Taxiway A and Taxiway E to align with the new Runway 6-24 length;**
- **Relocation of navigational aids;**
- **Installation of a sewer main extension along a portion of the Gate 6 access road;**
- **Construction of two new hangars;**
- **Reconstruction of Gate 3 taxi lane; and**
- **Reconstruction of Runway**

Bureau of Water Resources (BWR)Comments

Stormwater:

National Pollutant Discharge Elimination System (NPDES) Construction General Stormwater Permit.

The Project Proponent acknowledges that its activities will require filing a Notice of Intent (NOI) with the United States Environmental Protection Agency (US EPA). Access to information regarding the NPDES Stormwater requirements and an application for the Construction General Permit is obtained by completing and submitting a Notice of Intent (NOI) to EPA via the Stormwater Discharges from Construction Activities | National Pollutant Discharge Elimination System (NPDES) | US EPA.

The Proponent is advised to consult with Margarita Chatterton at Chatterton.Margarita@epa.gov or by phone at 601-918-1034 for questions regarding EPA's NPDES Construction General Permit requirements.

Industrial Stormwater Permit
The Project Proponent has not acknowledged its requirement for an EPA NPDES Multi Sector General Permit (Industrial Stormwater) Program (https://www.epa.gov/sites/production/files/2016-04/documents/sector_s_airtransmaint.pdf).

Under the 2015 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP), EPA has updated the requirements for Sector S to incorporate the Airport deicing effluent limitation guidelines and new source performance standards. Airlines and airports conduct deicing operations on aircraft and airfield pavement to ensure the safety of passenger and cargo flights. In the absence of controls, deicing chemicals are widely dispersed causing pollutants to enter nearby rivers, lakes, streams, and bays. On May 16, 2012, EPA published the Airport Deicing ELG in the Federal Register to control the discharge of pollutants from airport deicing operations to surface waters. See 40 CFR Parts 9 and 449. The requirements largely apply to wastewater associated with the deicing of airfield pavement at primary airports. The rule also established NSPSs for wastewater discharges associated with aircraft deicing for a subset of new airports. These guidelines are implemented in discharge permits issued by states and EPA Regional Offices under the NPDES program. Therefore, the 2015 MSGP is incorporating the requirements from the Airport ELG that are appropriate to the kinds of discharges the permit authorizes. Additional information regarding this EPA permit may be found at: https://www3.epa.gov/npdes/pubs/sector_s_airtransmaint.pdf .

The Proponent is advised to consult with Abed Ragab at ragab.abdulrahman@epa.gov or 617-918- 1695 and Michelle Vuto at vuto.michelle@epa.gov or 617-918-1222 for any of its questions regarding EPA's NPDES stormwater permitting requirements.

Underground Injection Control
The Proponent acknowledges that "any/all stormwater management systems used at the airport meeting the requirements of the MassDEP UIC program will be registered."
The Project Proponent is advised in the event that the conveyances of stormwater through underground infiltration structures are planned that they are subject to the jurisdiction of 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. The statewide UIC program contact is Joe Cerutti, who can be reached at (617) 292-5859 or at joseph.cerutti@state.ma.us . All information regarding on-line (eDEP) UIC registration applications may be obtained at the following web page under the category "Applications & Forms": https://www.mass.gov/underground-injection-control-uic.

Waste Water Management. The Project Proponent responds to the requirement that FAA Part 139 airports to include provisions to collect wastewater containing extinguishing agents generated during

demonstrations and/or training events so that proper treatment and/or disposal can occur in conformance with Massachusetts requirements.

According to the Project Proponent: The Plymouth Municipal Airport is not a Part 139 Airport, nor does the airport have a dedicated firefighting/rescue unit nor store any AFFF as detailed in EPA 05 previously."

Bureau of Waste Site Cleanup (BWSC) Comment

Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

No additional releases have been reported in the vicinity of the project area since the submittal of the ENF. BWSC has no further comments or questions.

Interested parties may view a map showing the location of BWSC disposal sites using the MassGIS data viewer at MassMapper. Under the Available Data Layers listed on the right sidebar, select "Regulated Areas", and then "DEP Tier Classified 21E Sites". MCP reports and the compliance status of specific disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at: https://eeaonline.eea.state.ma.us/portal/dep/wastesite/

The Project Proponent is advised that if oil and/or hazardous material are identified during the implementation of this project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) must be made to MassDEP, if necessary. A Licensed Site Professional (LSP) should be retained to determine if notification is required and, if need be, to render appropriate opinions. The LSP may evaluate whether risk reduction measures are necessary if contamination is present. The BWSC may be contacted for guidance if questions arise regarding cleanup.

Spills Prevention and Control. The Department acknowledges that Cape Gateway Master Plan reports: "The contractor(s) will immediately clean up any and all spills of fuel, oil, or other potentially hazardous materials. Any and all reportable spills will be reported to the proper authorities (Plymouth and/or Carver Fire Departments, Plymouth and/or Carver Board of Health, MassDEP, etc.)."

The Project Proponent is advised that a spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from pre- and post-construction activities should be presented to workers at the site and enforced. The plan should include but not be limited to, refueling of machinery, storage of fuels, and potential on-site activity releases. Information related to spills prevention best practices may be obtained at the following web page: https://www.mass.gov/files/spill_prevention.pdf?

Hazardous Materials and Waste Management. The Project Proponent reports that its "construction will require storing, handling and using fuels, oils and other potentially hazardous materials. These materials will be managed per industry standards and applicable federal and state laws to avoid and minimize accidental releases to the environment. A detailed spill prevention and control plan will be included in the construction period SWPPP."

If any occupant of the Project generates hazardous waste and/or waste oil, that entity must register with the MassDEP or EPA to obtain a permanent identification number, as applicable, in accordance with 310 CMR 30.000 for legally generating and managing regulated waste. The Proponent is advised to consult at this MassDEP website https://www.mass.gov/guides/hazardous-waste-generation-generators to determine if the Proponent qualifies as a generator of hazardous waste and/or waste oil.

Bureau of Air and Waste (BAW) Comments
Air Quality.

Transportation Media
MassDEP reminds the proponent that transportation media at the facility shall meet the requirements stated in 310 CMR 7.11:

310 CMR 7.11: U Transportation Media
(1) Motor Vehicles.

a) *All motor vehicles registered in the Commonwealth shall comply with pertinent regulations of the Registry of Motor Vehicles relative to exhaust and sound emissions.*

b) *No person shall cause, suffer, allow, or permit the unnecessary operation of the engine of a motor vehicle while said vehicle is stopped for a foreseeable period of time in excess of five minutes. 310 CMR 17.11 shall not apply to:*

1. *vehicles being serviced, provided that operation of the engine is essential to the proper repair thereof, or*
2. *vehicles engaged in the delivery or acceptance of goods, wares, or merchandise for which engine assisted power is necessary and substitute alternate means cannot be made available, or*
3. *vehicles engaged in an operation for which the engine power is necessary for an associated power need other than movement and substitute alternate power means cannot be made available provided that such operation does not cause or contribute to a condition of air pollution.*

c) *310 CMR 7.11(1)(b) is subject to the enforcement provisions specified in 310 CMR 7.52.*

(3) Aircraft.
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.

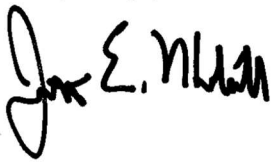
Solid Waste Management: The Project Proponent has adequately responded to the Department's Solid Waste requirements. The Solid Waste Management Section would like to remind the Project Proponent that if any re-use of asphalt is to occur on-site during the course of the project, a Beneficial Use Determination would be required if the Asphalt is painted or coated. Should processing of Asphalt at the site occur in order to facilitate re-use, Notification to the Department is required, regardless of the nature of the Asphalt.

If you have any questions regarding the Solid Waste Management Program comments above, please contact Mark Dakers via email at Mark.Dakers@mass.gov or Jennifer Wharff via email at Jennifer.Wharff@mass.gov.

General Contact Information

MassDEP has no additional comments other than the ones previously raised in review of the FSEIR and appreciates the opportunity to comment on this proposed Project. If you have any questions, 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: Gerard Martin, Regional Director
John Handrahan, Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, ADMIN
Maissoun Reda, Chief, Wetlands, BWR
N. Tay Evans, Wetlands/Boston, BWR
David Hilgeman, Wetlands/Boston, BWR
Brendan Mullaney, Chief, Waterways, BWR
Carlos Fragata, Waterways, BWR
Joseph Cerutti, Underground Injection Control, BWR/Boston
Daniel DiSalvio, Chief, Compliance and Enforcement, BAW
Mark Poudrier, Chief, Air/New Source Review, BAW
Christopher Redus, Air/New Source Review, BAW
Mark Dakers, Solid Waste, BAW
Jennifer Wharff, Solid Waste Management, BAW
Jeffrey Hunter, Solid Waste Management, BAW
Angela Gallagher, Audits, BWSC
Amanda Cantara, Site Management, BWSC

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16692	kayla	58 w pond rd	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
12-9-2024	almeida	--	--
Certificate Action Date	**Phone**	**State**	**Status**
12-9-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	kayla8122@aol.com	02360	

Comment Title or Subject

Topic: Reject expansion

Comments

Segoe UI | 10 pt | Paragraph

Please do not allow airport extension, this will create more air and noise pollution and is not what the community wants that lives in the s

Attachments

Update Status

Status

Accepted

SUBMIT

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BACK TO SEARCH RESULTS

View Comment

Comment Details

EEA #/MEPA ID
16692

Comments Submit Date
12-9-2024

Certificate Action Date
12-9-2024

Reviewer
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov

First Name
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State
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Zip Code
02360

Organization
--

Affiliation Description
Individual

Status
Opened

Comment Title or Subject

Topic: PUBLIC COMMENT ID16692 - Lisa Lantagne 12/9/2024 - Plymouth Airport Expansion

Comments

I am a (37 year) resident of West Plymouth and have lived within a mile and a half from the Plymouth airport with no issues for 35 years. In the last two (2) years, something has changed. We have multiple flight schools circling over our home on any given day. The planes seem to be flying at lower altitudes than ever before and are consistently louder, disturbing our peace and quiet in our backyard and even inside our home. And now, the private luxury jets are flying over our home at all hours of the day, and the 351 ft expansion is all about accommodating these luxury jets. The increased traffic and fuel sales will only help the airport make money, with no consideration to the inevitable negative impact on the residents lives, our real estate values, and the financial impact to the town with lower property tax assessments from this runway extension.

In Spring of 2024 we learned from a neighbor of the plans already underway (since 2022) for an extension of Runway 6/24 that runs parallel to South Meadow Road. This is the runway that flies over the most heavily concentrated noise-sensitive residential neighborhoods in West Plymouth and Carver. We were shocked that there was no publication of the extension or notices to the residents of the surrounding neighborhoods.

We immediately began attending Airport Commission meetings every month explaining our existing intolerable conditions of noise, low-flying planes, circling training planes and most recently luxury jets. We expressed our concerns of any runway extension with our already troubling conditions and asked why this was necessary. We were told it was for safety. We later learned that the 351 ft increase is directly related to accommodate the private luxury jets, that minimally use our airport now, but will increase usage with the extension of the runway. The runway, as it stands today, *IS* safe for the smaller planes and the existing luxury jets under the current weight restrictions. We request that the EPA re-evaluate this runway extension with more investigation into the current conditions surrounding the Plymouth Municipal Airport as we have been increasingly impacted negatively by current conditions that impact our homes, property values, but most importantly our quality of life and that of generations to come.

Ongoing research reveals that there are several negative environmental impacts to neighbors surrounding small airports including, but not limited to; air quality, noise quality, soil contamination and particularly for us, threats to our sole source water supply. We are very alarmed at the prospect of the extension with the increased flight activity of Jets the size of the Falcon 2000 that will follow. Please take our concerns seriously as the Plymouth Airport Commission and Management, do not.

Attachments

PUBLIC COMMENT ID16692 Lisa Lantagne 2024.1209.pdf(null)

Update Status

Status

Accepted

SUBMIT

Share Comment

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BACK TO SEARCH RESULTS

PUBLIC COMMENT ID16692 - Lisa Lantagne 12/9/2024

1.2 Purpose and Need

To stay current with certain Federal Aviation Administration (FAA) regulations and safety criteria, the Airport is implementing the 2022 Plymouth Municipal Airport Technical Master Plan Update (TMPU) and the 5-year Capital Improvement Plan (CIP) series of projects that will improve runway safety and support the foundation of the Airport's stability, functionality, and business. The proposed Projects are designed to meet the operational and efficiency requirements of the existing and future design Critical Aircraft as required by FAA. The proposed Projects are based on the TMPU and are listed in the Airport's 5-year CIP, see Figure

1-3. These documents serve as the framework for planning future development at the Airport and identify, not only for Airport components that do not meet current design criteria[1] established by the FAA, but also to address forecasted demand, capacity requirements, and operational improvements. The TMPU and CIP also allow for the planning necessary to preserve the Airport's role in the state, region, and national transportation system and to reaffirm and maintain the future function of the Airport.

The Airport is not seeking to increase airfield capacity nor expand the Airport but rather, meet airfield geometry standards, recommendations for runway length, and address current FAA safety and design criteria standards for the current family of aircraft operating at the Airport. As aircraft, technology, FAA safety and design criteria change, so must the Airport.

We disagree that the airport is not seeking to increase airfield capacity nor expand the airport.

- Quote from the "Massachusetts Statewide Airport System Plan (section 2-1)". "In the hopes to provide a significant value to business/corporate activity, as most corporate type of aircraft can operate in and out of airports having at least a 5,000-foot runway"
- The FALCON 2000 is considered the 'CRITICAL AIRCRAFT' yet it only contributes to 1.80% of the total operations of PYM. It has up to 19 seats.
- In the Plymouth Airport Master Plan Update 2022;
    - 3.6 Charter Service Assumptions (Page 39) Several charter operators conduct regular operations at Plymouth Municipal Airport. Nationwide operators including NetJets and Wheels Up contribute to the transient charter traffic and account for approximately 40% of these operations. Professional Airways, a charter operator based at PYM currently owns and operates two Falcon 2000's a Hawker 1000, a Hawker 4000, and Falcon 900EX. Each of these are B category aircraft with the Falcons and Hawker 4000 listed as B-II. Annually, Professional Airways accounts for approximately 250 of the airport's B-II operations with their owned and operated aircraft.
    - Table 3-9: Summary of Baseline Data - Operations by FAA Grouping (Table 3-7)
    - AAC/ADG (B-II) Operations (1,122) % Total Operations (1.80%)
    - 5.2 Alternative 1— No-Build Alternative (Page 52)
    - Air Safety Runway 6/24 currently meets all FAA safety requirements in accordance with AC 150/5300-13B. Although increasing the length of the runway pavement will in turn increase safety margins, the current runway length is not unsafe for aircraft adhering to capacity restrictions.
    - Ability to Serve the Critical Aircraft Alternative 1 does not change the current runway length and does not fulfill the minimum runway length requirement for the critical

aircraft, the Falcon 2000. Though the critical aircraft operate regularly from PYM, they do so at reduced capacity. Therefore, Alternative 1 does not meet the project's Purpose & Need.

- Let's start with the misleading term, to try and clarify, what it means by the statement "The runway expansion is being proposed for safety". Yes, adding runway length, any length increases safety, who can argue that! It does not mean our current runways are unsafe, what is really means, adding runway length improves the safety margins to the current aircraft that follow their landing and take-off weight restrictions.
- They are not saying larger jets will be able to come with the runway expansion. They are proposing increasing the runway length, which in turn will allow more of the super mid-size private jet activity like the (2) falcon 2000 already here. Currently these jets are extremely restricted because of the current runway length and can only carry 30% maximum payload capacity.

1.2.1 Aviation Planning Background Information

The planning challenge for airports is to strike an appropriate balance in providing runway length that will meet the requirements of the forecasted critical design aircraft while taking into consideration airport constraints and the surrounding community.

Again, The FALCON 2000 is considered the 'CRITICAL AIRCRAFT' yet it only contributes 1.80% of the total operations of PYM. It has up to 19 seats. So WHY is this airport able to call this 'critical aircraft'?

2.1 Runway Extension

In addition to the "No Build" alternative, the Airport evaluated three additional alternatives for extending Runway 6 based on the needs of the critical aircraft, see Appendix B – Runway 6 Extension Alternatives. Ultimately, the shortest extension was selected even though it does not meet the requirements for 60% capacity of the critical aircraft. The Airport determined that the 351-ft extension was the Preferred Alternative when taking into consideration project Purpose and Need, feasibility, and minimization of environmental impacts. The proposed runway extension does not increase Airport operational capacity or allow larger aircrafts but rather address FAA safety and design criteria deficiencies such as runway length for the current aircraft operating at the Airport. As demonstrated by the operational data provided in Chapter 1.0 of the Draft EA/EIR, historical operations were far greater than current and modeled future operations presented. As aircraft, technology, FAA safety and design criteria change, so must the Airport.

2.1.1 Alternative 1-No Build Alternative

The No Build or "No Action" (under NEPA) is a scenario in which the Airport does nothing and the existing condition remains the same. This does not serve the Purpose and Need of the project but is required to be carried forward under NEPA analysis. There would be no change to the current runway or taxiway lengths; therefore, this alternative does not fulfill the minimum runway length required for the critical aircraft as analyzed in the Technical MPU.

2.1.2 Alternative 2-351-foot Extension: Extension of Runway 6 approach end, southwestward by 351 feet for a total runway length of 5001 feet (preferred alternative).

This alternative includes the extension of the Runway 6 approach end, southwestward by 351 ft for a total runway ~~length~~ of 5001 ft. The Technical MPU determined that this length does not meet the

recommended unconstrained runway length of 5,500 ft but would increase available pavement for use and increase safety margins. The Runway 6 extension would be 75-ft wide and entails extensions of the 35-ft wide parallel Taxiway E and Taxiway A to meet the new runway end. No easements are required to
be obtained.

2.1 Runway extension 351 ft should NOT be the preferred alternative for reasons stated above. 2.1.1 Alternative 1-No Build Alternative is the only option that should be considered due to the impact to the surrounding residential neighborhoods that will be significantly impacted by the increase in luxury Falcon jet activity. We have canvassed the surrounding neighborhoods and 98% of people interviewed were against expansion and fearful of the impact to their health and real estate values of their treasured homes. Why won't the Airport take their neighbors into consideration?

3.0 GROUNDWATER
Please note, the Airport has no history of using or accidental releases of Perand Polyfluoroalkyl Substances (PFAS) containing Aqueous Film Forming Foam (AFFF) nor storage of such materials at the Airport.

We believe the increase in traffic to the airport increases the possibility of accidents that will require the use of PFAS especially at a non-towered airport where small planes are now competing with Falcon 2000 jet size for airspace and landing space. Our sole source Aquifer is the only source for Plymouth and multiple surrounding towns and should be always protected. Can this be taken into consideration?

3.1 Sole Source Aquifer Protection
There have been multiple prior studies of groundwater at the Airport. A Groundwater Management Plan (GMP) was completed in 1992 by IEP in support of a Master Plan update that includes information on testing of soils and groundwater, groundwater contours and flow direction of groundwater at the Airport. A second study was completed in support of the design and construction of the Airport's wastewater treatment plant in 2001 by Sanborn Head Associates. These studies utilized monitoring wells placed throughout the Airport. Based on these reports, there is a local groundwater divide on the Airport. In the eastern portion of the site, ground water flow is towards the southeast. In the western portion of the site, ground water flows towards the southwest. In the area of the Runway Extension, groundwater flows in a southeasterly direction, towards Carver. Groundwater elevation is 121.5 feet (NGVD 29) near the intersections of the runways, flowing southwesterly to an elevation of 119.5 feet by the proposed extension. The Hydrogeologic Evaluation Report (HER)1 for the wastewater treatment plant and leaching field for the Plymouth Municipal Airport noted "that the subsurface soils consist of a surficial stratum of loamy sand material about two feet thick, overlaying a natural, stratified deposit of highly permeable sand, which extends to a depth of at least 21.5 feet below ground surface." Based on previous depth-to water measurements and top-of-well casing surveys, groundwater elevations range from 118 to 121 MSL across the airport.
1 Sanborn, Head, and Associates, Hydrogeologic Evaluation Report Groundwater Discharge Permit for Wastewater Treatment Facility at Plymouth Municipal Airport, 2001.

Is a 2001 study sufficient based on current conditions (including sand mining) that is impacting the quality of our sole source aquifer?

3.1.1 Groundwater Protection Plan
Information on potential contaminant sources and contaminants of concern relating to construction and expanded airport operations was previously included in the Draft EA/EIR and is repeated below. Baseline groundwater contaminant condition reporting is not proposed as this information is not currently collected at the Airport and all prior reporting as noted above, does not indicate the presence of soil or groundwater contamination.

We need baseline groundwater contaminant condition reporting. Prior reporting is from 2001, this is 23-24 years later.

RI ARTICLE 3/21/2024
Final Forge, a company that had operations at Plymouth Municipal Airport and whose website says it makes "humancentric technology for the military, law enforcement, and homeland security," has been fined $18,400 by the state for improperly transporting hazardous materials out of town.
The Massachusetts Department of Environmental Protection levied the fine, saying Final Forge moved hazardous waste from the airport to the Clean Earth disposal facility in Rhode Island.
In a press release, the Department of Environmental Protection said Final Forge took the waste from its hangar in Plymouth to a Clean Earth facility in Providence. The agency said several 55-gallon tanks, as well as gallon- and pint-size containers of chemicals, were unidentified and were not accompanied by the hazardous waste manifest required by law. Clean Earth did not accept the materials, but Final Forge abandoned them at the loading dock anyway, the agency said.
Investigators also found two additional 55-gallon tanks of chemicals at the airport that had been improperly disposed of, the state said. The waste containers held acids, zinc nitrate, barium sulfide, chromium, barium, waste oil mixed with water, waste gasoline, and resins and amines, said DEP spokesperson Edmund Coletta.

3.2 Drinking Water Wells and Wellhead Protection Areas
The Town of Plymouth's Public Water Division operates thirteen (13) public water supply wells, including
the Federal Furnace Well which is the well closest to the Airport. The Zone II area for the well extends approximately 150' beyond the Airport's boundary in the wooded area along the northeast side. Additionally, there are numerous public water supplies (i.e., private wells) mapped within five miles of the Airport, along with their individual wellhead protection areas (Figure 3-4). The Town of Carver maintains only the North Carver Public Water Supply wells (three total wells) as public water supplies and the rest of the Town of Carver water is supplied by private wells. The public water supply wells in the Town of Carver are further away from Airport grounds than the Federal Furnace Well in Plymouth. There are not any mapped Wellhead Protection Areas (WPA) on the Airport property.
The Town of Plymouth started testing public water supply wells for PFAS (Per & Polyfluoroalkyl Substances) in 2021 PFAS are a class of synthetic chemicals that are used in consumer and industrial products.3 The hazards of PFAS to humans came into the public eye in the mid-2010s even though PFAS has been used in many common products since the 1940s.4 PFAS are known to be "persistent in the environment, bio-accumulate in organisms, and toxic at relatively low part per trillion (ppt) levels."5. PFAS has not been detected in the Federal Furnace Well since testing began. The results were published by the Plymouth Water Department in their annual water quality report. All wells in Plymouth were tested a total of four times and no PFAS was detected for almost all of the wells.

The latest PFAS testing was completed by the Plymouth Water Department in January of 2024, and no detectable amount of any PFAS chemicals were found at Federal Furnace well (see 2024 PFAS sampling results in Attachment D).

3.3 Groundwater Monitoring
The Airport has conducted groundwater monitoring periodically for prior projects but does not maintain any actively sampled wells at this time. The most recent monitoring conducted in 2012 was groundwater monitoring associated with the wastewater treatment plant at the Airport which included testing levels of VOCs in the water. The Town of Plymouth, Sewer Division determined that there were no violations to the accompanying Groundwater Discharge Permit.

2012 Groundwater monitoring was the last time? We firmly believe the groundwater monitoring including private wells should be actively monitored to assess the current status of our water.

Comments and replies

MEPA 22 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.
The Airport has conducted groundwater monitoring periodically for prior projects but does not maintain any actively sampled wells at this time. The most recent monitoring conducted in 2012 was groundwater monitoring associated with the wastewater treatment plant at the Airport which included testing levels of VOCs in the water. The Town of Plymouth, Sewer Division determined that there were no violations to the accompanying the Groundwater Discharge Permit.

Can current groundwater testing and monitoring be enforced?

SECRETARY'S CERTIFICATE ON THE DRAFT EA/EIR

MEPA 37 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.
Table 3.1-2 contains a list of hazardous materials and storage locations at the Airport.
Sectio 3.1.1 discusses the Airport's groundwater management plan.

How can we trust the airport when instances like the RI article 3/21/2024 are our reality?
REFER TO comment above) RI ARTICLE 3/21/2024.
Final Forge, a company that had operations at Plymouth Municipal Airport and whose website says it makes "humancentric technology for the military, law enforcement, and homeland security," has been fined $18,400 by the state for improperly transporting hazardous materials out of town.

Public drinking water supply; Where are the RECENT testing of the following; Federal Furnace well, Town water, DPW Tests quarterly? Private water supplies; Mobile Homes, group wells, Private homes

Hydrology Study, Elevation & Flow directions, sufficient based on CURRENT CONDITIONS? Sand Mining etc. Last study done in 2001

Current quality at the airport - and FURTHER RISK? How groundwater is flowing below the airport and towards the wells.

Lead - Where are the recent testing of lead in our SOIL and Groundwater? With all the increased traffic over the last two years, updated studies need to be done based on the CURRENT conditions at the airport

4.2 Community Outreach
The Proponent provided advanced notification of the ENF filing to a list of community-based organizations and tribes/organizations listed on the EJ Reference List provided by MEPA. The EJ screening form was also provided with information on ways to request a community meeting. A project specific e-mail address was also created for communication about the project.1 An updated EJ screening form will be sent to the organizations on the EJ Reference List making it clear that the whole TMPU is under MEPA review with opportunities for public involvement.

To date, four public meetings have been hosted, both in-person and virtually, to provide information on the project and solicit comments. See Appendix F of the Final EIR for the Airport's Public Participation Plan.

The Airport did not contact the thousands of residents in Plymouth and Carver. To date, most residents of both towns do not even know about the proposed runway extension. The four public meetings were attended by an average of 30 people in both towns. How can the airport claim they have satisfied the Airport's Public Participation Plan?

To note further. Since we learned of the Airports proposed expansion in Spring of 2024 we have gone to every Airport Commission meeting since. We are treated with disdain, disrespect and insult every time we try to tell the Commission what we are experiencing over our homes on a daily basis including but not limited to; loud, low flying planes, circling of planes over our homes, now jets flying over our homes ignoring the noise abatement rules. We are treated as if we are not making sense, because the airport does not see any increase in activity. Well, we were shocked to learn that the airport does not accurately count flights, and they estimate is, they only track less than 50% of their flights. The training schools do not count touch-and-go's in tracking flights. So how can anyone judge the volume of the increase in traffic after the 351 extension?

4.4 Assessment of Existing Unfair or Inequitable Environmental Burden
4.4.1 Vulnerable Health Criteria

When was this testing done? We have asked for lead testing to be done on our children in Plymouth and we have asked for lead testing in our air and soil and have been told that it is 'not required' so Epsilon will not do it. We believe that without current testing it is irresponsible of the FAA and MA DOT to proceed with this project.

MEPA 07 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 Airport is not seeking to increase airfield capacity nor expand the Airport but rather, meet airfield geometry standards, recommendations for runway length, and address FAA safety and design criteria deficiencies such as runway length, taxiway configurations, and safety area geometry for the current family of aircraft operating at the Airport as stated in Chapter 2 of the Final EIR. As demonstrated by the operational data provided in Chapter 1.0 of the Draft EA/EIR, historical operations were far greater than current and modeled future operations presented. As aircraft, technology, FAA safety and design criteria change, so must the Airport.

The Airport commission and management DENY the fact that traffic has increased over the last two years, unbearable by the residents in the noise sensitive areas surrounding the airport. Because they don't count the touch & go's and estimate takeoff's and landings they cannot prove or disprove their statements. We request current updated traffic documentation and analysis be done to understand the reality of current traffic at the airport and the project the increase in traffic over the noise sensitive neighborhoods. Quote from the "Massachusetts Statewide Airport System Plan (section 2-1)". "In the hopes to provide a significant value to business/corporate activity, as most corporate type of aircraft can operate in and out of airports having at least a 5,000-foot runway". This quote states that they are trying to increase business/corporate (and luxury that they don't mention) activity. Doesn't provide significant value to business/corporate activity mean more activity flying over residential neighborhoods?

MEPA 14 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.

Noise, air, and traffic analyses presented in the Draft EA/EIR are based on the forecasts in the Technical Airport Master Plan update, which provides numbers of airport/aircraft operations with factors to increase operations for future scenarios. There are not any revised estimates to update. Additional information is presented regarding conclusions and mitigation measures.

The projections are based on incorrect information as the Airport does not count the 'touch & go's. Nor do they count the planes accurately, as estimation is included in their count.

MEPA 37 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.

Table 3.1-2 contains a list of hazardous materials and storage locations at the Airport. Sectio 3.1.1 discusses the Airport's groundwater management plan.

Please refer to the RI article 3/2024. We do not have any faith in the Airport management measures and implementation to reduce and control pollutants. How can we protect the residents from the sole source aquifer contamination?

EPA 02 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 description of any past contamination events at the airport along with baseline groundwater contaminant conditions.
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.

How can the residents feel confident in the Airport when they had the transportation of contaminants issue that was publicized in 3/2024? If it hadn't become a news article, would the residents of Plymouth/Carver ever have known about it?

CLWC 03A According to the FAA, lead is still used in some aviation fuels…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?

The airport's response to this is inadequate. They have done NO current lead testing in Air or Land surrounding the airport that is all residential, with homes, schools, churches, playgrounds. There is total disregard for the impact of these impacts on residents as we were told they would NOT perform current testing on either.

CLWC 14 The Airport must conduct a thorough air pollution study to obtain baseline, current air pollution levels and future impacts, including 10 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.
The Airport is in compliance with FAA requirements for air emissions for NEPA review and MEPA GHG analysis for stationary sources. The Airport is located in a national ambient air quality standards (NAAQS) attainment area; is not in an Indirect Source Review designated area of Massachusetts; and is not located in an area with State Implementation Plan requirements. <u>Therefore, no formal Emissions Dispersion and Modeling System or other air quality modeling is required</u>. Instead, a qualitative analysis examining the background pollutant levels which are well within applicable air quality standards, and potential for changes and/or increases in air emissions was completed.
The Project is not anticipated to result in additional emissions from any changes in operation due to several factors.

<u>This response is outrageous</u>. Because they don't HAVE to, the airport will do nothing to protect the residents of Plymouth from harm.

The Proposed Actions are anticipated to have little effect on air traffic volume over the next 5-7 years showing a modest increase of 1,000 operations by 2030, and will have minor effects on air traffic patterns, and therefore are not expected to have an adverse effect on air quality.

Another outrageous statement. We have seen an increase in traffic just this summer that exceeds 1,000 operations. And because they don't 'count' the takeoff's and landings, how can they possibly project any traffic increase?

CLWC 15 How is the large state designated reserve that is Myles Standish State Forest affected by aircraft noise, light pollution and air pollution?

Myles Standish State Forest, similar to other areas surrounding the airport, may experience ambient noise from many noise generating sources such as highways (Route 3) transmission line ROWs, internal camp sites and recreational users, motor vehicles, and other facilities and roadways throughout MSSF. The project team is unaware of and does not anticipate any impacts of the proposed Projects to Myles Standish State Forest.

The famous line from the Airport Commission; they "don't anticipate" anything, increased traffic, pollution, noise.... We already feel the impact and so do the millions who visit Myles Standish State Forest for peace and quiet in a forest supporting wildlife and public recreation. The benefits of this contiguous open space will be impacted.

AM 09 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.

Noise analysis was discussed in Sections 4.3.5, 4.3.7 and 5.10 of the Draft EA/EIR. Noise modeling using the FAA-approved Aviation Environmental Design Tool (AEDT) system was completed using 2021 data. The analysis concluded that "there are NO SIGNIFICANT IMPACTS on noise and noise-compatible land use beyond the existing condition as a result of the Proposed Action." Existing and proposed noise contours were provided in Appendix J of the Draft EA/EIR. More readable noise contours are provided in Appendix H in this document.

When was Covid? Might that impact their study? Can they look at summer 2022compared to Summer 2024?

SR 02 I could go on and on, but the bottom line is the proposed airport expansion 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.

As discussed in Chapter 1, Airport operations are projected to increase slightly, regardless of whether this runway extension is implemented. The Airport is not seeking to increase airfield capacity nor expand the Airport but rather, meet airfield geometry standards,

recommendations for runway length, and address current FAA safety and design criteria standards for the current family of aircraft operating at the Airport. As aircraft, technology, FAA safety and design criteria change, so must the Airport.

How can they make this statement when they don't count takeoffs and landings now?

DS 02 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.

Comment noted. The Airport strives to be a good neighbor and provides a significant benefit to the community in the form of economic inputs, emergency response services (MedFlight, State Police) and community events.

The current Airport Management and commission do not 'strive to be a good neighbor'. They are dismissive of residents' concerns on a daily basis. Also, the airport was here before the residents, but the residents were here before the extensions of the runway that have already occurred. When is enough, enough? Will the airport eventually take homes to expand again in the future after they ruin our property values as they bring in luxury jet traffic over our homes?

We ask that the EPA take all our comments into consideration. We plead with the EPA to pause this project. Take a current, closer look at what is actually happening in West Plymouth and Carver neighborhoods surrounding the airport. There is not one single resident that I have met, that does not say they have been feeling the increase in traffic over the last two years. This runway extension will only increase traffic, and harm our residents.

Please take a closer look for the residents of Plymouth.

Outlook

FW: MEPA PUBLIC COMMENT ID16692 - Please reject Plymouth Airport Expansion

From MEPA (EEA) <mepa@mass.gov>
Date Mon 12/9/2024 3:06 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

From: Sandy Fosgate <fosgatesandy@gmail.com>
Sent: Monday, December 9, 2024 2:56 PM
To: ENV Internet (EEA) <env.internet@mass.gov>; zzTepper, Rebecca (AGO) <rebecca.tepper@mass.gov>; MEPA (EEA) <mepa@mass.gov>
Subject: MEPA PUBLIC COMMENT ID16692 - Please reject Plymouth Airport Expansion

MEPA PUBLIC COMMENT ID16692
Plymouth Airport Expansion Proposal

Dear Secretary Tepper & MEPA Officials,

Please accept this public comment objecting to the proposed expansion at the Plymouth Municipal Airport. (The MEPA public comment portal is apparently not currently functioning.)

Needlessness
The airport's master plan lists several options, one of which would impose no additional environmental burden: Alternative #1, the “no-build” (no change) option. Instead, the Plymouth Airport Commision is pushing an expansion for the benefit of a wealthy few in a very environmentally-sensitive area, which is already under tremendous pressure from sand & gravel mining and development.

Safety
The airport commision has made vague, unspecified claims of FAA safety requirements, yet acknowledges that the no-build option would allow the airport to continue to operate within all FAA safety parameters. Safety services that benefit the community, such as medflight, search & rescue, and flight training, as well as other benefits such as employment and economic input into the local economy, would all continue uninterrupted.

Hidden purpose
The airport claims that air traffic wouldn't increase, stressing that the airport's BII designation wouldn't change. However, a careful reading of the Technical Master Plan on the airport's website reveals that the true goals of the expansion are twofold:
firstly, to increase private, luxury jet traffic in and out of Plymouth, by enabling 8-10 passenger jets to carry a heavier load, such as enough fuel to fly farther non-stop, and to operate in more weather conditions, and secondly, to enable the airport to sell more aviation fossil fuel. The expansion is specifically tailored around the Dessault Falcon 2000 jet, and to a private company, Professional Airways, which flies charters from Plymouth directly to destinations such as Paris and Hawaii.

Public drinking water
The airport is located over our sole-source aquifer, which is highly transmissive, and vulnerable to contaminants, such as spilled fuel. Exhaust settles onto soil and washes directly into the aquifer. The Plymouth area is already experiencing a decline in public water quality, with no plan or funding source for mitigation and water treatment.

Climate
Obviously, any increase in fossil-fuel-powered aviation would contribute heavily to climate change, and deter from the Commonwealth's ability to reach its climate goals. Southeast Mass. is particularly vulnerable to the effects of climate change, due to sea level rise, and the flammability of our pine barrens habitat, especially as drought increases. The airport commission has made no attempt to transition even partially to renewable energy; electric airplanes and charging stations are merely mentioned, but not part of the plan and grant application.

Rare species and habitat
The airport is located in a biodiversity hot-spot, and the NHESP Advisory Committee just added more species in our area to the rare species list at its November meeting. Rare species and priority habitat would be harmed by both construction and on-going increased use. Both are already at high risk due to corporate capture of regulatory agencies by the "cranberry" (mining) industry and developers abusing the 40B statute, and complicit local officials.

Public facilities
Air traffic already disturbs the wildlife and wilderness experience in Myles Standish State Forest, which is the Commonwealth's largest public property, and nearby Wildlife Management Areas. These jewels are a great public resource for residents, and attraction for tourists.

Historic Significance & Security Risk
Plymouth is home to several symbols of our National heritage which are known world-wide, as well as a repository of nuclear waste. It is a miracle that we have yet to suffer a terrorist attack to date. Increasing the airport's ability to receive incoming jets which are not subject to any sort of TSA screening or air traffic control is an unacceptable risk.

Please do not let a few disingenuous, private interests override the overwhelming public interest in keeping our municipal airport appropriately-sized for our community.

Thank you for your consideration.
Sandra Fosgate
22 Jaye Street
Plymouth, MA 02360

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16692	STEVEN	21 BALDWIN CIR	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
12-9-2024	LANTAGNE	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
12-9-2024	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Nicholas Moreno, (617)699-4254, Nicholas.Moreno@mass.gov	SLANTAGNE@COMCAST.NET	02360	

Comment Title or Subject

Topic: EEA# 16692

Comments

Steve Lantagne, 21 Baldwin Cir, Plymouth, Ma comments related to the FEIR (EEA# 16692) and general concerns and comments.

Every resident, every town member, every selectman, town manager and all the people on the town's payroll as well as the unpaid volunteers and support staff is supposed to be looking out for what is in the best interest of the town residents. It should not be a small group of people in a back room at the airport making decisions as to what is in the best interest to them regardless of the potential negative impact to every resident! There are also a number of conflicts of interest with some of the parties in charged with running the airport that needs to be addressed moving forward.

Our future is at stake. Our kids and grandkids' futures are at stake. What do we want to be known for in years to come? We are such a unique town. Let us not be known as the ones who allowed this to be the turning point, like the numerous airports around us, when we became the next Hanscom airport and the chaos that comes with more private luxury jets. We cannot wait until there is no turning back!

Accountability: How can we possibly continue to let a few people at the airport determine what is in the best interest related to the future of the town? How can we let a few people have the power that can have such adverse effects to our quality of life?

Accountability, honesty, transparency. That is all anyone can ask. And that is what we asked for the Petition for Warrant Article submitted on 8/9/24, to put a moratorium with any expansion of the runway without voted on by the residents. Unfortunately, somehow the private airport lawyers convinced a few people to stop a vote without any discussions with the residents, the selectmen or the Advisory and Finance committee. Again, how can a few have so much power on the many?

How did we get here?

- The airport commission stands by that expanding runway to 5,001 feet is all about increasing safety margins. Who can argue, extending the runway 1 foot will increase safety.
- I take exception that in one statement they say it is to increase safety margins, but the reality is 5,001 feet will allow more of the private luxury jets like the (2) Falcon 2000 jets that are currently based here carry a lot more fuel, how is that safer for anyone?
- Please provide the analysis/study of what is the percent of increased safety with the private luxury jets carrying a lot more, fuel?

➢ Currently we are living in unacceptable environmental, physical and mental health conditions and our quality of life is the issue and is at stake.

➢ Let's fix our current problems before we add more.

➢ With more jets flying in an out of our un-manned/non-towed airport, how does it make it safer for the recreational smaller, slower, single prop aircraft?

➢ With more jets flying in an out of our un-manned/non-towered airport, how does it make it safer for the training school students, flying in the smaller, slower, single prop aircraft, whose activity has been increasing over the last few years?

- With more jets flying in an out of our un-manned/non-towed airport, how does it make it safer for the training school students, learning how to fly in the smaller, slower, single prop aircraft while performing their repetitive circling of the airport with landings and take offs?

- With more jets flying in an out of our un-manned/non-towed airport, how does it make it safer for our teen-age students learning to fly at the flight schools in the smaller, slower single prop aircraft?

- With jets carrying more fuel, how is it safer for anyone landing and taking off over our back yards?

Attachments

steve.lantagne EEA# 16692 coments-3 09dec24.pdf(null)

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Status

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BACK TO SEARCH RESULTS

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- Currently we are living in unacceptable environmental, physical and mental health conditions and our quality of life is the issue and is at stake.
- Let's fix our current problems before we add more.

- With more jets flying in an out of our un-manned/non-towed airport, how does it make it safer for the recreational smaller, slower, single prop aircraft?

- With more jets flying in an out of our un-manned/non-towered airport, how does it make it safer for the training school students, flying in the smaller, slower, single prop aircraft, whose activity has been increasing over the last few years?

- With more jets flying in an out of our un-manned/non-towed airport, how does it make it safer for the training school students, learning how to fly in the smaller, slower, single prop aircraft while performing their repetitive circling of the airport with landings and take offs?

- With more jets flying in an out of our un-manned/non-towed airport, how does it make it safer for our teen-age students learning to fly at the flight schools in the smaller, slower single prop aircraft?

- With jets carrying more fuel, how is it safer for anyone landing and taking off over our back yards?

  FEIR: Future operations were forecasted per the methodology discussed in both the TMPU and the Draft EA/EIR. See Table 1-2. These aircraft operations forecasts are projected for future conditions regardless of the implementation of the Projects proposed herein.

Table 1-2 Adjusted Forecast of Activity by Aircraft Type

Year	2021		2026		2031		2041	
Aircraft Type	Local	Itinerant	Local	Itinerant	Local	Itinerant	Local	Itinerant
Single Engine	22,510	18,984	22,970	19,372	23,445	19,751	24,397	20,535
Multi Engine	2,979	2,513	3,034	2,558	3,058	2,590	3,150	2,685
Turboprop	3,972	3,350	4,069	3,431	4,168	3,515	4,362	3,679
Turbojet	2,317	1,954	2,370	1,998	2,458	2,073	2,630	2,217
Rotorcraft	1,324	1,117	1,379	1,163	1,432	1,207	1,539	1,295
Glider	0	0	0	0	0	0	0	0
Light Sport	0	0	0	0	0	0	0	0
Military	0	0	0	0	0	0	0	0
Electric	0	0	0	0	0	0	0	0
Total	61,021		62,344		63,696		66,489	

- Where are the specific studies of the increase in aircraft activity after an airport expands to a 5,000 ft runway?

- How can an EPA study be conduct and accurately analyze the impact to the environment and residents of Plymouth when it is not accounting for any negative impact related to

an additional increase in “B-II” jet activity or any activity when a runway is expanded to a minimum of 5,001 ft?

- Where are the environmental impact studies using realistic numbers of the true actual corporate/private jet activity when a runway goes over 5,000 feet?
- Where are the specific studies of the increase in corporate/private jet (B-II) activity after an airport expands to a 5,000 ft runway?

- Where is the specific forecast for the class of the “B-II” super- mid-size jets, like the (2) that are currently based here that operate at extremely limited capacities, which currently is less than 2% of all operations as stated in the Plymouth Airport master plan?

FEIR: The Airport is not seeking to increase airfield capacity nor expand the Airport but rather, meet airfield geometry standards, recommendations for runway length, and address current FAA safety and design criteria standards for the current family of aircraft operating at the Airport. As aircraft, technology, FAA safety and design criteria change, so must the Airport.

Why not 100 feet, why not 200 feet, why not 300 feet?

Increasing the runway and taxiway to a total of 5,001 feet is directly related to the expanding the capacity of the runway/airport to accommodate more of the “B-II” aircraft activity like the (2) Falcon jets that currently based here and operate at extremely restricted 30% maximum capacities with the current runway length. Also, the additional improvements to the Navigational Aids “Navaids” along with the current and future increase in building more hangers and other infrastructure updates will contribute to expand the “B-II” aircraft activity.

Our concern has always been, who truly believes by 2031,” B-II” jet activity will only increase by less than 2% per week if the runway is extended, as stated in the Plymouth Airport Master Plan?

Every condition for why 5,001 feet listed below could contribute to a potential of increased jet activity in the future.

<u>Why 5,001-feet and what has potential to increase the super mid-size jet activity:</u>

- Isn’t it true, In the Airport Master Plan the commission wants to increase the super mid-size jet activity, better known as corporate/private luxury jets like the (2) Falcon 2000 that are current based at Plymouth.

- Isn't it true, in 2022, the Airport Master Plan was updated by the airport commission to declare the Critical aircraft to be the "B-II" grouping size of aircraft. This size is that of the Falcon 2000 & private super midsize luxury jets, even though it only accounted for less than 2% of all operations.
- Isn't it true, that Matt Cardillo stated in the "9/11/2024 Plymouth Advisory & Finance Meeting", "A LOT OF" insurance companies require a 5000 ft runway or greater for these corporate/private jets to use an airport. This class of jets are typically not allowed to land here and the ones that do have the highly restricted 30% maximum payload capacity which makes it impractical to land and take-off here!
- Isn't it true removing the insurance company 5,000 ft restrictions increases the potential of more jets?
- Isn't it true, these super-midsize corporate/private jets do not typically come to Plymouth because it is not practical because of their current extreme restricted weight capacities, which limits their ability to carry passengers, luggage, cargo and required fuel because of the current runway length.
- Isn't it true, in the "Massachusetts Statewide Airport System Plan (section 2-1)" states:

  > "In the hopes to provide a significant value to business/corporate activity, as most corporate type of aircraft can operate in and out of airports having at least a 5,000-foot runway."

- Isn't it true, Matts Cardillo's agenda has been to increase charter jet activity by increasing the runway as he stated in his 1st interview after being hired in 2022.
- https://capeplymouthbusiness.com/new-manager-takes-flight-at-plymouth-municipal-airport/.
- Isn't it true, Matts agenda is to increase fuel sales and fees with more private luxury jets as stated in the Plymouth Airport Master Plan.
- Isn't it true, with the runway extension, Jets have the potential to travel to further & different destinations with the increased fuel and weight capacities and that will increase new jet activity.
- Isn't it true, with the runway extension, Jets have the potential to come from further destinations with the increased fuel and weight capacities and that will increase new jet activity.
- Isn't it true, with a minimum length of 5,000 ft., it puts us into a different category of airports and Plymouth would show up to aviators on a new list of maps, charts and apps that we previously weren't on and has the potential increase new jet activity.**"**
- Isn't it true, that Runway 6/24 currently meets all FAA safety requirements in accordance with AC 150/5300-13B. Although increasing the length of the runway pavement will in turn increase safety margins, the current runway length is safe for aircraft adhering to capacity restrictions.
- Isn't it true, jets like the super mid-size Falcon 2000 will be able to carry more fuel landing and taking-off over our back yards?

- Isn't it true that the (2) new 100 feet x 100 feet aircraft hangars could accommodate (2) addition super mid-size jets like the Falcon 2000?
- Isn't it true**,** that private entities could build additional hangars at the airport that could house more jets?
- Isn't it true, in the Plymouth Airport master plan there is a proposal for the potential of a 24-hour self-service fuel Kiosk, so they can sell more fuel in the middle of the night.
- Isn't it true, that a 24 fuel Kiosk has the potential of more planes coming in the middle of the night?

FEIR Runway Extension"

In addition to the "No Build" alternative, the Airport evaluated three additional alternatives for extending Runway 6 based on the needs of the critical aircraft, see Appendix B – Runway 6 Extension Alternatives. Ultimately, the shortest extension was selected even though it does not meet the requirements for 60% capacity of the critical aircraft. The Airport determined that the 351-ft extension was the Preferred Alternative when taking into consideration project Purpose and Need, feasibility, and minimization of environmental impacts. The proposed runway extension does not increase Airport operational capacity or allow larger aircrafts but rather address FAA safety and design criteria deficiencies such as runway length for the current aircraft operating at the Airport. As demonstrated by the operational data provided in Chapter 1.0 of the Draft EA/EIR, historical operations were far greater than current and modeled future operations presented. As aircraft, technology, FAA safety and design criteria change, so must the Airport.

<u>They said they had 4 options.</u>

- Option #1: Do nothing
- Option #2: Increase runway length by 351ft (total of 5,001 ft)
- Option #3: Increase runway length by 550 (total of 5,200 ft)
- Option #4: Increase runway length by 850 (total of 5,500 ft)

- **What Options #5, How to improve current conditions?**
  - How to improve the harmony of living with their neighbors?
  - How to improve the airport's relationship with its neighbors?
  - How to improve the current noise related issues?
  - How to improve the current noise abatement policies?
  - How to reduce the percentage of flights in the Noise Sensitive Zones?
  - How to reduce the number of low flying aircraft?
  - How to educate the local aviators on how flying low have adverse effect on the community.
  - Airport claims they have no control, once planes are in the air, they say it's in FAA jurisdiction.
  - How about setting up meetings with the FAA & concerned neighbors?

- How about educating the neighbors how to put in complaints with the FAA or even the local police?
- How about the education of the neighbors with what are or aren't the rights of living near the airport?
- How to improve the early and late times aircraft are takeoff and landing?
- How to improve how the airport communicates with its neighbors?
- How to reduce jet traffic instead of updating infrastructure to add increased capacity?
- How to improve the repetitiveness of flying around and around for hours on the same path.
- How about a plan to monitor noise levels?
- How about ways to decrease aircraft activity and do it safely?
- How about figuring out a way to gain the trust of their neighbors?

How about Option #6 -

- Update both runway Navaids (Navigational Aids) to improve the safety margins to both runways under all conditions?

How about Option #7 - Increase both runways by 100 feet.

- Increase the current safety margins to both runways.

FEIR: The proposed Projects are designed to meet the operational and efficiency requirements of the existing and future design Critical Aircraft as required by FAA.

- Why is the "B-II" class of aircraft classified as the critical aircraft, for the Plymouth airport and the proposed extension of 6/24 will make it the runway of choice and will directly impact more than 80% of all of Plymouth homes in the "Noise Sensitive Areas "?
- When and who allowed the Falcon 2000 jets here in the 1st place with these extreme landing and take-off restrictions?
- Who is responsible and accountable for allowing the large super mid-size "B-II" jets, like the Falcon 2000 to be based in Plymouth without the residents input?
- What are the steps to reclassify the critical aircraft designation?
- Why don't we change the critical aircraft designation to stop anymore expansion, enough is enough.

FEIR: Sole Source Aquifer Protection

There have been multiple prior studies of groundwater at the Airport. A Groundwater Management Plan (GMP) was completed in 1992 by IEP in support of a Master Plan update that includes information on testing of soils and groundwater, groundwater contours and flow direction of groundwater at the Airport. A second study was completed in support of the design and construction of the Airport's wastewater treatment plant in 2001 by Sanborn Head Associates.

- How does the EPA allow groundwater studies from 1992 & 2001 allowed in baselining our current environmental conditions?
- How can studies decades old be used and be valid with all the Topographic changes of our environment as a result of large population growth, development expansion along with the unknown adverse effects of sand mining effects over the last 20-30 years.
- How can these old studies be valid when private wells were not monitored or part of the studies?
- Where are the water studies from all the private wells?

FEIR: There have been no documented releases of firefighting foam on Airport based on interviews with Airport managers going back 25 years. There are no airport firefighting foam (AFFF) products that will be used in conjunction with the proposed Projects. There is no AFFF stored on the Airport. The only time when firefighting foam products will be used by the local Fire Departments is during Emergencies.

- Isn't it true, that although the airport itself does not use PFAS products, the Plymouth Fire department is who will be responding to accidents at the airport does use then to fight fuel fires?
- Isn't it true, that jets carrying a lot more fuel would require the use of more firefighting foams that contain PFAS. As a result, putting our water supply at a higher risk of contamination?

DEIR - 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 (O3), carbon monoxide (CO), nitrogen dioxide (NO2), lead (Pb), particulate matter (PM) (PM10), fine particulate matter (PM2.5), and sulfur dioxide (SO2), 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:

- How is using an air quality analysis from 35 miles away relevant, ethical or legally ok to use to represent our backyards next to our airport that is situated in a heavily populated neighborhood that guesses how many operations our airport.
- Isn't it true, that that the airport actually records less than 50% of what they believe are their total estimated operations.
- Isn't it true that the airport is in the dark with the real number of operations conducted by all the training schools and the repetitive circling and touch and goes while flying over our back yards with their leaded fuel?
- Isn't it true that the biggest flight schools do not track touch & goes, they only track hours and not the location of their flight paths?

DEIR: 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:

- How can a 24-hour average be used for decibel levels when a majority of flights are between a 12-hour period?
- How is the study valid when the modeling does not account for the thousands of low flying training aircraft that is not counted or known?
- Can you publish what the noise levels are between 7:00 am and 7:00 pm when the majority of the operations are?

DEIR Soil:
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.

- Why isn't a base line study for actual and current soil contamination, especially around the homes that are continuously contaminated by the low flying training flights with leaded fuel conducted?
- When is the last time soil testing was done in the homes around the airport?

Outlook Example of 217 comment letters beginning with "We ask you to find that the Final Environmental Impact Report..."

Plymouth (MA) Airport Expansion: Ask the State to Reject the Environmental Study

From Kati Winchell <kati@stopprivatejetexpansion.org>
Date Mon 12/9/2024 4:16 PM
To Moreno, Nicholas (EEA) <Nicholas.Moreno@mass.gov>

Nicholas Moreno,

Dear Secretary Tepper,

We ask you to find that the Final Environmental Impact Report EEA 16692 does not comply with the Massachusetts Environmental Policy Act.

The No Build Alternative is the only alternative that will meet the standards of MEPA. The Airport has not used all feasible means 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.

The Damage to the Environment includes noise pollution, air pollution, greenhouse gas emissions, threats to our drinking water and impacts to wildlife and the people who visit Myles Standish State Forest.

Thank you.

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