



The Commonwealth of Massachusetts

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February 13, 2004

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

PROJECT NAME : Nantucket Memorial Airport Improvements
PROJECT MUNICIPALITY : Nantucket
PROJECT WATERSHED : Islands
EOEA NUMBER : 12299
PROJECT PROPONENT : Nantucket Airport Commission
DATE NOTICED IN MONITOR : November 26, 2003

As Secretary of Environmental Affairs, I hereby determine that the Draft Environmental Impact Report (Draft EIR) submitted on this project **adequately and properly complies** with the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00).

Standard and Purpose of MEPA Review

Section 11.08(8)(b) of the MEPA Regulations requires me to find a Draft EIR adequate even if certain aspects of the project or issues require additional technical or descriptive analysis, so long as I find that "the draft EIR is generally responsive to the requirements of 301 CMR 11.07 and the Scope." I have fully examined the record before me, including but not limited to the Scope issued; the Draft EIR filed in response; and the numerous comments entered into the record. While many of the comments have raised valid concerns, I find that the Draft EIR has addressed the issues within MEPA jurisdiction to a sufficient extent that the project may advance to the stage of a Final EIR. However, there are still outstanding issues within MEPA jurisdiction, as described below and in the comments received. The Final EIR should address these issues, and respond to the comments received that are within MEPA jurisdiction. The Final EIR should present additional narrative and technical analysis where necessary to respond to the substantive comments received.

Project Description and MEPA Jurisdiction

As described in the Draft EIR, the proposed project involves airside and landside project components to be developed at the Nantucket Memorial Airport on the Island of Nantucket to enhance its safety and efficiency, including installation of navigational aids, extension of a runway, and construction of a terminal building. The project specifically involves: the expansion of the passenger terminal, development of the Bunker Area, extension of Runway 15/33 by 500 feet, construction of a parallel taxiway for Runway 15/33, construction of angle taxiways and exits, construction of an ILS precision approach to Runway 6, construction of water rescue equipment shelter, construction of wash rack/de-icing facility, rehabilitation of runway 6/24, and overlaying taxiway "F".

The project is undergoing review and requires a mandatory EIR pursuant to Sections 11.03(1)(a) 2, 11.03 (2)(b)1 and 2 of the MEPA regulations, because the project results in the creation of more than 10 acres of new impervious surfaces, it involves the potential taking of rare species on a project site of two or more acres. The project will require a Conservation and Management Permit from the Massachusetts Natural Heritage and Endangered Species Program (NHESP). In addition, the project will require a 401 Water Quality Certification from the Department of Environmental Protection (DEP) and Coastal Zone Management Consistency Permit from the Massachusetts Coastal Zone Management Office (MCZM). Because the proponent is seeking financial assistance from the Commonwealth, MEPA jurisdiction extends to all aspects of the project that might result in adverse environmental impacts.

General

The Final EIR should include a copy of this certificate and a copy of each comment received. The proponent should circulate the Final EIR at a minimum to those parties submitting written comments on the Draft EIR, and to any state agency from which the proponent will seek permits.

Comments

The Final EIR should respond fully to the substantive comments received. The Final EIR should present additional technical analysis and/or narrative as necessary to respond to the concerns raised, not otherwise raised in this Certificate. The proponent should circulate a copy of the Final EIR to any party submitting written comments on the Draft EIR. The Final EIR should contain a copy of this Certificate and of each comment received.

Project Description

The Final EIR should expand on the project description included in the Draft EIR. The

Final EIR should present a full description of the project, which should include a clear description of the terminal improvements proposed and a specific description of the three Bunker Area alternative development concepts. I encourage the proponent to work directly with the Town on the design description. In April 2002 the Nantucket Town Meeting voted to restrict design of any new Airport Terminal only to improvements necessary for new airport security requirements and the improvement of office and baggage areas for current Airport operators.

Alternatives

The Final EIR should expand on the alternatives analysis included in the Draft EIR. A central purpose of MEPA review is to ensure that a project proponent studies feasible alternatives to a proposed project; fully discloses environmental impacts of a proposed project; and incorporates all feasible means to avoid, minimize, or mitigate Damage to the Environment as defined by the MEPA statute. After completion of the EIR process, the state permitting agencies must then issue substantive decisions on whether or not to permit those aspects of the project within their respective jurisdictions. If permits are issued, the state agencies must incorporate the information in the EIR process into their required Section 61 Findings, thus formalizing the mitigation commitments contained in the EIR.

Noise

The Final EIR should describe all measures that the airport is currently undertaking and will implement in the future to control noise levels at the airport. The Final EIR should also include: discussions of the data collected by noise monitoring, evaluations of the extent of compliance with the voluntary noise abatement procedures, historic data about noise complaints, projected noise levels using different potential future fleet mixes, a detailed discussion of what the FAA is studying about flight tracks at this airport and other New England airports referenced in the Draft EIR.

Traffic

In January 2001 the Nantucket Comprehensive Community Plan was ratified containing a range of recommendations aimed at reducing the environmental impacts of traffic. The Final EIR needs to thoroughly address each of the implementation measures described in the Plan.

Executive Order 385- Growth Management

The Draft EIR is limited in its discussion on the impact of growth in Airport arrivals and departures. The Final EIR should contain a thorough examination of the issue of growth and demand at the Nantucket Airport. This examination should include an evaluation of the experience of other destination airports. The Final EIR should also address the concerns raised about growth in comments received that are within MEPA jurisdiction.

Rare Species

The Natural Heritage and Endangered Species Program (NHESP) has determined that the presentation of rare species information, with one exception, is accurate and comprehensive. The proposed project will require a new conservation permit. The proponent should work with NHESP on drafting a conservation plan that results in a net benefit to the protected species that will be impacted by the proposed project. The Final EIR should provide a detailed description of conservation plan for the project site. The Final EIR should include the finalized provisions for rare species as determined by the NHESP, the detailed mitigation plans, description of benefits to the protected species and their habitats, timelines for implementation, and contingency plans should the approved approach fail. I encourage the proponent to consult with the NHESP, Mass Audubon, NAC and other conservation agencies.

Ground Water

The Final EIR should provide a detailed analysis, expanding on what is presented in the Draft EIR, demonstrating the impact of the proposed project's water withdrawal. This analysis should include future increased demands from the airport on Nantucket's water supply. The Final EIR should address what the storm water plans are in regards to the expansion of the airport to assure the protection of the Sole Source aquifer. In particular, it should examine what are the best management plans for the storm water for the future passenger terminal, future parking lot expansion and the bunker area. The Final EIR should also include a plan for the deicing and wash down facility that can be reviewed within the public process. In the Final EIR, the storm water should be analyzed for a minimum of total petroleum hydrocarbons and for the presence of deicing fluids. In addition, the annual groundwater monitoring should also include the testing for the deicing constituent polypropylene glycol to determine if it is present.

Wastewater/Water

The Town of Nantucket issued its "Comprehensive Wastewater Management Plan and Draft Environmental Impact Report Phase II – Alternatives and Site Identification, Nantucket, Massachusetts"(CWMP) in September, 2003. The CWMP raises the prospect of a major upgrade to the capacity of its main water treatment facility. The Final EIR should explain if the airport's plans for wastewater disposal are consistent with CWMP.

Air Quality

The Draft EIR does a good job focusing on the airport's landside and airside air quality analyses, which were conducted in accordance with applicable FAA and USEPA methodologies. DEP has indicated that it is satisfied with the air quality information presented in the Draft EIR. The airside analysis indicated that increases in VOCs and NOx from airport operations would be

at a "de minimus" level under federal air quality rules. The Final EIR should include firm commitments to the Transportation Demand Measures to mitigate the minor increases in emissions from landside activities.

Historic/Archaeological Resources

The entire island of Nantucket is designated as a National Historic Landmark. However, consultation with the Massachusetts Historical Commission (MHC) staff and review of the MHC files and site evaluations indicates that the site contains no individual historic resource listed in the Inventory of Historic and Archaeological Assets in the Commonwealth. The Draft EIR suggests that the proposed project at the airport will have a beneficial effect on historic resources, due to the reductions in noise and physical improvements to the terminal. The Final EIR should indicate the types of architectural elements that are planned for any structures, and/or commit to having MHC review building plans when they are completed.


Mitigation / Section 61 Findings

The Final EIR should contain a summary of all mitigation measures to which the proponent is committed, as well as Proposed Section 61 Findings for use by the state agencies. The Proposed Findings should reflect any new commitments made during the course of the Final EIR process.

I remind the proponent that if the project should change for any reason, the proponent should file a timely Notice of Project Change that fully explains any changes and their potential environmental impacts.

February 13, 2004

Date


Ellen Roy Herzfelder

Comments received:

12/23/03	U.S. Environmental Protection Agency
1/07/04	Cinda Gaynor
1/16/04	Department of Environmental Protection, SERO
1/28/03	George Hubbs
1/28/04	Nantucket Planning and Economic Commission
1/30/04	The Nantucket Civic League
1/30/04	Richard and Judy Carter

EOEA#12299

DEIR Certificate

02/13/04

2/02/04	Nantucket Sustainable Development Corporation
2/02/04	Nantucket Community Association
2/02/04	Mass Audubon
2/04/04	Division of Fisheries & Wildlife, Natural Heritage and Endangered Species Program
2/06/04	Nantucket Land Council

BAD/ACC/acc