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June 1, 2012

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Secretary Richard K. Sullivan  
Executive Office of Energy and Environmental Affairs  
Attention: MEPA Office  
Holly Johnson, EEA # 14642  
100 Cambridge Street, Suite 900  
Boston, MA 02114

**RE: Draft Environmental Impact Report  
Barnstable Municipal Airport Master Plan, Hyannis**

**Kristin Andres**

Dear Secretary Sullivan:

**Sandy Bayne**

**Michael Corrigan**

**Anne Ekstrom**

**Katherine Garofoli**

**Jean C. Mangiafico**

**Paula Miller**

**Jonathan Moore**

**Erica Parra**

**Mark H. Robinson**

**Janice Walford**

**Daniel Webb**

The Association to Preserve Cape Cod (APCC), the Cape's nonprofit environmental advocacy and education organization, submits the following comments regarding the Draft Environmental Impact Report (DEIR) for the Barnstable Municipal Airport Master Plan, EEA # 14642.

The Barnstable Municipal Airport Master Plan DEIR proposes improvements to the airport facilities that include:

- Construction of general aviation and corporate hangars or modification of existing facilities at the East Ramp for a combined footprint of 175,000 sq. ft.;
- Construction of an additional 35,000 sq. ft. of hangar space at the North Ramp;
- Expansion of the East Ramp apron;
- Expansion of the North Ramp apron;
- Reconstruction of Taxiway C; and
- Redevelopment and leasing of the site of the former Mildred's Restaurant.

The DEIR states that some of the plans are conceptual in nature, but are representative of the airport at future build out.

Due to the presence of Zone I and Zone II Wellhead Protection Areas supplying public water to the towns of Barnstable and Yarmouth, the airport site is designated as a Resource Protection Area (RPA) on the Regional Land Use Vision Map in the Cape Cod Regional Policy Plan (RPP). The airport

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property is also located within a Potential Water Supply Area, Freshwater Recharge Area, Marine Water Recharge Area for Lewis Bay, and a designated Water Quality Improvement Area. The property also contains sensitive wetland areas.

RPA's are defined in the RPP as areas where development is to be discouraged. Because of this, minimizing as much as possible the amount of additional land altered due to future airport development activity should be a goal in the Master Plan. Even more so, protection of this critical public water supply area should be the applicant's and regulatory agencies' most important priority in the planning and review of future airport development. The preferred alternative, as described in the DEIR, does minimize the disturbed area and avoids incursion into sensitive wetland or habitat areas. APCC commends the applicant for presenting a plan that avoids these sensitive areas. Still, the project will result in a net increase of approximately 24 acres of impervious surfaces within this water supply area. APCC encourages the applicant to seek opportunities for additional refinement of the project to further reduce impervious surfaces and therefore further minimize the potential for impacts to water resources.

#### Wastewater

According to the DEIR, the project will result in a net increase of 3,000 gallons per day of wastewater. The applicant proposes to connect new facilities built on the East Ramp to town sewer, and over time to remove septic systems currently servicing existing facilities and connect those facilities to town sewer as well. The DEIR states that the town of Barnstable has confirmed that there is sufficient capacity at the Barnstable wastewater treatment plant to accommodate the increased wastewater flow. APCC supports this proposal, which would reduce nutrient loading to the Lewis Bay watershed and to a public water supply well in close proximity.

#### Stormwater Management

The water quality of Lewis and Upper Gate ponds continues to remain a concern to APCC. Previous testing of the ponds has revealed elevated nutrient levels and the presence of metals and organic compounds in pond sediments, all of which has been linked to stormwater discharges into the ponds. Contaminants in the ponds could have a direct bearing on groundwater quality downgradient of the ponds and therefore impact the drinking water supply.

APCC is pleased that, as a condition of a Development of Regional Impact (DRI) approval for the Main Terminal project in 2007, 100 percent of stormwater is now pretreated prior to discharging to Lewis and Upper Gate ponds. This, in addition to other practices the airport has put in place, has led to improved water quality in the two ponds. However, contamination of the ponds' sediments persists. APCC looks forward to the completion of the Stage II Environmental Risk Assessment for determination whether remedial actions may be necessary to improve the health of the ponds to acceptable levels, including possible actions that may address the issue of sediment contamination. APCC is mindful of the risks described by Horsley Witten consultants in disturbing pond sediments and potentially releasing trapped contaminants.

Although APCC is encouraged by results of the most recent groundwater monitoring that reveal safe levels of contaminants of concern (COCs) for drinking water, continued monitoring is essential to ensure that safe drinking water standards are maintained.

### Runway Deicing

It is unclear from review of the DEIR whether the airport currently has, or has the potential to adopt in the future, a runway deicing program. If such a program exists or is a possibility, APCC would like additional information on the effectiveness of the existing stormwater management system in capturing and filtering out contaminants from runway deicing.

### Hazardous Materials and Hazardous Wastes

APCC notes that the airport has made a commitment to limit hazardous materials and hazardous wastes to the 154,253 gallons permitted in the 2007 DRI approval. More details should be provided regarding how the above-mentioned levels will be maintained as the airport facility moves toward build out.

### Trip Generation

According to the DEIR, the project will result in an additional 986 vehicle trips per day on regional and local roads. APCC anticipates the opportunity to review more information on a traffic analysis and proposed mitigation as the project moves under review by the Cape Cod Commission.

APCC looks to more detailed study of project proposals under the RPP regulatory process for assurances of appropriate mitigation for wastewater, stormwater management, storage and use of hazardous materials, greenhouse gas emissions, energy conservation and project trip generation.

APCC thanks the Secretary for this opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Keeran", with a long horizontal flourish extending to the right.

Don Keeran  
Assistant Director