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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : L.G. Hanscom Field North Airfield Development
PROJECT MUNICIPALITY : Bedford
PROJECT WATERSHED : Shawsheen River
EEA NUMBER : 16654
PROJECT PROPONENTS : Runway Realty Ventures, LLC and North Airfield Ventures, LLC
DATE NOTICED IN MONITOR : January 25, 2023

Pursuant to the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62L) and Section 11.06 of the MEPA Regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of a mandatory Draft Environmental Impact Report (DEIR).

I received over 350 comment letters from legislators, local officials, residents and community group expressing significant concerns about the project. Most commenters identify concerns that the project will increase the capacity of the Massachusetts Port Authority's (Massport's) L.G. Hanscom Field (Hanscom) to accommodate more flights. Commenters therefore indicate that, in contrast to the climate goals established by the Commonwealth and local communities, the project will lead to increased greenhouse gas (GHG) emissions rather than reduced emissions through the use of carbon-free or low carbon aviation technology, such as electric airplanes and Sustainable Aviation Fuel (SAF), or a reduction in the number of flights. Many commenters emphasized the potential environmental and public health impacts of increased Hanscom operations, which would affect residents, including residents within Environmental Justice (EJ) populations, historical and cultural resources, water supplies, wildlife habitat and recreational activities.

I note that many comments request that the project not be approved. MEPA is not a permitting process and I do not have the authority to approve or deny a project. The purpose of MEPA is to provide

meaningful opportunities for public review of the potential environmental impacts of projects for which Agency Action is required, and to assist each Agency in using (in addition to applying any other applicable statutory and regulatory standards and requirements) 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. MEPA requires project proponents to fully describe proposed activities, disclose their environmental and public health impacts, review alternatives and identify mitigation measures for unavoidable impacts.

Based on a review of the Environmental Notification Form (ENF), consultation with Agencies, and a review of comment letters, I have determined that the Proponent should prepare the DEIR in accordance with the Scope below.¹ The Scope incorporates many of the concerns identified in comment letters. The DEIR should provide a detailed project description and data and analyses that support the Proponent's assertion that the project will reduce the number of flights at Hanscom. The Scope requires additional analysis of the project's impacts with respect to air emissions, noise, land alteration, wildlife habitat, water quality and transportation, and requires an evaluation of climate risks affecting the project site. The DEIR should include copies of all comment letters submitted and detailed responses to comments.

Project Description

As described in the Environmental Notification Form (ENF), the project consists of the development of 495,470 square feet (sf) of aircraft hangar space, including construction of 27 aircraft hangars with a combined area of 408,360 sf and renovation of an existing 87,110-sf hangar building ("Navy Hangar"). The hangars will be designed with doors measuring 28 feet wide and at least 105 feet high. Each hangar will also include interior space for aviation support, passenger amenities and aircraft maintenance and repair. Vehicular access to the site will be provided at two existing entrances off Hartwell Road; the third existing curb cut will be eliminated. A perimeter vehicular roadway will be constructed around the east, north, west and southwest portions of the site to provide access to the hangars and to a total of 240 parking spaces in several lots across the site. A new connection between the site and Hanscom's Taxiway R will be constructed by the Proponent to provide access for aircraft between the site and the airport. As detailed below, the Proponent will lease a portion of the site and acquire two parcels from Massport to assemble the project site.

According to the ENF, providing aircraft parking and on-airport storage at Hanscom is consistent with Massport's long-term planning goal of relieving pressure from Logan Airport by using regional airports to satisfy the current and future demand for general aviation services. The project is asserted to meet demand for individual hangar space by existing users desiring permanent hangar space and Hanscom's three fixed base operators (FBOs) who are currently operating over capacity and have waiting lists for new customers seeking hangar space. Currently, aircraft operators who do not have hangar space at Hanscom must fly to Hanscom from their base of operations, pick up and drop off passengers, then fly back empty to the base location to park/store the aircraft until the next customer requires service; these extra flights between Hanscom and an off-site base location are known as "ferry flights." According to the ENF, the project will provide an environmental benefit by reducing the number of flights to and from Hanscom by providing on-site hangar space for aircraft that would

¹ The ENF referred to the two Proponents of the project (Runway Realty Ventures, LLC and North Airfield Ventures, LLC) as the "Proponent." This Certificate likewise uses the term Proponent to refer collectively to both project entities.

otherwise require the use of ferry flights to pick up and drop off passengers.

Environmental Status and Planning Report (ESPR)

The MEPA regulations (Section 11.06(2)) indicate that during the course of an ENF review I may review any relevant information from any other source to determine whether to require an EIR, and, if so, what to require in the Scope. To provide context for this project-specific review and because many issues raised by commenters relate to airport-wide operations and impacts, this Certificate refers to information included in Environmental Status and Planning Reports (ESPR) (EEA# 5484/8696) prepared by Massport for by MEPA and the public.

The MEPA environmental review process for Hanscom occurs on two levels: airport-wide and project-specific. Approximately every five years since 2000, Massport has prepared an ESPR, which provides a “big picture” analysis of the environmental impacts of current and anticipated levels of airport-wide activities (including aircraft operations and passenger activity), and presents comprehensive strategies to avoid, minimize and mitigate impacts. The ESPRs have provided analyses of environmental impacts associated with Hanscom Field activities and considered future conditions based on projected operations. The ESPRs have included important data on airport facility planning and environmental impacts, including key indicators of airport activity levels, the regional transportation system, ground access, noise, air quality, environmental management, and project mitigation tracking. As a result, the documents have served as planning tools to guide Massport in the development of policy and programs. Potential development of the North Airfield was previously identified as part of the long-range planning analysis included in each ESPR. Prior to preparing an ESPR, Massport submits a Proposed Scope for the ESPR for review by the MEPA Office, Agencies and the public. A Certificate is then issued formalizing the Scope for the next ESPR. Most recently, Massport submitted a Proposed Scope for the 2022 ESPR in October 22, 2022 and a Certificate on the Proposed Scope was issued on December 16, 2022. Massport anticipates that the 2022 ESPR will be completed this year and distributed for public review and comment.

Project Site

The 49.4-acre project site abuts the north side of Hanscom Field, a regional airport operated by Massport in Bedford, Concord, Lexington and Lincoln. The project site is located entirely within Bedford and consists of approximately 33.3 acres of land owned by the Massport and 16.1 acres owned by the Proponent. Massport owns approximately 29.5 acres on the western part of the site and a 3.8-acre area at the eastern end of the site. The Proponent owns the remaining 16.1-acre area (the Navy Hangar site), which was purchased from the U.S. General Services Administration (GSA) in 2019. Massport will lease the 28.1-acre area at the western part of the site (“lease area”) to the Proponent and convey to the Proponent a 1.4-acre parcel at the eastern end of the lease area and a 3.8-acre parcel adjacent to the eastern end of the Proponent’s property. The Proponent will convey a 2.6-acre area adjacent to Taxiway R to Massport. Upon completion of the land transfers, the Proponent will own 21.3 acres of land and lease 28.1 acres from Massport.

Massport-owned land at Hanscom is located west, south and east of the site. The project site is bordered by Hartwell Road and commercial land uses to the north. A residential neighborhood on Hartwell Road is located approximately 1,000 feet northeast of the site. The site is flat near the airfield

and slopes up to Hartwell Road. The western part of the site owned by Massport was formerly used as a trailer park which was used to provide supplemental housing for the Hanscom Air Force base and is now largely undeveloped and wooded. The central portion of the site includes the Navy Hangar building and is largely paved. The eastern part of the site is vegetated and undeveloped.

Most of the project site is located within the Zone II wellhead protection area associated with the Town of Bedford's drinking water supply wells. The site is located adjacent to mapped Priority Habitat at Hanscom; as stated in the Scope, the DEIR should confirm whether Priority Habitat extends onto the project site and whether any activities are proposed within rare species habitat. According to the Federal Emergency Management Agency's (FEMA's) National Flood Hazard Layer, the site is not within the 100- or 500-year floodplain. According to data available from MassGIS, the site does not contain wetlands, vernal pools, or prime forestland and is not within any surface water protection areas. According to the Massachusetts Historical Commission (MHC), the site is in an area considered to be archaeologically sensitive due to the proximity of known historic period and ancient Native American archaeological sites; in addition, it is in proximity to the Minute Man National Historical Park, which is a National Historic Landmark and listed in the National Register of Historic Places

The project site is within an Environmental Justice (EJ) population (census blocks)² designated as Minority. There are no additional EJ populations within the one-mile Designated Geographic Area (DGA) around the site. The project site is within five miles of 35 additional EJ populations designated as Minority located in Billerica, Burlington, Lexington and Waltham.

Environmental Impacts and Mitigation

Potential environmental impacts of the project include alteration of 23.2 acres of land; the addition of 23.9 acres of impervious area; generation of 194 average daily (non-aircraft) vehicular trips (adt); use of 135200 gallons per day (gpd) of water; and generation of 12,150 gpd of wastewater. Greenhouse Gas (GHG) emissions and other air pollutants are associated with on-site energy use and transportation, as well as aircraft activity. Construction and operation of the project will generate noise and air emissions, including Greenhouse Gas (GHG) emissions associated with on-site energy use and transportation.

According to the ENF, the project will reduce the overall number of aircraft flights and result in an environmental benefit associated with reduced air emissions; as detailed below, the DEIR should provide documentation in support of this benefit. Measures to avoid, minimize, and mitigate environmental impacts include construction of energy-efficient buildings with enhanced electrical infrastructure to support electric vehicles and future aircraft electrification initiatives and construction of a stormwater management system consistent with the Massachusetts Stormwater Management Standards (SMS). The DEIR should contain a comprehensive discussion of measures to be taken by the project to avoid, minimize and mitigate environmental impacts.

Jurisdiction and Permitting

The project is undergoing MEPA review and is subject to preparation of a mandatory EIR

² "Environmental Justice Population" is defined in M.G.L. c. 30, § 62 under four categories: Minority, Income, English Isolation, and a combined category of Minority and Income.

pursuant to Section 11.03(1)(a)(2) of the MEPA regulations because it requires an Agency Action and will create ten or more acres of impervious area. The project is also required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a DGA (1 miles) around one or more EJ Populations. The project exceeds ENF thresholds at 301 CMR 11.03(1)(b)(1) (direct alteration of 25 or more acres of land) and 301 CMR 11.03(1)(b)(2) (creation of five or more acres of impervious area). The project is subject to the MEPA GHG Emissions Policy and Protocol.

The project requires an Order of Conditions (OOC) from the Bedford Conservation pursuant to the Town's Wetlands Bylaw and approvals from other Town of Bedford agencies.³ It requires approval by the Federal Aviation Administration (FAA) and a National Pollutant Discharge Elimination System Construction General Permit (NPDES CGP) from the Environmental Protection Agency (EPA).

The project involves Land Transfers, in the form of a lease and land disposition, from Massport to the Proponent. The Land Transfers involve a majority of the project site, and will facilitate development of a common and integrated development plan across the entire site. Therefore, MEPA jurisdiction is broad and extends to those aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

Review of the ENF

The ENF included a brief description of existing and proposed conditions, preliminary project plans, and an alternatives analysis, and identified measures to avoid, minimize and mitigate environmental impacts. Consistent with the MEPA Interim Protocol on Climate Change Adaptation and Resiliency, the ENF contained an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool"),⁴ together with information on climate resilience strategies to be undertaken by the project. The DEIR should provide a detailed description of the project's operations and anticipated reduction in the number of ferry flights, and a thorough analysis of the project's impacts and mitigation measures, as set forth in the Scope below.

SCOPE

General

The DEIR should follow Section 11.07 of the MEPA regulations for outline and content and provide the information and analyses required in this Scope. It should demonstrate that the Proponent will pursue all feasible measures to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible.

Project Description and Permitting

³ Local approvals are required for the project activities on the Navy Hangar parcel only because Massport is exempt from local regulation.

⁴ https://resilientma.org/rmat_home/designstandards/

Conceptual plans should be provided at a legible scale and clearly identify open space, buildings, roadways, impervious areas, stormwater and utility infrastructure and easements. The DEIR should identify and describe state, federal and local permitting and review requirements, provide an update on the status of each of these pending actions, analyze applicable statutory and regulatory standards and requirements, and provide a discussion of the project's consistency with those standards; in particular, the DEIR should review FAA permitting requirements and the status of the project's review under the National Environmental Policy Act (NEPA).

The DEIR should include updated site plans for existing and post-development conditions at a legible scale and a detailed description of all project components, including buildings, accessory structures such as fueling tanks, impervious areas, stormwater and utility infrastructure and transportation improvements. The DEIR should provide detailed plans, sections, and elevations to accurately depict existing and proposed conditions, including rare species habitat, wetlands and floodplains (including wetlands subject to regulation under the Town's Wetlands Bylaw), easements and site topography. It should provide updated calculations of the impacts of the project in a tabular format. The DEIR should identify, describe, and assess the environmental impacts of any changes in the project that have occurred between the preparation of the ENF and DEIR.

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

Activity Levels and Ferry Flights

The DEIR should provide an expanded project description that more clearly describes all project components. It should clearly state whether the project will facilitate and accommodate an anticipated increase in flight activity at Hanscom, or whether it is intended to absorb existing demand. If the former, the DEIR should describe the extent to which the project will expand capacity of the airport to accommodate future growth, including through the number and design of hangar spaces, or, alternatively, whether the demand is anticipated to grow independent of the project. To the extent this project will lead to a net increase in flight activity, this should be accounted for by Massport in future ESPRs. The DEIR should review the detailed information on current and future activity levels at Hanscom included in the ESPR and discuss how the project may affect future activity levels.

A key rationale for the Preferred Alternative is that it will provide an environmental benefit by reducing the overall number of flights and associated air emissions; the ENF asserted that this would result because the project provides hangar spaces for planes that would otherwise generate ferry flights. Many commenters questioned whether the project will reduce impacts associated with existing flights or whether it will result in more flights and increased air emissions and noise levels. The DEIR should describe in greater detail how the project will meet the objective of meeting the demand for hangar spaces while also reducing impacts. Specifically, the DEIR should describe the number and type of aircraft to be stored in the hangers and provide a comprehensive explanation of ferry flights, estimate the

number of ferry flights that are anticipated under existing and future conditions with explanation of how the estimates were generated, explain how the project concludes that ferry flights would necessarily occur in the absence of hangar spaces (e.g., as opposed to aircrafts departing to serve additional customers instead of seeking parking spaces at another base location), and discuss why expanding hangar capacity to meet potential future increases in customer demand would not result in a net increase in flights as compared to existing conditions, even when accounting for a reduction in ferry flights.

Due to the uniqueness of this analysis, the Proponent should consult with Massport regarding the appropriate data and methodology that should be used to estimate the number of flights (including ferry flights) and activity levels, under existing and proposed conditions. The DEIR should fully document and explain not only the conclusions of the analysis, but also the data, assumptions and methodologies used. The Proponent should review comment letters which recommend specific data that should be provided to support the project's environmental benefits. To the extent any recommended data sources or analysis identified below and in comment letters are not addressed in the DEIR, the DEIR should provide an explanation of why the information was not incorporated, including if data are not available and/or cannot be reasonably collected, are not pertinent to the analysis, or would not yield informative results. The analysis should address the items listed below, in addition to factors recommended by commenters and by Massport:

- The number and frequency of ferry flights under existing and proposed conditions
- The proportion of overall flights documented in the 2017 ESPR (or 2022 ESPR, if available) that are composed of ferry flights, and trends in the number of ferry flights over time
- Characterization of ferry flights, including types of aircraft, distances flown to pick up and drop off passengers, operation of the aircraft (privately owned, fractionally owned, charter, FBO, and other relevant categories)
- Demonstration that the proposed hangars are designed to accommodate the number and type of aircraft responsible for ferry flights
- GHG emissions associated with ferry flights and anticipated reduction in emissions resulting from the project
- Discussion of why the existing hangar space at Hanscom, including space recently constructed or currently under construction, and any planned or proposed increase in hangar space, does not or will not reduce ferry flights
- Estimate of additional flights that would be accommodated by the project that are not ferry flights
- Review projections of future aircraft activity in the ESPR and compare projected increase/decreases in air emissions and noise associated with the project to those estimated in the ESPR

Alternatives Analysis

The ENF included an alternatives analysis which evaluated No Build and Build Alternatives and compared the impacts of these alternatives to those of the Preferred Alternative. The No Build Alternative represents existing conditions and provides a baseline from which the build alternatives can be evaluated. According to the ENF, the Navy Hangar is not usable in its current condition; however, existing paved areas could be used for surface vehicle parking and storage. Because the Preferred Alternative is asserted to have an environmental benefit associated with its reduction in ferry flights, the

DEIR should provide a supplemental description of the No Build Alternative based on current and projected operations at Hanscom using data available in the 2017 ESPR, or, if available, the 20232 ESPR.

The ENF described an alternative development plan for the site involving a mix of hangar space and commercial uses; this alternative was designated as the “Build Alternative” in the ENF but is referred to in this Certificate as the Mixed-Use Alternative. The Mixed-Use Alternative would include the development of up to 165,000 sf of hangar space, including office and support space, on the western Massport-owned part of the site and construction of a 78,700-sf building with laboratory space and renovation of the Navy Hangar building for use as a warehouse on the Navy Hangar site. The hangar development included in the Mixed-Use Alternative was described in the 2017 ESPR and proposed by Massport in an Environmental Assessment (EA) evaluated pursuant to the National Environmental Policy Act (NEPA) in 2018. Additional paved areas would be constructed to provide vehicular parking for a total of 580 vehicles, aircraft apron space and a connection to Taxiway R. The Build Alternative would add 5.4 acres of impervious area, generate 1,916 adt, use 16,300 gpd of water and generate 14,800 gpd of wastewater. Compared to the Preferred Alternative, the Build Alternative would add 18.5 fewer acres of impervious area, generate 1,722 more adt, add 340 more parking spaces, use 2,800 gpd more water and generate 2,650 gpd more wastewater. According to the ENF, the Build Alternative was deemed to be economically infeasible because the low density of hangar space would not support the cost of providing the necessary infrastructure. In addition, the Build Alternative does not meet the project purpose, which is to meet the anticipated future demand for additional hangar space consistent with Massport’s objective of reducing demand at Logan Airport. For this reason, the Mixed-Use Alternative was dismissed in favor of the Preferred Alternative.

According to the ENF, the Preferred Alternative will provide sufficient hangar space to meet demand and reduce the number of ferry flights. The hangars will be constructed to be energy efficient, will include rooftop solar photovoltaic (PV) generating systems and will be designed to orient the activities at the site in a manner to minimize visual and noise impacts. As indicated in the Scope, the DEIR should include a more detailed description of the project and its anticipated environmental benefits and impacts.

The DEIR should provide an expanded alternatives analysis. The DEIR should provide a supplemental description of the No Build Alternative using the data on environmental trends available in the 2017 ESPR (or 2022 ESPR, if available) to reflect conditions without the construction and operation of the Preferred Alternative, including the reduction in Hanscom flights which the Proponent asserts will result from the project.

The DEIR should review a reduced build alternative that achieves the goals of reducing the number of ferry flights by constructing fewer hangars and thereby minimizing land alteration. It should review alternatives consisting of operational measures that could be implemented to reduce ferry flights without additional hangars; potential operational measures that should be reviewed include disincentives or penalties for operators conducting ferry flights; restrictions on the number or types of aircraft used for ferry flights; use of ground transport, such as shuttle buses, to transport passengers between Hanscom and the location where the aircraft are stored; or incentives for ferry flights that pick up multiple passengers or use SAF. The DEIR should evaluate measures analogous to transportation demand management (TDM) programs used to minimize single-occupancy vehicle trips, such as ride sharing and

ride matching services. The DEIR should estimate the associated reduction in emissions from the reduced build and operational alternatives, as compared to the Preferred Alternative.

The DEIR should review an alternative involving phased construction of the proposed hangars, with the later phases of construction being contingent upon the widespread availability of SAF or electric planes. It should also review the feasibility of constructing later phases of the project upon a clear demonstration that the project achieves its goal of reducing ferry flights.

Comment letters suggest that the use of hangar spaces by private jets will serve to increase emissions, and suggest that the Proponents and Massport could mandate that any and all hangars within the development house only fossil fuel-free aircraft. The DEIR should discuss the feasibility of this alternative, and describe any other alternatives that could maximize the use of sustainable aviation fuels by future users of the hangars. The DEIR should discuss how the Preferred Alternative is consistent with Massport's "Net Zero" planning and the Commonwealth's emissions reduction goals.

Environmental Justice

As noted above, the project site is located within an EJ population designated as Minority. According to the Proponent, the only identified EJ population within the DGA is located entirely within the Hanscom Air Force Base; however, according to the ENF, there are no housing units on the Air Force Base within the census block group containing the EJ population. Within the census tract containing the above EJ population, no languages are identified as those spoken by 5% of more of residents who also identify as not speaking English very well. As noted, the project site is within five miles of 35 additional EJ populations designated as Minority located in Billerica, Burlington, Lexington and Waltham.

Effective January 1, 2022, all new projects in DGAs as defined in 301 CMR 11.02, as amended around EJ populations are subject to new requirements imposed by Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy* ("Climate Roadmap Act") and amended MEPA regulations at 301 CMR 11.00. Two related MEPA protocols – the MEPA Public Involvement Protocol for Environmental Justice Populations ("MEPA EJ Public Involvement Protocol") and MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations ("MEPA Interim Protocol for Analysis of EJ Impacts") – are also in effect for new projects filed on or after January 1, 2022. Under the new regulations and protocols, all projects located in a DGA around one or more EJ populations must take steps to enhance public involvement opportunities for EJ populations, and must submit analysis of impacts to such EJ populations in the form of an EIR.

Community Engagement

Consistent with the MEPA Public Involvement Protocol for Environmental Justice Populations ("MEPA EJ Public Involvement Protocol"), the Proponent sent advance notification of the project in the form of an EJ Screening Form to a "EJ Reference List" provided by the MEPA Office and consisting of Community Based Organizations (CBOs) and tribes/indigenous organizations. According to the Proponent, direct outreach to any residents within the EJ population would be difficult because the Air Force Base is not accessible for security reasons. The notice of the MEPA in-person site visit and remote consultation session was distributed to the EJ Reference List. The site visit was held at 3:00 PM on

February 6, 2023 and was attended by approximately 50 people. The remote consultation session was held at 6:30 PM on February 6, 2023 and was attended by approximately 150 people. A recording of the remote consultation session was posted by the Proponent at <https://vimeo.com/800998336>, and is anticipated to be available through the Town of Bedford website. Prior to filing the ENF, the Proponent made a project presentation at a meeting of the Hanscom Field Advisory Commission (HFAC) on June 22, 2021 and provided updates at subsequent monthly meetings of the HFAC. In addition, the Proponent held an informational meeting with representatives of the Town of Bedford on December 12, 2022.

The ENF described a public engagement plan that the Proponents intend to follow for the remainder of the MEPA review process. The plan was limited to distributing electronic copies of the ENF to the EJ Reference List, making a copy of the ENF available at the Bedford Public Library and disseminating notice of the MEPA site visit and consultation session (which was already conducted). According to the ENF, the Proponent will continue to participate in public meetings and engage with the Town of Bedford and, to the extent practicable, with residents in the EJ population as the project advances through the MEPA process.

The DEIR should include a separate section on “Environmental Justice,” and contain a supplemental description of measures the Proponent intends to undertake to promote public involvement by EJ populations during the remainder of the MEPA review process, including a discussion of any of the best practices listed in the MEPA EJ Public Involvement Protocol that the project intends to employ. While outreach to the single mapped EJ population within the DGA appears difficult, I note that the project is surrounded by multiple EJ populations within five miles of the site. Given the dispersed nature of air emissions associated with aircraft activity, the Proponents are advised to conduct broader outreach to areas within the five-mile radius that may be particularly impacted by aircraft routes or flight patterns. To the extent commenters or other members of the public who have expressed interest in the project have indicated an association with EJ neighborhoods, the Proponents should broaden outreach efforts to those particular neighborhoods. The DEIR, or a summary thereof with translations, should be distributed to the EJ Reference List that was used to provide notice of the ENF, and the Proponent should obtain a revised EJ Reference List from the MEPA Office to ensure that contact information is updated. The DEIR should report on the outcome of any targeted outreach conducted to EJ neighborhoods, including any changes to project design that may be made in response to community concerns.

I encourage the Proponent to request an extended comment period for the DEIR to facilitate its review by the public and by local, state and federal agencies and to hold at least one public informational meeting prior to filing the DEIR. Because of its importance in demonstrating the project’s environmental benefits, I recommend that the Proponent present the methodology and preliminary findings of the analysis of ferry flights described above at a public meeting and revise or supplement the analysis, if necessary, in response to community input prior to filing the DEIR.

Baseline Health Assessment

The ENF included a baseline assessment of any existing “unfair or inequitable Environmental Burden and related public health consequences” impacting the EJ Population in accordance with 301 CMR 11.07(6)(n)(1) and the MEPA Interim Protocol for Analysis of EJ Impacts. The baseline assessment included a review of the data provided by the Department of Public Health (DPH) EJ Tool applicable to the DGA regarding “vulnerable health EJ criteria”; this term is defined in the DPH EJ Tool

to include any one of four environmentally related health indicators that are measured to be 110% above statewide rates based on a five-year rolling average. According to the ENF, the data surveyed indicate that neither the census tract containing the single identified EJ population nor the Town of Bedford exceed any of the four vulnerable health EJ criteria, which include Childhood Lead Exposure, Childhood Asthma Emergency Department Visits, Low Birth Weight and Heart Attack Hospitalizations. Areas of Lexington and Concord are also located within the one-mile radius of the site; however, as noted, the only mapped EJ population within the DGA is located within the Hanscom Air Force in Bedford and not in any of the surrounding towns; neither Lexington nor Concord meet any vulnerable health EJ criteria.

The ENF indicated that the following sources of potential pollution exist within the DGA, based on data available in the DPH EJ Tool:

- Major air and waste facilities: 1
- M.G.L. c. 21E sites: 5
- “Tier II” toxics use reporting facilities: 8
- Sites with Activity and Use Limitations (AULs): 3
- Underground storage tanks (USTs): 8
- EPA facilities: 2
- MBTA bus and rapid transit: 6 bus stops
- Other transportation infrastructure: 1 (Hanscom)

Although not required by the MEPA Interim Protocol for Analysis of EJ Impacts, the ENF surveyed environmental indicators tracked through the U.S. EPA’s “EJ Screen,” which compares the indicators by U.S. census block to MA statewide averages. The EJ Screen Tool reports on the following indicators:

- The National Air Toxics Assessment (NATA) indicators related to air toxics, including lifetime cancer risk from exposure to air toxics, hazard index for respiratory effects and diesel particulate matter concentration;
- Emissions of particulate matter (PM2.5) from power plants, industrial facilities and other sources;
- Ozone concentration in air, which is a primary constituent of smog;
- Percentage of occupied housing units built before 1960, which are likely to contain lead-based paint hazards that may contribute to elevated blood lead levels in children;
- Proximity to high volumes of traffic and associated increased exposure to ambient noise, toxic gases and particulate matter;
- Wastewater discharges to streams that increase potential exposure to pollutants;
- Proximity to National Priorities List (NPL) hazardous waste sites;
- Proximity to hazardous waste treatment, storage or disposal facilities (TSDFs); and,
- Proximity to facilities required to prepare Risk Management Plans (RMPs) because the use toxic, flammable or explosive substances.

According to the EJ Screen results, Proximity to NPL sites is the only indicator which exceeds the 80th percentile within the DGA.

According to the output report from the MA Resilience Design Tool included in the ENF, the project site has a high exposure to urban flooding due to extreme precipitation and to extreme heat. EJ populations within the DGA are likely also exposed to these climate risks. The DEIR should discuss climate resiliency measures to be employed by the project, consistent with the Climate Change scope below.

While the above indicators do not appear to show substantially elevated public health risks in the immediate vicinity of the site, as noted, the dispersed nature of air emissions could have effects over a broader radius around the project site. Several commenters have questioned the assertion in the ENF that an expansion in hangar capacity at the site could have the effect of reducing emissions and other impacts. As described in the Air Quality scope below, the DEIR should provide a comprehensive assessment of the air emissions impacts of the project, including from any increased activity levels and reductions in ferry flights resulting from the project. The data and methodologies used to calculate emissions should be fully explained. The DEIR should discuss whether current and future flight patterns associated with the hangar expansion are anticipated to disproportionately affect any particular neighborhoods, including EJ populations, within a five-mile radius around the site.

Public Health

The DEIR should include a separate section on “Public Health,” and discuss any known or reasonably foreseeable public health consequences that may result from the environmental impacts of the project. Publicly available data, including through the DPH EJ Tool, should be surveyed to assess the public health conditions in the immediate vicinity of the project site, in accordance with 301 CMR 11.07(6)(g)10. Any project impacts that could materially exacerbate such conditions should be analyzed. To the extent any required Permits for the project contain performance standards intended to protect public health, the DEIR should contain specific discussion of such standards and how the project intends to meet or exceed them.

Land Alteration

The DEIR should include a detailed plan showing pre- and post-construction site grades and provide a cut and fill plan and table. The cut and fill plan should be provided with and without the project layout (including buildings, aprons, roadways and parking areas) superimposed on the plan. The DEIR should provide an updated estimate of the proposed area of land alteration. It should cumulatively and separately quantify the total amount of alteration and fill associated with each hangar building, aprons, roadways and vehicular parking lots.

The DEIR should characterize the land cover in the western part of the site. The forested portion of the site should be described with respect to species composition, and approximate age, size and density. The DEIR should include site plans that clearly locate and delineate areas proposed for development and areas to be left undisturbed. It should describe how the project will be designed to avoid and minimize land alteration when fully built and during each stage of the construction period.

Stormwater Management

The project will add 36.75 acres of impervious area. According to the ENF, the stormwater management system will be constructed to comply with the SMS, including requirements for maintaining pre-construction peak runoff rates and volumes and removing at least 80 percent of Total Suspended Solids (TSS) from stormwater. The stormwater management system will include Best Management Practices (BMPs) such as above- and below-ground detention/infiltration systems, bioretention areas, structural systems and pervious pavement, where feasible.

The DEIR should describe the proposed stormwater management system and provide an analysis to demonstrate how it will be designed to satisfy all standards of the SMS and any additional requirements of the Town's Stormwater Bylaw and Regulation. It should confirm that the stormwater management system will meet additional requirements for stormwater discharges within a Zone II wellhead protection area and, if applicable, for land uses with higher potential pollutant loads. The DEIR should include detailed plans at a readable scale of the proposed drainage system and provide calculations of water quality volume, infiltration volume, total suspended solids removal, and peak rates of runoff for predevelopment and post-development site. Given the significant amount of impervious area to be added to the project site, the DEIR should include an evaluation of measures that exceed the SMS by incorporating low impact design (LID) strategies and green infrastructure wherever practicable. Green infrastructure is an effective way to treat stormwater generated by impervious surfaces and provide cooling and other benefits for the community and should be extensively incorporated into the warehouse building, parking lots, and other paved areas to the maximum extent possible. The DEIR should demonstrate that LID designs have been considered to the maximum extent practicable. The DEIR should provide analysis of the capacity of the stormwater management system under future climate conditions, as described below.

Traffic and Transportation

According to the ENF, the project will generate 194 adt by vehicles on area roadways. The trip generation estimate is based on trip rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual* using Land Use Code (LUC) 022 (General Aviation Airport). According to the ENF, the estimate of daily vehicle trips is based in part on the assumption that the facility will be staffed by 13 employees. The estimated number of vehicle trips generated by the project is well below the minimum MEPA review threshold for trip generation, which is 1,000 adt (in combination with construction of 150 or more New parking spaces). However, the project includes the construction of a total of 240 parking spaces. While the ENF indicated that the proposed number of parking spaces is needed because vehicles may be parked on the site for more than one day, it would appear that the Proponent anticipates a significant number of non-employee trips to and from the site.

The DEIR should include an analysis in support of the project's trip generation and parking supply as proposed in the ENF. It should describe the staffing levels needed to operate 27 hangars and any fluctuations in the number of staff. The DEIR should identify the type and number of non-employee trips and describe the travel patterns (e.g., peak or non-peak hour trips, weekday or weekend, etc), and provide a rationale for the large parking supply proposed in the ENF. It should describe the anticipated frequency of truck trips to the site during operation of the facility and likely travel routes, and estimate changes in traffic volumes on roadways adjacent to and within the Minute Man National Historical Park,

Great Meadows National Wildlife Refuge and residential neighborhoods. The DEIR should review the feasibility of using only one curb cut to access Hartwell Road, and describe any roadway changes that may be necessary to accommodate project-generated traffic. It should review potential transportation demand management (TDM) measures that will be implemented to minimize vehicular trips to and from the site. Alternatively, the Proponent may provide in the DEIR a full transportation analysis prepared consistent with the *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014 by EEA and the Massachusetts Department of Transportation; according to the Town of Bedford, the Proponent may be required to prepare such an analysis in connection with the Town's permitting process.

The DEIR should describe construction-period traffic, including the anticipated number of construction vehicles and truck routes. According to the ENF, the Proponent is exploring the feasibility of using the airfield to accommodate construction vehicle traffic in order to avoid the use of residential streets. The DEIR should review the feasibility of establishing a construction vehicle route using the airfield in light of security and safety requirements for operation of the airport. It should clarify whether the route would also be used to deliver supplies, such as fuel, to the project site when the facility is in operation. It should describe any additional construction activities that would be required to implement a construction route through the airfield and associated impacts, including land alteration, addition of impervious area, disturbance of rare species habitat or wetlands and identify potential mitigation measures, such as additional stormwater management systems.

Rare Species

Most of Hanscom is located within Priority Habitat of rare species mapped by the Natural Heritage and Endangered Species Program. According to the ENF, the project will not disturb any rare species habitat. The DEIR should provide a map of adequate scale to confirm if the project site contains any mapped Priority Habitat. If rare species habitat is located on the project site, the DEIR should review any potential impacts associated with the project and whether any mitigation measures or permitting pursuant to the Massachusetts Endangered Species Act (MESA) is needed.

Water and Wastewater

The project will use 13,500 gpd of water and generate 12,150 gpd of wastewater. According to the ENF, the water and sewer services will be provided by connections to the Town of Bedford's water and sewer mains in Hartwell Avenue. The Proponent anticipates that a sewer pump station and force main will be required to convey wastewater from the site to the Town's wastewater system.

The ENF should describe proposed activities requiring the use of water and provide a basis for the proposed volumes of water usage and wastewater generation. To the extent that water will be used to wash aircraft or may come into contact with solvents, fuels or other potential contaminants, the DEIR should describe how wastewater generated by these activities will be captured, contained and/or treated prior to discharge into the Town's sewer system. The DEIR should review any permit requirements that may be imposed by the Massachusetts Water Resources Authority (MWRA) through its Toxic Reduction and Control (TRAC) program or the Town, including Inflow and Infiltration (I/I) mitigation. According to comments provided by the Town of Bedford, analyses of the capacity of the Town's water and sewer infrastructure in the area should be conducted to determine if any system improvements are

needed to accommodate the project. The DEIR should review opportunities for minimizing water use, such as rainwater harvesting or reuse of greywater.

The project site is located within a Zone II wellhead protection area associated with the Town's Shawsheen water supply wells, which are not used due to concentrations of per- and polyfluoroalkyl substances (PFAS). As detailed below, the site is part of a designated Superfund site that continues to be evaluated by the Navy, Air Force, EPA and MassDEP. The DEIR should describe any use limitations applicable to the site based on its location within a Zone II and how the project will be designed to comply with the Drinking Water Regulations (310 CMR 22.00), including requirements for groundwater supply protection. The DEIR should describe any proposed fuel storage tanks at the site, identify their location and describe any containment measures to capture leaks or spills. As discussed below, the design of any spill containment measures should include the capacity to capture releases of fuel that may occur during intense precipitation events under projected climate conditions.

Noise

The DEIR should include an analysis of noise produced by operation of the facility, including aircraft moving around the site and idling, interior and exterior noise associated with maintenance, repair and starting of aircraft and other noise-producing activities. The analysis should compare existing noise levels at the site and surrounding receptors, including residential uses, to modeled sound levels under proposed conditions. The results of the analysis should be evaluated against standards adopted by MassDEP's Noise Policy, the Town and FAA guidelines. It should review potential noise mitigation measures, such as orientation of buildings, hours of operation, closure of hangar doors, use of ground power units (GPUs) and noise walls. Based on modeled noise levels developed by Massport for the 2017 (or, if available, the 2022 ESPR under development), the DEIR should evaluate potential changes in noise levels associated with reductions in ferry flights.

Air Quality

The DEIR should provide an air quality analysis consistent with the analyses presented in the ESPR. It should evaluate air emissions from aircraft take-offs, landings, cruising, taxiing and idling. The DEIR should provide estimates of project-generated emissions, or reductions in emissions from Hanscom operations gained through the elimination of ferry flights, for the following pollutants:

- Carbon Monoxide (CO)
- Oxides of Nitrogen (NO_x)
- Volatile Organic Compounds (VOCs)
- Particulate matter (PM₁₀ and PM_{2.5})
- Carbon dioxide (CO₂) and other Greenhouse Gasses (GHG)
- Diesel PM
- Lead (Pb)

The DEIR should describe how air emissions were modeled and discuss whether emissions are anticipated to meet the National Ambient Air Quality Standards (NAAQS). It should specifically review emissions from aircraft while they are on the project site and review potential impacts on nearby receptors. The DEIR should describe all mitigation measures implemented to minimize emissions of air

pollutants, including the use of on-site auxiliary power units (APU)/ground support equipment (GSE) and the Proponent's participation in enterprise-level initiatives at Hanscom related to GHG emissions reductions to support the Commonwealth's 2050 "net zero" goals. The DEIR should include a review of the development of technologies to reduce emissions from aircraft, such as electric engines and alternative fuels.

Climate Change

Adaptation and Resiliency

Based on the MA Resilience Design Tool output report attached to the ENF, the project has a "High" exposure rating based on the project's location for urban flooding associated with extreme precipitation and extreme heat. Based on the 40-year useful life identified for the hangars, the MA Resilience Design Tool recommends a planning horizon of 2070 and a return period associated with a 25-year (four percent chance) storm event when designing for extreme precipitation and the 90th heat percentile when planning for extreme heat conditions. Based on the 20-year useful life identified for the aircraft aprons/ramps, the MA Resilience Design Tool recommends a planning horizon of 2050 and a return period associated with a 25-year (four percent chance) storm event when designing for extreme precipitation and the 50th heat percentile when planning for extreme heat conditions.

According to the ENF, the design of the project will be evaluated based on the 2070 25-year storm event as recommended by the MA Resilience Design Tool, which estimates a total 24-hour precipitation depth of 8.4 inches for a 2070 25-year storm event. To the extent the site is anticipated to experience urban flooding, the first floor of the buildings will be elevated and/or floodproofed in accordance with Massport's Floodproofing Design Guide. According to the ENF, the stormwater management system will be sized to accommodate future precipitation events; the DEIR should confirm that the stormwater management system will be designed to accommodate a 2070 25-year storm event or greater. The project will add a significant area of pavement and other impervious surfaces which could increase urban heat island effect. According to the ENF, the roofs of the hangars will be constructed of high albedo materials that will reflect sunlight rather than absorb it. High albedo paving materials will also be used in on-apron areas.

The DEIR should identify opportunities to increase resilience through enhancement of the site, including retention of mature trees on-site, increased open space and permeable surfaces. It should review strategies to adapt to extreme heat conditions and drought conditions throughout the useful life of the project. The DEIR should document all efforts taken to maximize the use of low impact design (LID) strategies for stormwater management, including rain gardens, bioretention areas, tree box filters, water quality swales, and green roofs. It should review the project's consistency with Massport's climate resiliency planning efforts and any design guidelines.

Greenhouse Gas (GHG) Emissions

This project is subject to review under the May 5, 2010 MEPA GHG Policy. The Policy requires Proponents to quantify carbon dioxide (CO₂) emissions and identify measures to avoid, minimize or mitigate such emissions. The analysis should quantify the direct and indirect CO₂ emissions of the project's energy use (stationary sources) and transportation-related emissions (mobile sources). Direct

emissions include on-site stationary sources, which typically emit GHGs by burning fossil fuel for heat, hot water, steam and other processes. Indirect emissions result from the consumption of energy, such as electricity, that is generated off-site by burning of fossil fuels, and from emissions from vehicles used by residents, employees, vendors, customers and others.

Stationary Sources

The DEIR should include a GHG analysis for stationary sources prepared in accordance with the GHG Policy, guidance provided in the comment letter submitted by the Massachusetts Department of Energy Resources (DOER), which is incorporated in this Certificate in its entirety, and this Scope. According to DOER comments, significant updates to the commercial stretch building energy code will go into effect on July 1, 2023 (“July 2023 stretch code”),⁵ which will apply to this project. The July 2023 stretch code makes significant changes and improvements to many sections of the code including envelope performance and thermal bridge accounting, ventilation energy recovery, electrification, ASHRAE Appendix G, and electric vehicle (EV) readiness. The DEIR should include an analysis that calculates and compares GHG emissions associated with a Base Case and a Preferred Alternative that achieves greater reductions in GHG emissions. The Base Case for the warehouse building should represent a building which meets the requirements of the July 2023 stretch code having a Building Performance Factor of 0.41 using ASHRAE 90.1 2019 Appendix G and the other mandatory requirements of Section C401.2.1 of the July 2023 stretch code.

The GHG analysis should clearly demonstrate consistency with the key objective of MEPA review, which is to document the means by which Damage to the Environment can be avoided, minimized and mitigated to the maximum extent feasible. The DEIR should identify the model used to analyze GHG emissions, clearly state modeling assumptions, explicitly note which GHG reduction measures have been modeled, and identify whether certain building design or operational GHG reduction measures will be mandated by the Proponent to future occupants or merely encouraged for adoption and implementation. The DEIR should include the modeling printouts for each alternative and emission tables that compare base case emissions in tons per year (tpy) with the Preferred Alternative showing the anticipated reduction in tpy and percentage by emissions source. Other tables and graphs, such as the table of mitigation measures recommended by DOER, may also be included to convey the GHG emissions and potential reductions associated with various mitigation measures as necessary. The DEIR should provide data and analysis in the format requested in DOER’s letter. The DEIR should clarify the proposed uses within the warehouse building (office, manufacturing, etc.) and what portion of the building this space will occupy.

The DEIR should clearly define all conditioned, semiheated and unconditioned spaces in proposed buildings and describe the degree to which interior spaces will be heated and cooled. It should present an evaluation of mitigation measures and recommendations identified in DOER’s comment letter. In particular, the feasibility of each of the mitigation measures outlined below should be assessed for each of the major project elements, and if feasible, GHG emissions reduction potential associated with major mitigation elements should be evaluated to assess the relative benefits of each measure. The DEIR should explain, in reasonable detail, why certain measures that could provide significant GHG

⁵ The details of this code are available here:

<https://www.mass.gov/info-details/stretch-energy-code-development-2022#final-code-language-for-stretch-code-update-and-new-specialized-stretch-code->

reductions were not selected – either because it is not applicable to the project or is deemed technically or financially infeasible. If financially infeasible, the DEIR should describe the cost effectiveness metrics that were used to evaluate feasibility, whether energy savings that would accrue to future tenants were considered, and what “payback period” the Proponent would deem to be reasonable given the financial constraints identified. It should include a review of available financial incentives potentially available for the project, as described in DOER’s comment letter. At a minimum, the DEIR should consider the following GHG mitigation measures:

- Maintaining envelope integrity with framed, insulated walls with continuous insulation, low air infiltration (confirmed with in-building testing), eliminating thermal bridging, ventilation energy recovery and management of solar heat gains
- Minimizing glass curtain wall assemblies and excessive windows
- Efficient electrification of space heating with either full electrification of space heating with air source heat pumps (ASHPs), or a hybrid of ASHP for primary heating and gas space heating for secondary heating
- Efficient electrification of water heating with ASHPs
- Maximized rooftop solar-readiness (at least 80%) and installed photovoltaic (PV)
- Maximized electric vehicle (EV) charging equipment (10-15% of spaces) and EV ready spaces (20-25% of spaces)

According to the ENF, the proposed hangar buildings could support an approximately 4.6-megawatt (MW) rooftop solar photovoltaic (PV) generating system. The DEIR should review the design and feasibility of the potential rooftop PV system.

Mobile Sources

The GHG analysis should include an evaluation of potential GHG emissions associated with mobile emissions sources. To the extent a traffic study is not conducted, the DEIR may provide estimates based on comparable uses or estimates provided in the 2017 ESPR or 2022 ESPR, if available. The DEIR should follow the guidance provided in the GHG Policy for *Indirect Emissions from Transportation* to determine mobile emissions for Existing Conditions, Build Conditions, and Build Conditions with Mitigation. The DEIR should describe truck loading and staging activities and estimate GHG emissions from idling. The Proponent should thoroughly explore means to reduce overall single occupancy vehicle trips and to minimize air emissions from diesel vehicle traffic. The DEIR should also review measures to promote the use of low-emissions vehicles, including installing EV charging stations and providing designated parking spaces for these vehicles (a minimum of 25% of proposed spaces) with the balance of spaces being EV ready for future installation.⁶ The Build with Mitigation model should incorporate TDM measures, and any roadway improvements implemented by the project, and document the associated reductions in GHG emissions. The DEIR should explain how TDM measures will be monitored and adjusted over time and provide a methodology for quantifying emission reductions impacts rather than an assumed percentage reduction.

⁶ More information on EV infrastructure can be obtained from the MassEVolves program at www.massevolves.org.

Hazardous Waste

According to the ENF, release of hazardous materials has been documented on the site, which has been assigned Release Tracking Number (RTN) #3-0035926 by MassDEP. According to MassDEP, EPA, Navy and Air Force, the project site overlaps with two Superfund sites which are being remediated and monitored by the Air Force and Navy. One of the sites is undergoing an evaluation for development of a plan to remediate PFAS. The project site may be subject to land use controls that must be maintained in order to prevent or reduce human health risks and could require further remediation based on the ongoing evaluations. The DEIR should provide a review of the history and remediation status of releases affecting the project site. It should address how the project will be designed to maintain the land use controls and minimize interference with potential monitoring and remediation activities in the future. I recommend that the Proponent consult with MassDEP, EPA, the Air Force and the Navy regarding the status of monitoring and remediation efforts and any constraints on land use, site design and/or construction practices that may be necessary.

Cultural Resources and Open Space

The site is in an area considered to be archaeologically sensitive due to the proximity of known historic period and ancient Native American archaeological sites; in addition, it is in proximity to the Minute Man National Historical Park, which is a National Historic Landmark and listed in the National Register of Historic Places, and the U.S. Fish and Wildlife Service's (USFWS) Great Meadows National Wildlife Refuge. According to the ENF, the Navy Hangar, also known as the Raytheon Flight Test Facility (BED.555) has been determined to be eligible for listing in the National Register of Historic Places. The Proponent is pursuing state and federal historic rehabilitation tax credits for the renovation of the Navy Hangar.

As requested by MHC, the DEIR should include a historic resources assessment of historic properties within ¼ mile of the project site. Many commenters, including MHC, the National Park Service/Minute Man National Historical Park and USFWS expressed concern that the project will add to the impacts on historical, cultural and open space resources associated with noise, air emissions and vehicular traffic generated by Hanscom operations. The DEIR should provide an assessment of the project's impacts on these resources based on the analyses required above, including construction-period impacts.

Construction Period

Many commenters expressed concern about potential construction-period impacts of the project, including construction vehicle traffic on residential streets. The DEIR should identify potential mitigation measures for minimizing construction impacts. It should describe how construction activities will be managed in accordance with applicable MassDEP regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The DEIR should describe all construction-period impacts and mitigation relative to noise, air quality, water quality, and traffic, including construction vehicle trips through residential areas. It should confirm that the project will require its construction contractors to use Ultra Low Sulfur Diesel fuel, and discuss the use of after-engine emissions controls, such as oxidation catalysts or diesel particulate filters. The DEIR should provide more information regarding the

project's generation, handling, recycling, and disposal of construction and demolition debris (C&D) and identify measures to reduce solid waste generated by the project. I encourage the Proponent to commit to C&D recycling activities as a sustainable measure for the project. Any contaminated material encountered during construction must be managed in accordance with the Massachusetts Contingency Plan (MCP; 310 CMR 40.00) and with prior notification to MassDEP. The project will be required to develop a Stormwater Pollution Prevention Plan (SWPPP) in accordance with its NPDES CGP to manage stormwater during the construction period. The DEIR should describe stormwater management measures that will be implemented during construction. It should describe potential construction period dewatering activities and associated permitting (i.e., NPDES) and identify mitigation measures. All construction-period mitigation measures should be listed in the draft Section 61 Findings.

Mitigation and Draft Section 61 Findings

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

The DEIR should include a commitment to provide a GHG self-certification to the MEPA Office upon construction of the building signed by an appropriate professional indicating that all of the GHG mitigation measures, or equivalent measures that are designed to collectively achieve identified reductions in stationary source GHG emission and transportation-related measures, have been incorporated into the project. If equivalent measures are adopted, the project is encouraged to commit to achieving the same level of GHG emissions (i.e., "carbon footprint") identified in the Preferred Alternative expressed as a volumetric measure (tpy) in addition to a percentage GHG reduction from Base Case. The commitment to provide this self-certification in the manner outlined above should be incorporated into the draft Section 61 Findings included in the DEIR.

Responses to Comments

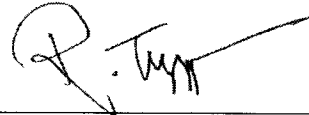
The DEIR should contain a copy of this Certificate and a copy of each comment letter received. It should include a comprehensive response to comments on the ENF that specifically address each issue raised in the comment letter; references to a chapter or sections of the DEIR alone are not adequate and should only be used, with reference to specific page numbers, to support a direct response. This directive is not intended, and shall not be construed, to enlarge the scope of the DEIR beyond what has been expressly identified in this certificate.

Circulation

In accordance with 301 CMR 11.16, the Proponent should circulate the DEIR to each Person or Agency who commented on the ENF, each Agency from which the project will seek Permits, Land Transfers or Financial Assistance, and to any other Agency or Person identified in the Scope. Pursuant to 301 CMR 11.16(5), the Proponent may circulate copies of the DEIR to commenters in a digital format (e.g., CD-ROM, USB drive) or post to an online website. However, the Proponent should make available a reasonable number of hard copies to accommodate those without convenient access to a computer to be distributed upon request on a first come, first served basis. The Proponent should send correspondence accompanying the digital copy or identifying the web address of the online version of the DEIR indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. A copy of the DEIR should be made available for review in the Bedford Public Library.

February 24, 2023

Date



Rebecca L. Tepper

Comments received:

Comments submitted on the MEPA Public Comments Portal

01/26/2023	Rachel Marcus
02/02/2023	Lincoln Miara
02/02/2023	David Lebling
02/03/2023	Peter Halpert
02/03/2023	Judith Sherman
02/06/2023	Scott Richardson
02/06/2023	Tom Haslett
02/06/2023	Masha Obolensky
02/07/2023	Barbara Katzenberg
02/07/2023	Elana McDermott
02/08/2023	Julie Godon
02/08/2023	John Edmondson
02/08/2023	Marlies Comjean
02/08/2023	Karlen Reed
02/08/2023	Samuel Melton
02/09/2023	Walter Gillett
02/09/2023	Yaun Ying
02/09/2023	Zach Abraham
02/09/2023	Seema Patel
02/10/2023	Jeff Miller
02/10/2023	Jonathan Stevens

02/10/2023 Hanscom Field Advisory Commission
02/11/2023 Benjamin Shiller
02/11/2023 Ross Perry
02/11/2023 Courtney Eaton
02/12/2023 Lisa Baylis
02/12/2023 Kingsley and Leslie Brooks
02/12/2023 Kathleen C. Aubrey
02/12/2023 Katherine Durham
02/12/2023 Patricia O'Hagan
02/13/2023 Shannon von Thaden
02/13/2023 Alex Pina
02/13/2023 Heidi Melvin
02/13/2023 Heather Patterson
02/13/2023 Stephen Goodman
02/13/2023 Kathleen Sullivan
02/13/2023 Audrey Gasteier
02/13/2023 Malcom Bryant
02/13/2023 Christine Grabenstatter
02/13/2023 Mohammed Hannan
02/13/2023 Kristine Bowring
02/13/2023 Rajeev Voleti
02/13/2023 Sue Davis
02/13/2023 Erin Sharaf
02/13/2023 Daniel Apczynski
02/13/2023 Irina Mladenova
02/13/2023 Scott Clary
02/13/2023 Clement Tarpey
02/13/2023 Kati Oates
02/13/2023 Carrie Benis
02/13/2023 Shelley Peterson
02/13/2023 Kate McLaughlin
02/13/2023 Melanie Haines
02/13/2023 Town of Lexington
02/13/2023 Belinda Gingrich
02/13/2023 Jeannine Taylor
02/13/2023 Lincoln Planning Board
02/13/2023 Anonymous
02/13/2023 Mark Howell
02/13/2023 Brian Jalet
02/13/2023 Marlene Mandel
02/13/2023 Kimberly Jalet
02/13/2023 Nora Murphy
02/13/2023 Gregory Haines
02/14/2023 Molly Haskell
02/14/2023 Susan O'Dell
02/14/2023 Robert Webber

02/14/2023 Kelly Korenak
02/14/2023 Sarah Lance
02/14/2023 ethan_the_dog@yahoo.com
02/14/2023 Cris Perez
02/14/2023 Richard Canale
02/14/2023 Annemarie Calhoun
02/14/2023 lindawm@yahoo.com
02/14/2023 Town of Lexington
02/14/2023 Mustafa Karabas
02/14/2023 Kimberly Rajdev
02/14/2023 Paula Rose
02/14/2023 Christine Damon
02/14/2023 Douglas Elder
02/14/2023 Lawrence Buell
02/14/2023 Concord Select Board
02/14/2023 Robert Hamilton
02/14/2023 Lincoln Greenhill
02/14/2023 Jill M. Sandeen
02/14/2023 Lisa Elder
02/14/2023 Massport Community Advisory Committee
02/14/2023 Faith Crisley
02/14/2023 Laura Koller
02/14/2023 Save Our Heritage
02/14/2023 Andrew Kvaal
02/14/2023 Town of Bedford
02/14/2023 Scott Milne
02/14/2023 Randi Currier
02/14/2023 James Poage
02/14/2023 Bradford Von Thaden
02/14/2023 Anonymous
02/14/2023 Joe Selle
02/14/2023 Wenjen Hwang
02/14/2023 Mark Murphy
02/14/2023 Philana Gnatowski
02/14/2023 Jessica Packineau
02/14/2023 Shahinaz Carson
02/14/2023 Doug Carson
02/14/2023 D. Jong
02/14/2023 Cheryl Gray

Comments Submitted by Email

02/02/2023 Irene Kowal
02/03/2023 Mothers Out Front Lincoln (144 signers)
02/03/2023 Susan Frommer
02/03/2023 U.S. Navy

02/04/2023	Jennifer Boles
02/05/2023	Amy McCoy
02/06/2023	Christine Damon
02/06/2023	David Eliades
02/06/2023	Jen Murray
02/06/2023	Kingsley and Leslie Brooks
02/06/2023	Mark Hanson
02/06/2023	Robert A McClatchey
02/06/2023	Tom Haslett
02/06/2023	Virginia Lemire
02/07/2023	Brenda Herschbach Jarrell
02/07/2023	David Saletnik
02/07/2023	Gary Davis
02/07/2023	Lincoln Planning Board
02/07/2023	Paul Gingrich
02/08/2023	Amy McCoy
02/08/2023	Annursnac Hill Association
02/08/2023	Eliza Shulman
02/08/2023	Gail O'Keefe
02/08/2023	U.S. Air Force
02/08/2023	J. Yoshida
02/08/2023	Nancy Shepard
02/08/2023	Sallye Bleiberg
02/08/2023	William Kemeza
02/09/2023	Betsy Devine
02/09/2023	Bob Creech
02/09/2023	Cristine Van Dyke
02/09/2023	Donald Saletnik
02/09/2023	Elizabeth Await
02/09/2023	Gary Davis
02/09/2023	Hanscom Field Advisory Commission
02/09/2023	Isabel Bailey
02/09/2023	Jay W. Vogt
02/09/2023	Judy Stein
02/09/2023	Kendra Elliott
02/09/2023	Nicole Palmer
02/09/2023	Rick Moore
02/09/2023	Robert Enders
02/09/2023	Zach Abraham
02/10/2023	Bonnie and David F. Polakoff
02/10/2023	John Conley
02/10/2023	Johnathan Stevens
02/10/2023	Joyce Isen
02/10/2023	Karen Belinky
02/10/2023	Leda Zimmerman
02/10/2023	Paul Shelman

02/10/2023 Save Our Heritage
02/10/2023 Thomas P Flannery
02/10/2023 Vicky Diadiuk
02/11/2023 Adam Liberman
02/11/2023 Dustin Tingley
02/11/2023 Elaine Jones
02/11/2023 Heather Packard
02/11/2023 Joshua Newman
02/11/2023 Roy McCloskey
02/11/2023 Susan Jancourtz
02/11/2023 Walter Gillett
02/12/2023 Bija Satterlee
02/12/2023 Brooks Stevens
02/12/2023 Catherine Parmelee
02/12/2023 Daniel L Schrager
02/12/2023 David Pillbeam and Maryellen Ruvolo
02/12/2023 Emma Melton
02/12/2023 Heidi Kaiter
02/12/2023 Jai Kaur Annamaria San Antonio
02/12/2023 Janet C Miller
02/12/2023 Kate Kavanaugh
02/12/2023 Laurie O'Neill and George Lauder
02/12/2023 Marian Hobbs
02/12/2023 Thomas P Flannery
02/12/2023 Wendy Reasenber
02/13/2003 Carol and David Haines
02/13/2023 Richard Baughman and Petition with 105 signers
02/13/2023 Adrienne Kimmell
02/13/2023 Alex Chatfield
02/13/2023 Alex Pina
02/13/2023 Anirban Chaterjee
02/13/2023 Ann and Nathan Parke
02/13/2023 Anne Lovell
02/13/2023 Ben McLaughlin
02/13/2023 Carrie Benis
02/13/2023 Chip and Deliana Ernst
02/13/2023 Coreen Garrett
02/13/2023 David L. Negrin
02/13/2023 Dennis Frenchman
02/13/2023 Dereck Blackburn and Rebecca Hazelton
02/13/2023 Dilla Tingley
02/13/2023 Doug Carson
02/13/2023 Edward Sonn
02/13/2023 Ellen Sebring
02/13/2023 U.S. Environmental Protection Agency (EPA)
02/13/2023 Erika Maalouf

02/13/2023 Gail O'Keefe
02/13/2023 Gale S. Haydock
02/13/2023 Ira N. Goldman
02/13/2023 Isac Lee
02/13/2023 Jeannine Taylor
02/13/2023 John Mandler
02/13/2023 Josh Tabata
02/13/2023 Joy Duffy
02/13/2023 Judith and Paul Newman
02/13/2023 Kate Flora
02/13/2023 Kate McKaughlin
02/13/2023 Kate Rossetti
02/13/2023 Kathryn Rifkin
02/13/2023 Kay Corry Aubrey
02/13/2023 Kenda Carlson
02/13/2023 Kimberly Jalet
02/13/2023 Laura Crosby
02/13/2023 Lincoln Select Board
02/13/2023 Mary Fenoglio and Warren Covert
02/13/2023 Mary White
02/13/2023 Melissa Karczewski
02/13/2023 Melita Sawyer
02/13/2023 National Park Service
02/13/2023 Neil Dale
02/13/2023 Nicholas Ribush
02/13/2023 Nina Hackel
02/13/2023 Pat Keane
02/13/2023 Patrick Eaton
02/13/2023 Phoebe Francis
02/13/2023 Robin Wilkerson
02/13/2023 Sharon and Peter Burke
02/13/2023 Sue Davis
02/13/2023 Susan Stason
02/13/2023 Town of Bedford
02/14/2023 Amanda Patrick
02/14/2023 Amy Cook/Wright
02/14/2023 Andrew S Pang
02/14/2023 Anne Buxton Sobol
02/14/2023 Aparajita Chatterjee
02/14/2023 Barbara Williams
02/14/2023 Bobbi Eliades
02/14/2023 Brian Hough
02/14/2023 Caitlin Selle and Alec Walker
02/14/2023 Carol Boris
02/14/2023 Carolyn Montie
02/14/2023 Cheryl Mandler

02/14/2023 Chris Pace
02/14/2023 Christie and James Martin
02/14/2023 Christie Martin
02/14/2023 Christine Size
02/14/2023 Christine Wojnar
02/14/2023 Concord Historical Commission
02/14/2023 Concord Select Board
02/14/2023 Corinne Doud
02/14/2023 Craig Nicholson
02/14/2023 Cynthia Frenkil
02/14/2023 David McCoy
02/14/2023 David W Swain and 5 co-signers
02/14/2023 David Williams
02/14/2023 Dimitrios Stefanis
02/14/2023 Doug Elder
02/14/2023 Drew Chrostek
02/14/2023 Edward C. Kern, Jr. and Priscilla D. Kern
02/14/2023 Edward Young
02/14/2023 Elizabeth Coules
02/14/2023 Ellen O'Donnell
02/14/2023 Erin Quackenbush
02/14/2023 Fernando Colon Osorio and Laurie Margolies
02/14/2023 Gail Hire
02/14/2023 Garret Whitney
02/14/2023 Hope O'Brien Jones
02/14/2023 Iris Brough
02/14/2023 Ismail Nabih
02/14/2023 J. Francis Stein
02/14/2023 James F Williams
02/14/2023 Janice Locke
02/14/2023 Jeanne P. Canale
02/14/2023 Jenn Lachey
02/14/2023 Jennifer Boles
02/14/2023 Jim and Iryna McDonald
02/14/2023 Joan Geoghegan
02/14/2023 Joan Wolcott Elliott
02/14/2023 Jon Andersen/Miller
02/14/2023 Joseph Selle
02/14/2023 Joseph Stein
02/14/2023 Kate Chartener
02/14/2023 Kate Dimancescu
02/14/2023 Katherine Ives
02/14/2023 Katrina L. Kelner and Norman Hershkowitz
02/14/2023 Ken Farbstein
02/14/2023 Ken Fischl
02/14/2023 Kirthana Beaulac

02/14/2023 Kristen Hough
02/14/2023 Laura Davis
02/14/2023 Lauren Herbert
02/14/2023 Lila Selle
02/14/2023 Lincoln Green Energy Committee
02/14/2023 Lincoln Land Conservation Trust
02/14/2023 Linda D. White and Robert R. White
02/14/2023 Linda Lazar
02/14/2023 Linda Rudd
02/14/2023 Marcie R. Black
02/14/2023 Margo Fisher-Martin
02/14/2023 Mark Gailus and Tanya Gailus
02/14/2023 Mark M. Myles
02/14/2023 Mark Rubman
02/14/2023 Mark Sutherland
02/14/2023 Mary Kostman
02/14/2023 Mary Stechschulte
02/14/2023 Massachusetts Department of Environmental Protection (MassDEP)
02/14/2023 Massport Community Advisory Committee
02/14/2023 Matthew Gasteier
02/14/2023 Melanie Coo
02/14/2023 Melinda Ballou
02/14/2023 Massachusetts Historical Commission (MHC)
02/14/2023 Mitchell and Sara Levine
02/14/2023 Padma Choudry
02/14/2023 Pamela Nelson
02/14/2023 Patricia and Steve Dahlgren
02/14/2023 Patrick J. Stevens
02/14/2023 Peter and Lucy Sprayregen
02/14/2023 Randi Currier
02/14/2023 Ray Considine and Edie Lipinski
02/14/2023 Representative Kenneth I. Gordon
02/14/2023 Representative Michelle Ciccolo
02/14/2023 Richard Canale
02/14/2023 Rosemary Tolwinski
02/14/2023 Roy Collings
02/14/2023 Rural Land Foundation
02/14/2023 Russell Gershman
02/14/2023 Sally Kindleberger
02/14/2023 Sandy Currier
02/14/2023 Sara Cherkerzian
02/14/2023 Sara Mattes
02/14/2023 Scott Mirabiro
02/14/2023 Scott Rodman
02/14/2023 Shah Carson
02/14/2023 Stuart Fried and Louise Berliner

02/14/2023 Susan and George Seeley
02/14/2023 Susan Foster Jones
02/14/2023 The Walden Woods Project
02/14/2023 Thomas and Joan Kenny
02/14/2023 Timothy M. Jones
02/14/2023 Tina A. Grotzer
02/14/2023 Town of Lexington
02/14/2023 U.S. Fish and Wildlife Service (USFWS)
02/14/2023 Valerie Gurney and Matt Daniel
02/14/2023 Virginia Lemire
02/14/2023 Virginia Welles
02/14/2023 WIDE Lincoln
02/14/2023 William J. Freitas
02/14/2023 William Stason
02/15/2023 Igor Dobrusin
02/15/2023 James Carlson
02/15/2023 Jessica Cooper
02/15/2023 Massachusetts Water Resources Authority (MWRA)
02/15/2023 Robin Dobrusin
02/16/2023 Marlies Henderson
02/17/2023 Jill Baker
02/17/2023 Anne Lehmann
02/19/2023 Linda Shalon
02/20/2023 Senator Mike Barrett and 33 co-signers
02/21/2023 Gina and Metin Elyazar
02/21/2023 Kati Winchell
02/21/2023 Tabassum Huseni
02/22/2023 Department of Energy Resources (DOER)
02/22/2023 Vincent Da Forno
02/23/2023 Christen Hart

RLT/AJS/ajs