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August 16, 2021

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

PROJECT NAME : Taxiway C Realignment and Runway Safety Area Project  
PROJECT MUNICIPALITY : Norwood  
PROJECT WATERSHED : Neponset River/Boston Harbor  
EEA NUMBER : 15208  
PROJECT PROPONENT : Norwood Airport Commission  
DATE NOTICED IN MONITOR : July 9, 2021

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Environmental Impact Report (Single EIR) and hereby determine that it **adequately and properly** complies with MEPA and its implementing regulations.

Project Description

As described in the Single EIR, the project includes work necessary to improve the safety of airport operations, including relocation of a 1,350-foot (ft) long section of Taxiway C from Taxiway F to Taxiway A. Under existing conditions, Taxiway C parallels Runway 10-28 from the eastern terminus of Taxiway C to its intersection with Taxiway F, where it angles to the south and intersects Runway 17-35. The project will extend the alignment of Taxiway C parallel to Runway 10-28 for a distance of 800 feet west of Taxiway F, at which point Taxiway C will angle to the south and intersect Runway 17-35. A 40-ft section of Taxiway C will be reconstructed between Runway 17-35 and Taxiway A. This realignment will improve safety by correcting the existing condition that provides direct access between the aircraft parking area (apron) and Runway 17-35, and by creating a perpendicular intersection of Taxiway C and Taxiway F.

Pavement from the sections of Taxiway C to be replaced will be removed and the areas restored as Bordering Vegetated Wetlands (BVW) or to provide compensatory flood storage.

The project also includes paving the 300-ft long Runway Safety Areas (RSA) at both ends of Runway 17-35 to provide additional runway length for aircraft taking off from or landing on that runway. The paved runway is currently 4,008 ft long and 100 ft wide with unpaved 300-ft by 100-ft RSAs at each end. According to the Single EIR, the twin engine aircraft and corporate jets that increasingly use the airport must limit their weight by taking on less fuel or fewer passengers in order to safely take off or land on this runway. The project includes paving the two RSAs to lengthen the paved runway by 600 ft to increase Take off Distance Available (TODA) to 4,600 ft and Accelerated Stop Distance Available (ASDA) to 4,307 ft.

The project components described in the Single EIR were previously described in an Expanded Notice of Project Change (ExNPC) filed in November 2020 and are part of a larger project originally described in a Final Environmental Impact Report (FEIR) submitted in October 2016. A Certificate on the FEIR was issued on November 30, 2016 and determined that the project adequately and properly complies with MEPA and its implementing statutes. As described in the FEIR, the original project included the realignment of two taxiways to comply with Federal Aviation Administration (FAA) safety and design standards and to promote improved operational efficiencies. Specifically, the original project included the relocation of a 600-ft long section of Taxiway A at the Runway 35 end to achieve both a 240-ft separation between the taxiway and Runway 35 and a safer alignment of the intersection of Taxiway A and Runway 17-35 that meets intersection standards for the Airport's design aircraft.<sup>1</sup> In addition, the original project included realignment of Taxiway D, a short "stub" taxiway that connects the Airport's apron area to the main Runway 17-35, to improve safety for aircraft maneuvering between Runway 17-35 and the aircraft apron. The Taxiway A and Taxiway D projects have been constructed. As described above, the project changes detailed in the ExNPC includes the relocation of Taxiway C and paving the RSAs on both ends of Runway 17-35, both to comply with FAA safety regulations.

#### Changes Since the Filing of the ExNPC

As described in the ExNPC, the section of Taxiway C parallel to Runway 10-28 would have been extended by approximately 320 feet before Taxiway C angled to the south to intersect Runway 17-35. The design proposed in the Single EIR, will relocate the 1,350-ft long segment of Taxiway C from Taxiway F to Taxiway A, by shifting the angle within the current Taxiway C configuration 800 lf to the west. A new 800-ft segment of Taxiway C will extend west of Taxiway F parallel to Runway 10/28. A second 360-ft segment will be constructed from this new angle to Taxiway A. The existing Taxiway C will be removed and replaced with a wetland mitigation and floodplain compensation area east of Runway 17/35. This revised design will avoid the need to relocate airport instrumentation that would have been located in the taxiway

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<sup>1</sup> The design aircraft are those types of aircraft that frequently use the airport (more than 500 times a year) and have the largest wingspans, the heaviest operating weights, and the highest landing speeds. An airport's geometric layout and design of runways, taxiways, aprons, and other facilities must provide adequate wingspan clearances, safety area offsets, and pavement strengths to accommodate design aircraft.

object free area (TOFA) of the formerly proposed alignment. Compared to the ExNPC design, the revised design will reduce permanent impacts to Bordering Vegetated Wetlands (BVW) and Land Under Water (LUW) by 3,455 sf and 2,400 sf (respectively), and will avoid the need to relocate the existing airport instrumentation. The Single EIR also included revised impact calculations for land alteration and impacts to Bordering Land Subject to Flooding (BLSF) which account for impacts associated with the stormwater management infrastructure and associated grading and the compensatory flood storage area.

The Single EIR also identified an additional project which received funding for construction under the Town of Norwood's Capital Improvements Plan for fiscal year 2023. Specifically, a portion of existing wildlife exclusion fencing will be replaced and relocated to more accessible areas of the Airport to facilitate future maintenance, including removal (where feasible) from wetland areas. Approximately 13,700 linear feet (lf) of fence will be installed in the new location and 14,350 lf of fencing will be removed; this relocation will have the effect of moving nearly all of the current fencing out of vegetated wetland areas.

### Project Site

The airport is located on a 685-acre site in Norwood. It is bordered to the east by the Neponset River and Interstate-95 (I-95), to the west by residential development and Route 1, to the south by a residential neighborhood, and to the north by Purgatory Brook and the Lost Brook Golf Club. It is located within the Fowl Meadow and Ponkapoag Bog Area of Critical Environmental Concern (ACEC) and contains mapped areas of Priority Habitat for Long's Bulrush (*Scirpus longii*), a state-listed Threatened plant.

Nearly all the undeveloped portions of the site are comprised of BVW and other wetland resource areas and located within the floodplain of the Neponset River. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (FIRM) (25021C0183E and 25021C0191E, effective July 17, 2012), the site is located in the 100-year floodplain (Zone AE) with a Base Flood Elevation (BFE) of 47.1 ft North American Vertical Datum of 1988 (NAVD 88). Approximately 500-ft of the eastern end of Runway 10-28 is located in a regulatory Floodway within Zone AE. The section of the Neponset River adjacent to the site is an impaired waterbody subject to a Total Maximum Daily Load (TMDL) for pathogens.

The airport has been operating since 1942 and serves as a public use, general aviation facility that accommodates approximately 60,000 landings and takeoffs each year. The airport includes two paved runways. The primary runway, Runway 17-35, is aligned northwest-southeast and is approximately 4,008 ft long by 100 ft wide. The crosswind runway, Runway 10-28, is aligned west-east and is approximately 3,995 ft long by 75 ft wide. Paved taxiways designated A, B, C, D, E, F and G facilitate the entering and exiting of runways by aircraft. Taxiways A, C and F are of most relevance to the project. Taxiway A runs in a north-south orientation parallel to Runway 17-35 and intersects the western end of Runway 10-28. Taxiway C extends northeast from an apron located at the western edge of the airfield, crosses Taxiway A and Runway 17-35 and bends to the east at its intersection with Taxiway F to parallel the eastern half of Runway 10-28. Taxiway F is a short taxiway that connects Runway 10-28 and Taxiway C near the middle of the runway.

The Airport operates an air traffic control tower (ATCT) that provides aircraft control and separation services, and a non-precision instrument landing system for runway approaches. The Airport contains a total of 170,733 square feet (sf) of floor space on the west side of the site, including an administration building, a flight school, maintenance buildings, aircraft hangers, the ATCT, and fuel storage facilities. The site includes a paved parking lot with 174 spaces.

### Environmental Impacts and Mitigation

Impacts associated with the relocation of Taxiway C and paving of the Runway 17-35 RSAs include: alteration of approximately 16.23 acres of land, addition of 85,288 sf (1.96 acres) of impervious area and alteration of the following resource areas: BVW (31,045 sf; 0.7 acres) Riverfront Area (86,484 sf; 1.99 acres), Bordering Land Subject to Flooding (BLSF) (386,972 sf; 8.9 acres), Bank (8 lf), and LUW (123 sf). Work associated with the Taxiway C relocation and the paving of RSAs will require a Variance from the Wetlands Protection Act because it will alter greater than 5,000 sf of BVW and cannot comply with the BVW performance standard identified at 310 CMR 10.55(4)(e) which prohibits destruction or impairment of BVW located within an ACEC. The Single EIR also disclosed new work associated with removal and replacement of wildlife exclusion fencing which would result in additional temporary impacts to wetland resource areas associated with the use of timber mats, but result in removal of most of the fencing outside wetland resource areas. The Single EIR did not quantify these temporary impacts but noted that the Proponent is committed to maintaining temporary mat impacts to under 5,000 sf to avoid the need for additional permits or a wetland variance.

Measures to avoid, minimize and mitigate environmental impacts include construction of a 1.42 acre-BVW replication area, daylighting a portion of a stream, regrading of portions of the site to provide compensatory flood storage, construction of an on-site stormwater management system that will comply with the Wetlands Regulations (310 CMR 10.00) and associated performance standards including the stormwater management standards (SMS) to the maximum extent practicable, implementation of off-site stormwater mitigation measures, recycling of asphalt removed by the project and implementation of construction-period mitigation measures.

### Permitting and Jurisdiction

The project is undergoing MEPA review and subject to preparation of a mandatory EIR pursuant to Section 11.03(3)(a)(2) of the MEPA regulations because it requires State Agency Actions and requires a Variance from the Wetlands Protection Act (WPA) for BVW impacts of greater than 5,000 sf and the inability to comply with the BVW performance standard at 310 CMR 10.55(4)(e). The project also meets the ENF threshold at 301 CMR 11.03(11)(b) because it is located within a designated ACEC. The project will require a Section 401 Water Quality Certificate (WQC) for Major Fill/Excavation (BRP WW 10) and a WPA Variance from the Massachusetts Department of Environmental Protection (MassDEP). It is subject to review by the Natural Heritage and Endangered Species Program (NHESP) in accordance with the Massachusetts Endangered Species Act (MESA) and will require a Section 8(m) permit from the Massachusetts Water Resources Authority (MWRA) to construct within or near MWRA water and sewer easements. The project is subject to the MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol.

The project will require a local Order of Conditions (OOC) pursuant to a local bylaw from the Norwood Conservation Commission. It requires approval under Section 404 of the Clean Water Act in the form of a Pre-Construction Notification (PCN) to the Army Corps of Engineers (ACOE) under the Massachusetts General Permits, a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the United States Environmental Protection Agency (EPA) and review by the Massachusetts Historical Commission (MHC) pursuant to Section 106 of the National Historic Preservation Act.

Because the project is receiving Financial Assistance from the Massachusetts Department of Transportation (MassDOT) Aeronautics Division, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

### Review of the Single EIR

The Single EIR included a detailed description of the proposed project, identified existing conditions, described changes to the project since the filing of the ExNPC, and identified potential environmental impacts and mitigation measures. The Single EIR included updated site plans for existing and post-development conditions. The Single EIR included a list of required State Permits and provided an update on the status of each of these pending approvals. The Proponent's consultant provided supplemental information on August 5, 13 and 15, 2021 to facilitate MEPA review.<sup>2</sup> The supplemental information provided updated impact calculations, addressed alternative locations for stormwater mitigation, total suspended solids (TSS) removal rates, and rare species.

As requested by the Scope, the Single EIR clarified that there have been no known releases of per- and poly-fluoralkyl substances (PFAS) dating back to at least 1995 (when the current airport manager was hired) and that the airfield does not store firefighting foam on the site. The Single EIR also provided an update on consultation with State Agencies that has occurred since the ExNPC was submitted. According to the Single EIR, a meeting was held on January 19, 2021 with MassDEP regarding the Variance Order of Condition submittal requirements and preliminary stormwater design. After this meeting, the Proponent followed up by submitting details of the proposed stormwater management design to MassDEP for preliminary review. Additionally, a consultation with NHESP was held on February 4, 2021 regarding the evaluation of potential impacts to the listed species of concern. Comments from MassDEP and NHESP do not request further review in the form of a Supplemental EIR, but provide details on additional information that will be required during subsequent permitting.

### *Wetlands and Stormwater*

The Single EIR and supplemental information provided an updated description and summary table of impacts to wetland resource areas. The project will impact BVW (31,045 sf), LUW (123 sf), BLSF (8.9 acres), Bank (8 lf), and Riverfront Area (1.99 acres). The Single EIR also disclosed new work associated with removal and replacement of wildlife exclusion fencing which would result in additional temporary impacts to wetland resource areas associated with the use of timber mats. Approximately 13,700 lf of fence will be installed in the new location and

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<sup>2</sup> Emails sent from Alyssa Jacobs (Epsilon Associates) to Page Czepiga (MEPA Office) on August 5 and 13, 2021.

14,350 lf of fence will be removed; this relocation will have the effect of moving nearly all of the current fencing out of vegetated wetland areas. According to the Single EIR, the fence replacement is being designed such that construction access for any future work will occur from upland areas to the maximum extent possible. The Single EIR did not quantify impacts associated with this work but noted that the Proponent is committed to maintaining temporary mat impacts to under 5,000 sf to avoid the need for additional permits or a wetland variance. As discussed, this work will have the benefit of moving most of the current fencing outside wetland resource areas. As noted below, additional information will need to be provided to NHESP to address potential rare species impacts associated with these activities and the use of timber mats.

As requested by the Scope, the Single EIR provided a description and conceptual wetland plans (Appendix B) for the proposed 1.42-acre wetland replication area. It also described impacts to BLSF associated with both the taxiway relocation and RSA paving components of the project, and identified the volume of flood storage at each elevation lost due to construction of the project and provided calculations in support of the proposed compensatory storage to be provided. Approximately 4,399 total cy of flood storage will be lost due to placement of fill associated with Taxiway C (4,098 cy) and the Runway Safety Areas (301 cy). The project will provide a total of 5,370 cy of compensatory storage to mitigate for this fill, resulting in a net gain of 971 cy of storage. I refer the Proponent to comments from MassDEP which indicate that the elevation of the ground surface alone does not determine the volume of compensatory storage that can be provided, as the water surface controls what can be provided incrementally at each elevation. During permitting, the Proponent will need to demonstrate that the seasonal high groundwater is at or below the elevation of the compensatory flood storage to be provided. The Single EIR indicated that alterations within BVW and BLSF will have a negligible effect on wildlife habitat functions due to their largely previously altered conditions. The Single EIR provided an assessment of the wildlife habitat to be provided by the BVW replication and compensatory flood storage areas. The Single EIR indicated that these mitigation areas will be designed to improve habitat value through incorporation of habitat features such as burrowable soils, seasonal pockets of standing water, and densely planted herbs. I refer the Proponent to comments from MassDEP which identifies information that should be provided as part of the Variance application.

The project will create 1.96 acres of new impervious area (5.46 total acres). According to the Single EIR, the proposed stormwater management system has been designed to meet MassDEP's Stormwater Management Standards (SMS) to the maximum extent practicable. Specifically, the project will fully comply with SMS Standards # 1, 5, 6, 7, 8, 9 and 10 on-site. According to the Single EIR, compliance with SMS Standards # 2 (attenuate peak discharge), #3 (recharge) and #4 (total suspended solids (TSS) removal) cannot be achieved on-site due to the high-water table, lack of hydrologic head, FAA design standards and lack of upland space. Therefore, these impacts will be mitigated through the installation of a proposed stormwater best management practice (BMP) at an off-site location (described below) within the same receiving waterbody for stormwater discharges from the project site.

Comments from MassDEP indicate that off-site mitigation may be considered if the applicant can demonstrate that onsite mitigation is not practicable and request that off-site mitigation be prioritized in the following order: 1) adjacent site, 2) same wetland system, 3) same town, and 4) same subwatershed. The Single EIR included an evaluation of two Town-owned locations for the provision of mitigation to address SMS #2, #3, and #4: the off-site F.A.

Cleveland School and the on-site Access Road Parking Lot. Supplemental information clarified that the presence of a high groundwater table will prevent on-site infiltration from occurring in accordance with the SMS either on the airfield or at the Access Road Parking Lot location. The Single EIR identified the off-site F.A. Cleveland School as the location for off-site mitigation BMP because it is within the same town and within the same subwatershed as the project. Additionally, the F.A. Cleveland School site was selected as it currently lacks stormwater management infiltration BMPs to address runoff from the buildings and parking lot and is adjacent to Ellis Pond, an upstream contributing waterbody to the Neponset River. The Single EIR included a conceptual plan of the proposed infiltration basin BMP and indicated that this off-site stormwater mitigation BMP has been designed to attenuate peak discharges (SMS #2) and to provide at least 1,269 cf of on-line subsurface storage to be infiltrated (SMS #3).

SMS #4 requires removal of 80 % of TSS. The Single EIR indicated that the type and extent of water quality treatment at each area varies due to site constraints and grading limits associated with FAA geometrical and vertical (slope) requirements. Supplemental information was provided to clarify the TSS removal rates of the stormwater system, as summarized in the below table. As indicated below, none of the on-site locations will fully meet SMS #4 (though some pretreatment is provided to mitigate the impact of the new impervious area added to the site), but further mitigation is proposed by the off-site stormwater mitigation BMP at the F.A. Cleveland School. As noted, the school is adjacent to Ellis Pond, an upstream contributing waterbody to the Neponset River, which is the ultimate receiving waterbody for stormwater discharges from the project site. This BMP will use a three-tiered approach to pretreatment by use of deep sump catch basins, street sweeping measures, and an isolator row system to capture sediment and debris in the subsurface stormwater infiltration device. According to the supplemental information, with the inclusion of this off-site mitigation measure, the project will achieve overall TSS removal rates (90% for new development, 80% for redevelopment) and phosphorous removal (60% for new development, 50% for redevelopment) as required in the EPA 2016 Massachusetts MS4 General Permit.

Location	Pretreatment	Proposed Treatment Device	Presumed TSS Removal
<b>Location 1</b> Runway Safety Area 17	Vegetated Filter Strips, Sediment Forebays	Extended Dry detention basin	Total Treatment: 79%
<b>Location 2</b> Runway Safety Area 35	Vegetated Filter Strip (>50' length)	None. Mitigated Elsewhere	Pretreatment: 10%
<b>Location 3</b> Stub Taxiway C	Vegetated Filter Strips, Deep Sump Catch Basins	None. Mitigated Elsewhere	Pretreatment: 33%
<b>Location 4</b> Taxiway C Realignment	Vegetated Filter Strips, Deep Sump Catch Basins	None. Mitigated Elsewhere	Pretreatment: 33%
<b>Offsite Mitigation</b> F.A. Cleveland School	Deep Sump Catch Basins Aggressive Street Sweeping Stormtech Isolator Row+	Subsurface Infiltration System	Total Treatment designed so to meet project's overall TSS removal requirements (90% for new development, 80% for redevelopment) and phosphorous removal (60% for new development, 50% for redevelopment).

Comments from MassDEP indicate that, as part of the Variance application, the Proponent should also demonstrate that the off-site mitigation for stormwater management provides all remaining requirements of the SMS that cannot be mitigated onsite. Comments also identify other information regarding compliance with SMS that should be provided during the permitting process.

### *Rare Species*

The project will occur within *Priority Habitat* for Long's Bulrush (*Scirpus longii*), a species listed as "Threatened" pursuant to the Massachusetts Endangered Species Act (MESA) (MGL c. 131A) and its implementing regulations (321 CMR 10.00). Work within this area includes paving a portion of Runway 35 RSA. Specifically, the project will impact 35,750 total sf, including 15,750 sf of permanent impacts to upland habitat through paving activities and an additional 20,000 sf of temporary impacts through grading activities. The Scope for the Single EIR requested that the Proponent consult with NHESP regarding additional information, including a botanical survey of Long's Bulrush, that should be provided in the Single EIR. The Proponent consulted with NHESP regarding completion of a survey for Long's Bulrush; however, the results of the botanical survey are not yet available. As such, NHESP has indicated that they cannot fully evaluate whether the project will have direct or indirect impacts to state-listed species and their habitats, or whether a "Take" of such species will result from the project.

Supplemental information provided by the Proponent's consultant clarified that the botanical survey was conducted in June 2021, after the plant had flowered to allow for positive identification. According to the supplemental information, the survey results indicated that there were no specimens identified within the proposed limits of disturbance and the closest individual plant observed was approximately 80-ft from the limits of work. The supplemental information clarified that a survey report is being drafted and will be submitted shortly to NHESP. This supplemental information was provided during the MEPA review period. I refer the Proponent to comments from NHESP which request that the Proponent submit the results of the botanical survey with a project plan that identifies the proposed limits of work, inclusive of all grading, staging, stockpiling, vegetation clearing, and all wetland resource area delineations. NHESP comments also recommend that the Proponent initiate pre-filing consultations regarding the perimeter fence replacement to proactively address potential MESA review requirements. The Proponent should coordinate a pre-filing meeting with NHESP to identify information for inclusion in permit applications.

At this time, it is not clear whether the projects identified in the Single EIR will result in a "Take" of state-listed species, and, accordingly, this ENF threshold was not identified for this project. Comments from NHESP indicate that the Division anticipates working with the Proponent to resolve concerns for state-listed species and their habitats through the MESA review process. The Proponent is directed to submit a Notice of Project Change (NPC) should NHESP determine that the project (including perimeter fence replacement) will result in a "Take" of state-listed species such that a Conservation and Management Permit (CMP) is required. The NPC should address how the Proponent intends to provide appropriate mitigation for any such "Take."



*Climate Change*

Governor Baker's Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth (EO 569; the Order) was issued on September 16, 2016. The Order recognizes the serious threat presented by climate change and directs Executive Branch agencies to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts. The Order seeks to ensure that Massachusetts will meet GHG emissions reduction limits established under the Global Warming Solution Act of 2008 (GWSA) and will work to prepare state government and cities and towns for the impacts of climate change. I note that the MEPA statute directs all State Agencies to consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise, when issuing permits, licenses and other administrative approvals and decisions. M.G.L. c. 30, § 61.

*Greenhouse Gas Emissions*

The Proponent was not required to prepare a GHG analysis in connection with the original project because the project is limited to the realignment of taxiways and paving of RSA areas, and does not result in new stationary sources of GHG emissions. As requested by the Scope, the Single EIR provided an updated review of the airport's on-going efforts to minimize GHG emissions. GHG mitigation strategies currently employed at the airport include: installation of LED lights; use of motion sensors on lights; participation in the FAA's Voluntary Airport Low Emissions (VALE) Program; control of idling by aircraft; potential for installation of solar canopies at airport parking lot on Access Road; upgrading airport maintenance vehicles; and completion of energy audits on on-site buildings. The Single EIR also identified recent improvements to town-controlled buildings, including updating the administration offices to current building codes, retrofitting them with translucent walls to allow for daylighting, and installation of a new energy efficient HVAC system. I refer the Proponent to comments from the Department of Energy Resources (DOER) which identify strategies for energy efficient buildings that the airport can incorporate on future projects and incentives for implementing them.

*Adaptation and Resiliency*

The Single EIR discussed the risk and vulnerabilities of the site under current and future climate conditions, including increased precipitation, flooding, drought, and extreme heat. This evaluation was based on data from the Climate Change Clearing house for the Commonwealth ([www.resilientMA.org](http://www.resilientMA.org)) and review of the Town's Hazard Mitigation Plan and the report generated by participation in the Commonwealth's Municipal Vulnerability Preparedness (MVP) program. The Single EIR clarified the project will have a design life of at least 20 years, with proper operation and maintenance.

The Single EIR clarified that the stormwater management system improvements will be designed to accommodate future increases in precipitation associated with climate change. Specifically, as recommended by MassDEP, all current and future upgrades to the stormwater management system will be designed for storm events and peak precipitation values derived from the upper confidence interval times a factor of 0.9 of the National Oceanic and Atmospheric Administration (NOAA) 14 precipitation frequency atlas to account for the predicted increase in rainfall quantities and frequency for the region. I commend the Proponent

for incorporating this recommendation into the project design. Supplemental information clarified that the stormwater evaluation also considered flooding elevations for the 100-yr, 24-hour storm event. According to this information, flooding will be contained on-site and shall be controlled at the airfield to promote operational safety by limiting flood elevations to grassed infields adjacent to taxiways and runways.

The Single EIR identified the airport's high risk of flooding due to its location within the FEMA floodplain and floodway and its proximity to the Neponset River. Approximately 500-ft of the eastern end of Runway 10/28 and the access road south of Runway 17/35 are mapped as FEMA floodways. The Single EIR indicated that flooding has not reached airport structures, but it has impacted some aircrafts and resulted in closure of runways due to complete inundation. The Single EIR identified flood protection projects that have been completed within the vicinity, including channel and drainage maintenance, improvements beneath the Washington Street bridge and at the Norwood Airport, and use of specific vegetation management techniques to avoid cut tree limbs blocking channels of the Neponset River. The Single EIR indicated that the MVP Report prioritized the clearing of downed trees around the Neponset River as one action that can reduce airport flooding. I encourage the Proponent to prioritize these activities and to consider additional methods to mitigate flood risks to the site.

The Single EIR identified design measures that were incorporated into the project to increase its resiliency to drought conditions and extreme heat events. To minimize susceptibility to drought conditions, the project will utilize a native drought-tolerant plant seed mix for the upland grassy areas and will utilize native wetland plants within the replication area. Drought is not anticipated to have any effects on the taxiway or RSA construction or pavement. The project will incorporate green infrastructure and white roofs (where feasible). To address heat sinks, the Town will also use a lot leasing bylaw to encourage green infrastructure, white roofs, and landscaping for parking lots and redevelopment within the airport.

### *Construction*

The project will be constructed in phases as funding becomes available. The currently anticipated construction schedule is as follows:

- 2022 – wetland replication and compensatory storage areas, Taxiway C realignment and stormwater management infrastructure for Taxiway C;
- 2023 – Off-site Stormwater Mitigation Area (summer); commence wildlife exclusion fence replacement – Phase 1 (fall);
- 2024 – Complete wildlife exclusion fence replacement – Phase 2 (fall); and
- 2026 – RSA paving and associated stormwater management (fall).

The Single EIR clarified that the project will require excavation of approximately 17,908 cy of material. It provided a description of the project's generation, handling, recycling, and disposal of construction and demolition (C&D) debris and identified measures to reduce solid waste generated by the project.

*Mitigation and Draft Section 61 Findings*

The Single EIR provided draft Section 61 Findings for use by State Agencies. The Section 61 Findings should be provided to State Agencies to assist in the permitting process and issuance of final Section 61 Findings. The Single EIR identified permitting requirements and measures that will be employed to avoid, minimize and mitigate environmental impacts. These include:

*Wetlands*

- Provision of on-site mitigation at 2:1 ratio (replicated : impacted) for permanent BVW impacts (1.42-acre replication area) and provision of 5,370 cy of compensatory storage (resulting in a net gain of 971 cy);
- Monitoring of the wetland replication area for five growing seasons by a qualified wetland scientist to ensure its success;
- Daylighting 110-lf of a culverted perennial stream, restoration of the channel to the bankfull width, and creation of fringe wetland habitat;
- Use of sediment control methods during work proximate or in wetland resource areas; and
- Restoration of all temporarily disturbed resource areas in-kind.

*Stormwater*

- Stormwater management systems will be designed to meet TSS removal requirements (90% for new development, 80% for redevelopment) and phosphorous removal (60% for new development, 50% for redevelopment) as required in the EPA 2016 Massachusetts MS4 General Permit) through a combination of on- and off-site stormwater mitigation;
- Increase in peak Runoff for Runway 17 and Runway 35 RSAs, Taxiway 'C' Realignment will be mitigated by off-site stormwater mitigation so that the Project results in a reduction in annual stormwater pollutant loads to the watershed as a whole; and
- Vegetative Filter Strips, Sediment Forebays, Deep Sump catch basins will be used, in series, in varying combinations where practicable to maximize the amount of TSS removal.

*Rare Species*

- Completion of a botanical survey for Long's Bulrush (*Scirpus longyi*); and
- Continued coordination with and review by NHESP in accordance with the MESA.

*Climate Change Adaptation and Resiliency*

- Continued use of "drop and lop" vegetation management technique in proximity to the Neponset River to avoid blocking the channels and to minimize wood debris floating onto the airport during flood events;
- Designing the stormwater management system for storm events and peak precipitation values derived from the upper confidence interval times a factor of 0.9 of the NOAA 14 precipitation frequency atlas to account for future increase in rainfall quantities and frequency;
- Use of native (drought tolerant) plant seed mix for the upland grassy areas and native wetland plants within the wetland replication area; and
- Continued evaluation and/or implementation of the following measures: installation of solar power, updating existing buildings to current building codes, incorporating green

infrastructure into parking lot layouts, and elevating critical infrastructure above the base flood elevation.

*Construction Period*

- Development of a Construction Period Traffic Management Plan which will identify designated truck routes;
- Development of a noise mitigation plan that will identify allowable construction hours (anticipated 7:00 AM to 5:00 PM);
- Comply with MassDEP's Air Pollution Control regulations at 310 CMR 7.00, including anti-idling provisions;
- Use of dust control measures (wetting agents, covering soil stockpiles, use of vehicle tracking pads and street sweeping) to reduce fugitive dust emissions;
- Compliance with MassDEP's Clean Construction Equipment Initiative aimed at reducing air emissions and encouraging contractors to use Low Sulfur Diesel fuel or Ultra-Low Sulfur Diesel Fuel;
- Use of sedimentation and erosion controls in compliance with the requirements of the SMS and the NPDES General Permit for Construction Activities, including development and implementation of a Stormwater Pollution Prevention Plan (SWPP); and,
- Maximizing the use of recycled asphalt and compliance with MassDEP's Solid Waste regulations.

Conclusion

Based on a review of the EENF, Single EIR, comment letters, and consultation with State Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. The project may proceed to permitting. State Agencies and the Proponent should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12. As noted, if subsequent consultation results in a finding of a "Take" of state-listed species, an NPC should be filed. Additionally, to the extent that the project design undergoes further material changes during the permitting process as compared to those disclosed in this filing, the Proponent should consult with the MEPA Office to determine the need for additional MEPA review in the form of a NPC.

August 16, 2021

Date



Kathleen A. Theoharides

Comments received:

08/06/2021	Department of Energy Resources (DOER)
08/09/2021	Natural Heritage and Endangered Species Program (NHESP)
08/09/2021	Massachusetts Department of Environmental Protection (MassDEP)/Southeast Regional Office (SERO)



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF  
ENERGY AND ENVIRONMENTAL AFFAIRS  
**DEPARTMENT OF ENERGY RESOURCES**  
100 CAMBRIDGE ST., SUITE 1020  
BOSTON, MA 02114  
Telephone: 617-626-7300  
Facsimile: 617-727-0030

**Charles D. Baker**  
Governor

**Karyn E. Polito**  
Lt. Governor

**Kathleen A.  
Theoharides**  
Secretary

**Patrick Woodcock**  
Commissioner

6 August 2021

Kathleen Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
100 Cambridge Street  
Boston, Massachusetts 02114  
Attn: MEPA Unit

RE: Norwood Memorial Airport, Norwood, Massachusetts, EEA #15208

Cc: Maggie McCarey, Director of Energy Efficiency, Department of Energy Resource  
Patrick Woodcock, Commissioner, Department of Energy Resources

Dear Secretary Theoharides:

We've reviewed the Single Environmental Impact Form (SEIR), for the above facility. The site contains approximately 170,733-sf of built space including and administrative building, a flight school, maintenance facilities, aircraft hangers, ATCT and fuel storage facilities. The purpose of this letter is to present strategies to establish a baseline for building energy usage and introduce strategies for energy efficient buildings the airport can incorporate on future projects. Recommendations to consider are as follows:

### **Building Energy Use**

As stated above, the airport contains approximately 170,733-sf of built space. It would be useful to estimate gas, electric, and other energy use for these buildings to estimate total energy use. For the buildings that are space conditioned, estimate energy use per square foot of conditioned space. These data can be estimated annually and trended over time with the objective of evaluating progress toward reducing energy use on a per area basis.

### **Building Emissions**

Similarly, it would also be useful to estimate total building emissions, and trend building emissions over time, both total and on a per area basis. For building electric power, use an electric grid

emission rate of 633 lbs/MWhr for the year 2019<sup>1</sup>. With the addition of renewables into the Massachusetts grid, electric grid emission rates are expected to decline to 200 lbs/MWhr by 2050. Accordingly, when contemplating maintenance, new construction and renovations, it would be useful to evaluate potential efficiency measures and heating options in terms of reduced emissions, not just reduced total energy. Consider, also, how electric grid emission rates are expected to decline when choosing efficiency strategies, and target fossil fuel reduction.

## **Key Emission Reduction Strategies**

Key emission reduction strategies are as follows:

### Envelope, Heat Recovery, and Solar Gains

The combination of quality envelope, heat recovery, and management of solar gains can result in significant reduction in heating (and cooling) thermal energy demand intensity (TEDI, units of kBtu/sf-yr)<sup>2</sup>. In addition to reduced utility costs and emissions, the value of a targeted focus on heating and cooling TEDI results in:

- Simplified space heating electrification;
- Reduction, and possible elimination, of perimeter heating systems;
- Improved resiliency;
- Reduced peak demands;
- Improved occupant comfort;
- Reduced maintenance.

Specific TEDI reduction strategies are:

- High-performance window and walls;
- Thermal-broken windows and components to eliminate thermal bridges;
- Low air-infiltration;
- Ventilation heat recovery;
- Solar gain management via external shading and/or low solar heat gain coefficient (SHGC)

Buildings with curtain wall envelope require high performing windows and high performing opaque spandrels to achieve heating TEDI reductions. High performing windows and high performing opaque spandrels should be carefully evaluated if curtain-wall construction is considered.

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<sup>1</sup> [https://www.iso-ne.com/static-assets/documents/2021/03/2019\\_air\\_emissions\\_report.pdf](https://www.iso-ne.com/static-assets/documents/2021/03/2019_air_emissions_report.pdf)

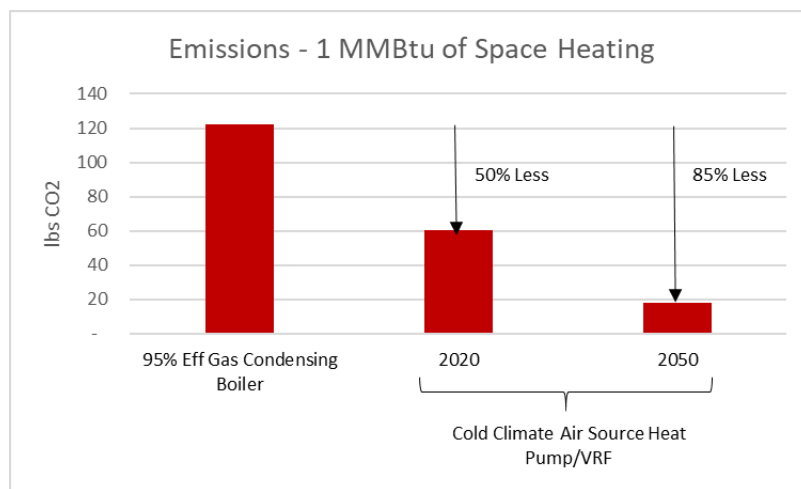
<sup>2</sup> Although they have the same units, heating and cooling TEDI is not the same as heating and cooling EUI. TEDI represents energy requirement, or demand, not energy consumption. For guidance on how to extract TEDI information from building models see “Energy Modeling Guidelines”, City of Vancouver, Planning, Urban Design and Sustainability Department, Land Use Development and Policy Guidelines, Version 2.0, amended 18 July 2018 and “Designing to TEDI, TEUI, and GHGI Performance Metrics”, International Building Performance Simulation Association (IBPSA), by Chan *et al*

### Efficient Electrification – Space and Water Heating

Efficient electrification of space and water heating entails the swapping of fossil fuels (natural gas, oil, and propane), or electric resistance systems, with cold-climate rated air source heat pumps, ground source heat pumps, and/or solar hot water heaters.

Electrification of space heating is a key mitigation strategy with significant short- and long-term implications on GHG emissions. Massachusetts grid emissions rates continue to decline with the implementation of clean energy policies that increase renewable electricity sources. The implication is that efficient electric space heating with cold climate air source heat pump (or ground source heat pump) has lower emissions than other fossil-fuel based heating options, including best-in-class (95% efficient) condensing natural gas equipment.

Currently, efficient electric heating has approximately **50% lower emissions** in Massachusetts than condensing natural gas heating. By 2050, and possibly sooner, efficient electric heating is expected to have approximately **85% lower emissions** in Massachusetts than condensing natural gas heating. See illustration below.



### Efficient Electric Space Heating

Efficient electrification of space heating is a readily possible for most building types using one or a combination of the following strategies:

- Air source heat pumps,
- Variable refrigerant flow (VRF) heat pumps systems,
- Ground source heat pumps,
- Central air to water heat pump serving hot water loop.

Additionally, these systems combine space heating and cooling into a single system simplifying HVAC equipment and maintenance.

### Efficient Electric Water Heating

Packaged heat pump service water heating are feasible for most building types and are commonly used throughout the Commonwealth. These are easily swapped with existing packaged fossil fuel service water heaters and should be considered when replacing existing fossil fuel systems.

Other strategies include centrally located air source water heating, these systems consist of centrally located air source heat pumps, usually with the compressors outdoors, which provide hot water to water distribution piping to the end use locations. These are usually engineered solutions with less packaged equipment options.

### Solar PV

Building code now requires PV readiness for 40% of the roof of most low-rise buildings. When planning new buildings, consider expanding this minimum PV readiness to 80-90%. This can be done by avoiding or consolidating rooftop equipment to one area of the roof in order to maximize unobstructed rooftop.

### Electric Vehicle (EV) Ready Parking Spaces

EV charging stations are critical for the continual transition towards electric mobility. Even if EV charging stations are not installed during construction, it is critical to maximize EV-ready spaces as it is significantly cheaper and easier to size electrical service and install wiring or wiring conduit during construction, rather than retrofitting a project later.

## **Incentives**

Buildings which incorporate the above strategies can qualify for significant incentives:

- MassSave® performance-based incentives<sup>3</sup> offer incentives for every kWh or therm saved compared to a program-provided energy model. The above energy efficiency strategies offer opportunities for large kWh and therm savings.
- Alternative Energy Credits (AECs)<sup>4</sup> offer incentives to electrify building space heating using heat pumps and/or VRF. This program also includes multipliers which increase value if the building meets Passivehouse standards or buildings built to HERs 50 or less. These credits may be distributed on a quarterly basis over time; or, may be distributed in a lump sum to the developer if certain conditions are met.
- Massachusetts SMART program<sup>5</sup> provides significant incentives for solar development on top of federal and state tax incentives. SMART includes pathways which allow solar production to be sold without off-takers. This may be of potential interest to building

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<sup>3</sup> <https://www.masssave.com/en/saving/business-rebates/new-buildings-and-major-renovations/>

<sup>4</sup> <https://www.mass.gov/guides/aps-renewable-thermal-statement-of-qualification-application>

<sup>5</sup> <https://www.mass.gov/solar-massachusetts-renewable-target-smart>



Norwood Memorial Airport EEA #15208  
Norwood, Massachusetts

developers as this allows them to develop rooftop solar without necessarily engaging with building tenants. For this reason, setting aside rooftop solar PV areas helps ensure that building owners' ability to monetize the roof is not impacted.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Ormond', enclosed within a thin black rectangular border.

Paul F. Ormond, P.E.  
Energy Efficiency Engineer  
Massachusetts Department of Energy Resources

A handwritten signature in black ink, appearing to read 'B. Place', enclosed within a thin black rectangular border.

Brendan Place  
Clean Energy Engineer  
Massachusetts Department of Energy  
Resource



## Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Kathleen A. Theoharides  
Secretary

Martin Suuberg  
Commissioner

August 9, 2021

Kathleen A. Theoharides  
Secretary of Environment and Energy  
ATTN: MEPA Office  
Executive Office of Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: SEIR Review EOEEA # 15208.  
NORWOOD. Norwood Memorial Airport  
Taxiway Realignment at 125 Access Road

Dear Secretary Theoharides,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Single Environmental Impact Report (SEIR) for the proposed Norwood Memorial Airport Taxiway Realignment at 125 Access Road, Norwood, Massachusetts for the proposed (EOEEA # 15208). The Project Proponent provides the following information for the project:

**“The Norwood Airport Commission proposes to relocate sections of taxiways (Taxiways A and D) from the apron area to the main runway (Runway 17-35) to avoid direct access to a runway in compliance with FAA safety standards. The project also includes the proposed realignment of Taxiway A to meet standards for runway/taxiway intersections. The project site is located in the Fowl Meadow and Ponkapoag Bog Area of Critical Environmental Concern (ACEC) and will result in impacts to 39,000 sf of Bordering Vegetated Wetlands (BVW). Permits listed in the ENF to be sought for the project include the following:**

**Variance under the Wetlands Protection Act (MassDEP)  
Section 401 Water Quality Certification (MassDEP)”**

### ***Bureau of Water Resources (BWR) Comments***

#### **Boston Wetlands Program.**

1. A Variance to the Massachusetts Wetlands Protection Act (MWPA) regulations is required pursuant to 310 CMR 10.05(10) to authorize the activities that do not meet the MWPA performance standards for bordering vegetated wetlands (BVW) (310 CMR 10.55(4)). The Variance application must provide a description of alternatives explored that would allow the Project to proceed in compliance with 310 CMR 10.21 through 10.60 and an explanation of why each is unreasonable; a description of the measures to be used to contribute to the protection of the interests identified in the MWPA (M.G.L. c. 131 § 40); and evidence of an

overriding public interest associated with the Project which justifies waiver of 310 CMR 10.21 through 10.60.

2. A Water Quality Certification (WQC) for Major Fill/Excavation (BRP WW 10) is required because the Project is proposed to result in the loss of more than 5000 square feet cumulatively of BVW and land under water (LUW) (314 CMR 9.04(1)).
3. When Federal Aviation Administration (FAA) requirement(s) preclude the design from meeting the requirements of the MWPA regulations, the narrative must state the FAA requirement(s) and what part(s) of the design cannot meet the MWPA regulations.
4. The Applicant must demonstrate that all efforts have been made to avoid adverse impacts to BVW. When avoidance is not possible, demonstration must be made that the impacts have been minimized and that unavoidable impacts have been mitigated. The applicant has proposed a 2:1 mitigation to impact ratio for BVW replacement
5. Compensatory flood storage is a volume not previously used for flood storage and shall be incrementally equal to the theoretical volume of flood water at each elevation. The elevation of the ground surface alone does not determine the volume that can be provided, because the water surface controls what can be provided incrementally at each elevation. The Applicant must demonstrate that seasonal high groundwater is at or below the elevation which the compensatory flood storage will be provided.
6. The Applicant shall demonstrate that the proposed compensatory flood storage has an unrestricted hydraulic connection to same waterway or water body displaced by the Project as stated in 310 CMR 10.57(4)(a)(1).
7. The proposed Taxiway C realignment design will presumably require a stream crossing that is not yet included in the plans. All new stream crossings must comply with 310 CMR 10.54(4)(a)(6) and 10.56(4)(a)(5).
8. MassDEP recommends designing the peak rate attenuation practices required by 310 CMR 10.05(6)(k)2. using the upper confidence interval times, a factor of 0.9 of the National Oceanic and Atmospheric Administration (NOAA) 14 precipitation frequency atlas instead of precipitation estimates from Technical Paper-40 (TP-40) to address resiliency comments in the Certificate of the Secretary of Energy and Environmental Affairs on the Expanded Notice of Project Change dated December 21, 2020. The Secretary's certificate states "the Single EIR should identify site elements that will be designed to minimize impacts associated with more frequent and intense storms and extreme heat waves including, but not limited to "... stormwater management system design that will accommodate rainfall under projected climate conditions." The MWPA regulations design storms rely on the precipitation estimates from TP-40, which was published in 1961 and does not reflect current or future precipitation estimates. Using the upper confidence of NOAA-14 times a factor of 0.9 reflects the range of current observed storms. To calculate the NOAA-14 PLUS precipitation frequency:

- a. Navigate to NOAA-14 Web Site  
[https://hdsc.nws.noaa.gov/hdsc/pfds/pfds\\_map\\_cont.html?bkmrk=ma](https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=ma)
  - b. Navigate to “point-of-interest,” Norwood Memorial Airport is listed as one of the stations (“NORWOOD MEM AP (19-6012)”), tabular results will appear below the map.
  - c. Multiply 0.9 by the NOAA Upper Confidence. Example for the 2-year 24-hour storm at the NORWOOD MEM AP station, the upper confidence interval is 4.35. Multiply 4.35 by 0.9. NOAA PLUS for the 2-year 24-hour storm is 3.92 (round to 2 decimals).
9. MassDEP will require a demonstration that the Project meets the Massachusetts Stormwater Management Standards (310 CMR 10.05(6)(k)) onsite but may consider offsite stormwater mitigation if the applicant can demonstrate that onsite mitigation is not practicable. Offsite mitigation should be prioritized in the following order: 1) adjacent site, 2) same wetland system, 3) same town, and 4) same HUC12. MassDEP will require a demonstration that the offsite mitigation provides all remaining requirements of the Massachusetts Stormwater Management Standards cannot be mitigated onsite. The applicant is required to demonstrate compliance with all federal, state, and local requirements in accordance with 310 CMR 10.05(6)q., in particular the EPA MS4 General Permit. MassDEP will evaluate this further during Variance review.
  10. In accordance with 310 CMR 10.05(6)(k), 314 CMR 9.06(6)(a) and as further defined the Massachusetts Stormwater Handbook Volume 1 Chapter 2, MassDEP requires the use of structural BMPs that are consistent with the Total Maximum Daily Load (TMDL) for pathogens established for the Neponset River watershed. Pollution prevention is an interest identified in the MWPA and is therefore subject to jurisdiction under the MWPA. The TMDL may contain information on appropriate BMPs. See <http://mass.gov/dep/water/resources/tmdls.htm>. The MassDEP Wetlands Program recommends treatment practices that address both Total Suspended Solids (TSS) and fecal coliform, such as but not limited to, Environmentally Sensitive Site Design; Bioretention; Sand Filters; Organic Filters; Dry Wells, Infiltration trenches; Infiltration basins; porous pavements; and subsurface infiltrators.
  11. Stormwater Management Standard 8 (310 CMR 10.05(6)(k)8). requires that a plan to control construction related impacts including erosion, sedimentation, and other pollutant sources during construction and land disturbance activities (Construction Period erosion, sedimentation, and Pollution Prevention plan (CP/PP Plan)) be developed and implemented. The EPA Stormwater Pollution Prevention Plan (SWPPP) may serve as the CP/PP Plan, if it includes measures required to be in the CP/PP Plan in addition to the measures specifically required by the EPA Construction General Permit. The CP/PP Plan or SWPPP will need to be approved by MassDEP prior to the commencement of construction.
  12. Pavement removal should be addressed in the stormwater report for Standards 3 and 4 (310 CMR 10.05(6)(k)3. and 4., respectively). Credit for impervious reduction is available by indicating how much pavement is being removed and how much is being added. Details should include a plan demonstrating how the areas where the removed impervious surface

will be restored to simulate a natural landscape setting (i.e., BVW, Bordering Land Subject to Flooding, or upland).

13. The stormwater report must indicate what areas are new development and redevelopment in both plan view and numerically as a percentage of the project area. Each Stormwater Management Standard should clearly state how both new development and redevelopment comply with the Massachusetts Stormwater Management Standards (310 CMR 10.05(6)(k)).
14. The stormwater runoff design between the proposed Taxiway C realignment and existing runway 10-28 is not yet included in the plans. All stormwater discharges from this location must comply with the Massachusetts Stormwater Management Standards (310 CMR 10.05(6)(k)).

Underground Injection Control. The Section 61 Finding section of the SEIR does not acknowledge the possibility that UIC registration may be required with MassDEP for the conveyance of stormwater through its underground infiltration structures.

#### ***Bureau of Waste Site Cleanup (BWSC) Comments***

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

There are many BWSC disposal sites located in the vicinity of the proposed project area. Many of the sites have been closed under the MCP, but other BWSC disposal sites remain open, and require continued environmental response actions prior to closure under the MCP. A listing and discussion of the status of each of these MCP sites will not be presented here.

BWSC disposal sites located in the vicinity of the proposed Project area may be viewed using the MassGIS online data viewer (Oliver)

at: [http://maps.massgis.state.ma.us/map\\_ol/oliver.php](http://maps.massgis.state.ma.us/map_ol/oliver.php) Under “Available Data Layers” select “Regulated Areas”, and then “DEP Tier Classified 21E Sites”. Site status and reports for specific BWSC disposal sites may be found using the BWSC Waste Sites/Reportable Release Lookup at: <http://public.dep.state.ma.us/SearchableSites2/Search.aspx>

*The Project Proponent is advised that if oil and/or hazardous material are identified during the implementation of this Project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) must be made to MassDEP if necessary. A Licensed Site Professional (LSP) should be retained to determine if notification is required, and to render opinions as necessary. Please contact BWSC for guidance if questions arise regarding assessment and cleanup under the MCP.*

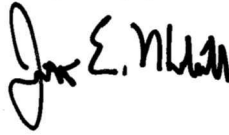
#### ***Bureau of Air and Waste (BAW) Comments***

The Project Proponent has adequately addressed the Department’s BAW’s comments.

***Other Comments/Guidance***

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this FEIR. If you have any questions regarding these comments, please contact George Zoto at (508) 946-2820.

Very truly yours,



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

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director

Gerard Martin, Acting Deputy Regional Director, BWR

John Handrahan, Acting Deputy Regional Director, BWSC

Seth Pickering, Deputy Regional Director, BAW

Jennifer Viveiros, Deputy Regional Director, ADMIN

Lealdon Langley, Director, Division of Watershed Management, BWR/Boston

Lisa Rhodes, Chief, Wetlands, BWR/ Boston

Daniel Padien, Chief, Waterways Boston

Thomas Gruszkos, 401 Water Quality Certification Program, BWR/Boston

Daniel Gilmore, Chief, Wetlands and Waterways

Joseph Cerutti, Underground Injection Control, BWR/Boston

Mark Dakers, Chief, Solid Waste Management, BWR

Elza Bystrom, Solid Waste Management, BWR

Allen Hemberger, Site Management



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## DIVISION OF FISHERIES & WILDLIFE

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August 9, 2021

Kathleen A. Theoharides, Secretary  
Executive Office of Energy and Environmental Affairs  
Attention: MEPA Office  
Alex Stryisky, EEA No. 15208  
100 Cambridge Street  
Boston, Massachusetts 02114

*Project Name:* Taxiway C Realignment and Runway Safety Area Project  
*Proponent:* Norwood Airport Commission  
*Location:* 111 Access Road, Norwood, MA  
*Project Description:* Realign and Relocate Taxiway C, Pave 300-foot long Safety Areas for Runway 17-35, Perimeter Fence Replacement  
*Document Reviewed:* Single Environmental Impact Report  
*EEA File Number:* 15208  
*NHESP Tracking No.:* 14-32982

Dear Secretary Theoharides,

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the Division) has reviewed the *Single Environmental Impact Report* (SEIR) for the proposed project at Norwood Memorial Airport and would like to offer the following comments.

As indicated in the *Massachusetts Natural Heritage Atlas* (15<sup>th</sup> Edition), a portion of the property is delineated as *Priority Habitat*. A portion of the proposed project will occur within *Priority Habitat* for Long's Bulrush (*Scirpus longii*), a species listed as "Threatened" pursuant to the Massachusetts Endangered Species Act (M.G.L. c. 131A) and its implementing regulations (MESA, 321 CMR 10.00). Therefore, the project requires a direct filing with the Division for compliance with the Massachusetts Endangered Species Act (MESA 321 CMR 10.00).

The MESA prohibits the Take of state-listed species, which is defined as "in reference to animals...harm...kill...disrupt the nesting, breeding, feeding or migratory activity...and in reference to plants...collect, pick, kill, transplant, cut or process...Disruption of nesting, breeding, feeding, or migratory activity may result from, but is not limited to, the modification, degradation, or destruction of Habitat" of state-listed species (321 CMR 10.02).

As noted in the SEIR, the Proponent has consulted with the Division regarding a survey for Long's Bulrush associated with the Runway Safety Area paving project. The botanical survey results are not yet available, thus the Division cannot yet fully evaluate whether the project will have direct or indirect impacts to state-listed species and their habitats. In order to inform the Division's review relative to state-listed species and their habitats, the Division must receive and review the botanical survey results with a project plan

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identifying the proposed Limits of Work for the project, inclusive of all grading, staging, stockpiling, vegetation clearing, and all wetland resource areas delineated.

The SIER identifies project modifications since the NPC was filed, including replacement of the airport perimeter fence. We strongly recommend that the Proponent initiate pre-filing consultations with the Division regarding the perimeter fence replacement to proactively address potential MESA review requirements. At this time, it is not clear whether the projects identified in the SEIR will result in a Take (321 CMR 10.18(2)(b)) of state-listed species. The Division anticipates working with the Proponent to resolve concerns for state-listed species and their habitats associated with the project through the MESA review process (321 CMR 10.18, 10.23).

Although it may be possible for the projects detailed in the SEIR to avoid a Take of state-listed species, the Division notes that projects resulting in a Take of state-listed species may only be permitted if they meet the performance standards for a Conservation and Management Permit (CMP; 321 CMR 10.23). In order for a project to qualify for a CMP, the applicant must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species. If the Project is determined to result in a Take and requires a CMP to proceed, the Division will not render a final decision until the MEPA review process and its associated public and agency comment period is complete.

As our MESA review is not complete, no alteration to the soil, surface, or vegetation and no work associated with the proposed project shall occur on the property until the Division has made a final determination.

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

Sincerely,



Everose Schlüter, Ph.D.  
Assistant Director

cc: Alyssa Jacobs, Epsilon Associates  
Norwood Airport Commission  
Norwood Board of Selectmen  
Norwood Conservation Commission  
Norwood Planning Department  
DEP Southeast Regional Office, MEPA