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April 17, 2026

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

Project Name	: Reconstruct and Extend Runway 16-34 and Construct New Taxiway E
Project Municipality	: Beverly, Danvers, and Wenham
Project Watershed	: North Coastal and Ipswich River
EEA Number	: 17047
Project Proponent	: Beverly Airport Commission
Date Noticed in Monitor	: February 25, 2026

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.06 of the MEPA Regulations (301 CMR 11.00), I have reviewed the Expanded Environmental Notification Form (EENF), and hereby determine that this project **requires** the submission of an Environmental Impact Report (EIR). In accordance with Section 11.06(8) of the MEPA regulations, the Proponent requested that I allow a Single EIR to be submitted in lieu of the usual two-stage Draft and Final EIR process. I hereby grant the request to file a Single EIR, which the Proponent should submit in accordance with the Scope included in this Certificate.

Project Description

As described in the EENF, the project includes construction of airfield improvements at the Beverly Regional Airport to address safety and operational deficiencies identified in its 2022 Airport Master Plan.[1] The airport's main runway, Runway 16-34, will undergo full-depth reconstruction and will be extended by 600 feet (ft) (from 5,001 ft to 5,601 ft) by paving the existing 300-ft Runway Safety Areas (RSAs) at both ends of the runway. According to the EENF, the runway extension will provide an additional 300 ft of runway length for planes to take-off from both ends of Runway 16-34; however, it does not alter the landing configuration of the runway, which is determined in part by vertical clearances on the approaches to the runway that are not proposed to be modified. Taxiway E, which is located east of and parallel to the southern

[1] The Master Plan is available for download at https://beverlyairport.com/documents/

section of Runway 16-34, will be extended for a distance of approximately 3,000 ft to the northern end of the runway. Three new short taxiways will be constructed along the new section of Taxiway E to provide connections from Taxiway E to Runway 16-34, including Taxiway E5 near the middle of Taxiway E and Taxiways E6 and E7 at the proposed northern end of Runway 16-34. In addition, a 550-ft by 400-ft area north of Runway 16-34, and the area extending 200 ft from the center line (400 ft total) of Runway 16-34, will be regraded to provide unpaved RSAs and provide a smooth ground surface free of obstructions. A privately-owned 0.2-acre parcel along the north side of Runway 16-34 will be acquired to facilitate construction of Taxiway E and regrading of the area.[2] The project also includes construction of a new stormwater management system, new runway signage and lighting, marking and grooving, and installation of a new Precision Approach Path Indicator (PAPI) system at the southern end of Runway 16-34 to provide a visual guide for approaching aircraft.

The project components detailed in the EENF were identified for near term implementation in the 2022 Airport Master Plan and are needed to enhance safety and better meet the needs of the existing design aircraft. The 2022 Master Plan was prepared when Runway 16-34 had a Runway Design Code (RDC) of B-II. The B-II design aircraft is a Cessna Citation Latitude, which has a maximum takeoff weight of 30,800 pounds (lbs). Based on the application of FAA design criteria to the specific characteristics of the Beverly Regional Airport, Runway 16-34 should be 5,351 to 7,851 linear feet (lf) long (an increase of at least 351 ft compared to the existing length of 5,001 ft) to be consistent with RDC B-II design standards; the proposed extension of the runway to 5,601 lf would therefore meet the B-II runway length standard. In 2025, after the Master Plan was complete and the design for Runway 16-34 was initiated, the FAA determined that the designation of Runway 16-34 should change to RDC C-II, with the Challenger 300 as the design aircraft (maximum takeoff weight of 38,500 lbs.). The FAA's determination was based on a finding that there were 744 itinerant flight operations by Challenger 300 class of aircraft in 2024, which exceeds the threshold of 500 or more itinerant flights by an aircraft class larger than the existing design aircraft of a runway at which FAA reclassifies a runway. According to the EENF, under FAA design guidelines for RDC C-II runways, the minimum length of Runway 16-34 should be at least 5,739 lf. According to the EENF, due to the timing of the change in the RDC designation relative to planning and design of the project, the FAA has allowed the Proponent to extend Runway 16-34 to the proposed length of 5,601 ft (which meets B-II design standards), with commencement of additional analysis by the Proponent in two to three years to assess the feasibility of further extending Runway 16-34 to meet C-II requirements; as detailed below, the Single EIR should identify any state or federal environmental reviews of future changes to the runway to accommodate the C-II design standard. The proposed length of the runway will exceed the minimum runway length for RDC B-II (5,351 ft); as noted above, the project will provide added runway length for take-offs, which is critical due to the heavier weight of aircraft when taking off than landing, and will make operations safer for all aircraft.

According to the EENF, expansion of the existing RSAs around Runway 16-34 was not necessary when the runway was designated as a B-II classification because the existing RSAs meet the B-II standard (150 ft wide by 300 ft long). However, the standard RSA for C-II runways

[2] According to the project description included in the EENF, the parcel to be acquired is located in Beverly. However, Figure 2 in the EENF shows the parcel as being in Wenham. This should be clarified in the Single EIR.

is 400 ft wide (i.e., extending 200 feet from the runway centerline) along the length of the runway and 1,000 ft long (beyond the end of each runway). The project will meet the required 400-ft RSA width along the runway; however, as with the runway length, the FAA will not require full compliance with the RSA dimensions for C-II runways at this time due to the presence of wetlands south of Runway 16-34 and the proximity of the Airport property line to the northern end of Runway 16-34. The project will clear a 550-ft by 400-ft area to extend the RSA north of Runway 16-34; because the runway extension will facilitate only take-off, the two existing 300-ft RSAs at both end of the runway that are proposed to be paved will continue to serve as RSAs for landing aircraft. According to the EENF, taxiways parallel to the full-length runways are required by the FAA regardless of the applicable RDC; therefore, the extension of Taxiway E as proposed in the EENF was part of the project design even before the change in the runway designation.

According to the EENF, the project has been designed to serve existing aircraft operations and will not increase the Airport's overall operating capacity. According to the EENF, FAA defines airport capacity as "the number of arrivals and departures that an airport can safely handle." The 2022 Master Plan described Visual Flight Rule (VFR) and Instrument Flight Rule (IFR) hourly capacities as being dependent on a number of factors, including runway use configuration, percent arrivals, percent of touch and go's, taxiway characteristics, airspace limitations, runway instrumentation, and the mix of aircraft currently using the Airport. Based on these factors, the 2022 Master Plan reported that the Airport had a VFR capacity of 98 operations per hour and an IFR capacity of 59 operations per hour, or an Annual Service Volume (ASV) of up to a total of 230,000 annual operations. The 2022 Master Plan projected that flight operations would increase from 66,949 (29.1% of capacity) in 2019 to 83,571 (36.3% of capacity) in 2039 based on a medium growth projection of 1.1% compound annual growth rate (CAGR). According to the EENF, FAA guidelines recommend that planning for capacity improvements should start when an airport reaches 60% of the ASV and that construction of capacity improvements should begin when the airport reaches 80% of ASV. According to the EENF, planning for additional airport capacity will not be required for the 20-year planning period of the 2022 Master Plan (2019-2039) because flight operations at the Airport will not exceed 60% of the ASV during this period. According to the EENF, even if a master plan developed for an airport were to project increases in operations or changes in the types of aircraft using the airport, it would not be eligible for funding to implement design changes until the FAA finds that the existing use patterns of the airport necessitate such changes.

According to the EENF, the 2022 Master Plan identified the additional projects below; however, they have not been funded or designed, and there is no schedule for their implementation:

- Short-term projects: Construct hangar building(s) and apron(s);
- Intermediate term projects: Taxiway B relocation; Perimeter road construction; and Construct hangar building(s) and apron(s);
- Long-term projects (2031-2040): Reconstruct Runway 9-27; Construct hangar building(s) and apron(s); Relocate Taxiway D; Construct Taxiway J

Ongoing maintenance efforts at the Airport include:

- Removal and mitigation of airspace obstructions are required and in accordance with the approved vegetation management plan and applicable regulations;
- Upgrading and maintaining visual aids as required by the FAA;
- Replacing airfield equipment;
- Maintaining existing fencing and internal roadways; and
- Maintaining or resurfacing pavement on runways and taxiways in accordance with observed conditions and maintenance standards.

According to the EENF, further extension of Runway 16-34 or its associated RSA would likely result in additional on-site and off-site wetlands impacts and land alteration that would meet or exceed MEPA review thresholds. The potential future projects listed above would be constructed within areas of existing impervious area but may cumulatively meet or exceed a MEPA review threshold. The Single EIR should clarify the potential time periods for future projects, and indicate the potential for MEPA review for projects proceeding within at least the next five years. The Single EIR should also clarify what future reviews or permitting is anticipated for further extension of Runway 16-34 and its RSA and if such expansions may facilitate an increase in aircraft operations and traffic.

Project Site

The Beverly Regional Airport, which is owned by the City of Beverly, covers an area of approximately 470 acres in Beverly, Danvers, and Wenham. It is bordered to the northeast by undeveloped forestland, to the east by a residential neighborhood, to the south by an industrial park and a residential neighborhood, and to the west and northwest by residential neighborhoods. It was constructed in 1928 and served national security purposes during World War II. It was decommissioned by the Navy in 1945 and its ownership was transferred to the City of Beverly in 1950. Project activities are proposed in a 70.63-acre area in the eastern part of the Airport, including 57.53 acres in Beverly, 12.85 acres in Wenham, and 0.25 acres in Danvers.

According to the EENF, Beverly Regional Municipal Airport is classified by the FAA as a General Aviation Regional Reliever Airport. The 2010 Massachusetts Statewide Airport System Plan prepared by the Massachusetts Department of Transportation (MassDOT) Aeronautics Division designated the Airport as a Corporate/Business airport that serves a primary role in regional economic activities and accommodates most types of general aviation aircraft, including corporate jet and multi-engine aircraft. Aviation providers located at the Airport include one Fixed Base Operator (FBO), two flight schools, an aircraft management service, an aircraft maintenance service, and several based and transient aircraft storage providers (tie-downs and hangars). Facilities at the Airport include:

- Runway 16-34 (which is proposed to be extended) is a 5,001-ft long, 100-ft wide paved runway oriented in a northwest-southeast alignment
- Runway 9-27 is a 4,755-ft long, 100-ft wide paved runway oriented in an east-west alignment. It intersects the southern end of Runway 16-34.
- Eight taxiways designated with letters A through H which range from 35 to 50 ft in

width. Taxiway E, which is proposed to be extended, is approximately 2,000- ft long and runs parallel to and east of the southern section of Runway 16-34

- Two clusters of buildings and apron space known as the East Side Development Area and West Side Development Area include buildings used by airport administration, FAA staff, and aviation providers, including hangars, and paved aprons for aircraft tie-downs

According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, the Airport is not located within the 100-year floodplain. Wetland resource areas subject to jurisdiction under the Wetlands Protection Act at the project site include Bordering Vegetated Wetlands (BVW) and Bank associated with an intermittent stream. The project site also includes Isolated Vegetated Wetlands (IVW) located in Beverly and Wareham which are protected under local bylaws. Most of the 70.63-acre project site is located within an area mapped as an Outstanding Resource Water (ORW) associated with Wenham Lake, which is a public water supply reservoir managed by the Salem-Beverly Water Supply Board.

The project site is located within an Environmental Justice (EJ) Population designated as Income located in Beverly. There are no other EJ populations within one mile of the project site. The project site is within five miles of 49 additional EJ populations located in Beverly, Danvers, Hamilton, Peabody, and Salem, including 22 designated as Minority, 12 designated as Income, two designated as English Isolation, ten designated as Minority and Income, two designated as Minority and English Isolation, and one designated as Minority, Income, and English Isolation. According to the EENF, the designated geographic area (DGA) for the project is one mile.

Environmental Impacts and Mitigation

Potential environmental impacts include alteration of 70.63 acres of land, including 14.3 acres of existing pavement on Runway 16-34, 54.93 acres of unpaved areas maintained as a grassed infield, 1.08 acres of forested from which trees will be removed, and 0.32 acres (13,800 sf) of IVW jurisdictional pursuant to a Town of Wenham Bylaw but not under state or federal laws. In addition, the project will create 5.13 acres of impervious area.

The purpose of the project is to address safety and operational concerns identified in the 2022 Master Plan. Measures to avoid, minimize, and mitigate environmental impacts include construction of a new stormwater management system; development of a project design which avoids direct impacts to BVW; mitigation for impacts to IVW to be specified during permitting; and implementation of measures to minimize construction-period impacts, such dust controls. Final mitigation measures should be presented in the Single EIR.

Jurisdiction and Permitting

This project is subject to MEPA review and preparation of a mandatory EIR pursuant to 310 CMR 11.03(1)(a)(1), Direct alteration of 50 or more acres of land.[3] The project also meets or

[3]The EENF indicated that the project does not result in "New" land alteration and therefore does not meet the mandatory EIR threshold for 50 or more acres of land at 301 CMR 11.03(1)(a)(1). New ENF forms effective February 3, 2026 require that any proposed land alteration (including alteration within a previously altered area) be

exceeds the following ENF thresholds: 301 CMR 11.03(1)(b)(2), Creation of five or more acres of impervious area; 301 CMR 11.03(6)(b)(3), Expansion of an existing runway at an airport; and 301 CMR 11.03(6)(b)(4), Construction of a New taxiway at an airport. The project is also required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within the DGA (as defined in 301 CMR 11.02) around one or more EJ populations.

The project requires Orders of Conditions (OOCs) from the Beverly Conservation Commission pursuant to the Wetlands Protection Act (or in the case of an appeal of the OOC, a Superseding Order of Conditions from MassDEP) and the Beverly Wetlands Protection Ordinance, and the Wenham Conservation Commission pursuant to the Wenham Water Resources Protection Bylaw. The project will undergo review pursuant to the National Environmental Policy Act (NEPA) and requires a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA).

The project will receive Financial Assistance from MassDOT's Airport Improvement Program (AIP). Therefore, MEPA jurisdiction is broad in scope and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in MEPA regulations.

Request for Single EIR

The EENF included a request that I allow a Single EIR in accordance with 301 CMR 11.06(8). The MEPA regulations at 301 CMR 11.06(8) indicate that a Single EIR may be allowed provided I find that the EENF:

> a. describes and analyzes all aspects of the project and all feasible alternatives, regardless of any jurisdictional or other limitation that may apply to the Scope;
> b. provides a detailed baseline in relation to which potential environmental impacts and mitigation measures can be assessed; and,
> c. demonstrates that the planning and design of the project use all feasible means to avoid potential environmental impacts.

To support a Single EIR request for any project for which an EIR is required in accordance with 301 CMR 11.06(7)(b), I must also find that the EENF:

> d. describes and analyzes all aspects of the project that may affect Environmental Justice Populations located in whole or in part within the Designated Geographic Area around the project; describes measures taken to provide meaningful opportunities for public involvement by Environmental Justice Populations prior to filing the expanded ENF, including any changes made to the project to address concerns raised by or on behalf of Environmental Justice Populations; and provides a

included in the land alteration calculation for the purpose of determining applicable review thresholds. Because the EENF was filed during the transitional period between ENF forms, the filing was accepted for review with the previous ENF form. However, the EENF as filed correctly acknowledged that the project is subject to an EIR due to its proximity to EJ populations.

> detailed baseline in relation to any existing unfair or inequitable Environmental Burden and related public health consequences impacting Environmental Justice Populations in accordance with 301 CMR 11.07(6)(n)1.

Consistent with this request, the EENF was subject to an extended comment period under 301 CMR 11.05(9). For the reasons stated below, I hereby grant the request for Single EIR.

Review of the EENF

The EENF provided a description of existing and proposed conditions, preliminary project plans, and an identification of measures to avoid, minimize and mitigate project impacts. Consistent with the MEPA Interim Protocol on Climate Change Adaptation and Resiliency, the EENF contained an output report from the 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. On April 3, 2026, the Proponent circulated additional details in response to questions raised during the consultation session, as summarized below. For purposes of clarity, all supplemental materials provided by the Proponent are included in references to the "EENF," unless otherwise indicated.

Alternatives Analysis

The EENF included an alternatives analysis which reviewed a No Build Alternative and alternative designs for the reconstruction and extension of Runway 16-34. According to the EENF, the No Build Alternatives were not selected because they would not meet the project purpose, as summarized above, which includes reconstruction of Runway 16-34, which has exceeded it 20-year design life, and other airfield modifications consistent with FAA guidelines for safety and operations. Alternatives to Taxiway E and the three proposed spur taxiways were not evaluated because no other designs would meet FAA requirements; however, given the location of the proposed spur taxiways within the ORW, the Single EIR should review of the need for three spur taxiways and evaluate alternatives which minimize new impervious area.

Environmental Justice / Public Health

The project site is located within an EJ Population designated as Income located in Beverly, and within five miles of 49 additional EJ populations, including 22 designated as Minority, 12 designated as Income, two designated as English Isolation, ten designated as Minority and Income, two designated as Minority and English Isolation, and one designated as Minority, Income, and English Isolation. There are no languages identified as those spoken by 5% of more of residents with LEP within one mile of the project site.

Effective January 1, 2022, all new projects in "Designated Geographic Areas" ("DGA," as defined in 301 CMR 11.02, as amended) around EJ populations are subject to new requirements imposed by the Chapter 8 of the Acts of 2021: An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (the "Climate Roadmap Map") and amended MEPA regulations at 301 CMR 11.00. Two related MEPA protocols—the MEPA Public Involvement

[4] See https://resilientma.org/rmat_home/designstandards/

Protocol for Environmental Justice populations (the "MEPA EJ Public Involvement Protocol") and MEPA Interim Protocol for Analysis of project Impacts on Environmental Justice populations (the "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

Prior to filing the EENF, the Proponent provided advance notification of the project to a list of project-specific community-based organizations (CBOs) and tribes/indigenous organizations (the "EJ Distribution List") developed by the Proponent from a list provided by the MEPA Office. The EJ Screening Form, including a project fact sheet was distributed to the EJ Distribution List, and posted at community locations within and adjacent to the EJ population within the DGA and on the project website.[5] The EJ Screening Form provided information on ways to request a community meeting; however, according to the Proponent, no meetings were requested in response to the EJ Screening Form. A remote MEPA consultation session was held at 6:00 PM on March 11, 2026. Notice of the MEPA remote consultation session was distributed to the EJ Reference List. The consultation session was attended by representatives of the Town of Wenham Conservation Commission, the project team, and the MEPA Office. Questions posed by meeting attendees focused on alternative designs that would minimize impacts to IVW, mitigation for IVW impacts, potential impacts on water quality, and future projects that may be implemented at the airport. Supplemental information prepared and distributed by the Proponent included responses to questions raised during the consultation session is incorporated into the review of the project and the Scope for the Single EIR. As detailed below, the Single EIR should describe ongoing public engagement that will be conducted by the Proponent, and plans for how community engagement will be maintained in the planning for future phases.

Enhanced Analysis

The EENF contained a baseline assessment of any existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ populations in accordance with 301 CMR 11.07(6)(n)1 and, in part, 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.[6] None of the census tracts within the DGA meet any vulnerable EJ health criteria. At the community level, the City of Beverly meets the criteria for Heart Attack Hospitalizations; however, no other criteria are met or exceeded by any of the three municipalities in the DGA.

[5] https://www.gza.com/beverly-regional-airport-reconstruct-and-extend-runway-16-34-and-construct-new-taxiway-e-project

[6] See https://matracking.ehs.state.ma.us/Environmental-Data/ej-vulnerable-health/environmental-justice.html. Four vulnerable health EJ criteria are tracked in the DPH EJ Viewer, which are tracked on a municipal level. Two indicators (childhood blood lead, and low birth weight) are also tracked on a census tract level.

The EENF 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: 3
- M.G.L. c. 21E sites: 2
- Tier II toxic use reporting facilities: 8
- MassDEP Sites with Activity and Use Limitations (AULs): 5
- Underground storage tanks: 3
- EPA facilities: 1
- Energy generation and supply facilities: 1
- Road infrastructure: Routes 35, 97, and 128

According to the output report from the MA Resilience Design Tool included in the EENF, the project site has a high exposure to stormwater flooding due to extreme precipitation, and to extreme heat, and moderate exposure to riverine flooding associated with extreme precipitation. EJ populations near the site are likely also exposed to these climate risks.

While the above indicators show some evidence of an existing "unfair or inequitable" burden impacting the identified EJ populations, the EENF asserted that the project will not have disproportionate adverse effects on EJ populations because the project has been designed to minimize impacts to environmental resources, and will not directly impact areas beyond the project site. As detailed below, the project includes construction and regrading within an area at the airport that is within a census tract containing EJ populations where per- and poly-fluoroalkyl substances (PFAS) have been detected in the groundwater; however, this area is currently being assessed to determine the appropriate remediation in accordance with the Massachusetts Contingency Plan (MCP). As detailed below, the Single EIR should provide an update on the status of the assessment and remediation activities for this release, describe how remediation and construction activities will be coordinated, and identify measures to minimize risks to public health and the environment associated with construction activities, including any excavation, dewatering, storage, treatment, and on-site or off-site transport of contaminated materials. The Single EIR should include a supplemental analysis of potential impacts on EJ populations during the construction period and identify mitigation measures.

Land Alteration

The project will alter a total of 70.63 acres of land, including 14.3 acres of existing paved runway that will be reconstructed; 5.13 acres of new impervious area associated with the runway extension, extension of Taxiway E, and new spur taxiways; and 51.20 acres of grassland and IVW within the airfield that will be regraded to provide RSAs or drainage structures. With the exception of IVW (discussed below) and 1.08 acres of forested land, land areas to be altered are maintained as grassland under existing conditions and will continue to be maintained that way under proposed conditions.

The existing paved Runway 16-34 slopes from an elevation of approximately 108 ft NAVD 88 at the northern (Runway 16) end to approximately 82 ft NAVD 88 at the southern

(Runway 34) end. The area south of the Runway 34 end slopes down from the end of the runway pavement to an elevation of approximately 70 ft NAVD 88.

The project will regrade the areas adjacent to the sides and ends of Runway 16-34 to establish a smoothly sloping grades that generally follow existing contours and eliminate abrupt grade changes in topography. Under proposed conditions, the proposed RSA north of Runway 16-34 will slope down from the paved runway (elevation 107 ft NAVD 88) to tie in to existing grades at elevations 91 to 100 ft NAVD 88.. At the southern end of the runway, the RSA will slope down from 75 ft NAVD 88 to meet the existing grade at 70 ft NAVD 88. Along the sides of the runway and Taxiway E, regrading will establish more consistent grades that slope slightly down from paved areas, but will generally follow existing grades with no significant changes. The Single EIR should provide an analysis of the volume of material to be excavated at the site.

Wetlands and Stormwater

Wetland resource areas subject to jurisdiction under the Wetlands Protection Act (WPA) at the project site include BVW and Bank associated with an intermittent stream. These resource areas are within the portion of the project site located in Beverly; however, they will not be directly impacted by the project. The project site also includes IVW located in Beverly and Wareham which are protected under local bylaws; IVW in Beverly will not be impacted by the project. The project will directly alter six discrete IVWs in Wenham with a combined area of 13,800 sf. The EENF included a copy of the Determination of Applicability issued by the Wenham Conservation Commission on March 20, 2025, which confirms that the IVW is subject to the Wenham Water Resources Protection Bylaw and that that there are no resource areas subject to the WPA within the project site in Wenham. It appears that one or possibly two of the IVW to be impacted are located within the ORW. As detailed below, the Single EIR should assess the importance of these IVWs in protecting the Wenham Lake water supply and describe proposed IVW replication or other measures that will mitigate impacts to the ORW.

The existing stormwater management system serving Runway 16-34 includes a series of catch basins along both sides of the runway that are connected to drainpipes. The four catch basins at the northern end of the runway are connected to a pipe that conveys flows to a large wetland system east of the runway. Most of the catch basins along the east side of the runway, and catch basins collecting runoff from the existing portion of Taxiway E, direct flows to a pipe which conveys flows to the south, where they are discharged toward the wetland area located south of the Runway 34 end. The catch basins on the west side of the runway are connected to a pipe that flows south and conveys flows to the drainage system on the west side of the airport.

According to the EENF, the existing Runway 16-34 drainage system is located within the proposed expanded RSA; however, FAA requires drainage infrastructure to be located outside of the RSA. Therefore, a new stormwater management system will be constructed approximately 200 ft west of the runway. Runoff from the extended ends of the runway will be managed using impervious lined drainage trenches with perforated pipes, water quality units, and underground infiltration systems. East of the runway, runoff from taxiways E, E5, E6, and E7 will be collected in impervious lines drainage trenches with perforated drainpipes, water quality units, and underground infiltration systems adjacent to these taxiways. According to the Proponent, the

stormwater management system will meet the requirements of the SMS; however, the EENF did not provide calculations or a detailed analysis of how the project will meet these requirements, including those for removal of Total Suspended Solids (TSS), attenuation of peak flows, and additional TSS removal requirements for discharges in an ORW. In addition, according to the EENF, the FAA stormwater design criteria are based on the 24-hour, 5-year storm event (approximately 4.17 inches of precipitation), and the FAA will not provide funding for a stormwater management system with capacity above this design storm. The Single EIR should confirm the Proponent's commitment to construct the stormwater management system consistent with all requirements of the SMS, and evaluate the capacity of the proposed management system to handle flows from projected storm events under future climate conditions.

Hazardous Waste

According to the EENF, MassDEP has assigned Release Tracking Numbers (RTNs) to seven releases of hazardous wastes at the airport. One of the releases, designated as RTN 3-0036118, is associated with the detection of PFAS in groundwater as a result of the use of PFAS-containing aqueous film-forming foam (AFFF) during a fire training exercise in 2009. Approximately seven acres of the estimated extent of the PFAS release (RTN 3-0036118) overlaps with proposed activities, including construction of the Taxiway E extension, regrading, and construction of the stormwater management system. According to the EENF, the release of PFAS is undergoing assessment in accordance with the MCP on a separate schedule from the project, and the precise area of contamination to be disturbed by project activities, the concentrations of contaminants, and appropriate remediation activities is not yet known. As detailed below, the Single EIR should review the requirements of the MCP that will govern construction activities within areas where contamination is present, and include commitments to implement mitigation measures to protect human health and the environment.

Climate Change

Adaptation and Resiliency

Effective October 1, 2021, all MEPA projects are required to submit an output report from the MA Resilience Design Tool to assess the climate risks of the project. Based on the output report attached to the EENF, the project has a High exposure rating based on the project's location for stormwater flooding caused by extreme precipitation and for extreme heat, and a Moderate exposure rating to riverine flooding associated with extreme precipitation. Based on the 20-year useful life and the self-assessed criticality of the project, the MA Resilience Design Tool recommends a target planning horizon of 2050 and a return period associated with a 25-year (4% annual chance) storm event with predicted 24-hour precipitation depth of 7.7 inches when designing the runway and taxiway for extreme precipitation. The Tool recommends planning for the 90th percentile with respect to extreme heat (which indicates an increase in extremely hot days as compared to a historical baseline). The 20-year useful life appears to have been selected because that is when reconstruction of Runway 16-34 and Taxiway E may be necessary for maintenance purposes. The Single EIR should confirm how the useful life of the project was determined, and whether the 20-year useful life also applies to the proposed stormwater management system.

As noted above, the EENF appears to indicate that the stormwater management system will be designed in accordance with the SMS, including the requirement to attenuate peak flows under the present-day 100-year storm event, but suggests that the design capacity may be limited in its ability to manage large storm events. The Single EIR should identify the precipitation levels that will be used to design the stormwater management system and compare them to the recommendations generated by the Tool. If the stormwater management system is expected to have a design life longer than that of the runway and taxiway, the Single EIR should evaluate the performance of the stormwater management system under projected 2070 storm conditions. According to the EENF, the airport is not within the 100-year floodplain and project plans appear to show that the airfield, including Runway 16-34 and Taxiway E, are approximately 10 ft higher than the wetlands and floodplain located adjacent to the site. The Single EIR should provide an assessment of the vulnerability of the site to flooding under future conditions.

The project will add approximately 5.13 acres of impervious area; however, the project will not remove any trees and most areas to be regraded will be replanted and established in their pre-construction condition. As noted above, the Single EIR should evaluate alternatives for reducing proposed impervious area to minimize the project's heat impacts.

Construction Period

All construction activities should 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 project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management, etc.) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle C&D debris to the maximum extent. The draft Section 61 Findings to be provided in the Single EIR should list all mitigation measures that will be implemented during the construction period.

SCOPE

General

The Single EIR 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 clearly demonstrate that the Proponent will avoid, minimize and mitigate Damage to the Environment to

the maximum extent practicable through project alternatives and design. The Scope should be addressed in the context of the Review of the EENF above.

Project Description and Permitting

The Single EIR should include updated site plans for existing and post-development conditions at a legible scale and a detailed description of all project components. It should identify any changes since the filing of the EENF. Conceptual plans should be provided at a legible scale. The Single EIR should identify and describe state, federal and local permitting and review requirements associated with the project, 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.

The Single EIR should provide additional information available in the 2022 Master Plan, or prepared since then by the Proponent, regarding projections of future aircraft operations, noise and air emissions levels associated with aircraft operations under existing and projected conditions, and potential development of hangars in the near-term, including estimates of demand for hangar space by type of aircraft and use. The Single EIR should clarify the estimated time frames for short-term and intermediate-term projects identified in the 2022 Master Plan, and confirm that none of the listed projects are anticipated to occur within the next five years. The Single EIR should indicate whether the listed projects are anticipated to cumulatively exceed MEPA review thresholds. It should identify areas where future development would occur that would add impervious area and require additional drainage improvements, and estimate potential increases in traffic on area roadways associated with future development identified in the Master Plan. The Single EIR should include a commitment to consult with the MEPA Office regarding the potential need for additional MEPA review of future activities at the Airport.

The Single EIR should clarify the timing of future assessments to evaluate a further extension of Runway 16-34 to meet C-II runway designation standards, and what additional reviews and permitting, including MEPA and NEPA reviews, are anticipated for such work. If no (state) Financial Assistance or Agency Action under MEPA is contemplated for the future extension, the Single EIR should provide as much disclosure as is practicable related to the future extension, including information about potential increases in aircraft traffic and associated air and noise impacts that would result from such an increase. The Single EIR should discuss whether the 2022 Master Plan or other document includes projections for airport usage by the Challenger 300 or similar class of aircraft that underlies the C-II designation, and, if so, report on the projected trends for such aircraft classes over a future planning horizon (10 to 15 years). The Single EIR should provide a general estimate of any on-site or off-site environmental impacts, such as impervious area, wetlands impacts, and vegetation management that would result from further extension of the runway or associated RSA and other dimensions to meet C-II standards. If further MEPA review is anticipated for the extension, the Single EIR may omit detailed disclosures, but should indicate the potential timing of such future review.

The information and analyses identified in this Scope should be addressed within the main body of the Single EIR and not in appendices. In general, appendices should be used only to provide raw data, such as drainage calculations, that is otherwise adequately summarized with

text, tables, and figures within the main body of the Single EIR. 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. The individual sections should be clearly identifiable and labeled in a manner that reflects the contents of the section. Any references in the Single EIR to materials provided in an appendix should include specific page numbers to facilitate review.

Alternatives Analysis

Given the extent of proposed activities, including new impervious area, within the ORW, the Single EIR should review the need for each of the three proposed spur taxiways based on FAA design requirements as applicable to the Airport. It should evaluate alternatives that would minimize new impervious area by eliminating one of the proposed spur taxiways from the project design, combining the two proposed taxiways at the northern end of Taxiway E, and reducing the dimensions of one or more of the spur taxiways. The Single EIR should evaluate the potential to minimize impacts to the ORW and to minimize extreme heat by reducing impervious area elsewhere on the project site.

Environmental Justice

The Proponent should continue community engagement efforts throughout the remainder of MEPA review. The Single EIR, or a summary thereof, should be distributed to all CBOs and tribes/indigenous organizations included in the "EJ Reference List" that was utilized to provide notice of the EENF, and an updated list should be obtained from the MEPA Office to ensure that contact information is current. The Single EIR should provide a full list of public involvement efforts that the Proponent intends to follow for EJ populations within the DGA for the remainder of the MEPA review process for the projects described in the EENF, and should describe how public engagement will be maintained during the planning process for future projects identified in the 2022 Master Plan. Given the interest in the project expressed by the Town of Wenham, I encourage the Proponent to hold a public meeting about the project and Master Plan prior to filing the Single EIR. The Proponent should maintain a project contact list (expanded beyond just the EJ Reference List provided by the MEPA Office) consisting of any attendees at prior meetings or other members of the public that have expressed interest in obtaining ongoing project updates (including for future phases), and should provide a mechanism by which the Proponent will formally respond to any comments or concerns raised by the public. The Proponent is also encouraged to distribute a project fact sheet to the expanded distribution list by posting the fact sheet online (e.g., social media, project website, neighborhood groups) and physically in local gathering spaces. The Single EIR should include documentation of public comments/concerns received as part of its description of community engagement efforts, and indicate how the project has responded to such input.

The Single EIR should describe construction activities, including traffic generated by construction-related vehicles, and storage, management, and disposal of contaminated and non-contaminated materials, and describe mitigation measures that will be implemented to minimize impacts on EJ populations. This analysis should be informed by a review of DPH data on pollution sources in the DGA.

Land Alteration

The Single should provide a cut and fill analysis for the proposed grading of the RSAs. It should estimate the volume of soil that will be excavated and deposited elsewhere on the site or transported off-site. It should include an estimate of the number of truck trips needed to transport material off-site, if necessary.

Wetlands and Stormwater

The Single EIR clarify the design of the stormwater management system and the Proponent's intention to design the system to fully comply with the SMS or identify specific provisions of the SMS that may not be met and explain why. It should identify the design storms and precipitation levels that will be used as the basis of the design of the system, and evaluate potential for the stormwater management system to be designed with additional capacity for precipitation from future projected storm events. If the Proponent intends to use FAA design criteria (24-hour, 5-year storm), the Single EIR should provide an analysis of the permittability of the proposed stormwater management system and its effectiveness in draining stormwater from critical areas of the airport and protecting water quality. In particular, the Single EIR should review how the design of the system will comply with SMS requirements for discharges in ORWs.

The Single EIR should assess the importance of the IVWs located within the ORW in protecting the Wenham Lake surface water supply. It should identify potential measures to mitigate impacts to IVW, including wetland replication, and describe how the project will mitigate impacts to the ORW.

Climate Change Adaptation and Resiliency

The Single EIR should clarify whether the proposed stormwater management system is expected to have the same 20-year useful life at the runway and taxiway; if the proposed stormwater management system is intended to continue to function after the runway and taxiway are reconstructed at the end if their useful lives, the Single EIR should include an evaluation of system designs that will have the capacity to handle flows from 2070 storms using projected precipitation levels available from the ResilientMass Climate Change Projections Dashboard.[7] According to the EENF, the project site does not have a history of flooding. The Single EIR should compare the elevation of the mapped floodplain in the vicinity of the site to proposed elevations at the project site and assess the potential for flooding under future climate conditions. The Single EIR should assess alternatives for minimizing impervious area at the site or off-site tree planting to mitigate future extreme heat impacts.

Hazardous Waste

The Single EIR should review proposed activities within the area of the PFAS release and describe how dewatering, excavation, storage, treatment, and, if necessary, off-site transport

[7] https://resilientma-mapcenter-mass-eoeea.hub.arcgis.com/#ClimateDashboard

will be conducted in a manner that will protect public health and the environment, including measures to be implemented if material must be transported off-site through EJ populations in the DGA. It should describe how the project will be conducted if a Permanent Solution under the MCP is not yet reached when construction of the project is ready to commence, and discuss potential scenarios of how the project may be constructed in a manner consistent with any required ongoing assessment or remediation.

Mitigation and Draft Section 61 Findings

The Single EIR 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 Town 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, environmental justice, 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.

Responses to Comments

The Single EIR should contain a copy of this Certificate and a copy of each comment letter received. The Single EIR should contain a direct response to the scope items in this Certificate. In order to ensure that the issues raised by commenters are addressed, the Single EIR should include a comprehensive response to comments that specifically address each issue raised in this Certificate and in each comment letter; references to a chapter or sections of the Single EIR 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 Single EIR beyond what has been expressly identified in this certificate.

Circulation

In accordance with 301 CMR 11.16(3), the Proponent should circulate the Single EIR to each Person or Agency who commented on the EENF, each Agency from which the Proponent 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 Single EIR to commenters in a digital format (e.g., CD-ROM, USB drive), by directing commenters to a project website address, or electronically. However, a reasonable number of hard copies must be made available to accommodate those without convenient access to a computer and distribute these upon request on a first-come, first-served basis. A copy of the

Single EIR should be made available for review at the public libraries of Beverly, Danvers, and Wenham.

April 17, 2026
Date

Rebecca L. Tepper

Comments received:

03/26/2026	Salem and Beverly Water Supply Board
03/26/2026	Town of Wenham
03/27/2026	Massachusetts Department of Environmental Protection (MassDEP)/ Northeast Regional Office (NERO)
04/09/2026	Beverly Conservation Commission

RLT/AJS/ajs

SALEM AND BEVERLY WATER SUPPLY BOARD

50 ARLINGTON AVENUE, BEVERLY, MA 01915-1035
Tel. (978) 922-2600 Fax (978) 921-4584

ALAN F. TAUBERT, JR, P.E.
EXECUTIVE DIRECTOR

BRADLEY E. PERRON
DEPUTY DIRECTOR

March 26, 2026

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Mr. Alexander Strysky, Environmental Analyst, EEA No. 17047
100 Cambridge Street, Suite 900
Boston MA 02114

RE: EENF Public Comment - Reconstruct and Extend Runway 16-34 and Construct New Taxiway

Dear Mr. Strysky,

Acting as the fiduciary duty of a public water supplier charged with the protection of the surface water resources on behalf of the City of Salem and Beverly, Massachusetts, the Salem and Beverly Water Supply Board (hereafter "the Board"), is obliged to provide comments on behalf of the proposed project "Reconstruct and Extend Runway 16-34 and Construct New Taxiway E Project (EEA#17047)" (herein "the Project"). By its governing legislation, the Board is an independent joint water district that provides drinking water to over 90,000 individuals within the cities of Salem and Beverly, and parts of the Town of Wenham.

The proposed project to reconstruct and extend Runway 16-34 is within the watershed of the Board's terminal reservoir Wenham Lake (Class A waterbody). While the long existence of the Beverly Airport neighboring activities has not lent itself to direct impact to the water supplies operation, the Project does raise to the circumstance of greater involvement of the Board to ensure there is no impact to its water supplies. Through this application process, the Board has expressed our concerns to the applicants and there have been verbal assurances that the Board will be engaged during the project accordingly.

As it relates to comments for consideration by the Massachusetts Environmental Policy Act (MEPA) Office, the Board would request that the Department of Environmental Protection Source Water Protection Division validate the Zone A boundary within the project area, specifically as to the application of the Massachusetts Stormwater Standards. In coordination with the applicant, the Board has requested that Zone A boundaries be delineated from the existing wetland conditions indicated on the project plans for subsequent permitting as required by the Act. With the presence and activity impacting the noted "estimated" RTN 3-36118 Disposal Site Boundary for the 21E Sites (BVY Environmental Constraints – Figure 7), the Board request assurance that there will be no uncontrolled discharge of stormwater and subsurface discharges related to the project activities. Lastly, we request to be included in the list of interested parties for any correspondence related to this project, related to potential impacts to our water supplies.

If there are any additional questions or concerns related to this matter, please reach out to us by phone or email, as referenced herein.

Sincerely,

Town of Wenham

Town Hall
138 Main Street
P. O. Box 576
Wenham, MA 01984

March 26, 2026

Secretary Rebecca L. Tepper
C/O Alexander Strysky
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Expanded Environmental Notification Form (EENF)
Beverly Regional Airport – Runway 16-34 Reconstruction and Extension and Taxiway E Project
Beverly, Danvers, and Wenham, Massachusetts

Dear Secretary Tepper:

The Wenham Select Board and the Wenham Conservation Commission respectfully submit the following comments on the Expanded Environmental Notification Form (EENF) for the proposed reconstruction and extension of Runway 16-34 and construction of Taxiway E at Beverly Regional Airport (BVY).

Because the proposed runway extension would extend into the Town of Wenham and affect wetlands and water resources within Wenham's jurisdiction, the Town has a direct interest in ensuring that the environmental impacts and alternatives associated with this project are fully evaluated through the Massachusetts Environmental Policy Act (MEPA) process.

At the outset, the Town respectfully requests that the MEPA Office grant a **minimum 21-day extension of the public comment period** for this Expanded ENF.

The EENF process effectively serves as the initial scoping document for the Environmental Impact Report (EIR), yet the current schedule provides the public with little more than two weeks after the remote site visit/consultation session to review a complex submission exceeding two hundred pages with extensive attachments. The MEPA virtual site visit was attended by only three representatives from Wenham, and it appears that other affected municipalities may not have been aware of the site visit or the filing. Given the scope of the proposal, the multi-municipal impacts, and the presence of Environmental Justice populations in the review area, additional time is necessary to ensure meaningful public participation consistent with the intent of MEPA.

Beyond the need for additional time, the Town has identified several areas in which the EENF appears incomplete or insufficient to support the level of review requested by the Proponent.

First, the project purpose and need statement focuses on "safety improvements," yet the EENF acknowledges that the proposed runway configuration does not fully meet Federal Aviation Administration (FAA) Runway Safety Area requirements. The FAA standard requires approximately 1,000 feet of safety area beyond the runway end, while the proposed design provides only slightly more than half of that distance at the Runway 16 end in Wenham. The EENF states that the project meets the standard only "to the maximum extent practicable" and anticipates that full compliance may need to be addressed in the future. This raises significant questions about whether the proposed design actually achieves the stated safety objectives of the project. If the project purpose is safety compliance, the alternatives analysis should evaluate designs that fully satisfy FAA safety standards or evaluate alternative safety technologies that do not require runway extension.

The EENF also suggests that additional work may be required in the future to fully comply with FAA Runway Safety Area standards. Deferring elements of a project that are necessary to achieve the stated safety objective raises concerns under the MEPA regulations regarding project segmentation. Under 301 CMR 11.01(2)(c), projects may not be segmented in order to defer or minimize environmental review of reasonably foreseeable actions. If additional runway safety area work will ultimately be required to achieve full FAA compliance, that work should be evaluated as part of the present MEPA review rather than deferred to a future filing. Without evaluating the full scope of improvements necessary to meet the applicable safety standards, the MEPA process cannot adequately assess the total environmental impacts of the project.

Second, the alternatives analysis appears unduly limited. The EENF focuses primarily on variations of the proposed extension and does not meaningfully evaluate alternative safety measures that could reduce risk without extending the runway footprint into additional environmentally sensitive areas. For example, engineered arresting systems such as crushable concrete arrestor beds (EMAS) have been installed at major airports, including Logan International Airport, to safely stop aircraft overruns without requiring full 1,000-foot runway safety areas. The EENF does not appear to evaluate such alternatives in a substantive way. If alternative technologies could achieve the stated safety goals while avoiding wetland impacts and runway expansion into Wenham, the MEPA process should require their evaluation.

Third, the environmental impacts described in the filing appear understated or incompletely analyzed. The project would create more than five acres of new impervious surface and permanently fill approximately 13,800 square feet of isolated vegetated wetlands within Wenham. The EENF also acknowledges that part of the project lies within the public water supply watershed to Wenham Lake, an Outstanding Resource Water (ORW), and within the Ipswich River Basin, which is designated as a high-stress basin. These conditions warrant a particularly careful analysis of stormwater, groundwater recharge, and potential downstream water quality impacts. The filing states that the project will comply with stormwater standards "to the maximum extent practicable," yet the EENF provides limited detail on long-term hydrologic impacts within the Wenham Lake watershed.

Fourth, the EENF's conclusions regarding aircraft operations and noise appear speculative and unsupported by detailed analysis. The filing states that the runway extension will not change the volume or composition of aircraft using the airport. However, the airport has recently been

reclassified as a C-II facility capable of accommodating larger turbine aircraft, and the runway extension would provide additional takeoff distance for those aircraft. The EENF does not appear to provide a detailed operational forecast, noise modeling, or cumulative impact analysis that would substantiate the claim that aircraft activity will remain unchanged. Nearby residents have reported increased jet traffic in recent years, and the extension could facilitate additional use by larger aircraft.

Fifth, the EENF contains several areas where required analyses appear incomplete or deferred.

For example:

- The EENF acknowledges that a portion of the project area overlaps with the disposal site boundary of RTN-3-0033420, an active Tier II Massachusetts Contingency Plan site currently in Phase IV remedial implementation. However, the filing provides minimal analysis of how runway reconstruction, grading, and drainage modifications may interact with contaminated soils or groundwater conditions at this location
- Climate change adaptation strategies were not incorporated into the project design despite the RMAT analysis identifying moderate or high exposure factors associated with impervious surfaces.
- The EENF relies heavily on attachments and future studies that are not included in sufficient detail to evaluate impacts at this stage of MEPA review.

Finally, the Town notes concerns raised by nearby residents, including those articulated in correspondence submitted by abutter Kenneth Whittaker of Enon Road. Dr. Whittaker's letter highlights the potential for the runway extension to encourage increased operations by larger corporate jets and questions the appropriateness of using a large business jet as the design aircraft for a community regional airport. The Town shares the concern that the design aircraft selection and runway extension may fundamentally change the scale of operations at the airport and that these operational impacts have not been fully analyzed.

In summary, the Town of Wenham believes the current EENF raises substantial questions regarding project purpose, alternatives, safety compliance, environmental impacts, and operational consequences. These issues warrant a more comprehensive review than is currently possible within the abbreviated Expanded ENF comment period.

Accordingly, the Wenham Select Board and the Wenham Conservation Commission respectfully request that the MEPA Office:

1. Grant a minimum 21-day extension of the comment period for the Expanded ENF;
2. Require a more robust alternatives analysis, including evaluation of runway arresting technologies and other safety measures that avoid runway extension;
3. Require detailed analyses of noise, aircraft operations, and cumulative impacts associated with potential increases in jet activity;
4. Require additional analysis of wetland, watershed, and groundwater impacts**,** particularly within the Wenham Lake Outstanding Resource Water watershed; and
5. Carefully evaluate whether the current filing provides sufficient information to proceed with a Single Environmental Impact Report or whether a revised filing is necessary.

We appreciate the opportunity to provide comments on this filing and look forward to participating constructively in the MEPA review process.

Respectfully submitted,

Wenham Select Board

Benjamin B. Tymann, Chair

Gary R. Cheeseman

Deirdre T. Pierotti

Peter M. Clay

Wenham Conservation Commission

Philip Colarusso, Chair

Kenneth F. Whittaker

Jeffrey Ham

Jackie LeClair

Leo Maestranzi

Michael Novak

Asma Syed

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 150 Presidential Way Woburn, MA 01801 • 978-694-3200

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

March 27, 2026

Rebecca L. Tepper, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Beverly, Danvers, Wenham
Reconstruct and Extend runway 16-34 and
Construct New Taxiway E Project
EEA # 17047

Attn: MEPA Unit

Dear Secretary Tepper:

The Massachusetts Department of Environmental Protection Northeast Regional Office (MassDEP-NERO) has reviewed the Expanded Environmental Notification Form (EENF), filed by GZA GeoEnvironmental, Inc., for the proposed Reconstruct and Extend runway 16-34 and Construct New Taxiway E Project in Beverly, Danvers and Wenham. MassDEP provides the following comments.

Massachusetts Contingency Plan (MCP, 310 CMR 40.0000)

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Site Cleanup (BWSC) has reviewed Expanded Environmental Notification Form (ENNF) number (No.) 17047 for the above-referenced project. The Beverly Airport Commission proposes the full depth reconstruction and extension of Runway 16-34 by paving approximately 300 feet of both runway ends, and the extension of Taxiway E from the existing east apron to the new end of Runway 16 with the inclusion of three connector taxiways. There are seven Release Tracking Numbers (RTNs) associated with the Beverly Regional Airport (Property). Four RTNs have achieved a Permanent Solution with No Conditions (RTNs 3-0000230, 3-0000231, 3-0000235, 3-0036193). RTN 3-0024363 was linked to Primary RTN 3-0033420 in 2021. RTN 3-0033420 is classified as a Tier II Disposal Site in Phase IV Remedy Implementation Status and Remedial Monitoring Report for the monitored natural attenuation of petroleum-impacted groundwater in the northeastern portion of the Property. Soil and groundwater have been impacted at this Disposal Site by releases of Aviation Gas and Jet-A fuel, attributable to historical use

of aboveground and underground storage tanks and/or surficial spills. RTN 3-0036118 has been classified as a Tier II Disposal Site under the MCP, with a Phase II Comprehensive Site Assessment Report submitted in August 2025. The primary impacted media at this Disposal Site are groundwater and to a lesser degree soil. Two distinct per- and polyfluoroalkyl substances (PFAS) release areas have been identified, with one of the areas, (the southwestern release area), attributable to a fire training exercise performed in the vicinity of Taxiway F in 2009. The RTN 3-0036118 Disposal Site boundary is within the project area.

Contaminated Soil and Groundwater:

The project proponent is advised that excavating, removing and/or disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of MGL c.21E (and, potentially, c.21C), the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000), and all other applicable federal, state, and local laws, regulations, and bylaws. If permits and approvals under these provisions are not obtained beforehand, considerable delays in the project can occur. The project proponent cannot manage contaminated media without prior submittal of appropriate plans to MassDEP, which describes the proposed contaminated soil and groundwater handling and disposal approach, and health and safety precautions. If contamination at the site is known or suspected, the appropriate tests should be conducted well in advance of the start of construction and professional environmental consulting services should be readily available to provide technical guidance to facilitate any necessary permits. If dewatering activities are to occur at a site with contaminated groundwater, or in proximity to contaminated groundwater where dewatering can draw in contamination, a plan must be in place to properly manage the groundwater and ensure site conditions are not exacerbated by these activities. A Licensed Site Professional (LSP) must be employed or engaged to manage, supervise or perform the necessary response actions at the site.

Air Monitoring:

Dust and/or vapor monitoring and controls are often necessary for large-scale projects in contaminated areas. The need to conduct real-time air monitoring for contaminated dust and to implement dust suppression must be determined prior to excavation of contaminated soils, especially those contaminated with compounds such as metals and PCBs. An evaluation of contaminant concentrations in soil should be completed to determine the concentration of contaminated dust that could pose a risk to health of on-site workers and nearby human receptors. If this dust concentration, or action level, is reached during excavation, dust suppression should be implemented as needed, or earthwork should be halted.

Ambient air monitoring at the site perimeter and near areas of excavation and management of soils contaminated with volatile organic compounds such as trichloroethylene (TCE), should be implemented using field instrumentation capable of detecting low concentrations of TCE (ex: 1 ppbV TCE). A detailed air monitoring program should be developed prior to excavation activities to include monitoring frequency, action levels, sampling the indoor air of nearby structures, as needed, and mitigation measures.

Capping of Contaminated Soil:

If capping of contaminated soil is needed to achieve a level of No Significant Risk, MassDEP recommends the following capping design criteria for those soils categorized as S-1 pursuant to 310 CMR 40.0933. In unpaved areas, a minimum of three feet of clean soil should be placed over the contaminated soil. This protective layer of clean soil should be separated from the underlying contaminated soil by a geotextile or combination of materials, which will provide both a brightly colored visual marker and a permeable fabric to separate the clean soil from the contaminated soil. In paved areas, a minimum one-foot cap consisting of clean soil, road base and the pavement layer should be placed over the contaminated soil. Similar to unpaved areas, the contaminated soil should be separated from the clean soil or road base using a visual marker and geotextile. In such cases, an Activity and Use Limitation (AUL), prepared in accordance with 310 CMR 40.1012 would be necessary to identify the maintenance requirements of the cap. As needed, MassDEP may approve alternative capping design proposals that incorporate more robust capping components on a case-by-case basis.

New Structures and Utilities:

Construction activities conducted at a disposal site shall not prevent or impede the implementation of likely assessment or remedial response actions at the site. Construction of structures at a contaminated site may be conducted as a Release Abatement Measure if assessment and remedial activities prescribed at 310 CMR 40.0442(3) are completed within and adjacent to the footprint of the proposed structure prior to or concurrent with the construction activities. Excavation of contaminated soils to construct clean utility corridors should be conducted for all new utility installations.

Parties proposing the installation of one or more stormwater management systems within a disposal site boundary should ensure the final proposed design is evaluated by an LSP prior to installation. Systems that feature onsite infiltration discharge points or retention basins have the potential to influence or modify the existing shallow groundwater flow regime. Onsite stormwater infiltration may have an amplified influence on underlying groundwater flow if/when these proposed discharge points are located beneath large areas of impervious surfaces (i.e. parking lots). As such, an LSP should evaluate proposed stormwater infiltration point source location(s) to confirm nearby and/or underlying areas of groundwater contamination are not exacerbated by onsite stormwater management.

Climate Change Resiliency

In 2024, MassDEP established climate change resiliency regulations in the Massachusetts Contingency Plan. Pursuant to the MCP's Response Action Performance Standards, environmental response actions should incorporate climate change resilience to the extent practicable and consistent with response action requirements. Furthermore, a Permanent Solution shall ensure a level of control of each identified substance of concern at a site or in the surrounding environment such that no such substance of concern shall present a significant risk of harm to health, safety, public welfare or the environment during any foreseeable period of time, considering existing site conditions and reasonably foreseeable future changes in site conditions, including anticipated impacts associated

with climate change. As necessary, involved parties should review factors contributing to the project's climate impact vulnerability, as further described in the Commonwealth's 2023 State Hazard Mitigation and Climate Adaptation Plan referred to as the ResilientMass Plan [https://www.mass.gov/info-details/2023-resilientmass-plan].

Activity and Use Limitations:

An Activity and Use Limitation (AUL) is a legal document that is recorded or registered at the appropriate Registry of Deeds and identifies site conditions that are the basis for maintaining a condition of No Significant Risk at a property where contamination remains after a cleanup. The AUL identifies permitted and allowable site uses and activities that may occur at a property while maintaining No Significant Risk. The AUL also identifies restricted uses and activities, which could result in the exposure of people at or near the disposal site to remaining contamination if such activities were to occur. The project proponent is advised that in cases where proposed activities would not be consistent with a level of No Significant Risk and/or an existing AUL, additional cleanup and the amendment or termination of the initial AUL and implementation of a revised AUL would be necessary before the proposed activities could occur. With the exception of 310 CMR 40.1067(5)(a), submittal of a Release Abatement Measure Plan or a Phase IV Plan to MassDEP is required prior to conducting remedial actions within an area subject to an AUL pursuant to 310 CMR 40.1067(5)(b) or (c).

Site-Specific Comments:

The work and/or construction associated with this project should not prevent and/or impede future MCP Response Actions for open RTNs 3-0033420 and 3-0036118. RTN 3-0033420 is adjacent to the project area and currently in Phase IV of the MCP. A Permanent or Temporary Solution has not yet been achieved, and monitoring of the Comprehensive Remedial Action is necessary to achieve a Permanent or Temporary Solution under 310 CMR 40.1000. RTN 3-0036118 is within the project area. Specifically, at the southern end of the proposed new Taxiway E and a central portion of Runway 16-34. The prior consultant overseeing this RTN recommended that a portion of this Disposal Site may be closed via a Partial Permanent Solution Statement, while another portion will progress to MCP Phase III. The project should not hinder the identification and evaluation of remedial action alternatives at the Disposal Site which are reasonably likely to achieve a level of No Significant Risk considering the oil and hazardous material present, media contaminated, and site characteristics. Lastly, the project should not delay the MCP timeline for required submittals. A Tier Classification Extension Submittal for RTN 3-0036118 was received by MassDEP on January 30, 2026. The Tier Classification Extension is effective for two years from the date that the Tier Classification Extension Submittal is received by MassDEP.

The MassDEP appreciates the opportunity to comment on this proposed project. Please contact Andrew.Clark@mass.gov at (617) 947-2245 for further information on Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) issues. If you have any general questions regarding these comments, please contact me at John.D.Viola@mass.gov or at (857) 276-3161.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission,
Eric Worrall, Andrew Clark, Tiffany Duhl, MassDEP-NERO

CITY of BEVERLY
CONSERVATION COMMISSION
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April 9, 2026

Secretary Rebecca L. Tepper
C/O Alexander Strysky
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Expanded Environmental Notification Form (EENF) Beverly Regional Airport – Runway 16-34 Reconstruction and Extension and Taxiway E Project Beverly, Danvers, and Wenham, Massachusetts

Dear Secretary Tepper,

The Beverly Conservation Commission respectfully submits the following comments on the Expanded Environmental Notification Form (EENF) for the proposed reconstruction and extension of Runway 16-34 and construction of Taxiway E at Beverly Regional Airport (BVY).

Because a large portion of the proposed runway extension and taxiway construction would be on the City of Beverly side of the airport, and appear to affect wetlands and water resources within Beverly's jurisdiction, the Beverly Conservation Commission has a direct interest in ensuring that the environmental impacts and alternatives associated with this project are fully evaluated through the Massachusetts Environmental Policy Act (MEPA) process.

The Beverly Conservation Commission is aware of this project and that portions of the proposed work will take place within jurisdictional resource areas and buffer zones. Section 5.1.6 of the EENF narrative states that the six Isolated Vegetated Wetlands (IVW) that are proposed to be completely or partially filled are all in Wenham, but based on the plans submitted with the EENF, it appears that a portion of the limit of work is directly within an IVW in Beverly. Perhaps the work will only occur in the buffer zone to this IVW, but if not, the Commission would require an environmental assessment and a wetland

replication plan as part of the Notice of Intent. The Beverly Wetlands Ordinance regulations pertaining to IVWs (§565-9) are attached to this letter.

In an effort to avoid duplication, the Beverly Conservation Commission is in full support of the March 26, 2026, comment letter from the Town of Wenham Select Board and Conservation Commission.

Sincerely,

Christine Bertoni
Chair, Conservation Commission

§ 565-9. Isolated vegetated wetlands.

A. Isolated vegetated wetlands are likely to be significant to the interests identified in 310 CMR 10.55(1) that are supported by bordering vegetated wetlands and other interests identified in the ordinance, including protection of private and public water supply and groundwater, flood control, storm damage prevention, prevention of pollution, protection of fisheries, wildlife habitat, erosion and sedimentation control, and rare plant and animal habitat.

B. Definition, critical characteristics, and boundary. Isolated vegetated wetlands protected under the ordinance are freshwater wetlands, of at least 1,000 square feet in area, that do not border on creeks, rivers, streams, ponds or lakes and that do not qualify as a vernal pool under § 565-8 (in which case the area will be regulated as a vernal pool). The types of isolated vegetated wetlands include, but are not limited to, wet meadows, marshes, swamps and bogs. In addition to the minimum size requirement, isolated vegetated wetlands must also meet at least two of the following three criteria:

(1) The vegetation community of an isolated vegetated wetland consists of 50% or more wetland indicator plants. Wetland indicator plants are classified in the following categories: facultative, facultative +, facultative wetland -, facultative wetland, facultative wetland +, or obligate wetland (source: U.S. Fish and Wildlife Service); or

(2) Other indicators of hydrology, including site inundation or saturation, water marks, drift lines, sediment deposits, oxidized rhizospheres, water-stained leaves, shallow root systems, buttressed tree trunks, and recorded hydrologic data (stream gauge, aerial photo, or other); or

(3) Presence of hydric soils.

C. Presumption of significance. Where a proposed activity involves the removing, filling, dredging, or altering of an isolated vegetated wetland or land within the 100-foot buffer zone to an isolated vegetated wetland, the Commission shall presume that the isolated vegetated wetland is significant to the interests specified in § 565-9A of these regulations. This presumption may be overcome by the applicant's presentation of evidence sufficient to demonstrate, by a preponderance of credible evidence, that the isolated vegetated wetland does not play a role in the protection of said interests. If the Commission finds that this presumption has been overcome, it shall make a written determination to this effect, setting forth its grounds.

D. Performance standards. When the presumption set forth in Subsection C of this section is not overcome, any proposed work in the isolated vegetated wetlands shall comply with the following performance standards:

(1) No alteration or impairment of isolated vegetated wetland. No activity is permitted within or above an isolated vegetated wetland. No activity is permitted within the associated 100-foot buffer zone that is likely to destroy or otherwise impair the isolated vegetated wetland.

(2) 25-foot no-disturbance zone. Work within the area extending 25 feet from the edge of the isolated vegetated wetland shall be subject to the 25-foot no-disturbance zone standards and demarcation requirements set forth in § 565-10D(2).