**TOWN OF WEST TISBURY**

CONSERVATION COMMISSION

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June 2021

Attn: MEPA Office

The Honorable Matthew Beaton, Secretary

Executive Office of Energy and Environment al Affairs

100 Cambridge Street, Suite 900

Boston, MA 02114

RE: Final Environmental Impact Report/ Environmental Assessment for Capital Improvement Plan
EEA # 15964

Martha's Vineyard Airport Projects, Edgartown and West Tisbury

Dear Secretary Beaton,

The West Tisbury Conservation Commission (WT ConComm) would like to go on record as being concerned with the following aspects of the current airport expansion proposal as set forth in the final Environmental Impact Report submitted by the Martha’ Vineyard Airport Commission on June 9, 2021.

The West Tisbury Conservation Commission does not take issue with capital improvements to enhance airport safety, nor with items mandated by the FAA which, if unaddressed, may jeopardize airport operations.

The Commission does, however, have grave concerns with new commercial activities which eliminate Priority Habitat of Rare Species.

The airport’s need to generate revenue should not take precedence over its duty of environmental stewardship, any more than it does for other businesses operating in this state under legislation that has been thoughtfully and scientifically crafted by the people’s representatives.

The Commission is alarmed by previous and proposed work ~~unpermitted by MEPA~~, entirely unrelated to safe aviation operations, some of which has already occurred in Priority Habitat of Rare Species. This speaks to entrenched flaws in airport management’s approach to environmental stewardship.

 The report discloses that two lots, 34 and 38, in the airport commercial area were cleared without permitting, adding impervious surface and destroying Priority Habitat.  The report fails to address the administrative failure which led to this violation of Massachusetts law, nor what steps have been put in place to prevent future violations of the MEPA process. [See sheet on the MEPA process.]

 ~~A mention of future~~ The Commission would like further details on the “sufficient mitigation” for the unpermitted work on these lots ~~provides no details and is unreassuring to this Commission.~~ Absent further details, the Commission opposes retrospective permitting.  All on-going construction (should cease on lot 34 until permitting is secured. If not secured, the land should be restored and revegetated. (

*Note to members: Lot 34 is 0.77 acre (225x150). It is cleared and graded but not leased. Do we know for a fact that construction is happening on this lot?*

This Commission opposes the construction of two new hangars and 25 related car spaces, together requiring one acre of Priority Habitat be converted to impervious surface and a further 0.7acre disturbed for stormwater management. This proposed development is neither an operational necessity nor a safety issue.  Further, the report states that the hangars “would not affect the number of aircraft or their flight patterns.”  The Commission finds this to be disingenuous as it has been widely reported that a proposed client, unidentified in the document, is in fact Vineyard Wind, which would indicate a significant increase in helicopter traffic.  The hangars also will increase consumption of water, electricity and heating fuel and add to the production of wastewater.  While the report states that this will not exceed existing capacity, the airport’s history of mismanagement of PFAS belies such reassurance.

[I suggest the board not include the highlighted wording.]

While the Commission appreciates the need for airspace vegetation management, it is concerned that some of the work proposed is in areas of the State Forest where the airport at present has no easements, and where the FAA currently does not mandate such work. How will the Division of Conservation and Recreation assure that the removal of mature trees in the State Forest ~~should~~ will be strictly limited to current FAA mandates? Further, we are concerned by the scant detail regarding mitigation efforts for proposed large scale tree removal which may require up to 56.6 acres of new easements. While the document mentions potential land swaps on parcels abutting and non-abutting the State Forest, the information about the feasibility of these acquisitions is vague and there is no mention of a replacement planting program to partially compensate for the potential loss of hundreds of mature trees.

 The document states that the habitat impacted by such work “is still abundant on the island and Cape Cod.”  This statement betrays ignorance of the significance of Manuel F. Correllus State Forest, the focus of one of the largest environmental restoration projects in the country. It is a collection of diverse habitats including coastal pine barrens, grasslands, woodlands, and globally rare coastal heathlands. This area, unlike much of the island, was spared from clearing for agricultural purposes in past centuries and now is home to numerous rare species.

Finally, because the Commission is involved in island-wide efforts to fight the effects of climate change, it is important to go on record in opposition to general expansion of the airport, in particular the terminal building.  The proposed terminal expansion will consume more water and energy than the current building. While demand for travel to the island will inevitably increase, there must be a limit to what can be expected from a small rural airport.  For example, we do not think that the existing seasonal waiting area is so unfit for purpose that it requires enclosure and three-season cooling/heating. The document says that existing conditions “exasperate the peak passengers,” yet offers no documentation to support this assertion. Indeed, many visitors report enjoying the novelty of the outside waiting area.  Certainly, the level of exasperation has been insufficient to deter increasing numbers arriving here.  For most of the year, the number of waiting passengers is a maximum of nine. A major expansion of the waiting area for a two-month peak period seems a wasteful use of water and energy, despite the document’s blithe assurance that “these are not in short supply.”

 [ Just my opinion but the highlighted comments are more suited to a personal letter from those who are speaking from personal experience at the airport.]

Thank you for the opportunity to comment on the plan. We await answers to the questions and concerns set forth in this letter.

signature