

**Table 6. Consistency with Applicable Minimum Performance Standards**

| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes  | Additional Discussion |
|--|---------------------------|--|-----------------------|
| <b>Issue Area: LAND USE</b>  |                           |  |                       |
| LU1.1 Development Location   | Not Applicable            | Although the Airport is located in an area designated as <i>Resource Protection Area</i> on Provincetown's land use Vision Map, the Project is within the airport lease area, an identified aviation land use under Special Use Permits issued by the National Park Service. | No further discussion |
| LU1.2 Compact Development  | Not Applicable            | Project site is a commercial airport and proposed project is within the developed Airport Operating Area (AOA) and adjacent to existing parking lot.   | No further discussion |
| LU1.3 (BDP) Redevelopment/Reuse  | Not Applicable            | Project is not a change in use.  | No further discussion |
| LU1.4 (BDP) Reuse of Historic Buildings                                    | Not Applicable            | No historic buildings on site.   | No further discussion |
| LU1.5 (BDP) Location of Municipal Offices                                  | Not Applicable            | Not a municipal office.  | No further discussion |
| LU2.1 Connections to Existing Infrastructure                               | Not Applicable            | Maintenance and improvement of existing aviation infrastructure.   | No further discussion |
| LU2.2 Co-location of Telecommunication Facilities                          | Not Applicable            | Not a wireless telecommunication facility.   | No further discussion |
| LU2.3 (BDP) Co-locate Public Infrastructure                                | Not Applicable            | Does not involve rights-of-way. Project within airport lease area.   | No further discussion |
| LU2.4 (BDP) Access to Emergency Responders                                 | Not Applicable            | Not a wireless facility.   | No further discussion |
| LU3.1 Buffers to Agricultural Uses   | Not Applicable            | Not adjacent to rural landscape.   | No further discussion |
| LU3.2 Impacts to Agricultural Lands  | Not Applicable            | Not on or adjacent to agricultural lands.  | No further discussion |
| LU3.3 Best Management Practices  | Not Applicable            | Not on or adjacent to agricultural lands.  | No further discussion |

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| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes  | Additional Discussion   |
|--|---------------------------|--|---|
| <b>Issue Area: ECONOMIC DEVELOPMENT</b>                                    |                           |  |   |
| ED1.1 Location in Economic Centers   | Not Applicable            | Project is the maintenance and improvement of existing aviation infrastructure.  | No further discussion   |
| ED1.2 Industrial and Service Trade Areas                                   | Not Applicable            | Project is not located in an industrial or Service Trade Area. Project involves the maintenance and improvement of existing aviation infrastructure. | No further discussion   |
| ED1.3 Waiver   | Not Applicable            | Project is the maintenance and improvement of existing aviation infrastructure.  | No further discussion   |
| ED1.4 Resource-based Economic Areas  | Consistent                | Does not impair function of adjacent recreation land. CIP project is within Airport lease area.  | Hunting and other access will continue on portions of the airport lease area not within the proposed perimeter fence. |
| ED2.1 Gaming   | Not Applicable            | Project does not involve gaming.   | No further discussion   |
| ED2.2 (BDP) Quality Employment Opportunities                               | Not Applicable            | Airport staffing will remain the same; project will not increase airport capacity..  | No further discussion   |
| ED2.3 (BDP) Employee Housing   | Not Applicable            | Not a commercial development.  | No further discussion   |
| ED3.1 (BDP) Local Labor and Service Providers                              | Consistent                | Procurement requirements apply to municipal projects.  | Local qualified contractors will be selected for construction and maintenance as practicable.                         |
| ED3.2 (BDP) Local Ownership  | Not Applicable            | Project is a Municipal DRI. Airport is owned by the Town of Provincetown.  | No further discussion   |
| ED3.3 (BDP) Diverse Employment Opportunities                               | Not Applicable            | Project is a Municipal DRI. The Town provides employment opportunities.  | No further discussion   |
| ED3.4 (BDP) Regional Export Growth   | Not Applicable            | Project is a Municipal DRI. The project does not involve exporting goods or services.  | No further discussion   |
| ED3.5 (BDP) Regional Import Substitution                                   | Not Applicable            | The project does not involve exporting goods or services.  | No further discussion   |
| ED3.6 (BDP) Value-added Manufacturing                                      | Not Applicable            | Project is a Municipal DRI. The aviation infrastructure project does not involve manufacturing.  | No further discussion   |
| ED3.7 (BDP) Local Fiscal Impact  | Not Applicable            | Project is a Municipal DRI. The Airport contributes to the local economy.  | No further discussion   |

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| ED4.1 Demonstrated Need and Public Benefit                                 | Consistent                | CIP project responds to the need to maintain the Airport and provide safety, security, and facility improvements.          | See Design Narrative   |
| ED4.2 (BDP) Telecommunication Access                                       | Not Applicable            | Wireless service is currently provided at the Airport.   | Project does not involve a change to telecommunication infrastructure.   |
| ED4.3 (BDP) Reliable Emergency Access                                      | Not Applicable            | Project does not involve telecommunications infrastructure.  | No further discussion  |
| ED4.4 (BDP) Quality of Service   | Not Applicable            | Project does not involve telecommunications infrastructure. Wireless service is provided at the Airport.                   | No further discussion  |
| <b>Issue Area: WATER RESOURCES</b>   |                           |  |  |
| WR1.1 Five-ppm Nitrogen Loading Standard                                   | Consistent                | Addressed through LID stormwater management practices.   | Existing nitrogen loading is 0.39 ppm; proposed nitrogen loading is 0.38 ppm (see Nitrogen Loading Calculations and Stormwater Report) |
| WR1.2 Identification of Drinking Water Wells                               | Not Applicable            | Town drinking water supply is used at Airport. No known drinking water wells within 400 feet.                              | No further discussion  |
| WR1.3 Groundwater Study Requirement  | Not Applicable            | No groundwater withdrawals. Airport is on municipal water.   | No further discussion  |
| WR1.4 Cluster Development  | Not Applicable            | Project is not a subdivision.  | No further discussion  |
| WR1.5 Turf and Landscape Management Plan                                   | Consistent                | Native and drought resistant plants will be used for landscaping. Fertilizers and pesticides are not used at the Airport.  | See Project Plans for proposed landscape plantings   |
| WR1.6 (BDP) Management of Water Withdrawals/Wastewater Discharges          | Consistent                | Airport is on municipal water supply. Existing septic system will be maintained and is in compliance with current Title 5. | No change in water supply use or septic system discharge   |
| WR1.7 (BDP) Use of Water-conservation Technologies                         | Not Applicable            | Overall water use at the Airport will not change.  | No further discussion  |

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| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes   | Additional Discussion   |
|--|---------------------------|---|---|
| WR1.8 (BDP) Alternatives to Chemical Fertilizers and Pesticides            | Consistent                | Fertilizers and pesticides are not used at the Airport. Herbicides may be used for invasive species management as a resource area mitigation as permitted by regulatory agencies and NPS.                                   | Herbicides proposed for <i>Phragmites</i> management for resource enhancement; plan to be reviewed by regulatory agencies and NPS |
| WR1.9 (BDP) Greater Protection of Groundwater/Surface Water                | Consistent                | Stormwater management system for proposed Phase 1 parking lot expansion will improve protection of water quality, both surface and groundwater  | CIP will result in overall reduction in impervious surface.   |
| WR1.10 (BDP) Wastewater and Stormwater Reuse.                              | Not Applicable            | Airport facilities do not require irrigation.   | No further discussion   |
| WR2.1 Five-ppm Nitrogen Loading Standard                                   | Not Applicable            | Airport is not within a Wellhead Protection or Potential Water Supply Area.   | A slight reduction in nitrogen loading will be achieved – see Nitrogen Loading calculations and Stormwater Management Report.     |
| WR2.2 Prohibition on Hazardous Materials/Wastes                            | Not Applicable            | Existing septic system; proposed project is not within a wellhead protection area. Additionally, fuel and other aviation materials are handled under an approved Spill Prevention Control and Countermeasures Plan (SPPCP). | No further discussion   |
| WR2.3 Restrictions on Public and Private Wastewater Treatment Facilities   | Not Applicable            | Existing septic system and proposed project is not within a wellhead protection area.   | No further discussion   |
| WR2.4 Prohibited Uses under State Regulations                              | Not Applicable            | Airport is not within a Zone II.  | No further discussion   |
| WR2.5 Future Well Site Restrictions  | Not Applicable            | Airport is not within a future well site.   | No further discussion   |
| WR2.6 One-ppm Nitrogen Loading Standard                                    | Not Applicable            | Airport is not within a mapped Wellhead Protection and Potential Water Supply Area  | No further discussion   |
| WR3.1 Critical Nitrogen Load Standard for Development                      | Not Applicable            | Critical nitrogen loads have not been determined for this estuary/embayment.  | No further discussion   |

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|--|---------------------------|--|---|
| WR3.2 Maintenance or Improvement of Nitrogen Loading                       | Not Applicable            | Levels of existing nitrogen loading will not change.   | The general area within the vicinity of the Airport lease area is not listed on the Massachusetts Year 2014 Integrated List of Waters as impaired and is not known to have marine water quality problems. |
| WR3.3 Local Management Plans   | Not Applicable            | There are no Commission-approved management plans for this embayment/estuary.  | No further discussion   |
| WR3.4 Nitrogen Offset Contribution   | Not Applicable            | Levels of existing nitrogen loading will not change.   | No further discussion   |
| WR3.5 Monetary Contribution  | Not Applicable            | Levels of existing nitrogen loading will not change.   | No further discussion   |
| WR3.6 Public and Private Wastewater Treatment Facilities                   | Not Applicable            | Public and private wastewater treatment facilities will not be constructed as part of this project.                                | No further discussion   |
| WR4.1 Limits on Subsurface Disposal Systems                                | Not Applicable            | Airport is not within an identified freshwater recharge area. Not within 300 feet of a freshwater pond.                            | No further discussion   |
| WR4.2 Monetary Contribution  | Not Applicable            | Not within an identified freshwater recharge area. Not within 300 feet of a freshwater pond.                                       | No further discussion   |
| WR4.3 Public and Private Wastewater Treatment Facilities                   | Not Applicable            | Not within an identified freshwater recharge area. Not within 300 feet of a freshwater pond.                                       | No further discussion   |
| WR5.1 Nitrogen Loading Standard  | Not Applicable            | Proposed project is not within a wellhead protection area and there is not an identified marine water quality standard.            | No further discussion   |
| WR5.2 Public and Private Wastewater Treatment Facilities                   | Not Applicable            | Proposed project is not within a wellhead protection area or recharge area.  | No further discussion   |
| WR5.3 Monetary Contribution in Designated Mapped Areas                     | Not Applicable            | Proposed project is not within a Designated Mapped Areas.  | No further discussion   |
| WR5.4 Nitrogen Loading Standard in Impaired Areas                          | Not Applicable            | Airport property is not listed on the Massachusetts Year 2014 Integrated List of Waters and is not identified as an Impaired Area. | No further discussion   |
| WR5.5 Alternative Water Supply in Designated Mapped Areas                  | Not Applicable            | Proposed project is not within a Designated Mapped Areas.  | No further discussion   |

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| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs)   | Applicability/Consistency | Notes  | Additional Discussion  |   |
|--|---------------------------|--|--|---|
| WR5.6 (BDP) Chapter 21E Site Assessments                                     | Not Applicable            | Airport is not a 21E site.   | No further discussion  |   |
| WR5.7 (BDP) Reduction of Nitrogen Loading in Water Quality Improvement Areas | Not Applicable            | Proposed project is not within a Water Quality Improvement Area  | No further discussion  |   |
| WR6.1 Private Wastewater Treatment Facilities                                | Not Applicable            | The project is not proposing a public or private wastewater treatment facility and site does not have a wastewater treatment facility. Airport is serviced by an existing septic system. | No further discussion  |   |
| WR6.2 Tertiary Treatment   | Not Applicable            | The project is not proposing a public or private wastewater treatment facility and site does not have a wastewater treatment facility. Airport is serviced by an existing septic system. | No further discussion  |   |
| WR6.3 Hydrologic Balance   | Not Applicable            |  | No further discussion  |   |
| WR6.4 Development Density Limitations  | Not Applicable            |  | No further discussion  |   |
| WR6.5 Ownership and Maintenance of Treatment Facilities                      | Not Applicable            |  | No further discussion  |   |
| WR6.6 Restrictions in FEMA Flood Zones/Other Sensitive Areas                 | Not Applicable            |  | No further discussion  |   |
| WR6.7 Long-term Ownership of Treatment Facilities                            | Not Applicable            |  | No further discussion  |   |
| WR6.8 Sludge Disposal  | Not Applicable            |  | The project is not proposing a public or private wastewater treatment facility and site does not have a wastewater treatment facility. Airport is serviced by an existing septic system. | No further discussion   |
| WR6.9 Operation, Monitoring, and Compliance Agreement                        | Not Applicable            |  |  | No further discussion   |
| WR6.10 Improvement of Existing Wastewater Treatment                          | Not Applicable            |  |  | No further discussion   |
| WR6.11 Water Quality Remediation   | Not Applicable            |  |  | This is not an area of high density development with numerous failing septic systems. The Airport septic is properly working and Title 5 compliant. |
| WR7.1 No New Direct Discharges of Untreated Stormwater                       | Consistent                | There will be no new direct untreated discharges of stormwater.  | Stormwater bioretention areas and swales are proposed to capture, treat, and infiltrate parking lot runoff, as shown on project plans and in Stormwater Report.                          |   |

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| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes   | Additional Discussion   |
|--|---------------------------|---|---|
| WR7.2 On-Site Infiltration   | Consistent                | On-site infiltration proposed for roadway and parking lot runoff associated with the Phase 1 Auto Parking Expansion.  | Bioretention areas will be installed to accommodate new impervious surfaces; water quality infiltration swale will be installed between existing rows of gravel parking spaces. |
| WR7.3 Roof Runoff  | Not Applicable            | No change to existing roof runoff proposed.   | No further discussion   |
| WR7.4 Biofiltration Practices  | Consistent                | Stormwater management is proposed in the form of permeable pavement and bioretention basins, and has been designed to accommodate the first 1-inch of flow.   | Stormwater management BMPs have been designed and will be constructed in accordance with the Massachusetts Stormwater Management Standards (MASWMS) for redevelopment.          |
| WR7.5 Structured Infiltration Devices                                      | Consistent                | Stormwater management measures have been designed in accordance with the Massachusetts Stormwater Management Standards for both new and re-development. The parking lot is designed to be permeable with no runoff; under frozen conditions, runoff will flow to the bioretention cells, designed for redundancy, and sized to accommodate the 25-year 24-hour storm. | See Stormwater Management Report and Project Plans  |
| WR7.6 Impervious Surfaces  | Consistent                | Proposed parking lot will include a permeable pavement drive aisle and gravel paver parking spaces. Overall, the CIP Project will result in a net reduction in impervious surfaces.   | Overall net reduction in impervious surface; see Stormwater Management Report   |
| WR7.7 Structured Infiltration Device                                       | Not Applicable            | Project not in mapped areas.  | No further discussion   |
| WR7.8 Minimum Two-foot Separation to Groundwater                           | Flexibility               | Proposed stormwater management structures have been designed in accordance with the Massachusetts Stormwater Management Standards for both new and re-development. On average the permeable parking lot will maintain a two to three-foot separation between points of infiltration and high groundwater.   | See Project Plans<br>Flexibility requested  |
| WR7.9 Best Management Practices during Construction                        | Consistent                | Erosion control is depicted on site plans and will be implemented during construction.  | See Project Plans   |
| WR7.10 Stormwater Maintenance and Operation Plan                           | Consistent                | An O&M plan is provided in the Stormwater Management Report. The SWPPP Plan will be revised and updated after facilities are constructed.   | See Stormwater Management Report  |

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|---|----------------------------------|--|--|
| WR7.11 Shut-off Valve in Wellhead Protection Areas                                | Not Applicable                   | Airport is not within a Wellhead Protection Area.  | No further discussion  |
| WR7.12 (BDP) Road Widths  | Not Applicable                   | Public roadway not proposed.   | No further discussion  |
| <b>Issue Area: COASTAL RESOURCES</b>  |                                  |  |  |
| CR1.1 Public Access   | Not Applicable                   | Project not located on shore, nor will it impair access to the coast.  | No further discussion  |
| CR1.2 Public Access to Beach Nourishment Sites                                    | Not Applicable                   | Project is not a beach nourishment site.   | No further discussion  |
| CR1.3 Maritime Industry   | Not Applicable                   | Project does not involve water-dependent facilities.   | No further discussion  |
| CR1.4 Maritime Aesthetics   | Not Applicable                   | Terminal Building project element to be deferred for further design.   | No further discussion  |
| CR1.5 Walkways (BDP)  | Not Applicable                   | Project is not immediately adjacent to shoreline and will not incorporate walkways for shoreline access.   | No further discussion  |
| CR1.6 Coastal Structures (BDP)  | Not Applicable                   | Project does not involve coastal engineering structures.   | No further discussion  |
| CR1.7 Water-dependent Facilities (BDP)  | Not Applicable                   | Project does not involve water-dependent facilities.   | No further discussion  |
| CR2.1 Prohibiting Development in V-Zones  | Not Applicable                   | Project not located within V-Zone.   | No further discussion  |
| CR2.2 Accommodating Relative Sea-Level Rise                                       | Not Applicable                   | Terminal Building project element to be deferred for further design.   | No further discussion  |
| CR2.3 Migration of Coastal Resources  | Consistent                       | Project will not impede landward migration of coastal resources. Well-vegetated, low-lying dunes are not actively migrating in this area.  | See Technical Report on Coastal Dunes (March 2015)   |
| CR2.4 Damage Prevention and Flood Minimization                                    | Consistent                       | Proposed project is designed to accommodate CR 2.2. Fill for parking lot constitutes less than 0.015% of available flood storage capacity within surrounding coastal flood basin and will maintain flood damage prevent and flood control functions. | See Coastal Floodplain Memo (HW, January 2013 and Technical Report on Coastal Dunes (March 2015) |
| CR2.5 Barrier Beaches, Coastal Dunes and their Buffers                            | Not Applicable                   | Existing structures do not occur on coastal dunes or barrier beaches.  | No further discussion  |
| CR2.6 Coastal Banks and Their Buffers   | Not Applicable                   | Proposed project not within a Coastal Bank or its buffer.  | No further discussion  |
| CR2.7 Disaster within A- and V-Zones  | Not Applicable                   | Project is not disaster-related.   | No further discussion  |

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|---|---------------------------|--|--|
| CR2.8 Public Infrastructure in Land Subject to Coastal Storm Flowage        | Flexibility               | The entire Airport is within LSCSF, and there is no feasible alternative location outside of the coastal flood zone for the CIP Project. Phase 1 parking is the minimum needed to meet existing and projected demand, and is not intended to result in promotion of new growth and development in coastal floodzone.   | See Technical Report on Coastal Dunes (March 2015)<br>Flexibility requested                      |
| CR2.9 Dredged Material  | Not Applicable            | Project does not involve beach nourishment or disposal of dredge spoils.   | No further discussion  |
| CR2.10 General Exceptions   | Consistent                | Project involves maintenance of existing public infrastructure intended to comply with FAA, MassDOT, and TSA safety standards. Entire Airport is within LSCSF, and project is designed to minimize adverse impacts and to mitigate for resource impacts. Project will result in a net reduction of impervious surface. | See Design Narrative and Project Narrative   |
| CR2.11 Beach Nourishment Site Conditions                                    | Not Applicable            | Project does not involve beach nourishment.  | No further discussion  |
| CR2.12 Beach Nourishment – Site Monitoring                                  | Not Applicable            | Project does not involve beach nourishment.  | No further discussion  |
| CR2.13 Remove Development from Coastal Floodplains (BDP)                    | Consistent                | Project will result in a net decrease in impervious surface. Not feasible to remove existing aviation facility.  | There will be a net reduction in impervious surfaces at the site as a result of the CIP project. |
| CR2.14 Use Mean Sea Level Data (BDP)  | Consistent                | NAVD88 datum has been used for Phase 1 parking design.   | See Project Plans  |
| CR2.15 Calculation of Setback from Top of Coastal Bank (BDP)                | Not Applicable            | Work is not proposed in a Coastal Bank or its buffer.  | No further discussion  |
| CR3.1 Buffers to Coastal Wetlands   | Hardship                  | Existing buffers are overlapping with Airport infrastructure and other resource areas; project cannot be implemented without relief from this MPS. Buffer Zone interests will be protected.  | See Design Narrative and Project Narrative<br>Hardship Exemption requested                       |
| CR3.2 Septic Systems in V-Zones   | Not Applicable            | No new septic systems are being proposed in a V-Zone.  | No further discussion  |
| CR3.3 Stormwater Discharges   | Hardship                  | Stormwater treatment will be provided, due to existing constraints with wetland resources which are within 10 feet of existing parking lot, a 100-foot minimum buffer cannot be achieved for the proposed stormwater BMPs.   | See Project Plans and Stormwater Report<br>Hardship Exemption requested                          |
| CR3.4 Stormwater Management Designed to Accommodate Relative Sea-level Rise | Flexibility               | Proposed stormwater BMPs are within 300-feet of the spring high water contour and are designed to accommodate SLR to the extent practicable. A 2-3 foot separation to high groundwater is provided for infiltration, but a full 3 feet cannot be achieved due to existing grade and groundwater elevations.            | See Project Plans and Stormwater Report<br>Flexibility requested                                 |

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|--|---------------------------|--|-----------------------|
| CR3.5 Docks and Piers  | Not Applicable            | No docks or piers are proposed.  | No further discussion |
| CR3.6 New Marinas  | Not Applicable            | Project does not involve marinas.  | No further discussion |
| CR3.7 Prohibition on Improvement Dredging                                  | Not Applicable            | Project does not involve dredging.   | No further discussion |
| CR3.8 Maintenance Dredging   | Not Applicable            | Project does not involve dredging.   | No further discussion |
| CR3.9 Beneficial Reuse of Dredged Material                                 | Not Applicable            | Project does not involve dredging.   | No further discussion |
| CR3.10 Eelgrass  | Not Applicable            | Project is not within eelgrass beds.   | No further discussion |
| CR3.11 Fish, Shellfish, Crustaceans  | Not Applicable            | Project is not in marine waters and will not impact fish, shellfish, or crustaceans. | No further discussion |
| CR3.12 Aquaculture   | Not Applicable            | Project does not involve aquaculture.  | No further discussion |
| CR3.13 (BDP) Waterfront-fueling Facilities                                 | Not Applicable            | No fueling facilities.   | No further discussion |
| <b>Issue Area: MARINE RESOURCES</b>  |                           |  |                       |
| Marine Resources   | All Not Applicable        | No mining or cable/pipeline installation. No offshore development                    | No further discussion |
| MR1.1 Prohibited Areas, Sand Mining  |                           |  |                       |
| MR1.2 Prohibited Areas, cables/Pipelines                                   |                           |  |                       |
| MR1.3 Buffers to Navigation  |                           |  |                       |
| MR1.4 Operations and Maintenance Plan                                      |                           |  |                       |
| MR1.5 Emergency Response Plan  |                           |  |                       |
| MR1.6 North Atlantic Right Whale   |                           |  |                       |
| MR1.7 North Atlantic Right Whale, TOY Restrictions                         |                           |  |                       |
| MR1.8 Whales   |                           |  |                       |
| MR1.9 Sea Turtles  |                           |  |                       |
| MR1.10 Fish Resources and Habitat  |                           |  |                       |

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| MR1.11 Benthic Habitats, Direct Impacts                                    |                           |       |                       |
| MR1.12 Benthic Habitats, Indirect Impacts                                  |                           |       |                       |
| MR1.13 Benthic Habitats, TOY Restrictions                                  |                           |       |                       |
| MR1.14 Monitoring of Benthic Habitats During Construction                  |                           |       |                       |
| MR1.15 Rare Species Habitat  |                           |       |                       |
| MR1.16 Construction Noise  |                           |       |                       |
| MR1.17 Cumulative Impacts  |                           |       |                       |
| MR1.18 Coordinated Conduit Crossings                                       |                           |       |                       |
| MR1.19 Archaeological Resources  |                           |       |                       |
| MR1.20 Coastal Landforms   |                           |       |                       |
| MR1.21 Minimizing Impacts to Benthic Resources                             |                           |       |                       |
| MR1.22 Post-Construction Monitoring of Benthic Habitats                    |                           |       |                       |
| MR1.23 Coastal Waterbirds  |                           |       |                       |
| MR1.24 Sea Ducks   |                           |       |                       |
| MR1.25 Project Benefit   |                           |       |                       |
| MR1.26 Scenic Resources  |                           |       |                       |
| MR1.27 Benthic Communities   |                           |       |                       |
| MR1.28 Coastal Waterbirds  |                           |       |                       |
| MR1.29 Multi-Hazard Mitigation Plan  |                           |       |                       |

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| <b>Issue Area: WETLANDS</b>  |                           |  |   |
| WET1.1 Wetlands  | Hardship                  | Existing Airport, while not water-dependent, is located in close proximity to wetland resources. There is no alternative to the proposed project in order to address proposed safety and security standards without wetland alteration. Wetland restoration and enhancement is proposed, and wetlands interests will be protected. | See Design Narrative and Project Narrative and Plans<br><b>Hardship Exemption requested</b>   |
| WET1.2 Wetland Buffers   | Hardship                  | Existing buffers are overlapping with Airport infrastructure and other resource areas; project cannot be implemented without relief from this MPS. Buffer Zone interests will be protected.  | See Design Narrative and Project Narrative and Plans<br><b>Hardship Exemption requested</b>   |
| WET1.3 Wetlands, Buffers, and Utility Line Installation                    | Not Applicable            | Project does not involve utility maintenance.  | No further discussion   |
| WET1.4 Stormwater  | Hardship                  | Stormwater treatment will be provided, due to existing constraints with wetland resources, which are within 10 feet of existing parking lot, a 100-foot minimum buffer cannot be achieved for the proposed stormwater BMPs.  | See Project Plans and Stormwater Report<br><b>Hardship Exemption requested</b>  |
| WET1.5 Wetland Restoration (BDP)   | Consistent                | Wetland restoration is proposed as part of the overall wetland mitigation measures for all regulatory agencies. Additional wetland mitigation measures include wetland enhancement via invasive species management to restore natural plant communities.   | Wetland restoration proposed at a 1:1 ratio, through the removal of pavement wetland; wetland enhancement (invasive species management) also proposed; monitoring as described in mitigation plan |
| WET1.6 Artificial Wetlands (BDP)   | Consistent                | Bioretention areas are proposed to treat stormwater runoff associated with new parking lot and a portion of redeveloped access roadway. Stormwater BMPs will maintain or improve water quality and will not adversely impact resource areas.   | Stormwater management structures (bioretention areas) proposed for parking lot expansion project are designed to blend into the natural surroundings while still treating stormwater              |
| WET1.7 Agricultural Areas (BDP)  | Not Applicable            | There are no agricultural areas at the project site.   | No further discussion   |

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|--|---------------------------|---|---|
| <b>Issue Area: WILDLIFE AND PLANT HABITAT</b>                              |                           |   |   |
| WPH1.1 Natural Resources Inventory   | Consistent                | A Natural Resources Inventory has been compiled.  | NRI report is provided in Attachments   |
| WPH1.2 Clearing and Grading  | Consistent                | Clearing for the fence and grading for the airfield improvements and terminal parking area have been minimized to the maximum extent practicable.   | See Project Narrative and Project Plans   |
| WPH1.3 Wildlife and Plant Habitat  | Consistent                | The alignment of the proposed safety/security fence minimizes impacts to wildlife habitat and will incorporate wildlife passage “gaps” along the bottom of the fence.   | See Project Narrative and Project Plans   |
| WPH1.4 Rare Species  | Consistent                | Project has involved ongoing coordination with NHESP. NHESP comment on FEIR and MESA Project Review is provided in Attachments. The proposed fence has been designed to provide passage for Eastern Box Turtle and other small wildlife and to avoid prime breeding habitat for Eastern Spadefoot as coordinated with NHESP. Wetland mitigation is designed in part to maintain rare species habitat. | By design the purpose of the fence is to discourage deer and coyote from entering the active airport area. Hundreds of acres of the airport lease area remain open to wildlife. |
| WPH1.5 Vernal Pools  | Not Applicable            | There are no certified vernal pools in the vicinity of the project.   | No further discussion   |
| WPH1.6 Invasive Species  | Consistent                | A draft Integrated Invasive Species Management Plan has been developed.   | See Project Narrative and Attachments   |
| WPH1.7 Habitat Restoration (BDP)   | Consistent                | Non-native invasives will be managed in coastal dune areas proximal to airport infrastructure.  | See Project Narrative, Project Plans, and Attachments   |
| WPH1.8 Un-development (BDP)  | Consistent                | The project will result in a net reduction of impervious surface within areas of mapped habitat.  | See Project Narrative and Project Plans   |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes  | Additional Discussion |
|--|---------------------------|--|-----------------------|
| <b>Issue Area: OPEN SPACE PROTECTION AND RECREATION</b>                    |                           |  |                       |
|  | All Not Applicable        | Exempt municipal project with municipal purpose. | No further discussion |
| OS1.1 Clustering of Development  |                           |  |                       |
| OS1.2 Open Space Connections   |                           |  |                       |
| OS1.3 Open Space Requirements  |                           |  |                       |
| OS1.4 Sensitive Natural Resources  |                           |  |                       |
| OS1.5 Residential Cluster  |                           |  |                       |
| OS1.6 Sensitive Open Space Resources                                       |                           |  |                       |
| OS1.7 Open Space in GIZ/Economic Centers                                   |                           |  |                       |
| OS1.8 Open Space Requirements and Parking Garages                          |                           |  |                       |
| OS1.9 Location of Open Space   |                           |  |                       |
| OS1.10 Open Space Credits  |                           |  |                       |
| OS2.1 Recreation Needs   |                           |  |                       |
| OS2.2 Provision of Recreation Areas  |                           |  |                       |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes   | Additional Discussion   |
|--|---------------------------|---|---|
| <b>Issue Area: TRANSPORTATION</b>  |                           |   |   |
| TR0.1 Source(s) of Trip-generation Data                                    | Consistent                | Trip generation estimates followed procedures outlined in the Institute of Transportation Engineers' (ITE) Trip Generation, Eighth Edition, 2008 was used.  | In addition, an empirical method suggested by CCC staff was also used to more accurately reflect the unique operating characteristics of the Airport. |
| TR0.2 Traffic Credit for Past Uses   | Not Applicable            | Traffic credit not requested and not needed because of no change in use.  | No further discussion   |
| TR0.3 Permits for Roadwork prior to Construction                           | Not Applicable            | No permits needed for road work or transportation mitigation.   | No further discussion   |
| TR0.4 Alternative Method for Compliance within Economic Centers            | Not Applicable            | Project is not in Economic Center.  | No further discussion   |
| TR0.5 Incentive for Mixed Use Development in Economic Centers              | Not Applicable            | Project is not a residential/office development in Economic Center.   | No further discussion   |
| TR1.1 No Degradation of Safety   | Consistent                | Safety will be maintained for all transportation modes. Pavement markings and signage at the intersection of the bike path with Airport Road and the employee parking access drive will be refreshed. | See Project Plans   |
| TR1.2 Crash Frequency at Key Locations                                     | Not Applicable            | Project will not increase traffic by 25 trips; access >2 miles from Route 6.  | No further discussion   |
| TR1.3 Identification of Safety Impacts                                     | Not Applicable            | Intersection locations do not have threshold crash numbers and project will not increase traffic by 25 trips.   | No further discussion   |
| TR1.4 Standards for Driveway Construction                                  | Not Applicable            | No change to existing driveway.   | No further discussion   |
| TR1.5 Route 6 Access/Egress  | Not Applicable            | Not located along Route 6.  | No further discussion   |
| TR1.6 Sight-distance Obstructions  | Consistent                | Lights will be full cutoff. No new signs proposed. Landscaping will not create obstructions to sight distance for all modes, but rather serve to screen parking lot from Park users.                  | See Project Plans   |
| TR1.7 Bicyclists and Pedestrians Safety and Access/Egress Requirements     | Consistent                | No change to existing driveway and bike path.   | Signage will continue to be provided for motorists and bicyclists; see also Project Plans   |
| TR1.8 Sight-distance requirements  | Not Applicable            | Existing sight distance maintained. Landscaping will not impact sight distance.   | No further discussion   |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| <b>Minimum Performance Standards (MPSs) and Best Development Practices (BDPs)</b> | <b>Applicability/Consistency</b> | <b>Notes</b>   | <b>Additional Discussion</b>  |
|---|----------------------------------|--|---|
| TR1.9 Mitigation Timing   | Not Applicable                   | Mitigation not required.   | No further discussion   |
| TR1.10 (BDP) Transportation Safety  | Consistent                       | Project includes safety/security improvements for the Airport.   | Aviation transportation safety and access will be improved for Cape Cod   |
| TR1.11 (BDP) Curb Cuts  | Not Applicable                   | Project does not involve change in existing curb cuts.   | No further discussion   |
| TR2.1 Trip Reduction Outside Growth Incentive Zones or Economic Centers           | Not Applicable                   | Project is not designed to increase site traffic.  | No further discussion   |
| TR2.2 Trip Reduction Inside Growth Incentive Zones or Economic Centers            | Not Applicable                   | Not in growth incentive zone.  | No further discussion   |
| TR2.3 Interconnection   | Not Applicable                   | Existing connections to bike path and informal path to beach.  | No further discussion   |
| TR2.4 Incentives for Connections between Adjacent Properties                      | Not Applicable                   | No adjacent properties for site traffic.   | No further discussion   |
| TR2.5 Estimating Trip Reduction   | Not Applicable                   | Project is not designed to increase site traffic. Trip reduction incentives like cab sharing are in place.           | No further discussion   |
| TR2.6 Bus Stops, Turn-outs, and Shelters  | Not Applicable                   | Airport Landside has drop off area and bus stop area.  | No further discussion   |
| TR2.7 Bicycle and Pedestrian Accommodations                                       | Not Applicable                   | Project is at Airport Site. No roadway or intersection changes. There is an existing bike path adjacent to the site. | No further discussion   |
| TR2.8 Preservation of Frontage  | Not Applicable                   | No ROW impacts/changes.  | No further discussion   |
| TR2.9 Parking Spaces  | Consistent                       | Minimum number of parking spaces is proposed.  | Proposed increase in parking capacity is within accepted guidelines for the existing and proposed conditions; see Project Narrative and Project Plans |
| TR2.10 Acceptable Trip-reduction Strategies                                       | Not Applicable                   | Not Applicable   | No further discussion   |
| TR2.11 Other Trip-reduction Strategies  | Not Applicable                   | Not Applicable   | No further discussion   |
| TR2.12 Trip-generation Credit   | Not Applicable                   | Not Applicable   | No further discussion   |
| TR2.13 Inflation Factor   | Not Applicable                   | Not Applicable   | No further discussion   |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| <b>Minimum Performance Standards (MPSs) and Best Development Practices (BDPs)</b> | <b>Applicability/Consistency</b> | <b>Notes</b>  | <b>Additional Discussion</b>          |
|---|----------------------------------|---|---------------------------------------|
| TR2.14 Use of Trip-reduction Funds  | Not Applicable                   | Not Applicable  | No further discussion                 |
| TR2.15 Bike Racks and/or Storage  | Consistent                       | Bike racks are provided.  | See Project Plans and Attachments     |
| TR2.16 Alternate Modes of Travel  | Consistent                       | Breeze bus services the Airport.  | Cab share program provided at Airport |
| TR2.17 Buffers around Airports  | Not Applicable                   | Airport is within National Seashore.  | No further discussion                 |
| TR2.18 Rail and Marine Freight Shipment   | Not Applicable                   | Not rail or marine freight.   | No further discussion                 |
| TR2.19 Preferred Parking Spaces for Car/Van Pools                                 | Not Applicable                   | Not office or industrial use.   | No further discussion                 |
| TR2.20 Parking Structures   | Not Applicable                   | Project is not in Economic Center.  | No further discussion                 |
| TR2.21 Shared Parking   | Not Applicable                   | Not Applicable  | No further discussion                 |
| TR3.1 Operational Requirements  | Consistent                       | Operations have been analyzed. No measurable effect on the network operation within, and outside of, the study area as a result of the minimal projected increase in traffic. | Traffic Study provided in Attachments |
| TR3.2 Credit for Trip-reduction Mitigation  | Not Applicable                   | Not seeking credit.   | No further discussion                 |
| TR3.3 Traffic Studies   | Consistent                       | Traffic studies have been completed and reviewed by CCC staff.  | Traffic Study provided in Attachments |
| TR3.4 Mitigation of Congestion Impacts Required                                   | Not Applicable                   | No adverse impacts.   | No further discussion                 |
| TR3.5 Mitigation Fee  | Not Applicable                   | No impact locations. No mitigation fee required.  | No further discussion                 |
| TR3.6 "Fair-Share" Payments   | Not Applicable                   | No impacts.   | No further discussion                 |
| TR3.7 Restrictions on Road Widening or New Signals                                | Not Applicable                   | No road widening required.  | No further discussion                 |
| TR3.8 Year-round Structural Mitigation  | Not Applicable                   | No road widening required.  | No further discussion                 |
| TR3.9 Bicycle and Pedestrian Accommodation  | Not Applicable                   | No road widening required.  | No further discussion                 |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| <b>Minimum Performance Standards (MPSs) and Best Development Practices (BDPs)</b> | <b>Applicability/Consistency</b> | <b>Notes</b>  | <b>Additional Discussion</b>  |
|---|----------------------------------|---|---|
| TR3.10 Preserve Existing Rights-of-Way  | Not Applicable                   | No change in ROW.   | No further discussion   |
| TR3.11 No Capacity Increases on Controlled-access Highways                        | Not Applicable                   | No change in mainline capacity.   | No further discussion   |
| TR3.12 Consistency with Other Plans   | Not Applicable                   | No mitigation required.   | No further discussion   |
| TR3.13 Operation and Maintenance Costs  | Not Applicable                   | No proposed signals.  | No further discussion   |
| TR3.14 Traffic-monitoring Devices   | Not Applicable                   | No proposed roadway improvements as mitigation.   | No further discussion   |
| TR3.15 Inflation Factor   | Not Applicable                   | No mitigation required.   | No further discussion   |
| TR3.16 Use of Congestion Mitigation Funds   | Not Applicable                   | No funds required.  | No further discussion   |
| TR3.17 Automatic Data Collection  | Not Applicable                   | No proposed roadway improvements as mitigation.   | No further discussion   |
| TR3.18 Consistency with Federal and State Plans                                   | Not Applicable                   | No mitigation required.   | No further discussion   |
| <b>Issue Area: WASTE MANAGEMENT</b>   |                                  |   |   |
| WM1.1 Hazardous Materials/Waste Restrictions                                      | Not Applicable                   | Not within wellhead protection area.  | No further discussion   |
| WM1.2 Credit for Redevelopment  | Not Applicable                   | Not within wellhead protection area.  | No further discussion   |
| WM1.3 Credit for Removal of Development   | Not Applicable                   | Not within wellhead protection area.  | No further discussion   |
| WM1.4 Pollution Prevention and Emergency Response Plan                            | Not Applicable                   | Not within wellhead protection area.  | No further discussion   |
| WM1.5 Compliance with Massachusetts Hazardous Waste Regulations                   | Consistent                       | Airport is not a generator of hazardous wastes, except for small amounts of oil and gasoline. | The Airport has a SPCCP to manage the small amounts of hazardous materials; see Attachments |
| WM1.6 (BDP) Elimination of Hazardous Materials/Waste                              | Consistent                       | Airport is not a generator of hazardous wastes, except for small amounts of oil and gasoline. | The Airport has a SPCCP to manage the small amounts of hazardous materials; see Attachments |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes   | Additional Discussion |
|--|---------------------------|---|-----------------------|
| WM2.1 Construction Waste   | Consistent                | Construction and demolition waste handling is part of all construction contracts. | No further discussion |
| WM2.2 C&D Waste Plan   | Consistent                | Removed pavement will be recycled.  | No further discussion |
| WM2.3 Post-construction Waste  | Consistent                | Airport has plan for waste disposal and recycling.                                | No further discussion |
| WM2.4 Food Waste Recycling   | Not Applicable            | Airport only has vending machines.  | No further discussion |
| <b>Issue Area: ENERGY</b>  |                           |   |                       |
| E1.1 Redevelopment Energy Audit  | Not Applicable            | Not Applicable. Terminal Building is deferred.                                    | No further discussion |
| E1.2 Designed to Earn ENERGY STAR® Certification                           | Not Applicable            | Not Applicable.   | No further discussion |
| E1.3 ANSI/LEED Standards   | Not Applicable            | Not Applicable.   | No further discussion |
| E1.4 Multi-Family Projects   | Not Applicable            | Not Applicable.   | No further discussion |
| E1.5 On-site Renewable Energy Generation                                   | Not Applicable            | Not Applicable.   | No further discussion |
| E1.6 Alternative Method of Meeting MPS E1.1 through E1.5                   | Not Applicable            | Not Applicable.   | No further discussion |
| E1.7 Clear Area  | Not Applicable            | Project is not a turbine.   | No further discussion |
| E1.8 Noise   | Not Applicable            | Project is not a turbine.   | No further discussion |
| E1.9 Shadow Flicker  | Not Applicable            | Project is not a turbine.   | No further discussion |
| E1.10 Decommissioning  | Not Applicable            | Project is not a turbine.   | No further discussion |
| E1.11 Municipal WECF Waiver  | Not Applicable            | Project is not a turbine.   | No further discussion |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes                             | Additional Discussion |
|--|---------------------------|-----------------------------------|-----------------------|
| <b>Issue Area: AFFORDABLE HOUSING</b>                                      |                           |                                   |                       |
|  | All Not Applicable        | Project is not a housing project. | No further discussion |
| AH1.1 Residential Requirement  |                           |                                   |                       |
| AH1.2 Ten-percent Requirement for Subdivisions of 10-plus Lots             |                           |                                   |                       |
| AH1.3 Cash-contribution Option   |                           |                                   |                       |
| AH1.4 Calculation of Affordable Units                                      |                           |                                   |                       |
| AH1.5 Off-site Option Criteria   |                           |                                   |                       |
| AH1.6 Location of Off-site Option  |                           |                                   |                       |
| AH1.7 Timing of Off-site Contributions                                     |                           |                                   |                       |
| AH1.8 Timing and Mix of Affordable Units                                   |                           |                                   |                       |
| AH1.9 Integration and Size of Affordable Units                             |                           |                                   |                       |
| AH1.10 ENERGY STAR <sup>®</sup> Requirement                                |                           |                                   |                       |
| AH1.11 Pricing and Rents of Affordable Units                               |                           |                                   |                       |
| AH1.12 Permanent Affordability   |                           |                                   |                       |
| AH1.13 Monitoring of Affordability   |                           |                                   |                       |
| AH1.14 No Reduction in Number of Existing Units                            |                           |                                   |                       |
| AH1.15 (BDP) Location of Affordable Housing                                |                           |                                   |                       |
| AH1.16 (BDP) Priority for Affordable Rental Housing                        |                           |                                   |                       |
| AH1.17 (BDP) Moderate-income Homeownership                                 |                           |                                   |                       |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes  | Additional Discussion                |
|--|---------------------------|--|--------------------------------------|
| AH2.1 Non-discrimination   |                           |  |                                      |
| AH2.2 Visitability and/or Accessibility Requirement                        |                           |  |                                      |
| AH2.3 Affirmative Marketing and Selection of Buyers/Tenants                |                           |  |                                      |
| AH2.4 Relocation Requirement   |                           |  |                                      |
| AH3.1 Mitigation Standard  |                           |  |                                      |
| AH3.2 Alternate Mitigation Calculation Option                              |                           |  |                                      |
| AH3.3 Annual Adjustment of Mitigation                                      |                           |  |                                      |
| AH3.4 On-site Units Option   |                           |  |                                      |
| AH3.5 Redevelopment/Change of Use  |                           |  |                                      |
| <b>Issue Area: HERITAGE PRESERVATION AND COMMUNITY CHARACTER</b>           |                           |  |                                      |
| HPCC1.1 Historic Structures  | Not Applicable            | No historic structures on site                             | No further discussion                |
| HPCC 1.2 Cultural Landscapes   | Not Applicable            | Terminal Building is deferred at this time.                | No further discussion under this DRI |
| HPCC 1.3 Archaeological Sites  | Not Applicable            | No archaeological sites on site.                           | No further discussion                |
| HPCC 1.4 (BDP) Local Preservation Efforts                                  | Not Applicable            | No historic structures on site                             | No further discussion                |
| HPCC 1.5 (BDP) Preservation Restrictions                                   | Not Applicable            | No historic structures on site.                            | No further discussion                |
| HPCC2.1 Strip Development  | Not Applicable            | No strip development.                                      | No further discussion                |
| HPCC 2.2 Protection of Existing Roadway Character                          | Not Applicable            | The character of the existing roadway will not be changed. | See Project Plans                    |
| HPCC 2.3 Avoid Adverse Visual Impacts                                      | Not Applicable            | Not Applicable.  | No further discussion                |

**Table 6 (cont.). Consistency with Applicable Minimum Performance Standards**

| Minimum Performance Standards (MPSs) and Best Development Practices (BDPs) | Applicability/Consistency | Notes   | Additional Discussion |
|--|---------------------------|---|-----------------------|
| HPCC 2.4 Consistency with Regional Context or Surrounding Distinctive Area | Not Applicable            | Not Applicable.   | No further discussion |
| HPCC 2.5 Footprints over 15,000 Square Feet                                | Not Applicable            | Not Applicable.   | No further discussion |
| HPCC 2.6 Building Forms and Façades  | Not Applicable            | Not Applicable.   | No further discussion |
| HPCC 2.7 Non-traditional Materials and Designs                             | Not Applicable            | Not Applicable.   | No further discussion |
| HPCC 2.8 Parking to the Side or Rear of Buildings                          | Not Applicable            | Existing parking is on the landside of the terminal.  | No further discussion |
| HPCC 2.9 Landscaping Improvements for Redevelopment                        | Consistent                | Landscaping buffers are provided for the parking area.  | See Project Plans     |
| HPCC 2.10 Landscape Plan Requirements                                      | Consistent                | Landscape Planting Plan provided.   | See Project Plans     |
| HPCC 2.11 Exterior Lighting  | Not Applicable            | LED lights will be used for the exterior parking facility and the TW lights.  | See Project Plans     |
| HPCC 2.12 Signage  | Not Applicable            | No new billboards or signage is proposed.   | No further discussion |
| HPCC 2.13 Underground Utilities  | Not Applicable            | Not Applicable.   | No further discussion |
| HPCC 2.14 Roadway Appurtenances  | Not Applicable            | No roadway appurtenances proposed.  | No further discussion |
| HPCC 2.15 (BDP) Conservation Restrictions for Landscapes and Viewsheds     | Not Applicable            | Project is located at an Airport within the National Seashore; opportunities for conservation restrictions not available. | No further discussion |
| HPCC 2.16 (BDP) Specimen Trees and Original Topography                     | Not Applicable            | No specimen trees on site. Original topography was modified for original construction of the Airport.                     | No further discussion |
| HPCC 2.17 (BDP) Impervious Parking Areas                                   | Consistent                | Impervious parking areas will be provided.  | See Project Plans     |
| HPCC 2.18 (BDP) Public Open Spaces, Public Art, and Related Amenities      | Not Applicable            | Not Applicable.   | No further discussion |
| HPCC 2.19 (BDP) Multiple Stores to Reduce Building Footprint               | Not Applicable            | Not Applicable.   | No further discussion |
| HPCC 2.20 (BDP) Underground Utilities                                      | Not Applicable            | Not Applicable.   | No further discussion |