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# Save Our Heritage

Protecting the birthplace of the American Revolution, the cradle of the American Environmental Movement, and the home of the American Literary Renaissance.

November 16, 2013

Ms. Kimberly Peace  
Hoyle, Tanner & Associates, Inc  
150 Dow Street  
Manchester, NH 03101

RE: Jet Aviation Draft Environmental Assessment  
Hoyle Tanner Project # 304903

Dear Ms. Peace,

We take this opportunity to provide comment on the Draft Environmental Assessment for the Jet Aviation Safety and Efficiency Improvements Project.

This project is clearly an expansion project. However, consistent with other past expansion projects at Hanscom Field, the various planning documents attempt to misleadingly describe it as a “safety and efficiency improvement” project.

The proposed Jet Aviation plans would include:

- additional 12,000 square feet (sf) of FBO space – within Lincoln wetlands buffer zone
- new 40,000 square foot hangar – within Lincoln wetlands buffer zone
- new 94,000-plus square foot ramp (2.1 acres) – within Lincoln wetlands buffer zone
- new landside access road – through Lincoln wetlands buffer zone

Our organization has worked to limit the adverse impacts of aviation and related ground travel at Hanscom Field civil airport on the surrounding historic-rich host communities, namely Bedford, Concord, Lexington and Lincoln.

Our position for decades has been to limit any growth in aviation operations, infrastructure, or the airport footprint at Hanscom Field until A) meaningful protections are in place to protect the unique historic and natural resources in the Hanscom-area host communities from further adverse impacts, and B) A regional transportation plan is in place that shows how the aviation load will be balanced among the regional airports. This position has been unanimously and consistently shared over the years by the Hanscom-area Towns and their elected Congressional and State House representatives. These conditions are not in place and without them uncontrolled piece-by-piece expansion of the airport, as has been occurring, is not in the communities interest or in the interest of our national heritage.

We have the following key concerns and comments regarding the content of the Environmental Assessment, that taken together demonstrate that the Assessment does not meet state or federal disclosure requirements.

The proposed buildings are to be constructed using LEED standards in order to minimize environmental impact. The report fails to point out that a SINGLE international flight enabled by this facility has comparable global warming impact (CO<sub>2</sub>e) to operating the proposed facility for a year. In fact, the CO<sub>2</sub>e emissions caused by flights from and to this facility will make it effectively one of the largest sources of destructive global warming emissions in the state. Failure to describe or quantify these impacts or how the proposed project enables them provides an erroneous and misleading disclosure of the impacts of this project.

The discussion regarding noise provides no meaningful disclosure regarding the impact of the project on the noise levels. Expected air traffic changes resulting from this expansion project are not disclosed. Expected changes in the ratio of based to transient aircraft and resultant impact on number of operations are not disclosed. No disclosure regarding expected increases in the quantity or mix of aircraft operations is provided. The discussion regarding noise impact metrics fail to discuss the FAA Time Above metric which is the metric the towns requested be used for future environmental disclosures and its use was endorsed by the Mass Secretary of Environmental Affairs. The TA 55db metric with 30 minute contours should be used instead of the DNL metric which the towns believe does not provide a meaningful disclosure of noise impacts (See Report of the Hanscom Field Noise Workgroup). The noise discussion provides a very misleading information when it says: "The total population exposed to Day-Night Sound Level (DNL) greater than 65 dB, which is the level typically associated with the sound of normal conversation, has decreased"; the DNL is an average metric which technically cannot be compared to the instantaneous sound level of conversation at 65dba. An airport environment with 65db DNL likely has frequent events of over 100dba which is the sound level of a Rock concert. The report is misleading regarding the impact of the noise, is not using the appropriate metric in its discussions, and does not disclose the noise impact resulting from changes in aviation operations expected from the expansion project.

The discussion regarding environmental impact makes no mention of Lead emissions. According to the EPA, Hanscom Field is one of the largest airport emitters of atmospheric lead, emitting 544kg per year (Lead Emissions From the Use of Leaded Aviation Gasoline in the United States, EPA, 2008). The EPA says that it is proven that atmospheric lead causes neurological damage to children, and to prevent IQ damage to children the environmental level should be less than 0.02

micrograms per cubic meter. The communities deserve to know what level they are being exposed to and how this exposure varies with time and location. The 100LL Avgas sold at the Jet Aviation facility contains more lead per gallon than now-illegal automotive gasoline of the 1960's. This is one of the most important pollutant emissions caused by the airport and the failure to disclose it and how it will be impacted by the project is a glaring omission that is fatal to the report.

The discussion regarding socioeconomic impact of the expansion project is misleading and fails to disclose on four important counts: First, it attempts to claim large economic benefits from direct, indirect, and induced economic impacts based on citing a Massport document. However, it is misleading because the cited analysis did not follow the FAA prescribed methodology according to the FAA document "Estimating the Regional Economic Significance of Airports". An analysis by the Commonwealth Research Group showed that if the FAA methodology is used, the actual economic benefit is approximately 70% less than claimed by Massport. Therefore the disclosure of impacts is false and inaccurate. Second, the Assessment fails to disclose the negative impact of airport expansion on local tourism and quality of life in the surrounding communities. Third, due to preferential or tax-free status of the facility as part of the airport, the facility has the potential to engage in activities such as office space, food service, etc that may directly compete with and disadvantage local businesses; the extent of these activities is not disclosed. Fourth, the discussion fails to disclose that the purpose of the aviation operations and therefore the proposed facilities is primarily for personal luxury travel for an elite group of people to resort destinations, which should be considered when balancing the benefits vs impacts of a project (according the article "Corporate Jet Set: Leisure vs. Business", Wall St Journal, June 16, 2011). The disclosures in this section of the report are both misleading and incomplete.

The discussion regarding historic impacts fails to disclose that the National Trust for Historic Preservation has listed the area surrounding Hanscom Field as one of the 11 most endangered historic sites in America BECAUSE of the uncontrolled and unplanned expansion of Hanscom Field. For the same reasons the area has been listed as a "Last Chance Landscape" by Scenic America. The failure to disclose that the project has impacts beyond the facility perimeter due to aviation and traffic, is a fatal omission in the Assessment.

The report views the project in isolation, and does not properly depict the combined and cumulative impacts when placed in the context of other planned and potential projects at the airport. At a 1/7/10 public meeting on Hangar 24, HATS Chair Jeanne Krieger stated,

"The regulatory review process for expansion by Massport condones bad planning and does not provide the communities and their residents the protection of meaningful mitigations....Each development is considered incrementally; no entity or agency looks at total potential impacts. The communities boycotted the 2005 Hanscom GEIR [and since then, the 2012 ESPR] because we recognized the futility of the regulatory process. Why are proposals for expansion at Hanscom presented to us as stand-alone projects and not in the context of total development?"

For this reason we believe the Assessment is incomplete and misleading.

During a similar Public Comment period on the future of the then still-standing historic MIT Hangar 24 at Hanscom Field, John Silva (New England FAA, Airports Division) stated in an email to the Consulting Parties:

“I am aware that our proposed findings and decisions are contrary to almost all of the comments we have received from consulting parties and the public.” (12/4/08)

Given this backdrop, public comments have been rendered exercises in futility. Their only purpose, from the perspective of the Hanscom-area communities, is to go on record with our views and concerns. The commonplace expectation that Massport, Massport’s third parties, or the FAA would actually integrate public comments into the shaping of a proposal, have been replaced with the pro forma process that now takes place. It is important to note that while the communities are provided the ability to comment on these plans, this does not make us a participant in the process, only a spectator, since the communities have no means to impact or change the outcomes. Our representative in these situations is supposed to be Massport, whose legislatively enacted charter is to act in the interest of the people of Massachusetts, not in the interest of the aviation industry; we request that Massport take this responsibility seriously.

We believe the draft Environmental Assessment for this expansion project is incomplete, inadequate, and misleading and should not be used for planning purposes in its current form.



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