

RE: PROPOSED NORTH AIRFIELD DEVELOPMENT AT HANSCOM FIELD, BEDFORD, MA

To: Melissa Hoffer, Climate Chief of the Commonwealth of Massachusetts
From: Kati Winchell, Save Our Heritage
Lynne Smith, Lincoln Climate Action Plan
Date: March 24, 2023
RE: Request to Stop Private Jet Hangar Expansion at Hanscom Field

Dear Ms. Hoffer,

We would like to bring to your attention plans for a massive private jet hangar build-out at Massport's Hanscom Field. If carried out, these plans will undercut our town, state, and national Climate Action goals at a time when climate scientists are urging us to accelerate these goals.¹

The proposed development would:

- add 495,470 sf of hangar space for 27 private jet hangars on 49.2 acres (*c.2-3 jets/hangar*)
- triple the private jet capacity at Hanscom
- reconfigure a taxiway to support larger, heavier private jets
- impact 35 Environmental Justice populations within a 5-mile radius
- add 23.9 acres of impervious paving
- clearcut mature trees (*the most efficient CO2 sequestration technology*²)
- represent the largest single development in Hanscom's history
(*Sources: ENF and Land Swap Agreement; see Attachment 1, #5 and #2*)

This would follow on the heels of eight newly-built private jet hangars that were completed in 2022 by Atlantic Aviation FBO, with Massport approval and on Massport land – in addition to three other hangars currently being built at the FBO site, each 20,000 square feet.

Climate Change implications

The proposed development demonstrates inexcusable disregard for our current Climate Crisis. The 27 proposed new hangars, and the eleven Atlantic Aviation hangars, promote private luxury and business jet use. With typically 4-5 passengers per flight³, private jets are considered to be the most egregious form of travel per capita for their carbon footprint.

To put the magnitude of the proposal in context:

- A typical passenger car generates about 4.6 metric tons of CO2 per year⁴
- Public transportation reduces CO2 emissions by 45%, compared with driving alone in a car.⁵
- **Private jets generate 7,500 tons of CO2 per person/user per year.**⁶
- In 2022, there were 36,808 jet operations at Hanscom. (*State of Hanscom 2022 Report*)

¹ Brad Plumer, "A dire warning from the UN on climate," *Boston Globe*, 3/21/23

² Beverly Law and William Moomaw, "Curb Climate Change the Easy Way: Don't Cut Down Big Trees," 4/6/21, <https://now.tufts.edu/2021/04/06/curb-climate-change-easy-way-dont-cut-down-big-trees>

³ Erick Burgueno Salas, "Number of passengers per private jet flights 2016-2019," *Statista*, April 13, 2022, at <https://www.statista.com/statistics/1171518/private-jet-per-flight/>.

⁴ EPA, "Greenhouse Gas Emissions from a Typical Passenger Vehicle," <https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle>

⁵ Andy Pei, UCLA Transportation, "5 Environmental Benefits of Sustainable Transportation," 10/7/21, <https://transportation.ucla.edu/blog/5-environmental-benefits-sustainable-transportation>

⁶ Gossling and Humpe, "The global scale, distribution and growth of aviation: Implications for climate change," *Global Environmental Change* (2020) at 9. See <https://www.sciencedirect.com/science/article/pii/S0959378020307779>.

Environmental Justice implications

Hanscom Field civil airport is located in the four towns of Bedford, Concord, Lexington and Lincoln. The proposed project would be sited entirely in Bedford. In the 2/24/23, DEIR Scope, EEA Secretary Rebecca Tepper referenced 35 Environmental Justice populations within a five-mile radius of the project site located in Billerica, Burlington, Lexington, and Waltham, with specific directives to the developers for comprehensive outreach.

(Attachment 1: Key Documents, #11- DEIR Scope, EEA #16654)

Additional implications

Secretary Tepper reported receiving over 350 Public Comments from legislators, government agencies and boards, organizations and citizens who voiced their concerns and opposition to the proposed expansion in response to the developers' ENF, which was submitted to MEPA on 1/17/23.

(Attachment 2: List of Government & Organization Public Comments)

In addition to concerns about climate risk and risk to EJ communities, Commenters also voiced concerns about a number of other significant issues associated with the proposal, including:

- increased noise, air, water and soil pollution on public health and natural surroundings
- PFAS superfund sites on the Navy hangar parcel and drinking water contamination
- adverse impacts on national resources: Minute Man Park, Walden Pond and Woods, and Great Meadows Wildlife Refuge
- adverse impacts on wildlife, mature trees, and water ways
- land alteration impacts on biodiversity and on natural carbon sequestration

Secretary Tepper's 20-page DEIR Scope includes numerous directives to the developers for in-depth, detailed studies on a wide array of these and other issues. Among them, Tepper calls on the developers to provide data specific to GHG emissions from aircraft, a central factor to the proposed development – and completely absent in the developers' ENF.

Developers' rationale for private jet hangar expansion: It's environmentally beneficial.

Defying common sense and logic, the ENF's primary rationale for the proposed expansion of private jet hangar space is that it would be environmentally beneficial, for two reasons:

1) Reduced ferry flights: According to the developers, flights that fly in and out of Hanscom empty, because there aren't enough hangars for overnight jet storage, would be reduced by the proposed expansion because hangars would provide sufficient overnight storage. This assertion is offered with no supportive evidence. Moreover, the "reduced ferry flight" rationale rings hollow to veteran Hanscom observers who have heard it applied before to previous development proposals, only to watch operations increase with each expansion. A Comment by Dan Schragger, a long-time Hanscom user, provides an insider's critique of the ferry flight argument. *(Attachment 3)*. The DEIR Scope raises the point that instead of constructing hangars, perhaps the ferry flight problem could be solved operationally through ride-sharing and/or shuttle bus service.

2) Green infrastructure: The developers would have us believe that because they might construct LEED Gold certified buildings, install solar panels on hangar roofs, provide charging stations for electric cars (on parking lots that are currently woodlands and open space), and plan for storm runoffs, their proposal is environmentally-friendly because it would support Massport's commitment to achieve net-zero by 2031. It should be noted that Massport net-zero goals

are solely focused on emissions from ground facilities, and do not take into account aircraft emissions. (*Source: Massport website*)

While these energy-saving and carbon-reducing features for infrastructure are commendable under normal circumstances, their gains would pale in the shadow of the intense GHG output from the private jets they are intended to support.

The Moving Parts: The Properties, the Players, the Land Swap, the Lease

The proposed development would be sited in Bedford MA on two adjacent properties (Massport land and privately owned land), and hence, involves two property owners. There are overlapping connections between Massport's developer, the company that owns the private property, and with Silicon Valley Bank. The proposed project also involves a land swap between Massport and the private property owner, as well as a lease. For specifics, please refer to *Attachment 4: The Moving Parts*.

CONCLUDING REMARKS

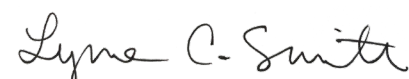
This immense expansion project has the potential to single-handedly undercut the total combined GHG reductions that Massachusetts and our towns are working diligently to achieve. For this reason alone, it should not be allowed to go forward at Hanscom--or at any other airport.

On 3/20/23, ICCP climate scientists reported that *"Earth is likely to cross a critical threshold for global warming within the next decade, and nations will need to make an immediate and drastic shift away from fossil fuels to prevent the planet from overheating dangerously."*⁷ The conventional argument that private jets are necessary for CEOs to do business and to boost the economy no longer holds. In light of the ICCP report, the adverse impacts of the proposed private jet hangar expansion cannot be justified.

REQUEST: We, therefore, ask you, in your capacity as the first Climate Chief of Massachusetts, and in the nation, to apply the full measure of your authority and influence to put a stop to this proposed development and send a message to Massport, and to all airport owners, that as our Climate Crisis intensifies, we cannot tolerate or allow the unbridled expansion of super-emitting private jet use at any airport, including Hanscom.

We also request a meeting with you to further discuss this issue.
Thank you for your time and attention,

Kati Winchell 
Save Our Heritage, 91 Main St., Suite 201, Concord MA 01742

Lynne Smith 
Lincoln Climate Action Plan Committee, 5 Tabor Hill Rd., Lincoln MA 01773

⁷ Brad Plumer, "A dire warning from the UN on climate," *Boston Globe*, 3/21/23

Attachments:

1. Key Documents & Meetings, with links
2. List of Government & Organizational Public Comments
3. Public Comment by Dan Schrager, long-time Hanscom user
4. The Moving Parts: The Properties, Owners, Land Swap & Lease
5. Report on 2/22/23 Meeting between Massport and Hanscom-area Town Managers, obtained by Public Record Request – *referenced in Attachment 4, The Moving Parts*

Facts about Hanscom Field:

- Though they share the same name and history and abut each other, Hanscom Field and Hanscom Air Force Base (HAFB) are separate and distinct. Hanscom Field is a General Aviation (GA) airport owned by Massport. Hanscom Air Force Base has no aviation activity or runway. AF active flying ended in September, 1973. Occasional military flights use Massport's runway at the civil airport.
- Hanscom is the largest general aviation (GA) airport in New England, and a reliever for Logan Airport.
- Hanscom was the 20th busiest private jet airport in the nation in 2021.
- Massport owns Logan and Worcester Airports, in addition to Hanscom Field,
- There are no taxes on private business and luxury jets.
- Massport pays no property taxes for Hanscom to its four host towns: Bedford, Concord, Lexington and Lincoln

Save Our Heritage 91 Main Street, Concord MA 01742 contact: kati@saveourheritage.com

Save Our Heritage is a 501c3 nonprofit organization which has worked for decades on behalf of the four Hanscom-area towns (Concord, Bedford, Lexington and Lincoln) to protect the many irreplaceable historic and environmental resources in these communities from the adverse impacts of expansion at Hanscom Field civil airport.