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February 24, 2023

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

PROJECT NAME : L.G. Hanscom Field North Airfield Development  
PROJECT MUNICIPALITY : Bedford  
PROJECT WATERSHED : Shawsheen River  
EEA NUMBER : 16654  
PROJECT PROPONENTS : Runway Realty Ventures, LLC and North Airfield Ventures, LLC  
DATE NOTICED IN MONITOR : January 25, 2023

Pursuant to the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62L) and Section 11.06 of the MEPA Regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of a mandatory Draft Environmental Impact Report (DEIR).

I received over 350 comment letters from legislators, local officials, residents and community group expressing significant concerns about the project. Most commenters identify concerns that the project will increase the capacity of the Massachusetts Port Authority's (Massport's) L.G. Hanscom Field (Hanscom) to accommodate more flights. Commenters therefore indicate that, in contrast to the climate goals established by the Commonwealth and local communities, the project will lead to increased greenhouse gas (GHG) emissions rather than reduced emissions through the use of carbon-free or low carbon aviation technology, such as electric airplanes and Sustainable Aviation Fuel (SAF), or a reduction in the number of flights. Many commenters emphasized the potential environmental and public health impacts of increased Hanscom operations, which would affect residents, including residents within Environmental Justice (EJ) populations, historical and cultural resources, water supplies, wildlife habitat and recreational activities.

I note that many comments request that the project not be approved. MEPA is not a permitting process and I do not have the authority to approve or deny a project. The purpose of MEPA is to provide

meaningful opportunities for public review of the potential environmental impacts of projects for which Agency Action is required, and to assist each Agency in using (in addition to applying any other applicable statutory and regulatory standards and requirements) all feasible means to avoid Damage to the Environment or, to the extent Damage to the Environment cannot be avoided, to minimize and mitigate Damage to the Environment to the maximum extent practicable. MEPA requires project proponents to fully describe proposed activities, disclose their environmental and public health impacts, review alternatives and identify mitigation measures for unavoidable impacts.

Based on a review of the Environmental Notification Form (ENF), consultation with Agencies, and a review of comment letters, I have determined that the Proponent should prepare the DEIR in accordance with the Scope below.<sup>1</sup> The Scope incorporates many of the concerns identified in comment letters. The DEIR should provide a detailed project description and data and analyses that support the Proponent's assertion that the project will reduce the number of flights at Hanscom. The Scope requires additional analysis of the project's impacts with respect to air emissions, noise, land alteration, wildlife habitat, water quality and transportation, and requires an evaluation of climate risks affecting the project site. The DEIR should include copies of all comment letters submitted and detailed responses to comments.

### Project Description

As described in the Environmental Notification Form (ENF), the project consists of the development of 495,470 square feet (sf) of aircraft hangar space, including construction of 27 aircraft hangars with a combined area of 408,360 sf and renovation of an existing 87,110-sf hangar building ("Navy Hangar"). The hangars will be designed with doors measuring 28 feet wide and at least 105 feet high. Each hangar will also include interior space for aviation support, passenger amenities and aircraft maintenance and repair. Vehicular access to the site will be provided at two existing entrances off Hartwell Road; the third existing curb cut will be eliminated. A perimeter vehicular roadway will be constructed around the east, north, west and southwest portions of the site to provide access to the hangars and to a total of 240 parking spaces in several lots across the site. A new connection between the site and Hanscom's Taxiway R will be constructed by the Proponent to provide access for aircraft between the site and the airport. As detailed below, the Proponent will lease a portion of the site and acquire two parcels from Massport to assemble the project site.

According to the ENF, providing aircraft parking and on-airport storage at Hanscom is consistent with Massport's long-term planning goal of relieving pressure from Logan Airport by using regional airports to satisfy the current and future demand for general aviation services. The project is asserted to meet demand for individual hangar space by existing users desiring permanent hangar space and Hanscom's three fixed base operators (FBOs) who are currently operating over capacity and have waiting lists for new customers seeking hangar space. Currently, aircraft operators who do not have hangar space at Hanscom must fly to Hanscom from their base of operations, pick up and drop off passengers, then fly back empty to the base location to park/store the aircraft until the next customer requires service; these extra flights between Hanscom and an off-site base location are known as "ferry flights." According to the ENF, the project will provide an environmental benefit by reducing the number of flights to and from Hanscom by providing on-site hangar space for aircraft that would

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<sup>1</sup> The ENF referred to the two Proponents of the project (Runway Realty Ventures, LLC and North Airfield Ventures, LLC) as the "Proponent." This Certificate likewise uses the term Proponent to refer collectively to both project entities.

otherwise require the use of ferry flights to pick up and drop off passengers.

### Environmental Status and Planning Report (ESPR)

The MEPA regulations (Section 11.06(2)) indicate that during the course of an ENF review I may review any relevant information from any other source to determine whether to require an EIR, and, if so, what to require in the Scope. To provide context for this project-specific review and because many issues raised by commenters relate to airport-wide operations and impacts, this Certificate refers to information included in Environmental Status and Planning Reports (ESPR) (EEA# 5484/8696) prepared by Massport for by MEPA and the public.

The MEPA environmental review process for Hanscom occurs on two levels: airport-wide and project-specific. Approximately every five years since 2000, Massport has prepared an ESPR, which provides a “big picture” analysis of the environmental impacts of current and anticipated levels of airport-wide activities (including aircraft operations and passenger activity), and presents comprehensive strategies to avoid, minimize and mitigate impacts. The ESPRs have provided analyses of environmental impacts associated with Hanscom Field activities and considered future conditions based on projected operations. The ESPRs have included important data on airport facility planning and environmental impacts, including key indicators of airport activity levels, the regional transportation system, ground access, noise, air quality, environmental management, and project mitigation tracking. As a result, the documents have served as planning tools to guide Massport in the development of policy and programs. Potential development of the North Airfield was previously identified as part of the long-range planning analysis included in each ESPR. Prior to preparing an ESPR, Massport submits a Proposed Scope for the ESPR for review by the MEPA Office, Agencies and the public. A Certificate is then issued formalizing the Scope for the next ESPR. Most recently, Massport submitted a Proposed Scope for the 2022 ESPR in October 22, 2022 and a Certificate on the Proposed Scope was issued on December 16, 2022. Massport anticipates that the 2022 ESPR will be completed this year and distributed for public review and comment.

### Project Site

The 49.4-acre project site abuts the north side of Hanscom Field, a regional airport operated by Massport in Bedford, Concord, Lexington and Lincoln. The project site is located entirely within Bedford and consists of approximately 33.3 acres of land owned by the Massport and 16.1 acres owned by the Proponent. Massport owns approximately 29.5 acres on the western part of the site and a 3.8-acre area at the eastern end of the site. The Proponent owns the remaining 16.1-acre area (the Navy Hangar site), which was purchased from the U.S. General Services Administration (GSA) in 2019. Massport will lease the 28.1-acre area at the western part of the site (“lease area”) to the Proponent and convey to the Proponent a 1.4-acre parcel at the eastern end of the lease area and a 3.8-acre parcel adjacent to the eastern end of the Proponent’s property. The Proponent will convey a 2.6-acre area adjacent to Taxiway R to Massport. Upon completion of the land transfers, the Proponent will own 21.3 acres of land and lease 28.1 acres from Massport.

Massport-owned land at Hanscom is located west, south and east of the site. The project site is bordered by Hartwell Road and commercial land uses to the north. A residential neighborhood on Hartwell Road is located approximately 1,000 feet northeast of the site. The site is flat near the airfield

and slopes up to Hartwell Road. The western part of the site owned by Massport was formerly used as a trailer park which was used to provide supplemental housing for the Hanscom Air Force base and is now largely undeveloped and wooded. The central portion of the site includes the Navy Hangar building and is largely paved. The eastern part of the site is vegetated and undeveloped.

Most of the project site is located within the Zone II wellhead protection area associated with the Town of Bedford's drinking water supply wells. The site is located adjacent to mapped Priority Habitat at Hanscom; as stated in the Scope, the DEIR should confirm whether Priority Habitat extends onto the project site and whether any activities are proposed within rare species habitat. According to the Federal Emergency Management Agency's (FEMA's) National Flood Hazard Layer, the site is not within the 100- or 500-year floodplain. According to data available from MassGIS, the site does not contain wetlands, vernal pools, or prime forestland and is not within any surface water protection areas. According to the Massachusetts Historical Commission (MHC), the site is in an area considered to be archaeologically sensitive due to the proximity of known historic period and ancient Native American archaeological sites; in addition, it is in proximity to the Minute Man National Historical Park, which is a National Historic Landmark and listed in the National Register of Historic Places

The project site is within an Environmental Justice (EJ) population (census blocks)<sup>2</sup> designated as Minority. There are no additional EJ populations within the one-mile Designated Geographic Area (DGA) around the site. The project site is within five miles of 35 additional EJ populations designated as Minority located in Billerica, Burlington, Lexington and Waltham.

### Environmental Impacts and Mitigation

Potential environmental impacts of the project include alteration of 23.2 acres of land; the addition of 23.9 acres of impervious area; generation of 194 average daily (non-aircraft) vehicular trips (adt); use of 135200 gallons per day (gpd) of water; and generation of 12,150 gpd of wastewater. Greenhouse Gas (GHG) emissions and other air pollutants are associated with on-site energy use and transportation, as well as aircraft activity. Construction and operation of the project will generate noise and air emissions, including Greenhouse Gas (GHG) emissions associated with on-site energy use and transportation.

According to the ENF, the project will reduce the overall number of aircraft flights and result in an environmental benefit associated with reduced air emissions; as detailed below, the DEIR should provide documentation in support of this benefit. Measures to avoid, minimize, and mitigate environmental impacts include construction of energy-efficient buildings with enhanced electrical infrastructure to support electric vehicles and future aircraft electrification initiatives and construction of a stormwater management system consistent with the Massachusetts Stormwater Management Standards (SMS). The DEIR should contain a comprehensive discussion of measures to be taken by the project to avoid, minimize and mitigate environmental impacts.

### Jurisdiction and Permitting

The project is undergoing MEPA review and is subject to preparation of a mandatory EIR

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<sup>2</sup> "Environmental Justice Population" is defined in M.G.L. c. 30, § 62 under four categories: Minority, Income, English Isolation, and a combined category of Minority and Income.

pursuant to Section 11.03(1)(a)(2) of the MEPA regulations because it requires an Agency Action and will create ten or more acres of impervious area. The project is also required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a DGA (1 miles) around one or more EJ Populations. The project exceeds ENF thresholds at 301 CMR 11.03(1)(b)(1) (direct alteration of 25 or more acres of land) and 301 CMR 11.03(1)(b)(2) (creation of five or more acres of impervious area). The project is subject to the MEPA GHG Emissions Policy and Protocol.

The project requires an Order of Conditions (OOC) from the Bedford Conservation pursuant to the Town's Wetlands Bylaw and approvals from other Town of Bedford agencies.<sup>3</sup> It requires approval by the Federal Aviation Administration (FAA) and a National Pollutant Discharge Elimination System Construction General Permit (NPDES CGP) from the Environmental Protection Agency (EPA).

The project involves Land Transfers, in the form of a lease and land disposition, from Massport to the Proponent. The Land Transfers involve a majority of the project site, and will facilitate development of a common and integrated development plan across the entire site. Therefore, MEPA jurisdiction is broad and extends to those aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

### Review of the ENF

The ENF included a brief description of existing and proposed conditions, preliminary project plans, and an alternatives analysis, and identified measures to avoid, minimize and mitigate environmental impacts. Consistent with the MEPA Interim Protocol on Climate Change Adaptation and Resiliency, the ENF contained an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool"),<sup>4</sup> together with information on climate resilience strategies to be undertaken by the project. The DEIR should provide a detailed description of the project's operations and anticipated reduction in the number of ferry flights, and a thorough analysis of the project's impacts and mitigation measures, as set forth in the Scope below.

## SCOPE

### General

The DEIR 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 demonstrate that the Proponent will pursue all feasible measures to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible.

### Project Description and Permitting

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<sup>3</sup> Local approvals are required for the project activities on the Navy Hangar parcel only because Massport is exempt from local regulation.

<sup>4</sup> [https://resilientma.org/rmat\\_home/designstandards/](https://resilientma.org/rmat_home/designstandards/)

Conceptual plans should be provided at a legible scale and clearly identify open space, buildings, roadways, impervious areas, stormwater and utility infrastructure and easements. The DEIR should identify and describe state, federal and local permitting and review requirements, 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; in particular, the DEIR should review FAA permitting requirements and the status of the project's review under the National Environmental Policy Act (NEPA).

The DEIR should include updated site plans for existing and post-development conditions at a legible scale and a detailed description of all project components, including buildings, accessory structures such as fueling tanks, impervious areas, stormwater and utility infrastructure and transportation improvements. The DEIR should provide detailed plans, sections, and elevations to accurately depict existing and proposed conditions, including rare species habitat, wetlands and floodplains (including wetlands subject to regulation under the Town's Wetlands Bylaw), easements and site topography. It should provide updated calculations of the impacts of the project in a tabular format. The DEIR should identify, describe, and assess the environmental impacts of any changes in the project that have occurred between the preparation of the ENF and DEIR.

The information and analyses identified in this Scope should be addressed within the main body of the DEIR and not in appendices. In general, appendices should be used only to provide raw data, such as drainage calculations, traffic counts, capacity analyses and energy modelling, and such data and analyses should be summarized with text, tables and figures within the main body of the DEIR. 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. Any references in the DEIR to materials provided in an appendix should include specific page numbers to facilitate review.

#### Activity Levels and Ferry Flights

The DEIR should provide an expanded project description that more clearly describes all project components. It should clearly state whether the project will facilitate and accommodate an anticipated increase in flight activity at Hanscom, or whether it is intended to absorb existing demand. If the former, the DEIR should describe the extent to which the project will expand capacity of the airport to accommodate future growth, including through the number and design of hangar spaces, or, alternatively, whether the demand is anticipated to grow independent of the project. To the extent this project will lead to a net increase in flight activity, this should be accounted for by Massport in future ESPRs. The DEIR should review the detailed information on current and future activity levels at Hanscom included in the ESPR and discuss how the project may affect future activity levels.

A key rationale for the Preferred Alternative is that it will provide an environmental benefit by reducing the overall number of flights and associated air emissions; the ENF asserted that this would result because the project provides hangar spaces for planes that would otherwise generate ferry flights. Many commenters questioned whether the project will reduce impacts associated with existing flights or whether it will result in more flights and increased air emissions and noise levels. The DEIR should describe in greater detail how the project will meet the objective of meeting the demand for hangar spaces while also reducing impacts. Specifically, the DEIR should describe the number and type of aircraft to be stored in the hangers and provide a comprehensive explanation of ferry flights, estimate the

number of ferry flights that are anticipated under existing and future conditions with explanation of how the estimates were generated, explain how the project concludes that ferry flights would necessarily occur in the absence of hangar spaces (e.g., as opposed to aircrafts departing to serve additional customers instead of seeking parking spaces at another base location), and discuss why expanding hangar capacity to meet potential future increases in customer demand would not result in a net increase in flights as compared to existing conditions, even when accounting for a reduction in ferry flights.

Due to the uniqueness of this analysis, the Proponent should consult with Massport regarding the appropriate data and methodology that should be used to estimate the number of flights (including ferry flights) and activity levels, under existing and proposed conditions. The DEIR should fully document and explain not only the conclusions of the analysis, but also the data, assumptions and methodologies used. The Proponent should review comment letters which recommend specific data that should be provided to support the project's environmental benefits. To the extent any recommended data sources or analysis identified below and in comment letters are not addressed in the DEIR, the DEIR should provide an explanation of why the information was not incorporated, including if data are not available and/or cannot be reasonably collected, are not pertinent to the analysis, or would not yield informative results. The analysis should address the items listed below, in addition to factors recommended by commenters and by Massport:

- The number and frequency of ferry flights under existing and proposed conditions
- The proportion of overall flights documented in the 2017 ESPR (or 2022 ESPR, if available) that are composed of ferry flights, and trends in the number of ferry flights over time
- Characterization of ferry flights, including types of aircraft, distances flown to pick up and drop off passengers, operation of the aircraft (privately owned, fractionally owned, charter, FBO, and other relevant categories)
- Demonstration that the proposed hangars are designed to accommodate the number and type of aircraft responsible for ferry flights
- GHG emissions associated with ferry flights and anticipated reduction in emissions resulting from the project
- Discussion of why the existing hangar space at Hanscom, including space recently constructed or currently under construction, and any planned or proposed increase in hangar space, does not or will not reduce ferry flights
- Estimate of additional flights that would be accommodated by the project that are not ferry flights
- Review projections of future aircraft activity in the ESPR and compare projected increase/decreases in air emissions and noise associated with the project to those estimated in the ESPR

### Alternatives Analysis

The ENF included an alternatives analysis which evaluated No Build and Build Alternatives and compared the impacts of these alternatives to those of the Preferred Alternative. The No Build Alternative represents existing conditions and provides a baseline from which the build alternatives can be evaluated. According to the ENF, the Navy Hangar is not usable in its current condition; however, existing paved areas could be used for surface vehicle parking and storage. Because the Preferred Alternative is asserted to have an environmental benefit associated with its reduction in ferry flights, the

DEIR should provide a supplemental description of the No Build Alternative based on current and projected operations at Hanscom using data available in the 2017 ESPR, or, if available, the 20232 ESPR.

The ENF described an alternative development plan for the site involving a mix of hangar space and commercial uses; this alternative was designated as the “Build Alternative” in the ENF but is referred to in this Certificate as the Mixed-Use Alternative. The Mixed-Use Alternative would include the development of up to 165,000 sf of hangar space, including office and support space, on the western Massport-owned part of the site and construction of a 78,700-sf building with laboratory space and renovation of the Navy Hangar building for use as a warehouse on the Navy Hangar site. The hangar development included in the Mixed-Use Alternative was described in the 2017 ESPR and proposed by Massport in an Environmental Assessment (EA) evaluated pursuant to the National Environmental Policy Act (NEPA) in 2018. Additional paved areas would be constructed to provide vehicular parking for a total of 580 vehicles, aircraft apron space and a connection to Taxiway R. The Build Alternative would add 5.4 acres of impervious area, generate 1,916 adt, use 16,300 gpd of water and generate 14,800 gpd of wastewater. Compared to the Preferred Alternative, the Build Alternative would add 18.5 fewer acres of impervious area, generate 1,722 more adt, add 340 more parking spaces, use 2,800 gpd more water and generate 2,650 gpd more wastewater. According to the ENF, the Build Alternative was deemed to be economically infeasible because the low density of hangar space would not support the cost of providing the necessary infrastructure. In addition, the Build Alternative does not meet the project purpose, which is to meet the anticipated future demand for additional hangar space consistent with Massport’s objective of reducing demand at Logan Airport. For this reason, the Mixed-Use Alternative was dismissed in favor of the Preferred Alternative.

According to the ENF, the Preferred Alternative will provide sufficient hangar space to meet demand and reduce the number of ferry flights. The hangars will be constructed to be energy efficient, will include rooftop solar photovoltaic (PV) generating systems and will be designed to orient the activities at the site in a manner to minimize visual and noise impacts. As indicated in the Scope, the DEIR should include a more detailed description of the project and its anticipated environmental benefits and impacts.

The DEIR should provide an expanded alternatives analysis. The DEIR should provide a supplemental description of the No Build Alternative using the data on environmental trends available in the 2017 ESPR (or 2022 ESPR, if available) to reflect conditions without the construction and operation of the Preferred Alternative, including the reduction in Hanscom flights which the Proponent asserts will result from the project.

The DEIR should review a reduced build alternative that achieves the goals of reducing the number of ferry flights by constructing fewer hangars and thereby minimizing land alteration. It should review alternatives consisting of operational measures that could be implemented to reduce ferry flights without additional hangars; potential operational measures that should be reviewed include disincentives or penalties for operators conducting ferry flights; restrictions on the number or types of aircraft used for ferry flights; use of ground transport, such as shuttle buses, to transport passengers between Hanscom and the location where the aircraft are stored; or incentives for ferry flights that pick up multiple passengers or use SAF. The DEIR should evaluate measures analogous to transportation demand management (TDM) programs used to minimize single-occupancy vehicle trips, such as ride sharing and



ride matching services. The DEIR should estimate the associated reduction in emissions from the reduced build and operational alternatives, as compared to the Preferred Alternative.

The DEIR should review an alternative involving phased construction of the proposed hangars, with the later phases of construction being contingent upon the widespread availability of SAF or electric planes. It should also review the feasibility of constructing later phases of the project upon a clear demonstration that the project achieves its goal of reducing ferry flights.

Comment letters suggest that the use of hangar spaces by private jets will serve to increase emissions, and suggest that the Proponents and Massport could mandate that any and all hangars within the development house only fossil fuel-free aircraft. The DEIR should discuss the feasibility of this alternative, and describe any other alternatives that could maximize the use of sustainable aviation fuels by future users of the hangars. The DEIR should discuss how the Preferred Alternative is consistent with Massport's "Net Zero" planning and the Commonwealth's emissions reduction goals.

### Environmental Justice

As noted above, the project site is located within an EJ population designated as Minority. According to the Proponent, the only identified EJ population within the DGA is located entirely within the Hanscom Air Force Base; however, according to the ENF, there are no housing units on the Air Force Base within the census block group containing the EJ population. Within the census tract containing the above EJ population, no languages are identified as those spoken by 5% or more of residents who also identify as not speaking English very well. As noted, the project site is within five miles of 35 additional EJ populations designated as Minority located in Billerica, Burlington, Lexington and Waltham.

Effective January 1, 2022, all new projects in DGAs as defined in 301 CMR 11.02, as amended around EJ populations are subject to new requirements imposed by Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy* ("Climate Roadmap Act") and amended MEPA regulations at 301 CMR 11.00. Two related MEPA protocols – the MEPA Public Involvement Protocol for Environmental Justice Populations ("MEPA EJ Public Involvement Protocol") and MEPA Interim Protocol for Analysis of Project Impacts on Environmental Justice Populations ("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*

Consistent with the MEPA Public Involvement Protocol for Environmental Justice Populations ("MEPA EJ Public Involvement Protocol"), the Proponent sent advance notification of the project in the form of an EJ Screening Form to a "EJ Reference List" provided by the MEPA Office and consisting of Community Based Organizations (CBOs) and tribes/indigenous organizations. According to the Proponent, direct outreach to any residents within the EJ population would be difficult because the Air Force Base is not accessible for security reasons. The notice of the MEPA in-person site visit and remote consultation session was distributed to the EJ Reference List. The site visit was held at 3:00 PM on

February 6, 2023 and was attended by approximately 50 people. The remote consultation session was held at 6:30 PM on February 6, 2023 and was attended by approximately 150 people. A recording of the remote consultation session was posted by the Proponent at <https://vimeo.com/800998336>, and is anticipated to be available through the Town of Bedford website. Prior to filing the ENF, the Proponent made a project presentation at a meeting of the Hanscom Field Advisory Commission (HFAC) on June 22, 2021 and provided updates at subsequent monthly meetings of the HFAC. In addition, the Proponent held an informational meeting with representatives of the Town of Bedford on December 12, 2022.

The ENF described a public engagement plan that the Proponents intend to follow for the remainder of the MEPA review process. The plan was limited to distributing electronic copies of the ENF to the EJ Reference List, making a copy of the ENF available at the Bedford Public Library and disseminating notice of the MEPA site visit and consultation session (which was already conducted). According to the ENF, the Proponent will continue to participate in public meetings and engage with the Town of Bedford and, to the extent practicable, with residents in the EJ population as the project advances through the MEPA process.

The DEIR should include a separate section on “Environmental Justice,” and contain a supplemental description of measures the Proponent intends to undertake to promote public involvement by EJ populations during the remainder of the MEPA review process, including a discussion of any of the best practices listed in the MEPA EJ Public Involvement Protocol that the project intends to employ. While outreach to the single mapped EJ population within the DGA appears difficult, I note that the project is surrounded by multiple EJ populations within five miles of the site. Given the dispersed nature of air emissions associated with aircraft activity, the Proponents are advised to conduct broader outreach to areas within the five-mile radius that may be particularly impacted by aircraft routes or flight patterns. To the extent commenters or other members of the public who have expressed interest in the project have indicated an association with EJ neighborhoods, the Proponents should broaden outreach efforts to those particular neighborhoods. The DEIR, or a summary thereof with translations, should be distributed to the EJ Reference List that was used to provide notice of the ENF, and the Proponent should obtain a revised EJ Reference List from the MEPA Office to ensure that contact information is updated. The DEIR should report on the outcome of any targeted outreach conducted to EJ neighborhoods, including any changes to project design that may be made in response to community concerns.

I encourage the Proponent to request an extended comment period for the DEIR to facilitate its review by the public and by local, state and federal agencies and to hold at least one public informational meeting prior to filing the DEIR. Because of its importance in demonstrating the project’s environmental benefits, I recommend that the Proponent present the methodology and preliminary findings of the analysis of ferry flights described above at a public meeting and revise or supplement the analysis, if necessary, in response to community input prior to filing the DEIR.

#### *Baseline Health Assessment*

The ENF included a baseline assessment of any existing “unfair or inequitable Environmental Burden and related public health consequences” impacting the EJ Population in accordance with 301 CMR 11.07(6)(n)(1) and 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. According to the ENF, the data surveyed indicate that neither the census tract containing the single identified EJ population nor the Town of Bedford exceed any of the four vulnerable health EJ criteria, which include Childhood Lead Exposure, Childhood Asthma Emergency Department Visits, Low Birth Weight and Heart Attack Hospitalizations. Areas of Lexington and Concord are also located within the one-mile radius of the site; however, as noted, the only mapped EJ population within the DGA is located within the Hanscom Air Force in Bedford and not in any of the surrounding towns; neither Lexington nor Concord meet any vulnerable health EJ criteria.

The ENF 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: 1
- M.G.L. c. 21E sites: 5
- “Tier II” toxics use reporting facilities: 8
- Sites with Activity and Use Limitations (AULs): 3
- Underground storage tanks (USTs): 8
- EPA facilities: 2
- MBTA bus and rapid transit: 6 bus stops
- Other transportation infrastructure: 1 (Hanscom)

Although not required by the MEPA Interim Protocol for Analysis of EJ Impacts, the ENF surveyed environmental indicators tracked through the U.S. EPA’s “EJ Screen,” which compares the indicators by U.S. census block to MA statewide averages. The EJ Screen Tool reports on the following indicators:

- The National Air Toxics Assessment (NATA) indicators related to air toxics, including lifetime cancer risk from exposure to air toxics, hazard index for respiratory effects and diesel particulate matter concentration;
- Emissions of particulate matter (PM2.5) from power plants, industrial facilities and other sources;
- Ozone concentration in air, which is a primary constituent of smog;
- Percentage of occupied housing units built before 1960, which are likely to contain lead-based paint hazards that may contribute to elevated blood lead levels in children;
- Proximity to high volumes of traffic and associated increased exposure to ambient noise, toxic gases and particulate matter;
- Wastewater discharges to streams that increase potential exposure to pollutants;
- Proximity to National Priorities List (NPL) hazardous waste sites;
- Proximity to hazardous waste treatment, storage or disposal facilities (TSDFs); and,
- Proximity to facilities required to prepare Risk Management Plans (RMPs) because the use toxic, flammable or explosive substances.

According to the EJ Screen results, Proximity to NPL sites is the only indicator which exceeds the 80<sup>th</sup> percentile within the DGA.

According to the output report from the MA Resilience Design Tool included in the ENF, the project site has a high exposure to urban flooding due to extreme precipitation and to extreme heat. EJ populations within the DGA are likely also exposed to these climate risks. The DEIR should discuss climate resiliency measures to be employed by the project, consistent with the Climate Change scope below.

While the above indicators do not appear to show substantially elevated public health risks in the immediate vicinity of the site, as noted, the dispersed nature of air emissions could have effects over a broader radius around the project site. Several commenters have questioned the assertion in the ENF that an expansion in hangar capacity at the site could have the effect of reducing emissions and other impacts. As described in the Air Quality scope below, the DEIR should provide a comprehensive assessment of the air emissions impacts of the project, including from any increased activity levels and reductions in ferry flights resulting from the project. The data and methodologies used to calculate emissions should be fully explained. The DEIR should discuss whether current and future flight patterns associated with the hangar expansion are anticipated to disproportionately affect any particular neighborhoods, including EJ populations, within a five-mile radius around the site.

### Public Health

The DEIR should include a separate section on “Public Health,” and discuss any known or reasonably foreseeable public health consequences that may result from the environmental impacts of the project. Publicly available data, including through the DPH EJ Tool, should be surveyed to assess the public health conditions in the immediate vicinity of the project site, in accordance with 301 CMR 11.07(6)(g)10. Any project impacts that could materially exacerbate such conditions should be analyzed. To the extent any required Permits for the project contain performance standards intended to protect public health, the DEIR should contain specific discussion of such standards and how the project intends to meet or exceed them.

### Land Alteration

The DEIR should include a detailed plan showing pre- and post-construction site grades and provide a cut and fill plan and table. The cut and fill plan should be provided with and without the project layout (including buildings, aprons, roadways and parking areas) superimposed on the plan. The DEIR should provide an updated estimate of the proposed area of land alteration. It should cumulatively and separately quantify the total amount of alteration and fill associated with each hangar building, aprons, roadways and vehicular parking lots.

The DEIR should characterize the land cover in the western part of the site. The forested portion of the site should be described with respect to species composition, and approximate age, size and density. The DEIR should include site plans that clearly locate and delineate areas proposed for development and areas to be left undisturbed. It should describe how the project will be designed to avoid and minimize land alteration when fully built and during each stage of the construction period.

### Stormwater Management

The project will add 36.75 acres of impervious area. According to the ENF, the stormwater management system will be constructed to comply with the SMS, including requirements for maintaining pre-construction peak runoff rates and volumes and removing at least 80 percent of Total Suspended Solids (TSS) from stormwater. The stormwater management system will include Best Management Practices (BMPs) such as above- and below-ground detention/infiltration systems, bioretention areas, structural systems and pervious pavement, where feasible.

The DEIR should describe the proposed stormwater management system and provide an analysis to demonstrate how it will be designed to satisfy all standards of the SMS and any additional requirements of the Town's Stormwater Bylaw and Regulation. It should confirm that the stormwater management system will meet additional requirements for stormwater discharges within a Zone II wellhead protection area and, if applicable, for land uses with higher potential pollutant loads. The DEIR should include detailed plans at a readable scale of the proposed drainage system and provide calculations of water quality volume, infiltration volume, total suspended solids removal, and peak rates of runoff for predevelopment and post-development site. Given the significant amount of impervious area to be added to the project site, the DEIR should include an evaluation of measures that exceed the SMS by incorporating low impact design (LID) strategies and green infrastructure wherever practicable. Green infrastructure is an effective way to treat stormwater generated by impervious surfaces and provide cooling and other benefits for the community and should be extensively incorporated into the warehouse building, parking lots, and other paved areas to the maximum extent possible. The DEIR should demonstrate that LID designs have been considered to the maximum extent practicable. The DEIR should provide analysis of the capacity of the stormwater management system under future climate conditions, as described below.

### Traffic and Transportation

According to the ENF, the project will generate 194 adt by vehicles on area roadways. The trip generation estimate is based on trip rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual* using Land Use Code (LUC) 022 (General Aviation Airport). According to the ENF, the estimate of daily vehicle trips is based in part on the assumption that the facility will be staffed by 13 employees. The estimated number of vehicle trips generated by the project is well below the minimum MEPA review threshold for trip generation, which is 1,000 adt (in combination with construction of 150 or more New parking spaces). However, the project includes the construction of a total of 240 parking spaces. While the ENF indicated that the proposed number of parking spaces is needed because vehicles may be parked on the site for more than one day, it would appear that the Proponent anticipates a significant number of non-employee trips to and from the site.

The DEIR should include an analysis in support of the project's trip generation and parking supply as proposed in the ENF. It should describe the staffing levels needed to operate 27 hangars and any fluctuations in the number of staff. The DEIR should identify the type and number of non-employee trips and describe the travel patterns (e.g., peak or non-peak hour trips, weekday or weekend, etc), and provide a rationale for the large parking supply proposed in the ENF. It should describe the anticipated frequency of truck trips to the site during operation of the facility and likely travel routes, and estimate changes in traffic volumes on roadways adjacent to and within the Minute Man National Historical Park,

Great Meadows National Wildlife Refuge and residential neighborhoods. The DEIR should review the feasibility of using only one curb cut to access Hartwell Road, and describe any roadway changes that may be necessary to accommodate project-generated traffic. It should review potential transportation demand management (TDM) measures that will be implemented to minimize vehicular trips to and from the site. Alternatively, the Proponent may provide in the DEIR a full transportation analysis prepared consistent with the *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014 by EEA and the Massachusetts Department of Transportation; according to the Town of Bedford, the Proponent may be required to prepare such an analysis in connection with the Town's permitting process.

The DEIR should describe construction-period traffic, including the anticipated number of construction vehicles and truck routes. According to the ENF, the Proponent is exploring the feasibility of using the airfield to accommodate construction vehicle traffic in order to avoid the use of residential streets. The DEIR should review the feasibility of establishing a construction vehicle route using the airfield in light of security and safety requirements for operation of the airport. It should clarify whether the route would also be used to deliver supplies, such as fuel, to the project site when the facility is in operation. It should describe any additional construction activities that would be required to implement a construction route through the airfield and associated impacts, including land alteration, addition of impervious area, disturbance of rare species habitat or wetlands and identify potential mitigation measures, such as additional stormwater management systems.

#### Rare Species

Most of Hanscom is located within Priority Habitat of rare species mapped by the Natural Heritage and Endangered Species Program. According to the ENF, the project will not disturb any rare species habitat. The DEIR should provide a map of adequate scale to confirm if the project site contains any mapped Priority Habitat. If rare species habitat is located on the project site, the DEIR should review any potential impacts associated with the project and whether any mitigation measures or permitting pursuant to the Massachusetts Endangered Species Act (MESA) is needed.

#### Water and Wastewater

The project will use 13,500 gpd of water and generate 12,150 gpd of wastewater. According to the ENF, the water and sewer services will be provided by connections to the Town of Bedford's water and sewer mains in Hartwell Avenue. The Proponent anticipates that a sewer pump station and force main will be required to convey wastewater from the site to the Town's wastewater system.

The ENF should describe proposed activities requiring the use of water and provide a basis for the proposed volumes of water usage and wastewater generation. To the extent that water will be used to wash aircraft or may come into contact with solvents, fuels or other potential contaminants, the DEIR should describe how wastewater generated by these activities will be captured, contained and/or treated prior to discharge into the Town's sewer system. The DEIR should review any permit requirements that may be imposed by the Massachusetts Water Resources Authority (MWRA) through its Toxic Reduction and Control (TRAC) program or the Town, including Inflow and Infiltration (I/I) mitigation. According to comments provided by the Town of Bedford, analyses of the capacity of the Town's water and sewer infrastructure in the area should be conducted to determine if any system improvements are

needed to accommodate the project. The DEIR should review opportunities for minimizing water use, such as rainwater harvesting or reuse of greywater.

The project site is located within a Zone II wellhead protection area associated with the Town's Shawsheen water supply wells, which are not used due to concentrations of per- and polyfluoroalkyl substances (PFAS). As detailed below, the site is part of a designated Superfund site that continues to be evaluated by the Navy, Air Force, EPA and MassDEP. The DEIR should describe any use limitations applicable to the site based on its location within a Zone II and how the project will be designed to comply with the Drinking Water Regulations (310 CMR 22.00), including requirements for groundwater supply protection. The DEIR should describe any proposed fuel storage tanks at the site, identify their location and describe any containment measures to capture leaks or spills. As discussed below, the design of any spill containment measures should include the capacity to capture releases of fuel that may occur during intense precipitation events under projected climate conditions.

### Noise

The DEIR should include an analysis of noise produced by operation of the facility, including aircraft moving around the site and idling, interior and exterior noise associated with maintenance, repair and starting of aircraft and other noise-producing activities. The analysis should compare existing noise levels at the site and surrounding receptors, including residential uses, to modeled sound levels under proposed conditions. The results of the analysis should be evaluated against standards adopted by MassDEP's Noise Policy, the Town and FAA guidelines. It should review potential noise mitigation measures, such as orientation of buildings, hours of operation, closure of hangar doors, use of ground power units (GPUs) and noise walls. Based on modeled noise levels developed by Massport for the 2017 (or, if available, the 2022 ESPR under development), the DEIR should evaluate potential changes in noise levels associated with reductions in ferry flights.

### Air Quality

The DEIR should provide an air quality analysis consistent with the analyses presented in the ESPR. It should evaluate air emissions from aircraft take-offs, landings, cruising, taxiing and idling. The DEIR should provide estimates of project-generated emissions, or reductions in emissions from Hanscom operations gained through the elimination of ferry flights, for the following pollutants:

- Carbon Monoxide (CO)
- Oxides of Nitrogen (NO<sub>x</sub>)
- Volatile Organic Compounds (VOCs)
- Particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>)
- Carbon dioxide (CO<sub>2</sub>) and other Greenhouse Gasses (GHG)
- Diesel PM
- Lead (Pb)

The DEIR should describe how air emissions were modeled and discuss whether emissions are anticipated to meet the National Ambient Air Quality Standards (NAAQS). It should specifically review emissions from aircraft while they are on the project site and review potential impacts on nearby receptors. The DEIR should describe all mitigation measures implemented to minimize emissions of air

pollutants, including the use of on-site auxiliary power units (APU)/ground support equipment (GSE) and the Proponent's participation in enterprise-level initiatives at Hanscom related to GHG emissions reductions to support the Commonwealth's 2050 "net zero" goals. The DEIR should include a review of the development of technologies to reduce emissions from aircraft, such as electric engines and alternative fuels.

## Climate Change

### *Adaptation and Resiliency*

Based on the MA Resilience Design Tool output report attached to the ENF, the project has a "High" exposure rating based on the project's location for urban flooding associated with extreme precipitation and extreme heat. Based on the 40-year useful life identified for the hangars, the MA Resilience Design Tool recommends a planning horizon of 2070 and a return period associated with a 25-year (four percent chance) storm event when designing for extreme precipitation and the 90<sup>th</sup> heat percentile when planning for extreme heat conditions. Based on the 20-year useful life identified for the aircraft aprons/ramps, the MA Resilience Design Tool recommends a planning horizon of 2050 and a return period associated with a 25-year (four percent chance) storm event when designing for extreme precipitation and the 50<sup>th</sup> heat percentile when planning for extreme heat conditions.

According to the ENF, the design of the project will be evaluated based on the 2070 25-year storm event as recommended by the MA Resilience Design Tool, which estimates a total 24-hour precipitation depth of 8.4 inches for a 2070 25-year storm event. To the extent the site is anticipated to experience urban flooding, the first floor of the buildings will be elevated and/or floodproofed in accordance with Massport's Floodproofing Design Guide. According to the ENF, the stormwater management system will be sized to accommodate future precipitation events; the DEIR should confirm that the stormwater management system will be designed to accommodate a 2070 25-year storm event or greater. The project will add a significant area of pavement and other impervious surfaces which could increase urban heat island effect. According to the ENF, the roofs of the hangars will be constructed of high albedo materials that will reflect sunlight rather than absorb it. High albedo paving materials will also be used in on-apron areas.

The DEIR should identify opportunities to increase resilience through enhancement of the site, including retention of mature trees on-site, increased open space and permeable surfaces. It should review strategies to adapt to extreme heat conditions and drought conditions throughout the useful life of the project. The DEIR should document all efforts taken to maximize the use of low impact design (LID) strategies for stormwater management, including rain gardens, bioretention areas, tree box filters, water quality swales, and green roofs. It should review the project's consistency with Massport's climate resiliency planning efforts and any design guidelines.

### *Greenhouse Gas (GHG) Emissions*

This project is subject to review under the May 5, 2010 MEPA GHG Policy. The Policy requires Proponents to quantify carbon dioxide (CO<sub>2</sub>) emissions and identify measures to avoid, minimize or mitigate such emissions. The analysis should quantify the direct and indirect CO<sub>2</sub> emissions of the project's energy use (stationary sources) and transportation-related emissions (mobile sources). Direct



emissions include on-site stationary sources, which typically emit GHGs by burning fossil fuel for heat, hot water, steam and other processes. Indirect emissions result from the consumption of energy, such as electricity, that is generated off-site by burning of fossil fuels, and from emissions from vehicles used by residents, employees, vendors, customers and others.

### *Stationary Sources*

The DEIR should include a GHG analysis for stationary sources prepared in accordance with the GHG Policy, guidance provided in the comment letter submitted by the Massachusetts Department of Energy Resources (DOER), which is incorporated in this Certificate in its entirety, and this Scope. According to DOER comments, significant updates to the commercial stretch building energy code will go into effect on July 1, 2023 (“July 2023 stretch code”),<sup>5</sup> which will apply to this project. The July 2023 stretch code makes significant changes and improvements to many sections of the code including envelope performance and thermal bridge accounting, ventilation energy recovery, electrification, ASHRAE Appendix G, and electric vehicle (EV) readiness. The DEIR should include an analysis that calculates and compares GHG emissions associated with a Base Case and a Preferred Alternative that achieves greater reductions in GHG emissions. The Base Case for the warehouse building should represent a building which meets the requirements of the July 2023 stretch code having a Building Performance Factor of 0.41 using ASHRAE 90.1 2019 Appendix G and the other mandatory requirements of Section C401.2.1 of the July 2023 stretch code.

The GHG analysis should clearly demonstrate consistency with the key objective of MEPA review, which is to document the means by which Damage to the Environment can be avoided, minimized and mitigated to the maximum extent feasible. The DEIR should identify the model used to analyze GHG emissions, clearly state modeling assumptions, explicitly note which GHG reduction measures have been modeled, and identify whether certain building design or operational GHG reduction measures will be mandated by the Proponent to future occupants or merely encouraged for adoption and implementation. The DEIR should include the modeling printouts for each alternative and emission tables that compare base case emissions in tons per year (tpy) with the Preferred Alternative showing the anticipated reduction in tpy and percentage by emissions source. Other tables and graphs, such as the table of mitigation measures recommended by DOER, may also be included to convey the GHG emissions and potential reductions associated with various mitigation measures as necessary. The DEIR should provide data and analysis in the format requested in DOER’s letter. The DEIR should clarify the proposed uses within the warehouse building (office, manufacturing, etc.) and what portion of the building this space will occupy.

The DEIR should clearly define all conditioned, semiheated and unconditioned spaces in proposed buildings and describe the degree to which interior spaces will be heated and cooled. It should present an evaluation of mitigation measures and recommendations identified in DOER’s comment letter. In particular, the feasibility of each of the mitigation measures outlined below should be assessed for each of the major project elements, and if feasible, GHG emissions reduction potential associated with major mitigation elements should be evaluated to assess the relative benefits of each measure. The DEIR should explain, in reasonable detail, why certain measures that could provide significant GHG

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<sup>5</sup> The details of this code are available here:

<https://www.mass.gov/info-details/stretch-energy-code-development-2022#final-code-language-for-stretch-code-update-and-new-specialized-stretch-code->

reductions were not selected – either because it is not applicable to the project or is deemed technically or financially infeasible. If financially infeasible, the DEIR should describe the cost effectiveness metrics that were used to evaluate feasibility, whether energy savings that would accrue to future tenants were considered, and what “payback period” the Proponent would deem to be reasonable given the financial constraints identified. It should include a review of available financial incentives potentially available for the project, as described in DOER’s comment letter. At a minimum, the DEIR should consider the following GHG mitigation measures:

- Maintaining envelope integrity with framed, insulated walls with continuous insulation, low air infiltration (confirmed with in-building testing), eliminating thermal bridging, ventilation energy recovery and management of solar heat gains
- Minimizing glass curtain wall assemblies and excessive windows
- Efficient electrification of space heating with either full electrification of space heating with air source heat pumps (ASHPs), or a hybrid of ASHP for primary heating and gas space heating for secondary heating
- Efficient electrification of water heating with ASHPs
- Maximized rooftop solar-readiness (at least 80%) and installed photovoltaic (PV)
- Maximized electric vehicle (EV) charging equipment (10-15% of spaces) and EV ready spaces (20-25% of spaces)

According to the ENF, the proposed hangar buildings could support an approximately 4.6-megawatt (MW) rooftop solar photovoltaic (PV) generating system. The DEIR should review the design and feasibility of the potential rooftop PV system.

#### *Mobile Sources*

The GHG analysis should include an evaluation of potential GHG emissions associated with mobile emissions sources. To the extent a traffic study is not conducted, the DEIR may provide estimates based on comparable uses or estimates provided in the 2017 ESPR or 2022 ESPR, if available. The DEIR should follow the guidance provided in the GHG Policy for *Indirect Emissions from Transportation* to determine mobile emissions for Existing Conditions, Build Conditions, and Build Conditions with Mitigation. The DEIR should describe truck loading and staging activities and estimate GHG emissions from idling. The Proponent should thoroughly explore means to reduce overall single occupancy vehicle trips and to minimize air emissions from diesel vehicle traffic. The DEIR should also review measures to promote the use of low-emissions vehicles, including installing EV charging stations and providing designated parking spaces for these vehicles (a minimum of 25% of proposed spaces) with the balance of spaces being EV ready for future installation.<sup>6</sup> The Build with Mitigation model should incorporate TDM measures, and any roadway improvements implemented by the project, and document the associated reductions in GHG emissions. The DEIR should explain how TDM measures will be monitored and adjusted over time and provide a methodology for quantifying emission reductions impacts rather than an assumed percentage reduction.

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<sup>6</sup> More information on EV infrastructure can be obtained from the MassEVolves program at [www.massevolves.org](http://www.massevolves.org).

### Hazardous Waste

According to the ENF, release of hazardous materials has been documented on the site, which has been assigned Release Tracking Number (RTN) #3-0035926 by MassDEP. According to MassDEP, EPA, Navy and Air Force, the project site overlaps with two Superfund sites which are being remediated and monitored by the Air Force and Navy. One of the sites is undergoing an evaluation for development of a plan to remediate PFAS. The project site may be subject to land use controls that must be maintained in order to prevent or reduce human health risks and could require further remediation based on the ongoing evaluations. The DEIR should provide a review of the history and remediation status of releases affecting the project site. It should address how the project will be designed to maintain the land use controls and minimize interference with potential monitoring and remediation activities in the future. I recommend that the Proponent consult with MassDEP, EPA, the Air Force and the Navy regarding the status of monitoring and remediation efforts and any constraints on land use, site design and/or construction practices that may be necessary.

### Cultural Resources and Open Space

The site is in an area considered to be archaeologically sensitive due to the proximity of known historic period and ancient Native American archaeological sites; in addition, it is in proximity to the Minute Man National Historical Park, which is a National Historic Landmark and listed in the National Register of Historic Places, and the U.S. Fish and Wildlife Service's (USFWS) Great Meadows National Wildlife Refuge. According to the ENF, the Navy Hangar, also known as the Raytheon Flight Test Facility (BED.555) has been determined to be eligible for listing in the National Register of Historic Places. The Proponent is pursuing state and federal historic rehabilitation tax credits for the renovation of the Navy Hangar.

As requested by MHC, the DEIR should include a historic resources assessment of historic properties within ¼ mile of the project site. Many commenters, including MHC, the National Park Service/Minute Man National Historical Park and USFWS expressed concern that the project will add to the impacts on historical, cultural and open space resources associated with noise, air emissions and vehicular traffic generated by Hanscom operations. The DEIR should provide an assessment of the project's impacts on these resources based on the analyses required above, including construction-period impacts.

### Construction Period

Many commenters expressed concern about potential construction-period impacts of the project, including construction vehicle traffic on residential streets. The DEIR should identify potential mitigation measures for minimizing construction impacts. It should describe how construction activities will 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 DEIR should describe all construction-period impacts and mitigation relative to noise, air quality, water quality, and traffic, including construction vehicle trips through residential areas. It should confirm that the project will require its construction contractors to use Ultra Low Sulfur Diesel fuel, and discuss the use of after-engine emissions controls, such as oxidation catalysts or diesel particulate filters. The DEIR should provide more information regarding the

project's generation, handling, recycling, and disposal of construction and demolition debris (C&D) and identify measures to reduce solid waste generated by the project. I encourage the Proponent to commit to C&D recycling activities as a sustainable measure for the project. Any contaminated material encountered during construction must be managed in accordance with the Massachusetts Contingency Plan (MCP; 310 CMR 40.00) and with prior notification to MassDEP. The project will be required to develop a Stormwater Pollution Prevention Plan (SWPPP) in accordance with its NPDES CGP to manage stormwater during the construction period. The DEIR should describe stormwater management measures that will be implemented during construction. It should describe potential construction period dewatering activities and associated permitting (i.e., NPDES) and identify mitigation measures. All construction-period mitigation measures should be listed in the draft Section 61 Findings.

### Mitigation and Draft Section 61 Findings

The DEIR 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 Proponent 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, EJ, 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.

The DEIR should include a commitment to provide a GHG self-certification to the MEPA Office upon construction of the building signed by an appropriate professional indicating that all of the GHG mitigation measures, or equivalent measures that are designed to collectively achieve identified reductions in stationary source GHG emission and transportation-related measures, have been incorporated into the project. If equivalent measures are adopted, the project is encouraged to commit to achieving the same level of GHG emissions (i.e., "carbon footprint") identified in the Preferred Alternative expressed as a volumetric measure (tpy) in addition to a percentage GHG reduction from Base Case. The commitment to provide this self-certification in the manner outlined above should be incorporated into the draft Section 61 Findings included in the DEIR.

### Responses to Comments

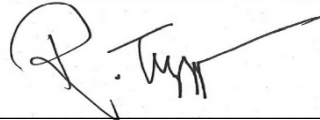
The DEIR should contain a copy of this Certificate and a copy of each comment letter received. It should include a comprehensive response to comments on the ENF that specifically address each issue raised in the comment letter; references to a chapter or sections of the DEIR alone are not adequate and 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 DEIR beyond what has been expressly identified in this certificate.

Circulation

In accordance with 301 CMR 11.16, the Proponent should circulate the DEIR to each Person or Agency who commented on the ENF, each Agency from which the project 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 DEIR to commenters in a digital format (e.g., CD-ROM, USB drive) or post to an online website. However, the Proponent should make available a reasonable number of hard copies to accommodate those without convenient access to a computer to be distributed upon request on a first come, first served basis. The Proponent should send correspondence accompanying the digital copy or identifying the web address of the online version of the DEIR indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. A copy of the DEIR should be made available for review in the Bedford Public Library.

February 24, 2023

Date



Rebecca L. Tepper

Comments received:

Comments submitted on the MEPA Public Comments Portal

01/26/2023	Rachel Marcus
02/02/2023	Lincoln Miara
02/02/2023	David Lebling
02/03/2023	Peter Halpert
02/03/2023	Judith Sherman
02/06/2023	Scott Richardson
02/06/2023	Tom Haslett
02/06/2023	Masha Obolensky
02/07/2023	Barbara Katzenberg
02/07/2023	Elana McDermott
02/08/2023	Julie Godon
02/08/2023	John Edmondson
02/08/2023	Marlies Comjean
02/08/2023	Karlen Reed
02/08/2023	Samuel Melton
02/09/2023	Walter Gillett
02/09/2023	Yaun Ying
02/09/2023	Zach Abraham
02/09/2023	Seema Patel
02/10/2023	Jeff Miller
02/10/2023	Jonathan Stevens

02/10/2023 Hanscom Field Advisory Commission  
02/11/2023 Benjamin Shiller  
02/11/2023 Ross Perry  
02/11/2023 Courtney Eaton  
02/12/2023 Lisa Baylis  
02/12/2023 Kingsley and Leslie Brooks  
02/12/2023 Kathleen C. Aubrey  
02/12/2023 Katherine Durham  
02/12/2023 Patricia O'Hagan  
02/13/2023 Shannon von Thaden  
02/13/2023 Alex Pina  
02/13/2023 Heidi Melvin  
02/13/2023 Heather Patterson  
02/13/2023 Stephen Goodman  
02/13/2023 Kathleen Sullivan  
02/13/2023 Audrey Gasteier  
02/13/2023 Malcom Bryant  
02/13/2023 Christine Grabenstatter  
02/13/2023 Mohammed Hannan  
02/13/2023 Kristine Bowring  
02/13/2023 Rajeev Voleti  
02/13/2023 Sue Davis  
02/13/2023 Erin Sharaf  
02/13/2023 Daniel Apczynski  
02/13/2023 Irina Mladenova  
02/13/2023 Scott Clary  
02/13/2023 Clement Tarpey  
02/13/2023 Kati Oates  
02/13/2023 Carrie Benis  
02/13/2023 Shelley Peterson  
02/13/2023 Kate McLaughlin  
02/13/2023 Melanie Haines  
02/13/2023 Town of Lexington  
02/13/2023 Belinda Gingrich  
02/13/2023 Jeannine Taylor  
02/13/2023 Lincoln Planning Board  
02/13/2023 Anonymous  
02/13/2023 Mark Howell  
02/13/2023 Brian Jalet  
02/13/2023 Marlene Mandel  
02/13/2023 Kimberly Jalet  
02/13/2023 Nora Murphy  
02/13/2023 Gregory Haines  
02/14/2023 Molly Haskell  
02/14/2023 Susan O'Dell  
02/14/2023 Robert Webber

02/14/2023 Kelly Korenak  
02/14/2023 Sarah Lance  
02/14/2023 ethan\_the\_dog@yahoo.com  
02/14/2023 Cris Perez  
02/14/2023 Richard Canale  
02/14/2023 Annemarie Calhoun  
02/14/2023 lindawm@yahoo.com  
02/14/2023 Town of Lexington  
02/14/2023 Mustafa Karabas  
02/14/2023 Kimberly Rajdev  
02/14/2023 Paula Rose  
02/14/2023 Christine Damon  
02/14/2023 Douglas Elder  
02/14/2023 Lawrence Buell  
02/14/2023 Concord Select Board  
02/14/2023 Robert Hamilton  
02/14/2023 Lincoln Greenhill  
02/14/2023 Jill M. Sandeen  
02/14/2023 Lisa Elder  
02/14/2023 Massport Community Advisory Committee  
02/14/2023 Faith Crisley  
02/14/2023 Laura Koller  
02/14/2023 Save Our Heritage  
02/14/2023 Andrew Kvaal  
02/14/2023 Town of Bedford  
02/14/2023 Scott Milne  
02/14/2023 Randi Currier  
02/14/2023 James Poage  
02/14/2023 Bradford Von Thaden  
02/14/2023 Anonymous  
02/14/2023 Joe Selle  
02/14/2023 Wenjen Hwang  
02/14/2023 Mark Murphy  
02/14/2023 Philana Gnatowski  
02/14/2023 Jessica Packineau  
02/14/2023 Shahinaz Carson  
02/14/2023 Doug Carson  
02/14/2023 D. Jong  
02/14/2023 Cheryl Gray

Comments Submitted by Email

02/02/2023 Irene Kowal  
02/03/2023 Mothers Out Front Lincoln (144 signers)  
02/03/2023 Susan Frommer  
02/03/2023 U.S. Navy

02/04/2023 Jennifer Boles  
02/05/2023 Amy McCoy  
02/06/2023 Christine Damon  
02/06/2023 David Eliades  
02/06/2023 Jen Murray  
02/06/2023 Kingsley and Leslie Brooks  
02/06/2023 Mark Hanson  
02/06/2023 Robert A McClatchey  
02/06/2023 Tom Haslett  
02/06/2023 Virginia Lemire  
02/07/2023 Brenda Herschbach Jarrell  
02/07/2023 David Saletnik  
02/07/2023 Gary Davis  
02/07/2023 Lincoln Planning Board  
02/07/2023 Paul Gingrich  
02/08/2023 Amy McCoy  
02/08/2023 Annursnac Hill Association  
02/08/2023 Eliza Shulman  
02/08/2023 Gail O'Keefe  
02/08/2023 U.S. Air Force  
02/08/2023 J. Yoshida  
02/08/2023 Nancy Shepard  
02/08/2023 Sallye Bleiberg  
02/08/2023 William Kemeza  
02/09/2023 Betsy Devine  
02/09/2023 Bob Creech  
02/09/2023 Cristine Van Dyke  
02/09/2023 Donald Saletnik  
02/09/2023 Elizabeth Await  
02/09/2023 Gary Davis  
02/09/2023 Hanscom Field Advisory Commission  
02/09/2023 Isabel Bailey  
02/09/2023 Jay W. Vogt  
02/09/2023 Judy Stein  
02/09/2023 Kendra Elliott  
02/09/2023 Nicole Palmer  
02/09/2023 Rick Moore  
02/09/2023 Robert Enders  
02/09/2023 Zach Abraham  
02/10/2023 Bonnie and David F. Polakoff  
02/10/2023 John Conley  
02/10/2023 Johnathan Stevens  
02/10/2023 Joyce Isen  
02/10/2023 Karen Belinky  
02/10/2023 Leda Zimmerman  
02/10/2023 Paul Shelman



02/10/2023 Save Our Heritage  
02/10/2023 Thomas P Flannery  
02/10/2023 Vicky Diadiuk  
02/11/2023 Adam Liberman  
02/11/2023 Dustin Tingley  
02/11/2023 Elaine Jones  
02/11/2023 Heather Packard  
02/11/2023 Joshua Newman  
02/11/2023 Roy McCloskey  
02/11/2023 Susan Jancourtz  
02/11/2023 Walter Gillett  
02/12/2023 Bija Satterlee  
02/12/2023 Brooks Stevens  
02/12/2023 Catherine Parmelee  
02/12/2023 Daniel L Schrage  
02/12/2023 David Pillbeam and Maryellen Ruvolo  
02/12/2023 Emma Melton  
02/12/2023 Heidi Kaiter  
02/12/2023 Jai Kaur Annamaria San Antonio  
02/12/2023 Janet C Miller  
02/12/2023 Kate Kavanaugh  
02/12/2023 Laurie O'Neill and George Lauder  
02/12/2023 Marian Hobbs  
02/12/2023 Thomas P Flannery  
02/12/2023 Wendy Reasenberg  
02/13/2023 Carol and David Haines  
02/13/2023 Richard Baughman and Petition with 105 signers  
02/13/2023 Adrienne Kimmell  
02/13/2023 Alex Chatfield  
02/13/2023 Alex Pina  
02/13/2023 Anirban Chatterjee  
02/13/2023 Ann and Nathan Parke  
02/13/2023 Anne Lovell  
02/13/2023 Ben McLaughlin  
02/13/2023 Carrie Benis  
02/13/2023 Chip and Deliana Ernst  
02/13/2023 Coreen Garrett  
02/13/2023 David L. Negrin  
02/13/2023 Dennis Frenchman  
02/13/2023 Dereck Blackburn and Rebecca Hazelton  
02/13/2023 Dilla Tingley  
02/13/2023 Doug Carson  
02/13/2023 Edward Sonn  
02/13/2023 Ellen Sebring  
02/13/2023 U.S. Environmental Protection Agency (EPA)  
02/13/2023 Erika Maalouf

02/13/2023 Gail O'Keefe  
02/13/2023 Gale S. Haydock  
02/13/2023 Ira N. Goldman  
02/13/2023 Isac Lee  
02/13/2023 Jeannine Taylor  
02/13/2023 John Mandler  
02/13/2023 Josh Tabata  
02/13/2023 Joy Duffy  
02/13/2023 Judith and Paul Newman  
02/13/2023 Kate Flora  
02/13/2023 Kate McKaughlin  
02/13/2023 Kate Rossetti  
02/13/2023 Kathryn Rifkin  
02/13/2023 Kay Corry Aubrey  
02/13/2023 Kenda Carlson  
02/13/2023 Kimberly Jalet  
02/13/2023 Laura Crosby  
02/13/2023 Lincoln Select Board  
02/13/2023 Mary Fenoglio and Warren Covert  
02/13/2023 Mary White  
02/13/2023 Melissa Karczewski  
02/13/2023 Melita Sawyer  
02/13/2023 National Park Service  
02/13/2023 Neil Dale  
02/13/2023 Nicholas Ribush  
02/13/2023 Nina Hackel  
02/13/2023 Pat Keane  
02/13/2023 Patrick Eaton  
02/13/2023 Phoebe Francis  
02/13/2023 Robin Wilkerson  
02/13/2023 Sharon and Peter Burke  
02/13/2023 Sue Davis  
02/13/2023 Susan Stason  
02/13/2023 Town of Bedford  
02/14/2023 Amanda Patrick  
02/14/2023 Amy Cook/Wright  
02/14/2023 Andrew S Pang  
02/14/2023 Anne Buxton Sobol  
02/14/2023 Aparajita Chatterjee  
02/14/2023 Barbara Williams  
02/14/2023 Bobbi Eliades  
02/14/2023 Brian Hough  
02/14/2023 Caitlin Selle and Alec Walker  
02/14/2023 Carol Boris  
02/14/2023 Carolyn Montie  
02/14/2023 Cheryl Mandler

02/14/2023 Chris Pace  
02/14/2023 Christie and James Martin  
02/14/2023 Christie Martin  
02/14/2023 Christine Size  
02/14/2023 Christine Wojnar  
02/14/2023 Concord Historical Commission  
02/14/2023 Concord Select Board  
02/14/2023 Corinne Doud  
02/14/2023 Craig Nicholson  
02/14/2023 Cynthia Frenkil  
02/14/2023 David McCoy  
02/14/2023 David W Swain and 5 co-signers  
02/14/2023 David Williams  
02/14/2023 Dimitrios Stefanis  
02/14/2023 Doug Elder  
02/14/2023 Drew Chrostek  
02/14/2023 Edward C. Kern, Jr. and Priscilla D. Kern  
02/14/2023 Edward Young  
02/14/2023 Elizabeth Coules  
02/14/2023 Ellen O'Donnell  
02/14/2023 Erin Quackenbush  
02/14/2023 Fernando Colon Osorio and Laurie Margolies  
02/14/2023 Gail Hire  
02/14/2023 Garret Whitney  
02/14/2023 Hope O'Brien Jones  
02/14/2023 Iris Brough  
02/14/2023 Ismail Nabih  
02/14/2023 J. Francis Stein  
02/14/2023 James F Williams  
02/14/2023 Janice Locke  
02/14/2023 Jeanne P. Canale  
02/14/2023 Jenn Lachey  
02/14/2023 Jennifer Boles  
02/14/2023 Jim and Iryna McDonald  
02/14/2023 Joan Geoghegan  
02/14/2023 Joan Wolcott Elliott  
02/14/2023 Jon Andersen/Miller  
02/14/2023 Joseph Selle  
02/14/2023 Joseph Stein  
02/14/2023 Kate Chartener  
02/14/2023 Kate Dimancescu  
02/14/2023 Katherine Ives  
02/14/2023 Katrina L. Kelner and Norman Hershkowitz  
02/14/2023 Ken Farbstein  
02/14/2023 Ken Fischl  
02/14/2023 Kirthana Beaulac

02/14/2023 Kristen Hough  
02/14/2023 Laura Davis  
02/14/2023 Lauren Herbert  
02/14/2023 Lila Selle  
02/14/2023 Lincoln Green Energy Committee  
02/14/2023 Lincoln Land Conservation Trust  
02/14/2023 Linda D. White and Robert R. White  
02/14/2023 Linda Lazar  
02/14/2023 Linda Rudd  
02/14/2023 Marcie R. Black  
02/14/2023 Margo Fisher-Martin  
02/14/2023 Mark Gailus and Tanya Gailus  
02/14/2023 Mark M. Myles  
02/14/2023 Mark Rubman  
02/14/2023 Mark Sutherland  
02/14/2023 Mary Kostman  
02/14/2023 Mary Stechschulte  
02/14/2023 Massachusetts Department of Environmental Protection (MassDEP)  
02/14/2023 Massport Community Advisory Committee  
02/14/2023 Matthew Gasteier  
02/14/2023 Melanie Coo  
02/14/2023 Melinda Ballou  
02/14/2023 Massachusetts Historical Commission (MHC)  
02/14/2023 Mitchell and Sara Levine  
02/14/2023 Padma Choudry  
02/14/2023 Pamela Nelson  
02/14/2023 Patricia and Steve Dahlgren  
02/14/2023 Patrick J. Stevens  
02/14/2023 Peter and Lucy Sprayregen  
02/14/2023 Randi Currier  
02/14/2023 Ray Considine and Edie Lipinski  
02/14/2023 Representative Kenneth I. Gordon  
02/14/2023 Representative Michelle Ciccolo  
02/14/2023 Richard Canale  
02/14/2023 Rosemary Tolwinski  
02/14/2023 Roy Collings  
02/14/2023 Rural Land Foundation  
02/14/2023 Russell Gershman  
02/14/2023 Sally Kindleberger  
02/14/2023 Sandy Currier  
02/14/2023 Sara Cherkerzian  
02/14/2023 Sara Mattes  
02/14/2023 Scott Mirabiro  
02/14/2023 Scott Rodman  
02/14/2023 Shah Carson  
02/14/2023 Stuart Fried and Louise Berliner

02/14/2023 Susan and George Seeley  
02/14/2023 Susan Foster Jones  
02/14/2023 The Walden Woods Project  
02/14/2023 Thomas and Joan Kenny  
02/14/2023 Timothy M. Jones  
02/14/2023 Tina A. Grotzer  
02/14/2023 Town of Lexington  
02/14/2023 U.S. Fish and Wildlife Service (USFWS)  
02/14/2023 Valerie Gurney and Matt Daniel  
02/14/2023 Virginia Lemire  
02/14/2023 Virginia Welles  
02/14/2023 WIDE Lincoln  
02/14/2023 William J. Freitas  
02/14/2023 William Stason  
02/15/2023 Igor Dobrusin  
02/15/2023 James Carlson  
02/15/2023 Jessica Cooper  
02/15/2023 Massachusetts Water Resources Authority (MWRA)  
02/15/2023 Robin Dobrusin  
02/16/2023 Marlies Henderson  
02/17/2023 Jill Baker  
02/17/2023 Anne Lehmann  
02/19/2023 Linda Shalon  
02/20/2023 Senator Mike Barrett and 33 co-signers  
02/21/2023 Gina and Metin Elyazar  
02/21/2023 Kati Winchell  
02/21/2023 Tabassum Huseni  
02/22/2023 Department of Energy Resources (DOER)  
02/22/2023 Vincent Da Forno  
02/23/2023 Christen Hart

RLT/AJS/ajs



alexander.strysky@mass.gov

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# View Comment

## Comment Details

<b>EEA #/MEPA ID</b> 16654	<b>First Name</b> Rachel	<b>Address Line 1</b> 38 Glenridge Dr	<b>Organization</b> --
<b>Comments Submit Date</b> 1-26-2023	<b>Last Name</b> Marcus	<b>Address Line 2</b> --	<b>Affiliation Description</b> Individual
<b>Certificate Action Date</b> 2-14-2023	<b>Phone</b> --	<b>State</b> MASSACHUSETTS	<b>Status</b> Opened
<b>Reviewer</b> Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	<b>Email</b> rasilver@gmail.com	<b>Zip Code</b> 01730	

## Comment Title or Subject

Topic: Neighborhood impact

## Comments

↶ ↷ **B** *I* U Segoe UI ▼ 10 pt ▼ **A** ▼ ▼ X<sub>2</sub> X<sup>2</sup> **t**<sub>t</sub> **T**<sub>T</sub> Paragraph ▼ ▼ ▼ ▼ ▼ ↶ ↷

Please consider the impact to neighbors and community members, including noise, traffic, light, pollution, etc. The proposed development is located in close proximity to neighborhoods that value safety, quiet and tranquil environments. We certainly don't want an increase in noise pollution tarnishing the streets where our kids play. In addition and to offset some of the negative impacts to neighbors, this project should partner with the local school district to offer STEM based educational opportunities and field trips to local

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## Comment Details

<b>EEA #/MEPA ID</b> 16654	<b>First Name</b> David	<b>Address Line 1</b> 618 Annursnac Hill Road	<b>Organization</b> --
<b>Comments Submit Date</b> 2-2-2023	<b>Last Name</b> Lebling	<b>Address Line 2</b> --	<b>Affiliation Description</b> Individual
<b>Certificate Action Date</b> 2-14-2023	<b>Phone</b> --	<b>State</b> MASSACHUSETTS	<b>Status</b> Opened
<b>Reviewer</b> Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	<b>Email</b> dlebling@hyraxes.com	<b>Zip Code</b> 01742	

## Comment Title or Subject

Topic: RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

## Comments

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I strongly oppose the expansion of the North Airfield.

I have lived near Hanscom AFB/Field for over thirty years, directly under the main flight path. (I live on Annursnac Hill in Concord, to be specific.)

During that thirty years the traffic level in and out of Hanscom has continuously increased. There is jet noise almost all the time, especially during the prime take off and landing times. There is also prop noise from small aircraft, sometimes just a few hundred feet above my house and stacked up one after another (touch and go pilot training?).

The idea that the North Airfield will "enable larger, heavier aircraft" is frightening. We get enough noise as it is. In Summer, when one wants to be outdoors, the noise drowns out any outdoor activity. You can't even talk to someone sitting next to you.

The extra burden on traffic and the environment in the vicinity of the airfield is also a problem, not to mention the close proximity to the Minuteman National Park.

I supported Hanscom (even worked there) back when it was primarily an AFB. They served a useful purpose. Hanscom as proposed is nothing more than a millionaire's playground. Too many FBOs, too many "business jets."

Do not go forward with this project.

Thank you,  
David Lebling  
Concord, MA

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**From:** [Irene Kowal](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom development  
**Date:** Thursday, February 2, 2023 2:27:58 PM

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**CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

I am adamantly opposed to Hanscom Airport being further developed. We continually hear planes overhead every 5-10 minutes and we refuse to listen to yet more planes overhead.

Best,  
Irene Kowal  
265 College Road  
Concord, MA 01742





alexander.strysky@mass.gov

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## Comment Details

<b>EEA #/MEPA ID</b> 16654	<b>First Name</b> Lincoln	<b>Address Line 1</b> 37 N Great Rd	<b>Organization</b> --
<b>Comments Submit Date</b> 2-2-2023	<b>Last Name</b> Miara	<b>Address Line 2</b> --	<b>Affiliation Description</b> Individual
<b>Certificate Action Date</b> 2-14-2023	<b>Phone</b> --	<b>State</b> MASSACHUSETTS	<b>Status</b> Opened
<b>Reviewer</b> Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	<b>Email</b> Imiara@gmail.com	<b>Zip Code</b> 01773	

## Comment Title or Subject

Topic: No to increased pollution

## Comments

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In this era of deep income inequality and its explicit impact on deepening the climate crisis, it is unconscionable that the state would be entertaining the expansion of private jet use. I live a mile from the end of the south runway and the airplane noise is already unbearable with the little planes spewing leaded fumes all over the neighborhood. There can be no net benefit to the towns or state to increasing the use of this airport for private jets. It's well documented how many emissions per passenger mile are contributed by private jets. Instead the state should focus on productive endeavors like building transit oriented affordable housing to improve the livelihood of its citizens and decrease our carbon footprint.

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alexander.strysky@mass.gov

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## Comment Details

<b>EEA #/MEPA ID</b> 16654	<b>First Name</b> Judith	<b>Address Line 1</b> 335 Hemlock Circle	<b>Organization</b> self
<b>Comments Submit Date</b> 2-3-2023	<b>Last Name</b> Sherman	<b>Address Line 2</b> --	<b>Affiliation Description</b> Individual
<b>Certificate Action Date</b> 2-14-2023	<b>Phone</b> --	<b>State</b> MASSACHUSETTS	<b>Status</b> Opened
<b>Reviewer</b> Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	<b>Email</b> jsherman263@gmail.com	<b>Zip Code</b> 01773	

## Comment Title or Subject

Topic: Stop Hanscom Field Expansion

## Comments

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Hanscom Field is in a unique area surrounded by historic and natural resources of local, state, and national significance. These resources cannot be shielded from airport impacts or relocated. Together, these resources draw millions of tourists per year to Massachusetts and provide a major contribution to the Massachusetts economy. The Hanscom communities view themselves as rural residential communities with a tremendous responsibility to care for and protect the special natural and historic resources located in their midst. The communities have all expressed their positions on Hanscom Field through the town meeting process. These votes were in each town unanimous. In addition, a recent [MIT - BankBoston study](https://saveourheritage.com/Library_Docs/Bank%20Boston%20Impact%20of%20Innovation.pdf) indicates that the character and quality of life of communities like these are the primary driver of location decisions of High Tech companies and are as a result a primary driver of the Massachusetts economy. No economic analysis shows that the current or potential expansion of Hanscom Field is good for the local, State, or National economy. It will only serve the narrow interests of luxury private jet owners and the financial interests of the company expanding the airfield. Growing Hanscom Field is a poor economic decision for the future and will impose irreparable harm on the adjacent communities, and the cultural and natural environment.

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## **Mothers Out Front Lincoln Public Comment in Response to EEA #16654 February 3, 2023**

Mothers Out Front Lincoln opposes the proposed development and expansion of Hanscom Field North Airfield. Our Lincoln team is an ambitious group of mothers, grandmothers, and caregivers ready to take on the many important environmental challenges we face, both locally and globally. We are excited to be joining a powerful grassroots movement to ensure a swift, complete, and just transition away from fossil fuels. We believe EEA #16654 would negatively impact our community and contribute to climate change and environmental degradation at a time when we are trying to move toward net-zero. Further, we have concerns about the impacts of expansion on environmental justice communities.

Climate change is an emergency that requires urgent action to move away from fossil fuel emissions. EEA #16654 would increase fossil fuel emissions. Despite claims of reduced ferry flights, there is no supporting data available to the public. Prior similar expansions failed to reduce ferry flights. Private jets are a particular concern, with an outsized carbon footprint for the very wealthy. Our children and grandchildren need a liveable future. We cannot accept profits for the few now that lead to a cascade of harmful effects for everyone else into the future.

Paving and construction for EEA #16654 creates more runoff and reduces soil-based carbon storage potential and wildlife habitat. Runoff from paved surfaces of an airfield likely carries pollution, increasing the burden for wastewater treatment and creating potential for untreated water to contaminate local waterways. Paving and construction on open spaces means loss of a critical nature-based climate solution: when there are no longer plants to capture carbon from the atmosphere, they can no longer store a portion of that carbon in the soil. Building also causes habitat destruction, stressing wildlife and potentially leading to a loss of biodiversity that makes our ecosystems less resilient in the face of our changing climate. We as humans are interconnected members of our ecosystems; what hurts wildlife, ultimately hurts us.

A portion of the communities around Hanscom Airfield are environmental justice populations, as defined by the state's Executive Office of Energy and Environmental Affairs. These are communities already burdened by noise pollution and water quality concerns, including lead contamination in water. EEA #16654 would only increase burdens on these communities. We do not believe the planning process sufficiently included the voices and input of surrounding environmental justice communities.

We believe EEA #16654 represents an example of profits over people. We see Hanscom as a part of the Lincoln community. We urge you to do the same, and in light of the myriad negative community impacts posed by EEA #16654, consider the broader and longer-lasting benefits of leaving space undeveloped. We are particularly concerned about development that enables further fossil fuel emissions, as in this case. We urge you to rethink EEA #16654 and bring in broader community engagement, including from environmental justice communities.

## **Names and Addresses**

1. Rachel Neurath  
115 Trapelo Rd, Lincoln
2. Jesse Lefkowitz  
115 Trapelo Rd, Lincoln
3. Emily Haslett  
26 Baker Bridge Rd, Lincoln
4. Tom Haslett  
26 Baker Bridge Rd, Lincoln
5. Patricia O'Hagan  
270 Concord Rd, Lincoln
6. Alex Chatfield  
270 Concord Rd, Lincoln
7. Staci Montori  
84 Concord Rd, Lincoln
8. John Bordiuk, MD  
84 Concord Rd, Lincoln
9. Candace Pearson  
1 Moccasin Hill Rd, Lincoln
10. Amanda Hill  
53 Lincoln Rd, Lincoln
11. Margo Fisher-Martin  
14 Giles Rd, Lincoln
12. Priscilla D Kern  
41 Laurel Drive, Lincoln
13. Emma Melton  
20 Hillside Rd, Lincoln
14. Brad Vettraino  
20 Hillside Rd, Lincoln

15. Karen Neurath  
33 Farrar Rd, Lincoln
16. Paul Neurath  
33 Farrar Rd, Lincoln
17. Caroline Marotta  
18 Todd Pond Road, Lincoln
18. Melanie Schorr Haines, MD  
41 Lincoln Rd, Lincoln
19. Greg Haines  
41 Lincoln Rd, Lincoln
20. Terry Perlmutter  
90 Todd Pond Rd, Lincoln
21. Elizabeth Orgel  
237 Old Concord Rd, Lincoln
22. Robert Orgel  
237 Old Concord Rd, Lincoln
23. Caroline Orgel  
237 Old Concord Rd, Lincoln
24. Susan Seeley  
212 Concord Rd, Lincoln
25. George Seeley  
212 Concord Rd, Lincoln
26. Carol Roede  
82 Conant Rd, Lincoln
27. Robin Wilkerson  
31 Old Winter St, Lincoln
28. Elizabeth Cherniack  
1 Harvest Circle 335, Lincoln
29. Diana Smith  
8 Trapelo Road, Lincoln

30. Lynne Smith  
5 Tabor Hill Road, Lincoln
31. Gwyneth Loud  
64 Conant Rd, Lincoln
32. Nancy B. Soulette  
1 Woods End Road, Lincoln
33. Anne Buxton Sobol  
10 Beaver Pond Road, Lincoln
34. Gail Alden  
240 Concord Rd, Lincoln
35. Nolan Watts  
240 Concord Rd, Lincoln
36. Chris Damon  
110 Old Concord Rd, Lincoln
37. Nancy Fleming  
110 Old Concord Rd, Lincoln
38. Julia Kardon  
51 Stonehedge Rd, Lincoln
39. Niels Bradshaw  
51 Stonehedge Rd, Lincoln
40. Susan Klem  
168 Trapelo Road, Lincoln
41. Eniana Tabor  
219 Sandy Pond Road, Lincoln
42. Jacob Tabor  
219 Sandy Pond Road, Lincoln
43. Danielle Solar  
20 Horseshoe Lane, Lincoln
44. Josh Solar  
20 Horseshoe Lane, Lincoln

45. Diana A. E. Rice-Sheahan  
219 Concord Rd, Lincoln
46. Amy Lohman  
53 S. Great Rd, Lincoln
47. Charles Sykes  
31 Baker Farm Rd, Lincoln
48. John Mendelson  
30 Tower Road, Lincoln
49. Joan Kimball  
14 Hillside Road, Lincoln
50. Lawrence Buell  
60 Tower Road, Lincoln
51. Phyllis K Buell  
60 Tower Road, Lincoln
52. Jena Salon  
27R South Commons, Lincoln
53. Lucy Maulsby  
30 Tower Rd, Lincoln
54. Abbey Salon  
3B South Commons, Lincoln
55. Stacey Mulroy  
27r South Commons, Lincoln
56. Beverly Tomasic Bowman  
22 Goose Pond Rd, Lincoln
57. Carol Boris  
312 Hemlock Circle, Lincoln
58. Jasmine Dhar  
42 Bypass Rd, Lincoln
59. Catherine Bitter  
245 Tower Road, Lincoln

60. Katrin Roush  
30 Old Sudbury Rd, Lincoln
61. Eri Buitrago  
79 Autumn Lane, Lincoln
62. Lincoln Miara  
37 N Great Rd, Lincoln
63. Charlotte Kuperwasser  
149 Old County Rd, Lincoln
64. Jennifer Lachey  
99 Tower Road, Lincoln
65. Kimberly Jalet  
19 Brooks Road, Lincoln
66. Brian Jalet  
19 Brooks Road, Lincoln
67. Cynthia Bencal  
5C South Commons, Lincoln
68. Moha Desai  
76 Trapelo Road, Lincoln
69. Sally Hollister  
139 Bedford Road, Lincoln
70. Judith Sherman  
335 Hemlock Circle, Lincoln
71. Peter Halpert  
335 Hemlock Circle, Lincoln
72. Zoe Halpert  
335 Hemlock Circle, Lincoln
73. Sage Halpert  
335 Hemlock Circle, Lincoln
74. Theresa Kafina  
5 Giles Road, Lincoln



75. Sarah Kindleberger  
14 A North Commons, Lincoln
76. Mary Crowe  
66 Bedford Rd, Lincoln
77. Robin Rawls  
36 Lincoln Road, Lincoln
78. Danelle Shah  
17R South Commons, Lincoln
79. Susan Stason  
29 Sandy Pond Rd, Lincoln
80. Kathleen Shepard  
37 Beaver Pond Road, Lincoln
81. Hilary Dionne  
105 Trapelo Rd, Lincoln
82. Camille Petri  
252 Lincoln Road, Lincoln
83. Ethan Healy  
148 Lincoln Road, Lincoln
84. Penelope Perez-DeNormandie  
11 Old Concord Road, Lincoln
85. Marlene Major  
59 Oxbow Road, Lincoln
86. Jessica Jacobs  
26 Laurel Dr, Lincoln
87. Constance Lewis  
19C South Commons, Lincoln
88. Christine Lundblad  
27L Battle Road Farm, Lincoln
89. Laurs Berland  
15 Hillside Rd, Lincoln

90. Margaret McLaughlin  
7 Deer Run Road, Lincoln
91. Amanda Hill  
53 Lincoln Rd., Box 653, Lincoln
92. Rachel Mason  
289 South Great Rd, Lincoln
93. Annemarie Calhoun  
23A South Commons, Lincoln
94. Rachel Marie Schachter  
8 Todd Pond Rd, Lincoln
95. Nancy Henderson  
6 Giles Rd, Lincoln
96. James Henderson  
6 Giles Rd, Lincoln
97. Patricia Moore  
29B , South Commons, Lincoln
98. Samir Desai  
62 Davison Drive, Lincoln
99. Nilima Desai  
62 Davison Drive, Lincoln
100. Ursula Nowak  
33 Conant Rd, Lincoln
101. Martin Nowak  
33 Conant Road, Lincoln
102. Cheryl Rodgers  
57 Wells Road, Lincoln
103. Nancy Fincke  
14 Moccasin Hill Rd, Lincoln
104. Philana Gnatowski  
11 Linway Road, Lincoln

105. Dongwoo Park  
6C N Commons, Lincoln
106. William Stason  
2A N Commons, Lincoln
107. Sarah Holbrook  
42 Indian Camp Lane Lincoln
108. Sara Kooima  
16 North Commons, Lincoln
109. Christine Lundblad  
27L South Commons, Lincoln
110. Alan Basmajian  
27L South Commons, Lincoln
111. Masha Obolensky  
25 South Commons, Lincoln
112. George Holbrook  
42 Indian Camp Lane, Lincoln
113. Lauren Herbert  
3D South Commons, Lincoln
114. Hope White  
4R North Commons, Lincoln
115. Ann Miller  
9C South Commons, Lincoln
116. Joan Wolcott Elliott  
36A Indian Camp Lane, Lincoln
117. Barry Lenick  
42A Indian Camp Lane, Lincoln
118. Rebecca Lenick  
42A Indian Camp Lane, Lincoln
119. Patricia Darcy  
19A S Commons, Lincoln

120. Judith Stein  
11 C South Commons, Lincoln
121. Yurim Yi  
46D Indian Camp Ln, Lincoln
122. Rudolf Hulspas  
23D S Commons, Lincoln
123. George Chin  
24L Indian Camp Lane, Lincoln
124. Bryn Walsh  
55 Wells Rd, Lincoln
125. Désirée Joustra  
23D South Commons, Lincoln
126. Anne Lovell  
15C South Commons, Lincoln
127. Alex Pina  
14C N Commons, Lincoln
128. Lu Zhang  
14C N Commons, Lincoln
129. Sungil Jung  
46 D Indian Camp Ln, Lincoln
130. Travis Roland  
29 Wells Road, Lincoln
131. Miriam Stason  
2a North Commons, Lincoln
132. Craig Elliott  
36A Indian Camp Lane, Lincoln
133. Katy Walker  
12 Trapelo Road, Lincoln

- 134. Jane Layton  
26A Indian Camp Lane, Lincoln
- 135. Gary Davis  
20R Indian Camp Lane, Lincoln
- 136. Dale Ryder  
4 North commons unit L, Lincoln
- 137. Sue Wolff  
13R S Commons, Lincoln
- 138. Kathleen Sullivan  
5A South Commons, Lincoln

**Support Beyond Lincoln:**

- 139. Jess Myles  
298 Heaths Bridge Rd, Concord
- 140. David Negrin  
40 Bronson Way, Concord
- 141. Marissa Tomasic  
42A McKinley St., Maynard
- 142. George Vaill  
34 Edward Drive, Winchester
- 143. Kristen Blake  
25 Clement Court, Haverhill
- 144. Susan Winter  
128 Nimrod Drive, Concord



alexander.strysky@mass.gov

[Dashboard\(javascript:void\(0\);\)](#) > [View Comment\(javascript:void\(0\);\)](#)

# View Comment

## Comment Details

<b>EEA #/MEPA ID</b> 16654	<b>First Name</b> Peter	<b>Address Line 1</b> 335 Hemlock Circle	<b>Organization</b> self
<b>Comments Submit Date</b> 2-3-2023	<b>Last Name</b> Halpert	<b>Address Line 2</b> --	<b>Affiliation Description</b> Individual
<b>Certificate Action Date</b> 2-14-2023	<b>Phone</b> --	<b>State</b> MASSACHUSETTS	<b>Status</b> Opened
<b>Reviewer</b> Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	<b>Email</b> peterjhalpert@gmail.com	<b>Zip Code</b> 01773	

## Comment Title or Subject

Topic: Stop Hanscom Field North Airfield Development

## Comments

↶ ↷ **B I U** Segoe UI 10 pt **A**  $X_2 X^2$  **t t** **T T** Paragraph

Hanscom Field is in a unique area surrounded by historic and natural resources of local, state, and national significance. These resources cannot be shielded from airport impacts or relocated. Together, these resources draw millions of tourists per year to Massachusetts and provide a major contribution to the Massachusetts economy. The Hanscom communities view themselves as rural residential communities with a tremendous responsibility to care for and protect the special natural and historic resources located in their midst. The communities have all expressed their positions on Hanscom Field through the town meeting process. These votes were in each town unanimous. In addition, a recent [MIT - BankBoston study](https://saveourheritage.com/Library_Docs/Bank%20Boston%20Impact%20of%20Innovation.pdf) indicates that the character and quality of life of communities like these are the primary driver of location decisions of High Tech companies and are as a result a primary driver of the Massachusetts economy. No economic analysis shows that the current or potential expansion of Hanscom Field is good for the local, State, or National economy. It will only serve the narrow interests of luxury private jet owners and the financial interests of the company expanding the airfield. Growing Hanscom Field is a poor economic and poor environmental decision for both now and the future and will impose irreparable harm on the adjacent communities and land.

## Attachments

## Update Status

Status

Opened

SUBMIT

## Share Comment

SHARE WITH A REGISTERED USER

[BACK TO SEARCH RESULTS](#)

**From:** [Susan Frommer](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** " RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF "  
**Date:** Friday, February 3, 2023 11:50:14 AM

---

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Please, we have had enough development; we do not need anymore considering all the environmental disasters Global Warming is creating. We do not need private jets, or an expansion of Hanscom. Money and profit are not the most important things. Our planet and life does not need more plans and greed. Massport is only concerned with profit. Please no more expansion for the business elite. The communities need to protect the environment and their sanity!

**From:** [Ross, Eric G CIV USN NAVFAC MIDLANT NOR \(USA\)](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Field North Airfield Developments - Navy considerations  
**Date:** Friday, February 3, 2023 2:15:13 PM

---

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Good afternoon Alex,

I received a notice about the Hanscom Field North Airfield Development and felt it was a good time to reach out and introduce myself. I am the current Remedial Project Manager for the Navy at the adjacent NWIRP Bedford installation. As noted in the deed from the property transfer in 2019, there are restrictions on land use in this area (such as restricting residential use/requiring some documents to be reviewed by the Navy, EPA, and MassDEP/etc), and we still have the need to access this site periodically to collect groundwater samples.

Essentially, similar to the Air Force, there are environmental components of this property that we must ensure are considered. From what I've been hearing from the Air Force, these may already be part of your discussions. I will likely be attending public meetings (but not the upcoming site walk) when possible for awareness, however, please don't hesitate to reach out if you need any information.

V/R,

Eric Ross  
Remedial Project Manager  
Environmental Restoration North, EV35  
NAVFAC MIDLANT  
Phone:757-341-0481



**From:** [jjcb3@verizon.net](mailto:jjcb3@verizon.net)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Fwd: Latest Bedford Citizen article on North Airfield development, MEPA tour  
**Date:** Saturday, February 4, 2023 1:06:42 PM

---

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Alex,

Want to make sure you have this latest Bedford Citizen article re: the North Airfield development and Monday's MEPA site tour for your records:

<https://www.thebedfordcitizen.org/2023/02/proposed-hangar-project-sparks-regional-concerns/>

Best wishes -  
Jennifer Boles

**From:** [mccoy4@verizon.net](mailto:mccoy4@verizon.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** comments regarding EEA #16654  
**Date:** Sunday, February 5, 2023 6:53:16 PM  
**Attachments:** [Video.mov](#)

---

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Dear Mr. Strysky,

Thank you for the opportunity to provide a public comment regarding EEA #16654.

I am an Ayer resident. The arrival route into Hanscom Field is over both my town and my home and the noise is disruptive. FAA's Air Traffic Control slows jets to a speed of 288 mph over our area leading to a jet path that passes our home. The jet traffic can be below 2000ft. I am greatly concerned about the further negative impacts of the proposed North Airfield public/private expansion.

- Hanscom has been a burdensome noise nuisance in the town of Ayer since the closure of Ft. Devens. Mark Holzwarth's East Coast Aero Club calls the area in the vicinity of the closed Moore Army Airfield "theirs." Their aircraft concentrate over our homes - dumping noise and lead. The flight schools have been cited for violations of minimum safe altitudes - they are a bad neighbor. Massport turns a blind eye to the behavior and has made no attempt at a solution. Attached is an image illustrating the concentration of aircraft over Ayer.

- The Hanscom private jet impact in Ayer can be seen and heard in the attachments to this email. A ground sensor placed at Moore Army Airfield by MIT Lincoln Labs may have been used to determine the placement of the air route used by the Hanscom jets on arrival into KBED. Mass Development granted the lease to MIT LL.

- I attend Hanscom Field Advisory Commission meetings regularly. Massport has been evasive with their information sharing regarding this project proposal. Their engagement with the public has not been open and informative and does not feel transparent. It feels like they shared the absolute minimum needed in order to fulfill their public notification requirement - just enough to "check the box."

- The project fills a private want, not a public need for improved transportation solutions and the reduction of emissions. Residents cannot inquire about the air quality impacts because Massport has never tested the air quality at Hanscom Field.

- The claim that the project will cut down on "ferry flights" rings false. Massport's goal is to grow Hanscom traffic so as to not lose money year after year despite FAA grant money it receives annually for enplanements, etc. The developers have provided no data to back these claims. There is no discussion of capping the number of daily flights. To say there will be less noise is not backed up.

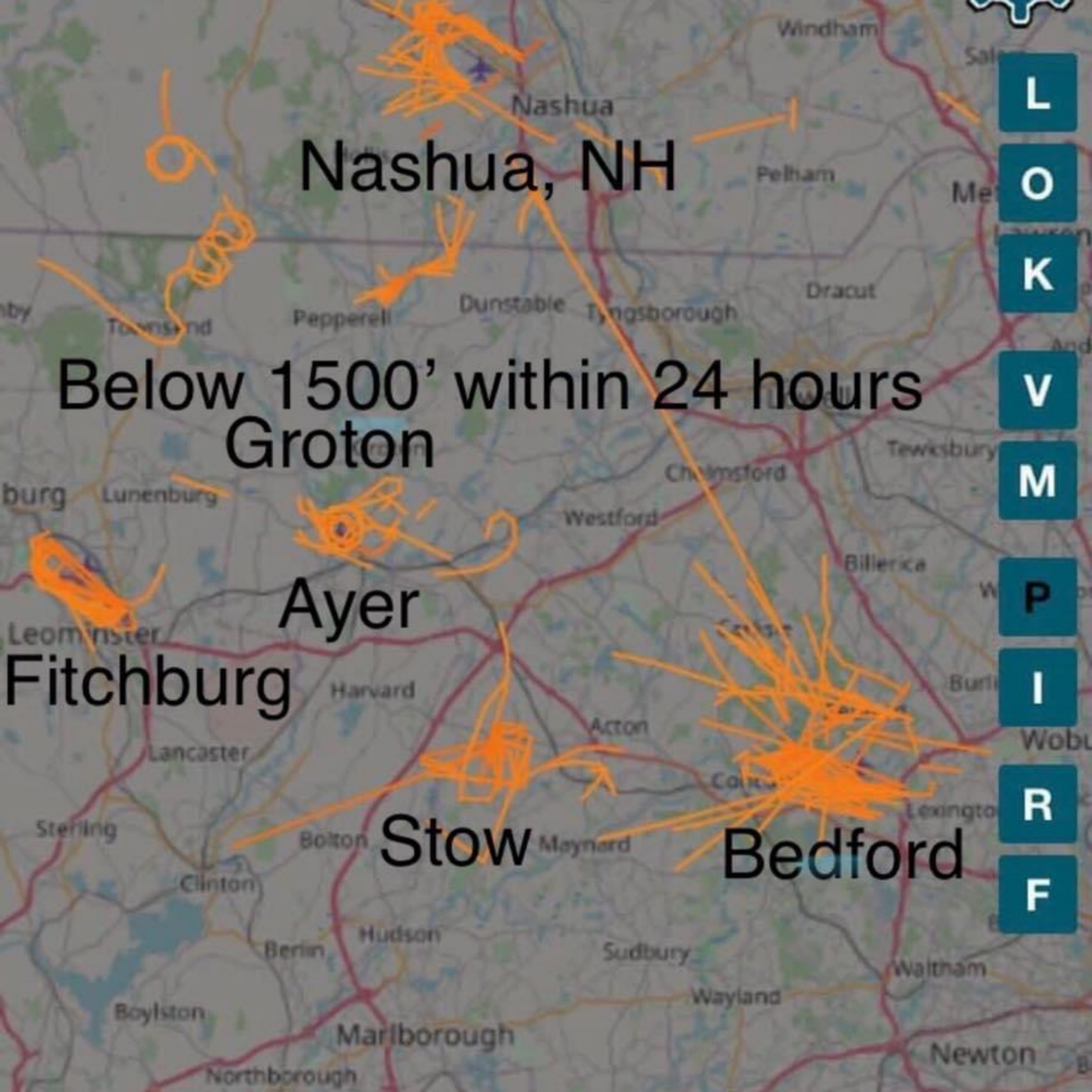
- A "through the fence" agreement between Massport and a private developer is a backhanded way to potentially increase use at the airfield without public disclosure. This type of agreement should make alarm bells go off!

I appreciate your time spent reviewing these comments.

Best regards,  
Amy McCoy  
978-772-9281

-





Nashua, NH

Below 1500' within 24 hours  
Groton

Ayer

Fitchburg

Stow

Bedford

- L
- O
- K
- V
- M
- P
- I
- R
- F

Groton

P8910



Forge Village

Ayer

Devens

Littleton

Harvard

Act

Lancaster

West Conco

Bolton

Stow

Maynard



EQUIPMENT

SW4 (N567TR)

AIRCRAFT

Fairchild Swearingen  
Metroliner

CALIBRATED  
ALTITUDE

3,600 ft

GROUND  
SPEED

231 mph

VERTICAL  
SPEED

-618 fpm

TRACK

77°

Sat, Apr 9, 2022 17:16 UTC



✈️ 13 mph

✈️ N335CA  
175 mph

Nashua

Lawrence

Lowell

Groton



Devens

Pinehurst

✈️ N420FG 30 mph  
✈️ N321MS 148 mph

West Concord



Clinton

Cambridge



Marlborough

**N321MS**  
Private owner

N284JB  
394 mph



**ITH**  
ITHACA



**BED**  
BEDFORD

Departed 0:46 ago

Arrived 0:00 ago

CALIBRATED ALT.  
204 ft  
GROUND SPEED  
148 mph

Hawker 800XP

REG: N321MS

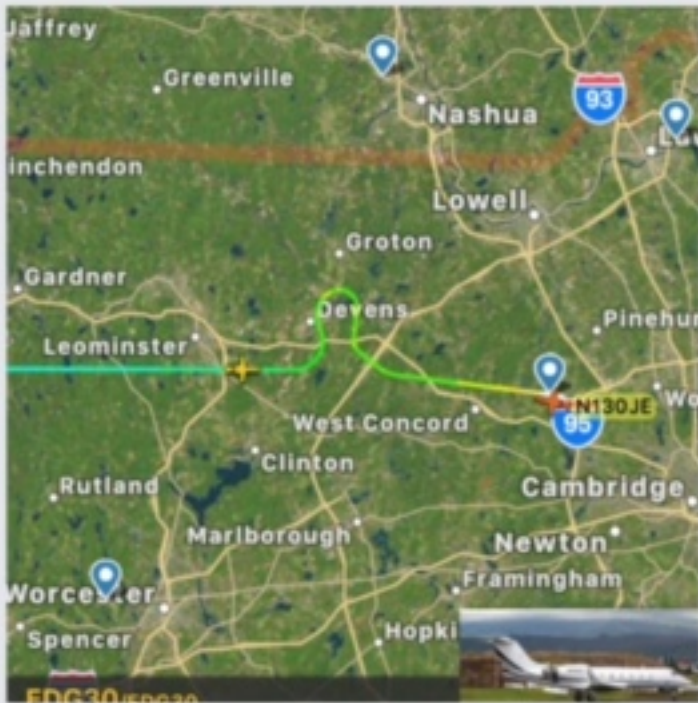
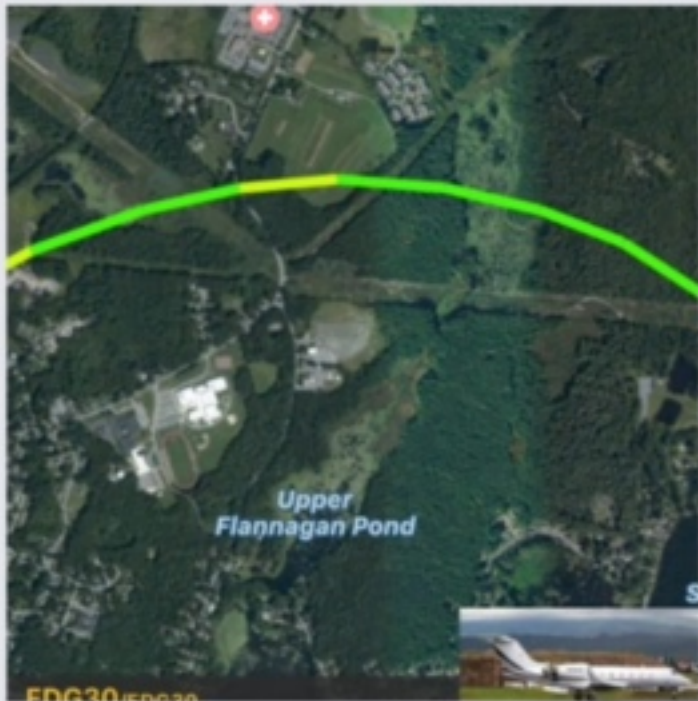
3D view

Route

More info

Follow

Share

**FOREIGN LEGAL NAME:**

**FICTITIOUS NAME:**

**ENTITY TYPE:** FOREIGN LIMITED LIABILITY COMPANY

**DURATION DATE/LATEST DATE OF DISSOLUTION:**

**SECTION OF LAW:** 802 LLC - LIMITED LIABILITY COMPANY LAW

**ENTITY STATUS:** ACTIVE

**DATE OF INITIAL DOS FILING:** 02/03/2016

**REASON FOR STATUS:**

**EFFECTIVE DATE INITIAL FILING:** 02/03/2016

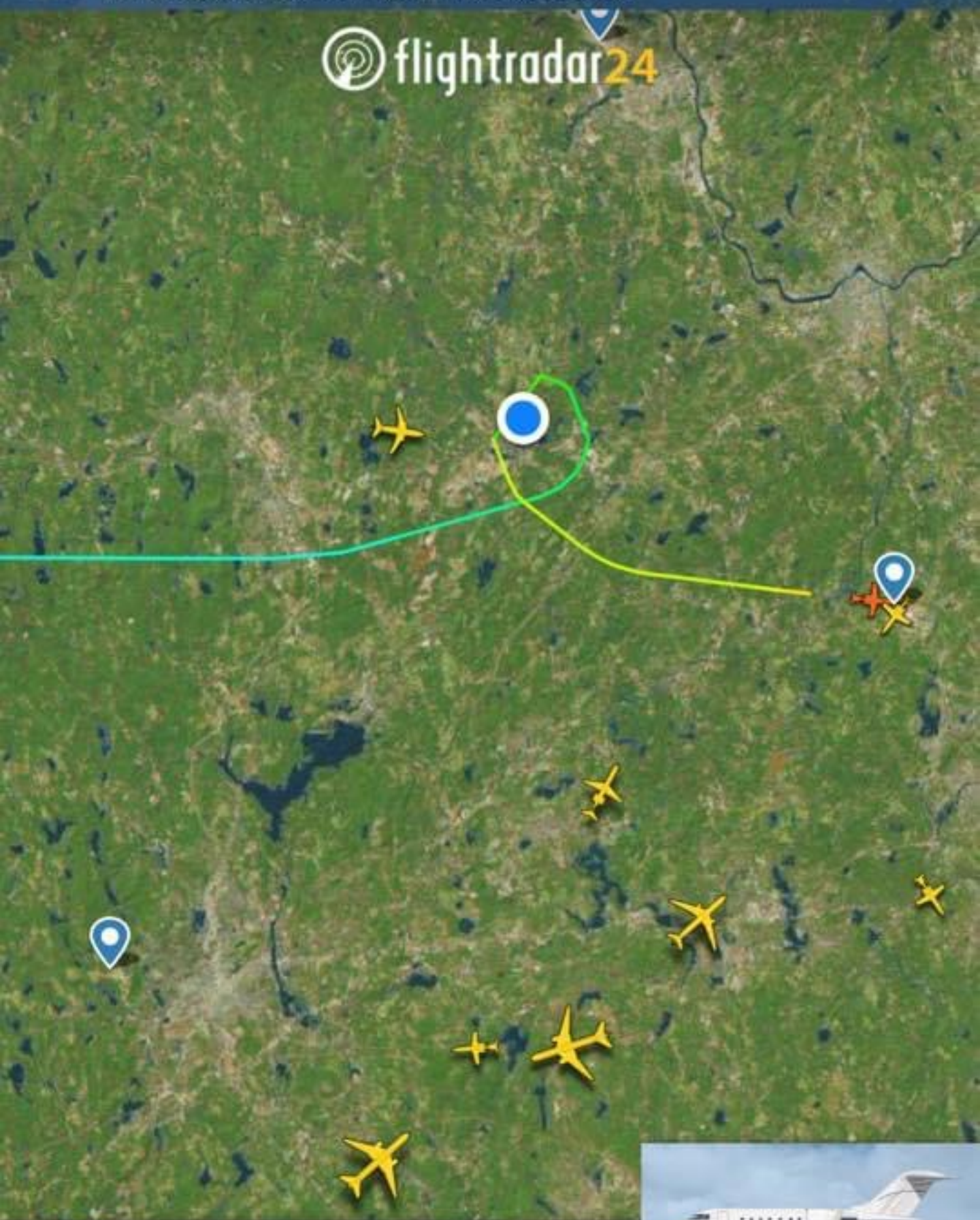
**INACTIVE DATE:**



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CL60

N/A



N/A



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CALIBRATED ALT. 298 ft  
GROUND SPEED 123 kts

Bombardier CL604 Challenger

REG: N/A



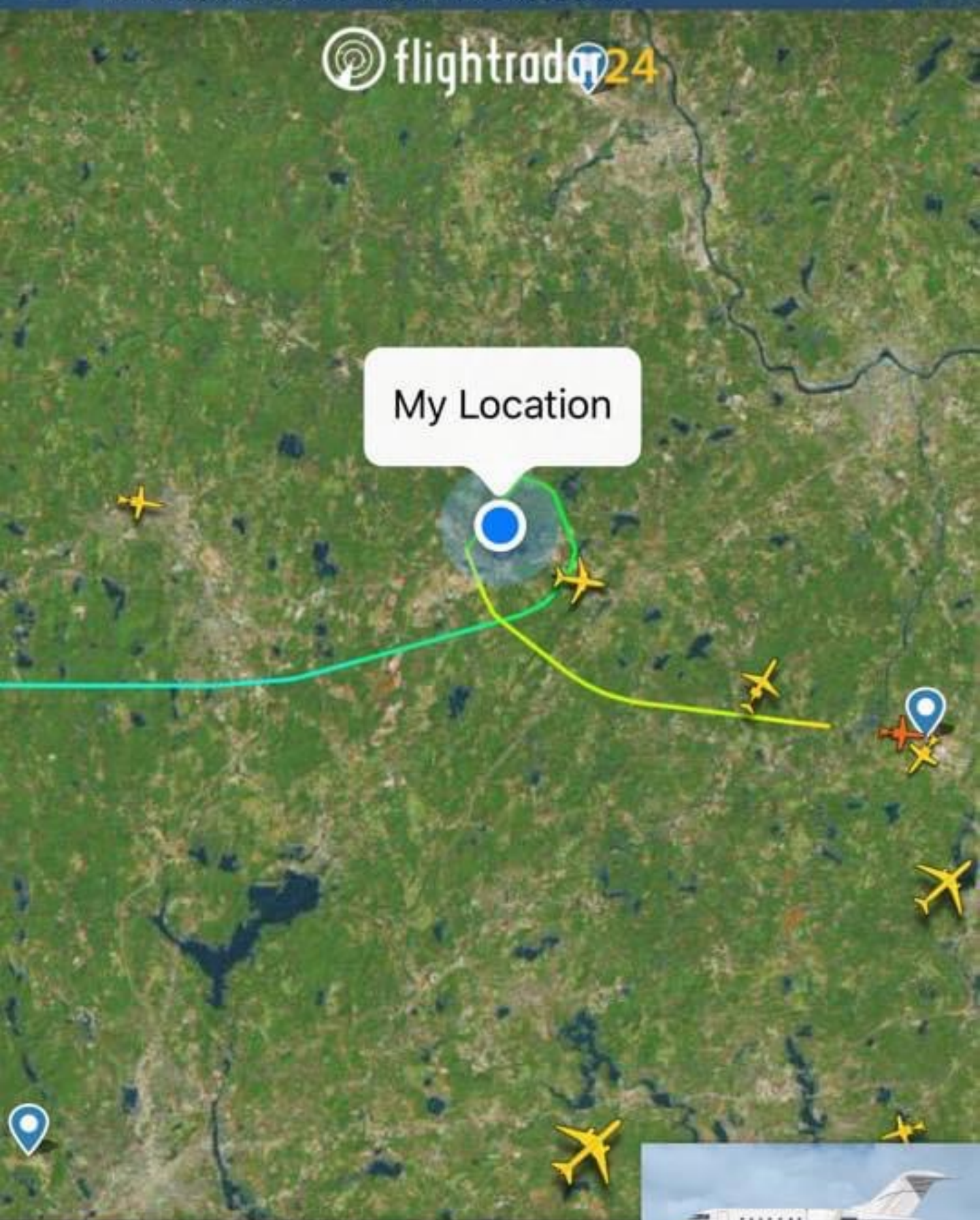




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My Location



CL60

N/A



N/A



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CALIBRATED ALT. 298 ft  
GROUND SPEED 123 kts

Bombardier CL604 Challenger

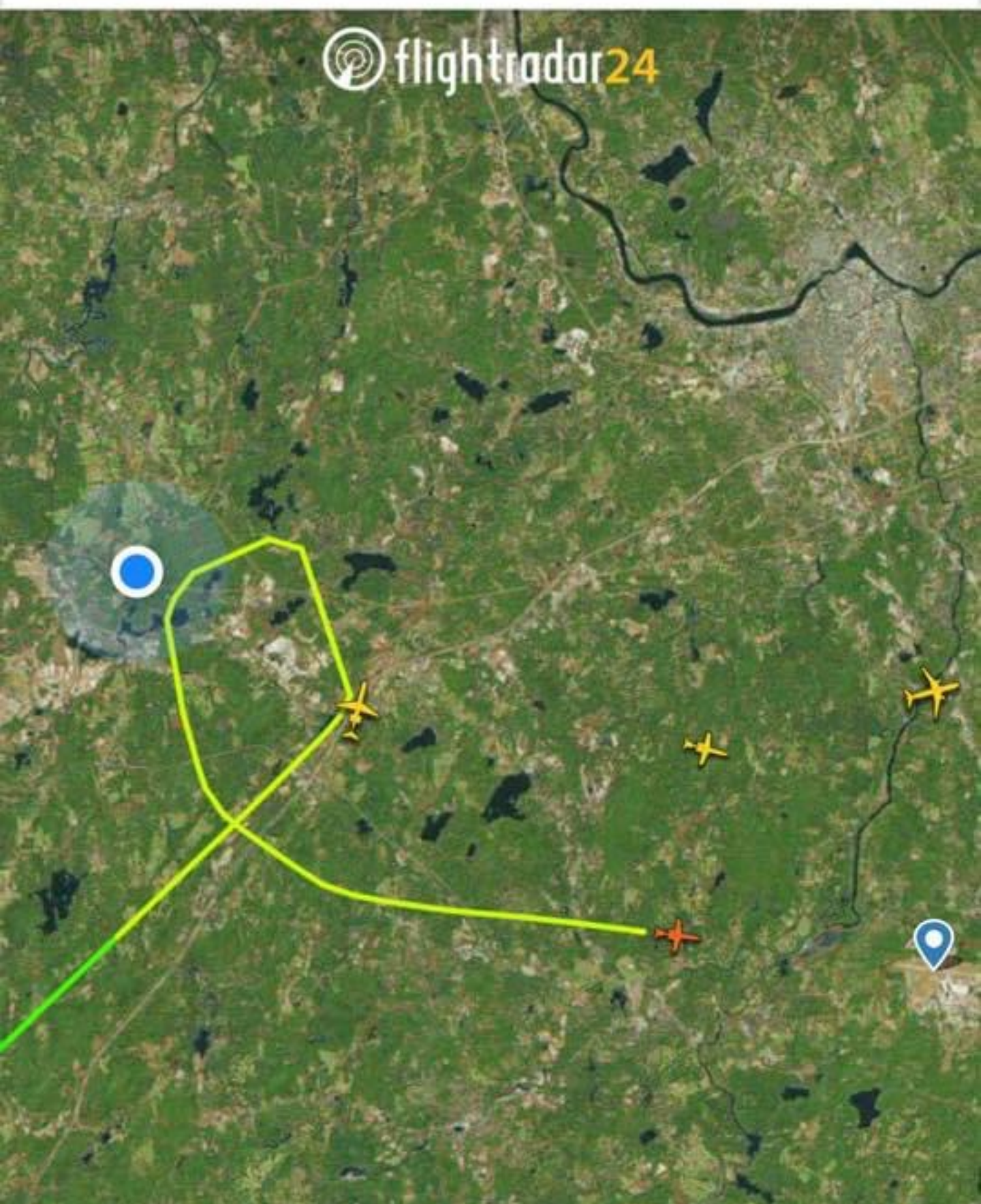
REG: N/A



# Drive with Lyft



## flightradar24



**GALX**

N/A



N/A

CALIBRATED ALT.  
1,017 ft  
GROUND SPEED  
148 kts

Gulfstream G200 Galaxy

REG: N/A



**From:** [Christine Damon](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [mike.barrett@masenate.gov](mailto:mike.barrett@masenate.gov)  
**Subject:** What is the anticipated % of private jet usage of this proposed development?  
**Date:** Monday, February 6, 2023 7:39:18 PM

---

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To the MEPA review board,

I have a number of concerns regarding the proposed Hanscom expansion.

1. I would like to know how this proposed project is consistent with the US aim to cut all carbon pollution by 2035?
2. Furthermore, specifically, I would like to know what % of the use of this proposed development will be private jets?

I am very, very concerned about the environmental impact of private jet usage in the US, in the world and at Hanscom Airforce Base.

<https://www.buzzfeednews.com/article/lesliefinlay/how-celebrity-private-jet-emissions-affect-environment>

<https://www.washingtonpost.com/climate-environment/2022/08/02/taylor-swift-kylie-jenner-private-jet-emissions/>

I believe as communities and as a nation, we should work to limit and if possible, eliminate private jet usage. I certainly have no plans to roll over and allow this project to further negatively affect our communities, our nation and my family.

Christine Damon  
2 B North Commons  
Battle Road Farm  
Lincoln, MA 01773  
781-879-5870

**From:** [Lincoln Management](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654 North Airfield/Massport  
**Date:** Monday, February 6, 2023 11:04:23 AM

---

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Dear Mr. Strysky,

The new airfield development news at Hanscom Field came conveniently after your ESPR public commenting period. Private jet traffic from Hanscom field impacts all of us living under established arrival (and departure routes). MA communities not considered “airport communities” were given no representation in the process that established Hanscom routes, so I thank you for this opportunity to comment.

The article headline below sums up my comment. Airports have no power to regulate the number of aircraft landing at Hansom Filed, and so this expansion “sparks regional concerns” for me.

<https://www.thebedfordcitizen.org/2023/02/proposed-hangar-project-sparks-regional-concerns/>

I have heard no news reports about this project on WBZ radio – I am a regular listener.

Thank you.  
David Eliades  
Ayer, MA

**ExchangeDefender** Message Security: [Check Authenticity](#)

**From:** [j.m](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Comment for North Airfield EEA #16654  
**Date:** Monday, February 6, 2023 7:20:19 AM

---

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Dear Mr. Strysky,

I would not have expected to be reaching out to your office so soon after my December comment regarding the upcoming Hanscom ESPR.

The proposed North Airfield project feels like it has been sprung upon us. If not for your email announcing the walk through - I would not have been informed about the proposal. Newspapers with a larger reach should have been contacted; Boston Globe, Boston Herald. There was no outreach to WBZ radio and local news stations to my knowledge. Hanscom Field has a large impact on the Commonwealth. Abutting communities are negatively impacted by ground noise, air noise, traffic, lead and other emissions. Communities under the jets paths - arrivals and departures are plagued by noise and emissions. Carlson Orchards in Harvard sees jet after jet after jet over their lovely location. Very sad.

Now I learn that Massport is partnering with a private developer to expand? Right away this sends up red flags. What does this project do to improve transportation and infrastructure for the average MA resident. With Magellan Jets recent announcement in the Boston Globe of \$7000 ticket prices, it's plain to see that this project only supports a very small group of MA citizens. How does this project align with Governor Healy's new climate initiatives?

Massport is not an economic engine. It loses money annually and is seeking a private partner that will allow it to increase traffic without public disclosure by using a "through the fence" agreement.

Thank you for evaluating my concerns.

Jen Murray

**From:** [Leslie Brooks](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Bill Freitas](#)  
**Subject:** We Vote "NO" EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 6, 2023 9:36:59 PM  
**Attachments:** [FSOH-NorthAirfieldDev-Alert-final\\_1-31-23.pdf](#)

---

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Dear Alexander Strysky, <[alexander.strycky@mass.gov](mailto:alexander.strycky@mass.gov)>

Thank you for the opportunity to offer our feedback on the Proposed Hanscom field north Development.

*Please help us STOP this expansion proposal.*

**First**, we hope that these emails will be seriously considered, and not casually tossed aside to fulfill the required “Public Comment period.”

As a member of Mass. Government, you must know Mr. Strysky that those of us not directly involved in this development are at an immediate disadvantage, because already significant funds have been devoted to the planning and implementation of this project, and our feedback cannot stack up as high as the large sums of money and people in positions of authority who are pushing this expansion forward. So...Please let us know if this project can be STOPPED or DENIED.

**Second**, we want to thank all of those involved over the years in trying to **Balance progress** and the **safekeeping our natural environment**, which Developers forget is the basis of all of our health and well-being.

"Hanscom-area residents and their elected town and state representatives have worked diligently to balance the needs of the airport with the need to protect these irreplaceable resources and the surrounding neighborhoods from the adverse effect of continuous expansion of the airport."

**Third**, the Developers' point here makes no sense. More planes being stored at Hanscom means more planes in the air. **No one purchases a \$30 million airplane just to store it.**

The developers purport that their 500,000 sq ft of proposed hangar infrastructure is environmentally beneficial as it will reduce the number of “ferry flights”. Their ENF states: “Currently, aircraft fly in and out empty to pick up and drop off aircraft operators who cannot secure aircraft storage space at Hanscom, as well as employees of Massachusetts-based companies located in close proximity to the Airport. This practice results in extra flights (referred to as ‘ferry flights’) that would otherwise not be required with aircraft stored at Hanscom.”

This assertion is made with no supporting data, and it flies in the face of experience which suggests that the ferry flight operations will continue – overlaid onto the additional operations that aircraft

activity from the new hangar space will generate.

**Finally**, we have lived in Lincoln now for over 15 years and the only frustration and disappointment we have experienced during this time, is the noise and disruption living near Hanscom field. We look forward to our M.M. Park outdoor time, but unfortunately there are times when the planes fill the air with jet fuel fumes. This has been a continual discomfort -- literally you have to stay indoors because of the air-saturated fumes and screaming jets so loud we that we can not even talk to one another.

**In summary**, cementing another approx. 50-60 acres of land and increasing noise and fumes, for all of us 40,000 citizens in Bedford, Concord and Lincoln area, to benefit a handful of luxury jet owners, is completely unjust and unfair. Please inform us how best to stop this expansion.

**Our vote is to not only push back on this project but decrease air traffic at Hanscom Field.  
Please be sure our voice is heard. Thank you.**

—concerned citizens from Lincoln,  
Kingsley & Leslie Brooks  
Lincoln, Mass 01773

End

### **Increased ground traffic, impervious surfaces, water use, wastewater**

The proposed [North Airfield development](#) would also add:

- 194 vehicle trips/day, a change from zero
- 23.9 acres of new impervious area, a change from 15.1 acres
- Massport pays no taxes to its four Hanscom-area host towns: Bedford, Concord, Lexington and Lincoln.
- There are no taxes on private business and luxury jets.

*Dear Friends of Save Our Heritage,*

Plans for a proposed massive development at Hanscom for the North Airfield area near Hartwell Road have recently come to light when developers submitted details of their plans to MEPA in an ENF (Environmental Notification Form).

***The proposed development includes --***

- adding nearly 500,000 sq ft of hangar space on almost 50 acres of land to house and accommodate aircraft operators that wish to use Hanscom as their base
- building an additional taxiway
- building an additional service road
- reconfiguring Taxiway Romeo to support larger, heavier aircraft
- a Land Swap & Access Agreement between Runway Realty Ventures (the private owner of the former Navy parcel) and Massport

**For the fuller story, please read the ATTACHED pdf.\***

**Then, please consider taking the time-sensitive actions below.**

*\*If you have trouble opening hyperlinks in the attached pdf, click Control, then the link, or*

*click on the active links in the list below.*

**MEPA is providing three opportunities for public comment and information.**

***ACTIONS – time-sensitive:***

**1. Monday, 2/6/23 (two meetings):**

**a. 3:00 pm: in-person site visit, accessed off Hartwell Road,**

across from Edge Sports Center, [191 Hartwell Rd.](#) Bedford,  
and

**b. 6:30 pm: remote consultation session via this Zoom link:**

<https://vhb.zoom.us/j/84330574548?>



[pwd=eThiOXY3a05YQWRzcGphKzZ0aFpYZz09](mailto:alexander.stryzky@mass.gov)

**2. Public Comment period, ends on Tues, 2/14/23.**

Comments may be submitted  
to [alexander.stryzky@mass.gov](mailto:alexander.stryzky@mass.gov) or  
via the [MEPA Public Comments Portal](#).

In the subject line of your Comment, write this reference:

“ RE: EEA #16654: L.G. Hanscom Field North Airfield  
Development ENF “

*Note: We just received word about the 2 MEPA meetings yesterday.*

***For further information –***

**Links to Documents related to the proposed North Airfield  
Development:**

- **[ENF \(Environmental Notification Form\) on Proposed North Airfield Development](#)**

Posted by MEPA on 1/25/23

- **[Massport Board Meeting Presentation on Proposed Land Swap and](#)**

**[Access Agreement, 10/20/22](#)** , pp 45-53

- **[Massport Board Meeting Minutes, 10/20/22, Proposed Terms of Land Swap & Access Agreement](#)**, pp. 9-15

- [FAA Notice re: Land Swap in Federal Register, 12/15/22](#)

## **Proposed massive development at Hanscom – is this what our towns want?**

Plans for a massive build-out at Hanscom Field civil airport were recently submitted by private developers to MEPA (MA Environmental Policy Act) as part of state requirements, with potentially major implications for the four Hanscom-area host communities, Bedford, Concord, Lexington and Lincoln.

The proposed development would **add nearly 500,000 square feet of hangar space on almost 50 acres of land**, equivalent to eight football fields.

Construction would take place on two adjacent properties near Hartwell Road:

- 1) the North Airfield area, owned by Massport, and to its east,
- 2) the former Naval hangar parcel, which was acquired by Runway Realty Ventures, LLC, through a government public auction, 2018-2019.

Runway Realty Ventures, LLC (RRV), owner of the Naval parcel, and Massport's developer, North Airfield Ventures, LLC (NAV), filed a joint ENF (Environmental Notification Form), detailing the developers' plans. The ENF was posted on MEPA's website on 1/25/23.

MEPA is providing three opportunities for public comment and information:

- **Monday, 2/6/23 (two events):**
  - **3:00 pm: in-person site visit, accessed off Hartwell Road, and**
  - **6:30 pm: remote consultation session at 6:30pm via Zoom.**
  
- **Public Comment period ending on 2/14/23**

*(See end of this article for details on how to participate in all three.)*

### **Construction of new, larger hangars**

According to the [North Airfield Development ENF](#), the combined development of Massport's North Airfield and Runway Realty Venture's Navy parcel will provide "approximately 495,470 square feet of hangar space in the form of 27 purpose-built hangars for aircraft parking and storage on-airport. Renovation of the existing Navy Hangar building will comprise 87,110 sf of this total, resulting in 408,360 sf of new building area."

For context, this extensive development project would essentially double the combined infrastructure of the three current Hanscom FBOs (Fixed Base Operators, i.e., aircraft fuel and service stations), even with the removal of older, smaller hangars taken into account. FBOs attract aircraft activity. While the North Airfield project is not explicitly identified as an FBO, it would provide services generally associated with FBOs, such as hangar space, storage, aircraft maintenance – and the sale of aviation fuel (for "self-fueling").

### **Increased ground traffic, impervious surfaces, water use, wastewater**

The proposed [North Airfield development](#) would also add:

- 194 vehicle trips/day, a change from zero
- 23.9 acres of new impervious area, a change from 15.1 acres

- 13,500 gals of water per day, a change from zero
- 12,150 wastewater generation/treatment, a change from zero

**Land Swap and Access Agreement**

Central to the proposed 47-acre development is a Land Swap and Access Agreement between Massport and Runway Realty Ventures, LLC (RRV). The Land Swap would transfer:

- Two parcels of land totaling about 5.2 acres, from Massport to RRV
- Approximately 2.6 acres of land, from RRV to Massport

**Construction of an additional vehicle service road**

Because the value of Massport’s parcels exceeds the value of RRV’s parcel by \$930,000, RRV will be expected to contribute that amount toward the cost of a new vehicle service road on a portion of the periphery of Hanscom Field (the “VSR Project”), and assume all responsibility for its construction.

**Construction of an additional taxi lane**

The related Access Agreement, also called a through-the-fence (TTF) agreement, would permit “RRV and aircraft owned and leased by its tenants to taxi their aircraft from the former Navy parcel ‘through-the-fence’ to Hanscom Field” and would allow RRV to construct a taxi lane connecting the former Navy parcel with Hanscom Field via Taxiway Romeo, which is immediately adjacent to RRV’s property to the south.

**Reconfiguring Taxiway Romeo to support larger and heavier aircraft**

According to the [Land Swap Terms](#) “Taxiway Romeo currently supports up to design Group III aircraft with weight limits of up to 100,000 pounds.” Of concern, at RRV’s request, the Land Swap agreement *would allow RRV to fund and upgrade Taxiway Romeo to support not only the current Design Group III aircraft but larger and heavier Design Group IV aircraft in the future.*

[Differences between FAA Design Group III and IV Aircraft](#)

FAA Aircraft Category	Wingspan	Tail Height	Typical Weight	Length
Design Group III	79 ft - < 118 ft	30 ft - < 45 ft	Up to 100,000 lbs	n/a
Design Group IV	118 ft - < 171 ft	45 ft - < 60 ft	100,000 lbs - plus	n/a
Design Group III <b>EXS:</b> - Challenger 300 - Gulfstream V (G-V)	63.84 ft 93 ft 3 in	20.33 ft 25.8 ft	Below 100,000 lbs	68.63 ft 96 ft 5 in
Design Group IV <b>EXS:</b> - Boeing 707-320 - Airbus A310-200	142 ft 144 ft	42.2 ft 52.3 ft	Above 100,000 lbs	152.9 ft 153.2 ft

Source for weight data: [Massport Board Meeting Minutes, 10/20/22, pp. 9-15](#)

The developers purport that their 500,000 sq ft of proposed hangar infrastructure is environmentally beneficial as it will reduce the number of “ferry flights”. [Their ENF states:](#) “Currently, aircraft fly in and out empty to pick up and drop off aircraft operators who cannot secure aircraft storage space at Hanscom, as well as employees of Massachusetts-based companies located in close proximity to the Airport. This practice results in extra flights (referred to as ‘ferry flights’) that would otherwise not be required with aircraft stored at Hanscom.”

This assertion is made with no supporting data, and it flies in the face of experience which suggests that the ferry flight operations will continue – overlaid onto the additional operations that aircraft activity from the new hangar space will generate.

The proposed development may have far-reaching effects, given that Hanscom Field civil airport is located adjacent to Minute Man National Historical Park, near Great Meadows National Wildlife Refuge, and is surrounded by thousands of historic sites in four that millions of people visit every year to experience living history and the peace of the natural world. For decades, Hanscom-area residents and their elected town and state representatives have worked diligently to balance the needs of the airport with the need to protect these irreplaceable resources and the surrounding neighborhoods from the adverse effect of continuous expansion of the airport.

Given the magnitude of the proposed development and its potential impacts, Hanscom-area community members are urged to become informed and raise their questions and concerns.

**Below you will find:**

- **How to submit comments to MEPA & join the two 2/6/23 MEPA meetings**
- **Links to Documents related to the proposed North Airfield Development**
- **Facts about Hanscom Field**

**How to submit comments to MEPA & join the two 2/6/23 MEPA meetings:**

- **Public Comment period, ends on Tues, 2/14/23.**

Comments may be submitted to MEPA contact: [alexander.strysky@mass.gov](mailto:alexander.strysky@mass.gov) or via the [MEPA Public Comments Portal](#).

Note: Please include this reference in the subject line of your Comment:  
“RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF”  
and include your name and address.

- **Monday, 2/6/23** (two meetings):

**3:00 pm: in-person site visit, accessed off Hartwell Road,**  
across from Edge Sports Center, 191 Hartwell Rd. Bedford, and

**6:30 pm: remote consultation session via this Zoom link:**

<https://vhb.zoom.us/j/84330574548?pwd=eThiOXY3a05YQWRzcGphKzZ0aFpYZz09>

*Continued next page*

### **Links to Documents related to the proposed North Airfield Development:**

- **ENF (Environmental Notification Form) on Proposed North Airfield Development**  
Submitted to MEPA by North Airfield Ventures LLC & Runway Realty Ventures LLC
- **Massport Board Meeting presentation on Proposed Land Swap and Access Agreement, 10/20/22** , pp 45-53
- **Massport Board Meeting Minutes, 10/20/22, Proposed Terms of Land Swap & Access Agreement**, pp. 9-15
- **FAA Notice re: Land Swap in Federal Register, 12/15/22**

### **Facts about Hanscom Field:**

- Though they share the same name, Hanscom Civil Airport (Hanscom Field) is owned by Massport and is distinct from Hanscom Air Force Base (HAFB) – which has no runway nor any aviation activity. Rare military flights use Massport’s runway at the civil airport.
- Hanscom is the second busiest airport in New England, and a reliever for Logan Airport.
- In addition to Hanscom Field, Massport also owns Logan and Worcester Airports.
- Massport pays no taxes to its four Hanscom-area host towns: Bedford, Concord, Lexington and Lincoln.
- There are no taxes on private business and luxury jets.

end

**From:** [Mark Hanson](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Opposed to Hanscom expansion proposal by Runway Realty Ventures and North Airfield Ventures  
**Date:** Monday, February 6, 2023 3:52:48 AM

---

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I live in Concord. I object to this proposal.

I understand that the proposed plan will quadruple the number of parking spaces — presumably for those who will be flying aircraft in/out of Hanscom. According to the MEPA report 175 new spaces will be added to 65 existing parking spaces to make a total of 240 nearly 4x the current total of 65.

This combined with the construction of 27 new hangers will likely result in quadruple the amount of noise from aircraft operations. The noise from aircraft is already a problem in our neighborhood. We have in the past called the noise complaint line.

In our neighborhood we have a community garden near the Sudbury river. Currently when an aircraft passes overhead the noise is so intense that it interrupts normal conversation between gardeners. The thought of 4 times as much noise will be a serious problem for us working in the garden from March through November. The garden is a delight to all ages. Don't kill it with noise from people joyriding in their aircraft.













Please don't make this problem 4x worse;

I should also mention that aircraft noise is particularly annoying to groups using the picnic tables we have at the gardens. We have typically groups of 15 to 20 people from our neighborhood and guests at these picnics.

I will appreciate your turning town this proposal from Runway Realty Ventures and North Airfield Ventures,  
Mark Hanson  
Concord

-- from the MEPA office:

" The project will

- alter 23.2 acres of land
- add 23.9 acres of impervious area
- construct **175 New parking spaces for a total of 240 spaces** including existing spaces
- generate 194 average daily vehicle trips
- use 13,500 gallons per day (gpd) of water
- generate 12,150 gpd of wastewater.

The project site is located within an Environmental Justice population designated as Minority and within a mile of additional EJ populations."

**From:** [Robert mcclatchey](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Wetland Concern  
**Date:** Monday, February 6, 2023 9:14:51 PM  
**Attachments:** [Screenshot \(168\).png](#)

---

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Mr. Strysky,

Tonight, at the public meeting on the North Airfield Proposed Project, I raised a question about a wetland zone (including a 200 ft wide buffer zone) located in the middle of the proposed project area. It is clearly marked on the GIS map located on the Bedfordma.gov website. Furthermore, I asked whether Bedford's Conservation Commission would have jurisdiction.

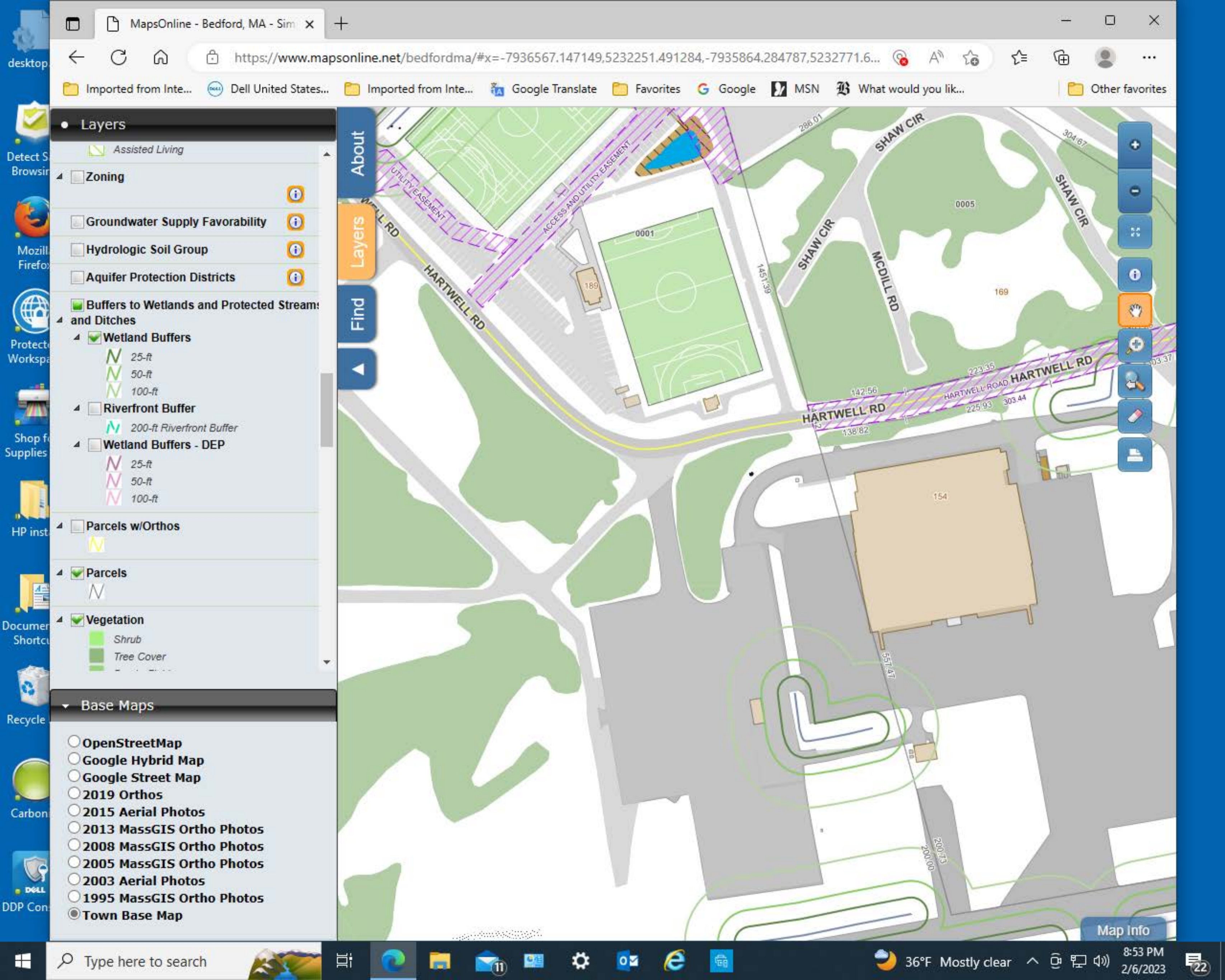
Mr. Schwartz indicated that an investigation has taken place and that there is no wetland area present. **I disagree.** I think it's important that this question receive further investigation. What maps were used to determine that there is no wetland? If there are maps showing a different outcome, someone must determine which maps are correct.

It was also stated that the Bedford Conservation Commission would not be able to weigh in. Why would this be? The land in question is in the Town of Bedford where our Conservation Commission has jurisdiction.

I am attaching a screen shot of the GIS map on the Bedfordma.gov website which shows the wetland area in question. The L-shaped blue line represents the wetland; the blue closed area represents the 25 ft buffer zone; the green closed area represents the 50 ft buffer zone; and the light green closed area represents the 100 ft buffer zone.

Thanks,

Robert A. McClatchey

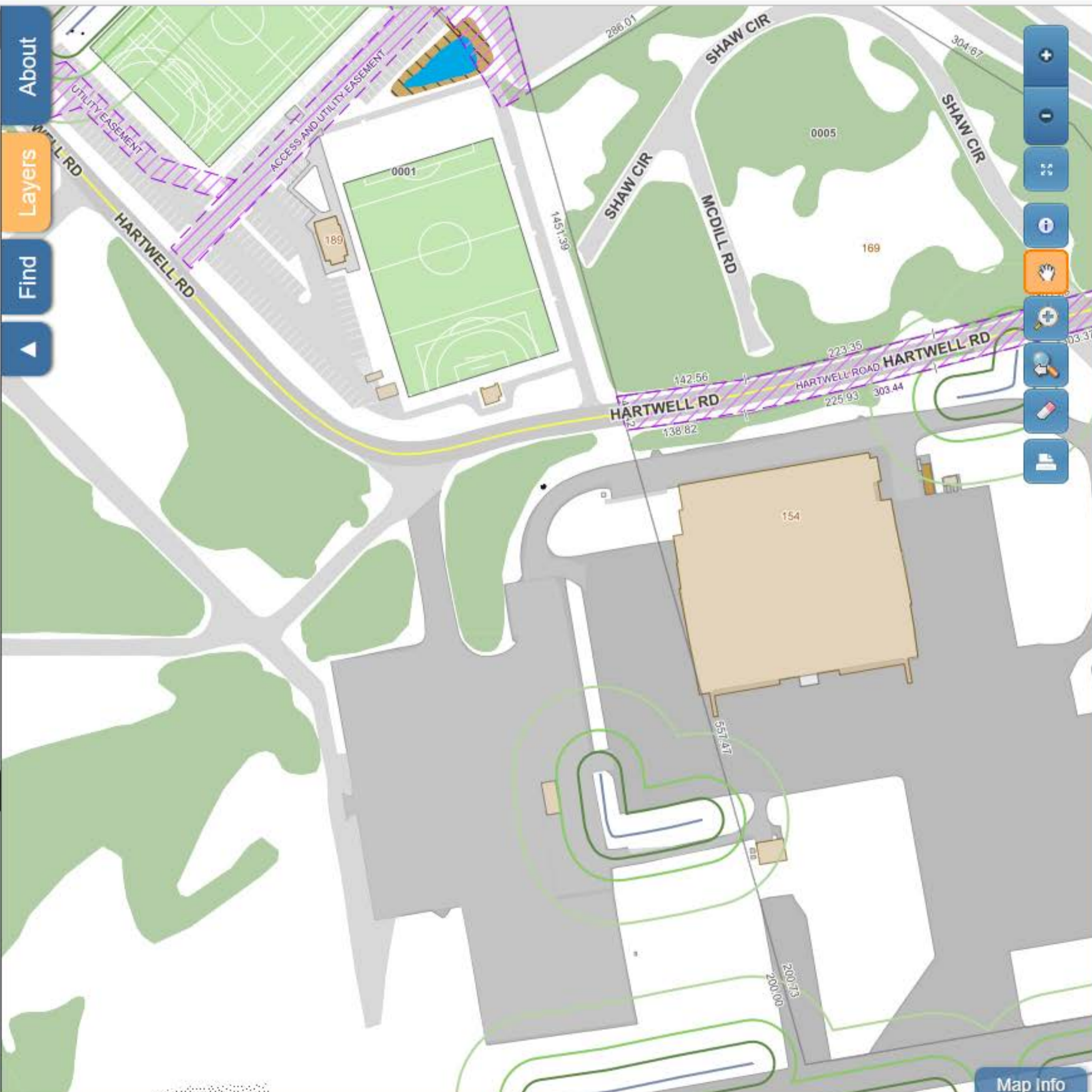


**Layers**

- Assisted Living
- Zoning
- Groundwater Supply Favorability
- Hydrologic Soil Group
- Aquifer Protection Districts
- Buffers to Wetlands and Protected Streams and Ditches
  - Wetland Buffers
    - 25-ft
    - 50-ft
    - 100-ft
  - Riverfront Buffer
    - 200-ft Riverfront Buffer
  - Wetland Buffers - DEP
    - 25-ft
    - 50-ft
    - 100-ft
- Parcels w/Orthos
- Parcels
- Vegetation
  - Shrub
  - Tree Cover

**Base Maps**

- OpenStreetMap
- Google Hybrid Map
- Google Street Map
- 2019 Orthos
- 2015 Aerial Photos
- 2013 MassGIS Ortho Photos
- 2008 MassGIS Ortho Photos
- 2005 MassGIS Ortho Photos
- 2003 Aerial Photos
- 1995 MassGIS Ortho Photos
- Town Base Map



**From:** [haslett.tom@gmail.com](mailto:haslett.tom@gmail.com)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hi Alex - Hoping you can get answers to my questions that I put into the Q/A this evening.  
**Date:** Monday, February 6, 2023 7:33:12 PM

---

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Who owns the Navy Parcel - how long has this been held and what is the tax payment for this land?

D) Has there been a soils review to understand toxins in the ground?

E) Increase privacy? Who are the parties that need privacy?

F) Fixed Space Services: three companies and their growth (from this 500,000 sq foot expansion) will generate how much more traffic in and out of the air-field? Could you 'net' this v. the 'ferry flight' savings? Net - what are emissions overall when this capacity is operational?

G) "Customers on wait list...". Who are these customers: beyond the three named 'fixed service providers'? Are these customers corporations, individuals?

H) Demand of who???? The demands of three companies, the demand of ##### corporations, the demand of ### wealthy individuals - who?

I). Historic Building - who cares about this building from 1959? Is there any genuine historical significance to the structure? "Required to preserve the structure" - what have we been waiting for????

J) 27 purpose built hangers: how many jets in each hanger? This links to the capacity increasing overall activity - and the impacts??

L) Impervious area 24 acres - drains to where? Infiltration into whose water table?

M) If you are looking for public relations points - why aren't you going for platinum LEED?

N) Local traffic will be increased by how much as the new hanger facilities are brought on line?

O) Living History: is this the history of the air-base? Will this include the

Tom Haslett  
+1 617 943 8301



**From:** [rvlemire@verizon.net](mailto:rvlemire@verizon.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 6, 2023 11:40:36 AM

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I write in opposition to Hansom Expansion.

1. The things you claim to need at Hanscom can be provided by Worcester Airport.
2. This expansion will increase greatly the number of flights over a National Wildlife Refuge, a National Park and other preserved lands.
3. This is a private development for the benefit of private jets. Why should these rich people and their companies be allowed to make a negative impact on the ordinary citizen?
4. There will be no taxes paid to any of the surrounding towns, either for the additional building and private jets that use the new building, for the huge impact they will have to their quality of life?
5. The impact of additional auto traffic will have a large impact on current roads and highways.
6. The additional water and sewage will also put a strain on local resources.
7. You have no supporting data that ferry flights will decrease.

Hanscom is already the second largest airport in area. PLEASE don't make it larger.

Virginia Lemire  
1 Harvest Circle  
Lincoln, Mass 01773

**From:** [Jarrell, Brenda](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Subject:** Please do not expand Hanscom airport  
**Date:** Tuesday, February 7, 2023 8:49:12 AM

---

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In this time of environmental crisis, the last thing we need to do is to encourage commuter flights. Can we not invest in better rail service or other strategies for short-distance travel?

Maybe you already have the information, but it seems to me that a survey of fliers to understand why they prefer air travel to train might be helpful. Maybe it is schedule/frequency of routes = can invest in/adjust train options. Maybe it's the ability to bring pets etc = can consider "reserved cabin" options on trains?

Thank you

Brenda Herschbach Jarrell, PhD, JD (she/her/hers)

## CHOATE

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skype: Brenda.H.Jarrell.PhD  
[bjarrell@choate.com](mailto:bjarrell@choate.com)  
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**From:** [Donald Saletnik](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** North Field Hanger Expansion Hanscom Air Field  
**Date:** Tuesday, February 7, 2023 8:57:29 AM

---

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It is sated that the buildings have a 38 year lifespan. What will happen to the site after the these buildings lifespan?  
Sent from my iPhone

**From:** [Gary Davis](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Presentation 2-7-2023  
**Date:** Tuesday, February 7, 2023 12:35:37 PM

---

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Mr. Strysky,

Thank you for organizing the site visit and on-line presentation yesterday for the public. I understand and appreciate the lawful basis for review by the public and officials representing surrounding communities. I am familiar with the reputation of VHB.

Unfortunately, I am not sure your team was prepared to understand the history of objections to projects at Hanscom from surrounding community activists, and the larger perspective they represent.

I am an abutter on the south side to both the civil air field and the USAF base, near the southerly end of runway 5/23. I live in the condominium Battle Road Farm. When we first moved here around 2004, the surrounding Towns and the civil airfield management met periodically. I attended most of those on which some of my comments below are based.

In general, I think your team could have been better prepared to understand and incorporate issues relating to conservation, environment, sensitivity of surrounding residential areas, and history of activism particularly in those categories.

Overall, given some of the public concerns mentioned last evening, the site appeared considerably overdeveloped. There was no explanation given for the feasibility basis or real need for that density. Just because the site dimensions are there, it doesn't mean that every square inch should be sacrificed.

In terms of the illustrated build out, no documentation was presented to show that level of need. For instance, there could have been more thorough rationale and documentation of current trips compared to future trips with a basis of a feasible market, i.e. how would use for parking more planes at Hanscom result in less disruption and greater fuel/energy savings?

Much of the public response regarded risk to populations threatened by proximity from noise and jet fume pollution. In meetings I attended years ago, I learned that some instrumentation was installed in communities (mostly along the Logan flight path) to measure such pollution. Those locations were too far from Hanscom to be of real use, plus there didn't seem to be any public distribution of findings.

Your team could have understood that would likely have been a serious concern among residents. Since the technology exists, a proposal could have been made to install instrumentation, to establish risk thresholds, and suggest a means for publication. Readings could give you a basis for adjusting the numbers and timing of trips to maintain a safe residential environment.

The response to the question of why the Navy Hanger was "historic" failed to understand the

extensive history of preservation efforts to preserve a WWII research lab on Hanscom civil field grounds. The presentation failed to accurately describe the process by which buildings and/or sites are found to meet historic preservation criteria.

Actually, the first thing I noticed was that the illustrations in the presentation did not include images of larger Design Group IV aircraft as documented from Massport Board Meeting Minutes from 2022. I assume the illustrations did not include aircraft of that larger size for a reason.

Thank you for the public presentation, albeit seemingly late in the process. Hopefully subsequent presentations will seriously consider public comment.

Gary Davis  
20R Indian Camp Lane  
Lincoln, MA 01773



# TOWN OF LINCOLN MASSACHUSETTS

16 LINCOLN ROAD, LINCOLN, MA 01773

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## PLANNING BOARD

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Alexander Stryisky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Stryisky@mass.gov  
(857) 408-6957

February 7, 2023

Re: Hanscom North Airfield Development ENF

Dear Mr. Stryisky:

Thank you for the opportunity to comment on the Hanscom North Airfield Development ENF.

For the past 45 years, on numerous occasions, Massport has affirmed its commitment to the 1978 Master Plan for Hanscom Field. But the Master Plan has only a few statements that can be considered absolute and unequivocal:

One of them is on p. 29 of the Master Plan. It says

**"Acquisition [of land] would be considered only in instances where it was essential to preclude major incompatible developments."**

The plan for this project proposes acquisition of land by Massport. It is clearly **not** to preclude a major incompatible development; quite the opposite - it's to facilitate airport expansion, and it's a clear violation of the 1978 Master Plan.

Many sections of the ENF questionnaire ask the proponent to address consistency with existing state, regional, and local plans and policies. However, the proponent's ENF does not even acknowledge the existence of the Master Plan.

Can Massport ignore its Master Plan whenever it chooses to do so? Or does it first need to modify the Plan through a public process, possibly overseen by the Secretary of Energy and Environmental Affairs? We trust that the MEPA office will give these questions full consideration.

Sincerely,  
Robert Domnitz  
Chair, Lincoln Planning Board

via email and USPS

**From:** [Paul Gingrich](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Paul Gingrich](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 7, 2023 9:40:24 AM

---

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RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

I am a North Lincoln resident and am writing to express my opposition to the massive development proposed for Hanscom's North Airfield.

Our family, town and state have been working hard to decarbonize by installing solar panels, heat pumps and paying close attention to energy use. It is mystifying to see MassPort move in the opposite direction by enabling a major development project that includes 27 hangars, enlarging taxi-ways and runways, and increasing the impervious surfaces.

This development only helps the developers, the commercial operators and the high net worth individuals who use the commercial flights out of Hanscom and leaves the local residents with the externalities – air pollution, noise pollution and water pollution.

I am requesting that the developers calculate the increased air and noise pollution that would result from the operation of their completed development.

Specifically

- changes in decibel levels for the residents in all towns surrounding Hanscom.
- changes in lead and particulate levels from aircraft exhaust for the residents in all towns surrounding Hanscom

The area in question should be entirely converted to woodland. The developers can be reimbursed their auction price.

Regards,

Paul Gingrich

146 Bedford Road

Lincoln, MA



**From:** [mccoy4@verizon.net](mailto:mccoy4@verizon.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654  
**Date:** Wednesday, February 8, 2023 5:54:46 PM  
**Attachments:** [cns grocers 2.2.23 keene to kbed to fl to kbed to keene.pdf](#)

---

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Dear Mr. Strysky,

This topic came up during the Monday meeting - ferry flights - and I am providing one more comment.

Here are some ferry flight examples to and from KBED (2/2 flight track is attached). C&S Grocers are from NH and their plane is housed at the airport in Keene. The North Airfield proposal will not cut down on these types of flights. How many jets go to Hanscom to pick people up and drop them off (and have no intention to move to the airfield once new hangars are available)?

<a href="#">N725CS</a>	<a href="#">Camp:S WHOLESALE GROCERS</a>	2023/02/06 07:36:39	2023/02/06 07:37:48	3675 ft MSL	1.49 mi
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<a href="#">N725CS</a>	<a href="#">Camp:S WHOLESALE GROCERS</a>	2023/02/02 17:39:09	2023/02/02 17:40:14	4000 ft MSL	1.5 mi
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<a href="#">N725CS</a>	<a href="#">Camp:S WHOLESALE GROCERS</a>	2023/02/02 07:00:36	2023/02/02 07:01:18	4375 ft MSL	0.68 mi
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Thank you,  
Amy McCoy

N725CS  
Hex: A9B662 [Copy Link](#)  
adsbexchange.com



Reg.: N725CS  
United States  
DB flags: LADD  
Type: GL5T  
2022 BOMBARDIER BD-700  
Global 5000/5500  
C&S WHOLESALE  
GROCCERS INC  
Type Desc.: L2J  
Squawk: 2102

History

UTC day:

2023-02-02

[previous](#) [next](#)

Legs: All

[previous](#) [next](#)

Time: 21:37:03 Z

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Click on the trace line to start playback!

SPATIAL

Groundspeed: 527 kt  
Baro. Altitude: ▼ 41275 ft  
WGS84 altitude: ▼ 41250 ft  
Vert. Rate: -1600 ft/min  
Track: 30.8°  
Pos.: 39.851°, -74.383°  
Distance: n/a

SIGNAL

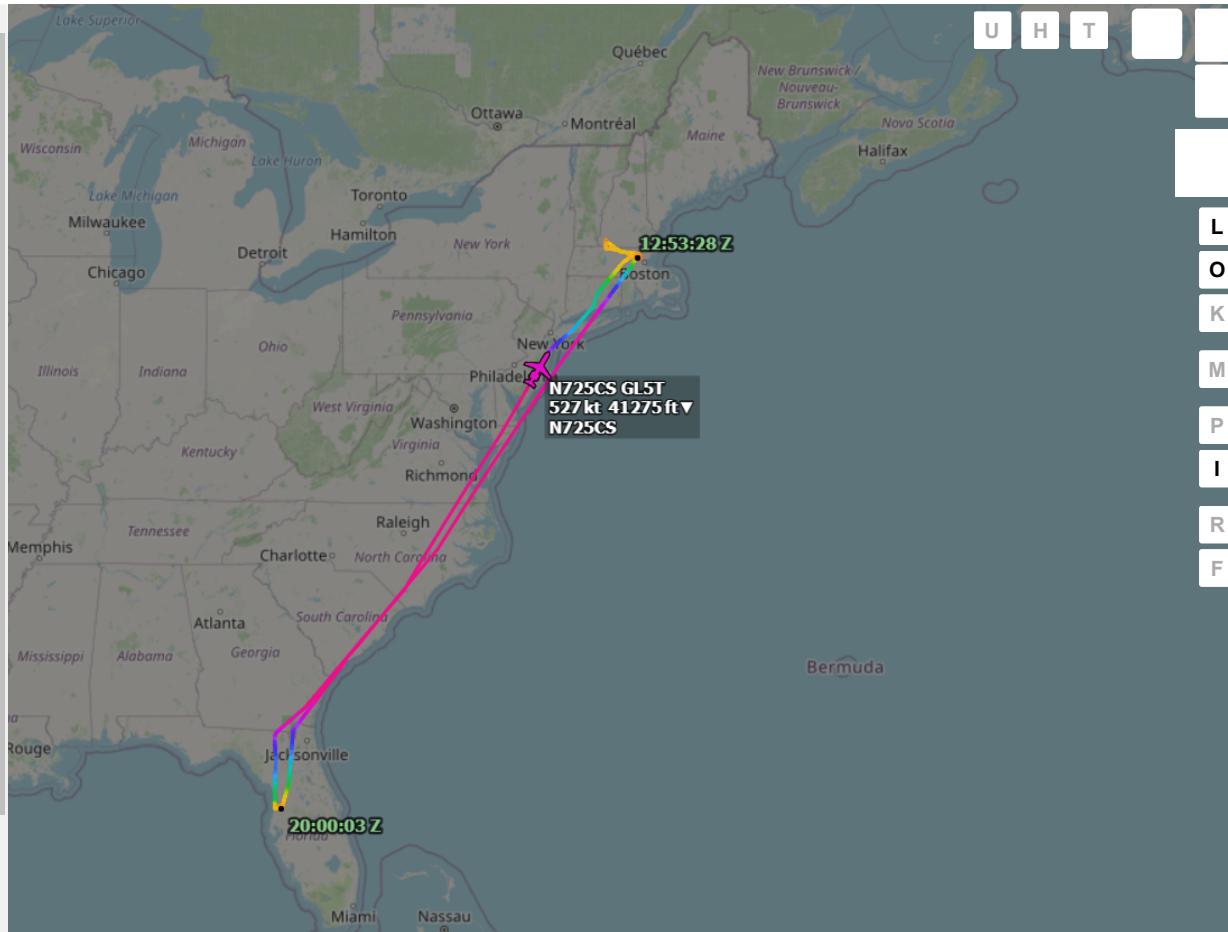
Source: ADS-B

FMS SEL

Sel. Alt.: 31008 ft  
Sel. Head.: 29.5°

WIND

Speed: n/a



U H T

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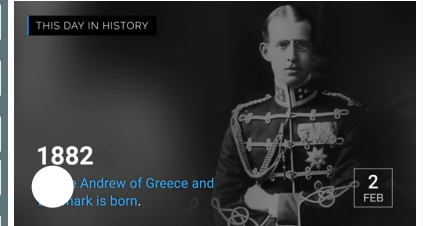
Premium Login: no ads / Sat.  
Layer

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tar1090 on github

Total Aircraft: 0

On Screen: 1



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ADS-B  UAT / ADS-R

MLAT  TIS-B

Mode-S  Other

ADS-C

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LADD

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Filter by registration:

[Filter](#) [Reset](#)

Filter by country of registration:

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Callsign Type Squawk Alt. (ft) Spd. (kt) RS

N725CS GL5T 2102 41275 ▼ 527 ▼

adsbexchange.com

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**From:** [Karlen Reed](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [jennifer.hart](#); [Michael MacClary](#); [mike.barrett@masenate.gov](mailto:mike.barrett@masenate.gov); [Gentile, Carmine - Rep. \(HOU\)](#); [simon.cataldo@mahouse.gov](mailto:simon.cataldo@mahouse.gov); [Matthew Johnson](#); [Linda Escobedo](#); [Terri Ackerman](#); [Mary Hartman](#); [Henry Dane](#); [Kerry LaFleur](#)  
**Subject:** Annursnac Hill Association comment, EEA #16654, L.G. Hanscom Field North Airfield Development ENF  
**Date:** Wednesday, February 8, 2023 1:00:41 PM  
**Attachments:** [2.9.23 Annursnac Hill Association comments - Hanscom Airfield - EEA #16654.pdf](#)

---

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2.8.23

Mr. Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

re: Annursnac Hill Association comment, EEA #16654, L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,  
Please find enclosed the comments of the Annursnac Hill Association of Concord, MA to the above proceeding. A copy of this filing will be submitted also through the MEPA public comment portal.

Please let me know if you have any questions. Thank you.

Karlen Reed, 83 Whits End Road, Concord, MA 01742  
781.396.4284

cc: Jen Hart and Michael MacClary, Co-Presidents, AHA  
Senator Michael Barrett  
Representative Carmine Gentile  
Representative Simon Cataldo  
Concord Select Board  
Concord Town Manager, Kerry LaFleur

**From:** [Pippa Shulman](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Wednesday, February 8, 2023 9:26:22 AM

---

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Dear Mr. Strysky,

As a resident of Concord, MA who lives in the area near Hanscom Field I am writing to express my strong opposition to EEA #16654: L.G. Hanscom Field North Airfield Development ENF. The scope of this expansion will dramatically and drastically alter the character of the airport and its impact on neighborhoods; not to mention the environmental impact of 26 new buildings on drainage, forest loss, bird migration, and watershed.

I want to be clear that I am not anti-airport. We bought our house a year ago knowing it is on the flight path, we are generally not bothered by the air traffic and see it as an economic engine of the area. What I am opposed to is unbridled and unrestrained development and growth. The fact is that a structural increase of this type of infrastructure addition will increase capacity for more air traffic, and once you build it they will come. Corporate jet traffic is increasing worldwide and we should not expect it to diminish here, but we can do something to limit that growth.

I hope you will take into account the strong objection of neighbors and the environmental damage this project will bring and not let this project proceed.

Thank you very much,

Eliza Shulman  
643 Old Bedford Road  
Concord, MA 01742

**From:** [gail o'keefe](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Wednesday, February 8, 2023 10:21:51 AM

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Good morning,

I write to express my opposition to the proposed MassPort land swap at Hanscom. The move will impact our communities for decades to come by increasing private jet traffic, increasing carbon emissions, even as we struggle to reduce our personal carbon footprint.

We have a short runway to reduce the momentum of environmental degradation and climate disaster. Now is the time. It is hard to believe that the state of Massachusetts is even considering such a move at this time, while we face an existential crisis to our planet.

Even if you are, as an individual, not convinced of the impact of private jets on the climate, perhaps you can take into account the wellbeing of neighboring communities, who are already raising their voices against the roar of large Lear jets landing in their backyards. Or perhaps you can take a moment to consider the altered environment of birds and animals in the precarious neighboring National Wildlife Refuge.

Moreover, please consider the political fallout of a Massport land swap, at a time when Massport is purportedly working with community neighbors. This swap is not for the benefit of surrounding communities, the only people who stand to benefit are the very few who use private jets while the rest of us are driving a Prius to cut our fossil fuel usage.

This is a very poorly thought out proposal, which I implore you to reconsider.

Sincerely,  
Gail O'Keefe  
22 Slocum Rd  
Lexington MA

**From:** [GREENBERG, MATTHEW C CIV USAF AFCEC 66 ABG/CZOE](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Comments on Hanscom Field North Airfield Development Project, for Draft Environmental Impact Report  
**Date:** Wednesday, February 8, 2023 3:43:48 PM

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Dear Mr. Strysky,

I am the Remedial Project Manager for the Air Force at Hanscom Air Force Base in Bedford, MA. I attended the virtual MEPA consultation session on 06 February for the potential North Airfield Development project at Hanscom Field. This email serves as submittal of a comment to be addressed in the future Draft Environmental Impact Report.

Air Force's comment is as follows:

The Air Force is leading environmental cleanup activities in the vicinity of the proposed redevelopment site under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The US Environmental Protection Agency (USEPA) is leading regulatory oversight for these activities. The CERCLA site in the vicinity of the proposed redevelopment is known as Operable Unit 1 (OU-1). A Record of Decision (ROD) for OU-1 was signed by the Air Force and EPA in 2007 and details the remedial action that the Air Force must conduct at OU-1.

Included in these remedial actions are specific Land Use Controls that must be maintained in order for there to be restriction of access to property in order to prevent or reduce risk to human health and the environment. The 2007 ROD for OU-1 details what these Land Use Controls are. It is available to the public on the Air Force's Administrative Record, located here: [AF Administrative Record](#). Note also that Section 9 of the 2017 Hanscom Field Environmental Status and Planning Report includes a discussion of OU-1.

In addition, OU-1 is now undergoing planning phases for a remedial investigation for an emerging contaminant known as per- and polyfluoroalkyl substances (PFAS). PFAS presence has been confirmed at OU-1, and the remedial investigation is intended define its nature and extents above current Massachusetts Maximum Contaminant Levels and EPA Regional Screening Levels.

How will the proponent ensure that the OU-1 Land Use Controls are able to be maintained and are not negatively impacted? How will the proponent ensure that activities associated with the PFAS remedial investigation and future related remediation activities are not also impacted?

Please let me know if you have any questions or require additional information.

//SIGNED//

Matthew Greenberg, GS-12  
JBMDL Installation Support Section (ISS)  
RPM Hanscom Air Force Base  
Air Force Civil Engineer Center  
DSN 845-6148, COMM 781-225-6148

Cell phone 617-620-4157  
[matthew.greenberg.2@us.af.mil](mailto:matthew.greenberg.2@us.af.mil)

**From:** [Julia](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA#16654: LG Hanscom Field North Airfield Development ENF  
**Date:** Wednesday, February 8, 2023 9:17:42 PM

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With the expansion of Hanscom, we would expect an increase of private flight activity. I have been a resident of Concord for 35 years, and I bird with the weekly Great Meadows NWLR bird census team. Please respond to my following questions.

1. Approximately two decades ago when private air traffic was more common, memorable **lethal and near-lethal crashes/collisions** occurred. In several of these situations, aircraft landed on trees in the woods on private and public land bordering the airfield as well as on or adjacent to the airfield. What **specific measures** will be used now to diminish the risks of recurrent such events?

2. In facilitating more private air traffic, what **specific safety measures** will be in place to avoid **bird strikes/collisions** when flying over Great Meadows NWLR - Concord?

Significant numbers of Canada Geese are present. Counts of 500-800 individuals a day have been counted throughout the year on the Refuge and on the adjacent Concord River. Bald Eagles, other hawks and ducks, flocks of blackbirds, and other birds frequent the Refuge. Because weekly bird censuses occur in the Refuge throughout the year, numeric data of bird numbers has been documented specifically in the Refuge.

Thank you,  
J. Yoshida, MD



**From:** [Heilman/Shepard](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hangar expansion at Hanscom  
**Date:** Wednesday, February 8, 2023 10:07:28 PM

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I spent a lot of time birding at Great Meadows in Concord. That area already experiences lots of plane activity. Have there been any studies done about the possible impact to migrating birds that come through this area? There is currently a very active bird population at Great Meadows, with the increase in noise from more flights, is there any data on how this might cause a decrease in the bird census in this area?

If trees are to be removed in order to do construction, what mitigation is planned to offset the loss of trees and the resulting environmental impacts.

Thank you,  
Nancy Shepard  
2 Baskin Road  
Lexington MA 02421

**From:** [Sallye Bleiberg](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom AFB  
**Date:** Wednesday, February 8, 2023 9:34:04 PM

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Mr. Strycky:

I strongly oppose the proposal that will increase private jet traffic to and from Hanscom. As a resident of Lexington, I do not want to listen to the noise of these low-flying jets. Furthermore, while private jet travel may be more convenient for the wealthy, it is incredibly destructive of the environment. As MA is moving toward fulfilling its Zero Carbon Emissions laws, the creation of so much more jet traffic is the antithesis of these laws unless, of course, all the jets will be required to be fully electric.

Sallye Bleiberg  
960 Waltham St  
Lexington 02421

**From:** [Bill Kemeza](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [dkaye@concordma.gov](mailto:dkaye@concordma.gov); [Linda Escobedo](#)  
**Subject:** Private Development of Hanscom Property  
**Date:** Wednesday, February 8, 2023 11:11:04 AM

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Dear Sir,

I was unable to attend the site visit or the public hearing for the private development of hangars at Hanscom Airport but I have a number of questions for which I ask a response. I have learned that about 75 people attended the site visit and 140 attended the hearing. I believe the numbers would have been significantly higher if there had been clearer and more timely communication with the public. I certainly would have been at both events.

1. Why was there such short advanced notice of the site visit and the hearing given to the general public?
2. The hearing was on February 6 with comments due on February 14. Given the level of interest that certainly could have been anticipated, why is the invitation for questions and comments given such short notice?
3. Given the increased use of the airport that this must represent, have there been direct conversations with two of the largest and most significant neighbors: The National Wildlife Refuge at Great Meadows and the National Park Service at Minuteman National Park?
4. Will you specifically address the increased noise impact on the Wildlife Refuge?
5. Will you specifically address the increased noise and its impact on the visitor experience at Minuteman National Park?
6. The area to be developed and the increased use of the airport will likely impact migratory species, birds and insects, nearby. Will that be studied?
7. There have been field studies done in the area on Wood Turtles. It is a species of special concern and this project is next to that area in Concord.  
See: <https://www.zoonewengland.org/protect/here-in-new-england/turtle-conservation/wood-turtles/>  
Have you studied or assessed the impact on this last remaining population in Concord?
8. Will you contact ZooNewEngland to see what other work they may be doing on reptiles in the abutting areas?
9. On The GIS maps for the Commonwealth, the project area seems to overlap the Estimated Habitats of Rare Wildlife. Will you study and assess this impact?

I look forward to the responses and wish to be notified of other developments in this proposal.

Thank you.

Willam Kemeza  
28 Davis Court  
Concord, MA 01742  
617-875-5647

**From:** [Betsy Devine](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** no on more hangars  
**Date:** Thursday, February 9, 2023 9:35:20 AM

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Government exists to push back on efforts of rich powerful people to make their lives better at the expense of much larger numbers of people. Please do your job and block this. Elizabeth Wilczek, registered voter, Concord MA

Please blame my iPhone--I do.

**From:** [Bob Creech](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Proposal for 27 new hangers at Hanscom Field  
**Date:** Thursday, February 9, 2023 10:36:37 AM

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Dear Mr. Strycky,

The proposal says that adding 27 new hangers at Hanscom will result in fewer flights in and out of Hanscom.

I assume that Runway Realty Ventures, LLC and North Airfield Ventures, LLC are doing this as a revenue generating venture and that they will rent space for profit in the new hangers and the renovated hanger.

Based upon their letter, this implies that the people operating the airplanes are also going to benefit by either saving money or by operating more efficiently as a result of having to make fewer "ferry" flights to Hanscom.

Questions:

- 1) please confirm (or not) my assumptions and elaborate, in a general way, on how this makes financial sense
- 2) how many fewer flights will there be in a week or month or year
- 3) will the hangers be used for anything other than indoor parking
- 4) Is there a reason why these planes do not park outside currently
- 5) Are there future uses for the hangers that have not been mentioned in the letter from the Venture companies
- 6) Could the hangers be used in a way that increases air traffic at Hanscom in the future

Thanks,

Bob Creech  
2 Grimes Rd  
Lexington, MA 02420  
[bobcreech@aol.com](mailto:bobcreech@aol.com)

**From:** [MEPA \(EEA\)](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Fw: EEA#16654 Hanscom Field expansion questions  
**Date:** Friday, February 10, 2023 9:45:14 AM

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**From:** Cris Van Dyke <cris\_vandyke@yahoo.com>  
**Sent:** Thursday, February 9, 2023 4:06 PM  
**To:** MEPA (EEA) <mepa@mass.gov>  
**Subject:** EEA#16654 Hanscom Field expansion questions

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I am very concerned with the huge expansion of Hanscom field not only for the increased noise and vehicle traffic in the surrounding towns but quality of life and detrimental effects on climate, air quality and wildlife.

Great Meadows NWR and the surrounding farms, woodland and rivers are home to numerous species of wildlife year round with a large population of Canada geese numbering in the hundreds, hawks, vultures, owls, swans, shore birds and numerous species of ducks many of which migrate through during the year. Please explain how you plan to protect wildlife and people from bird strikes?

Sincerely,

Cristine Van Dyke,  
Concord, MA

Sent from my iPad

**From:** [Donald Saletnik](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom North Airfield Project  
**Date:** Thursday, February 9, 2023 4:15:05 PM

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Donald Saletnik 37 Kendall Court Bedford MA,

I believe this project is really too massive for this location. Is there a plan for storm water run off? The edge sport fields are directly behind this boondoggle of a project. Your attempt at being "carbon neutral " is a fantasy!!! Tell the corporate people to go where the planes are stored now. This can solve the problem of ferry traffic??!  
Sent from my iPhone



**From:** [Elizabeth Awalt](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion  
**Date:** Thursday, February 9, 2023 10:20:24 PM

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Hello,

I live in Concord within the Great Meadows Wildlife Sanctuary. Already we experience aircraft ( often extremely noisy) flying over our home and the sanctuary. The noise has a big affect on the birds and other wildlife in the area and on the quiet area we so value. It would be a big mistake to allow Hanscom to expand and I oppose any additional development of the airport. Please do not support this misguided attempt to expand the airport.

Elizabeth Awalt  
396 Great Meadows Rd.  
Concord, MA

Sent from my iPad

**From:** [Gary Davis](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Subject:** Clarification Request  
**Date:** Thursday, February 9, 2023 2:15:22 PM

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Mr. Stryisky,

The Lincoln Select Board will hold a special meeting early Friday morning to discuss the Hanscom proposal and develop comments for submittal.

I have one question I hope you can clarify in time for that meeting.

The aircraft parked there will not carry or pick up passengers, with the exception of those owned by local corporations and athletic teams traveling to/from local venues.

The majority of parked aircraft there otherwise is for the purpose of waiting for another assignment, and to avoid the need to fly to another location elsewhere for that wait.

True? Partly True?

Thank you,  
Gary Davis  
Lincoln  
Email [garyddavis04@gmail.com](mailto:garyddavis04@gmail.com)  
Cell phone 781-228-9753

# HANSCOM FIELD ADVISORY COMMISSION

February 9, 2023

Alexander Stryisky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Stryisky@mass.gov  
(857) 408-6957

Dear Mr. Stryisky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

Hanscom Field Advisory Commission (HFAC) provides continued communication and education among the communities surrounding Hanscom Field and Massport and acts as an advisory commission for review and reaction to decisions relating to Hanscom Field, including land use, noise abatement, and transportation needs.

While HFAC has been aware for some time that a project would be proposed for the Hanscom North Airfield area, this filing is the first time we have been given any details about the proposed project. For many months there was the appearance that the sale and renovation of the old Navy Hangar was completely distinct from the North Airfield project; now it appears these projects are combined and have always been guided by a single developer. The scale of this project and short comment timeframe make it difficult for area communities and this commission to fully understand the proposal in the allowed comment period.

The reactions to this project known to HFAC have all been negative. The surrounding towns are all in the process of submitting letters in opposition to the project and many community groups are also opposed. The Minute Man National Historical Park and Great Meadows National Wildlife Preserve have both raised concerns. A number of members of the state legislature have expressed concerns or opposition to this project. HFAC is not aware of any local groups supporting this project.

There are many environmental concerns that need to be addressed.

1. The overall impact of this airport on climate change is certain to be harmful. The reduction in ferry flights does not appear to be a significant mitigation of this

impact. No data has been given to HFAC indicating how many ferry flights will be involved or the overall expected impact on climate change is expected from this project. HFAC requests data showing that the overall expected impact of this project will reduce climate change impacts, in alignment with regional goals to achieve net zero carbon emissions by 2050.

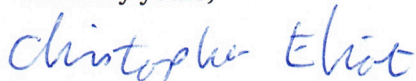
2. It is understood that the project includes a “fuel farm” despite being located over an aquifer. HFAC requests information proving that this fuel farm will not endanger the aquifer or local drinking water supplies.
3. There is a process under way to nationally phase out the use of leaded avgas. HFAC seeks assurance that none of the new hangar space will be used for aircraft operating on leaded avgas. HFAC seeks assurance that the new fuel farm will not include facilities to store or dispense leaded avgas (which is available from other FBOs at Hanscom Field).
4. The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase. HFAC requests data showing that this will not produce a net increase in jet aviation traffic in the region, accounting for any possible reduction in ferry flights.
5. The project includes plans to upgrade taxiway and runway capabilities to accommodate larger Group 4 aircraft. HFAC requests data showing that this addresses an established need for the regional transportation system.
6. There is a climate change emergency and every effort must be made to phase out and not expand use of fossil fuels. HFAC requests an explanation of how this project contributes to the solution of this emergency.
7. Aviation contributes to the climate change emergency. HFAC requests detailed plans for the use of sustainable airplane fuel or alternate fuels such as hydrogen or electric power by all aircraft supported by this project. HFAC expects that this project will demonstrate a monotonic reduction in greenhouse gas emissions to reach a net-zero target by 2030.
8. Hanscom Field adjoins Great Meadows National Wildlife Preserve. HFAC requests that this project be studied to show that protected wildlife in the national preserve will not be harmed.
9. Many significant historical sites are in the immediate vicinity. Aviation using Hanscom Field is supposed to avoid creating disturbance over Hartwell Tavern in

the Minuteman National Historical Park. The “shot heard round the world” was fired at nearby Old North Bridge in Concord and the Lexington Battle Green is an important historical site and tourist attraction. HFAC requests information showing how these historical sites will not be harmed, including tourist revenue, educational opportunities and recreational enjoyment of the spaces.

10. The plan involves removal of approximately 34 acres of wooded area. HFAC requests information showing compensatory protection of an equivalent area elsewhere in the region.

The overall impact of the proposed North Airfield/Old Navy Hangar projects is likely to cause regional harm and contribute to environmental projects in many ways. This large airport expansion is incompatible with the densely populated region. It is not expected that these harms can be mitigated in any way. Therefore, the Hanscom Field Advisory commission joins with regional town governments and citizen groups to oppose this project.

Sincerely yours,



Christopher Eliot, Ph.D. HFAC, Chair

[hfac@lincolntown.org](mailto:hfac@lincolntown.org)

**From:** [isabelvbailey@gmail.com](mailto:isabelvbailey@gmail.com)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [Delia Kaye](#)  
**Subject:** Expansion of Bedford airport  
**Date:** Thursday, February 9, 2023 9:16:46 AM

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I am writing concerning the mass port expansion. The hard scape expanse is so extensive. What are you going to do about chemical contamination of the water and land? What are you doing to do about the heat absorption? Are you going to cover the buildings with solar and the pavement?

This area has significant conservation habitat including native plants for biodiversity and rare animals. Please thinking about our ecosystem and the mandate for effects of climate changes.

Isabel Bailey  
121 Everett street  
Concord ma 01742

Sent from my iPhone

**From:** [Jay Vogt](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Thursday, February 9, 2023 8:18:32 PM

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Greetings:

The proposed development will have far-reaching negative effects, given that Hanscom Field civil airport is located adjacent to Minute Man National Historical Park, near Great Meadows National Wildlife Refuge, and near many historic sites in four towns visited by millions of people every year seeking to connect with America's revolutionary past. The surrounding towns have paid their debt to society by providing land to the military- in an act of patriotic service - for their use. That does not mean that the residents of these towns welcome unlimited commercial and civil development. The proposed development will bring noise and environmental pollution to a region beloved by all Americans and stewarded carefully by locals for generations. It is short-sighted and inappropriate.

Regards, Jay W Vogt

**Jay W Vogt**

Web: <http://www.peoplesworth.com> TEDx: <http://bit.ly/JayWVogtTEDx> Book: <http://bit.ly/RechargeYourTeam>

**From:** [judith stein](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [Stein](#)  
**Subject:** Hanscom expansion  
**Date:** Thursday, February 9, 2023 8:35:23 PM

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Dear Alexander, Hanscom is planning this massive expansion directly over our condominium, which is Battle Road Farm in Lincoln, Mass. My address is 11 C South Commons, Lincoln. This is a 120-unit condominium. This whole project was just sprung on all of us.

No one had any knowledge about it, and there's been no opportunity to object to it. Can you help us to object to this awful plan? It's directly next door and above our condos. Thank you so much in advance. Sincerely, Judy Stein, Lincoln, Ma.

Sent from my iPhone



**From:** [Michael and Kendra Elliott](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Massport expansion  
**Date:** Thursday, February 9, 2023 4:03:33 PM

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As Bedford residents living adjacent to Hanscom on Kendall Ct, we would strongly like to voice our dissent to the proposed Massport Expansion project. We believe that there are significant environmental and pollution impacts that will negatively affect the lives of Bedford residents.

Thank you,  
Kendra Elliott

**From:** [Nicole Palmer](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF.  
**Date:** Thursday, February 9, 2023 6:02:54 PM

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Dear Alexander,

I am a resident of Concord and live just in-front of Great Meadows. I feel especially connected to the proposed expansion of Hanscom as the planes fly right over my home and property. From all the information I've read I am strongly opposed to such expansion. I purchased my property at Great Meadows for a life in Nature and prefer not to live at Logan Airport.

I am an environment advocate who doesn't subscribe to the theory of bigger is better.

As Henry David Thoreau, former Concord resident said "simplify simplify simplify".

Sincerely yours,

Nicole Palmer

25 Cranefield Rd  
Concord, Ma 01742  
774-249-1666

**From:** [Rick 151](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Hart Jennifer Jen](#)  
**Subject:** Hanscom expansion plans  
**Date:** Thursday, February 9, 2023 6:14:45 PM

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We live at 151 Annursnac Hill Rd, under the flight path into Hanscom, 3 miles from the approach end of runway 11. We have lived here for 45 years. The airport noise has gotten worse. Every 3 minutes for hours on end we are interrupted by landng and approach activity. Watching the aircraft, one can discern that some corperate aircraft are practicing approaches, up to 6 times. We are also hearing helicopter and military jet flights at night before 7am and after 11pm.

Increasing Hanscom capacity will further erode a deteriorated situation. Previous noise studies and environmental studies have documented the harms.

We oppose this plan.

Thanks,  
-Rick

Richard Moore (comcast)  
151 Annursnac Hill Road  
Concord, MA  
508-572-9317

**From:** [Robert Enders](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Proposal for 27 new hangars at Hanscom civil airfield moves in the wrong direction  
**Date:** Thursday, February 9, 2023 8:22:42 PM

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To MEPA;

Private jet traffic into and out of Hanscom is already becoming thoroughly obnoxious. Landings and take-offs occurring every couple of minutes, turning backyard conversations into shouting, and making sleeping on summer evenings fitful. These jets are much louder and far more environmentally damaging than small propeller planes. All this is to be endured by Hanscom's neighbors and the Great Meadow bird sanctuary so that captains of industry can jet to the Hamptons, Nantucket, and beyond, spewing far more than their share of greenhouse gases. When planes become quieter and less polluting, try again. Until then count me strongly opposed.

Robert Enders  
11 Kimball Rd  
Lexington MA  
[rob.enders@verizon.net](mailto:rob.enders@verizon.net)

**From:** [Gmail Acct](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Concerns about proposed Hanscom expansion  
**Date:** Thursday, February 9, 2023 3:14:11 PM

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Alexander,

I am a resident of the community that lies adjacent to the Hanscom airfield. I am writing to you to voice grave concern for the total lack of transparency around the expansion project and blatant disregard for the residents of our community and other Bedford residents.

I would like to understand how the following issues will be handled and addressed:

1. Increased jet traffic, carbon & poisonous gas emissions, and noise, including jet engine startups. (All of that currently occurs across the airfield on the south (2A) side of the airport.) Massport says "not much change is expected" in traffic as these hangars will eliminate 'ferry flights' of empty jets to get them to Hanscom when they have to be based elsewhere. This initial proposal has no documentation of this (not even a count of existing ferry flights), and the statement strains credibility.
2. There will be aircraft refueling (possibly with underground tanks) yards away from Hartwell Road.
3. There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced.
4. A huge amount of forest with mature trees will be cleared and paved over.
5. There will be increased road traffic (including trucks) during construction and after.
6. This is solely for the benefit of wealthy corporate executives and companies that can afford to buy and use private jets.
7. There may be fueling trucks driving on Hartwell Road, as Massport has not committed to preventing this. It has only vaguely stated its "intention" and has no firm requirement to keep the refueling trucks within airport property. The rep for the property developer said "the *intent*" is to have them [the fueling trucks] travel over to the North Airfield area from the current operations on the south side of the field.
8. There will be health and safety effects to our children and us, living so close to the airport, both in our development and for all those kids playing on The Edge fields.
9. There will be huge water runoff in storms (with some fuel contamination) without a clear indication of how this will be mitigated.
10. There will be "heat island" effects - with all the increased paving and buildings, there will be a huge amount of heat produced (and absorbed/retained at night) by the pavement and buildings, plus the loss of natural cooling that the forest currently provides.

11. There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments.
12. **This can only negatively affect our property values from above.**

This proposal completely flies in the face of ongoing climate concerns in favor of the comfort of a select few. I find this unconscionable. The area is already a superfund site (<https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0100967>) and Bedford is forced to rely on other towns for its drinking water. I have seen no serious conversation around any of the ill effects arising from the expansion. Please make every effort at your disposal to help us taxpaying residents understand the exigency in requiring this expansion beyond blatant revenue grab for the airport and serving the needs of the .0001%, who have no local ties to the area or concerns for its well being.

Thank you for your attention to this matter.  
Zach Abraham

21 Kendall Court  
Bedford, MA 01730

**From:** [Bonnie Polakoff](mailto:Bonnie.Polakoff@concordma.gov)  
**To:** [Strysky, Alexander \(EEA\)](mailto:Strysky.Alexander@concordma.gov)  
**Cc:** [mike.barrett@masenate.gov](mailto:mike.barrett@masenate.gov); [simon.cataldo@mahouse.gov](mailto:simon.cataldo@mahouse.gov); [carmine.gentile@mahouse.gov](mailto:carmine.gentile@mahouse.gov); [smcandrew@concordma.gov](mailto:smcandrew@concordma.gov); [mjohnson@concordma.gov](mailto:mjohnson@concordma.gov); [tackerman@concordma.gov](mailto:tackerman@concordma.gov); [lescobedo@concordma.gov](mailto:lescobedo@concordma.gov); [hdane@concordma.gov](mailto:hdane@concordma.gov); [mhartman@concordma.gov](mailto:mhartman@concordma.gov); [klafleur@concordma.gov](mailto:klafleur@concordma.gov)  
**Subject:** Proposed Expansion at Hanscom Field  
**Date:** Friday, February 10, 2023 3:31:56 PM

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CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

We are writing to you regarding the proposed expansion of Hanscom Field.

Our home sits directly over the Hanscom flight path and what began, when we first purchased our home some 27-years ago, as minor air traffic has turned into a major nuisance over the years. It's gotten to the point where we can't have a conversation in our backyard without being interrupted whenever there's a plane overhead. The noise from the planes makes it so we can't hear ourselves think, not to mention that the noise from the planes scare away the birds and the other wildlife we often see on a daily basis. As you may know, Concord is 2-acre zoned historical town, and most of us who live here do so because we seek a quiet and peaceful outdoor environment. An expansion of Hanscom Field runs contrary to that and we worry about the impact of larger, more powerful planes not only on our ability to enjoy our outdoor space, but on the wildlife in both Great Meadows National Wildlife Refuge and Minuteman National Historical Park.

How many flights currently go in and out of Hanscom Field on each day of the week and during which hours? What will change once the proposed expansion of Hanscom Field is finished — how many flights will be going in and out and at what hours, what is the size of the airplanes that will be allowed to take off and land from Hanscom Field, what is the noise level of the planes going in and out now as opposed to the planes that will go in and out after the proposed expansion, what is the benefit of the proposed Hanscom expansion to homeowners who are in the Hanscom flight path. Basically, what's in it for us? As far as we can tell, the proposed expansion will only benefit those who own private jets or have shares in companies who lease private jets. This represents a tiny fraction of the flying public and it's beyond us as to why such a project is possibly needed, except as a revenue builder for the above companies, as well as for Massport. There is zero benefit to anyone who lives here. Further, the only people the expansion will benefit are those who fly private and that's less than 1% of the population — surely not a large enough number to justify the people and wildlife the proposed project will harm.

Expanding runway Romeo to allow larger planes to take off and land from Hanscom Field is unnecessary and detrimental to our quality of life. Further, allowing these larger planes will only increase the noise pollution we already suffer. We'd like to see hard numbers regarding these larger planes and the noise and pollution they generate, versus the smaller jets that go in and out of Hanscom now. We'd also like to know the plans for shielding these planes from invading our visual backyard space, as the planes flying overhead now are very visible to us and at times, appear to be only somewhat higher than the treetops!

We look forward to hearing the answer to these, our preliminary questions.

Thank you in advance for your attention,

Bonnie and David F. Polakoff, MD  
68 Whit's End Rd.  
Concord, MA 01742

**From:** [JOHN CONLEY](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** potential expansion at Hanscom Airport  
**Date:** Friday, February 10, 2023 10:53:23 AM

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Hello,

I live in Concord within the Great Meadows Wildlife Sanctuary. Already we experience aircraft (often extremely noisy) flying over our home and the sanctuary. The noise has a big affect on the birds and other wildlife in the area and on the quiet area we so value. It would be a big mistake to allow Hanscom to expand and I oppose any additional development of the airport. Please do not support this misguided attempt to expand the airport.

John Conley  
396 Great Meadows Rd.  
Concord, MA



**From:** [jonathanstevens73@gmail.com](mailto:jonathanstevens73@gmail.com)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Public Comment re: EEA #16654: L. G. Hanscom Field North Airfield Development ENF  
**Date:** Friday, February 10, 2023 3:48:48 PM

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Mr. Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Public Comment re: EEA #16654: L. G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

I am Chairman of the Trustees of the Hidden Trail Condominium Trust Homeowners Association covering 22 homes located on Black Horse Place in Concord within the Hanscom flight path. This communication is in response to the above Environmental Form (ENF) regarding the proposed expansion of the North Airfield area at Hanscom Field in Bedford, MA which borders Concord.

I was present at the site visit on Monday 2.6.2023 and I was able to be part of the zoom webinar that night. As presented, I oppose the Hanscom Field expansion slated to begin construction in January 2024. Much of the adverse impact of the project will be felt in Concord, but Concord residents will not benefit from the project.

I am concerned about increased aircraft operations.  
I am concerned about noise, air, water and soil pollution.  
I am concerned about public health.

Questions:

What are the current number of flights per day including the number of "ferry flights"?  
What is the planned number flights after the project is completed?  
What is the amount of carbon emissions from airport operations now and what will be the emissions in when the project is completed?

Comments:

My reading and hearing from the Information already provided is that there will be more flights and more emissions which will adversely affect the health and welfare of the residents in Bedford and in the surrounding towns.  
The 58% increase of 9 acres of impervious area will have a major negative impact on the environment and subsequently public health.

Please do not allow this project to go forward.

Sincerely Yours,  
Jonathan Stevens

Jonathan Stevens  
85 Black Horse Place, Concord, MA 01742  
Cell: 978-314-3384  
E-mail: [jonathanstevens73@gmail.com](mailto:jonathanstevens73@gmail.com)

**From:** [Joyce Isen](#)  
**To:** [Strycky, Alexander \(EEA\)](#); [Joyce Isen](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Friday, February 10, 2023 9:17:56 PM

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As a resident of Concord, I'm opposed to the expansion plan for Hanscom. If I understand correctly, the plan calls for a large increase in impervious surfaces that exceeds environmental thresholds and for adding new hangars on a wooded site. We have environmental regulations for a reason and it makes no sense to give anyone carte blanche to violate them. The Climate Crisis is real. I see no reason for an increase in airport size and activity. It will have a negative impact on ground traffic, air traffic, water usage, carbon emissions, and noise pollution.

Joyce Isen  
21 Wright Farm  
Concord, MA 01742

**From:** [Karen Belinky](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654. L.G. Hanscom Field North Airfield Development ENF.  
**Date:** Friday, February 10, 2023 6:51:03 PM

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Dear Mr. Strycky,

I was a participant in the zoom call about the proposed project at Hanscom earlier this week. I am shocked by the scale of this endeavor. I have lived in Concord and for 40 years and have tolerated an uncomfortable level of noise pollution from Hanscom for years. The idea that this plan will allow much bigger planes as well as significantly higher numbers flights is extremely distressing and very detrimental to the health and wellbeing of surrounding communities and to the incredibly rich natural and historic landscapes in this area. This plan is aimed at providing conveniences to wealthy individuals and corporations at the expense of the environment which is under so much stress. It undercuts all the efforts being made throughout the state to mitigate/reverse the impact of climate change. It will create an increasingly unhealthy environment for all of us.

I was rather amused by the argument put forth that the “ferry flights” will be eliminated, leading to no greater number of flights with the new facilities than currently are flown in and out of Hanscom. It was clear in the meeting that they either (1) have no evidence at all of the number of flights currently and so can’t give any estimate of the number of flights that will result from their plans or (2) won’t reveal a number they know will not justify their claims. I’d like to suggest a proposal for you to put forth in regard to these assumptions. Publicly identify the annual numbers of “ferry flights” flown over the past 5-10 years. Since they are claiming that the new numbers of flights won’t be greater than the number of flights now, they should be required to limit the number of flights to the current annual numbers plus 5%. You must also assure that the shockingly large planes that are being suggested as viable for use at Hanscom are NOT ALLOWED!

This meeting gave me the definite impression that this is a done deal and that all the meetings and environmental impact studies are just window dressing. You must make sure that both state government and our communities play a defining role in this process. The scope and scale of this project must be severely reduced.

Thank you for your consideration in this critical situation,

Karen Belinky  
39 Holden Lane  
Concord, Ma 01742

**From:** [Leda Zimmerman](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Friday, February 10, 2023 12:21:01 PM

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Dear Mr. Strycky,

As a neighbor (read: in the flight path) of Hanscom Field, I want to register my alarm and opposition to the plan to build private jet hangar space at Hanscom Field. This plan smacks of greenwashing. Run by Massport, the Hanscom civilian field has been dedicated exclusively to growth, no matter the consequences. Each year, more private/corporate jets fly in and out, not because they don't have a place to stay overnight but because Massport wants to attract more business. The impact on surrounding communities is palpable: excessive noise, bad air, lead and other dangerous plane-emitted toxins settling into our soils. Having attended a number of meetings of the Hanscom-area towns, I can report that there is indifference if not contempt when residents raise concerns about these issues. Indeed, the only response is that growth is both good and inevitable.

The idea that building extra hangars will contribute to the airport's sustainability/clean energy is laughable. We are supposed to embrace the notion that electric vehicles will be used to build the new facilities, which will someday house planes using less-carbon emitting aviation fuels. Current levels of plane traffic are unacceptable, as well as the amount of pollution they cause. Here's a proposal: Reject this plan, mandate that Massport develop credible efforts to reduce the destructive impacts of Hanscom flights on neighboring towns (including serious, additional noise monitoring, measuring lead in soil, and regulating these dangers), and set a timeline for implementation of clean aviation fuels and quieter jets. If targets are achieved then it might be time to consider building some new hangars.

Cordially,

Leda Zimmerman

--

RiverRun Media  
781-652-8967 x10  
[www.linkedin.com/in/ledazimmerman](http://www.linkedin.com/in/ledazimmerman)

**From:** [Paul Shelman](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Comments on MEPA project 16654  
**Date:** Friday, February 10, 2023 9:41:08 PM

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**CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

To Alexander Strysky  
Environmental Analyst  
Massachusetts Environmental Policy Act Office

Thank you for hosting the public events on Monday Feb 6 to learn about and comment on MEPA project **16654** "L.G. Hanscom Field North Airfield Development" submitted by North Airfield Ventures and Runway Realty Ventures.

To be honest, we were taken aback by the one-sided information presented by the consultants on behalf of the proponents. They attempted to paint an environmentally rosy picture of reducing ferry flights (with no supporting data!) and touting LEEDS-gold construction, while being silent on the far more significant environmental hazards of this project.

The environmental damages caused by this project can be profound. Here are just a few examples of why we urge MEPA to stop this development:

A new fuel farm that will contribute further air pollutants at a critical time that the state is trying to contain emissions, and worse, is proposed to be built over a local aquifer.

Expanding runway capability to accommodate larger Group 4 aircraft. What does this have to do with providing hanger storage and eliminating ferry traffic? This is clearly an expansion play by MassPORT. The surrounding national wildlife preserve and nationally significant historical sites are wholly incompatible with class 4 flight traffic.

Setting aside the possibility of larger aircraft than what Hanscom Field already supports, why would Massachusetts now allow additional infrastructure to be built - that clearly will lead to increased private jet traffic? We are in the middle of a climate emergency. More private jets makes no sense.

There are additional concerns, such as the impact on nearby affordable-housing neighborhoods and woodlands, which are typical victims of any airfield expansion project and deserving of environmental protection. It is the big ticket concerns make this a "must not happen" project - the sheer scope and the impacts of fuel, expanded traffic, lower atmosphere pollution and greenhouse gas emissions.

Thanks again,

Paul Shelman  
Shing Hsieh

21 Hilliard Rd  
Lincoln MA 01773

## Advisory Board

Kathi Anderson, Executive Director, Walden Woods Project & Thoreau Institute

Ed Begley, Jr., Actor, Environmentalist

Douglas Brinkley, Author, Professor of History, Rice University

Richard D. Brown, Professor of History, Emeritus, University of Connecticut

Ken Burns, Director, Producer, Historical Documentarian

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Don Henley, Recording Artist, Founder, Walden Woods Project

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Wesley T. Mott, Editor, Emerson Society Papers, Professor Worcester Polytechnic Institute

## Executive Director

Anna West Winter



# 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.

February 10, 2023

MEPA Public Comments  
Alexander.strysky@mass.gov  
MEPA Public Comments Portal

RE: EEA #16654 Hanscom North Airfield Development ENF

Dear Mr. Strysky,

In response to the request for comment on the Environmental Notification Form for the North Airfield Development at Hanscom Field, Save Our Heritage finds the ENF to be inadequate, without a full and accurate disclosure of either the benefit or the environmental impacts. The project should not be allowed to proceed until and unless the shortcomings are addressed.

The ENF does not disclose that this project represents approximately a **tripling of private jet hangar capacity** at Hanscom Field. This clearly provides a considerable amount of additional traffic handling capacity at the airfield. The ENF does not disclose how much traffic will be created, or how much in terms of noise, nighttime operations, or pollution such increased capacity will create over time.

Incredibly, the proponent suggests, without any evidence or data, that flights will decrease by increasing the airport hangar capacity by three times. Extrapolating from this remarkable suggestion, if the airport capacity is further expanded without limit, operations, noise, and pollution would go to zero. The ENF provides no example or data from this or any other airport that increasing the hangar capacity of the airport causes operations to decline. The proposal cannot proceed without properly analyzing the effect of the expansion on volume of operations, noise, and pollution.

The historic towns of Concord, Lexington, Lincoln, and Bedford directly abut the airfield and are already burdened with the negative environmental impacts of private jet travel. Located in Middlesex County, home to the most National Register properties of any county in the United States, these four historic towns include 68 sites listed on the National Register of



Historic Places and 5,657 historic properties listed by the Massachusetts Cultural Resource Commission. The towns of Concord and Lexington are directly aligned with runway 11/29. It is reasonable to assume, although not disclosed, that increases in large private jet traffic will almost exclusively be on runway 11/29 and impact some of the most historically significant Concord and Lexington sites. There is, however, no disclosure of the resulting traffic over these sites, Minute Man National Historical Park, and the Great Meadows National Wildlife Refuge. As a result of Hanscom Field's negative impacts, and the threat of further expansion, Minute Man National Park, Great Meadows, and Walden Pond and Woods have been listed and remain on *America's 11 Most Endangered Historic Places* by the National Trust of Historic Preservation and have been designated a *Last Chance Landscape* by Scenic America. In addition, also the direct result of Hanscom Field impacts, The Hanscom – Minute Man National Historical Park Federal Interagency Working Group was formed under the Clinton Administration in 2001 -- in order to convene federal, state, and local stakeholders in a shared mission to protect and preserve the irreplaceable historic and environmental resources of the park and its environs.

The ENF provides no disclosure of how much particulate pollution, noise pollution, or other pollution will be concentrated on the primary runway path which will clearly impact the surrounding historic, natural, and residential areas in proximity to the airfield.

This expansion is inconsistent with the climate change goals of the Towns and the State. For example, the Town of Concord has worked for a decade to reduce the carbon impact of the town, installing approximately 11 megawatts of solar power, **saving 4,000 Tons of CO<sub>2</sub>e per year**. Even if this proposed expansion caused private jet traffic from Hanscom to increase only 50%, a conservative estimate, it would **add an estimated 400,000 Tons of CO<sub>2</sub>e per year**, dwarfing and negating Concord's carbon savings through solar electrification and other projects over the last 10 years.<sup>1</sup> Even a few percent increase in jet operations would overwhelm **all** of the surrounding towns' environmental efforts for the last decade. Citizens must be provided with information regarding the scale of such impact arising from this source within their towns, along with its expected increase, and provided adequate justification based on an extremely compelling and documented need.

The project location is in the area of a superfund site. The area includes an underground plume of TCE migrating toward the Shawsheen River, and PFAS burn pits. The proposal to **pave an area of approximately 70 football fields** may make remediation much more difficult or compound the problem. The proponent must disclose a plan for how these pollutants will be remediated, and the remediation verified, before the ground is sealed.

There is no disclosure regarding any expected benefit to the public of this proposal. The private jet traffic facilitated by the expansion of Hanscom Field jet capacity is stated by the proponent to be for "high technology corporations, research and development firms, and educational

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<sup>1</sup> The current CO<sub>2</sub>e contribution of the 33,000 Hanscom Jet operations per year is not disclosed or public. However, if 15,000 additional jet operations were added to the current 33,000, with the assumptions of 300 gallons per hour, an average flight duration of 3 hours, and the generally accepted conversion of 7.8kg of CO<sub>2</sub>e per kg of jet fuel, then the increase in CO<sub>2</sub>e would be on the order of **400,000 Tons** per year. By contrast, the CO<sub>2</sub>e savings for all the 11MW of solar power installed in Concord, using a 14% capacity factor and an avoided CO<sub>2</sub>e of .3kg per kwhr, is a relatively tiny **4,000 Tons** per year.

institutions.” The citizens of the four towns have not been made aware of any such specific uses which require additional capacity. In fact, ads for jet services at Hanscom promote luxury vacation travel and a “sublime elite travel experience” for a few extremely wealthy people. A study from the *Wall Street Journal* found that even jets owned by high tech firms travel to resort/vacation destinations nearly 50% of the time. The use of the airport for private jet luxury travel cannot be sufficient to justify the additional CO2e which cancels-out decades of the environmental gains by the host communities. Neither current jet use nor compelling need for expansion has been adequately disclosed. The public needs to be aware of how many trips from Hanscom have a significant contribution deemed by the public as responsible and necessary, and how many, instead, serve luxury travel.

State Senator Mike Barrett, a leading authority on matters of government policy regarding climate change, declared at a public hearing that such an expansion plan is contrary to the stated goals of our towns, our state, and our country.

The disclosures required must include a realistic analysis, based on the experience of other airports, of how much the private jet traffic would increase as a result of this major hangar capacity development. The disclosures must explain the distribution of expected public benefits associated with the current and expanded private jet operations, and how many are due to luxury vacation trips. The disclosures must include the CO2e contribution of those additional flights, based on their estimated travel distances, and the generally accepted multiplier of 7.8kg of CO2e for every kg of jet fuel burned. For the effects of noise, the disclosure should not include data based on the ineffective DNL model which has been internationally rejected (yet historically used by Massport), but instead must include the estimated expansion of the area affected by noise by using the 55dbA Time Above Contours which the Towns previously determined were representative of noise impacts (and formally asked Massport to provide) during prior Environmental Reports; which reports can be easily generated by the Integrated Noise Model which Massport already uses.

This project has not adequately disclosed either the benefit or the environmental impact of the proposed expansion of private jet hangar capacity at Hanscom Field. It cannot proceed without the necessary and appropriate disclosures.



Neil Rasmussen  
President, Save Our Heritage  
neil@saveourheritage.com

**From:** [Tom Flannery](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Comments on the North Airfield Project at Hanscom Field  
**Date:** Friday, February 10, 2023 11:06:12 AM  
**Attachments:** [North Airfield Comments 20230210.pdf](#)

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Dear Mr. Strycky,

I have attached my comments and issues related to the North Airfield Project at Hanscom Field.

Please verify receipt and the ability to open the attachment.

Thank you,

Tom

**Thomas P. Flannery, Ph.D.**  
**93 Kendall Court**  
**Bedford, MA 01730**  
**+1 781 608 7031 (C)**

Comments of:

Thomas P. Flannery, Ph.D.  
93 Kendall Court  
Bedford, MA 01730

I am writing to raise specific issues related to the proposed North Airfield at Hanscom field. Our community, Hartwell Farms, has about 200 multicultural residents living in 75 units. This proposed plan will significantly impact the quality of our lives and the value of our properties.

1. ENVIRONMENTAL IMPACT - - Has a study been conducted of the environmental impact of the North Airfield project?
  - a. Has a study been conducted on asbestos, lead paint, and/or PFAS chemical issues on or near the proposed development?
    - i. There are superfund sites nearby the proposed North Airfield.
      1. Will there be any effect from these sites on the North Airfield project?
    - ii. Will asbestos, lead, PFAS, and other harmful chemicals and agents be banned from the proposed North Airfield?
  - b. The project will include an aircraft fueling facility.
    - i. It was proposed that fuel arrive and be trucked from an entrance other than off Hartwell Road.
      1. Will this be a REQUIREMENT or OPTIONAL approach to fueling storage tanks?
    - ii. Will trucks be allowed to carry fuel to the North Airfield via Hartwell Road?
    - iii. Will the storage tanks be above-ground or underground?
      1. What steps will be taken to prevent the fuel from spilling and leaking into the groundwater?
  - c. What steps will be taken to limit noise from aircraft while at the North Airfield?
    - i. Will Massport INCREASE landing and takeoff fees for aircraft movement before 7:00 AM and after 9:00 PM?
  - d. Will aircraft be allowed to make right turnouts over Hartwell Farms when taking off?
    - i. There are about 200 residents in this multi-ethnic community ranging from babies to senior citizens.
  - e. What will be done to limit the impact on habitat?
    - i. Currently, deer, beavers, foxes, turkeys, and other animals, including reptiles, mammals, and birds, are in habitat around the proposed development.
  - f. Will the trees removed for this project be replaced?
    - i. What is the estimated number of trees or board feet of removed trees?
  - g. How will rainwater be managed?
    - i. Will all water be contained on-site, or will there be the need for a storage pond?
    - ii. What do you expect will be the impact Elm Brook, potentially causing flooding of nearby property and across Hartwell and other roads?
    - iii. Elm Brook is already recorded as having contamination. What will this project do to improve or harm the water quality at Elm Brook? Note that Elm Brook is partially on Massport property.
    - iv. Why was a study on flood events limited to 25 rather than the usual 100-year events?

1. Will a 100-year flood event study be undertaken?
- h. How will the North Airfield receive fresh water for drinking, sanitary and other purposes?
  - i. Will plane washing be allowed?
    1. How will water from plane washing be handled to avoid runoff and entry into the local groundwater?
  - i. What steps will be taken to ensure maintenance activities will not contaminate groundwater, surrounding air, or land?
  - j. Will the North Airfield development create a "heat island" that can impact the surrounding area?
    - i. What steps will be taken to reduce the heat produced by the paved area and buildings?
      1. Will the proposed North Airfield project be limited to 11 acres of hanger space and 39 acres of impervious asphalt?
        - a. Will future expansion be allowed within the North Airfield proposed boundaries?
  - k. What steps will be taken to shield the proposed North Airfield development from the surrounding area, which includes the conservation area?
  - l. Will piston engine planes use the proposed North Airfield, resulting in emissions from leaded fuel?
    - i. If so, what steps will be taken to eliminate the contamination resulting from leaded fuel?
      1. What is the detailed plan to eliminate the use of Leaded Fuel at Hanscom field?
2. Has Massport or any of the developers, their consultants, or other proponents been in contact with any property owners within a five-mile radius of the proposed North Airfield?
  - a. Have the proponents assessed the impact on property values for residents living near Hanscom Field due to this proposed development at North Airfield?
  - b. What steps will be taken to ensure no negative impact on persons living near Hanscom field because of the North Airfield development?
3. Who benefits from this proposed development besides private and corporate jet owners?
  - a. The proponents cite the issue of "decreased ferry flights," but no clear data has been offered to support this statement.
    - i. Please provide these data for the past two years.
  - b. Will this result in benefits to the surrounding residents?
  - c. Will there be an increase in tax revenue to the
    - i. Town of Bedford,
    - ii. Commonwealth of Massachusetts,
    - iii. Other governmental agencies?
  - d. How will this revenue be used to improve the quality of life of the people subject to the additional noise, vehicle traffic, and negative health effects from the added pollution?
4. Construction - What is the plan for constructing the North Airfield?
  - a. What is the proposed start and end date for construction?
  - b. How will construction-related environmental issues be addressed, such as noise, dust, earth moving and removal, water run-off, and related issues be handled?
  - c. Will construction vehicles be allowed to use Hartwell Road?
    - i. What are the hours when construction vehicles will be allowed on Hartwell Road?

- d. What precautions will ensure local residents and workers have safe access along Hartwell Road during construction?
- 5. Post-construction issues of concern.
  - a. What is the planned water consumption for the North Airfield?
    - i. Are current water mains of sufficient size to accommodate the water needs of the North Airfield project?
  - b. What will be the sewer demands from the North Airfield?
    - i. Are current sewer lines of sufficient capacity to accommodate the water needs of the North Airfield project?
    - ii. How will sewage be monitored to ensure no pollutants enter the wastewater system and result in added contamination?
  - c. Will there be a need to alter the electric supply system on or near the North Airfield?
    - i. Are current electric lines sufficient to handle the added electric demands?
    - ii. Will a sub-station need to be built to accommodate the electric demands?
  - d. Will there be a need for any communications towers over 20' used to support the proposed North Airfield?
  - e. Will any additional navigation facilities (radar, air navigation, landing systems, other) be included in the plans?
  - f. Are there ANY plans for the future expansion of Hanscom field beyond what is proposed for the North Airfield within the next 50 years?
    - i. Runway expansion?
    - ii. Taxiway expansion?
    - iii. Land acquisition?
    - iv. Storage facilities?
      - 1. Aircraft?
      - 2. Fuel?
    - v. Passenger terminal?
    - vi. Other?
- 6. TRAFFIC – Has a traffic study been completed to identify the increase in the number of vehicles?
  - a. VHB, the contractor for the North Airfield project, was also involved with the Werfen expansion. VHB submitted a report to the Town of Bedford in October 2022.
    - i. Did VHB know of or participate in the Werfen study AND the North Airfield study simultaneously, and if so, why was this not disclosed?
    - ii. Did VHB account for increased traffic on Hartwell Road when presenting the North Airfield study?
      - 1. VHB reported there would be about 355 parking spaces at Werfen, and based on a count of proposed parking spaces at the North Airfield, there will be an additional 230 parking spaces for a total of 585. When counting vehicles owned by residents on or adjacent to Hartwell Road and vehicles that use Hartwell Road as a bypass, the traffic volume may increase by at least 25%.
      - 2. The October 2022 report from VHB states:
        - 3.1.2 Site-Specific Growth**
        - In addition to accounting for background growth, the traffic associated with other planned developments within the seven-year horizon is accounted for in this analysis. Based on discussions with the Town, no planned development projects were identified in the vicinity of the study area.

- b. Will truck traffic be allowed to transit Hartwell Road?
  - i. What is the expected volume of added truck traffic?
  - ii. Is Hartwell Road built to accept the weight of the proposed truck traffic?
  - iii. What will be done to reduce the noise generated by the truck traffic not negatively impact residents living on or near Hartwell Road?
  - iv. Will a traffic light be installed at Hartwell Road and Rt. 62?
- 7. Informing the communities impacted by the proposed North Airfield.
  - a. What steps have been taken to inform the communities surrounding the Hanscom Field of the proposed addition of the North Airfield? Concord, Lexington, Lincoln, and Bedford.
  - b. What steps have been taken to inform those persons living within a five-mile radius of the proposed development at the North Airfield?

**From:** [Vicky Diadiuk](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Friday, February 10, 2023 3:53:01 PM

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HI,

The proposed expansion of Hanscom Field for private jets is idiotic!

Not even mentioning the deleterious effects on the neighborhoods & the Minuteman National Park which would be severely affected by more air traffic, private jets should be banned given the environmental harm they cause.

This is a perennial battle that has to be put to bed.

There should be no expansion for air travel period.

Respectfully,  
Vicky Diadiuk  
40 Morningside Ln  
Lincoln, MA 01773



**From:** [Adam Liberman](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Questions and Issues on the L.G. Hanscom Field North Airfield Development Project (EEA# 16654)  
**Date:** Saturday, February 11, 2023 5:38:14 PM  
**Attachments:** [North Airfield Comments - Adam Liberman - 02112023.pdf](#)

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Dear Mr. Strycky,

I have attached my questions and issues related to the North Airfield Project at Hanscom Field.

Please verify receipt and the ability to view the attached PDF.  
(I converted from MS Word and want to ensure you can open it as well)

If you have any questions please don't hesitate to contact me. I suspect some of the questions have answers readily available and others do not.

Thank you,

Adam

**Adam Liberman**

**94 Kendall Court**

**Bedford, MA 01730**

**781-883-1632**

**[adammarkliberman@gmail.com](mailto:adammarkliberman@gmail.com)**

Adam Liberman  
94 Kendall Court  
Bedford, MA 01730  
adammarkliberman@gmail.com

I have documented below a specific of issues and concerns regarding the proposed L.G. Hanscom Field North Airfield Development Project (EEA# 16654). As a resident of the Hartwell Farms Community (that resides approximately 1000-1200 feet away from the proposed expansion) there are significant concerns as to how this expansion will impact the quality of the residents' lives. Please note that this is my personal list and does not represent all the concerns and issues that have already or will be raised by other residents.

1. FUEL (The latest project proposal indicates a new aircraft "Fuel Farm").

- a. It was proposed originally that fuel arrival would take place from an entrance other than off Hartwell Road and trucked to the Fuel Farm. Will this be a required or optional for fueling storage tanks?
- b. How will fuel spillage be managed at the Fuel Farm?
- c. What steps will be taken to prevent the fuel from spilling and leaking into the groundwater?
- d. Will plane washing or de-icing be allowed at the new North Airfield?
- e. How will water from plane washing be handled to avoid runoff and entry into the local groundwater?
- f. Is there a commitment for recurring testing of local ground water in perpetuity?
  - i. If not, then why not?

2. NOISE

- a. What steps will be taken to limit noise from aircrafts while at the North Airfield?
- b. What restrictions will be in place?
- c. What hours of the day can engine fire ups take place?
- d. What will be the net effect of noise (decibel levels) for the Hartwell Community (~1000 feet away) and Edge Sports Complex outdoor fields (~400 feet away)?
- e. The proposal indicates that L-1011 jets may be housed... what are the decibel levels produced by those versus the smaller Learjets mostly currently in use?
- f. Will there be any additional flight patterns (including those over Hartwell Farms or Edge Sports Complex) allowed?
- g. How many engine fire-ups are we expecting on a daily basis both initially and when fully utilized?
- h. Is there a commitment for recurring testing of noise pollution in perpetuity?
  - i. If not, then why not?

3. AIR AND EMISSIONS

The proposal states *"With regard to aircraft activity, the Project would result in environmental benefits associated with reduced air emissions by reducing overall aircraft trips"*

- a. What is the volume of daily ferry trips currently? (Please provide at least 1 year of data)
- b. What percentage of the proposed 50-80 corporate jet hangar capability does that cover?
  - i. Are we really reducing flights overall long term... or just initially but really have a net addition once fully utilized?
- c. Is there a commitment for recurring testing of air pollution in perpetuity?
  - i. If not, then why not?

#### 4. TRAFFIC

- a. Has a traffic study been completed to identify the increase in the number of vehicles on Hartwell Road?
  - i. If so, did it consider the increase in traffic already assumed via the Werfen expansion.
- b. VHB, the contractor for the North Airfield project, was also involved with the Werfen expansion. VHB submitted a report to the Town of Bedford in October 2022 and that Werfen expansion report indicates *“In addition to accounting for background growth, the traffic associated with other planned developments within the seven-year horizon is accounted for in this analysis. Based on discussions with the Town, no planned development projects were identified in the vicinity of the study area.”* Given that VHB is the contractor for both projects, it suggests that either VHB knew of this expansion and accounted for it (but wasn't forthcoming in the report) or that the analysis for Werfen is invalid given this proposal and needs to be redone with this new potential project in consideration.
  - i. What is the reconciliation of this disconnect? (Given VHB is the contractor they can surely respond).
- c. Will related truck traffic (for maintenance, etc.) be allowed on Hartwell Road?
  - i. If so, what is the expected volume of added truck traffic?
  - ii. If so, what will be done to reduce the noise generated by the truck traffic not negatively impacting residents living on or near Hartwell Road?

#### 5. CONSTRUCTION PERIOD

- a. What is the proposed start and end date for construction?
- b. What hours is construction limited to (i.e. daytime only)?
- c. How will construction-related environmental issues be addressed, such as noise, dust, earth moving and removal, water run-off, and related issues be handled?
- d. Will construction vehicles be allowed to use Hartwell Road?
  - i. If so, what are the hours when construction vehicles will be allowed on Hartwell Road?

#### 6. GENERAL

- a. Who benefits from this proposed development besides private and corporate jet owners? (Excluding of course the financial benefits for the Developer and Massport)
- b. Are there any benefits for local residents or those in surrounding communities?
- c. Is there an increase in tax revenue to the Town of Bedford or state of Massachusetts
  - i. If so, how does this offset the clear negative quality of life impact to the people subjected to the impact of multi years of construction and increase in noise and air pollution once operational?

**From:** [Tingley, Dustin](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Saturday, February 11, 2023 10:22:32 AM

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Dear Colleague,

I have read the proposal for this. I would think much more definitive evidence for this not increasing--and in fact decreasing--the number of flights should be provided. To date flights have only increased, and increasing the number of hangers could implicate other things than just 'ferry flights'.

best,  
Dustin

--

Dustin Tingley  
Professor of Government  
Deputy Vice Provost for Advances in Learning  
Harvard University  
[scholar.harvard.edu/dtingley](https://scholar.harvard.edu/dtingley)  
[vpal.harvard.edu](https://vpal.harvard.edu)

Check out [link.harvard.edu](https://link.harvard.edu)

**From:** [ELAINE JONES](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Re: Hanscom expansion  
**Date:** Saturday, February 11, 2023 8:17:40 PM

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I tried to read the report on expansion at Hanscom, but as I am an ordinary person who is unable to really comprehend the report, other than such expansion, 27 hangars, is unreal!!! That such expansion would not increase flights in and out is absurd. Increase in noise, air pollution, traffic, etc. is quite obvious.

I am against this plan for expansion.

Elaine Jones, 18 Reeves Road, Bedford, MA 01730

On Saturday, February 11, 2023 at 07:37:16 PM EST, ELAINE JONES <laney.lou5@verizon.net> wrote:

I tried to read report on planned expansion of Hanscom, but just an ordinary person who is unable to understand the report, other than such expansion, 27 hangars. is unreal! This has to be a joke!! That such expansion would not increase flights in and out is absurd. Increase in noise, air pollution, traffic, etc is quite obvious.

I am against this plan.

Elaine Jones, 18 Reeves Road, Bedford, MA 01730

**From:** [Heather Packard](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [mike.barrett@masenate.gov](mailto:mike.barrett@masenate.gov); [carmine.gentile@mahouse.gov](mailto:carmine.gentile@mahouse.gov)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Saturday, February 11, 2023 11:20:06 AM

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Hello Mr. Strysky,

I have serious concerns about the plans to expand Hanscom North Airfield. I live in Concord, MA abutting Great Meadows Wildlife Refuge.

The proposed development may have far-reaching effects, given that Hanscom Field civil airport is located adjacent to Minute Man National Historical Park, near Great Meadows National Wildlife Refuge, and is surrounded by thousands of historic sites in four that millions of people visit every year to experience living history and the peace of the natural world. For decades, Hanscom-area residents and their elected town and state representatives have worked diligently to balance the needs of the airport with the need to protect these irreplaceable resources and the surrounding neighborhoods from the adverse effect of the continuous expansion of the airport.

Incredibly and confounding all common sense, the proponent argues without evidence that the resulting massive expansion of air traffic will reduce environmental impact and help achieve a net zero goal. According to European NGO Transport & Environment (T&E), private jets are five to 14 times more polluting than commercial planes per passenger, and 50 times more than high-speed rail, emitting two tonnes of CO2 in a single hour. At a time when we are all trying to minimize our carbon footprint and to live more sustainably to ensure a better future for our children, an expansion of private jet use is a step in the wrong direction.

In addition, given that Hanscom is a former super fund site there is the additional risk that any construction could expose and releases toxic chemicals.

Therefore, I oppose the proposal to expand Hanscom North Airfield.

Thank you,

Heather Packard  
38 Black Duck Road  
Concord, MA 01742

--

Heather Packard (she/her)

Cell #508-414-6040

[linkedin.com/in/heather-packard](https://www.linkedin.com/in/heather-packard)

**From:** [Josh Newman](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Saturday, February 11, 2023 9:35:23 PM

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Dear Mr. Stryisky,

I'm writing to you regarding the proposed Massport development of 27 new jet aircraft hangers in Bedford, MA just off Hartwell Rd. I'm a resident in the Hartwell Farms Condominium Association and am deeply concerned with this proposal. My wife and I moved to Hartwell Farms in July 2021 with our 2 young boys who are now 3 1/2 years old and 16 months old. We initially gave pause to purchasing our property due to its proximity to Hanscom Air Force Base. However, after seeing how many families with young children lived in this community and how kids were constantly playing outside in the nearby field, we felt that this would be a great place to raise our kids despite the fact that the noise from the Base was far from ideal.

The proposal for these hangers could allow as many to 50-80 additional corporate jets that will be dangerously close to our properties and outdoor play areas. I find it grossly irresponsible for this project to even be considered by the MA Environmental Protection Agency. Massachusetts is supposed to be a leader in fighting climate change and at the forefront in trying to improve our environment. In addition to the increased noise, toxic exhaust fumes that will be constantly emitted from the idling and taxiing planes, there is the proposal for a fuel farm right by Hartwell Rd. With all the added asphalt, the runoff of fuel into our groundwater will be an absolute certainty. I'd like to know how many people involved in proposing and approving this project would support it if this was in their own backyard?

This proposed development sadly speaks to the growing disconnect of people in our country who have more money than they know what to do with, and have little regard for how their actions effect anyone else. The people behind it clearly feel the convenience of those who can afford to fly on private corporate jets overrides our commitment to the environment. Equally important, they either don't care or are oblivious to the impact this project will have on the immediate and long term health and safety of young children, older adults and everyone in between.

Had my wife and I known that this project was going to take place, I can 100% guarantee you that we never would have bought our property on Kendall Court, which is part of the Hartwell Farms Association. In addition to all of the health effects, it will all but guarantee a drastic lowering of our property value.

I respectfully plead with you to do all that you can to put a stop to this project.

Joshua Newman  
55 Kendall Court  
Bedford, MA 01730

Sent from my iPad



**From:** [Roy McCloskey](#)  
**To:** [Stryky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Saturday, February 11, 2023 5:18:14 PM

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Almost all residents of the towns surrounding Hanscom will NOT be in favor of this Development for many reasons: count me among them.

It would be detrimental to the quality of life in the entire area.

Please do not go ahead with this project

Roy McCloskey  
8 Linmoor Terrace  
Lexington Ma 02420

**From:** [susan jancourtz](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Saturday, February 11, 2023 11:27:00 AM

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Dear Sir:

Please do NOT allow this project to go forward. For the developers to claim this is environmentally helpful is patently absurd—how can more private jets for the 1%, flying into and out of this facility, possibly HELP the environment?

The argument that flights will be reduced if hangar space is available for planes bringing in spare parts and people is also ridiculous. How many days would such planes have to park at Hanscom if they wanted to wait for the next payload? And do they need 27 parking spaces? I doubt it—those hangar spots will be used for the 1% to house their planes.

I live on the flight path from Hanscom. In good weather, I find it difficult to enjoy my backyard because of the screaming aircraft overhead. It's OK, I knew it was there when I moved here. But increasing the traffic to make it more convenient for the rich, and dumping more pollutants into the environment while claiming they'll be helping? it's an insult to my intelligence.

I know Logan needs more capacity. Use Worcester or Manchester, where the local population might actually welcome more business and jobs. We in Concord do not.

Sincerely,

Susan Jancourtz  
30 Court Lane  
Concord, MA 01742

**From:** [Walter Gillett](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Saturday, February 11, 2023 6:10:47 PM

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Hi Mr Strycky,

I'm writing to oppose the planned addition of 27 hangars at Hanscom. At a time when climate change is threatening to destroy the planet, the last thing we need is to add lots of new CO2-spewing jet traffic. Best,

Walter Gillett  
103 Cedar St  
Lexington, MA 02421  
701.732.0509

**From:** [Bija Satterlee](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [<fjonath7@gmail.com>](mailto:fjonath7@gmail.com)  
**Subject:** Hanscom Field Project: We OPPOSE  
**Date:** Sunday, February 12, 2023 12:49:45 PM

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Dear Alexander

We are writing to let you know that as residents of Concord, and who live in the direct flight path to Hanscom airfield, we are opposed to the development of that area which is being discussed and proposed right now.

For every reason which has been discussed: environmental, noise, additional planes and size of planes, impervious surface expansion, environmental justice, serving only high net worth individuals and corporate elite transportation obsession, we will oppose this at every turn.

Our historic town with nature, peace and quiet is constantly under threat by DEVELOPMENT. We moved here because it is historic and serene, and we will fight to preserve it as long as we live here.

There were FOUR bald eagles circling over great meadows yesterday, at the beginning of nesting season. A symbol of American Freedom. Rare to see them here! How ironic that they are being found poisoned by environmental toxins, and driven away from potential nesting sites because of DEVELOPMENT.

Enough already !!

Concord defeated airport expansion in the past and we will fight it any time it is brought up.

There is a HUGE network of people in Bedford and Concord who defeated a proposed paved bike path recently. The state money was ready, the bulldozers were ready, then an unprecedented number of residents showed up at Town Meeting and defeated the entire plan.

I hope you pass this along, and thank you.

It is not about negotiating a tweak here and a tweak there. We are 100% opposed to this expansion/development, period.

Bija Satterlee  
Historic Concord Massachusetts

--

Bija Satterlee  
TheSatterleeGroup.com  
Leading Edge Real Estate  
781-354-4835  
(Sent from iPhone)

**From:** [BROOKS STEVENS](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** I am against adding 27 new hangers to Hanscom AFB  
**Date:** Sunday, February 12, 2023 8:43:56 AM

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I live nearby and the air pollution caused by increased air traffic will be bad for myself, my family, and my neighbors.

Brooks Stevens  
55 Elm Brook Ln  
Concord MA 01742

**From:** [BROOKS STEVENS](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654  
**Date:** Sunday, February 12, 2023 4:51:43 PM

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I oppose adding more hangers at Hanscom AFB because of increased air pollution to me and my neighbors near by.  
Brooks Stevens  
55 Elm Brook Ln  
Concord MA 01742

**From:** [Parmelee](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Sunday, February 12, 2023 8:20:30 PM

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I'm indignant and astounded that there are plans to expand Hanscom airport. Any such development runs counter to our understanding of the effects of air flight on global warming. We should be doing everything in our power to cut back, not expand.

Furthermore, I read in the Globe that Magellan Jets, a private jet company, is planning to open at Hanscom. I find that outrageous!

Please block this from happening.

Thank you,  
Catherine Parmelee  
31 King Lane

**From:** [Dan Schrager](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [mjohnson@concordma.gov](mailto:mjohnson@concordma.gov); [Erin Stevens](#); [mrasmussen@concordma.gov](mailto:mrasmussen@concordma.gov); [lescobedo@concordma.gov](mailto:lescobedo@concordma.gov); [Hoffer, Melissa \(GOV\)](#)  
**Subject:** LG Hanscom Field -North Airfield hangar development  
**Date:** Sunday, February 12, 2023 10:33:18 AM

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February 11, 2023

Mr. Alexander Strysky, MEPA Office -email  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: North Airfield Hangar Development Proposal

Dear Mr. Strysky:

I am writing in strong opposition to the proposed 49 acre North Airfield hangar development proposed by Runway Realty Ventures, LLC and North Airfield Ventures, LLC in their January 23, 2003 ENF.

The premise of this project is that it will result in a net benefit to the environment by limiting the number of ferry flights required by aircraft due to insufficient space currently available at Hanscom Field.

The proponent has provided no evidence that this primary premise of their rationale for development is valid.

As a long time user of Hanscom Field and a long time Massport business tenant, I find this premise to be totally inaccurate. Over the 35 years I've worked at and flown out of Hanscom, I've seen the growth of corporate jet operations at the airport, however the expansion of the three FBO's over that same time has largely kept pace with the hangar requirements for based aircraft.

I assert that much of the increase in turbine traffic using the airport is flown by fractional operators such as NetJets, Flexjets, Planesense, Wheels Up, etc. The business model of these operations precludes them from flying excessive ferry flights as the aircraft only make money for the operators when they are flying.

The fractional operators drop their passengers and leave Hanscom to pick up their next passengers as efficiently as possible. If they need to be hangared at Hanscom, that costs the operators lots of money. It's analogous to a taxi waiting for a rider rather than picking up the next fare and generating more revenue.

One can posit that these proposed hangars rather than decreasing ferry flights, will instead encourage more operators to base at Hanscom. The cost of this enticement in environmental terms is massive and in direct contradiction to Massport's own Master Plan of 1978. It also goes directly counter to Massport's commitment to have zero greenhouse gas impacts by 2031; a commitment the proponent even cites in their ENF.

To make matters even worse, this development is designed to attract category 4 large aircraft. These aircraft have a far greater carbon footprint and are incompatible with the type of aircraft Hanscom generally serves.

The environmental impacts of this development are an additional blight upon this largely suburban to rural environment. Not only will this development add parking for 240 cars, it will pave over 39 acres of land that's currently woodlands and wildlife habitats. While the proponent makes a case that they will be LEED gold certified,



install solar panels and plan for stormwater runoff, it is impossible to make a case that paving 39 acres will improve flooding risks for an area already at high risk of urban flooding. The impacts upon a largely wooded suburban environment are tremendously negative.

As you should also be aware, Atlantic Aviation, one of the FBO's on the field is in the midst of a large hangar building development at the Pine Hill hangar site. That new hangar space will already increase the amount of hangaring for based aircraft in keeping with the demand.

In summary, the primary premise used by the proponent as the rationale for building these hangars; ie. It will decrease the amount of flights has absolutely no basis in the data. Aircraft don't generally drop their passengers and fly off to Logan to wait for their passengers to ask them to come pick them up. Rather, with three large national FBO's on the field, they will either get temporary hangaring space or tie down on the ramp. Since fractional operators run so many of the turbine flights in and out of Hanscom, the need for them to hangar is limited.

If this \$112,000,000 hangar, taxiway expansion is allowed to proceed, it would be tone deaf to the stated goals of Massport, the governor's office and the national messaging regarding climate change.

If an occasional operator needs to hangar an aircraft for several days, Massport has an ideal solution already as the Worcester airport, also run by Massport, is highly underutilized and it could use the business. It should also be noted that a plane departing Hanscom on a ferry flight for that purpose would be light and quiet and would climb quickly with a minimal impact on the environment. It's difficult to fathom a rationale that favors paving over 39 acres, destroys natural watershed and habitat to prevent that occasional flight.

No, this project will greatly damage the Hanscom area as it will attract new traffic. On behalf of my neighborhood, the other users of Hanscom and the greater good, please do not permit this project to proceed.

Sincerely,

Daniel L. Schrager  
24 Mallard Dr., Concord, MA 01742

cc: Concord Select Board, Matthew Johnson, chair  
Erin Stevens, Transportation and Mobility Planner, Concord  
Office of Governor Maura Healy  
Marcia Rasmussen, Director DPLM  
HATS, Linda Escobedo, Concord liaison  
Melissa Hoffer, MA Climate Chief

**From:** [Pilbeam, David](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Sunday, February 12, 2023 8:25:35 PM  
**Attachments:** [North Airfield Ventures.docx](#)

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**EEA #16654: L.G. Hanscom Field North Airfield Development ENF**

Dear Mr Strysky

We have some comments on the proposal from North Airfield Ventures, LLC and Runway Realty Ventures, LLC (the “Proponent”) for the for the L.G. Hanscom Field North Airfield Development (the “Project”), attached to the Environmental Notification Form (ENF) for the L.G. Hanscom Field North Airfield Development. The Project involves the addition of twenty-seven purpose-built hangars for aircraft parking and storage on-airport at Hanscom.

We write as residents of Lexington, a community falling within the five-mile “impact radius” of Hanscom.

As noted in the proposal, the plans are to “construct, operate, and maintain a master development of corporate hangars at Hanscom Field (“Hanscom,” or the “Airport”), which will “support current aviation activity **and accommodate future demand**”. That last phrase contradicts the promise of no significantly increased activity, which contradiction is further emphasized given that “The Project is **designed to maximize aviation use on the North Airfield** and Navy Parcel”.

This maximizing is purportedly “offset” by claiming the Project will be “**minimizing visual impacts on adjacent sites and the surrounding community**”, because “**hangar development has been set back from Hartwell Road**”. There are no immediate neighbors who might be impacted. Indeed, other than those driving down Hartwell Road to work at or use the airfield, no-one would be able see these new hangars. It is simply not supportable to claim that “minimizing” non-existent visual impacts even remotely offsets the “maximizing” effects on noise pollution of increased usage.

Regardless of where one lives, not only within the five-mile-radius, the proposal adds significantly to the frequency of flights, both night-time as well as day-time, and hence to the current frequently excessive levels of noise pollution. At this moment there is no effective system for responding to residents’ complaints, nor is there any mention in the proposal on how those might be addressed.

We strongly urge rejection of this proposal. It entirely avoids the real effects of such an expansion, which will be considerable and negative.

Yours sincerely,

David Pilbeam and Maryellen Ruvolo

8 Johnson Farm Road  
Lexington

**From:** [MEPA \(EEA\)](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Fw: Proposed Hanscom Expansion  
**Date:** Monday, February 13, 2023 8:39:35 PM

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**From:** Schwalbert, Nick (EEA) <nick.schwalbert@mass.gov> on behalf of internet, env (EEA) <env.internet@mass.gov>

**Sent:** Monday, February 13, 2023 8:42 AM

**To:** MEPA (EEA) <mepa@mass.gov>

**Subject:** FW: Proposed Hanscom Expansion

FYI

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**From:** Emma Melton <emmamelton@gmail.com>

**Sent:** Sunday, February 12, 2023 8:05 PM

**To:** internet, env (EEA) <env.internet@mass.gov>

**Subject:** Proposed Hanscom Expansion

**CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

Dear Secretary Tepper,

I write as a concerned resident of Lincoln regarding the proposed north airfield development at Hanscom. I attended the recent MEPA zoom webinar and was shocked to hear that the project is being touted as a benefit for the environment by citing a convoluted and unsupported argument about decreased "ferry fights."

This project would unequivocally increase the number of private jets and the resulting carbon emissions in the Commonwealth, at a time when many citizens are spending money, time, and effort to reduce their carbon footprint in even small ways. The project directly counteracts initiatives and commitments of the state government to lower or counteract such emissions. Support of this Hanscom expansion is entirely untenable.

As an extremely concerned constituent, I ask that you do everything in your power to stop this development.

Warm regards,  
Emma Melton

**From:** [Heidi Kaiter](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** I am against adding 27 new hangars to Hanscom Air Force Base  
**Date:** Sunday, February 12, 2023 9:44:19 AM

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Alexander et. al.

Poisoning the air is criminal.

The town of Concord and surrounding communities will be further poisoned by chemical spray if this plan proceeds.

My neighbors are outraged. Stop the proposed plan to add 27 new hangars to Hanscom Air Force Base.

Is this what you want on your conscience? I hope not.

Heidi Kaiter  
Elm Brook Lane  
Concord, MA 01742

**From:** [Annamaria San Antonio](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Sunday, February 12, 2023 11:08:53 PM

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Dear Alexander,

As a health professional, and Lincoln resident, I am writing to oppose the [North Airfield Development ENF](#), project currently under review.

The proponents of the project do not account for the enormous social, environmental, and health impacts of the proposed expansion. Real and considerable health impacts that this expansion will introduce are left unacknowledged from the developers' ENF, outcomes which will be a direct result of its stated purpose to "support current aviation activity and accommodate future demand". I ask, "at what cost to civilian health, the environment, quality of life in the areas in which the expansion is sought?"

I am very concerned about this expansion on the basis of several standpoints. One such major concern is the increased pollution that this expansion would introduce into the air. Air pollution is a known major risk factor for health, associated with poor health outcomes and causing illness from stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases, including asthma. I offer this study for consideration of my concerns:

*A review of health effects associated with exposure to jet engine emissions in and around airports:*

<https://ehjournal.biomedcentral.com/articles/10.1186/s12940-020-00690-y>

"People who live within six miles [of an airport] have higher levels of asthma and heart problems,"

In another study, animals exposed to aircraft noise experienced increased blood pressure, endothelial dysfunction, and other cardiovascular outcomes that weren't observed in a control group exposed to white noise.

<https://www.sciencedirect.com/science/article/pii/S0735109717419309>

I am further concerned about the increase in noise pollution associated with this proposed growth. Noise is not just a nuisance; it presents health risks. Airport noise can place nearby residents at a greater risk for cardiovascular disease – among other severe health risks. In one report, researchers found the risk was greatest in the population exposed to the highest levels of noise. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6541745/>

The proximity of the proposed site to Minuteman National Park cannot be overlooked and an expansion would further negatively impact the park. This natural resource is being threatened already with aviation activity at Hanscom, burgeoning development, and constant increase in highway traffic on Routes 2A and Route 2. Surrounding neighborhoods, that are now adjacent to the vacant unoccupied former Navy parcel lot with groves of trees nearby, will in the future be exposed to exponentially increased aviation activity – idling, run-offs, taxi-ing, de-icing-- in even closer proximity to what they now endure.

It is now an accepted fact that global warming, and the degradation of our planet and its natural resources is greatly accelerated by industry of all sorts. It seems to me that this project and others like it fall into the category of “unnecessary” - that the damage to our communities and environments, do not in any way justify its supposed benefits.

Moreover, claims of the projects’ “environmental benefits associated with reduced air emissions by reducing overall aircraft trips”, are false. This expansion would open the door for increase aviation activity in numerous ways with immeasurable negative environmental impact and potentially increasing all of the health risks I have been outlining here - and then some.

It is estimated that the aviation industry accounts for approximately 2.5% of global greenhouse gas (GHG) emissions in 2018 (IEA 2019), but that estimate excludes the impacts from airport construction and operation. An analysis of 2019 data for San Francisco International Airport (SFO 2018, 2020) reveals an approximate annual breakdown of 85% for aviation GHG emissions and 15% for airport GHG emissions. Airport construction and operation also results in emissions of air pollutants such as carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and particulate matter (PM), displacement of and damage to natural ecosystems, generation of waste, and consumption of resources such as water.

Characterizing this expansion as somehow supportive of sustainability and Massport's Net Zero goal by 2031 by virtue of its infrastructure being built with energy efficiency, seems grossly misleading when the increase in private jet and aircraft operations will contribute hugely to greenhouse gas emissions in such a way as to totally nullify any energy efficiency in its design and construction.

I cite this article: <https://tinyurl.com/mttxzhrh> *Airports and environmental sustainability: a comprehensive review* Fiona Greer et al 2020 Environ. Res. Lett. 15 103007

Given all of these impacts, it is very hard to agree how such an expansion would be beneficial to all but the interests of private industry. I request that the Developers provide an explanation for each of my points above, with a focus on how the information in their ENF is so vastly disparate from the body of commonly known and accepted literature cited above.

**Thank you,**

~Jai Kaur Annamaria San Antonio LCMT, CLT, NCTMB, E-RYT500

**Massage+Yoga+Ayurveda**

*Achieving Wellness through Body/Mind/Spirit Synergy*

PO Box 456 Lincoln, MA 01773

C: 781.738.1920

[asanajai@verizon.net](mailto:asanajai@verizon.net)



**From:** [jcm02129@mac.com](mailto:jcm02129@mac.com)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion  
**Date:** Sunday, February 12, 2023 6:32:37 PM

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Dear Mr. Strysky,

I am writing to voice my strong opposition the proposed expansion of Hanscom Field on several grounds.

First of all, there are environmental concerns from paving over and building on a significant are of the airfield and also building as many as 24 new hangars. This increase in infrastructure and impermeable surfaces will likely have a deleterious effect on water quality and the loss of open space will reduce biodiversity on the site.

Second, and possibly most importantly, we are in severe danger of reaching tipping points that will further damage climate stability if temperatures rise more than the 1.5°C threshold. Air travel, particularly in small private planes, is one of the worst offenders in terms of producing greenhouse gases and we should be finding ways to reduce our dependence on air travel, not expanding it.

And third, Hanscom Field is adjacent to a historical National Park and is surrounded by residential as well as commercial areas. Already, those in the flight paths from Hanscom are plagued by noise, which interferes with the ability of residents to enjoy their own back yards. They do not need or want more noise pollution. The expansion would also likely have a deleterious effect on the Wildlife Refuge on the Concord River, which would be disturbed by the noise and pollution from the planes.

This is not the first time that attempts have been made to expand the facilities at Hanscom Field. They have been rejected in the past and I implore you to reject this application as well.

Sincerely,

Janet C Miller  
1647 Main St  
Concord MA 01742

**From:** [Kate Kavanagh](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** No on Hanscom expansion  
**Date:** Sunday, February 12, 2023 9:03:38 PM

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Please no.

I don't buy the argument in favor.

Enough.

Kate Kavanagh  
409 Old Bedford Rd  
Concord

Sent from my iPhone

**From:** [Laurie O'Neill](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** re: Hanscom expansion proposal  
**Date:** Sunday, February 12, 2023 3:32:36 PM

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Dear Mr. Strysky,

We are Concord residents--I am a writer and journalist and my husband is a scientist at Harvard-- who live on a hill off of Lexington Road and therefore are impacted significantly by air traffic from Hanscom.

We are concerned about the expansion proposal and have a few questions:

1. The project would promote carbon emitting private and corporate jet travel at a time when the state and country are working to reduce such emissions.

This seems like a contradiction. *How will creating additional hangers decrease air traffic, as has been reported? How will it reduce air traffic?*

2. We have noticed an uptick in air traffic, particularly in spring, summer, and fall. *Are the number of private and corporate jet take-offs and landings controlled/limited?* They are nearly nonstop over long weekends in summer, when private jet owners are likely going away for the weekend. It is so noisy and frequent sometimes that we cannot hear each other talk when outside.

3. *Are private and corporate jets allowed to take off and land in the middle of the night or before 6 in the morning?* We have been noticing more of this. Perhaps these are military aircraft?

Thank you,

Laurie O'Neill and Dr. George Lauder

**Laurie O'Neill**

**[loneill123@gmail.com](mailto:loneill123@gmail.com)**



**From:** [Marian Hobbs](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion  
**Date:** Sunday, February 12, 2023 4:33:11 PM

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Expansion of Hanscom and the destruction of a mature forest for paving is an outrageous proposition - to impair our health and future well-being for the convenience of corporate jet users is a terrible, awful proposition. Has anyone looked to other locations in the Greater Boston area?

**From:** [Tom Flannery](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Additional Question  
**Date:** Sunday, February 12, 2023 3:47:32 PM

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**Please add this to the list of questions/issues I sent previously:**

**Will the project adhere to the “Dark Sky Initiative” to eliminate light pollution and light spilling onto the surrounding property?**

[Thomas P. Flannery, Ph.D.](#)  
[93 Kendall Court](#)  
[Bedford, MA 01730](#)  
[+1 781 608 7031 \(C\)](#)

**From:** [Wendy Reasenberg](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hansom Field Proposal  
**Date:** Sunday, February 12, 2023 8:04:41 PM

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I was pleased to see the alleged attention paid to environmental factors but the report only asks about what is on the property versus what is in the flight path or abutting. The Minute Man National Park and the Great Meadows Wildlife Refuge for example are in the flight path. The report should specifically address the effect on those valuable properties.

Aircraft noise from the airfield, both day and night, continues to be a problem for surrounding residents despite the fact that the military has wound down. Particularly offensive are the convertible helicopters.

From the report summary, "the Project would result in environmental benefits associated with reduced air emissions by reducing overall aircraft trips. Currently, aircraft fly in and out empty to pick up and drop off aircraft operators who cannot secure aircraft storage space at Hanscom, as well as employees of Massachusetts-based companies located in close proximity to the Airport. This practice results in extra flights (referred to as "ferry flights") that would otherwise not be required with aircraft stored at Hanscom. By providing aircraft parking and storage on-airport, the Project will relieve pressure from Logan in accordance with Massport's long-term planning objective aimed at using regional airports to satisfy the current and future demand for general aviation services."

This makes it sound as if it will reduce flights but actually it will only be a little more efficient. Why can't they drive in versus fly in? The report is cleverly worded to disguise the fact that aircraft activity has greatly expanded and the place is really busting at the seams. The impervious surfaces will be greatly expanded and it says nothing of how much woodland will be destroyed. Also, in previous discussions with the surrounding communities over the past years, my understanding was that the air activity would be reduced in favor of more industrial high tech activity at the base. This report assumes that general aviation is Hanscom's mission.

We all are now facing a current, serious existential threat with regard to climate change. Some feel that we are close to the irreversible tipping point. We have to reduce aircraft use, which is a major user of fossil fuels. Short term flights are efficient for the operator but they are inefficient with regard to fossil fuel use.

Logan's master plan focuses on Logan's needs and ignores the prospective negative impact on the communities surrounding Hansom Field. These are our country's most sacred historic areas with important history that existed almost 200 years before Hanscom was built. The proposed expansion will benefit the privileged few at the expense of the general public. I am opposed to this plan.

Wendy Reasenberg  
16 Garfield Street  
Lexington, MA





**From:** [Carol](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA#16654: L.G.Hanscom Field North Airfield Development ENE  
**Date:** Monday, February 13, 2023 11:18:23 AM

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To Alexander Strysky

EEA#16654: L.G.Hanscom Field North Airfield Development ENE

There are many critical reasons to cite in opposition to Massport's latest unconscionable and irresponsible Hanscom expansion plan; most importantly environmental issues, historical and cultural resources, and the desires of the surrounding communities. To quote Senator Mike Barrett, "It is striking that in the middle of our attempt as a state to deal with an existential crisis, Massport is intent on building its private jet business....This is premium traffic at a huge environmental cost to all of us collectively." With this development proposal, the future of the Hanscom communities and the unique historic, natural, and cultural resources they contain is in question. We urge careful, reasoned reconsideration with community input before any future plans are developed.

Carol and David Haines  
595 Old Bedford Road, Concord, MA 01742

Sent from my iPad

**From:** [Richard Baughman](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [mike.barrett@masenate.gov](mailto:mike.barrett@masenate.gov); [kenneth.gordon@mahouse.gov](mailto:kenneth.gordon@mahouse.gov)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 10:28:33 PM  
**Attachments:** [scan.pdf](#)

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I am writing as a Board member (treasurer) of the Hartwell Farms Condominium HOA. The community wishes to express its strong opposition to this project, as immediate abutters (1,000' from the North Airfield border). We have circulated a petition over the past few days and received 100% signatures for the petition for every unit we could reach (we have 75 units total and collected 105 signatures). The petition signatures are attached.

The unprecedented scope of the project:

1. The developer proposes to add **27 jet aircraft hangars**, office space, two parking lots, and a huge amount of (asphalt) ramp space immediately adjacent to Werfen (which is already undergoing expansion & adding a parking garage), and extending up the airfield side of Hartwell Road over the hill past The Edge and the old abandoned Raytheon building (which is on the left).
2. This will allow as many as **50-80 additional corporate jets** to be housed at Hanscom, from 8-passenger Learjets to much larger tri-jets like an L-1011 (175' wingspan). By Massport's own admission, these hangars are all designed for private corporate clients to provide "a more comfortable flying experience" away from the public.
3. The project size is breathtaking: an 80% increase in corporate hangar space at Hanscom over the existing three providers of these services.
  - 50 acres (88 football fields) total project area
  - 11 acres (20 football fields) of jet hangar space (half a million sq ft); multiple jets per hangar
  - 39 acres (70 football fields) of impervious surfaces (concrete, asphalt, and buildings), an increase of over 2.5 times the current (unused) paved ramp area
  - Aircraft refueling (fuel storage) right off Hartwell Road
  - Two road entrances to the development off Hartwell Road, increasing the traffic on this small road
  - Refurbishment of the huge Navy Hangar for restoring hangar use

Here are our primary concerns and comments regarding this project, and why we totally opposed it:

1. Increased jet traffic, carbon & poisonous gas emissions, and noise, including jet engine startups. (All of that currently occurs across the airfield on the south (2A) side of the airport.) Massport says "not much change is expected"

in traffic as these hangars will eliminate 'ferry flights' of empty jets to get them to Hanscom when they have to be based elsewhere. This initial proposal has no documentation of this (not even a count of existing ferry flights), and the statement strains credibility.

2. There will be aircraft refueling (possibly with underground tanks) yards away from Hartwell Road.
3. There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced.
4. A huge amount of forest with mature trees will be cleared and paved over.
5. There will be increased road traffic (including trucks) during construction and after.
6. This is solely for the benefit of wealthy corporate executives and companies that can afford to buy and use private jets.
7. There may be fueling trucks driving on Hartwell Road, as Massport has not committed to preventing this. It has only vaguely stated its "intention" and has no firm requirement to keep the refueling trucks within airport property. The rep for the property developer said "the *intent*" is to have them [the fueling trucks] travel over to the North Airfield area from the current operations on the south side of the field.
8. There will be health and safety effects to our children and us, living so close to the airport, both in our development and for all those kids playing on The Edge fields.
9. There will be huge water runoff in storms (with some fuel contamination) without a clear indication of how this will be mitigated.
10. There will be "heat island" effects - with all the increased paving and buildings, there will be a huge amount of heat produced (and absorbed/retained at night) by the pavement and buildings, plus the loss of natural cooling that the forest currently provides.

Sincerely,

Richard Baughman, Treasurer, Hartwell Farms Board of Trustees  
63 Kendall Court  
Bedford MA 01730

**From:** [Adrienne Kimmell](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Bedford / Hanscom proposed expansion  
**Date:** Monday, February 13, 2023 2:58:49 PM

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Dear Mr. Strysky,

I'm writing to formally submit my objection to MassPort expanding the Hanscom jet hangar space in Bedford. This project will result in increased carbon and gas emissions, clearing forests and trees, as well as increased road traffic during construction. As a community, our children deserve to breathe clean air and the environmental and public health impact of this expansion would be devastating to our children's health - as well as the health of the community. While corporations may benefit from this expansion, the community and our families do not.

I would like to be provided with the short- and long-term environmental and health impacts of this expansion.

Thank you,  
Adrienne Kimmell  
312 Concord Rd.  
Bedford, MA

**From:** [Alex Chatfield](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Letter EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 1:41:10 PM  
**Attachments:** [Letter to MEPA 1-13-23.docx](#)

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Dear Alex,

Please acknowledge receipt of this email. Is this going to be included in the comments and questions concerning the expansion of Hanscom Field?

Alex Chatfield  
270 Concord Road  
Lincoln, MA 01773  
cell: 781-697-0140

This e-mail is intended for the person(s) to whom it is addressed and may contain information which is PRIVILEGED or CONFIDENTIAL. Any unauthorized use, distribution, copying or disclosure by any person other than the addressee(s) is strictly prohibited. If you have received this e-mail in error, please notify the sender immediately by return mail and delete the message and any connected files from your system. Please consider the environment before printing this email.

Alexander Stryisky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Stryisky@mass.gov  
(857) 408-6957

February 10, 2023

Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Stryisky:

I am a resident of Lincoln, MA and attended both the walk around at Hansom on 1/6/23 and the evening meeting on Zoom that you facilitated. I am gravely concerned that the expansion of Hanscom being proposed is antithetical to responsible climate action at this time. Private jets are among the most carbon intensive of transportation options.

I have read that a private jet emits 2 metric tons of CO2 each hour of operation while carrying it's crew and a small number of passengers. While the very wealthy and corporate customers may feel this is just fine, because they can afford it and feel immune from the severe dangers of climate change, this is obviously not true.

Massachusetts has in recent years passed ambitious goals for carbon reductions, and many cities and towns are now actively engaged in planning to help do their share to meet them. This project appears to be designed to wipe out the progress of all the surrounding communities by vastly expanding the jet activities at Hanscom Field. This makes no sense. MassPort appears to be going rogue and charting its own course to continue ever greater emissions while the rest of the state is trying to lower them. Is this about growing MassPort revenue? Pleasing the billionaire class? It is certainly not about the health and welfare of the citizens of the Commonwealth.

My questions echo those of my elected representatives on the Select Board in Lincoln.

1. Clarification on how this proposal adheres to and fulfills the goals of both the original Master Plan for Hanscom Field and the Metropolitan Area Planning Council's MetroCommon 2050 plan.
2. An analysis of the past 5 years of Hanscom air traffic and projected increases to air traffic that could potentially occur using the full capacity of the site if built as proposed.
3. A comparison of air traffic volume before and after the last comparable expansion of hangar space at Hanscom.
4. Data from the past 5 years on how many "ferry flights" currently occur, with what types of aircraft, and from which "home airport" those flights originate, as well as projections for the reduction in those figures if the expansion plans go forward.
5. Data on the extent to which "reverse ferry flights" occur currently, i.e., aircraft that are

based at Hanscom and take-off or land empty to pick up or drop off passengers elsewhere; and will there be any restrictions on such “reverse ferry flights” for all the aircraft newly based at Hanscom if the expansion plan goes forward?

6. A comparison of the estimated emissions resulting from such “ferry flights” currently vs the emissions generated by the projected increase in air traffic enabled by the proposed expansion of facilities.

7. A breakdown on frequency of each flight path used by aircraft type and how this is projected to change with the proposed expansion plan.

8. An analysis of the past 5 years of noise levels and projections of noise levels if the expansion plan goes forward.

9. Clear articulation of the maximum size and weight of planes and the noise profile of the loudest planes that the proposed expansion plan would enable.

10. Specific details of the “fuel farm” described in the Proponent’s public Zoom presentation on February 6, 2023, including estimates of the type and maximum number of gallons of fuel stored at the facility, the size and frequency of trucks that will supply such a fuel facility and what roads they will use to enter and exit the facility.

11. Specific emergency plans and firefighting techniques will be in place to handle spills and potential fires at the “fuel farm” facility or from trucks supplying the facility, and information about how that will comply with the Commonwealth’s PFAS regulations.

12. An analysis of the scope and distance of impacts of potential events to the Airforce Base, the Hanscom Schools, and adjacent neighborhoods.

13. Details on how and where the Proponent plans to de-ice aircraft, what chemicals will be used, how runoff from the aircraft will be controlled after the aircraft has left the de-icing station, and what contingency plans will be in place to control and mitigate chemical spills.

14. Details on the experience of the Proponent in operating such a facility, and any related environmental records.

15. An analysis of the wildlife and vegetation that currently exists and the amount of carbon sequestration provided by the area to be developed.

16. Are the proponents absolutely committing to the installation of the huge solar array mentioned in the presentation, or are they merely saying they are considering that? 4.6 megawatts is a large array. Have they gotten a commitment from Eversource that they can implement an interconnection to the local grid?

Sincerely,

Alex Chatfield

270 Concord Road  
Lincoln, MA 01773  
Cell: 781-697-0140



**From:** [Alex Pina](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 10:29:41 PM

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Mr. Strycky,

My name is Alex Pina and I'm one of the trustees at Battle Road Farm. We are home to 120 households, 48 of which are designated 40B and provide affordable housing that enriches our community and town.

As a property adjacent to the runway, flight path, and fuel storage for Hanscom Field, our residents are directly impacted by noise, air, and ground pollution caused by the airport. The proposed project plans to increase the size of aircraft using the field and will likely also increase the number of flights around our property.

This project does not improve our community or increase services to our residents. In fact, it does the opposite by placing the environmental burdens of the airfield on our residents for the benefit of wealthy individuals and corporations who see our community as a convenient stop on their way to other destinations.

As a trustee and representative of the battle road farm community, I implore you to record staunch opposition to this proposed project in order to protect the health and wellness of Lincoln residents.

Sincerely,  
Alex Pina  
Trustee of Battle Road Farm Condominium Association  
14C N Commons  
Lincoln, MA 01773

**From:** [A. Chatterjee](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hangar expansion of Hanscom Airport  
**Date:** Monday, February 13, 2023 7:30:07 PM

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Dear Mr Strysky,

As a local Bedford resident living close to Hanscom Airport, I strongly protest the new plans for expansion of the Hangar space. This may improve the lives of a few corporate leaders and billionaires, but will adversely affect the life of thousands of middle class people.

This airport sits in the middle of a residential neighborhood with school going kids and working professionals like us.

Over the last ten years, our peace at night has declined significantly and the flights being operated at night have increased significantly.

We local residents are dealing with increased air traffic and associated nuisances like loud jet engine warmups, take off and landing noises through the night, fumes from exhausts and increased volume of traffic on the approach roads.

This expansion plan will destroy what little peace of mind we have left.

I personally, and on behalf of several of my neighbors, would strongly recommend that you do not proceed with this Hangar expansion plan.

Best regards,

Anirban Chatterjee

**From:** [Ann Parke](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Regarding Hanscom Expansion  
**Date:** Monday, February 13, 2023 8:52:36 PM

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Dear Mr. Strysky,

My husband and I strenuously oppose further expansion at Hanscom.

As long-time residents of Lincoln we have already realized an increase in air traffic over our house in the past couple of years.

Further noise and pollution over Lincoln's homes and gardens is a giant step in the absolute wrong direction. Middlesex County is trying to clean up the air and water and this is a blatant disregard for those efforts.

Ann & Nathan Parke  
111 South Great Rd.  
Lincoln, MA 01773

**From:** [Anne Lovell](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Airfield Development  
**Date:** Monday, February 13, 2023 3:22:17 PM

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**I live at 15 S Commons, Lincoln and am well aware of the air traffic, noise, and air pollution from the flights coming and going to the airfield.**

**This is a highly populated area with surrounding farms raising crops and preserved conservation habitats, not to mention the historical significance.**

**When volunteering at the National Park, it is often difficult even now to give a presentation without having to stop and wait for a plane overhead to move away. Larger planes and higher traffic will only exacerbate an unhealthy situation that is happening now and render the area more unfit. Tourism is a viable, economic means for many. The historical and geographical environment are critical for the health of those that live here year round and the visitors from around the world. Let's keep it a place that people enjoy coming to visit to experience the birth of our nation, not a nation that has forgotten the import of it's beginnings and made it environmentally and physically unsafe.**

**EEA #16654: L.G. Hanscom Field North Airfield Development ENF**

**With hope in the integrity of those involved,**

**Anne Lovell**

**From:** [Ben McLaughlin](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 7:42:57 PM

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Hi,

I would like to comment on the proposed development at Hanscom, and note that expansion if Hanscom needs to be coupled with noise reduction techniques, and adjustments to after hours usage fees (which haven't inflation adjusted or changed in nearly 20 years).

The noise classification requirements for various planes have not changed either, despite 20 years of technological change. Noise ordinances at Hanscom should be no less stringent than those in place in San Diego's major metropolitan airport.

It is important to preserve the historic, natural and neighborhood character of abutting towns.

Consider the economic benefit of expanding infrastructure in other MA airports, particularly those serving Worcester and Springfield. There's a real upside potential in building up those airports .

Expansion of Norwood and Beverly may also help to distribute some metro Boston activity more evenly.

Ben McLaughlin  
Concord, MA

**From:** [Carrie Benis](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 4:59:09 PM

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February 13, 2023

Alexander Strycky MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114

RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strycky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

I am a local Bedford resident living at the "Hartwell Farms" community on Kendall Court which is roughly 1,000 feet from the edge of the proposed expansion site. I have two young children who play outside daily in the neighborhood and forests, also roughly 1,000 feet from the proposed expansion site. To put it bluntly I am appalled by the scale of this project and short comment timeframe and myself and my entire community are fundamentally opposed to the project.

While I am not opposed to responsible development in my town and state, I am not in support of massive development efforts that will drastically impact the environment and health of our local community and for the benefit of only a handful of wealthy individuals. By Massport's own admission, these hangars are all designed for private corporate clients to provide "a more comfortable flying experience." How can the "Proponent", Massport and the Commonwealth of Massachusetts ethically condone a project when there is clearly such a huge environmental cost to the area? Massport's mission is "to connect Massachusetts and New England to the world, safely, securely and efficiently, never forgetting our commitment to our neighbors who live and work around our ports and facilities." The Proponent/Massport's proposal for this expansion does not align with this mission. Their proposal is environmentally tone-def and directly opposes the climate change directives and mandates that the Commonwealth of Massachusetts has advocated and proposed.

There are many environmental and public health concerns that need to be addressed as follows.

1. When it comes to public health the evidence shows that there is a correlation between living near an airport and asthma and other respiratory diseases. A Logan Airport Health Study conducted by the Massachusetts Department of Public Health Bureau of Environmental Health in 2014 found that children in neighborhoods near Logan, are as much as four times more likely to exhibit signs of asthma compared with children in other areas; that adults are twice as likely to show signs of chronic obstructive pulmonary disease, or COPD; that there is a link

between pollutants and respiratory problems like asthma and wheezing. Yes, I chose to live near an airport, but I also trusted that any new developments would only be proposed when the benefits outweighed the costs. Impacting the health of entire communities for a “more comfortable flying experience” for corporate jet clients is appalling. Given Massport’s mandate, I am requesting that Massport explain how are they are expanding Hanscom “safely” and in consideration of their “commitment to our neighbors who live and work around our ports and facilities” when the majority of these communities are in strict opposition of this project and there are clear safety issues? I have read the proposal and the only justification provided for the project is to reduce number of flights due to the current need for “ferry flights.” Yet no information has been given to date about these ferry flights and how often they are used.

2. The overall impact of this airport on climate change is certain to be harmful. The reduction in ferry flights does not appear to be a significant mitigation of this impact. No data has been supplied indicating how many ferry flights will be involved or the overall expected impact on climate change is expected from this project. I request data showing that the overall expected impact of this project will reduce climate change impacts, in alignment with regional goals to achieve net zero carbon emissions by 2050.

3. As I understand it, the project includes a "fuel farm" despite being located over an aquifer. I am requesting information proving that this fuel farm will not endanger the aquifer or local drinking water supplies.

4. There is a process under way to nationally phase out the use of leaded avgas. I am requesting assurance that none of the new hangar space will be used for aircraft operating on leaded avgas. I am requesting assurance that the new fuel farm will not include facilities to store or dispense leaded avgas (which is available from other FBOs at Hanscom Field).

5. The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase. I request data showing that this will not produce a net increase in jet aviation traffic in the region, accounting for any possible reduction in ferry flights.

6. The project includes plans to upgrade taxiway and runway capabilities to accommodate larger Group 4 aircraft. I request data showing that this addresses an established need for the regional transportation system.

7. There is a climate change emergency and every effort must be made to phase out and not expand use of fossil fuels. I request an explanation of how this project contributes to the solution of this emergency.

8. Aviation contributes to the climate change emergency. I request detailed plans for the use of sustainable airplane fuel or alternate fuels such as hydrogen or electric power by all aircraft supported by this project. I expect that this project will demonstrate a monotonic reduction in greenhouse gas emissions to reach a net-zero target by 2031.

9. Hanscom Field adjoins Great Meadows National Wildlife Preserve. I request that this project be studied to show that protected wildlife in the national preserve will not be harmed.

10. Many significant historical sites are in the immediate vicinity. Aviation using Hanscom Field is supposed to avoid creating disturbance over Hartwell Tavern in the Minuteman

National Historical Park. The "shot heard round the world" was fired at nearby Old North Bridge in Concord and the Lexington Battle Green is an important historical site and tourist attraction. I request information showing how these historical sites will not be harmed, including tourist revenue, educational opportunities and recreational enjoyment of the spaces.

11. The plan involves removal of approximately 34 acres of wooded area. I request information showing compensatory protection of an equivalent area elsewhere in the region.

The overall impact of the proposed North Airfield/Old Navy Hangar projects is likely to cause regional harm. This large airport expansion is incompatible with the densely populated region and fails to adequately demonstrate the need or environmental impact mitigation. I do not believe these harms can be mitigated in any way.

**Therefore, I join my community members to oppose this project.**

Sincerely,  
Carrie Benis



**From:** [Deliana Ernst](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Chip Ernst](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 6:58:27 PM

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Mr Strysky,

We are writing you with grave concerns about project EEA #16654: L.G. Hanscom Field North Airfield Development ENF

We have grave concerns about the environmental impact of 27 new hangers and the upgrading of taxiways and taxi lanes so Hanscom can support the aircraft that will use those hangers. Under the concept, 'built it and they will come', you can be certain that if you build 27 hangers, eventually personal and corporate aircraft will show up and use that space and related facilities at Hanscom airfield. It is striking and completely tone deaf that this expansion is even being considered: Massachusetts is in the middle of an attempt to deal with an existential crisis to our state. Nevertheless Massport is intent on building its private jet business, one of the most intensive carbon-emitting mode of travel per person. This plan has no benefit to the community but comes at a huge environmental cost resulting from the extraordinary emissions impact of the jet trips themselves as well as the huge noise increase. This plan completely contradicts the climate change directives and mandates that the Commonwealth of Massachusetts has advocated and proposed.

We strongly urge you to not have this plan move forward, not now and not in the future.

Chip and Deliana Ernst  
204 Virginia Road  
Concord

**From:** [Coreen](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** "RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF"  
**Date:** Monday, February 13, 2023 9:54:39 PM

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Hi

I'm a Bedford resident that is concerned and opposed to this project for all the reasons community members have commented such as the impact on noise, the environment, construction/traffic and many other factors.

It doesn't feel that residents or our children are considered or that there is any collaboration. I'm extremely concerned about a fuel farm. There is already not enough done by the airport considering Lead fuel, noise, and the environmental impact. Also information is not transparent.

Please work to help our community.

Thank you  
Coreen Garrett  
[617-780-6717](tel:617-780-6717)

**From:** [david Louis](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Airport expansion  
**Date:** Monday, February 13, 2023 12:31:48 PM

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I live on the Bedford Concord border, but live in Concord and at present I am in the flight path of planes taking off and this is before expansion

I object to the quality of life for people who have worked very hard to raise their children without concerns for environmental damage as well as health issues

The enormity of what is being proposed, is going to change everything in diminishing the quality of life

The removal of large, mature trees, and being covered by concrete and tar can cause major environmental damage in some areas that already have high water tables as well as damage

to many wildlife's habitat

The consistent noise as well as traffic increase on narrow roads

And lastly, it is an insult

That all of this is being done within striking distance, to minute man national parks, and meadows in Concord

Thank you for making this available so that I could state my reasons why this plan should not happen

David L Negrin

Sent from my iPhone

**From:** [Dennis M Frenchman](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** MORE PLANES  
**Date:** Monday, February 13, 2023 10:50:48 PM

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I am opposed to the expansion of Hanscom Field for the benefit of wealthy private jet owners. We already have too many jets flying over our house. Some days its every hour or so. That plus I 95 noise are almost intolerable!

Air Traffic has been steadily increasing over the years and we certainly don't need more!

Dennis Frenchman  
3 Road  
Lexington, MA 02420

**From:** [Quiethouse Recording](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [rhazelton@gmail.com](mailto:rhazelton@gmail.com)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 8:55:18 AM

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Dear Mr. Strysky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

I am a small business owner, who runs a fairly busy recording studio about a mile away from the control tower at Hanscom. Right now my studio is in a soundproof room, where I rarely hear small planes, even if they fly directly over my house. The one thing I do here is any private or commercial jetliner that takes off from Hanscom. For the most part, it is a mild nuisance. There are some days where I have to work around the noise but it's usually a minor inconvenience.

What I'm afraid of with the proposed expansion is an increase in jet traffic at Hanscom to the point where it negatively affects my ability to conduct business and deteriorates our quality of life. I personally have lived near regional airports, pretty much my entire life. I grew up in Kankakee Illinois, about 3 miles on the flight path of the busiest runway, and as a kid, I remember watching the small planes in the sky, turn over my house for their final descent to the airport. I am also an avid aviation fan. I can usually identify by visual any plane that flies within the vicinity of our home. I actively track flights in and out of Hanscom, again - as an enthusiast, and not as someone who reports noise issues all the time. I am definitely sympathetic to a lot of the needs of customers of the airport. And we definitely knew what we were getting into by moving into a house next to an airport in 2011.

But my main concern is the rapid expansion of the airport to accommodate jet traffic. The citizens of Bedford do not want this. They want to keep Hanscom at or below the capacity that enjoys today. Many of them are very jaded by the communication between the citizens and Massport on projects in the recent past - many feel like actions, including the letter. I am writing to you today are for nothing since the developers with their millions of dollars and they are customers with even more millions of dollars speak louder with their money than we can in any public comment.

Included in this letter I support the following points of the HFAC chair.

There are many environmental concerns that need to be addressed.

1. The overall impact of this airport on climate change is certain to be harmful. The reduction in ferry flights does not appear to be a significant mitigation of this impact. No data has been given to HFAC indicating how many ferry flights will be involved or the overall expected impact on climate change is expected from this project. HFAC requests data showing that the overall expected impact of this project will reduce climate change impacts, in alignment with regional goals to achieve net zero carbon

emissions by 2050.

- 2.** It is understood that the project includes a "fuel farm" despite being located over an aquifer. HFAC requests information proving that this fuel farm will not endanger the aquifer or local drinking water supplies.
- 3.** There is a process under way to nationally phase out the use of leaded avgas. HFAC seeks assurance that none of the new hangar space will be used for aircraft operating on leaded avgas. HFAC seeks assurance that the new fuel farm will not include facilities to store or dispense leaded avgas (which is available from other FBOs at Hanscom Field).
- 4.** The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase. HFAC requests data showing that this will not produce a net increase in jet aviation traffic in the region, accounting for any possible reduction in ferry flights.
- 5.** The project includes plans to upgrade taxiway and runway capabilities to accommodate larger Group 4 aircraft. HFAC requests data showing that this addresses an established need for the regional transportation system.
- 6.** There is a climate change emergency and every effort must be made to phase out and not expand use of fossil fuels. HFAC requests an explanation of how this project contributes to the solution of this emergency.
- 7.** Aviation contributes to the climate change emergency. HFAC requests detailed plans for the use of sustainable airplane fuel or alternate fuels such as hydrogen or electric power by all aircraft supported by this project. HFAC expects that this project will demonstrate a monotonic reduction in greenhouse gas emissions to reach a net-zero target by 2030.
- 8.** Hanscom Field adjoins Great Meadows National Wildlife Preserve. HFAC requests that this project be studied to show that protected wildlife in the national preserve will not be harmed.
- 9.** Many significant historical sites are in the immediate vicinity. Aviation using Hanscom Field is supposed to avoid creating disturbance over Hartwell Tavern in the Minuteman National Historical Park. The "shot heard round the world" was fired at nearby Old North Bridge in Concord and the Lexington Battle Green is an important historical site and tourist attraction. HFAC requests information showing how these historical sites will not be harmed, including tourist revenue, educational opportunities and recreational enjoyment of the spaces.
- 10.** The plan involves removal of approximately 34 acres of wooded area. HFAC requests information showing compensatory protection of an equivalent area elsewhere in the region.  
The overall impact of the proposed North Airfield/Old Navy Hangar projects is likely to cause regional harm and contribute to environmental projects in many ways. This large

airport expansion is incompatible with the densely populated region. It is not expected that these harms can be mitigated in any way.

**Therefore, the Hanscom Field Advisory commission joins with regional town governments and citizen groups to oppose this project.**

**I sincerely hope you will take these letters and comments into account. The citizens do not want expansion of the airport.**

**Thank you for your time**

**Dereck Blackburn and Rebecca Hazelton  
56 Notre Dame Rd.  
Bedford, MA 01730**

--

Dereck Blackburn Quiethouse Recording

**From:** [dilla tingley](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Northairfield Development at Hanscom Field  
**Date:** Monday, February 13, 2023 11:56:56 AM

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I wish to express my strong objection to this project. It is totally counterproductive to Massachusetts clean energy goals.

Dilla Tingley  
140 Lincoln Road, Lincoln MA 01773.



**From:** [Doug Carson](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Public Comment re: EEA #16654: L. G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 7:56:29 AM

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Mr. Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Public Comment re: EEA #16654: L. G. Hanscom Field North Airfield Development ENF

---

Dear Mr. Strysky,

I oppose the Hanscom Field expansion slated to begin construction in January 2024. Much of the adverse impact of the project will be felt by residents of Lincoln.

I am concerned about increased aircraft operations.  
I am concerned about noise, air, water and soil pollution.  
I am concerned about public health.

Questions:

What are the current number of flights per day including the number of “ferry flights”?  
What is the planned number flights after the project is completed?  
What is the amount of carbon emissions from airport operations now and what will be the emissions in when the project is completed?

My reading and hearing from the Information already provided is that there will be more flights and more emissions which will adversely affect the health and welfare of the residents in Lincoln, Concord, and Bedford.

The 58% increase of 9 acres of impervious area will have a major negative impact on the environment and subsequently public health.

Please do not allow this project to go forward.

Sincerely,  
Doug Carson

**From:** [ed@sonn.org](mailto:ed@sonn.org)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Expansion of Facilities at Hanscom Not In Best Interests of the Community  
**Date:** Monday, February 13, 2023 4:51:49 PM

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The expansion is neither necessary or desirable. It should not be permitted.

Edward Sonn  
[ed@sonn.org](mailto:ed@sonn.org)  
Concord

Sent from my iPad

**From:** [Ellen Sebring](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** comment on L.G. Hanscom Field North Airfield Development  
**Date:** Monday, February 13, 2023 12:33:05 PM

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I am submitting a comment on L.G. Hanscom Field North Airfield Development.

I strongly object to the proposed Hanscom Field development for the following reasons:

**1. negative environmental impact completely against the goals for clean, sustainable climate goals** - this can not be underestimated in importance as it is a survival issue. Short term profits by such a development is not viable in the current need to reduce energy waste for the long term.

**2. disturbance of important American historical sites.** As a native of Concord, former Lincoln resident, and current Cambridge resident, I believe the historical sites adjacent to the Hanscom development will be seriously compromised by noise, traffic, and distracting activities much more appropriate for urban settings. The rare and long-preserved locations tell of our American history, literature and culture, and are a vital part of American identity that should not be ignored and turned into fodder based on the comings and goings of private jets. Please take a step back from profit and wealth taking over every corner of our land.

Thank you,  
Ellen Sebring

-----  
Ellen Sebring, PhD  
<http://ellensebring.com>  
<http://visualizingcultures.mit.edu>

## Strysky, Alexander (EEA)

---

**From:** Loughlin, Anni (she/her/hers) <loughlin.anni@epa.gov>  
**Sent:** Monday, February 13, 2023 7:00 PM  
**To:** Strysky, Alexander (EEA)  
**Cc:** Daly, Michael; Lowry, Shawn (he/him/his); Timmermann, Timothy; Augustine, Randi (DEP); 'GREENBERG, MATTHEW C GS-12 USAF AFCEC 66 ABG/CZOE'; FRYE, CURTIS A GS-14 USAF AFCEC CZOE  
**Subject:** MEPA - L.G. Hanscom Field North Airfield Development Project, Bedford, MA  
**Attachments:** 2023-02-13.MEPA-LG\_Hanscom\_Field\_North\_Airfield\_Development\_Project-SIGNED.pdf

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Attached is a comment letter regarding the L.G. Hanscom Field North Airfield Development Project in Bedford, MA. Thank you for your consideration.

-----Original Message-----

From: Strysky, Alexander (ENV) <[alexander.strysky@state.ma.us](mailto:alexander.strysky@state.ma.us)>  
To: ([patrick@mysticriver.org](mailto:patrick@mysticriver.org)) <[patrick@mysticriver.org](mailto:patrick@mysticriver.org)>; Adam Horst <[horstaf@bwsc.org](mailto:horstaf@bwsc.org)>; Adam Turner <[turner@mvcommission.org](mailto:turner@mvcommission.org)>; Alice Brown <[abrown@bostonharbornow.org](mailto:abrown@bostonharbornow.org)>; Alison Felix <[afelix@mapc.org](mailto:afelix@mapc.org)>; [avorce@nantucket-ma.gov](mailto:avorce@nantucket-ma.gov) <[avorce@nantucket-ma.gov](mailto:avorce@nantucket-ma.gov)>; Backman, Andy (DCR) <[andy.backman@state.ma.us](mailto:andy.backman@state.ma.us)>; Boeri, Robert (ENV) <[robert.boeri@state.ma.us](mailto:robert.boeri@state.ma.us)>; Brad Washburn <[BWashburn@massport.com](mailto:BWashburn@massport.com)>; Briggs, Andrea (DEP) <[andrea.briggs@state.ma.us](mailto:andrea.briggs@state.ma.us)>; Burtner, Jason (ENV) <[jason.burtner@state.ma.us](mailto:jason.burtner@state.ma.us)>; Woods, Beverly (NMCOG) <[bwoods@nmcog.org](mailto:bwoods@nmcog.org)>; Cape Cod Commission <[regulatory@capecodcommission.org](mailto:regulatory@capecodcommission.org)>; Carr, Jillian (FWE) <[jillian.carr@state.ma.us](mailto:jillian.carr@state.ma.us)>; Central Massachusetts Regional Planning Commission <[jpierce@cmrpc.org](mailto:jpierce@cmrpc.org)>; Kilmer, Charlie (OCPC) <[ckilmer@ocpcrpa.org](mailto:ckilmer@ocpcrpa.org)>; Cheeseman, Melany (FWE) <[melany.cheeseman@state.ma.us](mailto:melany.cheeseman@state.ma.us)>; [Christopher.Boelke@Noaa.gov](mailto:Christopher.Boelke@Noaa.gov) <[Christopher.Boelke@Noaa.gov](mailto:Christopher.Boelke@Noaa.gov)>; Czepiga, Page (EEA) <[page.czepiga@state.ma.us](mailto:page.czepiga@state.ma.us)>; Stewart Dalzell <[SDalzell@massport.com](mailto:SDalzell@massport.com)>; Dan Doyle <[doyle@mvcommission.org](mailto:doyle@mvcommission.org)>; Deanna Moran <[dmoran@clf.org](mailto:dmoran@clf.org)>; DMF EnvReview-North (FWE) <[dmf.envreview-north@state.ma.us](mailto:dmf.envreview-north@state.ma.us)>; Doyle, Alice (DEP) <[alice.doyle@state.ma.us](mailto:alice.doyle@state.ma.us)>; [Eric.Hutchins@noaa.gov](mailto:Eric.Hutchins@noaa.gov) <[Eric.Hutchins@noaa.gov](mailto:Eric.Hutchins@noaa.gov)>; Evans, Tay (FWE) <[tay.evans@state.ma.us](mailto:tay.evans@state.ma.us)>; zzzFerguson, Jana (DPH) <[jana.ferguson@mass.gov](mailto:jana.ferguson@mass.gov)>; zzzFlaherty, Erin (EEA) <[erin.flaherty@mass.gov](mailto:erin.flaherty@mass.gov)>; Fournier, Kathleen (DEP) <[kathleen.fournier@state.ma.us](mailto:kathleen.fournier@state.ma.us)>; Fragata, Carlos (DEP) <[carlos.fragata@state.ma.us](mailto:carlos.fragata@state.ma.us)>; Galvin, Mike (DCR) <[mike.galvin@state.ma.us](mailto:mike.galvin@state.ma.us)>; Gary Roux <[gmroux@PVPC.ORG](mailto:gmroux@PVPC.ORG)>; Gilmore, Daniel (DEP) <[daniel.gilmore@state.ma.us](mailto:daniel.gilmore@state.ma.us)>; Glenn, Kathryn (ENV) <[kathryn.glenn@state.ma.us](mailto:kathryn.glenn@state.ma.us)>; Gomes, Jeffrey R (DOT) <[jeffrey.r.gomes@state.ma.us](mailto:jeffrey.r.gomes@state.ma.us)>; Greene, Andrew (DPU) <[andrew.greene@state.ma.us](mailto:andrew.greene@state.ma.us)>; Haines, Samuel (ENV) <[samuel.haines@state.ma.us](mailto:samuel.haines@state.ma.us)>; Haney, Rebecca (ENV) <[rebecca.haney@state.ma.us](mailto:rebecca.haney@state.ma.us)>; Hill, David (DEP) <[david.hill@state.ma.us](mailto:david.hill@state.ma.us)>; Hobill, Jonathan (DEP) <[jonathan.hobill@state.ma.us](mailto:jonathan.hobill@state.ma.us)>; Hopps, Christine (DEP) <[christine.hopps@state.ma.us](mailto:christine.hopps@state.ma.us)>; Hopson, Barbara (AGR) <[barbara.hopson@state.ma.us](mailto:barbara.hopson@state.ma.us)>; Huckery, Pat (FWE) <[pat.huckery@state.ma.us](mailto:pat.huckery@state.ma.us)>; Jeffrey Walker ([jwalker@srpedd.org](mailto:jwalker@srpedd.org)) <[jwalker@srpedd.org](mailto:jwalker@srpedd.org)>; Jennie Moonan <[jmoonan@crwa.org](mailto:jmoonan@crwa.org)>; Jordan Velozo <[jordan.velozo@capecodcommission.org](mailto:jordan.velozo@capecodcommission.org)>; Julie Wood <[jwood@crwa.org](mailto:jwood@crwa.org)>; Kaitlyn Shaw <[kaitlyn.shaw@noaa.gov](mailto:kaitlyn.shaw@noaa.gov)>; Kasper-Dunne, JoAnne (DEP) <[joanne.kasper-dunne@state.ma.us](mailto:joanne.kasper-dunne@state.ma.us)>; Frew, Katelyn (FWE) <[kate.frew@state.ma.us](mailto:kate.frew@state.ma.us)>; Kim, Tori (ENV) <[tori.kim@state.ma.us](mailto:tori.kim@state.ma.us)>; Kinahan, Erin (DOT) <[erin.kinahan@state.ma.us](mailto:erin.kinahan@state.ma.us)>; Kirby, Christine (DEP) <[christine.kirby@state.ma.us](mailto:christine.kirby@state.ma.us)>; Laney, Kristen <[kristen@thebeatnews.org](mailto:kristen@thebeatnews.org)>; LaRosa, Thomas (DCR) <[thomas.larosa@state.ma.us](mailto:thomas.larosa@state.ma.us)>; Glorioso, Lauren (FWE) <[lauren.glorioso@state.ma.us](mailto:lauren.glorioso@state.ma.us)>; Dunleavy, Linda (FRCOG) <[lindad@frcog.org](mailto:lindad@frcog.org)>; Engler, Lisa (ENV) <[lisa.engler@state.ma.us](mailto:lisa.engler@state.ma.us)>; Logan, John (FWE) <[john.logan@state.ma.us](mailto:john.logan@state.ma.us)>; Lorion, Barry J. (DOT) <[barry.lorion@state.ma.us](mailto:barry.lorion@state.ma.us)>; Lucien, Lionel (DOT) <[lionel.lucien@state.ma.us](mailto:lionel.lucien@state.ma.us)>; Lucy Morrison <[morrison@mvcommission.org](mailto:morrison@mvcommission.org)>; Marold, Misty-Anne (FWE) <[misty-anne.marold@state.ma.us](mailto:misty-anne.marold@state.ma.us)>; Mary Waldron <[mwaldron@ocpcrpa.org](mailto:mwaldron@ocpcrpa.org)>; McKenna, Stephen (ENV) <[stephen.mckenna@state.ma.us](mailto:stephen.mckenna@state.ma.us)>; Melissa Provencher <[mprovencher@berkshireplanning.org](mailto:mprovencher@berkshireplanning.org)>; Michael Christopher <[michael.christopher@boston.gov](mailto:michael.christopher@boston.gov)>; Mike R Johnson - NOAA Federal <[mike.r.johnson@noaa.gov](mailto:mike.r.johnson@noaa.gov)>; Moran, Gary (DEP) <[gary.moran@state.ma.us](mailto:gary.moran@state.ma.us)>; [mpillsbury@mapc.org](mailto:mpillsbury@mapc.org) <[mpillsbury@mapc.org](mailto:mpillsbury@mapc.org)>; Mullaney, Brendan (DEP) <[brendan.mullaney@state.ma.us](mailto:brendan.mullaney@state.ma.us)>; Padien, Daniel (DEP) <[daniel.padien@state.ma.us](mailto:daniel.padien@state.ma.us)>; Padula, Michele (AGR) <[michele.padula@state.ma.us](mailto:michele.padula@state.ma.us)>; Paul Maniccia - ACOE <[Paul.M.Maniccia@usace.army.mil](mailto:Paul.M.Maniccia@usace.army.mil)>; Petitpas, Christian (FWE) <[christian.petitpas@state.ma.us](mailto:christian.petitpas@state.ma.us)>; Pioneer Valley



**United States Environmental Protection Agency**  
**Region 1**  
**5 Post Office Square, Suite 100**  
**Boston, MA 02109**

Date: See signature stamp below

Alexander Strycky  
Massachusetts Environmental Policy Act (MEPA) Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Via e-mail to [alexander.strycky@mass.gov](mailto:alexander.strycky@mass.gov)

RE: L.G. Hanscom Field North Airfield Development Project  
Bedford, MA

Dear Mr. Strycky:

The U.S. Environmental Protection Agency (EPA) is aware of the L.G. Hanscom Field North Airfield Development Project in Bedford, MA. It should be noted that this proposed project may be adjacent to and/or overlie two Superfund sites known as Hanscom Field/Hanscom Air Force Base and the Naval Weapons Industrial Reserve Plant. In accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), these sites are currently being investigated and remediated by the U.S. Air Force and U.S. Navy, respectively, with oversight by EPA and the Massachusetts Department of Environmental Protection (MassDEP). This proposed project is likely to overlap with areas subject to the Air Force/Navy's investigative and remedial efforts associated with the Superfund sites, including ongoing cleanup and monitoring of contamination in groundwater, land use controls, and upcoming additional investigations of contamination in soil, sediment, and groundwater.

EPA understands that Air Force submitted comments on this project on February 8, 2023, noting that the proposed development is in the vicinity of the Hanscom Field/Hanscom Air Force Base Superfund site. EPA, MassDEP, Air Force and/or Navy, as appropriate, must be involved in future discussions regarding the proposed project in order to ensure activities related to the proposed project can occur in a manner that remains protective of human health and the environment and does not interfere with ongoing cleanup remedies or future investigations.

Please feel free to contact me at [Loughlin.Anni@epa.gov](mailto:Loughlin.Anni@epa.gov) or 617-918-1273 with any questions.

Sincerely,

Anni Loughlin, Supervisor  
Federal Facilities & Housatonic River Section

cc: Mike Daly, EPA  
Shawn Lowry, EPA  
Tim Timmermann, EPA  
Randi Augustine, MassDEP  
Matt Greenberg, U.S. Air Force  
Curt Frye, U.S. Air Force  
Eric Ross, U.S. Navy  
Madeline Soule, MassPort



**From:** [Erika Maalouf](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 9:50:20 PM

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Dear Mr. Strysky,

I am writing to express my strong opposition to the proposed expansion of Hanscom airfield from an environmental standpoint. The expansion would have significant negative impacts on the local environment, including noise pollution, air pollution, water and soil pollution, and deforestation.

The proposed expansion would lead to increased air traffic, which would generate more noise pollution in the surrounding communities. This would have adverse effects on the health and quality of life of nearby residents, and could potentially cause long-term hearing damage.

Furthermore, the expansion would increase air pollution and greenhouse gas emissions, contributing to the climate crisis. The additional aircraft and ground vehicles associated with the expansion would produce harmful pollutants, such as nitrogen oxides and particulate matter, which can cause respiratory problems and other health issues.

The expansion would also have negative impacts on local water and soil quality. The construction and operation of the expanded airfield would generate significant amounts of runoff and potentially contaminate local water sources. In addition, the deforestation necessary for the expansion would disrupt local ecosystems, decrease biodiversity, and increase the risk of soil erosion.

I urge you to consider the negative environmental impacts of this proposed expansion and take action to prevent it from moving forward. Instead, we should prioritize alternative solutions that minimize the impact on our environment, including sustainable transportation options and conservation efforts.

Thank you for your attention to this matter.

Sincerely,

Erika Maalouf

51 Black Duck Rd, Concord MA 01742

**From:** [gail o'keefe](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Land Swap  
**Date:** Monday, February 13, 2023 3:30:54 PM

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Dear Mr. Strysky,

I write to voice my strong opposition to the proposal to expand capacity at Hanscom Airfield. The original placement of Hanscom, from the mid-1900s, was problematic, set in the midst of an important historic area, and ironically backing up to Thoreau's birthplace. However, my opposition is from the perspective of the future.

Massachusetts has made a bold and critical commitment to reduce carbon emissions. The action proposed is in direct opposition to this commitment, by facilitating more private jet traffic and not only allowing, but advancing the use of private jets to a small number of individuals.

The 'greenwashing' of this project is particularly egregious. To claim that there will be an environmental benefit by reducing 'ferry flights' is absurd, as the convenience and financial cost to the CEOs getting 'ferried' will be reduced. Moreover, the plan calls for expansion of impervious surfaces, further impacting the surrounding area. Moreover, the plan suggests they will "explore the feasibility" of solar panels, which is a hollow claim. To imply this project will be environmentally neutral on any level is absurd. Finally, the idea that the owners will be applying for state historic tax credits is a travesty.

The Commonwealth is charged with moving our infrastructure toward being more sustainable and equitable. This proposed expansion of Hanscom does just the opposite.

Sincerely,  
Gail O'Keefe  
22 Slocum Rd  
Lexington MA  
02421



**From:** [Sherry Haydock](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 12:16:35 PM

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I am writing to express my opposition to the proposed expansion at Hanscom Field. The negative environmental impact is enormous and this project should not go forward.

Gale S. Haydock  
registered voter in Lincoln MA

**From:** [Ira Goldman](#)  
**To:** [Stryisky, Alexander \(EEA\)](#); [Nina Hackel](#)  
**Subject:** Comments on MEPA Project 16654 "L.G. Hanscom Field North Airfield Development"  
**Date:** Monday, February 13, 2023 11:01:12 AM  
**Attachments:** [MEPA Comment HFAC 2023.pdf](#)

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Dear Mr. Stryisky,

My name is Ira Goldman and I reside in Concord MA near the entrance to Great Meadows National Wildlife Refuge and 2 miles west - directly aligned - of the main runway of Hanscom Field. I and my wife thus experience hundreds of low-altitude (500 -700 feet) take-offs and landings - almost directly over our house - from Hanscom each week (which also frequently take place between the so-called curfew hours of 11 PM and 7 AM).

I am the Town of Concord representative on the Massport Community Advisory Committee (MCAC). I am a frequent observer of the Hanscom Field Advisory Committee (HFAC).

This submission reflects my own views and not those of the MCAC (which is submitting a comment letter) nor of my employer.

In sum, I am vehemently opposed to this proposed project. Further, I believe that corporate and private jet flights as well as flight school operations at Hanscom should be significantly reduced from current levels, to reduce the misery suffered by residents of the Monsen Road area, and for all the reasons cited below in the HFAC letter and in the comments made by local officials during the webinar.

First, I completely share and support the views and position of the HFAC opposing this project which is attached to this message.

Second, I support and share the views - and the opposition to this project - expressed by Senator Michael Barrett, 3rd Middlesex, in the webinar held last week, who represents my state senate district. I also support the concerns raised during the webinar by MA House Reps. Ken Gordon and Michelle Ciccolo.

As HFAC notes, given the climate emergency we are living in, and the actions and goals of the Commonwealth of Massachusetts in recent years to address the climate emergency, I would summarize as follows: "Is Massport tone deaf? Are they living in an alternate universe? What are they smoking."

This project should be terminated and, in addition, all current flight operations at Hanscom should be severely curtailed and reduced.

Sincerely,

Ira N. Goldman  
130 Monsen Road  
Concord, MA 01742  
+1-978-808-9081 mobile

# HANSCOM FIELD ADVISORY COMMISSION

February 9, 2023

Alexander Stryisky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Stryisky@mass.gov  
(857) 408-6957

Dear Mr. Stryisky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

Hanscom Field Advisory Commission (HFAC) provides continued communication and education among the communities surrounding Hanscom Field and Massport and acts as an advisory commission for review and reaction to decisions relating to Hanscom Field, including land use, noise abatement, and transportation needs.

While HFAC has been aware for some time that a project would be proposed for the Hanscom North Airfield area, this filing is the first time we have been given any details about the proposed project. For many months there was the appearance that the sale and renovation of the old Navy Hangar was completely distinct from the North Airfield project; now it appears these projects are combined and have always been guided by a single developer. The scale of this project and short comment timeframe make it difficult for area communities and this commission to fully understand the proposal in the allowed comment period.

The reactions to this project known to HFAC have all been negative. The surrounding towns are all in the process of submitting letters in opposition to the project and many community groups are also opposed. The Minute Man National Historical Park and Great Meadows National Wildlife Preserve have both raised concerns. A number of members of the state legislature have expressed concerns or opposition to this project. HFAC is not aware of any local groups supporting this project.

There are many environmental concerns that need to be addressed.

1. The overall impact of this airport on climate change is certain to be harmful. The reduction in ferry flights does not appear to be a significant mitigation of this

impact. No data has been given to HFAC indicating how many ferry flights will be involved or the overall expected impact on climate change is expected from this project. HFAC requests data showing that the overall expected impact of this project will reduce climate change impacts, in alignment with regional goals to achieve net zero carbon emissions by 2050.

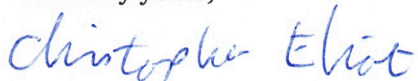
2. It is understood that the project includes a “fuel farm” despite being located over an aquifer. HFAC requests information proving that this fuel farm will not endanger the aquifer or local drinking water supplies.
3. There is a process under way to nationally phase out the use of leaded avgas. HFAC seeks assurance that none of the new hangar space will be used for aircraft operating on leaded avgas. HFAC seeks assurance that the new fuel farm will not include facilities to store or dispense leaded avgas (which is available from other FBOs at Hanscom Field).
4. The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase. HFAC requests data showing that this will not produce a net increase in jet aviation traffic in the region, accounting for any possible reduction in ferry flights.
5. The project includes plans to upgrade taxiway and runway capabilities to accommodate larger Group 4 aircraft. HFAC requests data showing that this addresses an established need for the regional transportation system.
6. There is a climate change emergency and every effort must be made to phase out and not expand use of fossil fuels. HFAC requests an explanation of how this project contributes to the solution of this emergency.
7. Aviation contributes to the climate change emergency. HFAC requests detailed plans for the use of sustainable airplane fuel or alternate fuels such as hydrogen or electric power by all aircraft supported by this project. HFAC expects that this project will demonstrate a monotonic reduction in greenhouse gas emissions to reach a net-zero target by 2030.
8. Hanscom Field adjoins Great Meadows National Wildlife Preserve. HFAC requests that this project be studied to show that protected wildlife in the national preserve will not be harmed.
9. Many significant historical sites are in the immediate vicinity. Aviation using Hanscom Field is supposed to avoid creating disturbance over Hartwell Tavern in

the Minuteman National Historical Park. The “shot heard round the world” was fired at nearby Old North Bridge in Concord and the Lexington Battle Green is an important historical site and tourist attraction. HFAC requests information showing how these historical sites will not be harmed, including tourist revenue, educational opportunities and recreational enjoyment of the spaces.

10. The plan involves removal of approximately 34 acres of wooded area. HFAC requests information showing compensatory protection of an equivalent area elsewhere in the region.

The overall impact of the proposed North Airfield/Old Navy Hangar projects is likely to cause regional harm and contribute to environmental projects in many ways. This large airport expansion is incompatible with the densely populated region. It is not expected that these harms can be mitigated in any way. Therefore, the Hanscom Field Advisory commission joins with regional town governments and citizen groups to oppose this project.

Sincerely yours,



Christopher Eliot, Ph.D. HFAC, Chair

[hfac@lincolntown.org](mailto:hfac@lincolntown.org)

**From:** [Isac Lee](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Field Expansion Questions and Concerns  
**Date:** Monday, February 13, 2023 1:55:18 AM

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Hello,

I am Isac, a new resident of the town of Bedford.

I learned recently that there are plans for massive expansion of Hanscom Field, and I have numerous questions and concerns.

Overall, despite my attempts to learn more about the project and details on the impacts it will have in the area, there is horrifyingly little information about this. Is there more detailed documentation than the Environmental Notification Form available?

For example, the actual goal of this is unclear - who would this actually benefit? Does this help **any Bedford resident** or nearby residents?

The environmental effects of this seems devastating yet the documentation addresses their effort to mitigate them very briefly without any details and calls of saying that it will actually be more environmentally friendly.

Going through 1.6 Summary of Project Benefits:

- how exactly will the design, construction, and operational phases achieve net zero energy?
- They mention they will "strive" for net zero energy - that's very vague.
- how are these "benefits" actually benefits to the region? Building electricity infrastructure and solar panels are great, but if they are for the purpose of increasing air traffic, is that actually beneficial?
- similar to the second bullet point, "prioritizing" low environmental impact construction materials is very vague; they should provide exact amounts that they will be held liable for.
- Who asked for supervised tours and feeling connected to the airport? Is "feeling connected" to the airport actually what the community wants? Especially in exchange for the environmental effects the expansion will cause?

Also, in section 4.2, it describes a few of the negative climate effects and their proposed mitigation. Again, the wording is very vague and concerning - here are some of the phrases and my comments:

"will be designed" - the proposal should not be accepted without this design already done,  
"where possible" - where is it actually possible and not possible? It is entirely possible after their design, none of the land will be possible for these mitigations. At least a range of the "possibility" should be stated so the developer can be held liable.

"in areas not utilized by aircraft" - this is an airport expansion with numerous hangars, I assume it is designed for utilization by aircrafts.

"Proponent is exploring the feasibility of..." - again this feasibility has to be figured out before giving empty promises

"buildings will be sited above peak flood elevation" - what about existing buildings outside of the airport that will be impacted by the change of ground conditions?

There are other statements like

- this will reduce "ferry" flights and thus actually reduce flights
- this will help train for new pilots

All these are great, except we have no evidence to see that they are actually true.  
We also need an unbiased analysis on how many flights there will actually be and how many will be reduced with the presence of the hangars.

These are just some of the concerns off the top of my head.  
Overall, they seem to be very roundabout in addressing the concerns of the community who they will be greatly affecting. This alone is very concerning as a resident of the community.

Please address these questions and help me understand who this will actually benefit.  
Thank you,

Isac



**From:** [jeannine taylor](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Expansion of Hanscomb  
**Date:** Monday, February 13, 2023 2:16:14 PM

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Alexander

As a 45 year resident of Lincoln the increase in noise from jets has been of concern. The jets flying overhead sometimes seem constant. This air traffic is unpleasant at best and a great source of frustration. I can only imagine that it would be unbearable if expanded. A fuel farm is also of immense concern for the environment so near a national park and national treasure. Please register my concern and complaint.

Sincerely  
Jeannine

**Jeannine Taylor**  
Realtor, Lincoln Real Estate Team  
m. 781-254-5620



**From:** [John Mandler](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Hoffer, Melissa \(GOV\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF.  
**Date:** Monday, February 13, 2023 7:15:07 PM

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February 13, 2023

Mr. Alexander Strysky, MEPA Office

100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: North Airfield Hangar Development Proposal

Dear Mr. Strysky:

I am writing to strongly oppose the North Airfield hangar development proposed by Runway Realty Ventures, LLC and North Airfield Ventures, LLC in their January 23, 2003 ENF.

The project has a number of negative environmental impacts that are not addressed in the proposal. Chief among them is the impact from a significant increase in aircraft operations, the destruction of 28 acres of trees, and additional paving.

Furthermore, the proposal does not provide any data to backup the claim that the additional hangers will result in fewer flights. A study is needed to survey the existing operators, and the current aircraft patterns of use.

The proposal makes the claim that the addition of 27 hangers will reduce the number of flights. This is highly unlikely. Instead the additional hangers and enlarged taxi way will allow more and larger aircraft to use Hanscom as a base. This use, for the benefit of private corporations and wealthy individuals,

will have a severe negative impact on the surrounding neighbors, National Park, and Wildlife preserve. The proposal not only fails to address these impacts, but fails to even mention it as a possibility.

Please do not allow this proposal to move forward. At a time when the state, towns and individuals are working to reduce climate causing pollutants, this project does the opposite with little benefit for the majority of the regional residents.

Thank you ,  
John Mandler  
Concord, MA

**From:** [Josh Tabata](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 8:26:36 PM

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Dear Officer,

I head a new that Hanscom airfield plans to expand jet hanger space. I, as a Lexington resident, seriously concern possible increase of air traffic. Air traffic of business jets here has been rapidly increased since the pandemic. I heard loud jet noise from my bed room from early morning to midnight. Very annoying. Also increase of business jet traffics damages local environment and global climate changes. It is not the right way to go. Please change the plan and stop the expansion of Hanscom.

Thank you

Josh Tabata

Sent from my iPhone

**From:** [Joy Duffy](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 9:21:20 PM

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Hello Alexander,

I'm writing as a concerned resident who lives on Hartwell Road in Bedford. I'm hearing bits and pieces from residents in town that there is major development proposed for the North Airfield. This is of great concern. This proposed plans strike me as absurdly large to be situated amongst our small town. This will negatively impact our road, our wildlife, our trees, as well as pollute our air, water and soil. Most of all negatively impacting the many families who live close by and gain no benefit from this development. I'm extremely concerned about increased traffic in our area. Please consider finding another location for this project.

Thank you,  
Joy Duffy

Sent from my iPhone

## Massport Expansion at Hanscom Field

We are writing to express our extreme dismay at Massport's consideration of a massive expansion/development at Hanscom airport. We lived in Lexington when a smaller (but significant) expansion was proposed about 20-30 years ago, which would have allowed a commuter airline to operate out of Hanscom. Fortunately, that proposal was dropped, after much debate. The new proposed expansion at Hanscom would appear to have a far more devastating effect on the local communities, and would seem to principally benefit private corporate clients. This new proposal has even less justification than the previous one.

We now live in Concord, not far from Hanscom. Our son, along with his wife and two sons (aged three and one) live in the Hartwell Farms Condominium Association in Bedford, which is adjacent to Hanscom. The proposed development would have a direct and deleterious effect on their health and enjoyment, and would undoubtedly result in a significant reduction in the market value of their home. Why should the economic advantage for certain private corporate clients be elevated over the economic and health realities of the Hartwell Farms residents?

The proposed expansion would also have an extremely negative effect on the environment of the neighboring towns, including Bedford, Lexington, Concord, and Lincoln. These communities are recognized for their successful environmental stewardship, and they deserve the support of the state and federal governments. PLEASE don't allow this unnecessary project to proceed

Judith and Paul Newman  
626 Main Street, #4  
Concord, MA 01742

Tel: 978-341-8800

email: [pnewman0841@gmail.com](mailto:pnewman0841@gmail.com)

February 13, 2023

**From:** [Kate Flora](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Expansion  
**Date:** Monday, February 13, 2023 5:14:20 PM

---

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Dear Mr. Strysky,

I am writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. As a resident of the surrounding community, I am deeply concerned about the environmental impact of increased air traffic and the harm it will cause to our daily lives.

Increased air traffic from the expanded airport will result in higher emissions of harmful pollutants, including greenhouse gases, nitrogen oxides, particulate matter, and lead from aircraft fuel. These emissions will contribute to air pollution and further harm the environment. The expansion will also lead to increased aircraft noise at all hours of the day and night.

I walk frequently in the Great Meadows Wildlife Refuge, and my son owns a house adjacent to the refuge. Already, the amount of air traffic is a significant detriment to this beautiful federal site and to the neighborhood. Further expansion--and though the plans seem to claim there won't be an expansion, none of us was born yesterday--will have an increasingly significant impact on this special place and on the value of the adjacent properties.

Given these negative externalities, it is only fair that the surrounding community be compensated for the harm caused by the airport expansion. This compensation could include, but is not limited to, funding for soundproofing of homes, financial compensation for decreased property values, and programs to mitigate the effects of increased pollution on public health.

I request that you reconsider this proposal and take into account the negative impact it will have on the community and the environment. Instead of expanding the airport, I strongly urge you to focus on finding alternative solutions that address the growing demand for travel while minimizing the impact on the environment. Investing in more sustainable forms of transportation, such as trains and electric vehicles, is a better way to reduce the environmental impact of air travel and protect our planet for future generations.

I strongly urge you to prioritize the well-being of the community and the environment before moving forward with this proposal. There will be a limited number of people who will benefit from this, however a larger number will be harmed. Residents should be fairly compensated for harms caused by the expansion.

Sincerely,

Kate Flora

--

October 2020 **Death Comes Knocking A Thea Kozak mystery**

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May 2020: Wedding Bell Ruse, my first romantic suspense

[www.kateclarkflora.com](http://www.kateclarkflora.com)

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**From:** [Kate McLaughlin](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 4:12:27 PM

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Good afternoon,

I am writing to voice my outrage with the proposal by Massport to expand aircraft infrastructure at Hanscom Field.

We own a home directly in the main flight path for Hanscom operations, and like many in the surrounding community already contend with noise pollution which exceeds reasonable levels in its frequency and intensity. We are regularly awakened multiple times at night and need to mute microphones or turn up our TV to compensate for the noise of jets and propeller craft. Multiple planes took off and landed while I wrote this email.

Hanscom is already a major regional airport, with 124,000 flights in the last 12 month reporting period. That's an average of more than 270 a day, and nearly half of Logan's flight volume (350,000)! The Worcester, Manchester NH, and Providence RI airports all had less than half of Hanscom's volume in the last reported 12 month period despite supporting major commercial carriers. Portland ME and Hartford CT are less busy than Hanscom, with less than 100,000 flights a year.

Massport would have you believe it has an effective noise mitigation plan in place. This is not true in practice. While a loud plane reporting line and website are available, the data collected does not influence airport operations (<https://www.thebedfordcitizen.org/2020/10/hanscom-fields-daytime-noise-complaints-who-sees-them/>). Fines for violating noise restrictions are not significant enough to serve as a deterrent, especially for cargo carriers and our beloved sports teams who frequently use Hanscom at night.

The noise level, as well as other environmental impacts such as water quality and emissions pollution including lead have not been reviewed in five years, and the 2022 report is only beginning to be prepared (see <https://www.massport.com/massport/about-massport/project-environmental-filings/hanscom-field/>).

Expanding Hanscom operations has no benefit for the surrounding residential communities of Lincoln, Concord, Bedford, and Lexington. However, the environmental impact for these communities would be significant. Rather than expand, I support efforts to further control Hanscom operations such as a ban on night operations, and encourage you to support restrictions as well.

At a minimum, no Hanscom expansion should proceed until the latest comprehensive environmental report is completed, shared with the public, and reflected in Massport plans. We should all be seeking to reduce this carbon intensive and disruptive means of travel, rather than add more capacity to what is already the second busiest airport in New England.

I hope you agree, and choose to serve the public in interest by blocking proposals to expand

Hanscom infrastructure and operations every time the opportunity arises.

Please let me know if I can be of further assistance in sharing my views.

Thank you and best regards,  
Kate McLaughlin

Concord, MA

**From:** [Kate Rossetti](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 10:25:06 PM

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Dear Mr. Strysky,

I am a homeowner in Concord and am writing in regards to my concerns about the planned jet hangar expansion project at Hanscom Field.

With the project slated to increase hangar space by 80% and 50 acres of land to be affected, there are significant impacts to the area (both for local residents as well as nature and wildlife) that are deeply concerning to me.

First and foremost, there is already significant air traffic overhead my home in Concord (and associated jet engine startup noise). I am alarmed by the possibility of this increasing from what is already a heavily trafficked airport.

However, much more importantly than the noise/traffic disturbance are the health risks to neighboring residents. I have two small children and am concerned about an increase in exceedingly emissions-heavy jets flying overhead the place where I have chosen to raise my family. This is a significant public health risk, and the MEPA ENF proposal provides inadequate environmental requirements or measures to protect public health.

Further, I am concerned about the impact on the environment. One of the primary reasons I chose to purchase a home in Concord, MA is for the natural beauty of the area, as well as the commitment of many (both individuals and nonprofits) to the preservation of nature. I am concerned not only about the possibility of fuel-contaminated water runoff in storms (with no clear indication of how this risk will be mitigated), but also the huge amount of mature forests and wildlife habitats that will be cleared and paved over in order to expand Hanscom.

The project is not at all in keeping with the state of Massachusetts's climate change and carbon reduction mandates, even if energy-saving features are added to new buildings. Rather, it is an expansion of the most intensive carbon-emission form of travel. I'm seriously concerned about the impact that this project will have on the environment.

It seems that this expansion project primarily benefits corporate executives and companies that can afford to buy and use private jets. I see little else that is redeeming about this project, and it appears that inadequate thought has been put into the community and environmental ramifications that a project of this nature will have.

Thank you for considering my concerns.

Best,

Kate Rossetti



**From:** [Kathryn Rifkin](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 4:31:29 PM

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Salutations to everyone,

I would like to point out a concerning mindset - that the airfield will be built to accommodate fossil fuel vehicles, air and land, complete with a fuel farm over an aquifer, leaded avgas, and four Bald Eagles in the flight path. It would make sense to mandate that the infrastructure be totally aimed at an EV only operation. Denmark and Sweden are doing this for all domestic flights by 2030.

"You may be boarding an electric plane sooner than you think. The [first rollouts for a major airline—with United—are due in 2026](#), and countries like [Denmark](#) and [Sweden](#) have announced plans to make all domestic flights fossil fuel-free by 2030."

<https://www.afar.com/magazine/electric-planes-are-coming-sooner-than-you-think>

This is best addressed in the planning stages, and giving notice to everyone that we are serious about people's health, the environment's health, and our pledge to cut back fossil fuel emissions.

Kathryn Rifkin  
18 Meadowbrook Road  
Bedford, MA 01730

**From:** [kay.aubrey@gmail.com](mailto:kay.aubrey@gmail.com)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** "[Kati Winchell](#)"  
**Subject:** Public Comment by Bedford Resident on 16654 L.G. Hanscom Field North Airfield Development  
**Date:** Monday, February 13, 2023 12:48:02 PM

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Hello Alexander – last night I went to the [Energy and Public Affairs Public Comments Portal](#) to submit my comment against this project. I returned there a few minutes ago to try to retrieve it and was unable to do this. There seems to be no record of the comment though I felt I had successfully submitted it. The user name I created is Kaubrey. I live at 30 Washington Street in Bedford, MA 01730. Phone is 781-275-3020 and I am sending you this message from my e-mail address.

HERE IS MY COMMENT, PLEASE ADD THIS TO THE SYSTEM

My family and I have lived in our house since 2001, and in this time have seen air traffic into and out of the Hanscom Air Field grow exponentially. Not only is there more traffic, but the aircraft flying in and out of Hanscom has gotten much larger. Today many are the size of commercial jets. Very frequently these jets idle or release jet fuel as they land so my neighborhood so the air often smells of thick jet fuel, which is very carcinogenic Many neighbors on our street have cancer or have died of cancer during the time we have lived here. It is very stressful to have to hear and see the jets constantly. The air pollution, noise and closeness of the jets as they land at Hanscom has made this neighborhood a very stressful place to live. We are outraged to hear that there is a plan in place to increase Hanscom Airfield's operational capacity by 50% by project 16654 L.G. Hanscom Field North Airfield Development. The additional air traffic generated by this added capacity will greatly decrease the quality of life in my neighborhood. Further, I believe that most of the residents in this area are unaware of the project and how it will add to the air traffic burden that our section of town is forced to shoulder

\*\*\*\*\*

Please let me know if you have any questions about my statement that would prevent it from being added to the other public comments on this project.

Best – Kay Corry Aubrey

**From:** [Kenda Kuncaitis Carlson](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 8:17:04 PM

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Sending again with full name and address included!!

As a neighbor of the Hanscom airport, I'm reaching out to express my concern about the massive expansion plan in the works with Massport. I moved to Bedford because of the idyllic community and knowing there was an active airport nearby. On weekends we hear the little putter flights fly overhead and my young children enjoy shouting at the airplane. During the weekdays we hear the corporate jets takeoff. I am not anti-airport, however I am against this development. There has been no commitment to investing alternatives to the leaded avgas that is used at Hanscom, so rightfully, I don't want more of it around. The [exposure to lead, especially in children, can cause significant health issues](#). Knocking down acres and acres of trees to pave space for more airplane hangars to house private jets with massive per-seat-mile carbon emissions goes against the movement toward a sustainable future that the Commonwealth of Massachusetts has proposed. Additionally when there's construction at Hanscom, there is increased construction traffic that jake-brakes in front of my house on rt 62, this is unnecessary noise pollution and significantly decreases our quality of life. Given the future daily fuel deliveries by tanker vehicles carrying leaded fuel, it is a significant ongoing concern.

Please consider the voice of the residents and families who live in the Hanscom vicinity. Let's protect the health of our children who live in the neighborhood.

Thank you for your consideration,  
Kenda Carlson  
197 Concord Rd. Bedford, MA 01730

On Mon, Feb 13, 2023 at 8:11 PM Kenda Kuncaitis Carlson <[kenda.carlson@gmail.com](mailto:kenda.carlson@gmail.com)> wrote:

As a neighbor of the Hanscom airport, I'm reaching out to express my concern about the massive expansion plan in the works with Massport. I moved to Bedford because of the idyllic community and knowing there was an active airport nearby. On weekends we hear the little putter flights fly overhead and my young children enjoy shouting at the airplane. During the weekdays we hear the corporate jets takeoff. I am not anti-airport, however I am against this development. There has been no commitment to investing alternatives to the leaded avgas that is used at Hanscom, so rightfully, I don't want more of it around. The [exposure to lead, especially in children, can cause significant health issues](#). Knocking down acres and acres of trees to pave space for more airplane hangars to house private jets with massive per-seat-mile carbon emissions goes against the movement toward a sustainable future that the Commonwealth of Massachusetts has proposed. Additionally when there's construction at Hanscom, there is increased construction traffic that jake-brakes in front of my house on rt 62, this is unnecessary noise pollution and significantly decreases our quality of life. Given the future daily fuel deliveries by tanker vehicles carrying leaded fuel, it is a significant ongoing concern.

Please consider the voice of the residents and families who live in the Hanscom vicinity.  
Let's protect the health of our children who live in the neighborhood.

Thank you for your consideration,  
Kenda



**From:** [Kim Jalet](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 1:03:15 PM

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I strongly oppose the proposed expansion of Hanscom Field. This proposal will obliterate the emissions goals for area towns and indeed the State of Massachusetts. On a personal note, our family already experiences so much air traffic that it can, at times, interfere with our enjoyment of our outdoor space at our home in North Lincoln. It is unfair to potentially decrease the property values of homes in the area surrounding Hanscom Field, which will inevitably happen if this project proceeds. The needs of the uber-rich with private planes do not supersede the needs of current taxpayers at a devastating cost to the environment.

Thank you for your consideration,  
Kimberly Jalet  
19 Brooks Road  
Lincoln, MA

**From:** [Laura Crosby](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion.,  
**Date:** Monday, February 13, 2023 4:06:21 PM

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I am deeply concerned about the many impacts the proposed airfield expansion will generate. I feel MASSPORT has rebuffed on its agreements here and is looking out only for their own (perhaps greedy) best interests. Unless concessions are made my family will work to defeat this measure.  
Respectfully,  
Laura Crosby

Sent from my iPhone

**From:** [Elder, Peggy](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Higgins, Timothy S.](#); [Vaughn, Paula](#)  
**Subject:** Lincoln Select Board's Comments on EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 12:54:12 PM  
**Attachments:** [Lincoln Select Board MEPA Comment Final.pdf](#)

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Attached please find the Lincoln Select Board's comments regarding the proposed Hanscom development referenced above.

Sincerely,

**Peggy Elder**

Administrative Assistant

On Behalf of the Select Board

*Town of Lincoln*

☎ Direct 781-259-2601

✉ Email [elderp@lincolntown.org](mailto:elderp@lincolntown.org)

# TOWN OF LINCOLN

## Lincoln Town Offices

16 Lincoln Road  
Lincoln, MA 01773  
Ph: 781-259-2600  
FAX: 781-259-8735



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Jennifer Glass, Chair  
Jonathan Dwyer  
Jim Hutchinson  
**Select Board**

Alexander Strycky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Strycky@mass.gov  
(857) 408-6957

February 10, 2023

Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strycky:

We are writing today to express our grave concerns regarding the potential environmental impacts and overall carbon emission increases that may occur if the plans contained in the Hanscom Field North Airfield Development ENF move forward. We believe that this expansion is in direct opposition to the ambitious climate goals we have set as a state, and that we are trying to meet on the local level. At a time when we should be investing in decarbonization strategies, this project is supporting intense fossil fuel usage that will benefit a few individuals with enough means to try to avoid the inconvenience of other modes of transportation.

The project is of particular concern to us for many reasons:

- Lincoln is responsible for the education of pre-K – 8<sup>th</sup> grade children living on Hanscom Airforce Base. We are concerned about the potential health impacts to our students and their families. The Hanscom Primary and Middle Schools and Base housing are located between 1.2 – 1.75 miles from the proposed site.
- We are concerned for the health of all our residents and those in neighboring towns. We underscore the fact that the 5-mile radius of the proposed project includes more than 30 census tracts identified as environmental justice neighborhoods. Within that area, for example, Battle Road Farm is a 120-unit development of which 48 units are income restricted.
- There is insufficient information both about current and future environmental impacts, and about the safety of a proposal that is adjacent to neighborhoods, schools, and a military base.

- The proposed project is adjacent to two Superfund sites, and there is insufficient information about the impacts of air traffic and the fuel farm on air quality and groundwater.

We respectfully request that MEPA review, and widen as necessary, the scope of information that you require the Proponent to provide during the upcoming Environmental Impact Report (EIR) to ensure that these potential environment impacts can be comprehensively and accurately assessed and quantified.

Specifically, we request the following:

1. Clarification on how this proposal adheres to and fulfills the goals of both the original Master Plan for Hanscom Field and the Metropolitan Area Planning Council's MetroCommon 2050 plan.
2. An analysis of the past 5 years of Hanscom air traffic and projected increases to air traffic that could potentially occur using the full capacity of the site if built as proposed.
3. A comparison of air traffic volume before and after the last comparable expansion of hangar space at Hanscom.
4. Data from the past 5 years on how many "ferry flights" currently occur, with what types of aircraft, and from which "home airport" those flights originate, as well as projections for the reduction in those figures if the expansion plans go forward.
5. Data on the extent to which "reverse ferry flights" occur currently, i.e., aircraft that are based at Hanscom and take-off or land empty to pick up or drop off passengers elsewhere; and will there be any restrictions on such "reverse ferry flights" for all the aircraft newly based at Hanscom if the expansion plan goes forward?
6. A comparison of the estimated emissions resulting from such "ferry flights" currently vs the emissions generated by the projected increase in air traffic enabled by the proposed expansion of facilities.
7. A breakdown on frequency of each flight path used by aircraft type and how this is projected to change with the proposed expansion plan.
8. An analysis of the past 5 years of noise levels and projections of noise levels if the expansion plan goes forward.
9. Clear articulation of the maximum size and weight of planes and the noise profile of the loudest planes that the proposed expansion plan would enable.
10. Specific details of the "fuel farm" described in the Proponent's public Zoom presentation on February 6, 2023, including estimates of the type and maximum number of gallons of fuel stored at the facility, the size and frequency of trucks that will supply such a fuel facility and what roads they will use to enter and exit the facility.
11. Specific emergency plans and firefighting techniques will be in place to handle spills and potential fires at the "fuel farm" facility or from trucks supplying the facility, and information about how that will comply with the Commonwealth's PFAS regulations.
12. An analysis of the scope and distance of impacts of potential events to the Airforce Base, the Hanscom Schools, and adjacent neighborhoods.
13. Details on how and where the Proponent plans to de-ice aircraft, what chemicals will be used, how runoff from the aircraft will be controlled after the aircraft has left the de-icing station, and what contingency plans will be in place to control and mitigate chemical spills.
14. Details on the experience of the Proponent in operating such a facility, and any related environmental records.

15. An analysis of the wildlife and vegetation that currently exists and the amount of carbon sequestration provided by the area to be developed.

In their cover letter to the ENF, the Proponent claims “the Project would result in environmental benefits associated with reduced air emissions by reducing overall aircraft trips”, but they have yet to provide any data or analysis supporting that claim. Given that the Proponent plans to add 495,470 square feet of space in the form of 27 new hangars and that the project could serve planes as large as Boeing 737s, we find it difficult to believe that overall air emissions would be reduced. Further, with the installation of a fuel field, and no firm commitment to install sufficient electrical infrastructure or PV array, the Proponent has made it clear they are committed to fossil fuel. As a result, we believe that this expansion would be completely contrary to the Commonwealth’s Clean Energy and Climate Plan for 2050.

Sincerely,

Lincoln Select Board

  
Jonathan Dwyer (Feb 10, 2023 20:19 PST)

Jonathan Dwyer

  
Jennifer Glass (Feb 10, 2023 21:22 EST)

Jennifer Glass, Chair

  
Jim Hutchinson (Feb 10, 2023 20:18 EST)

Jim Hutchinson

via email and USPS

**From:** [Mary Fenoglio](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion  
**Date:** Monday, February 13, 2023 7:26:03 PM

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We are opposed to this expansion. Uncategorically opposed and for a number of personal and environmental reasons.

On a very personal note: We live in Concord on the flight path and the noise is awful when they are coming in/taking off from our direction. To the point we cannot hear people next to us speaking. Our kids went to Fenn School and the noise disrupted classes. Not to mention all the pollution that this causes.

On a more general note I ask you to consider the following:

\*with increased jet traffic there will definitely be more carbon and poisonous gas emissions and Noise pollution.

\*the roads in this area are essentially country roads and cannot accommodate increased traffic. With this comes increased risks to our children's safety and health.

We moved out of the city to get away from this kind of pollution.airport.

\*there will definitely be risks of environmental waste and further risk to our ground water. There are still toxic dump sites there. What do you propose to do about this?

\*there will be significant water draw down from the Town of Bedford, 13,500gallons/day and more waste water produced, 12,000 gal/day

\*A huge amount of forest with mature trees will be cleared and paved over.

\*There may be fueling trucks driving on Hartwell Road and vicinity, as Massport has not committed to preventing this. ·

\*There will be huge water runoff in storms (with some fuel contamination) without a clear indication of how this will be mitigated. · There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments.

\*This is for the benefit of corporate executives and companies that can afford to buy and use private jets. It is hard to see how this will benefit the public.

This is an all round BAD proposal and is driven once again by greed with no respect for the land or the people who live here.

Thank you for your attention to my comments.

Sincerely,

Mary Fenoglio and Warren Covert  
966 Lowell Road  
Concord, Ma 01742

Sent from my iPad

**From:** [Mary White](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 1:37:53 PM

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Dear Mr. Strysky,

As a climate activist I am concerned about the plans Massport has put forth for the expansion of Hanscom Airport to accommodate the rental of private jets and the increase of impervious surface area. All of the surrounding towns have developed goals for cutting their CO2 emissions against stringent timelines. An increase in private jets, the most polluting activity anyone can do in effecting climate change, will counter these efforts. We should face reality and plan to replace this means of transportation with green transport to train stations. Slower, yes, but our society's penchant to ever faster results in so many areas has us rushing into irreversible pollution of our planet.

Sincerely,

*Mary White*  
*221 Monsen Road*  
*Concord, MA 01742*



**From:** [Melissa Karczewski](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 9:21:30 PM

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Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strycky,

Thank you for the opportunity to comment on the proposed expansion project at Hanscom Field. We live in the residential neighborhood in Concord, MA that is due west of Hanscom Field near the Great Meadows National Wildlife Refuge (GMNWR). Throughout the year, a significant amount of airplane traffic arriving and departing Hanscom Field passes over our neighborhood (typically flying at a low altitude). This traffic results in noise and air pollution that has an adverse effect on the residents of our neighborhood (including many small children and elderly residents) as well as the water, flora and fauna within GMNWR.

Before any expansion of Hanscom Field operations is allowed to proceed, the following environmental concerns should be thoroughly studied and mitigated by the project proponent:

Given the nature of the project, the traffic and transportation analysis should go beyond vehicle trips and include a thorough study of the aviation trips. The planned routes, frequency, and duration as well as environmental impacts on the surrounding community should be analyzed in accordance with industry standards. If the project is going to support larger aircraft, the routing and environmental impacts of those trips should be specifically identified. A mitigation plan should be developed that demonstrates how the impacts to adjacent communities from the aviation trips (noise, pollution, environment) will be mitigated. The communities and areas within those communities most impacted should be considered carefully as part of the mitigation plan. Similarly, the impact to GMNWR should also be studied and mitigated. The mitigation plan should include ongoing monitoring of aviation trips and mitigation measures to ensure that the reality comports to projections.

The expansion increases impervious area significantly and the application notes that areas for community open space are limited near the airfield. The proponent should propose the creation of offsite open space (or enhancement of existing open spaces) in neighboring communities in lieu of providing new onsite community open space.

Thank you,

Melissa Karczewski  
262 Monsen Road  
Concord, MA 01742

--

**Melissa Karczewski**

[773.470.6663](tel:773.470.6663) | [melissahun@gmail.com](mailto:melissahun@gmail.com)

**From:** [Melita Sawyer](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 5:34:33 PM

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To whom it may concern:

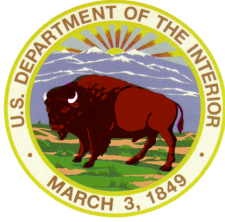
I am a resident of Concord, MA, and I am writing to voice my concern over the proposed expansion project at Hanscom Field.

The scope of the project seems far too large at a time when we should be working to reduce carbon emissions. The proposal seems to directly oppose the climate change directives and mandates that the Commonwealth of Massachusetts has advocated and proposed.

I also do not see that there is sufficient plan to mitigate risks to the local environment.

I consider the proposed development to be unacceptable.

Sincerely,  
Melita Sawyer  
555 Lexington Rd, Concord, MA 01742



United States Department of the Interior  
NATIONAL PARK SERVICE  
Minute Man National Historical Park  
174 Liberty Street  
Concord, Massachusetts 01742



1.A.1 (MIMA)

February 13, 2023

Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street  
Suite 900  
Boston, MA 02114

Re: L.G. Hanscom Field North Airfield Development Environmental Notification Form (January 2023)-EEA #16654

Dear Mr. Strysky,

The National Park Service (NPS) has reviewed the recent submission by Runway Realty and North Airfield Ventures, LLCs via VHB for the L.G. Hanscom Field North Airfield Development proposal to the Massachusetts Environmental Policy Act Office (MEPA Office). Minute Man National Historical Park (NHP) is an adjacent landowner to Hanscom Field and is within the direct air path of flights in and out of the airfield. In response to the Environmental Notification Form (ENF) submitted by the proponent to your office, the NPS is concerned about the proposed development project and potential effects to this National Park unit.

Minute Man NHP was authorized in 1959 by P.L. 86-321 “to preserve for the benefit of the American people certain historic structures and properties of outstanding national significance associated with the opening of The War of the American Revolution.” In 1992, P.L. 102-488 reaffirmed the congressional intent of Minute Man NHP to preserve and interpret “the historic landscape along the road between Lexington and Concord.” Located within the Towns of Concord, Lincoln, and Lexington, Minute Man NHP and the Historic District are comprised of numerous historic buildings, archeological sites, and cultural landscapes that are nationally significant. In addition, Route 2A which provides access to Hanscom Field via Hanscom Drive is designated as the Battle Road Scenic Byway and is an All-American Road and Scenic Byway. On April 19, 1775, the Battle of Lexington and Concord was waged within this landscape and lands within Hanscom Field and Hanscom Air Force Base were part of the battlefield. Segments of the approximately three miles of Route 2A through Minute Man NHP incorporate the original alignment of the road that the British Regulars used as they retreated to Boston after the opening shots at

North Bridge in Concord, MA. The Park attracts over one million visitors a year and contributes to the economic vitality of the region.

Currently, the park is directly impacted by the sound of aircraft consistently flying over the park especially in some of our most sensitive areas for the visitor experience, in the Hartwell Tavern area and along the Battle Road Trail. Any project which could further exacerbate these current issues will result in a cumulative degradation to the park. Several areas of concern have been raised for the NPS in review of the submitted ENF and the presentation on the evening of Monday, February 6, 2023. These include the use of Route 2A, potential natural and cultural resources damage, and noise impacts to the park and visitor experience.

**Clarify use of Route 2A and mitigate potential impacts.** Construction and post-construction use of Route 2A was unclear in both the analysis in the ENF and the 2/6/23 presentation. The use of Route 2A through the park by construction vehicles is especially troublesome as we prepare for the 250<sup>th</sup> Anniversary of the opening battle of the American Revolution in April 2025. In addition, MassDOT's proposed Route 2A repaving and safety improvement project is scheduled to take place in 2024. The long-term potential for an increase of vehicular traffic accessing Hanscom Drive via Route 2A would further exacerbate effects to the park's setting and visitor experience. Furthermore, the increase in truck traffic would diminish the repaving project's goal of making the historic corridor more pedestrian- and bicycle-safe. The NPS encourages the proponent team to articulate how construction and post-construction traffic will access the airfield and, if Route 2A is the preferred route, what the level of potential impact would be on the Minute Man NHP Historic District.

**Protect and preserve archeological resources on Massport Land within administrative boundary of Minute Man NHP.** Massport owns 51 acres within the administrative boundary of the park in the Elm Brook Hill and wetland area. Elm Brook is a natural feature which contributes to the natural landscape of the park in addition to being a key element of the battlefield associated with the Battle of Lexington and Concord. Archeological evidence and recent scholarship points towards Elm Brook Hill as an intense area of fighting and as a site used by indigenous communities before the American Revolution. Minute Man NHP would like further clarification on potential impacts to Elm Brook and the watershed related to vegetation removal, increase in impervious surface area, additional pollution, and stormwater issues related to the proposed project.

**Address potential impairment caused by increased air and ground noise.** Finally, as already mentioned, the current level of noise generated by frequent air traffic from Hanscom Field has considerable impacts on public programming, and the setting and soundscape of Minute Man NHP. Air traffic noise commonly interrupts park programs and impede the park's ability to offer a contemplative visitor experience. Additionally, this noise likely has adverse impacts on the park's wildlife, as many animals rely on sound for survival (finding mates, establishing territories, finding food, etc.). As such, the park is concerned that the proposed project will increase current noise levels even further. Minute Man NHP needs to better understand the current system of "ferry flights" and how the proposed project will actually decrease overall flights in and out of Hanscom Field. If the project is approved, will this meet the

current need of those on Massport's waiting list for hangar space? If so, what guarantee would there be to prevent a future waiting list and the return of "ferry flights"? There are many questions that remain unanswered in the ENF and further data and analysis is needed to gain a better understanding of potential impacts to the park.

Minute Man NHP would like to be a consulting party under Section 106 of the National Historic Preservation Act (36 CFR 800). The use of Federal Rehabilitation Tax Credits for the Navy Hangar rehabilitation and the federal permitting for the overall project through the Federal Aviation Administration and the Environmental Protection Agency triggers both the National Environmental Policy Act (NEPA) and Section 106. Please add us to the distribution list for future notifications related to this project.

If you have any questions on our comments, please do not hesitate to reach out to me by email at [simone\\_monteleone@nps.gov](mailto:simone_monteleone@nps.gov) or by phone at (978) 318-7811.

Sincerely,

*Simone Monteleone*

Simone Monteleone  
Superintendent

CC: Margie Coffin Brown, NPS-MIMA  
Mark Eberle, NPS-NERO  
Brona Simon, Massachusetts Historical Commission  
Elizabeth Sherva, Massachusetts Historical Commission  
Kerry Lafleur, Town of Concord  
Tim Higgins, Town of Lincoln  
Robert Domnitz, Lincoln Planning Board  
Jim Malloy, Town of Lexington  
Sarah Stanton, Town of Bedford  
Linh Phu, Great Meadows Wildlife Refuge-US Fish and Wildlife  
Anna West Winter, Save Our Heritage  
Nancy Nelson, Battle Road Scenic Byway Committee

**From:** [neil d.](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** expansion of Hanscom hanger space  
**Date:** Monday, February 13, 2023 9:38:43 PM

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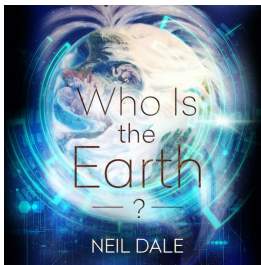
**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

As a long-term resident of Bedford, and member of 350 MA I want to register strong disapproval of the construction of commercial, private jet hangers at Hanscom. As the area of the Air Force base becomes less used we have a chance to let it revert to the natural state that it once was. Turning it into a commercial airport has been mostly stopped. Turning it into a private airport for corporate and wealthy private jets is even more objectionable.

As both a Bedford resident and concerned environmentalist, this project must be stopped.

*Neil Dale*

*Who Is the Earth?*



**From:** [Nicholas Ribush](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 3:14:37 PM

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As a 20-year Lincoln resident, I am writing in strong opposition to this project. As an 81-year resident of this planet, I do likewise. This expansion MUST NOT happen.

Thank you,

n.

Dr. Nicholas Ribush  
6 Goose Pond Rd.  
Lincoln MA 01773  
(617) 877-1610

**From:** [Nina Hackel](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion  
**Date:** Monday, February 13, 2023 7:12:33 PM

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To Whom it May Concern

I live in the Great Meadows area. I am concerned about the noise- the pollution that comes from the airport. We are trying to have less planes not more. Currently you allow the small planes to have lead fuel- this is despicable! Catering to the very wealthy and having more planes is not what Concord is about. We are trying to fight global warming and your airport is allowing joy riders to poison our wetlands and now you are having separate planes for the wealthy. Let's stop pollution and let's stop catering to the wealthy and save our planet!

This is a definite No!

Cheers

Nina Hackel

President

**Dream Kitchens**

139 Daniel Webster Highway

Nashua NH 03060

Cell 339-223-5300

Office 603-891-2916



**From:** [pat keane](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 6:32:44 PM

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> Dear Mr. Stryisky, I have a number of concerns about this project, the main ones, at this point, involving impact upon the environment and the people living in surrounding communities.  
> I believe that plans for this project have shown up to the public late in the game, and I wonder why it has not been more transparent before now.  
> Because of this delay in making the public aware of this project, I believe that more time is needed for the public to review the plan and assess the impact.  
> Sincerely,  
> Pat Keane  
> 100 Keyes Rd., Unit 422  
> Concord, MA 01742  
>  
>  
> Sent from my iPhone

**From:** [Patrick Eaton](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Patrick Eaton](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 10:34:16 PM

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Hello,

Thank you for the opportunity to comment on this proposed project. Please register my voice as another neighbor opposed to the Hanscom airfield development proposal.

This proposal is clearly out of touch with the values of the Metrowest towns and the state of Massachusetts as a whole. At a time when we are faced with a climate crisis, we should not be increasing our use of air travel, the most damaging form of travel--and private air travel at that. We know that these runways take planes directly over sensitive wildlife refuges, important cultural sites, various recreations, and of course many neighborhoods across all towns in the area and impact all of these negatively with noise, pollution in the form of leaded fuel byproducts, and vibration. We also know that the flights using Hanscom already do not abide by the agreements the agency has made with neighbors. Let's not make the problem worse with incentives for more flights from the facility.

The proposal claims that this expansion will reduce the number of ferry flights that carry no passengers. It is noticeably quiet on the change in the total number of flights in a day. No reasonable person would believe that adding hangar storage and enhancing taxiways will reduce the use of those planes. If the developer thinks that, then let them build a museum someplace with no adjacent runway.

Sincerely,

Patrick Eaton

141 Monsen, Concord

**From:** [Phoebe Francis](#)  
**To:** [Stryky, Alexander \(EEA\)](#)  
**Cc:** [Kati Winchell](#)  
**Subject:** Hanscom expansion  
**Date:** Monday, February 13, 2023 10:26:18 AM

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Dear Mr. Stryky,

The deleterious effects of more Hanscom expansion could not be more clear.

For the future of our children and grandchildren, plans for this unnecessary projet should be abandoned immediately.

Sincerely,  
Phoebe Francis  
16 Sunnyside Ln  
Lincoln, MA 01773

**From:** [Robin Wilkerson](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Expansion.  
**Date:** Monday, February 13, 2023 8:15:52 PM

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A bad idea - and one that I know the surrounding communities will fight tooth and nail. We have a climate emergency folks, and this is the sort of thing that only serves to exacerbate it. Please save wear and tear on the planet and give this up.

Thank you. Robin Wilkerson

Robin Wilkerson  
31 Old Winter St.  
Lincoln, MA 01773  
[outsideinformation@gmail.com](mailto:outsideinformation@gmail.com)

**From:** [Sharon Burke](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Monday, February 13, 2023 11:06:17 PM

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Dear Mr. Alexander Strycky,

My husband and I and our children live on Hartwell Road in Bedford, adjacent to the Hanscom Air Field. We are extremely concerned about and highly oppose the expansion of the Hanscom jet hangar space.

There are so many reasons this project should not go forward. Bedford is a residential community and this project is driven by financial greed. This massive project would be constructed knowing full well that it will be impacting the health and well-being of the surrounding residents and communities. It would also destroy the vast wildlife (e.g., deer, coyote, turkeys, raccoons, turtles, beavers, owls, hawks, bees, etc.) that currently inhabit the forest that would be cut down and paved over.

I have many questions and concerns about this project:

- What can be done to stop this project?
- Our main concern is the health and well-being of our family and others living nearby. We are concerned about long-term health risks. What are the increased health risks to those living in the nearby neighborhoods? Right now there is mild aircraft activity with small private planes. Having larger planes and increased plane activity will certainly create a lot more air pollution with toxic gases drifting into our backyards. We are also concerned about water and ground contamination. This is just not in the best interest of the residents living in this small community.
- How many more flights are anticipated to occur on a daily basis after this project is complete? How many occur now?
- How can we receive regular notices and communications regarding the status of this proposed project?

Thank you for your time and assistance.

Sharon and Peter Burke  
106 Hartwell Rd.  
Bedford, MA 01730

February 13, 2013

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs  
MEPA Office 100 Cambridge Street  
Boston, MA 02114

Attn: Alexander Strysky,

Re: Comments on ENF #16654  
L.G. Hanscom Field North Airfield Development,  
Bedford, MA

Dear Mr. Strysky,

Thank you for the opportunity to submit comments on the ENF as well as suggestions for incorporation into the DEIR. I am hopeful that the draft EIR will include many more details and data for Bedford residents. It is my wish and request also, that due to the complexity of this proposal, that the mandatory period for review be extended so Bedford residents have time to adequately review and comment on the draft. The ENR was issued just recently and is a long document. Conceivably, many residents remain unfamiliar with the issues and the processes involved.

The following are my comments:

1. It appears to me that there is no data in the ENR that supports the claim that overall airport trips will be reduced. The proponent puts forth reducing “ferry flights” while proposing 27 hangars as well as field changes. Some also are to accommodate level IV aircraft. Twenty-seven hangars can accommodate a lot of airplanes. More airplanes conceivably mean more employees, more passengers, more flights, more traffic and a busier airport. Relevant to this claim, the provision of supporting data showing the reduction of over-all aircraft trips is needed.
2. I could find no rationale for increasing plane size to level IV. Data is needed to support this change. My understanding is that flight passenger capacity at Hanscom is presently limited to 60 persons. Does increasing size of planes mean a capacity change is planned? If so, why and what supports this increase? Has this been approved? Specifically, are future public commercial flights, i.e., the services from airlines like Jet Blue, Delta and/or other commercial airlines anticipated?
3. Mr. Michael Argiros letter of January 17, 2023 accompanying the ENR submission when discussing aircraft parking and storage on-airport alludes to “...*Massport’s long term planning objective aimed at using regional airports to satisfy the current and future demand for general aviation services*”. Are commercial airlines part of this long-term planning? If so, how would this benefit Bedford and how would this negatively impact Bedford?
4. The incorporation of solar power and lightly colored reflecting roofing while conceivably laudable does not address glare, reflectivity and safety and aesthetic issues. What data supports that such possible effects will not be a problem for Bedford residents and airport users? Are there computer models which can illustrate the effect of such a large array? Are such arrays in use elsewhere? What data is available?
5. What is “Plan B” if solar is not workable? To justify a full environmental review, I recommend data for alternatives sources of energy be included.
6. Also, re energy sources, will substation(s) be provided? If so, where located?

7. My reading indicates Worcester Regional Airport has experienced less demand. How does Hanscom compare with Worcester Regional Airport in capacity, use, hangar space, hangar vacancy and permitted levels of aircraft and use? I could find no recent ENR re Worcester Regional Airport. If storage is available elsewhere, please explain why Bedford and surrounding towns should experience changes for private corporate needs? And even if space is not available in Worcester and elsewhere, why are other facilities not included in such long-term planning?
8. Climate and precipitation issues are of concern to residents. The ENF includes a notable expected increase in impermeable surface and expected rainfall. What I didn't see addressed is whether the remediation proposed for water run-off is actually feasible with the increased impervious areas. It's not that I discount it, but understanding is complex. Since proposed airport surface changes likely allows for more water run-off, can illustrations be provided of the remediation proposed? Are such proposals in operation elsewhere so residents have a clearer understanding using actual workable examples and view data from the same?
9. Does Bedford receive tax benefits from this venture? Does the state receive tax benefits? If so, what are the dollar expectations for Bedford and Massachusetts?
10. Bedford has traffic issues. Transport of fuel is of concern. The ENR does not appear to me to address traffic issues clearly including the provision of fuel and safety. One article in the local on-line Bedford Citizen indicates one thing:  
<https://www.thebedfordcitizen.org/2022/06/according-to-massport-new-north-airfield-development-will-not-include-fueling/>  
Another article indicates a fueling station: <https://www.thebedfordcitizen.org/2023/02/fuel-farm-planned-for-new-hanscom-hangar-complex/>  
Please clarify and elaborate with data and safety information and how fuel will be handled in any changes at Hanscom Airfield and if local streets will be used. Please provide more data and information re traffic and airfield access by increased numbers of workers, passengers, etc.
11. Lastly, I repeat my request that due to the complexity of this proposal, that the mandatory period(s) for review be extended so Bedford residents have time to adequately review and comment on any draft. The ENR was issued just recently; it is a long complex document. Conceivably, many residents remain unfamiliar with the issues and the processes involved. Time is needed to understand fully and reflect on the proposals and reviews.

Respectfully,  
Sue Davis  
3 Pickman  
Bedford, MA 01730

cc: Bedford Select Board (Emily Mitchell, Chair)  
Bedford Conservation Commission Members  
Ken Gordon

**From:** [Susan Stason](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion ENF EEA#16654  
**Date:** Monday, February 13, 2023 6:41:49 PM

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I am opposed to the expansion of Hanscom AirField for private citizen use. The Fuel Farm in particular will have a huge negative impact on air quality. The natural land will be further destroyed and cemented over.

Susan Stason  
29 Sandy Pond Rd  
Lincoln, MA 01773



**From:** [Mitchell, Emily](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [Ken.Gordon@mahouse.gov](#); [Mike.Barrett@masenate.gov](#); [Christopher Eliot](#); [Stanton, Sarah](#)  
**Subject:** Public Comment -- Town of Bedford, Re: EEA 16654, L.G. Hanscom Field North Airfield Development  
**Date:** Monday, February 13, 2023 9:22:37 PM  
**Attachments:** [Town of Bedford comment on North Airfield Development ENF.pdf](#)

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Dear Mr. Strycky,

Attached please find a letter from the Bedford Select Board and various Town departments concerning the proposed North Airfield Development at Hanscom Field.

We look forward to the next steps in the process, and hope for continued open lines of communication among the developers, Massport, and the Town.

Sincerely,  
Emily Mitchell  
Chair, Bedford Select Board

Town of Bedford  
Town Hall, 10 Mudge Way  
Bedford MA 01730

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs (EEA)  
Attn: MEPA Office  
Alexander Strysky, MEPA Analyst for the Project  
100 Cambridge Street, Suite 900  
Boston MA 02114  
VIA EMAIL: Alexander.strycky@mass.gov

Re: EEA 16654, L.G. Hanscom Field North Airfield Development

Dear Ms. Tepper and Mr. Strycky:

Thank you for the opportunity to submit public comments regarding the proposed North Airfield Development at L.G. Hanscom Field in Bedford, EEA 16654.

The proposed North Airfield development lies within the Town of Bedford and relies on Town infrastructure to operate. Our residents will feel the greatest impact from both construction and daily operations of the new facilities. We encourage the Proponent to consider more broadly the needs and interests of the Town, particularly of the residential neighborhoods both west and east of the Project boundaries, and the youth sports facility located directly across Hartwell Road from the Project.

The following comments come from the Select Board and Town departments, including Public Works, Fire, Health and Human Services, Planning, and Code Enforcement.

**I. INFRASTRUCTURE**

The proposed Project creates substantial impacts to the Town of Bedford's infrastructure, including roadways and utilities. We understand that Massport is exempt from local zoning regulations, though the Project will require several regulatory permits and approvals from the Town (page 1-7, Table 1-3).

The full extent of growth and activity in the North Airfield area cannot be understood without acknowledging the ongoing construction of T-Hangars abutting the west side of the Project. These hangars should be reflected on the site plan, if only in grayscale, to allow local officials and residents to see the full picture of increased development at Hanscom Field.

**Traffic**

The Project will significantly impact local roads in Bedford. Hartwell Road is a narrow local road that curves along the edge of the airfield property, with limited sight distance in many key spots. Other local access points include Loomis Street, South Road, and the Hanscom AFB "Fam Camp" area near the northeast end of Runway 5-23. During the 2017 reconstruction of Runway 11-29, Massport used local

roads in Bedford (chiefly Hartwell Road and South Road) for construction vehicle access, causing persistent and significant disruptions to neighborhoods and residents. **We urge consideration of the following items related to traffic and roadway impacts from the Project.**

### 1. Traffic Study

**A full traffic analysis should be required** to determine average daily trips and peak hour impacts to the intersections of Hartwell Road at Concord Road and Hartwell Road at South Road, including an evaluation of traffic signal warrants for each intersection.

### 2. Internal Service Roads

We note that the Proponent is exploring the feasibility of using the airfield to accommodate construction vehicle traffic and ongoing fuel delivery (page 1-5, 1.5 Anticipated Project Schedule and Phasing) by constructing a new inner roadway. **We strongly encourage this option, which would allow construction vehicles and fuel trucks to access the Project site from Interstate 95/128 to State Route 2A and Hanscom Drive, which are designed to handle heavy equipment at high volumes, unlike Bedford's local roads.** The Proponent should confirm whether such internal circulation route used for construction will be closed following completion of the Project.

The scope of review should be expanded to include any potential changes to the existing service road that extends around the periphery of Runways 23 and 29. There are several wetlands, watercourses, and flood plains adjacent to the service road that could be impacted by any proposed improvements or construction activity. The types of vehicles and internal traffic that might use this service road should be identified (e.g., fire apparatus, fuel trucks, service vehicles, employee vehicles, etc.). **If an internal service road is not available between facilities on the south and north sides of the airfield, the resulting impact on local streets from moving people and materials around the airfield must be examined and addressed.**

The scope should also address whether there is any proposed connection of a service road from the T-hangars westerly to the existing service road around Runway 11.

### 3. Long-term Changes to Roadways

The Proponent proposes to use "an existing curb cut" (ENF, page 6) off Hartwell Road for staff and passengers to enter the Project area, while Figure 1.2 appears to show two curb cuts—one for the North Airfield and one for the Navy Parcel. **We encourage the Proponent to minimize the use of Hartwell Road as an access point for the Project,** especially during construction.

Among mitigation options for increased traffic impacts, **the DEIR should examine potential changes to the layout of Hartwell Road,** including possible realignment to reduce the sharp curvature of the roadway along the Project boundaries and improve sight distance and safety for all users. The project may affect the public access easement over Hartwell Road where the land is currently owned by the Federal Government; additional information is required on this point.

**The Town encourages assessing the feasibility of adding sidewalks and bike lanes on Hartwell Road,** for eventual connections to an ongoing effort to expand pedestrian mobility and the sidewalk and trail network throughout Bedford.

### **Utilities**

In preparation of the DEIR, **the Proponent should confirm with Bedford DPW whether improvements are required in the water and sewer system to accommodate the Project.** The List of Anticipated Regulatory Permits and Approvals (page 1-7, Table 1-3) shows a Water Service Connection and Sanitary Sewer Service Connection for the Navy Parcel only, not for the new construction at the North Airfield. Given the anticipated 13,500 gallons per day of additional water use and 12,150 gallons per day of additional wastewater generation and treatment, as outlined in the Summary of Project Size and Environmental Impacts (ENF, page 3), we expect each parcel will need its own water and sewer connection and associated permits, and may also be subject to Inflow and Infiltration under the Town's Sewer Bylaw. Additional capacity analysis for both water and sewer demand should be performed by the Town's consultants at the Proponent's expense for the full buildout of both sites.

**The applicant team should also explore potential electric supply/capacity issues,** including the potential need for expanded capacity at the existing substation at the intersection of Hartwell Road and South Road; installation of new wires/poles/transformers along Hartwell Road; or installation of any on-site substation to supply the Project, given the Proponent's stated intent of increasing the use of electric-powered aircraft.

### **Capacity/Growth**

The Proponent states that the Project will decrease operations in and out of Hanscom Field, due to reductions in so-called ferry flights by aircraft based elsewhere. The ENF repeatedly notes that current hangar capacity is oversubscribed, with existing hangar owners reporting wait lists for aircraft wishing to be housed at Hanscom. Without clear data on the number of ferry flights and existing hangar capacity, we question the assumptions underlying the Project and the expectation that the Project will meet both current and future needs. **We ask the Proponent and Massport to provide current data on the number of ferry flights and justification for the claim of fewer total flights due to the Project.**

## **II. ENVIRONMENTAL**

The Project will have significant impacts on Bedford's natural resources, including stormwater management, air quality, noise pollution, and wetlands and wildlife protection.

### **Noise**

Bedford is a member of the Hanscom Field Advisory Commission (HFAC), a coalition of neighboring towns that meets monthly with Massport to review noise and capital project reports, among other relevant items. Bedford residents consistently log the highest number of noise complaints each month

from aircraft operations, including takeoffs, landings, and touch-and-gos. Flights in the air are under the jurisdiction of the FAA, but Massport has jurisdiction over aircraft when they are on the ground.

Aircraft stored in the new hangars will need to taxi to and from the Project area to the runways. Adjacent residential neighborhoods will feel increased noise impacts due to the proximity of idling aircraft, maintenance, and site operations. The noise from this ground movement may not be captured in monthly noise reports, which rely on technology that matches the site of a noise complaint with available data on planes in the air (airnoise.io, Flight Tracker, etc.).

**We urge Massport and the Proponent to minimize or absorb such ground noise**, whether through physical barriers, restrictions on operations, or other measures, and to take proactive steps to measure actual noise in the future.

### **Stormwater Management**

The Proponent should be aware of the Town's Stormwater Management Bylaw and Regulations, as these standards are more stringent than MassDEP's stormwater standards. Per the project description (ENF, page 6), the site will "be designed to encourage positive drainage away from the hangar buildings." Water that drains away from the hangars must go somewhere, and we are concerned that additional stormwater could end up in Bedford's neighborhoods, wetlands, or conservation lands.

We appreciate the consideration for pervious pavement in parking and other areas to reduce the potential for excessive stormwater runoffs, but **we remain concerned about impacts of new construction and use on local waterways and our water table.**

### **Wetlands/Aquifer Protection**

The North Airfield site lies within one of the Town's aquifer protection districts, and wetland buffers cover more than half of the total airfield property. Since the 2017 ESPR, Bedford has ceased use of its Shawsheen wells due to PFAS/PFOA contamination, which we believe was caused at least partly by firefighting foam and other chemicals in use on and around Hanscom Field. The North Airfield and Navy Parcel sites are also adjacent to the former Naval Weapons Industrial Reserve Plant, which remains under EPA cleanup protocols as a Superfund site.

**An initial wetland survey of the development area by a third-party consultant would be helpful.** The Town GIS map shows an area of wetlands north of the long east-west running wetland feature. While isolated vegetated wetlands are not protected under the state Wetlands Protection Act, they are under the Town's Wetlands Bylaw.

In a briefing to Bedford Town officials prior to the filing of the ENF, the Proponent indicated that no new fuel storage was intended within the Project. Presenters at the virtual information session on February 6, however, indicated that on-site fuel storage was now proposed. **The DEIR should include identification and method of such storage, and the measures to be taken to ensure protection of the surface waters and groundwater.**

## **Air Quality/Emissions**

The Air Quality section of the ENF (page 24) claims that the Project does not meet or exceed any review thresholds related to air quality. We caution the Proponent, however, that many of the pollution sources outlined by MEPA are not regularly tested at Hanscom Field, or are evaluated using modeling only and not sampling, based on the 2017 ESPR and the approved scope of the 2022 ESPR. We note in particular that the state's definition of "lead" under 301 CMR 11.03(8) only relates to lead paint, as measured by the proportion of residences built prior to 1960 (Appendix B, EJ Screen Report). In 2021, 55% of all operations at BED were single-engine piston aircraft. These older planes are one of the few remaining aircraft that still use leaded avgas, which means **residents of Bedford and surrounding towns are particularly vulnerable to lead emissions from aviation**. These emissions are not captured by MEPA's review and have not been measured in ESPRs, but are likely present in soil and groundwater at the airfield.

Additionally, given that the fueling concept is not yet defined, **modeling for air quality should include all potential fueling scenarios**: specifically, whether the trucks used to fuel aircraft onsite will be filled from offsite or onsite (on-airport) fuel farms. The filling from onsite fuel farms could represent a doubling of the opportunity for onsite HAP/VOC emissions.

More broadly, prevailing winds will transport ambient fumes from fueling operations and idling aircraft exhaust into an adjacent residential neighborhood. During construction, these winds may also transport dust and other sediments. **The DEIR needs to identify mitigation measures for airborne impacts**, both during construction and during future operations.

## **Wildlife**

The development site abuts both Core Habitat and Critical Natural Landscape as depicted on the MA Division of Fisheries & Wildlife biomap. **Wildlife impact analysis should be undertaken to evaluate the impacts to habitat for the many species of wildlife that live on the airport grounds**.

## **Other Environmental Concerns**

- The DEIR should address the status of any remaining contaminant mitigation affecting the former Navy Hangar site.
- New impervious surfaces created by additional pavement and rooftops, combined with the loss of existing vegetation, may yield heat island impacts. The DEIR should evaluate the microclimate created by the Project and identify possible mitigation measures.

## **III. ADDITIONAL CONSIDERATIONS**

### **Emergency Response**

We understand that discussions to date suggest Hanscom's internal Fire Department would respond to incidents involving aircraft and hangars, but Bedford's Fire Department would respond to incidents

involving civilians and office spaces. This is not an environmental issue for the ENF, but something that needs further negotiation, particularly with regard to local taxes and/or a PILOT agreement between the Proponent and the Town of Bedford.

### **Public Process and Notifications**

**We urge the Proponent to conduct proactive outreach to residents in Bedford and the other Hanscom area towns**, rather than wait for community members to request such a meeting (Appendix B, page 3). Given the significant impacts the Project will have on our community, during both construction and later daily operations, connecting with residents, boards, and professional staff early and often to understand our concerns will be key to a productive relationship in the long term. The Town is happy to coordinate with the Proponents and Massport to arrange such meetings.

### **Educational Partnerships**

The ENF lists as a project benefit a potential partnership with Bridgewater State University and its Aviation Management degree program. We note that Middlesex Community College (MCC), located in Bedford and Lowell, offers an associate's degree program in Aviation Maintenance Technology, in partnership with the National Aviation Academy at Hanscom Field. If the Proponent seeks local students to train and recruit for future employment opportunities, **we encourage a partnership with MCC as well.**

Again, we appreciate the opportunity to submit public comment on this project. We look forward to developing a productive relationship between the Proponent and the Town of Bedford as the permitting process continues.

Sincerely,

The Select Board of Bedford

Emily Mitchell, chair; Bopha Malone, clerk; Margot Fleischman, Shawn Hanegan, and Edward Pierce

Office of the Bedford Town Manager  
Bedford Department of Public Works  
Bedford Planning Department  
Bedford Fire Department  
Bedford Code Enforcement Department  
Bedford Health and Human Services Department  
Bedford Housing & Economic Development Department

Cc: State Representative Kenneth Gordon  
State Senator Michael Barrett  
Christopher Eliot, Chair, Hanscom Field Advisory Commission

**From:** [Mandy Patrick](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 6:47:00 PM

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**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

I am writing to express my strong opposition to the proposed expansion of Hanscom Airfield. We are in the midst of a climate crisis brought on by rising carbon dioxide levels. It is unconscionable to expand access to private jets for the wealthy few at the expense of the health and habitability of our planet. There are claims that the expansion might actually reduce air traffic through a reduction in livery flights. This may be the case short-term, but it's hard to imagine that the expansion won't lead to increases over the long-run. I would very much like to see data showing how this project is compatible with the goal of achieving net zero carbon emissions by 2050.

In addition to my concern about climate change impacts, I am extremely concerned about the impact of increased air travel in terms of noise and air quality in the neighborhoods surrounding Hanscom. These neighborhoods include a number of sensitive areas.

- North Lincoln, including the Battle Road Farm development, where 48 of 120 units are designated as affordable housing, is an environmental justice community.
- Great Meadows National Wildlife preserve is home to the largest genetically distinct populations of threatened Blanding's turtle in the northeast.
- Minuteman National Park is an important historic site visited by tourists, school groups, and walkers.

We need guarantees in place that the Hanscom expansion will not harm protected wildlife, will not detract from educational opportunities, enjoyment of, and tourist revenue from historic sites, and will not put an unfair burden on vulnerable members of our community.

Sincerely,  
Amanda Patrick  
52 Martha Point Rd  
Concord, MA 01742



**From:** [Amy Cook-Wright](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 10:35:00 PM

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Dear Mr. Strysky,

I am writing to you with alarm and grave concern over the proposal to add 27 airplane hangers to Hanscom. I've lived on Elm Brook Lane in Concord for 21 years. In that time air traffic has quadrupled in my estimation. We live near important historical sites, and protected wetlands (and the animals within). There are elderly, medically complex/vulnerable people, and children here. We are already at risk due to chemical run off and air pollution from the airport and military base. We implore you to block this proposal as it is dangerous and unhealthy for the many vulnerable families living within a five mile radius of the proposed build site.

Sincerely,  
Amy Cook-Wright, MSW  
Concord, MA

[Sent from Yahoo Mail on Android](#)

**From:** [ANDREW PANG](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Comments on EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 5:28:29 PM

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Dear Mr. Strysky:

Please accept this communication as part of the public comments for **EEA #16654: L.G. Hanscom Field North Airfield Development ENF.**

Lest MEPA and MassPort assume that there is unanimous opposition to this proposal among residents of the adjacent towns, **I write as a Lincoln resident in support of the proposal.** For twenty (20) years, my family and I have lived less than one mile from Hanscom Field and although we regularly hear aircraft noise from operations there, it is not frequent, usually brief, and usually not intrusive.

I support the proposal because I believe that it will reduce the instances of wasteful "ferry flights" currently used to bring aircraft to Hanscom that cannot be hangared there. The reduction in ferry flights will allow increased usage of Hanscom without increasing the number of flight operations, and will reduce emissions from these extra ferry flights.

I also support the proposal because I do not believe that flight operations damage or significantly affect the various historical properties in the vicinity and have seen no evidence by any of the parties who claim such damage and risk. There are historical properties next to many airports, including major metropolitan airports, across the U.S. and around the globe. They coexist without problem and this objection is not founded in facts.

I also support the proposal because I expect we will see a transition to electrified smaller aircraft (the kind that use Hanscom) in the next 10-20 years, much sooner than we will see the electrification of large, commercial aircraft. This transition will reduce the noise and emissions from operations at Hanscom, despite more flight operations.

Parties who cite the (very real) phenomenon of climate change as a reason to oppose this plan seem deluded in thinking that by stopping it, they will forestall the growth in volume of flights. That simply isn't so. As population grows and the economy expands, there will be more flights. Aircraft need to be based and housed somewhere. Hanscom is New England's second-busiest airport and is close to population centers where passengers live and work. This is the logical place for this project.

I realize that voices in favor of this project may be few. Some residents aren't aware of the proposal; some don't care; and some may not speak up for fear of the

opprobrium of their louder, insistent neighbors in opposition. The anti-proposal arguments put forth seem largely to be well-meaning but naive in their understanding of what will happen in the absence of this project or short-sighted in their picture of the future of civil aviation and technological evolution. At worst, some arguments are merely attempts to rationalize "NIMBY" attitudes. I hope these will not prevail in the review and approval process.

Very truly yours,  
Andrew S. Pang  
Four Brooks Hill Road  
Lincoln, Mass. 01773

**From:** [Anne Sobol](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Sobol comment on EEA #16654: L.G. Hanscom Field North Airfield Development  
**Date:** Tuesday, February 14, 2023 4:26:59 PM

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ANNE BUXTON SOBOL  
10 Beaver Pond Road  
Lincoln, MA 01773  
[anne.sobol@gmail.com](mailto:anne.sobol@gmail.com)  
(504) 812-2534

February 14, 2023

Alexander Strysky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
[Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)  
(857) 408-6957

Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky:

The record submitted provides no documentation for the need for what appears to be a speculative commercial project.

The expansion of private jet traffic at Hanscom is inconsistent with our local efforts to reduce the use of fossil fuels and to protect the environment.

A fuel tank farm will endanger the residential neighborhood around the proposed project.

The expansion of emissions-heavy, private jet traffic will despoil natural habitat and wildlife in the Great Meadows National Wildlife Preserve and the Minute Man National Historical Park. It also endangers human beings enjoying these preserves.

Whose interests does MassPort represent? Its own financial interests at the expense of local Massachusetts citizens? The interests of speculative commercial businesses at the expense of local Massachusetts citizens, their families, and their children?

The MassPort website states that MassPort "is dedicated to the vibrant neighborhoods around us." If that is true, MassPort should not be promoting the expansion of the private jet facility at Hanscom.

Expanding facilities for private jet usage is inconsistent with the goals set forth by MassPort in its Climate Action Plan: Net Zero by 2031.

Sincerely,

Anne Buxton Sobol

**From:** [Apu Chatterjee](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Strongly oppose Hangar expansion of Hanscom Airport  
**Date:** Tuesday, February 14, 2023 1:32:19 PM

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Dear Mr Strysky,

I am a Bedford resident living close to Hanscom Airport. I strongly oppose the new plans for expansion of the Hangar space at Hanscom Airport as this will adversely affect the life of thousands of people by contributing more to the air, noise and water pollution that already exists.

This airport sits in the middle of a residential neighborhood. Over the last 7-8 years the disturbance created by the increasing flight operations from Hanscom Airport has significantly affected our daily life. Loud noises from engine warm ups, take off and landing noises at night, fumes from aircraft exhaust and increased volume of traffic had created enough trouble already.

A few years back some trees were removed from Hartwell Town Forest next to the airport (which is supposed to be a conserved land) which affected the animals living in the forest. We do see an increasing number of animals coming out in the residential neighborhood than before.

This expansion plan will not only destroy the peace of residents , it will also have a huge impact on the local wildlife.

I personally, and on behalf of several of my neighbors, would strongly recommend not to proceed with this Hangar expansion plan.

Thank you,  
Aparajita Chatterjee

**From:** [jrw050@aol.com](mailto:jrw050@aol.com)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom  
**Date:** Tuesday, February 14, 2023 6:48:45 PM

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Dear Mr. Strysky,

I listened to the Hanscom discussion on Zoom.

I was shocked that Massachusetts has the goal to reduce fossil fuels by 2035 and at the same time is entertaining the proposal to support more ferry flights at Hanscom Field. It sounds like a plan that will contribute to the environmental disaster which is imminent. It is certainly not a consistent message.

Please listen to the scientists.

Sincerely,

Barbara Williams

**From:** [lincolnmanagement@verizon.net](mailto:lincolnmanagement@verizon.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** North Airfield Expansion public comment - EEA#16654  
**Date:** Tuesday, February 14, 2023 5:34:09 PM  
**Attachments:** [KBED traffic 2.11.23.pdf](#)

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Dear Mr. Strysky,

I have attached an example day of Hanscom traffic for your information. Massport's goal is to expand the airfield, these traffic numbers will not decrease.

Hanscom aircraft impact those living in "Hanscom's Standard Flight Training Areas," living under the flight paths (departure and arrival) and the neighbors of the airfield. The new project will not serve a transportation greater good as so few are using private aircraft for their travel needs.

There has been no known coverage to me of this project by major MA news outlets such as WBZ or the Boston Globe/Herald or newspapers serve that region such as the Lowell Sun. Massport's outreach has been poor.

There will be wildlife impacts and human health impacts from noise and emissions.

Thank you,  
Bobbi Eliades  
Ayer, MA



# PlaneFence

## Show aircraft in range of [KX1T-Dev monitoring KBED](#) ADS-B station for a specific day

### ▼ Executive Summary

- Last update: Feb 12, 2023 23:59:26 EST
- Maximum distance from [42.471°N -71.289°E](#): 3 nm
- Only aircraft below 5000 ft are reported
- Data extracted from 2398949 [ADS-B messages](#) received since midnight today
- Please note that the reported station coordinates and the center of the circle on the heatmap are rounded for privacy protection. They do not reflect the exact location of the station.
- Additionally, click [here](#) to visit Plane Alert: a watchlist of aircraft in general range of the station.

► Click on the triangle next to the header to show/collapse the section

### ▼ Flights In Range Table

- Click on the Transponder ID to see the full flight information/history (from [AdsbExchange](#))
- Click on the Flight Number to see the full flight information/history (from [FlightAware](#))
- Click on the Owner Information to see the FAA record for this plane (private, US registered planes only)
- Minimum altitude is the altitude above local ground level, which is 134 ft MSL.
- See a list of aircraft matching the station's Alert List [here](#)
- Press the header of any of the columns to sort by that column.

No.	Transponder ID	Flight	Airline or Owner	Time First Seen	Time Last Seen ▼	Min. Altitude	Min. Distance	Notified
284	<a href="#">A0B2BD</a>	<a href="#">N144NE</a>	<a href="#">Boston MedFlight</a>	2023/02/12 23:58:07	2023/02/12 23:58:40	641 ft AGL	0.77 nm	no
283	<a href="#">A88700</a>	<a href="#">DAL8844</a>	Delta Air Lines	2023/02/12 22:51:09	2023/02/12 22:51:19	641 ft AGL	2.16 nm	discord
282	<a href="#">AC1058</a>	<a href="#">N877AA</a>	<a href="#">FLX FLYERS</a>	2023/02/12 22:32:10	2023/02/12 22:33:51	791 ft AGL	0.62 nm	discord
281	<a href="#">A6C516</a>	<a href="#">EDG535</a>	Jet Edge International	2023/02/12 21:59:34	2023/02/12 22:04:10	616 ft AGL	1.97 nm	discord
280	<a href="#">AAE789</a>	<a href="#">WAL9801</a>	Western Arctic Air	2023/02/12 21:40:40	2023/02/12 21:40:54	591 ft AGL	2.17 nm	discord
279	<a href="#">A4EDC2</a>	<a href="#">N4167L</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 21:24:12	2023/02/12 21:27:48	266 ft AGL	1.05 nm	discord
278	<a href="#">A2F5B6</a>	<a href="#">USC225</a>	AirNet Express	2023/02/12 20:52:11	2023/02/12 20:55:35	666 ft AGL	2.15 nm	discord
277	<a href="#">A08046</a>	<a href="#">EJA123</a>	NetJets	2023/02/12 20:52:06	2023/02/12 20:52:50	841 ft AGL	0.59 nm	discord
276	<a href="#">ABAF6</a>	<a href="#">N852ND</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 20:17:12	2023/02/12 20:18:25	766 ft AGL	0.8 nm	discord
275	<a href="#">A84F07</a>	<a href="#">EJA634</a>	NetJets	2023/02/12 20:16:14	2023/02/12 20:17:06	766 ft AGL	0.52 nm	discord
274	<a href="#">A0B2BD</a>	<a href="#">N144NE</a>	<a href="#">Boston MedFlight</a>	2023/02/12 19:51:14	2023/02/12 19:51:56	716 ft AGL	1.14 nm	discord
273	<a href="#">A1C26E</a>	<a href="#">N212RG</a>	<a href="#">THK HOLDINGS</a>	2023/02/12 19:29:18	2023/02/12 19:29:39	516 ft AGL	2.17 nm	discord
272	<a href="#">A6R4B7</a>	<a href="#">LXJ531</a>	Bombardier Business Jet Solutions	2023/02/12 19:13:01	2023/02/12 19:13:23	466 ft AGL	2.06 nm	discord
271	<a href="#">A3C180</a>	<a href="#">N341EY</a>	<a href="#">EDY AVIATION</a>	2023/02/12 19:08:19	2023/02/12 19:08:38	1291 ft AGL	1.37 nm	discord
270	<a href="#">AC1058</a>	<a href="#">N877AA</a>	<a href="#">FLX FLYERS</a>	2023/02/12 19:02:01	2023/02/12 19:04:37	466 ft AGL	0.86 nm	discord
269	<a href="#">A57A9D</a>	<a href="#">VNT452</a>	Avient Air Zambia	2023/02/12 18:58:52	2023/02/12 18:59:07	541 ft AGL	2.02 nm	discord
268	<a href="#">A3C180</a>	<a href="#">N341EY</a>	<a href="#">EDY AVIATION</a>	2023/02/12 18:29:40	2023/02/12 18:55:50	91 ft AGL	0.79 nm	discord
268	<a href="#">A11D1A</a>	<a href="#">N171CD</a>	<a href="#">BILINSKI EDWARD</a>	2023/02/12 18:49:16	2023/02/12 18:49:22	666 ft AGL	0.74 nm	discord
267	<a href="#">A248F9</a>	<a href="#">N2462T</a>	<a href="#">EAGLE FAST AVIATION</a>	2023/02/12 18:34:20	2023/02/12 18:37:32	2266 ft AGL	0.24 nm	discord
265	<a href="#">A23ECF</a>	<a href="#">N2439Z</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 18:13:45	2023/02/12 18:17:20	616 ft AGL	1.0 nm	discord
264	<a href="#">A2FA4E</a>	<a href="#">N291MK</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 18:12:16	2023/02/12 18:14:24	591 ft AGL	0.64 nm	discord
263	<a href="#">A635DA</a>	<a href="#">KPO5</a>	NXT Jet	2023/02/12 18:07:20	2023/02/12 18:07:40	566 ft AGL	2.16 nm	discord
262	<a href="#">AA1960</a>	<a href="#">N75TG</a>	<a href="#">MDA CHARTER</a>	2023/02/12 18:04:58	2023/02/12 18:05:46	516 ft AGL	0.71 nm	discord
261	<a href="#">ABC8CE</a>	<a href="#">JAS82</a>	Jet Aviation Flight Services	2023/02/12 17:58:49	2023/02/12 18:01:10	591 ft AGL	2.06 nm	discord
260	<a href="#">A1F3E1</a>	<a href="#">N225DB</a>	<a href="#">BANK OF UTAH</a>	2023/02/12 17:54:03	2023/02/12 17:54:37	616 ft AGL	0.74 nm	discord
259	<a href="#">A47FA3</a>	<a href="#">N3894F</a>	<a href="#">NORTH SHORE AERO CLUB</a>	2023/02/12 17:47:07	2023/02/12 17:48:42	2566 ft AGL	2.51 nm	discord
258	<a href="#">ADD1DD</a>	<a href="#">EJM99</a>	Executive Jet Management	2023/02/12 17:44:51	2023/02/12 17:45:04	541 ft AGL	2.16 nm	discord
257	<a href="#">A2768C</a>	<a href="#">VTE258</a>	Contour Airlines	2023/02/12 17:41:01	2023/02/12 17:41:41	691 ft AGL	0.73 nm	discord
256	<a href="#">AC0381</a>	<a href="#">HPK73</a>	Hopscotch Air Inc	2023/02/12 17:39:39	2023/02/12 17:40:55	2341 ft AGL	2.58 nm	discord
255	<a href="#">A58642</a>	<a href="#">N455SC</a>	<a href="#">CANVASBACK</a>	2023/02/12 17:38:13	2023/02/12 17:38:39	516 ft AGL	1.95 nm	discord
253	<a href="#">A2E1AB</a>	<a href="#">N285MK</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 17:31:27	2023/02/12 17:33:52	566 ft AGL	2.03 nm	discord
254	<a href="#">A1F3E1</a>	<a href="#">N225DB</a>	<a href="#">BANK OF UTAH</a>	2023/02/12 17:32:09	2023/02/12 17:32:48	616 ft AGL	2.09 nm	discord
252	<a href="#">A2CF2B</a>	<a href="#">N280ND</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 17:23:02	2023/02/12 17:23:54	466 ft AGL	2.28 nm	discord
251	<a href="#">A041B1</a>	<a href="#">N1154G</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 17:21:00	2023/02/12 17:21:47	666 ft AGL	2.09 nm	discord
250	<a href="#">ABAF6</a>	<a href="#">N852ND</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 17:17:00	2023/02/12 17:18:34	666 ft AGL	0.64 nm	discord
249	<a href="#">A102F8</a>	<a href="#">N1640X</a>		2023/02/12 17:15:38	2023/02/12 17:16:25	766 ft AGL	0.67 nm	discord
248	<a href="#">A32D82</a>	<a href="#">N3035D</a>	<a href="#">CHICKENWINGS</a>	2023/02/12 17:12:28	2023/02/12 17:14:03	2466 ft AGL	2.41 nm	discord
247	<a href="#">A4F947</a>	<a href="#">N42AA</a>	<a href="#">N42AA</a>	2023/02/12 17:11:54	2023/02/12 17:12:16	666 ft AGL	1.2 nm	discord
246	<a href="#">AC0381</a>	<a href="#">HPK73</a>	Hopscotch Air Inc	2023/02/12 17:09:28	2023/02/12 17:11:44	2341 ft AGL	0.07 nm	discord
245	<a href="#">AC1CAC</a>	<a href="#">EJM750</a>	Executive Jet Management	2023/02/12 17:09:21	2023/02/12 17:09:59	641 ft AGL	0.77 nm	discord
244	<a href="#">A1D745</a>	<a href="#">IWY218</a>	Sunset Aviation	2023/02/12 17:06:44	2023/02/12 17:07:35	541 ft AGL	1.7 nm	discord
242	<a href="#">A2BDF6</a>	<a href="#">N276ND</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 16:59:42	2023/02/12 17:04:47	66 ft AGL	0.66 nm	discord
243	<a href="#">A08046</a>	<a href="#">EJA123</a>	NetJets	2023/02/12 17:01:33	2023/02/12 17:01:42	516 ft AGL	2.16 nm	discord
241	<a href="#">AA31AF</a>	<a href="#">N756PY</a>	<a href="#">ASSOCIATED PILOTS</a>	2023/02/12 16:57:17	2023/02/12 16:58:41	866 ft AGL	0.98 nm	discord
240	<a href="#">A4F947</a>	<a href="#">N42AA</a>	<a href="#">N42AA</a>	2023/02/12 16:52:35	2023/02/12 16:53:20	366 ft AGL	1.4 nm	discord
239	<a href="#">AB05F2</a>	<a href="#">N8092H</a>	<a href="#">UNITED STATES AIR FORCE</a>	2023/02/12 16:48:35	2023/02/12 16:51:09	566 ft AGL	1.66 nm	discord
238	<a href="#">A52768</a>	<a href="#">LXJ431</a>	Bombardier Business Jet Solutions	2023/02/12 16:48:05	2023/02/12 16:48:15	491 ft AGL	2.16 nm	discord
237	<a href="#">A2768C</a>	<a href="#">VTE258</a>	Contour Airlines	2023/02/12 16:45:32	2023/02/12 16:46:15	266 ft AGL	1.31 nm	discord
236	<a href="#">A6A6F3</a>	<a href="#">N528DB</a>	<a href="#">DELTA BRAVO</a>	2023/02/12 16:43:05	2023/02/12 16:43:28	691 ft AGL	2.23 nm	discord
234	<a href="#">A531FD</a>	<a href="#">N434AC</a>	<a href="#">N434AC</a>	2023/02/12 16:38:59	2023/02/12 16:42:25	691 ft AGL	0.62 nm	discord
235	<a href="#">A28852</a>	<a href="#">N263ND</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 16:39:47	2023/02/12 16:39:57	566 ft AGL	2.24 nm	discord
233	<a href="#">A1E99F</a>	<a href="#">N222ND</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 16:34:41	2023/02/12 16:38:18	666 ft AGL	0.83 nm	discord
232	<a href="#">A23ECF</a>	<a href="#">N2439Z</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 16:34:20	2023/02/12 16:37:17	641 ft AGL	0.65 nm	discord
231	<a href="#">A28A3F</a>	<a href="#">N275ND</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 16:31:45	2023/02/12 16:36:56	566 ft AGL	1.57 nm	discord



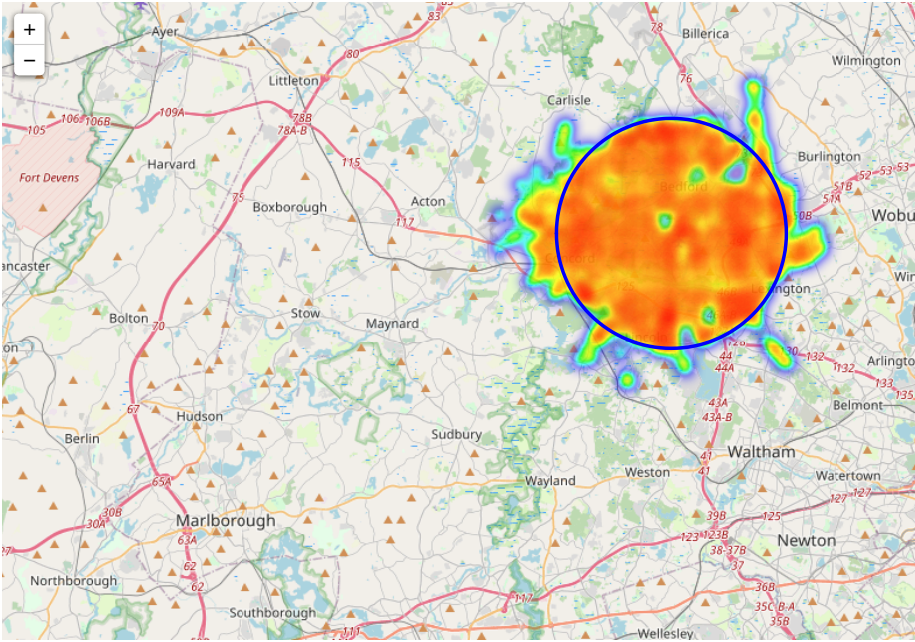




No.	Transponder ID	Flight	Airline or Owner	Time First Seen	Time Last Seen ▼	Min. Altitude	Min. Distance	Notified
11	<a href="#">A9B14E</a>	<a href="#">N72319</a>	<a href="#">WILLIAMS JOHN I JR</a>	2023/02/12 08:26:02	2023/02/12 08:27:10	466 ft AGL	1.47 nm	discord
10	<a href="#">ACB702</a>	<a href="#">N9182A</a>	<a href="#">PLANE NONSENSE</a>	2023/02/12 08:23:07	2023/02/12 08:23:13	766 ft AGL	0.83 nm	discord
9	<a href="#">A9B14E</a>	<a href="#">N72319</a>	<a href="#">WILLIAMS JOHN I JR</a>	2023/02/12 08:12:44	2023/02/12 08:15:42	366 ft AGL	0.55 nm	discord
8	<a href="#">AA77E9</a>	<a href="#">N774AF</a>	<a href="#">DEVCON AVIATION</a>	2023/02/12 08:07:01	2023/02/12 08:07:33	291 ft AGL	1.72 nm	discord
6	<a href="#">A8BF5F</a>	<a href="#">KAP7</a>	Cape Air	2023/02/12 07:59:26	2023/02/12 08:01:58	3366 ft AGL	0.38 nm	discord
7	<a href="#">AA7D09</a>	<a href="#">EJA775</a>	NetJets	2023/02/12 07:59:49	2023/02/12 08:00:23	691 ft AGL	1.14 nm	discord
5	<a href="#">A9B14E</a>	<a href="#">N72319</a>	<a href="#">WILLIAMS JOHN I JR</a>	2023/02/12 07:40:17	2023/02/12 07:41:47	666 ft AGL	0.98 nm	discord
4	<a href="#">A0B2BD</a>	<a href="#">N144NE</a>	<a href="#">Boston MedFlight</a>	2023/02/12 07:40:01	2023/02/12 07:40:10	841 ft AGL	2.68 nm	discord
3	<a href="#">AB3117</a>	<a href="#">KFS251</a>	Kalitta Charters	2023/02/12 07:35:37	2023/02/12 07:36:17	441 ft AGL	1.59 nm	discord
2	<a href="#">A708EF</a>	<a href="#">EDG552</a>	Jet Edge International	2023/02/12 07:29:42	2023/02/12 07:30:12	591 ft AGL	1.14 nm	discord
1	<a href="#">A3E473</a>	<a href="#">USC101</a>	AirNet Express	2023/02/12 07:17:08	2023/02/12 07:17:33	441 ft AGL	2.2 nm	discord

▼ Heatmap

- This heatmap reflects passing frequency and does not indicate perceived noise levels
- The heatmap is limited to the coverage area of PlaneFence, for any aircraft listed in the table above



Leaflet | Leaflet.heat, © OpenStreetMap contributors, docker:kk1/planevence, OpenAIP.net

▼ Historical Data

Today: [html](#) - [csv](#) | 11-Feb-2023: [html](#) - [csv](#) | 10-Feb-2023: [html](#) - [csv](#) | 09-Feb-2023: [html](#) - [csv](#) | 08-Feb-2023: [html](#) - [csv](#) | 07-Feb-2023: [html](#) - [csv](#) | 06-Feb-2023: [html](#) - [csv](#) | 05-Feb-2023: [html](#) - [csv](#)

Additional dates may be available by browsing to [planevence-yymmdd.html](#) in this directory.

PlaneFence 5.21-release is part of [KX1T's PlaneFence Open Source Project](#), available on GitHub. Support is available on the #Planevence channel of the SDR Enthusiasts Discord Server. Click the Chat icon below to join. Build: main\_(1d9b64c)\_23-01-25-00:55:48UTC

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[build](#) [passing](#) [docker pulls](#) [635k](#) [image size](#) [156 MB](#) [chat](#) [209 online](#)

**From:** [Brian Hough](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 4:04:45 PM

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Mr. Alexander Strysky  
MEPA Office 2-14-23  
[100 Cambridge St., Suite 900](#)  
[Boston, MA 02114](#)  
[Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)

RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

I have been a resident of Bedford, MA for the past 16 years. We live near the north airfield side of Hanscom Airport in a neighborhood of single family homes with many families with children. I myself have 5. I strongly oppose this massive expansion project that will have a severe negative impact on the health and quality of life of children and families as well as the environment. Premium air travel for a few corporate elite at the expense of the health of our children, families and our environment is unconscionable.

This airport expansion is a colossal step backwards in our efforts against climate change, an existential threat to our planet. This expansion negates all the efforts Massachusetts has made towards reducing our carbon footprint. There is a vast amount of data on the impact of air and noise pollution on our children and our environment. This expansion project, over a 50% expansion in square footage, will result in children being exposed to lead and other carcinogenic emissions. Of particular concern are children who live within 5 miles of the expansion, including the hundreds of children who play at the athletic fields located directly across the street from the proposed expansion project.

Massachusetts has been leading the way to reduce our carbon footprint. As we have seen change at such an accelerated pace, this is no longer climate change, it is climate catastrophe. To propose an expansion of this magnitude as we face an unprecedented existential crisis of climate catastrophe is profoundly irresponsible, disappointing and dangerous. This expansion is proposed in a densely populated area with families with young children in close proximity. If we allow this expansion, then we are failing our children and our planet.

By Massport's own admission previously, the goals of this project are to increase profitability of the airport and to provide private jet travelers a more luxurious and private travel experience. This expansion is a money grab catering to the corporate elite at the expense of children, families and the environment.

Reference is made to the letter HFAC submitted in opposition to this expansion project and all comments incorporated herein. Additionally, please find concerns below including but not limited to the following:

- Increased jet traffic, carbon, lead & other poisonous gas emissions, and noise, including jet engine startups, taxiing and maintenance
- The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase.
- Health and safety effects to our children and families, living close to the airport, in particular, for all kids playing on The Edge fields
- The overall impact of this airport on climate change is certain to be harmful to our planet
- There will be aircraft refueling (possibly with underground tanks) directly over an aquifer and yards away from Hartwell Road
- There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced
- Over 34 acres of forest with mature trees will be cleared and paved over, creating an overheated microclimate
- Hanscom Field adjoins Great Meadows National Wildlife Preserve. Therefore, this project will endanger protected wildlife
- There will be increased road traffic (including trucks) both pre and post construction along with air contamination during construction
- There will be huge water runoff in storms (with some fuel contamination)
- There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments
- This is for the benefit of corporate executives and companies that can afford to buy and use private jets

Based upon the aforementioned concerns, my family and I strongly oppose the North Airfield Development project.

Sincerely,  
Brian Hough  
[25 Liberty Road](#)  
[Bedford, MA 01730](#)

**From:** [Caitlin Selle](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Opposition to Hanscom Filed Expansion  
**Date:** Tuesday, February 14, 2023 4:46:52 PM

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Hello, Alexander -

My husband and I are Concord residents and strongly oppose the proposed expansion of Hanscom Field. Our community, and the planet, need less air traffic, not more, and more trees, not fewer. Our community should not have to indulge the whims of private jet travelers and puddle jumpers as they pollute our backyards with their noise.

Thank you very much for your time.

Caitlin Selle and Alec Walker  
17 Grant Street  
Concord, Mass



**From:** [Carol Boris](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** North Airfield development ENF  
**Date:** Tuesday, February 14, 2023 12:02:30 PM

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I am writing to say that I am opposed to the development at Hanscom Field. The environmental impact on surrounding towns, air, water and noise to say nothing of a 'fuel farm' renders the idea of such a development without merit. The communities around Hanscom will suffer because of the ability of the wealthy who can afford planes to override any other concerns.

Carol Boris, 312 Hemlock Circle, Lincoln, MA

**From:** [themonties.montie.net](mailto:themonties.montie.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Formal objection to EEA #16654: L. G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 10:59:01 PM

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Dear Mr. Strysky,

I'm writing to express my formal opposition to the recently proposed expansions at Hanscom Airfield.

The concerns are many—increased noise, increased air and road traffic, encroachment on habitat, jets flying over national treasures like Minute Man National Historic Park and Walden Pond, wetlands contamination from de-icing chemicals and related run-off, reduction of natural carbon capture in lieu of tarmac... and yet in the end, the icing on the cake is this:

According to a [study by Transport & Environment](#), private jets are 5 to 14 times more polluting than commercial planes (per passenger), and 50 times more polluting than trains. In 2018, [50% of all aviation emissions were caused by only 1% of the world's population](#).

I've had the experience of being an invited guest on a small jet leaving from Hanscom—and I'll tell you: it's asinine. And I'll never do it again. There is nothing more ridiculous than seeing the 1% "feel special" while they are pandered to at the expense of every resident and creature they blast over. I witnessed it. How quaint that they drive their Tesla S to the runway—as if that makes up for the carbon output of flying directly from Hanscom to St. Bart or the Super Bowl (true examples).

This project is wrong. If there were public interest at heart, the land in question would be turned into affordable housing instead.

Thanks for receiving my concerns and adding my decent to the record.

Best

Carolyn Montie  
Lincoln, MA

**From:** [Cheryl Mandler](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Cc:** [Hoffer, Melissa \(GOV\)](#)  
**Subject:** North Airfield Hangar Development Proposal  
**Date:** Tuesday, February 14, 2023 1:33:20 PM

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February 14, 2023

Mr. Alexander Stryisky, MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: North Airfield Hangar Development Proposal

Dear Mr. Stryisky:

I am writing in strong opposition to the proposed 49 acre North Airfield hangar development proposed by Runway Realty Ventures, LLC and North Airfield Ventures, LLC in their January 23, 2023 ENF.

The premise of this project is that it will result in a net benefit to the environment by limiting the number of ferry flights required by aircraft due to insufficient space currently available at Hanscom Field.

The proponent has provided no evidence that this primary premise of their rationale for development is valid. It is possible that the proposed hangars rather than decreasing ferry flights will instead encourage more operators to base at Hanscom. The cost of this enticement in environmental terms is massive and in direct contradiction to Massport's own Master Plan of 1978. It also goes counter to Massport's commitment to have zero greenhouse gas impacts by 2031; a commitment the proponent even cites in their ENF.

To make matters worse, this development is designed to attract category 4 large aircraft. These aircraft have a far greater carbon footprint and are incompatible with the type of aircraft Hanscom generally serves.

The environmental impacts of this development will adversely affect this largely suburban to rural environment. Not only will this development add parking for 240 cars, it will pave over 39 acres of land that's currently woodlands and wildlife habitats. While the proponent makes a case that they will be LEED gold certified, install solar panels and plan for storm water runoff, it is impossible to make a case that paving 39 acres will improve flooding risks for an area already at high risk of urban flooding. The impacts upon a largely wooded suburban environment are tremendously negative.

This project will be detrimental to any climate change goals. On behalf of my neighborhood do not permit this project to proceed as presented.

Sincerely,

Cheryl Mandler  
58 Mallard Dr., Concord, MA 01742

Sent from my iPad



**From:** [CP](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Expansion is a Good Idea  
**Date:** Tuesday, February 14, 2023 6:50:23 AM

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I like the idea of expanding Hanscom services to bring more prosperity to the Metro West Boston area. As a resident of Lincoln, MA and frequent user of Hanscom services (Navy Veteran), I want this project to move forward.

Thank you,

Chris Pace  
80 Davison Drive  
Lincoln, MA

**From:** [Christie Martin](#)  
**To:** [Strysky, Alexander \(EEA\)](#); [Barrett, Mike \(SEN\)](#); [kenneth.gordon@mahouse.gov](mailto:kenneth.gordon@mahouse.gov)  
**Cc:** [Jimmy Martin](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 5:48:42 PM

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For all the reasons listed below, we hardly oppose this project.

Christie and James Martin  
11 Selfridge Rd, Bedford, MA 01730

On Tue, Feb 14, 2023, 5:43 PM Christie Martin <[christiemartin2009@gmail.com](mailto:christiemartin2009@gmail.com)> wrote:  
Just sending a message in line with below. I oppose this project please do not support it

Christie Martin  
11 Selfridge Rd, Bedford, MA 01730

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BEDFORD, CONCORD, LINCOLN, and LEXINGTON RESIDENTS - WE NEED TO SPEAK UP! PUBLIC COMMENTS DUE [TODAY, Feb 14] Hi community! As many of you are aware, Massport has plans for a MAJOR expansion of Hanscom jet hangar space off Hartwell Road. The more I read about the project, the more concerned I am and I think we all should be concerned about the impacts on the environment and the impact on our health. The proposed project will include: Addition of 27 jet aircraft hangars, office space, two parking lots, and a huge amount of (asphalt) ramp space. This will allow as many as 50-80 additional corporate jets to be housed at Hanscom, from 8-passenger Learjets to much larger tri-jets. By Massport's own admission, these hangars are all designed for private corporate clients to provide "a more comfortable flying experience" away from the public. The project size is breathtaking: an 80% increase in corporate hangar space at Hanscom over the existing three providers of these services including: 50 acres (88 football fields) total project area. Potential Impacts: · Increased jet traffic, carbon & poisonous gas emissions, and noise, including jet engine startups. · There will be health and safety effects to our children and us, living so close to the airport. · There will be aircraft refueling (possibly with underground tanks) · There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced. · A huge amount of forest with mature trees will be cleared and paved over. · There will be increased road traffic (including trucks) during construction and after. · There may be fueling trucks driving on Hartwell Road and vicinity, as Massport has not committed to preventing this. · There will be huge water runoff in storms (with some fuel contamination) without a clear indication of how this will be mitigated. · There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments. ·

This is for the benefit of corporate executives and companies that can afford to buy and use private jets. It is hard to see how this will benefit the public. RESIDENTS - WE NEED TO SPEAK UP! HOW YOU CAN HELP 1. Send a Public Comment to BY FEBRUARY 14TH Comments may be submitted to [alexander.strysky@mass.gov](mailto:alexander.strysky@mass.gov) or via the MEPA Public Comments Portal

(<https://eeaonline.eea.state.ma.us/EEA/PublicComment/Landing/>) Please use this reference info in the subject line of your Comment: "RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF" General suggestions for submitting a Comment:

- It can be long or short, formal or informal.
- If you have questions, submit them – and ask for explanations and/or further data.
- If you have objections or concerns, submit them.
- If you don't know what to write about, read the Bedford Citizen news story (<https://www.thebedfordcitizen.org/2023/02/fuel-farm-planned-for-new-hanscom-hangar-complex/>) to see what issues and concerns other citizens' & elected reps have raised; if any resonate, echo them.

By topic: Some impacts of the proposed expansion that you may wish to address --

- Increased aircraft operations and ground travel
- Noise, air, water, and soil pollution
- Public health
- Environmental Justice populations
- Climate change
- Wildlife
- Mature tree removal
- and more

Above all, please submit SOMETHING to help send a clear collective signal across the board that this proposed development is unacceptable on many levels. 2. WRITE/CALL YOUR ELECTED OFFICIALS Write to your MA state reps & senators to voice your opposition to this project that does not benefit the community and with the most intensive carbon-emitting mode of travel (per seat mile). Let them know it is environmentally tone-def and directly opposes the climate change directives and mandates that the Commonwealth of Massachusetts has advocated and proposed.

- State senator Mike Barrett (phone or email): [Mike.Barrett@masenate.gov](mailto:Mike.Barrett@masenate.gov) (617-722-1572)
- State representative Ken Gordon (phone or email): [Ken.Gordon@mahouse.gov](mailto:Ken.Gordon@mahouse.gov) (617-722-2240)
- U.S. senators (for Massport-owned land): Ed Markey and Elizabeth Warren
- U.S. representative (for Massport-owned land): Seth Moulton and Katherine Clark

WE CAN FIGHT THIS!

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To view this discussion on the web visit <https://groups.google.com/d/msgid/uubedford-anno/626E8B5D-BC25-4912-BC9A-A16C2E3BE782%40gmail.com>.

**From:** [Christie Martin](#)  
**To:** [Strysky, Alexander \(EEA\)](#); [Barrett, Mike \(SEN\)](#); [kenneth.gordon@mahouse.gov](mailto:kenneth.gordon@mahouse.gov)  
**Subject:** comment on Hanscom Hangar  
**Date:** Tuesday, February 14, 2023 5:45:17 PM

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Just sending a message in line with below. I oppose this project please do not support it

Christie Martin  
11 Selfridge Rd, Bedford, MA 01730

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BEDFORD, CONCORD, LINCOLN, and LEXINGTON RESIDENTS - WE NEED TO SPEAK UP! PUBLIC COMMENTS DUE [TODAY, Feb 14] Hi community! As many of you are aware, Massport has plans for a MAJOR expansion of Hanscom jet hangar space off Hartwell Road. The more I read about the project, the more concerned I am and I think we all should be concerned about the impacts on the environment and the impact on our health. The proposed project will include: Addition of 27 jet aircraft hangars, office space, two parking lots, and a huge amount of (asphalt) ramp space. This will allow as many as 50-80 additional corporate jets to be housed at Hanscom, from 8-passenger Learjets to much larger tri-jets. By Massport's own admission, these hangars are all designed for private corporate clients to provide "a more comfortable flying experience" away from the public. The project size is breathtaking: an 80% increase in corporate hangar space at Hanscom over the existing three providers of these services including: 50 acres (88 football fields) total project area. Potential Impacts: · Increased jet traffic, carbon & poisonous gas emissions, and noise, including jet engine startups. · There will be health and safety effects to our children and us, living so close to the airport. · There will be aircraft refueling (possibly with underground tanks) · There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced. · A huge amount of forest with mature trees will be cleared and paved over. · There will be increased road traffic (including trucks) during construction and after. · There may be fueling trucks driving on Hartwell Road and vicinity, as Massport has not committed to preventing this. · There will be huge water runoff in storms (with some fuel contamination) without a clear indication of how this will be mitigated. · There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments. · This is for the benefit of corporate executives and companies that can afford to buy and use private jets. It is hard to see how this will benefit the public. RESIDENTS - WE NEED TO SPEAK UP! HOW YOU CAN HELP 1. Send a Public Comment to BY FEBRUARY 14TH Comments may be submitted to [alexander.strycky@mass.gov](mailto:alexander.strycky@mass.gov) or via the MEPA Public Comments Portal (<https://eeaonline.eea.state.ma.us/EEA/PublicComment/Landing/>) Please use this reference info in the subject line of your Comment: "RE: EEA #16654: L.G. Hanscom



Field North Airfield Development ENF“ General suggestions for submitting a Comment: ◦ It can be long or short, formal or informal. ◦ If you have questions, submit them – and ask for explanations and/or further data. ◦ If you have objections or concerns, submit them. ◦ If you don't know what to write about, read the Bedford Citizen news story (<https://www.thebedfordcitizen.org/2023/02/fuel-farm-planned-for-new-hanscom-hangar-complex/>) to see what issues and concerns other citizens' & elected reps have raised; if any resonate, echo them. By topic: Some impacts of the proposed expansion that you may wish to address -- ◦ Increased aircraft operations and ground travel ◦ Noise, air, water, and soil pollution ◦ Public health ◦ Environmental Justice populations ◦ Climate change ◦ Wildlife ◦ Mature tree removal ◦ and more Above all, please submit SOMETHING to help send a clear collective signal across the board that this proposed development is unacceptable on many levels. 2. WRITE/CALL YOUR ELECTED OFFICIALS Write to your MA state reps & senators to voice your opposition to this project that does not benefit the community and with the most intensive carbon-emitting mode of travel (per seat mile). Let them know it is environmentally tone-def and directly opposes the climate change directives and mandates that the Commonwealth of Massachusetts has advocated and proposed. · State senator Mike Barrett (phone or email): [Mike.Barrett@masenate.gov](mailto:Mike.Barrett@masenate.gov) (617-722-1572) · State representative Ken Gordon (phone or email): [Ken.Gordon@mahouse.gov](mailto:Ken.Gordon@mahouse.gov) (617-722-2240) · U.S. senators (for Massport-owned land): Ed Markey and Elizabeth Warren · U.S. representative (for Massport-owned land): Seth Moulton and Katherine Clark WE CAN FIGHT THIS!

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To view this discussion on the web visit <https://groups.google.com/d/msgid/uubedford-anno/626E8B5D-BC25-4912-BC9A-A16C2E3BE782%40gmail.com>.

**From:** [Christine Size](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** No Hanscom development  
**Date:** Tuesday, February 14, 2023 11:19:48 AM

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**EEA #16654: L.G. Hanscom Field North Airfield Development ENF**

**Hello, I'm a Lincoln resident writing in objection to the proposed Hanscom development. This appears to be about as pure a money-grab as possible, without care for the environment and human impact. The use of corporate and private jets is disgustingly self-indulgent and should not be encouraged and supported due to their harm to the environment. Our destruction has to stop somewhere. How about stopping it over our preserved land where children play and live?**

**Thank you for your time.**

**Sincerely,**

**Christine Size**

--

Christine Size  
Elementary Math Coordinator  
Westwood MA Public Schools

--

Please be advised that the Massachusetts Attorney General has determined that email is a public record.

**From:** [chris.christinewojnar.com](mailto:chris.christinewojnar.com)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion  
**Date:** Tuesday, February 14, 2023 10:42:03 AM

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Hello, I have lived in west Bedford For almost 50 years, and there have been various issues that have come up around the airport.

I am very concerned about the level of expansion Massport is proposing. It will deeply impact the quality of life we have here. the private jet traffic will no doubt increase dramatically, and will impact not only Bedford and the surrounding towns with noise, but also be very disturbing to the places we go for quiet and hiking, such as Great Meadows, National Wildlife, Refuge, and Minuteman, National, Park Areas.

I am very much opposed to this expansion, not only for the increased traffic, the increased air traffic, but also the environmental impact that all of this will have for all of the people living in this area.

Please reconsider and think of all of us who live in this area, and what it will do to our lives.

Sincerely,

Christine Wojnar  
8 Putnam Rd., Bedford.

Sent from my iPhone

**From:** [Melissa Saalfield](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Kerry Lafleur](#); [Matthew Johnson](#); [markwg51@aol.com](#); [Monteleone, Simone](#); [Anna West Winter](#); [Kati Winchell](#); [brona.simon@sec.state.ma.us](#); [elizabeth.sherva@sec.state.ma.us](#); [Ryan Hanley](#); [Michael Capizzi](#); [Nancy Nelson](#); [Nancy Fresella-Lee](#); [Alan Bogosian](#); [Francesca Cataldo](#); [Ann Clifford](#)  
**Subject:** RE: Hanscom Field North Airfield Development - EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:34:46 PM

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Dear Mr. Strysky,

On behalf of the Concord Historical Commission, I wish to express our deep concern for the integrity of nationally important historical structures, landscapes and diverse cultural features that may suffer from the proposed expansion of Hanscom Field. Concord's history and its historic resources – particularly the North Bridge which is owned by the Town of Concord – are inextricably linked to the historical resources protected and honored by Minute Man National Historical Park which is adjacent to the airfield.

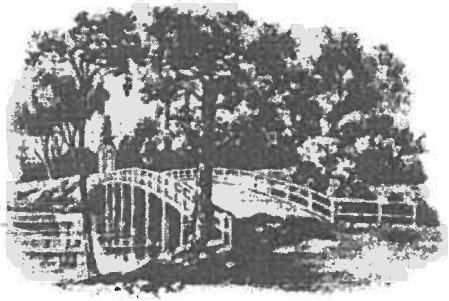
Among our concerns is the increased use of the Battle Road/Rte2A that may arise if this expansion is permitted. This road already suffers from heavy traffic as it serves as a principal entry point into the airfield. What so many fail to appreciate is that a portion of the road that runs through the national park overlays the actual route of the running battle which occurred on April 19, 1775 following the fight at the North Bridge as British troops retreated to Boston; it “set the hook” for the beginning of the American Revolution. Both English and colonial soldiers fought and died along this road. It is a battlefield. The casualties suffered here may not match the carnage of Gettysburg, but their significance cannot be ignored.

Additionally, sensitive archeological sites yet to be investigated, properly researched and protected may be greatly at risk. The likely increased use of the airfield will compound the existing noise and air pollution which affects not only the natural and historical resources of the Minute Man National Historical Park and our town, but detracts from the visitor experience. This region and the national park welcome over a million worldwide visitors annually. Visitors come to experience the park, canoe our rivers, and visit our historic homes to gain a better understanding of this unique area which has contributed so much to the American story.

We strongly oppose this project.

Sincerely,

Melissa C. Saalfield, Chair  
Concord Historical Commission



OLD NORTH BRIDGE

## TOWN OF CONCORD

TOWN HOUSE - P.O. BOX 535  
CONCORD, MASSACHUSETTS 01742

February 14, 2023

Mr. Alexander Stryisky, Environmental Analyst

Massachusetts Environmental Policy Act Office

100 Cambridge Street, Suite 900

Boston, MA 02114

**Re: Public Comment EEA #16654 – L.G. Hanscom Field North Airfield Development ENF**

Dear Mr. Stryisky,

This letter is in response to the Environmental Notification Form received by the Town of Concord. After attending the site visit on Monday, February 6<sup>th</sup> and the public meeting conducted via Zoom that same evening, the Concord Select Board offers the following observations, comments, and questions.

Hanscom Airfield is within the four communities of Bedford, Concord, Lincoln, and Lexington. These four communities exhibit intrinsic qualities of scenic, historic, recreational, cultural, archaeological, and natural features that are recognized for their national significance and considered representative, unique, irreplaceable, or distinctly characteristic of this area. Greatly valued by residents, these intrinsic qualities draw visitors from around the world seeking connections and inspiration from the American story. The federally owned Great Meadows Wildlife Refuge, the Minute Man National Historical Park and the Battle Road Scenic Byway are on a direct path with the east-west runway, as well as many cultural resources and open spaces that bring visitors to this region. As Hanscom Airfield has grown and expanded over the years, the incremental increases in vehicular traffic, aircraft traffic, noise, air pollution and so forth, has eroded the quality of life for residents and wildlife and diminishes the visitor

experience. The cumulative impact of these incremental increases adversely affects the natural, cultural, and historical resources of the communities.

The Draft Environmental Impact Report (DEIR) should include both qualitative and quantitative information that addresses questions of the incremental, direct, and cumulative impacts to the Concord community of not just the proposed development but the resulting increases in use at Hanscom resulting from the proposed development. The proponent has offered that the proposed development will reduce the number of 'ferry flights' and has implied that the number of overall flights will be reduced – guarantees of this reduction should be documented and realized. The DEIR should include a comprehensive public cost/public benefit analysis, addressing quality of life issues such as:

- Noise and Visual Intrusions – impacts to humans and to wildlife of the air traffic numbers resulting from the proposed development (including the frequency, volume, size of aircraft, and flight paths) and the disruption of biological rhythms, peace of mind, communication, foraging, navigation, and mating.
- Vehicular Traffic – increased traffic volumes (and potentially, speeds) on Route 62, which may affect pedestrian and bicyclist safety along this road, particularly since there is no sidewalk for a major length of the road corridor.
- Air Quality – increased aviation use at Hanscom may result in reduced air quality, particularly given changes in wind patterns resulting from climate changes. Also, the health impacts of lead added to the environment resulting from the use of leaded (aircraft) fuel should be quantified. What is the general direction of wind patterns in relation to sensitive receptors such as child-care facilities, affordable housing developments and similar sites?
- Climate Change – the increase in impervious pavement and the resultant loss of the woodland and grassland areas in the area proposed for development will create a "heat-island" effect that may impact surrounding neighborhoods and businesses without mitigation measures taken. Additionally, what is the condition of the existing soils in the area and what will be the effect of recharging groundwater resources by retaining stormwater on site? How will groundwater be protected in the event of a fuel spill or similar occurrence.
- Rare Species Impacts – the proposed development is immediately adjacent to mapped areas of Estimated and Priority Habitats, which may negatively impact rare wildlife. In addition, the flight path crosses many other mapped rare species habitats. The DEIR should evaluate the effects of increased noise and air pollution on resident, migratory, and overwintering wildlife species that occur in Concord (rare and otherwise).
- Carbon Footprint – The four communities encircling Hanscom are working to reduce their respective carbon footprints. The carbon footprint of the proposed use should be evaluated, including both direct impacts from new impervious surface,

construction materials and heating/cooling required for the new buildings, as well as increased aircraft fuel usage.

- Economic. Adverse effects of the increased air traffic diminish the very intrinsic qualities that attract tourists, impacting local economies.
- Public Benefit(s) – The primarily private nature of the proposed development benefits a few users while the adverse impacts will be borne by the public. Statements made during the presentation on Monday indicated that these new hangers would be a benefit through the reduction in the number of “ferry flights”; guarantees of this future performance should be provided. This statement should be supported with accurate numbers (how many such flights per day/week/month) and requests/reservations for the proposed hanger space. Other public benefits (implied or stated) should be documented and supporting information provided.

The Concord Select Board recognizes that the MEPA process is not a permitting process, but a means of assessing the environmental impacts of the proposed development. It is the responsibility of the proponents to provide complete and accurate information as part of the DEIR (Draft Environmental Impact Report) and FEIR (Final Environmental Impact Report) process, which will help inform those making decisions at different points in time. The questions and issues raised in this memorandum reflect the information obtained during the site visit and public meeting presentation. Further questions may arise with completion of the Draft Environmental Impact Report.

Sincerely,



Linda L. Escobedo,

Member of the Concord Select Board and Liaison to Hanscom Area Town Selectmen (HATS)

Cc: US Senator Edward Markey  
US Senator Elizabeth Warren  
US Representative Lori Trahan  
State Senator Michael Barrett  
State Representative Carmine Gentile  
State Representative Simon Cataldo  
Office of Governor Maura Healey  
Kerry Lafleur, Town Manager



**From:** [Corinne Doud](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 4:36:26 PM

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Testimony submitted to MEPA in regard to the Hanscom Hangar Project  
February 14, 2023

On behalf of Bedford Mothers Out Front, the chapter leadership team voted unanimously to oppose the proposed Hanscom Hangar Project during their February 13th meeting. We share the environmental concerns voiced by Senator Barrett and Representative Gordon during the public zoom call hosted by MEPA on February 6th. As mothers, we are deeply concerned about the effects on both health and climate of the increased fossil fuel emissions from more private jet traffic.

This proposal is not simply a shift away from the congestion at Logan Airport but will result in substantially increased air traffic across eastern Massachusetts. This is a step backward from the emission reduction goals passed by the state legislature. Emissions from all forms of transportation, not just road vehicles, are responsible for about 40% of our current emissions. Additional air traffic anywhere will only increase this percentage. How can we meet state goals to reduce emissions by 50% by 2030 and achieve net zero emissions by 2050 when we increase traffic here at Hanscom?

In addition to these critical climate concerns, we are also concerned about the increased risk of water contamination and the potentially damaging effects on the ecosystem of the planned development of open land. Operation of such a facility will almost inevitably have adverse effects on the surrounding ecosystem. As mothers and others who care passionately about the health and future of all children, we believe that the children across this region should not be further burdened by increasing environmental costs or health risks. We must protect the climate of their future and that of other vulnerable members of our society. Therefore, for all these reasons, we oppose the Hanscom Hanger project.

Thank you,  
Corinne Doud, member of Bedford Mothers Out Front Chapter Leadership Team  
4 Redcoat Road  
Bedford, MA 01730

**From:** [Craig Nicholson](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 2:05:45 PM

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Good Afternoon Mr. Strycky,

Thank you for coordinating the recent public meeting for the proposed North Airfield Development ENF (EEA #16654). I participated in the meeting as a resident of the Town of Lincoln. During the web meeting I submitted a couple of questions through the chat feature and appreciated that one of them was briefly discussed during the call. Unfortunately, I was in the midst of bed time with my children and was unable to raise my hand and vocally raise my second question/comment (which was also submitted via chat) and wanted to make sure that it would be entered into the record by way of the Public Comment request for this proposed project.

The proponent's representative indicated on the call that they are in the process of evaluating the soil conditions on site. As part of the MEPA analysis of the proposed project's environmental impacts, I respectfully request that in addition to the evaluation of soil for environmental contaminants, if not already planning to do so, the proponent undertake groundwater testing at the site as well as air quality monitoring both on-site and in surrounding communities, particularly in those areas with higher density residential developments that are in close proximity to Hanscom. The purpose of this monitoring should be to establish the baseline from which proposed emissions from the additional aircraft fueling, maintenance and inbound/outbound traffic would be modeled off of. It will be beneficial to understand how factors such as wind direction, air temperature, etc. will affect the movement of these emissions from the proposed expansion on and off of the premises.

In their proposal, the proponent identifies ferry flights and their proposed reduction as justification for their project without providing any concrete data on how many ferry flights occur each day and how the proposed project will result in a net decrease in flights through the reduction of these ferry flights. I would like to understand more about this as it seems like a key component of their environmental mitigation strategy. As part of the alternatives analysis it would be beneficial to understand what the impact would be if these ferry flights were prohibited in their entirety from occurring at Hanscom forcing the passengers of these flights to instead travel to the airport where their private aircraft is based vs. having their aircraft flown in/out empty.

In terms of the alternatives analysis, it appears that the only two alternatives currently under consideration are the project as proposed or no project at all. As mentioned above, it would be useful to understand what impact the ferry flights have on increased greenhouse gas emissions and what impact prohibiting them at Hanscom would have. In addition, as part of the alternatives analysis, I would like to propose that the proponent, through their collaboration with Massport, examine two additional alternatives - first, basing these proposed operations at an alternate Massport airport vs. Hanscom. As Logan is already set up to handle the larger aircraft that are proposed as part of this project, what would be the net overall impact by housing these operations at that location? Additionally, as one can assume that there is a desire

for re-use of the existing building on the proponents site, it would be beneficial to understand what environmental impacts would be associated with alternative uses of that structure such as research/development, industrial, commercial, etc. It is not clear to me if the MEPA process will allow for this type of alternatives analysis to be completed but, if this is within the purview of the MEPA process, I respectfully request that the project proponent be tasked with studying and modeling the environmental impacts associated with these alternative uses.

Thank you again for your assistance with this process. If I can provide additional clarification on any of the comments above, please don't hesitate to contact me.

Thank you,

Craig Nicholson  
Lincoln, MA

**From:** [Cynthia Frenkil](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [Mike Barrett](#)  
**Subject:** Comment on Hansom project  
**Date:** Tuesday, February 14, 2023 2:01:41 PM

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I am extremely worried that the proposed Hanscom expansion project will be detrimental to our current progress on climate, to Mass energy goals, and to our local environment (e.g. mature tree removal, wildlife, noise pollution).

As for local citizens, our public health will also be at risk with increased carbon and poisonous gas emissions and possible loss of water supply for the town of Bedford, not to mention the production of wastewater and storm runoff with possible fuel contamination.

I strongly second the comments my Senator Mike Barrett shared in the Monday, Feb 6 meeting that was hosted by MEPA. Please review them and consider them as part of this comment.

Given that the huge increase in jets and hangars are proposed for the benefit of private corporations and the very wealthy, there is no apparent value and benefit to the common citizen and thus, becomes a major environmental justice issue as well.

In sum, I oppose this project. There has not even been data collection to define the project nor an environmental impact study.

Cynthia Frenkil  
132 Jennie Dugan Rd.  
Concord, MA 01742  
978 505 7935

**From:** [David McCoy](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EAA#16654 Hanscom  
**Date:** Tuesday, February 14, 2023 4:45:21 PM

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Dear Mr. Strysky,

Hanscom's noise is a detriment to the town of Ayer. Airport expansion for the privileged will not benefit the environment where I live, nor will it further the State's efforts to improve climate resiliency. MassPort has been keeping residents in the dark about this project. Jet traffic will not decrease with this expansion. In 2017, I filmed a near collision between a KBED based aerobatics plane and a KBED in bound jet over my area.

To reduce noise and lead emissions from impacting the four surrounding towns, MassPort pushes loud flight school maneuvering away from Hanscom, out to areas like Ayer ("Training Area A, B & C").

Take time to watch a flight program such as [adsbexchange.com](https://adsbexchange.com) and [flightradar24.com](https://flightradar24.com) to view Hanscom's hugely negative impacts yourself.

Thank you for soliciting public comments.

David McCoy  
Ayer, MA

**From:** [Swain, David](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Re: Massport North Airfield Project (MEPA project 16654)  
**Date:** Tuesday, February 14, 2023 6:51:40 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[HanscomComment-Swain2.docx](#)

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Dear Mr. Strysky,

Several local naturalists requested to be signatories to the letter I sent you earlier today. I have amended the letter accordingly. Please delete the earlier version and replace it with the attached v2.

Do not hesitate to approach us with questions or requests for more local observational information.

Many thanks,  
David Swain

Dr. David Swain (he/him)  
Professor of English  
School of Arts and Sciences  
University College  
Southern New Hampshire University  
Manchester, NH 03106



---

**From:** Swain, David <D.Swain@snhu.edu>

**Date:** Tuesday, February 14, 2023 at 2:04 PM

**To:** Alexander.Strysky@mass.gov <Alexander.Strysky@mass.gov>

**Subject:** Massport North Airfield Project (MEPA project 16654)

Dear Mr. Strysky,

Please find attached a comment on MEPA project 16654 on behalf of the community of naturalists, birders, ornithologists, and concerned citizens in the Concord area. We are concerned about the likely impact the project, as proposed, will have on the Elm Brook watershed and the shrublands surrounding the west end of Hanscom, both of which host a wide variety of breeding birds (some rare and endangered) and migration and over-wintering habitat. The west end of Hanscom is (to birds) a locally rare combination of tundra and wetland habitat, but would become industrialized space (with accompanying noise, fuel storage, and likely PFAS leakage) with no adequate buffer zone between it and the wetland and shrublands. We provide a list of potentially affected birds (and two apex predators), and can supply historical observational data upon request. Based on our sense of the likely impact, we recommend the Alternative construction that would renovate the decrepit Navy hanger and develop its surrounding space.

Thank you for your attention,

David W. Swain

Dr. David Swain (he/him)

Professor of English

School of Arts and Sciences

University College

Southern New Hampshire University

Manchester, NH 03106





February 11, 2023

Alexander Stryisky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Stryisky@mass.gov  
(857) 408-6957

Dear Mr. Stryisky,

I and the undersigned welcome the opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development." We are an active community of naturalists, ornithologists, avid birders, and conservationists in the Concord area, and collectively we are concerned about the potentially disastrous impact of this project on wildlife, especially many sensitive and rare bird species that use the Elm Brook watershed and the shrublands surrounding Hanscom's west end.

The project to develop the North Airfield parcel for airplane storage (already begun with the erection in 2022 of 4 large storage hangars along an existing access road) will enable greatly expanded use of the Hanscom, but as proposed, it meets only the lowest standards of environmental impact. The proposal claims only that this project would not alter existing airport boundaries with the adjacent wetland (formed by Elm Brook), and that no state-listed rare species have been recorded as breeding within the project area. This evaluation is inadequate, as it does not account for species (especially birds and large mammals) that use and traverse the project area and immediate surroundings year-round. Nor does it offer an adequate buffer zone against fuel leakage or PFAS chemicals leaching into the environment from hanger space that will now be immediately adjacent to the wetland.

One underlying assumption to this proposal is that the project area is already degraded by the remnants of former use, by environmental noise, and by periodic clearing of trees and use of defoliant on the shrublands, and that construction is simply repurposing. Further construction will only degrade the surrounding habitat further, enable more traffic and noise, and endanger species that already have a tenuous foothold in this restricted habitat. Crucially, this construction will move the impacts of the airfield into the zone immediately adjacent to both the wetlands and shrublands on the west end of Hanscom, which are breeding and over-wintering habitat for many important bird species.

The west end of Hanscom field has been especially well studied by birders like me for decades because Hanscom is one of few breeding sites in the state for Upland Sandpiper (which breed within a few hundred feet of the project site and are rare and sensitive species). This area is a locally rare habitat, acting as a breeding area for grassland and shrubland species. Furthermore, because of its location in the Bedford Flats near the Concord River, is a migrant trap in Spring. It has attracted some unusual vagrants, and it is an active over-wintering site for many rare species. Additionally, large mammals such as bobcat and coyote use and den in this immediate area.

The following lists are based on decades of observations and attested by public records in the citizen science database, eBird (Cornell Lab of Ornithology) and decades of personal observations by many local and visiting birders. The following species breed in or adjacent to the project area, or use it during migration or for over-wintering habitat.

### **Notable breeding Species in or adjacent to the project area (\*rare and/or sensitive)**

- \*Ruffed Grouse (now very rare, nearly extirpated from Hanscom area)
- Virginia Rail
- \*Sora Rail
- \*Upland Sandpiper (endangered)
- Killdeer
- Spotted Sandpiper
- \*American Kestrel
- Eastern Bluebird
- Brown Thrasher
- \*Prairie Warbler
- Blue-winged Warbler
- Field Sparrow
- \*Clay-colored Sparrow (one confirmed nesting)
- \*Grasshopper Sparrow (endangered former and potential nester)
- Bobolink
- \*Eastern Meadowlark

### **Species using the project area or surrounding area during migration or over-wintering**

- Green-winged and Blue-winged Teal
- American Black Duck
- Lesser and Greater Yellowlegs
- Northern Harrier (regular winter resident)
- Snowy Owl (irruptive, irregular)
- Short-eared Owl (irregular, always using west end shrubland)
- \*Barn Owl (first Concord record in decades, found in project area Feb. 2015)
- Rough-legged Hawk (most Concord sightings are at Elm Brook)
- Northern Shrike
- American Pipit
- Lapland Longspur
- Horned Lark (regular winter resident)
- Snow Buntings (regular winter resident)

### **Important Mammals**

- Bobcat (individuals and family groups observed at Virginia Rd and Pine Hill)
- Coyote (confirmed breeder in MassPort trail area)

While the project area appears to have a small footprint which uses habitat that is already degraded by former use, these are not good rationales, nor do they anticipate inevitable impacts on wildlife and surrounding habitat. No construction project can fully contain its impact within its boundaries, particularly one immediately adjacent to wetland and rare shrubland habitats. Nor can this project assure the surrounding community that increased traffic and noise will be justified and tolerable.

We strongly urge the alternative MassPort construction (Preferred alternative 2.1.3) that would make wise use of the decrepit Navy hanger and existing non-permeable spaces and avoid construction directly next to the wetland. The dirty secret of the entire Hanscom area, especially the old Navy hanger, is the

likely concentration of PFAS (“forever”) chemicals on the site and all surrounding areas. Such a renovation will likely require extensive mitigation, and I am sure the desire is to avoid those costs and the let the structure get listed. But a renovation would responsibly tackle these issues and render this unsightly relic of the Cold War into functional space. This solution is preferable than letting a private concern develop it separably from MassPort.

We are happy to address specific questions about about the project and about its potential impact on sensitive species, and we are happy to supply historical bird records for the Hanscom area. Don’t hesitate to contact me.

Sincerely,

Kathy Dia  
Cris van Dyke  
John Edmundson  
Janet Kovner  
Nancy Shepherd  
David W. Swain, PhD

David W. Swain  
Concord Birds Project (compiler)  
239 Central St.  
Concord, MA 01742  
(603) 661-2023

**From:** [David Williams](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Comment about Hanscom North Airfield\_ENF-01172  
**Date:** Tuesday, February 14, 2023 5:53:46 PM

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Dear Mr Strysky,

I am writing to comment about the development proposed to the Hanscom North Airfield.

Why will they not share the Zoom meeting recorded on February 3rd after agreeing to do so? Will you do so in the future?

Will you address this evasiveness.

Are you willing to work in good faith with the community?

Will you agree to extend the comment period? If not, why not? I know the regulatory rule/timing, but what do you gain by rushing and alienating abutters?

Will you come and do a formal presentation to the town?

Who is funding this venture (specific people, not corporate names?)

Thank you,

David Williams  
17 School Ave  
Bedford, MA

--

=====  
David Williams  
[williams@pobox.com](mailto:williams@pobox.com)

**From:** [Dimitrios Stefanis](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Formal objection to EEA #16654: L. G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 8:43:54 AM

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Mr. Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Public Comment re: EEA #16654: L. G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

I am a Lincoln resident living within a mile of the Hanscom facility and within the Hanscom flight path. This communication is in response to the above Environmental Notification Form (ENF) regarding the proposed expansion of the North Airfield area at Hanscom Field in Bedford, MA which borders Concord.

I have been advised by friends and neighbors who have attended the meetings and site visits that the plans are objectionable. As presented, I oppose the Hanscom Field expansion slated to begin construction in January 2024. The adverse impact of the project will be felt by residents throughout the area - families and businesses - but the benefits to any of us is completely not apparent.

My reading and hearing from the Information already provided is that there will be more traffic, flights and emissions which will adversely affect the health and welfare of the residents in the surrounding towns.

The 58% increase of 9 acres of impervious area will have a major negative impact on the environment and subsequently public health.

Please do not allow this project to go forward.

Sincerely,

Dimitrios Stefanis  
3 Acorn Lane  
Lincoln, MA 01773  
[dstefanis@verizon.net](mailto:dstefanis@verizon.net)

**From:** [Douglas Elder](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Douglas Elder](#)  
**Subject:** Re: L.G. Hanscom Field North Airfield Development  
**Date:** Tuesday, February 14, 2023 4:40:42 PM

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Alexander,

I am writing to voice my opposition to the expansion of Hanscom airfield. We live at 38 Brooks Rd, Lincoln, the noise from the airfield has grown to be a problem for those of us living in Lincoln. There are days where we cannot even sit outside on our patio or porch as the noise is so bothersome. Also, there are days when I am working via video calls and the other video participants are bothered by the passing aircraft noise. This has gotten to the point where I have to leave my home some days to work from somewhere else.

Secondly, my wife and I are very concerned about the residue which seems to be from the aircraft exhaust which is present on the items outside of our home. It is very noticeable on our bluestone walkway, patio and lawn furniture. If you are to move something which had been on the patio for any extended period of time, there is an outline left from where the item had been laying. This concerns us immensely as we are not sure what the health and environment affects this may have on our property.

It would be prudent to have a study done on what is contained in the exhaust that is produced by an aircraft taking off and or landing which falls to the ground in the surrounding communities. This is very concerning to us as we have seen this coating on the surfaces around our property.

In summary, we are very much opposed to the Hansom expansion and see no intrinsic value to the neighboring communities for this to be approved.

Doug Elder  
38 Brooks Road  
Lincoln, MA. 01773

**From:** [Drew Chrostek](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: LG Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 4:57:15 PM

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As a Concord resident (44 Bedford Street, Concord, MA) I would like to express my concern and disappointment in the possible expansion at Hansom Airfield.

Aircraft activity is already ever-present and is exposing our community to unhealthy levels of both environmental & noise-related pollution.

Concord and the surrounding communities have done an incredible job of preserving the land along with cultural/historical heritage that makes this area so special and unique.

Yet enjoying these public spaces is becoming increasingly difficult (particularly on nice weather days) due to heavy air traffic. Creating additional private aircraft infrastructure will only accelerate/exacerbate this issue. The community has the right to be included in these discussions and should have our voices heard.

A few items that I would like discussed / addressed

- Cap number of private flights in/out of Hansom each day
- Increase (**SIGNIFICANTLY**) the fee for night / early morning operations!
- \$72/\$518 is **NOT** enough considering the disruption it causes our community and those that live under/near the flight path
- Develop a transition plan to [electrification](#).
- For immediate review: Setting a target date for all flight school / small personal planes to go electric / hybrid.. [Technology](#) is there and other communities are already benefiting
- Why can't we be the first airport to be all electric or majority electric/hybrid?
- When was the last environmental impact study completed?
  
- Develop a new set of standards for noise
- When was the last noise pollution study completed?

Thanks,  
Drew

41 Laurel Drive, Lincoln, MA 01773

Feb 14, 2023

[Via email to Alexander.Stryisky@mass.gov](mailto:Alexander.Stryisky@mass.gov)

Alexander Stryisky  
Massachusetts Environmental Policy Office  
100 Cambridge Street, Suite 900  
Boston, MA 0211

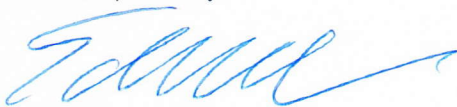
**Subject: EEA #16654: L.G. Hanscom Field North Airfield Development ENF**

Dear Mr. Stryisky:

As voters and taxpayers in the Commonwealth of Massachusetts, **we write to oppose the Subject Development at Hanscom Field to accommodate additional private aviation.** We find incredulous any claim of reducing Hanscom flight operation carbon emissions by basing substantially more private aircraft at Hanscom. As citizens of the Commonwealth and in harmony with recent Massachusetts legislation, we have upgraded our electrical and space and water heating systems to make them reliant on electricity, we buy 100% of our electricity backed by Massachusetts Class I Renewable Electricity Certificates, and have added an electric circuit to accommodate Level 2 electrical vehicle charging. We do not want Massport and private developers colluding to drag the Commonwealth in the opposite direction, undercutting investments of citizens who take climate issues seriously and are assuming responsibility for their carbon emissions. We oppose Massport enabling increased private jet travel by an elite minority who can afford this ultra-high-emissions luxury that is significantly more carbon emitting per passenger-mile than commercial air travel. We note Massport's assertion on its website that non-stop travel to all parts of the world from Logan Airport is available. Not only does private air travel pollute on a state and global level, but the infrastructure to accommodate it, in particular a fuel farm with attendant potential to pollute our groundwater, will potentially have significant negative environmental impacts. Please do not enable this minuscule minority to increase use of this most polluting method of travel. Doing so is contrary to the spirit and letter of two recent Acts of the Legislature (below) and would be a hypocritical betrayal of the majority of Massachusetts citizens who are responding seriously to climate threats.

- AN ACT CREATING A NEXT-GENERATION ROADMAP FOR MASSACHUSETTS CLIMATE POLICY. (2021)
- AN ACT DRIVING CLEAN ENERGY AND OFFSHORE WIND (2022)

Respectfully,



Edward C Kern, Jr.



Priscilla D Kern



**From:** [Edward Young](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom proposal  
**Date:** Tuesday, February 14, 2023 12:11:07 PM

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This proposal overreaches in many ways and, if not resubmitted in a drastically altered form, ought to be simply rejected.

**From:** [ecoules1@verizon.net](mailto:ecoules1@verizon.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Kati Winchell](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF Include your name and full address to have your Comment be accepted.  
**Date:** Tuesday, February 14, 2023 9:32:02 PM

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Hi Alexander,

My name is Elizabeth Coules. I live at 82 Virginia Rd. Unit 108 Lincoln, MA 01773 for answers to my questions/comments. Please add my questions/comments to this ENF for the record. thank you.

Questions:

1. How much money does Massport in total each year spend to lobby the MA State house and which people do they give money to in the State House and what amount? Who are the people at Massport in charge of lobbying the State legislature and how many people are paid by Massport to lobby the MA State House.
2. Massport is not registered with MA Secretary of State Lobbyist office. Why? Massport does not pay state property taxes and as such is answerable to the state for a part of its funding.
3. For the past 10 years a bill to rescind the exemption of luxury tax for airplane cabin upgrades is always filed with the state and is never brought up on the State House for a vote. Why? Massachusetts is the one of the few if not the only state that exempts this airplane luxury tax. Why?
4. The 1200 or more jobs that Massport claims it provides the state: what kinds are there and what are the average salaries? Do the majority of these jobs provide good health benefits and matching 401Ks and require a college degree without exposure to harmful chemicals and materials?
5. Massport does not pay state property taxes and as such is answerable to the state for a part of its funding. Why doesn't Massport pay for a cleanup fund for the noise, air and toxic waste pollution it causes each and every day. In addition, why doesn't Massport provide education classes to everyday citizens on the dangers that air travel imposes on the environment? Why doesn't Massport have funds for these things?
6. Right now how many customers are on the waiting list for hangar space at each of the three Hanscom FBOs.
7. Right now, how many ferry flights are going on?

8. Right now what is a good faith estimate of how many more corporate jets will be housed in these new hangars.

9. The formula for calculating plane noise currently averages the noise decibels in one day, instead of recording separate noise decibels for each plane. Averaged noise does not provide a true view of how much noise each plane makes and also lowers that actual noise that occurs. Why isn't Massport recording the actual noise of each plane. I have heard the answer before that the method used by Massport is correct. However, I don't believe it. I would appreciate an honest answer with facts to back it up.

10. Why did Massport go ahead and buy up land (partly with state taxpayer money) at Hanscom without getting the permission of the state **first** and input from surrounding communities?

11. Bob Domnitz, chair of the Lincoln Planning Board pointed out that the airport's 1978 master plan states that acquisition of additional land "would be considered only in instances when it essential to preclude major incompatible development." The land swap, he said, violates that commitment. "Can Massport just ignore its own master plan whenever it chooses to do so?" My question: Is that true?

12. Planning Board Chair Steve Hagan asked about increasing demand on electricity and the possible need for a substation. The growth in electric airplanes "is going to provide quite a power draw. Do you need a substation in the future? We want to know estimates on power draw as you open and in the future." My question: What are the future good faith estimates for the cost of electricity for Hanscom planes and who would pay for it?

13. Is Massport going to pay for increased use of water and sewer or make Bedford pay for it with the North Airport development?

14. Former Lexington Planning Board Richard Canale challenged the project schedule. "You say you are going to submit a draft report in June, which leaves the summer months for public input. If you're serious about getting public input on something this complex, you need to adjust that schedule." My question: How and when are you going to adjust that schedule?

15. Kinton acknowledged that Massport "wants to make sure taxiways and taxi lanes" can support the so-called Group 4 heavier planes. My comment/questions: Hanscom Runway 5 was recently upgraded with a lot of noise and disruption over summer months to the surrounding towns. How many months will it take to upgrade taxiways and taxi lanes to support Group 4 jets

which will cause the same type of disruption over many months to surrounding towns? Is it physically possible without exceeding public safety and environmental concerns to upgrade these taxiways and taxilanes in the first place?

16. Right now there is a corroded fuel pump on the north side of the airport near the old hangar building. How much fuel, a good faith estimate will be required to support 27 hangars. Will Massport promise always to never build a fuel substation on the North Airfield?

17. Right now for the past year how many corporate jets without passengers land every day at Hanscom?

18. Will unleaded fuel be sold instead of leaded at North Airfield?

19. Soil testing for lead be added to the Environmental Requirement per FAA requirement?

20. Are there independent traffic studies already done that show how much increased traffic by cars to Hartwell Rd to Bedford North Airfield.

**From:** [Ellen O'Donnell](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** opposition to expansion of Hanscom Airfield  
**Date:** Tuesday, February 14, 2023 12:22:28 PM

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Dear Mr. Strysky-

I will be brief in adding my voice to the opposition to the proposed expansion of Hanscom Airfield. I am very concerned about the impact expansion would have on our local and global environment, home values and increased air traffic and noise pollution. It seems to me that neither the Hanscom military community nor the local community stands to gain any benefit from this proposal. The main beneficiaries will be corporate and private air travel consumers at a time when this very practice needs to be discouraged for the public good.

Sincerely,

Ellen O'Donnell, PhD  
298 Holden Wood Rd, Concord, MA 01742  
401-481-3376

--

please excuse typos!

**From:** [equackenbush206@gmail.com](mailto:equackenbush206@gmail.com)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Public comment re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 4:35:08 PM

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RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

The proposed North Airfield Development ENF provides benefits to a very few users, while the costs will be borne by the public in all the surrounding town.

It is the responsibility of the proponents to provide complete and accurate information as part of the DEIR (Draft Environmental Impact Report) and FEIR (Final Environmental Impact Report) process, which will help inform those making decisions at different points in time.

Some topics that need accurate facts and a complete assessment of the economic and environmental impact of the project include:

The federally owned Great Meadows Wildlife Refuge, the Minute Man National Historical Park and the Battle Road Scenic Byway are on a direct path with the east-west runway, as well as many cultural resources and open spaces that bring visitors to this region. As Hanscom Airfield has grown and expanded over the years, the incremental increases in vehicular traffic, aircraft traffic, noise, air pollution and so forth, has eroded the quality of life for residents and wildlife and diminishes the visitor experience. The cumulative impact of these incremental increases adversely effects the natural, cultural, and historical resources of the communities.

#### Ferry Flights

During the presentation, the proponents stated that the new hangers would reduce the number of "ferry flights." This statement must be supported with accurate information on the number of such ferry flights today per day/week/month and the projected number of flights as the hanger and runway expansion will attract additional users. The numbers used in any economic analysis used by the proponents to gain funding for this project must be made public.

#### Economic Costs to Historic Assets along the Flight Path

Hanscom Airfield is within the four communities of Bedford, Concord, Lincoln, and Lexington. These four communities exhibit intrinsic qualities of scenic, historic, recreational, cultural, archaeological, and natural features that are recognized for their national significance and considered representative, unique, irreplaceable, or distinctly characteristic of this area. Greatly valued by residents, these intrinsic qualities draw visitors from around the world seeking connections and inspiration from the American story.

The Towns of Concord and Lexington derive significant revenue from tourist revenue and a reduction in the experience, in terms of noise, the distraction of overhead aircraft, vehicular traffic, and air pollution. The proposed project will have a detrimental impact on the tourist experience and tourist revenue.

This revenue is especially important as Concord/Lexington's 250<sup>th</sup> celebration in 2025 approaches.

The proponents should utilize the towns' 250<sup>th</sup> celebration visitor count and revenue projection should be used and included in the economic impact.

#### Environmental Impact

The east-west runway directly impacts Great Meadows Wildlife, home to many endangered species, whose environment will be degraded by the increased noise, air pollution and visual impact of the increased air traffic from the proposed project.

Great Meadows is also used and enjoyed by many naturalists, bird enthusiasts, and photographers. Their experience will also be impacted by the increased air traffic from the proposed project.

I strongly oppose this project that will benefit very few users and impact the public in all surrounding towns and the visitors from around the world that visit the area's historic an open space resources.

Signed,

Ellen Quackenbush  
206 Prairie St  
Concord, MA 01742

**From:** [FERNANDO COLON-OSORIO](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom private Jet Expansion  
**Date:** Tuesday, February 14, 2023 10:17:35 AM

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Dear Mr. Stryski:

We are residents of Concord, Massachusetts at 6 Thornton Avenue. The proposed Massport expansion of Hanscom off Hartwell Road, will create a major environmental impact in terms of:

1. use of scarce resources - water
2. increased usage of water waste disposal resources;
3. potential environmental impact from gasoline spills associated with the proposed fuel farm; and certainly but not of less impact

**INCREASE NOISE POLLUTION in the SURROUNDING COMMUNITIES.**

The question to be asked is what is the public benefit of such a facility? Certainly is not a benefit to 99.999% of the population who are currently struggling to keep up with inflation.

The benefit is simply restricted to the 0.00000000000000000000000000000001 % of Americans that have or can afford private jet travel, and Corporate entities.

Why are we doing this? It makes absolutely no sense. My wife and myself are vehemently opposed to such a project.

Respectfully,

Dr. Fernando Colon Osorio and Laurie Margolies,  
6 Thornton Lane, Concord, MA 01742



**From:** [Gail E. Hire](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [kati@saveourheritage.com](mailto:kati@saveourheritage.com)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 2:15:56 PM

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Hello,

I am writing to voice my opposition to the proposed plan to expand corporate hangar space at Hanscom Airport in Bedford. I live in Concord, and my family regularly hears the noise from planes taking off at Hanscom. The noise is so bad that if you are having a conversation outside, you cannot hear the other person, and have to wait for the plane to fly over before continuing. Anything that can be done to decrease the number of flights from the airport would be appreciated by the neighbors to this airport.

The ENF says that the site is at “high risk for extreme heat and urban flooding.” One of the best ways to cool the environment and manage stormwater is to preserve and protect mature trees and forests. Trees also provide a buffer from airport operations and noise to animals and humans. Trees also remove carbon from the air, which can counteract the high levels of emissions from air travel. I would like to see this project make every effort to avoid clearing mature trees and forest. In fact, more trees should be planted as mitigation for the project's impacts. Any trees or vegetation removed during development should be replaced elsewhere on site with new trees by a 2 to 1 ratio.

Thank you for your close attention to this project. I will also be sharing my comments with the Governor's office.

Gail Hire  
54 Nancy Road, Concord, Mass.

**From:** [Garret Whitney](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [Garret Whitney](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:51:03 PM

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Dear Mr Strycky,

I'm writing in strong opposition to the planned expansion of Hanscom Field's private jet operations. Having studied the situation I see no legitimate justification for expanding Hanscom or it's activities.

At this time when the entire world - natural and human - is at imminent risk from fossil fuel emissions and habitat destruction, this plan shows a disregard for the health and wellbeing not only of the residents of the surrounding towns, but indeed of every person on Earth.

Air travel is among the most egregiously polluting of modern activities; private corporate and luxury travel is many times worse. Despite the absurd claims that expanding hanger capacity by up to three times and making taxiways suitable for much larger aircraft will somehow cut the number of flights - with the implication that this would reduce greenhouse gas emissions - the proposal will further burden the surrounding towns, the region, and the world.

Please reject this flagrantly bad plan!

Garret Whitney  
296 Health's Bridge Rd  
Concord, MA 01742

**From:** [Hope O'Brien Jones](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 9:31:46 AM

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Good Morning,

I am writing to oppose the expansion at Hanscom. The adverse affects including pollution, noise pollution, and decreased property values would be felt most strongly by our community which has been unjustly left out of this seemingly fast-moving process. I strongly urge you to consider a reevaluation of this proposition, and to involve this community of passionate, kind, and intelligent people who would be more than happy to volunteer their time in partnering to achieve solutions that are more agreeable to all parties involved.

Respectfully,  
Hope O'Brien Jones  
--  
-Hope O'Brien Jones

**From:** [Verizon™ AOL Activity](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** hanscom  
**Date:** Tuesday, February 14, 2023 12:48:39 PM

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To Whom It May Concern,

As a Bedford resident on Kendall Court which abuts some of the property of HAB, I strongly object to the plans presented for their expansion. Aside from property values, consideration must be given to the environment...Elm Brook and the wildlife around it, the biking/hiking trails, the increased traffic on Hartwell Road, the increased potential for accidents. I object to the short amount of time made available to citizens to react and respond to these plans. The behavior, thus far, has certainly not been one of a "good neighbor" but rather that of an arrogant aggressor feeling strongly that anything can be done without regard to Bedford citizens.

Iris Brough  
59 Kendall Court  
Bedford, MA

**From:** [Ismail Nabih](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Formal objection to EEA #16654: L. G. Hanscom Field North Airfield Development E  
**Date:** Tuesday, February 14, 2023 11:28:27 AM

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Mr. Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Public Comment re: EEA #16654: L. G. Hanscom Field North Airfield Development  
ENF

Dear Mr. Strysky,

I have been a resident of Lincoln since 1974, I purchased my home on Tower Road in 1976 and have lived in there since then, my eldest daughter and family also live in Lincoln on Bedford road, my three daughters, and two of my grandchildren attended the Lincoln schools. We have - and still do - thoroughly enjoyed living in Lincoln, and certainly do not want to see our quality of life seriously degraded.

This communication is in response to the above Environmental Notification Form (ENF) regarding the proposed expansion of the North Airfield area at Hanscom Field in Bedford, MA which borders Concord.

I am passing on a message my Daughter e-mailed you today, I second her and have nothing more to add.

Kind Regards

Ismail Nabih  
95 Tower Road  
Lincoln MA  
e-mail [Ismail.Nabih@gmail.com](mailto:Ismail.Nabih@gmail.com)  
978 423 9153

I quote :

***I have been advised by friends and neighbors who have attended the meetings and site visits that the plans are objectionable. As presented, I oppose the Hanscom Field expansion slated to begin construction in January 2024. The adverse impact of the project will be felt by residents throughout the area - families and businesses - but the benefits to any of us is completely not apparent.***

***I am concerned about increased traffic of aircraft operations and associated vehicles.***

***I am concerned about carbon emissions, noise, air, water and soil pollution.***

***I am concerned about the impact on wildlife and environment.***

**Questions:**

***What is the plan to curb dangerous emissions and noise resulting from the increased traffic and flights?***

***What is the amount of carbon emissions from airport operations now and what will be the emissions in when the project is completed?***

***What are the projected traffic implications on the roads leading to and surrounding Hanscom field and what is planned to limit congestion and emissions from the increase?***

***What is the benefit to surrounding families and businesses for this project to go forward?***

***What alternatives have been considered by the developer to expand operations elsewhere?***

**Comments:**

***My reading and hearing from the Information already provided is that there will be more traffic, flights and emissions which will adversely affect the health and welfare of the residents in the surrounding towns.***

***The 58% increase of 9 acres of impervious area will have a major negative impact on the environment and subsequently public health.***

***Please do not allow this project to go forward.***

***Sincerely,***

***Shah Carson  
143 Bedford Rd  
Lincoln, MA 01773***

**From:** [Joseph Stein](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 4:03:23 PM

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Dear Mr. Strysky,

I strongly oppose the proposed expansion of the Hanscom Airfield, and request that this project be reconsidered. The increased noise pollution, car traffic, and impact to abutting historical landmarks will cause negative impacts to our town that will be irreversible.

The proposed scope of the project is also excessive. I worked in real estate development for many years, and have a good sense for how the game is played. Developers want X%, and they present public plans for twice that amount. The community complains, and the developer gets the original X% they wanted all along.

In this case, the proposal for any level of expansion raises significant concerns. These include clear environmental justice issues, as well as encroachment on historically sensitive areas that abut Hanscom, including Thoreau's birthplace, the National Minuteman Park, and others. The increased level of high decibel aircraft noise that will result and increased traffic on 2A are also very significant concerns.

We are also in an environmental crisis, and need to reconsider any expansion of air travel. Air travel is without question the most unsustainable form of travel in terms of absolute greenhouse emissions. Maintaining the existing level of air services is sufficient. Opening services to the masses will destroy our small town of Concord forever.

J. Francis Stein, Esq.  
223 Laws Brook Road, #304  
Concord, MA

**From:** [JAMES WILLIAMS](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:46:55 PM

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Dear Mr. Strycky,

As a local resident, I am very concerned about the proposed expansion at Hanscom, particularly the long-range impact on all the neighboring towns. I do not see any compelling reason for this project to move forward, and so I must register my opposition to it.

Thank you for providing this opportunity to comment on this project.

Sincerely,  
James F. Williams  
278 Prairie St.  
Concord, MA 01742



**From:** [jhlocke@aol.com](mailto:jhlocke@aol.com)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom  
**Date:** Tuesday, February 14, 2023 7:43:45 AM

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Dear Mr. Stryker,

Please do not support the expansion of Hanscom that is currently being discussed. My husband and I are noticing increased air traffic noise in the past few weeks, and would like to not have it increased further.

Sincerely,

Janice Locke

95 Spring Road  
Concord MA

February 14, 2023

Alexander Strysky

MEPA Office  
100 Cambridge., Suite 900  
Boston, MA 02114  
[Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)  
(857) 408-6957

Dear Mr. Strysky,

Thank you for the opportunity for the public to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development". As a longtime resident of Lexington, I am very displeased by this process and find the proponents lack of answers to public questions posed at the February 6, 2023, meeting unacceptable.

The MEPA review process is a valuable opportunity for the public to provide input ask questions and receive more than statements as "I don't have that information with me", "I will get back to you", "We have not got to that level of details as yet". I found the proponent very evasive and uninterested in providing what information was meaningful to the process and the public.

This a major project with major impact to not only the four Town's surrounding the area, but also to those from all over the world and country who come to the Minuteman Historical Park to visit this historic area. The idea of private jets storage, parking, and facilities to facilitate the private entities is beyond reason, particularly when it will cause many environmental impacts in the area and beyond.

Thank you,

Jeanne P. Canale  
29 Shade St.  
Lexington, MA  
02421  
781-572-8990

**From:** [Jenn Lachey](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 5:30:22 PM

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To whom it may concern:

I am writing today to express concern regarding the potential environmental impacts and overall carbon emission increases that may occur if the plans contained in the Hanscom Field North Airfield Development ENF proceed. I believe that this expansion is in direct opposition to the ambitious climate goals we have set as a state, and that we are trying

to meet on the local level.

I do not see a clear need for the expansion, but I see clearly the disruption and pollution it will bring to our communities.

Thank you for your consideration,

Jenn Lachey

99 Tower Road Lincoln

February 14, 2023

Dear Mr. Strysky,

Please accept my public comments for the MEPA review of EEA #16654: L.G. Hanscom Field North Airfield Development ENF.

**Comment 1: Segmentation <https://www.mass.gov/regulations/301-CMR-1100-mepa-regulations>**

*The Proponent may not phase or segment a Project to evade, defer or curtail MEPA review. The Proponent, any Participating Agency, and the Secretary shall consider all circumstances as to whether various work or activities constitute one Project including, but not limited to, whether the work or activities, taken together, comprise a common plan or independent undertakings, regardless of whether there is more than one Proponent; any time interval between the work or activities; and whether the environmental impacts caused by the work or activities are separable or cumulative.*

Could the various moving parts in the development of the North Airfield fit MEPA's definition of segmentation? I suggest that the way this multi-faceted project has morphed, grown, been renamed, been subdivided and then ultimately reassembled into one massive development during the past several years has effectively veiled its nature, size, and potential environmental and health impacts on surrounding communities.

**Comment 2: Old Air Force burn pits**

Is there an important Superfund site PFAS contamination source area (two old Air Force burn pits) on or near the land parcel east of the Navy Hangar that Massport has offered to trade to the developers? Is this PFAS source area linked to the PFAS-contaminated groundwater beneath the North Airfield, as well as some contaminated surface waters near the airfield? Has the Hanscom Air Force Base Superfund remedial team been kept informed and included as part of the environmental planning and review process for this project?

**Comment 3: Project proximity to homes, children, and recreational playing fields**

There seems to be no acknowledgment in the environmental filing that a Bedford residential neighborhood (to the northwest of and adjacent to Werfen) is located only a thousand feet from the proposed private/corporate jet hangar complex. The neighborhood may be even closer to a separate new combined box/T-hangar complex that has been under construction during 2022. The box/T-hangar project is directly adjacent to the proposed private/corporate jet hangar complex being reviewed here, but is not shown in any figures in this environmental filing. (The location of the partially-completed box/T-hangar project can be seen here <https://www.thebedfordcitizen.org/2022/06/according-to-massport-new-north-airfield-development-will-not-include-fueling/> )

This Kendall Court neighborhood has about 80 homeowners – many with young children. Neither it, nor The Edge Sports Center's popular recreational playing fields (which will also be about a thousand feet from the proposed private/corporate jet complex) are clearly labeled in any of the ENF figures. In fact, this neighborhood isn't even shown in two of the most important and detailed figures in the ENF: Figure 1.2 (Land Transfer Plan) and Figure 1.5 (Proposed Conditions Site Plan).

I'm concerned that developers, contractors, and State and Federal reviewing agencies could easily overlook the number of families – and in particular youth and young children – that will live and play in close proximity to these two separate, but adjacent hangar projects.

**Comment 4: Massport and FAA pre-approval of the proposed new airfield service road?**

The developers propose to build a new service road within the airfield to connect this hangar complex with the other side of the airfield, in order to keep construction traffic and aviation fuel tankers off Bedford residential roads. However, during the 2017 runway repaving project, thousands of heavy

construction vehicles hauling pulverized old runway asphalt as well as hot tar and gravel actually did travel through Bedford and Billerica residential neighborhoods 24/7 for more than six weeks. Massport officials' justification back then was that it was impossible to use a service road to route construction traffic through the airfield to the Civil Air Terminal main entry/exit road, because it was too hazardous for construction traffic to cross the runway ends. What is different now?

Has the proposed new on-airfield service road connecting the North Airfield with the south side of the airfield actually been pre-approved by Massport and the FAA? If not, then environmental reviewers, local town officials, and residents could seriously underestimate the negative impacts on airfield neighborhoods of heavy project construction traffic traveling through residential roads – for years. Not to mention the hazard of having jet fuel and leaded gasoline routinely trucked through Bedford, Concord, and Lincoln roads and residential neighborhoods for the foreseeable future.

**Comment 5: Lack of clarity on a proposed future “living history” museum**

I am concerned about the ENF's vague description of a potential “living history” museum. I suggest that if the developers' intent is to house working vintage aircraft in or near the Navy Hangar in the future, there are important safety risk and environmental considerations that should be openly disclosed now.

The tragic deaths of nine passengers and pilots in three plane crashes during New York-based and Massachusetts-based vintage aircraft flights and vintage aircraft aerobatic performances over the past four years is troubling. I believe it would be dangerous and inappropriate to base either of those types of operations in a “living history” museum on the North Airfield - or anywhere else at Hanscom Field - because of their inherent risk and the population density of the surrounding communities.

It would also be irresponsible to build a leaded avgas fueling/storage facility here in the North Airfield to service and maintain these old aircraft which likely will never be able to transition to lead-free avgas. That would guarantee that even after more modern prop planes eventually successfully transition to using lead-free avgas, the North Airfield would be locked into keeping an unwelcome leaded avgas fueling facility. To service vintage aircraft that probably should have been permanently retired from flight decades ago.

I also suggest that the proximity of homes, recreational playing fields, and children to the proposed hangar complex makes the storage and use of leaded avgas fuel on the North Airfield a No Go - both for modern prop planes, and especially for any working vintage aircraft.

If the developers and Massport are serious about reducing harmful aviation fuel emissions, this is one way to prove it: **Don't build leaded avgas fuel servicing and storage facilities on the North Airfield.**

Thank you for considering my comments.

Sincerely,  
Jennifer Boles  
Bedford resident

**From:** [IRYNA V](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Cc:** [IRYNA V](#)  
**Subject:** EEA#16654 L.G Hanscom North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 11:17:50 PM

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Hello Alexander,

We are the residents of Bedford and live not far from Hartwell Road. We are very concerned about this project! We believe that this project is not good for our small town and surrounding towns as well.

We know that it will impact our health and the health of our children due to noise, air, soil and water pollution, it will affect our safety and the safety of our children! It will affect wildlife, climate change, many mature trees will be removed, and it will increase road traffic in our rural town with the small roads.

We really hope that our voices will be heard and this project will be stopped.

Sincerely,  
Jim and Iryna McDonald and other Bedford residents.

**From:** [JOAN GEOGHEGAN](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Airport Expansion  
**Date:** Tuesday, February 14, 2023 7:37:13 AM

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Dear Mr. Strysky,

I am writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. As a resident of the surrounding community, I am deeply concerned about the environmental impact of increased air traffic and the harm it will cause to our daily lives.

Increased air traffic from the expanded airport will result in higher emissions of harmful pollutants, including greenhouse gases, nitrogen oxides, particulate matter, and lead from aircraft fuel. These emissions will contribute to air pollution and further harm the environment. The expansion will also lead to increased aircraft noise at all hours of the day and night.

Given these negative externalities, it is only fair that the surrounding community be compensated for the harm caused by the airport expansion. This compensation could include, but is not limited to, funding for soundproofing of homes, financial compensation for decreased property values, and programs to mitigate the effects of increased pollution on public health.

I request that you reconsider this proposal and take into account the negative impact it will have on the community and the environment. Instead of expanding the airport, I strongly urge you to focus on finding alternative solutions that address the growing demand for travel while minimizing the impact on the environment. Investing in more sustainable forms of transportation, such as trains and electric vehicles, is a better way to reduce the environmental impact of air travel and protect our planet for future generations.

I strongly urge you to prioritize the well-being of the community and the environment before moving forward with this proposal. There will be a limited number of people who will benefit from this, however a larger number will be harmed. Residents should be fairly compensated for harms caused by the expansion.

Sincerely,  
Joan Geoghegan  
275 Holden Wood Road  
Concord, MA 01742  
[joangeo@comcast.net](mailto:joangeo@comcast.net)

**From:** [Joan Wolcott](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Craig Elliott](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 11:57:03 PM

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Hello Mr, Strysky,

My name is Joan Wolcott Elliott and my husband and I live at Battle Road Farm, 36A Indian Camp Lane, Lincoln, MA 01773, a condominium community adjacent to Hanscom Airfield. We attended the online meeting on 2/6/2023 and are very concerned about this proposed expansion project. There are many consequences for this project which would severely impact both the local residents (including our cherished neighborhood and community at Battle Road Farm) and the historic and natural resources in the local area, and even more importantly, the planet that you and I live on. There are so many negative impacts this project would have--air pollution, noise pollution, impact on human health and mental well-being, drainage and water issues, displacement of trees and plants, reduction of animal habitat, and more. The so-called benefits would certainly not offset the negative impacts. This would be an unfair and unconscionable development which would be detrimental to MANY MANY people and to our environment, with negative effects lasting for years and years. Why? To allow more private jets? Is that truly necessary? Is this simply an unethical and immoral response to market demand? We must consider the BIG picture, and not simply let market forces determine what we do in our communities and on our planet. PLEASE reconsider this whole project. Let's do something truly beneficial with our energy, time, and resources.

This was my comment on the zoom chat:

Yes, thank you, Senator Barrett for your comments and for providing the larger picture of impact of this development on our climate. I am also very concerned about inviting more inefficient, highly polluting private jets into our community. But this is not just about our community—this is about OUR planet. Are we to simply keep supplying land for unlimited private consumer demands? When is too much?? These are moral, ethical and environmental questions. not just economic.

Thank you SO much for considering these comments deeply, and listening to your own conscience on this!

Joan Wolcott Elliott  
36A Indian Camp Lane  
Lincoln, MA 01773  
781-439-3138



**From:** [Jon Andersen-Miller](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:58:39 PM

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I'm writing to encourage the state to oppose expanded development of Hanscom. As a resident of Concord, I am surprised that so much money would be spent to serve so few people, to the detriment of our shared environment for many. Encouraging private jet traffic exacerbates climate change and harms the nature buffer around the existing facility. Air pollution, sound pollution, ground water - for the convenience of a privileged few, is not in the best interests of the Commonwealth.

Thank you - Jon Andersen-Miller, 71 Jennie Dugan Rd, Concord, MA 01742

**From:** [Joseph Selle](#)  
**To:** [Strysky, Alexander \(EEA\)](#); [Erin Sharaf](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 12:00:51 AM

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Dear Mr. Strysky,

I am a resident and property owner residing in Concord, MA. I am strongly opposed to the proposed expansion and modifications at Hanscom (**EEA #16654: L.G. Hanscom Field North Airfield Development ENF**) on environmental grounds. It is highly illogical to pursue a heavy fossil fuel consuming infrastructure project at a time when our society must wean ourselves from fossil fuels or face catastrophic climate change, including failure of predictable rainfall (ie drought), coupled with extreme atmospheric storms. It is important also to note the negative consequences this project will have on wild lands and animals. Tearing down forest lands and replacing them with paved surfaces is not the direction we should be going. Making this project even more offensive is the fact that private and corporate jet travel is purely optional and there are many reasonable alternatives such as commercial jet flight and online business meetings. I have been a part of Corporate America for 25+ years and I can personally attest to the fact that business people are universally flying less and less. So, why are we incurring the negative consequences of an airport expansion into wild lands at this point in time?

Please read on for additional arguments and logic that support my opposition to enlarging Hanscom Field:

The proposal will primarily benefit corporations and private owners of jet aircraft during a time of rapidly increasing climate instability. In November 2022, climate scientists across Europe and the US blocked entrances to airports to protest emissions from the aviation industry and to call for a ban on private jets. At least 16 scientists in the U.S. and a total of 81 worldwide had taken part in this action.

The scientists specifically targeted private jets because they represent the contributions of the ultrarich — and their lifestyles — to global greenhouse gas emissions. Scientist Rebellion said in a news release recently that the private airline sector was “the pinnacle of climate injustice and emissions inequality.”

The effect of aviation on the environment is under scrutiny in the United States [and elsewhere](#). The [sector](#) is already considered among the world’s top carbon emitters. Experts say it accounts for about 3 to 4 percent of total U.S. greenhouse gas emissions.

Private jets are estimated to cause five to 14 times as much pollution as commercial planes per passenger, [according to a study](#) published last year by Transport & Environment, a group campaigning for cleaner transportation.

The science about the climate has been clear for half a century. The situation is desperate. We cannot continue to make decisions as we have in the past, assuming that opportunities for economic growth based on fossil fuels can continue forever. We must be mature enough to start talking about de-growth, and to have the courage and wisdom to make hard decisions on behalf of future generations.

The people with the least wealth and power around the world will suffer the biggest consequences of our continued emissions, not to mention the nonhuman animals who are disappearing at astonishing rates.

There are many environmental concerns specific to this project that need to be addressed.

- 1.** The overall impact of this airport on climate change is certain to be harmful. The reduction in ferry flights does not appear to be a significant mitigation of this impact. No data has been given to HFAC (Hanscom Field Advisory Commission) indicating how many ferry flights will be involved or the overall expected impact on climate change expected from this project. HFAC requests data showing that the overall expected impact of this project will reduce climate change impacts, in alignment with regional goals to achieve net zero carbon emissions by 2050.
- 2.** It is understood that the project includes a "fuel farm" despite being located over an aquifer. HFAC requests information proving that this fuel farm will not endanger the aquifer or local drinking water supplies.
- 3.** There is a process under way to nationally phase out the use of leaded avgas. HFAC seeks assurance that none of the new hangar space will be used for aircraft operating on leaded avgas. HFAC seeks assurance that the new fuel farm will not include facilities to store or dispense leaded avgas (which is available from other FBOs at Hanscom Field).
- 4.** The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase. HFAC requests data showing that this will not produce a net increase in jet aviation traffic in the region, accounting for any possible reduction in ferry flights.
- 5.** The project includes plans to upgrade taxiway and runway capabilities to accommodate larger Group 4 aircraft. HFAC requests data showing that this addresses an established need for the regional transportation system.
- 6.** There is a climate change emergency and every effort must be made to phase out

and not expand use of fossil fuels. HFAC requests an explanation of how this project contributes to the solution of this emergency.

7. Aviation contributes to the climate change emergency. HFAC requests detailed plans for the use of sustainable airplane fuel or alternate fuels such as hydrogen or electric power by all aircraft supported by this project. HFAC expects that this project will demonstrate a monotonic reduction in greenhouse gas emissions to reach a net-zero target by 2030.

8. Hanscom Field adjoins Great Meadows National Wildlife Preserve. HFAC requests that this project be studied to show that protected wildlife in the national preserve will not be harmed.

9. Many significant historical sites are in the immediate vicinity. Aviation using Hanscom Field is supposed to avoid creating disturbance over Hartwell Tavern in the Minuteman National Historical Park. The "shot heard round the world" was fired at nearby Old North Bridge in Concord and the Lexington Battle Green is an important historical site and tourist attraction. HFAC requests information showing how these historical sites will not be harmed, including tourist revenue, educational opportunities and recreational enjoyment of the spaces.

10. The plan involves removal of approximately 34 acres of wooded area. HFAC requests information showing compensatory protection of an equivalent area elsewhere in the region.

The overall impact of the proposed North Airfield/Old Navy Hangar project is likely to cause regional harm and contribute to environmental projects in many ways. This large airport expansion is incompatible with the densely populated region. It is not expected that these harms can be mitigated in any way.

Dr. Elliot of the Hanscom Field Advisory Commission concludes: "Therefore, the HFAC joins with regional town governments and citizen groups to oppose this project."

In addition, the proposal will certainly negatively impact local wildlife and Bald eagles that frequent Great Meadows. There are many pairs of bluebirds (and countless other birds, mammals, amphibians) who call the trees and fields around Hanscom their home.

Who is speaking for them? Who is considering their needs? In an increasingly urbanized world, where will they go to exist on this planet that is theirs too?

In a world where we need to cut our emissions in half by 2030 and to almost zero by 2050 to keep the global temperature rise below 1.5°C, expanding the private aviation industry is a big step in the wrong direction. This project is incompatible

with the stated climate goals of the Commonwealth of Massachusetts and our nation and should not move forward. The towns surrounding Hanscom Field pride ourselves on open space and our commitment to environmental stewardship. This development project directly contradicts the notion of environmental stewardship.

Respectfully submitted,

Joseph Selle  
528 Old Bedford Road  
Concord, MA 01742

**From:** [Joseph Stein](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:53:01 PM

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Dear Mr. Strycky,

I am writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. As a resident of the surrounding community, I am deeply concerned about the impact increased air traffic and noise pollution will have.

We live in a neighborhood called Conantum which is currently within the Hanscom fly zone. As a result, we experience frequent noise pollution related to existing air traffic. Any proposed expansion will increase this level of aircraft noise, causing undue stress to our neighborhood of over 100 households and negatively impact our property values.

Given its wooded nature and proximity to the Sudbury River watershed, Conantum has one of the highest densities of wildlife in Concord. Studies show that noise pollution presents diverse threats to species, particularly those that rely on vocal communication - including birds. In particular, evidence shows altered vocal behaviors, reduced wildlife abundance in noisy areas, and changes in foraging behavior. Given the continued decline in species loss in Massachusetts and globally, we cannot afford any future loss within our town.

The proposed expansion also unnecessarily encroaches on nationally important historical areas, including the birthplace of Thoreau and raises serious local environmental justice issues.

Increased air traffic will also result in higher emissions, including greenhouse gases, nitrogen oxides, particulate matter, and lead from aircraft fuel. These emissions will contribute to air pollution and further harm the local environment.

Given this, we urge you to reconsider the scope of proposed expansion. If expansion plans continue, we demand that the surrounding communities be compensated for any harm caused. This could include funding for soundproofing homes, compensation for decreased property values, and programs to mitigate the effects of public health impacts - such as large-scale tree planting programs within Concord and surrounding towns.

Please reconsider this proposal, and take into account the negative impact it will have on our community and the environment. The benefits of this project will be highly asymmetric: those that stand to benefit are few, while those who will be harmed are many.

Sincerely,

Joseph Stein  
52 Martha Point Rd  
Concord, MA 01742

**From:** [Kate Chartener](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [Kate Chartener](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 12:01:43 AM

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Dear Mr. Strycky,

I am a Concord resident writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. I am deeply concerned about the economic impact of increased air traffic on the town of Concord and the harm it will cause to our daily lives.

Please seriously reconsider this proposal and take into account the sizeable negative impact it will have on Concord's community and the environment.

I strongly encourage you to focus on alternative solutions that address the growing demand for travel while minimizing the impact on the environment. The Commonwealth's investment in more sustainable forms of transportation is a better way to reduce the environmental impact of air travel. Even this presidential administration has renewed the urgency of smarter energy use, with various incentives to both individuals and corporations...and yet Massport wants to double-down on increasing private air travel?

**Face it, you/Massport will have to dig deeper into sustainable alternatives at some point, so it might as well happen before you irreparably damage the appeal of one of Massachusetts's most famous and beloved towns. And it's a town whose municipal economic impact from tourism is not insignificant- but certainly could become weakened with increased jet traffic rumbling overhead.**

**We all know of places that used to be nicer before greedy development of various sorts surrounded and overtook them ("they paved paradise and put up a parking lot") - please don't be part of the team that contributes to that erosion here, spiritual home to world-renowned Henry David Thoreau.**

Hanscomb happens to be too nestled among suburban residential communities to handle as much traffic as I'm sure many officials would love to jam in, but it just wasn't built for that capacity- full stop. Would that it was more isolated like Otis, but it's not.

There will be a limited number of people who will passingly benefit from an expanded flights schedule; however, a larger number will be permanently harmed. Tangentially, citizens across the country are increasingly getting "billionaire fatigue" - is this the kind of thing our state and local governments want to get behind, at this time? *Et tu, Massachusetts?* We can do better than that!

Concord is a highly-educated community that has long invested a lot of time and money into our town, so Massport should expect that residents will agitate to be fairly compensated for

harms caused by the expansion. Let's avoid that spectacle: keep Hanscom limited. Thank you.

Sincerely,

Kate Chartener  
Concord, MA  
kate@chartener.com



**From:** [K.D](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Public Comment Regarding: EEA #16654: L.G. Hanscom Field North Airfield Development  
**Date:** Tuesday, February 14, 2023 2:45:26 PM

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**Subject: EEA #16654: L.G. Hanscom Field North Airfield Development**

Dear Mr. Strysky:

I am writing to you in regards to the project currently being discussed and evaluated which is called "EEA #16654: L.G. Hanscom Field North Airfield Development." I am a former Lincoln resident who now lives in Concord. I wish at this juncture to share some additional public commentary about this project. I attended the recent Zoom presentation and listened to the Q&A session afterwards too. Many of my concerns and questions were raised and posed. Some of my concerns however were not addressed or raised and it is those to which I will speak here in this email. Having been a lifelong resident of this area I know that change can and does come here and in doing so lasting sometimes impactful irreversible changes are made. So many of the local farms and outdoors spaces I enjoyed as a child have given way to housing developments and shopping centers. On a much more positive note a local family here in Concord, MA recently donated a significant portion of land at the end of Balls Hill Road so that it will be forever preserved and enjoyed by people and wildlife too. So not all change is unwelcome and I have borne witness to positive change. Having lived in Lincoln and Concord, Massachusetts for quite a few years now I also witnessed Walden Pond and Walden Woods be saved from encroachment by developers and the open air local dump site in Concord near Walden Pond and one very close to the Paul Revere Capture site in Lincoln be made far safer for people and the environment too. Again, good changes. I also saw a gradual transformation of the landscape in Minuteman National Historical Park as many modern houses were removed and the landscape returned to a more old-fashioned timeless setting. I share previously stated concerns with other local residents and organizations when it comes to this development project such as impacts to our local air quality, water contamination, increased levels of noise, pollution, and traffic, and impacts to the health of local residents and their families in the immediate vicinity of the development site and farther afield too because as we have seen the world over pollution does not necessarily stay in one place and it can impact much larger areas than the spot where the pollution was initially centered or found. These thoughts and reflections bring to me an issue I have not yet found mentioned or widely discussed if it has already been; this is the impacts this development would have on local farms, their crops, and pollinators. I was recently in touch with a farmer who farms the land directly across Route 2A from the widely used entrances to Hanscom Air Force Base and further down the way to Virginia Road. He works 10 hour days and day in and day out he strives to grow nourishing organic food which is then made available to customers some of whom are local and some of whom live farther away. Yes, I do appreciate that he does not farm in the immediate vicinity of the development site so it could be argued that there are fewer if any impacts to his

farm and the land he cultivates. His farm is not the only one which comes to mind when thinking about how local farms might be negatively impacted by this development project. On Virginia Road there is the Gaining Ground farming operation and just a little ways away from it are two small farms on Bedford Street in Concord. Yes again, it will foreseeably be argued that these four farms are not in the immediate vicinity of the development so why mention them and worry about what repercussions a busier and more developed private air center would have on them. Slightly farther down the road in Bedford, Massachusetts is Chip-In Farm. All of these farms have helped local residents and those who frequent them from farther away put locally grown food on their tables and to feed themselves and their families. Meanwhile, in Lincoln The Food Project, Codman Farm, and LindenTree Farm near Walden Pond are also helping to feed people and are doing their part to make more people food secure, not food insecure. We are living in dire times of food insecurity especially when it comes to widening access to quality nourishing food which has been grown in good soil and is free from as many environmental contaminants as possible. I do sincerely appreciate as I have stated above that most if not all of these farms will be considered by the proposed development's planners as so far outside the zones which would be impacted by this project that they are not worth worrying about and that potentially no time need be devoted to accessing and analyzing the potential impacts to their crops, the health of the land and its pollinators, the farmers, and the longevity of the land if contaminants from air pollution or ground water were to make its way to their fields and crops. What of the bees which have to work so hard already to be pollinators? What thoughts have been given to them as natural spaces would be diminished to make way for more concrete and buildings and planes in the development site? The bees stand to lose out just as much as the farmers who depend on them do because they too obviously need clean air, flowers, and a healthy environment to survive, work, and thrive. It is simply inconceivable to discuss this development project as one whose impacts can be discussed and considered only in the immediate vicinity of the area to be changed and updated and transformed to foreseeably provide leisure and privacy for the few not the many. In my mind, the health and well-being of the bees, the birds, and the seeds which all travel through the airspace in and around Hanscom and which may likely end up touching down on local farms and fields and crops also deserve the same care and attention being devoted to evaluating impacts and threats to the health and well-being of local residents, water, air quality, water quality, and the visitor experiences of those who spend time in Minuteman National Historical Park.

It bears keeping in mind how much both the birds, bees, seeds, wildlife, farmers, and farm land in a larger radius around this development project stand to be negatively impacted by as of yet unquantified ramifications from this development. I wish to ask that assessments be undertaken and discussions start with local farmers and wildlife experts who can speak to the health of not just local soil now so a baseline reading pre-proposed development be on file but also to the health and well-being of the birds and the bees and the seeds too who all need to use the same air which we local residents and visitors soon to be terribly worried will become more toxic for us. In closing, I wish to harken back to the words of John Donne the English poet who gifted all of us who have come after him these immortal words in a poem.

[No man is an island,](#)

Entire of itself.  
Each is a piece of the continent,  
A part of the main.  
If a clod be washed away by the sea,  
Europe is the less.  
As well as if a promontory were.  
As well as if a manor of thine own  
Or of thine friend's were.  
Each man's death diminishes me,  
For I am involved in mankind.  
Therefore, send not to know  
For whom the bell tolls,  
It tolls for thee.

These timeless words could not be more true or more relevant now in relation to this proposed development project. The loss of one bird, one bee, one person in a traffic accident due to more cars coming and going from the base, one farm whose land and crops might be negatively impacted by increased air traffic and pollution impacts us all whether we are aware of it immediately or not. This development is in my mind being described to quote Donne's words shared above as "an island entire of itself" but this is not the case for to quote him further it "is a piece of the continent" and so it is necessary to keep in mind that this project could have far reaching repercussions of which one or many of us who are concerned are simply not aware yet. Each organization, each politician and state representative, and each individual who has submitted public commentary to you about this project is doing so because they know as I do that "for whom the bell tolls, it tolls for thee." We are tolling bells now because we are all in this together; there is so much at stake for creatures great and small and for our natural resources too. Let us have bells ringing now and into the future which ring for good reasons because foresight and care was devoted to saving all that we can from that would negatively impact it. Let us ring bells because forces of good and reason came together to make this development area and the surrounding towns better places for the many, not the few whose planes would only be fined a mere \$400 for coming in outside of approved hours. Let's usher in with your assistance positive changes and positive discussions which incorporate the birds, the bees, the farms, farmers, residents, private plane users, and those who use Hanscom for the very reason that we were aware that as Donne pointed out in this poem we could be "the less" if even one bee or seed or turtle or farm is so easily dismissed and washed away by this tide of development because change for the few was prioritized over the needs and health and security of the many.

Thank-you for taking the time to read my comments.

Best Regards,

Kate Dimancescu

**From:** [Katherine Ives](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development  
**Date:** Tuesday, February 14, 2023 11:42:20 AM

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Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Stryisky:

Our family strenuously opposes further development at Hanscom. We are doing everything we can as individuals to help avert the deleterious effects of climate change for the sake of the natural world and future generations of people: installing a heat pump, planting a pollinator garden, recycling, driving less and driving electric. Expanding the footprint at Hanscom to increase air traffic and pollution is more than a slap in the face of all of us, and we are astonished by Hanscom's clear disregard for our community. We currently suffer from the noise and pollution from increasing corporate jet traffic. We need less not more.

Katherine Ives  
70 Bedford Road  
Lincoln, MA 01773

**From:** [Katrina Kelner](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 2:47:21 PM

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Dear Mr. Strysky,

I am writing in response to the application to MEPA regarding the proposed building of new hanger space at Hanscom Field.

I and many others in my Concord neighborhood are not convinced that this project is one that will be good for the citizens of the nearby towns and the state of Massachusetts.

First, the proposal states that there must be engagement with the local community. This process has not been adequate, as we learned about the project and the comment period only days before comments are due to you. Reading the 100-page proposal does not answer with adequate precision (and data) critical questions such as how the addition of this hanger space will affect the number of flights in and out of Hanscom, in the short and long term. A vague promise that “ferry flights” will decrease is not enough. Planes that are not in flight do not make money. The building of more hangers will mean more flights: “build it and they will come”

Second, putting either public or private resources into an enterprise that supports and expands private jet travel — one of the most environmentally damaging forms of transportation — is unconscionable, given the efforts the State of Massachusetts and its citizens are making toward mitigating climate change. I am dismayed that MassPort is still following a decades-old plan that was conceived before we had accepted the urgency of the climate problem. This plan must be updated immediately. “According to European non-governmental organisation (NGO) Transport & Environment (T&E), private jets are **five to 14 times more polluting than commercial planes per passenger**, and 50 times more than high-speed rail, emitting two tonnes of CO2 in a single hour.” This project helps a small elite minority small elite group at the expense of all the rest of the environment and the vast majority of those who have settled in this area, some for many decades .

Third, the project description ignores or downplays several environmentally damaging aspects of the alterations to the site. Numerous trees would be removed and no effort made to replace the carbon sequestered in those trees and their roots, or to replace the health improvements to air and water provided by them. I also found inadequate the brief description of mitigation efforts for the addition of nearly half a million square feet of impermeable pavement. This is an enormous area: where will the runoff go?; how will toxic substances in the runoff be treated?; how will the enormous carbon cost of generating this concrete/cement be offset? etc

Fourth, what is the economic, cultural, or quality of life benefit to the community of this project, other than to a tiny elite, wealthy, fraction?

In summary this is simply a wasteful project that favors a small group of investors and elites at the the cost of the environment and the vast majority of people. It's a project from the past that has no place in an environmentally conscious state like Massachusetts.

Thank you for considering our points,

Katrina L. Kelner, PhD  
313 Heaths Bridge Rd  
Member, Board of Directors  
Kalmia Woods Corporation  
Concord, MA

Norman Hershkowitz, MD, PhD  
313 Heaths Bridge Rd  
Concord, MA

**From:** [Ken Farbstein](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:23:53 PM

---

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Hello Mr. Strysky and to whom else it may concern,

As a Concord homeowner and voter, I'm writing to express my recommendation to NOT expand Hanscom.

The flying of private planes may be enjoyable for a few, but it comes at the expense of all the rest of us, since it burns fossil fuel that worsens the environmental crisis we're experiencing. We'd all have to pay to mitigate the harm that private plane pilots cause.

Please acknowledge that you've received this.

Best wishes,  
Ken Farbstein, MPP  
office 781-444-5525  
cell 781-635-7646  
website <http://meliorconsulting.com>  
email [KenFarbstein@earthlink.net](mailto:KenFarbstein@earthlink.net)  
mail 152 The Valley Road, Concord, MA 01742-4941

**From:** [Ken Fischl](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Field Expansion EEA #16654  
**Date:** Tuesday, February 14, 2023 10:57:05 AM

---

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Dear Mr. Strysky,

I am writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. As a resident of the surrounding community, I am deeply concerned about the environmental impact of increased air traffic and the harm it will cause to our daily lives. It is already disturbing my work calls, shaking the house, and waking us up at night. The noise has gotten significantly worse over the last 10 years that we have lived in Concord.

Increased air traffic from the expanded airport will result in higher emissions of harmful pollutants, including greenhouse gases, nitrogen oxides, particulate matter, and lead from aircraft fuel. These emissions will contribute to air pollution and further harm the environment. The expansion will also lead to increased aircraft noise at all hours of the day and night.

Given these negative externalities, it is only fair that the surrounding community be compensated for the harm caused by the airport expansion. This compensation could include, but is not limited to, funding for soundproofing of homes, financial compensation for decreased property values, and programs to mitigate the effects of increased pollution on public health.

I request that you reconsider this proposal and take into account the negative impact it will have on the community and the environment. Instead of expanding the airport, I strongly urge you to focus on finding alternative solutions that address the growing demand for travel while minimizing the impact on the environment. Investing in more sustainable forms of transportation, such as trains and electric vehicles, is a better way to reduce the environmental impact of air travel and protect our planet for future generations.

I strongly urge you to prioritize the well-being of the community and the environment before moving forward with this proposal. There will be a limited number of people who will benefit from this, however a larger number will be harmed. Residents should be fairly compensated for harms caused by the expansion.

Sincerely,  
Ken Fischl  
34 Holden Lane  
Concord, MA 01742

**From:** [Beaulac, Kirthana](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: Hanscom Field North Airfield Development  
**Date:** Tuesday, February 14, 2023 12:59:18 PM

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Dear Mr. Strysky,

I am both a concerned citizen of the town of Concord, as well as an employee of the local hospital. I raise my family here, I contribute to community organizations, and care for sick residents of the area.

I have strong objections to the proposed expansion of the hangar complex at Hanscom Airforce Base. This area of Massachusetts prides itself on the actions it takes towards combatting climate change. We are voting in Concord today to provide millions more in funding to the new middle school to ensure that it is carbon neutral. We value clean air, water, and soil. Small private aircrafts are some of the worst offenders in emissions per distance traveled. We are not far from Logan, and do not need the extra flight traffic. I do not believe this expansion is in the best interest of the community. Thank you for taking my opinion into consideration.

Sincerely,  
Kirthana Beaulac

Kirthana Beaulac, PharmD BCIDP  
Antibiotic Stewardship Pharmacist  
Pharmacy Department  
Emerson Hospital  
133 Old Road to Nine Acre Corner  
Concord, MA 01742  
(978)287-7378

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**From:** [Kristen Hough](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Opposing the Hanscom N Airfield Dev  
**Date:** Tuesday, February 14, 2023 3:53:42 PM

---

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Mr. Alexander Strysky  
MEPA Office 14 February 2023  
100 Cambridge St., Suite 900  
Boston, MA 02114  
[Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)

RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

I have been a resident of Bedford, MA for the past 16 years. We live near the north airfield side of Hanscom Airport in a neighborhood of single family homes with many families with children. I myself have 5. I strongly oppose this massive expansion project that will have a severe negative impact on the health and quality of life of children and families as well as the environment. Premium air travel for a few corporate elite at the expense of the health of our children, families and our environment is unconscionable.

This airport expansion is a colossal step backwards in our efforts against climate change, an existential threat to our planet. This expansion negates all the efforts Massachusetts has made towards reducing our carbon footprint. There is a vast amount of data on the impact of air and noise pollution on our children and our environment. This expansion project, over a 50% expansion in square footage, will result in children being exposed to lead and other carcinogenic emissions. Of particular concern are children who live within 5 miles of the expansion, including the hundreds of children who play at the athletic fields located directly across the street from the proposed expansion project.

Massachusetts has been leading the way to reduce our carbon footprint. As we have seen change at such an accelerated pace, this is no longer climate change, it is climate catastrophe. To propose an expansion of this magnitude as we face an unprecedented existential crisis of climate catastrophe is profoundly irresponsible, disappointing and dangerous. This expansion is proposed in a densely populated area with families with young children in close proximity. If we allow this expansion, then we are failing our children and our planet.

By Massport's own admission previously, the goals of this project are to increase profitability of the airport and to provide private jet travelers a more luxurious and private travel experience. This expansion is a money grab catering to the corporate elite at the expense of children, families and the environment.

Reference is made to the letter HFAC submitted in opposition to this expansion project and all comments incorporated herein. Additionally, please find concerns below including but not limited to the following:

- Increased jet traffic, carbon, lead & other poisonous gas emissions, and noise, including jet engine startups, taxiing and maintenance
- The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase.
- Health and safety effects to our children and families, living close to the airport, in particular, for all kids

playing on The Edge fields

- The overall impact of this airport on climate change is certain to be harmful to our planet
- There will be aircraft refueling (possibly with underground tanks) directly over an aquifer and yards away from Hartwell Road
- There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced
- Over 34 acres of forest with mature trees will be cleared and paved over, creating an overheated microclimate
- Hanscom Field adjoins Great Meadows National Wildlife Preserve. Therefore, this project will endanger protected wildlife
- There will be increased road traffic (including trucks) both pre and post construction along with air contamination during construction
- There will be huge water runoff in storms (with some fuel contamination)
- There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments
- This is for the benefit of corporate executives and companies that can afford to buy and use private jets

Based upon the aforementioned concerns, my family and I strongly oppose the North Airfield Development project.

Sincerely,  
Kristen Hough  
25 Liberty Road  
Bedford, MA 01730

[Sent from Yahoo Mail for iPhone](#)

**From:** [Laura W Davis](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 11:38:49 PM

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To whom it may concern,

As a concerned citizen, I am writing to voice my opposition to the proposed North Airfield Development at L.G. Hanscom Field.

Private jet travel is among the most carbon-intensive forms of transportation, and in order to avert the worst impacts of climate change, it is imperative that decision makers in both the public and private sectors work diligently to reduce reliance on this excessively inefficient form of transport.

At Hanscom Airfield, the number of civilian jet operations has been on the rise despite the pandemic. Between 2018 and 2021, recorded jet operations increased by nearly 10%, with Massport reporting 33,629 civilian jet flights in 2021. This trend cannot continue unchecked if we hope to meet our climate goals.

The North Airfield Development's Environmental Notification Form (ENF) fails to address the most significant environmental impact that the project is poised to have on the region, namely the impact on the total number of flights operating out of Hanscom. The ENF contends that expanding on-site aircraft storage with 495,000 square feet of hangar space will minimize the need for "ferry flights" from other local airports. However, the ENF does not provide any information on whether this reduction in short-distance "ferry flights" may lead to an increase in the overall number of flights or the percentage of flights traveling to more distant destinations.

A thorough assessment of the potential change in the airport's traffic volumes and patterns must be completed and made available to the public. The environmental impact of any change in this area is potentially far more significant than the energy efficiency of the buildings, the potential for rooftop solar, the installation of electric chargers for cars and trucks, or the number of cars traveling to the facility, all of which are documented in the ENF.

To put the relative environmental impact of the air traffic into perspective, a Gulfstream 450, an aircraft that currently operates out of Hanscom, generates 5 metric tons of carbon emissions per flight hour. A single one-way flight from Hanscom to Los Angeles on this aircraft creates approximately 30 metric tons of carbon emissions, an amount equivalent to the emissions from heating and powering 3.8 homes for an entire year.

The recent expansion project at Van Nuys Airport (KVNY), a similar general aviation airport in Southern California, serves as a cautionary tale for our community. Last year, the airport added 66,000 sq ft of hangar space to meet the growing demand from business aviation clients, which is relatively modest compared to the half-million square feet of hangar space proposed at Hanscom. Two months after completing the project, NPR reported that the runway and hangar improvements led to an increase in air traffic at the facility, sparking

concern among local residents about air quality.

When responding to concerns about increased air traffic and associated pollution from residents of the nearby working-class neighborhood, a representative from Van Nuys stated, "We can't regulate the number of flights coming into Van Nuys. We can't institute a cap. We have no ability to close down the airport at a certain hour. Those are just things that are not allowed under FAA regulations."

The idea that airport operators will have their hands tied if Hanscom's massive expansion project results in a significant negative impact on the community is deeply troubling. This scenario points to the need to limit significant expansion of existing infrastructure in order to protect public health and preserve our ability to address the emissions crisis.

Simply put, we cannot afford to massively expand capacity for private jet travel in the midst of a climate crisis. The transportation sector is the largest contributor to climate change in Massachusetts, responsible for 37% of statewide emissions in 2020. Instead, we must work to invest differently in our transportation system to ensure a stable climate for our collective future.

Sincerely,  
Laura Davis  
Concord, MA 01742  
[lewolfgang@gmail.com](mailto:lewolfgang@gmail.com)

**From:** [Lauren Herbert](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:18:33 PM

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To Whom It May Concern,

I strongly oppose the development of the Hanscom Field North Airfield.

I am a resident at Battle Road Farms, and live close to the airfield.

I frequently walk at Minute Man National Park, and I often am very dis-heartened to find that I am breathing in jet fuel fumes, when I had hoped to enjoy nature and fresh air.

I believe that we all have the right to breathe fresh air, and I believe that the quality of the air I breathe will be negatively impacted by expansion of the airfield.

Thank you for your consideration,

Lauren Herbert

Lincoln, MA

**From:** [Lila Selle](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 6:22:53 PM

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Dear Mr. Strysky,

My name is Lila Selle. I grew up in Concord, and as a former resident of 20+ years, I am strongly opposed to the proposed expansion and modifications at Hanscom (EEA #16654: L.G. Hanscom Field North Airfield Development ENF) on environmental grounds.

Sincerely,  
Lila



February 14, 2023

[Via email to Alexander.Strycky@mass.gov](mailto:Alexander.Strycky@mass.gov)

Alexander Strycky

MEPA Office

100 Cambridge Street, Suite 900

Boston, MA 0211

**Subject: EEA #16654: L.G. Hanscom Field North Airfield Development**

Dear Mr. Strycky:

This letter is submitted on behalf of the Lincoln Green Energy Committee (“GEC”), which comprises individuals appointed by the Town of Lincoln Select Board. The GEC serves as the Town’s primary resource to identify and promote ways to reduce Lincoln’s greenhouse gas emissions. As discussed further below, we are concerned that the proposed development (“the Project”) would lead to a substantial increase in greenhouse gas emissions that would be inconsistent with the urgent need to address the climate crisis and with the timetable for emissions reduction set by the so-called “Roadmap Act” for state climate policy enacted in 2021.

Air travel is a major source of greenhouse gas emissions; we need to shift our culture and economy in the direction of less air travel, not more. Further, air travel via small jets has a much greater impact per passenger mile and therefore should be discouraged – not facilitated and expanded, as the Project apparently would do. In other words, to the extent the Project leads to an increase in passenger miles flown via small jets (because of increased hangar space for small jets, greater convenience, etc.) that otherwise would have been flown in large jets that have much less emissions per passenger, that in itself would be a cause of increased emissions.

We endorse the comments on the Project already filed by the Lincoln Select Board (dated Feb. 10) and by the Hanscom Field Advisory Commission (dated Feb.9) to the extent they relate to the climate impacts of the Project and identify questions that the analysis under the

Massachusetts Environmental Policy Act ("MEPA") should address. That includes items numbered 2 through 7 in the Select Board letter and items 1 and 4 through 7 in the HFAC letter. In particular, we want to stress the need for the MEPA analysis to include a rigorous and transparent method of estimating how much of an increase in greenhouse gas emissions can be expected to result from the Project. That methodology should include among other things an estimate of how many additional flights per year, of what type, and the resulting emissions, compared to if the Project is not completed. That methodology should also include estimates of how many more passenger miles will be via small jets versus large-jet travel, and the net emissions impact of that substitution.

We also note that the Town of Lincoln is developing a Climate Action Plan for how we will reduce our carbon emissions and thereby mitigate the impacts of climate change locally on the lives of our residents and globally on the lives of all mankind. The Town has already begun accounting for its carbon emissions and seeking means to reduce them comporting with the Commonwealth's 2021 Roadmap Act. That is another reason we request that Massachusetts Port Authority ("Massport") develop a methodology for estimating and reporting estimates for greenhouse gas emissions caused by its current and future flight operations. Massport's methodology should be developed with opportunities for comment by Hanscom Field Advisory Commission and the Towns it represents. If the Project or some form of it goes forward, Massport should also issue an annual report with monthly granularity: (1) Hanscom aviation refueling quantities summarized by fuel type and dispensing operator, (2) Hanscom flight operations summarized by ports of embarkation and debarkation and aircraft type, and (3) estimates of the ensuing carbon emissions.

The MEPA analysis of the Project's impact on the Commonwealth's climate goals should also include calculation of the effect of extensive tree removal associated with the project (over 30 acres), which will eliminate those trees' ability to continuously remove and sequester carbon from the atmosphere. The MEPA analysis should also identify how the removed trees will be disposed of or otherwise managed, to identify how much of their sequestered carbon will be released and how fast.

In conclusion, we believe the Project, if not stopped, would increase greenhouse gas emissions from Hanscom flight operations and thus make it even harder for our community and the Commonwealth of Massachusetts to reduce such emissions as required by the Roadmap Act. We demand, consistent with the requirements of MEPA, that the Project proponents and Massport provide quantitative estimates of net impacts on greenhouse gas emissions, backed by detailed methodologies as discussed above, to allow an informed decision with public input and scrutiny as to whether the Project should be permitted.



Alexander Strycky

February 14, 2023

Page 3

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "P Shorb", with a long horizontal flourish extending to the right.

Paul Shorb

On behalf of the Lincoln Green Energy Committee:

Roy Harvey

Ed Kern

Sue Klem

Ed Lang

Paul Shorb (Chair)

C.J. Volpone



# Lincoln Land Conservation Trust

145 Lincoln Road, Suite 102A  
P.O. Box 10  
Lincoln, MA 01773  
Telephone: (781) 259-9250  
e-mail: [LLCT@LincolnConservation.org](mailto:LLCT@LincolnConservation.org)

## TRUSTEES:

Susan Allen, Vice-Chair  
Michelle Barnes, Chair  
Kenneth Bassett  
William G. Constable,  
President  
Daniel England  
Andy Falender  
Andrew Gnazzo,  
Vice-Treasurer  
James Henderson  
Weston Howland, III  
Diana Jong  
Gwyneth Loud  
Robert Mason  
Ellen Meadors,  
Treasurer  
Paul Shorb  
Nancy Soulette,  
Secretary  
Andrew Stevenson  
Susan Welsh

## STAFF:

Geoff McGean,  
Executive Director  
Bryn Gingrich  
Assistant to Executive  
Director  
Jane Gruba-Chevalier,  
Director of Outreach  
Jane Layton  
Stewardship Coordinator

February 14, 2023

Via email to [Alexander.Stryisky@mass.gov](mailto:Alexander.Stryisky@mass.gov)

Alexander Stryisky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
[Alexander.Stryisky@mass.gov](mailto:Alexander.Stryisky@mass.gov)  
(857) 408-6957

RE: EEA#16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Stryisky,

It is the Lincoln Land Conservation Trust's (LLCT's) mission to protect the rural character of Lincoln by holding conservation land in trust for the benefit of the residents of Lincoln and the general public. *The LLCT is writing to express our strongest disapproval of the Hanscom Field North Airfield Development ENF expansion plans.* We concur with other letters of dissent regarding this project sent by fellow organizations including the Lincoln Select Board, the Lincoln Green Energy Committee, the Hanscom Field Advisory Commission and WIDE Lincoln which cite environmental, ecological, climate and environmental justice concerns about this planned development. Their specific requests for data and analysis should be granted before proceeding with development. To that list we would add analysis of what local land in neighboring communities could be purchased and placed under conservation restriction in order to act as a sufficient offset to the inevitable net increase in greenhouse gas emissions this development project would engender.

We also would like to emphasize the harmful impact this project would have in perpetuity to wildlife, its habitat, and the functioning of wetlands so important for climate change resilience. We strongly encourage further evaluation of the harms and benefits of this development as the environmental, ecological, climate and environmental justice costs to the public and climate appear to far surpass its private benefits for a few.

Sincerely,

Geoff McGean  
Executive Director

Michelle L. Barnes  
Board Chair

Linda and Robert White  
3 Glenridge Drive - Bedford, MA 01730  
[Lindawhite1@juno.com](mailto:Lindawhite1@juno.com) – [Robert\\_white@hms.harvard.edu](mailto:Robert_white@hms.harvard.edu)

February 14, 2023

Alexander Strycky MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114 [Alexander.Strycky@mass.gov](mailto:Alexander.Strycky@mass.gov) (857) 408-6957

RE: MEPA Project 16654, "L.G. Hanscom North Field Airfield Development"

Dear Mr. Strycky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

The proposed North Airfield project will have numerous negative impacts on the environment and on residents:

- The plan will result in an increase in jet traffic. Noise, air, carbon emission, and light pollution will negatively affect the residents of Bedford, Concord, Lincoln, and Lexington.
- Areas around Hanscom Field are already superfund sites. The addition of a fueling site will only add to the hazards, in addition to the transportation of fuel through our community.
- The area is home to coyotes, frogs, deer, turkeys, rabbits, and countless other animals and birds that will lose their habitat.
- Trees and other plants will be replaced with hard surfaces impacting water runoff and creating a heat island.
- Carbon emissions: This proposal is contrary to current carbon emissions goals of our community, state, and federal governments. Adding 27 large jet hangars with over 50 corporate jets will permit travel with 5-8 times the carbon emissions per passenger as commercial jets.
- Environmental impacts: These include: jet traffic; aircraft noise; fueling operations and storage tanks; massive contaminated stormwater runoff from \*30 acres\* of NEW pavement & buildings; heat island effects from the paving over of forest & brush areas; and loss of natural habitat for local fauna.
- Health and safety: This will have well-documented health effects on our children living so close to this massive expansion, with increased particulate emissions from aircraft, car and truck traffic right next to our homes and along Hartwell Road and The Edge sports complex.
- Social responsibility: This project is a pure handout to wealthy executives at companies with the money to support private jet travel, with no direct benefit to the general public, and great harm to the surrounding communities.

We oppose this plan that will harm so many local residents while benefiting a handful of corporate and private jet owners.

Sincerely,

*Linda D. White and Robert R. White*

Linda D. White and Robert R. White



**From:** [Linda Lazar](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:28:30 PM

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Dear Mr. Strycky,

I am writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. As a resident of the surrounding community, I am deeply concerned about the environmental impact and with what will inevitably be increased air traffic and the harm it will cause.

Increased air traffic from the expanded airport will result in higher emissions of harmful pollutants, including lead from aircraft fuel, greenhouse gases, nitrogen oxides and particulate matter. The expansion will also lead to increased aircraft noise at all hours of the day and night.

Given these negative externalities, if the expansion goes through it is only fair that the surrounding community be compensated for the harm caused by the airport expansion. This compensation could include, but is not limited to, funding for soundproofing of homes, programs to mitigate the effects of increased pollution on public health and negative effects on property values.

I request that you reconsider this proposal and take into account the negative impact it will have on the community and the environment. Instead of expanding the airport, I strongly urge you to focus on finding alternative solutions that address the growing demand for travel while minimizing the impact on the environment.

Investing in more sustainable forms of transportation, such as trains and electric vehicles, is a better way to reduce the environmental impact of air travel and protect our planet for future generations.

I strongly urge you to prioritize the well-being of the larger community and the environment before moving forward with this proposal. There will be a limited number of people who will benefit from this, however a larger number will be harmed, and residents should be fairly compensated for harms caused by the expansion.

Sincerely,

Linda Lazar  
308 Holden Wood Road  
Concord, Massachusetts

978-494-4590

**From:** [Linda Rudd](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 8:54:50 PM

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As a concerned Bedford citizen, I am writing to voice my strong opposition to the proposed expansion of the Hanscom Field Hanger. The project presents many different types of concerns, including:

- The overall environmental impact of increased aircraft traffic, inclusive of carbon and poisonous gas emissions
- Increased noise pollution for Bedford and surrounding communities
- Increased road traffic, congestion and auto emissions
- Increased demand on Bedford's water and sewer systems
- Increased risk of water contamination
- Deforestation/negative effects on the surrounding ecosystems, including the Minuteman Historical Park and the Great Meadows National Wildlife Preserve

It is clear that the sole intention of this project is to benefit corporations and service the interests of the wealthy, with no tangible benefit to the community at large. Since this project presents no advantages for the average Bedford citizen – or the citizens of surrounding communities – it cannot and should not move forward.

Linda Rudd  
9 Flintlock Drive  
Bedford, MA 01730

**From:** [Marcie Karty](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Fw: opposition to Hanscom Airfield expansion  
**Date:** Tuesday, February 14, 2023 9:47:02 AM

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----- Forwarded Message -----

**From:** Marcie Karty <mrkarty@yahoo.com>  
**To:** carmine.gentile@mahouse.gov <carmine.gentile@mahouse.gov>; mike.barrett@masenate.gov <mike.barrett@masenate.gov>  
**Sent:** Monday, February 13, 2023 at 07:11:18 PM EST  
**Subject:** opposition to Hanscom Airfield expansion

Representatives,

I am writing to voice my opposition to the Hanscom Airfield expansion. Such a large airfield has no place in Lincoln and takes away from the culture of both the town and the MinuteMan historical park adjacent to it. Please let me know if you have questions.

Dr. Marcie R. Black 173 Bedford Rd. Lincoln

**From:** [Margo Fisher-Martin](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Expansion  
**Date:** Tuesday, February 14, 2023 7:40:52 AM

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Hi,

I am a resident of Lincoln. My family has lived here for 30 years. We strongly oppose the expansion to Hanscom. We have seen flights constantly increase overhead for years. There is already a high incidence of cancer in this area and likely some of that as a result of emissions. This expansion will benefit only those who need a place to keep their jets and Massport, and will definitely impact the environment and traffic patterns - which are bad enough already. I attended the webinar offered on Feb 6th and the consultants had very few answers about waste, emissions etc. They attributed issues to "ferrying" people back and forth to Hanscom but had no hard evidence.

Please do not allow the expansion to move forward!

Respectfully,

Margo Fisher-Martin  
14 Giles Rd, Lincoln, MA 01773



**From:** [Mark Gailus](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Hoffer, Melissa \(GOV\)](#); [Czepiga, Page \(EEA\)](#); [Kim, Tori \(EEA\)](#)  
**Subject:** RE: North Airfield Hangar Development Proposal at Hansocm  
**Date:** Tuesday, February 14, 2023 3:57:44 PM

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February 14, 2023

Mr. Alexander Strysky, MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: North Airfield Hangar Development Proposal

Dear MEPA Environmental Analyst Mr. Strysky:

There is no way that this proposal will not cause serious harm to the environment and especially to the children and other residents living in the designated Environmental Justice Community and other residential neighborhoods that it adjoins.

Air pollution from jet exhaust and other vehicle exhaust, risk of major fires and groundwater pollution from fuel storage and ongoing fuel loading and aircraft fueling operations, noise pollution, and increased road accidents due to the conversion of residential roads to major airport access routes including use by more and larger vehicles would all be part of the unavoidable destructive impacts of permitting this proposal.

This proposal is in no way consistent with Massachusetts policy for achieving climate protection goals.

Thank you for your consideration.

Sincerely,

Mark Gailus and Tanya Gailus  
62 Prescott Road  
Concord, MA 01742

**From:** [Mark Myles](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [tackerman@concordma.gov](mailto:tackerman@concordma.gov)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 1:49:43 PM  
**Attachments:** [Hanscom Noise Workgroup Report - Sept 1999.pdf](#)  
[Strysky MEPA letter 14feb2023.pdf](#)

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Dear Mr. Strysky

Please find attached a PDF version of my letter to MEPA regarding the subject ENF. This letter also references the Report of the Hanscom Field Noise Workgroup, which is the second attachment here.

sincerely

Mark Myles

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298 Heaths Bridge Rd. Concord, MA 01742 USA +1 978.371.9144 (mobile)

Via email to [alexander.strysky@mass.gov](mailto:alexander.strysky@mass.gov)

Mr. Alexander Strysky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114

Ref: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky

I wish to address issues related to noise from Hanscom Field that could be affected by the proposed Hanscom Field North Airfield Development.

In 1997, the Massachusetts Secretary of the Environment asked Massport to commission a workgroup with a mission “to contribute to the reduction of current and long-term noise impacts of aviation operations at Hanscom Field...” I was appointed by the Concord Board of Selectmen (now the Select Board) to represent Concord on this body, which became known as the Hanscom Field Noise Workgroup; I chaired the Taskgroup on Noise Metrics and Modeling within the Workgroup. The Workgroup published a detailed report in September 1999, which I have attached to this email.

Though over 23 years old, the Workgroup’s report included many recommendations, with detailed technical analyses to back them up, on its two main areas of study - Noise Abatement and Mitigation, and Noise Metrics and Modeling – that remain relevant today. I urge that these recommendations be addressed in the Draft Environmental Impact Study (DEIS) mandated by MEPA.

**I stress that, while the proposed North Airfield Development deals only with ground infrastructure, it will have impacts on the noise emitted by flight operations, and thus on quality-of-life issues experienced by citizens on the ground.** I base this conclusion on my experience of serving on the Noise Workgroup: changes in fleet mix, numbers of takeoffs and landings, the time of day those operations take place, the origins and destinations of flights, and many other factors all contribute to the noise experienced by people on the ground. The proposed development will likely attract different users to Hanscom, change the fleet mix, change the number of takeoffs and landings, change their direction of flight, and so on. Thus, the DEIS must project such changes and the resulting changes to noise impacts.

After the presentations and comments we heard at the MEPA forum on the Environmental Notice Form of 6 February 2023, I came away with numerous questions and concerns:

1. A primary rationale for the proposed North Airfield Development clearly appears to be the anticipated reduction in ‘ferry flights’ which, because of limited storage facilities at Hanscom, are flights that takeoff and land without passengers so that airplanes can be hangered at a different airfield. However, despite several questions on this subject, no data was presented to support this rationale. Thus:
  - **The DEIS must include verifiable data on the number and frequency of ferry flights - both current and projected.** These data should be expressed both in absolute numbers and proportions (percentages) of total flight operations. These data will also have impact on other environmental factors in addition to noise.

2. Beyond the question of ferry flights, the proposed new facilities would presumably attract additional permanent resident aircraft at Hanscom. Thus:
  - **The DEIS must address noise impacts specifically**, and *not* presume that, because the development is strictly a project devoted to ground-based infrastructure, it would not affect the noise impact from flight operations experienced by people on the ground.
  - **The DEIS should incorporate noise metrics** due to anticipated changes. In particular, it should incorporate metrics recommended in the *Report of the Hanscom Field Noise Workgroup*: EXP, DNL, SEL/D, and Community Noise Metrics. (Page 60 and following.)
  - **The DEIS must include projections on changes in overall numbers of takeoffs and landings** that would result from the proposed development. In other words, it should answer the questions: “Will the proposed development attract additional flight operations that would not take place without it, and what is the anticipated increase (or decrease) in numbers?”
  - **Such data must include changes to fleet mix at Hanscom**, as the availability of new hangers would presumably attract more, different, and possibly noisier aircraft. Although designated as a General Aviation Airport, Hanscom has begun, in recent years, to host more commercial charter flights using larger commercial airplanes, like Boeing 737s and Airbus 320-series, normally seen at major airports like Boston Logan.
  - Based on data for the number of operations described in the previous points, **the DEIS should address how changes in the number of flights and fleet mix would change the noise experienced by people on the ground**, using established noise metrics and models.
  - **The DEIS should also predict whether changes in aircraft using the field would change their destinations and origins**. Direction of flight affects noise at different locations on the ground.
  - **These data should be based on future flight operation projections** that, presumably, are available from Massport.
  - The DEIS should include noise and other environmental data that can be used to **ascertain the impact on property values in the four Hanscom area towns**.
  
3. As stressed earlier, the proposed ground infrastructure development itself can be expected to affect noise. Thus:
  - The ENF states that positioning of the new buildings can be helpful in reducing noise radiating toward nearby neighbors. **The DEIS should quantify this anticipated reduction in sound transmission, as well as the anticipated sound levels that would exist at the northern boundary of the airfield**.
  - The proposed development would position operating aircraft close to neighborhoods in Bedford – closer than those at the other Hanscom borders in the other three towns. Thus, **the DEIS should model and quantify anticipated noise levels beyond the northern boundary of the airfield. If above establish levels for noise mitigation (i.e., DNL above 65 dBA), a noise barrier should be designed and built**.
  
4. Noise impacts can be significantly improved by adopting mitigation measures. Thus:
  - **The DEIS should specifically recommend noise mitigation procedures pertaining to the additional ground facilities**, such as those recommended by the *Report of the Hanscom*

*Field Noise Workgroup* (page 34 and following). Additional recommendations might pertain, but not be limited, to:

- i. Thrust/engine speed used in ground operations
- ii. Guidelines for the amount of time spent with engines on while aircraft are stationary
- iii. Using hanger doors to limit sound emission
- iv. Specific guidelines for particular aircraft types to limit noise emissions

5. **The DEIS should specifically address additional questions regarding potential changes that would indirectly influence noise generation** (as well as other environmental factors);

- i. Would the proposed development lead to establishment of additional or expanded Fixed Based Operators (FBOs)? Would such establishment increase the number of aircraft using Hanscom?
- ii. Would the development lead to additional refueling capability? Would this create more demand for using Hanscom?
- iii. Would the development attract additional development (hotels, restaurants, etc.) that would create their own environmental impacts?
- iv. Would new traffic patterns, with additional noise and other environmental impacts, be created?

In summary, noise and other environmental impacts go well beyond those described for the proposed North Airfield Development in the developers' ENF. **The forthcoming DEIS must address these impacts specifically and comprehensively.**

Respectively submitted

Mark M. Myles  
298 Heath's Bridge Road  
Concord, MA 01742

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REPORT  
of the  
**HANSCOM FIELD  
NOISE WORKGROUP**

22 September, 1999

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## Letter of Transmittal

22 September, 1999

Ms. Virginia Buckingham  
Executive Director,  
Massachusetts Port Authority  
One Harborside Drive  
East Boston, MA 02128-2909

Dear Ms. Buckingham:

In 1997, the Massachusetts Secretary of the Environment, in response to issues raised in the 1995 Hanscom Field GEIR Update, asked Massport to "...form a Workgroup made up of its own noise experts and interested, knowledgeable members of the communities surrounding Hanscom..." to consider issues relating to the measurement and abatement of noise, and the content and form of the noise discussion that Massport will include in the year 2000 Hanscom GEIR update. In the spring of 1998, such a Workgroup was formed under Massport auspices, and it has continued its deliberations until the present. Its work is now complete, and the Final Report is herewith submitted.

The Workgroup is pleased to acknowledge the support of Massport personnel throughout this study. In particular, we would like to thank Tom Ennis, Project Manager, Environmental Planning and Permitting; Sara Arnold, Manager, Airport Administration, L.G. Hanscom Field; and Richard Walsh, Government/Community Liaison, for their active and constructive assistance in all phases of this effort. We thank Massport for funding the participation of Robert Miller, of Harris, Miller, Miller, Hanson, Massport's noise consultant, and express our appreciation for his thoughtful input to the process.

The Undersigned, Members of the Hanscom Field Noise Workgroup, hereby signify our unanimous agreement with this Final Report. We earnestly present our findings and recommendations to Massport, to our organizations, and to our fellow citizens for their consideration and adoption. We acknowledge that our signatures do not bind our organizations.

Michael Bahtiarian  
Town of Bedford

Reinier Beeuwkes  
Town of Concord

Bill Brooks  
Minuteman National Historical Park

Julian J. Bussgang  
Town of Lexington

Bruce Campbell  
Town of Lincoln

Donald L. Dawes  
Hanscom Field Advisory Commission (HFAC)



1st Lt. David L. Englin  
Hanscom Air Force Base

Bill Fuchs  
Minuteman National Historical Park

Anthony G. Galaitsis  
Town of Lexington

Janet M. Kennedy  
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Mark Myles  
Town of Concord

Jeffrey Parker  
Town of Bedford

Neil Rasmussen  
Safeguarding Historic Hanscom Area's Irreplacable Resources (ShhAir)

Edward Rolfe  
Town of Lincoln

Dan Schrager  
Hanscom Airport Resource Team (HART)

Bradford L. von Weise  
Hanscom Airport Resource Team (HART)

John D. Williams  
Safeguarding Historic Hanscom Area's Irreplacable Resources (ShhAir)

## BACKGROUND

Laurence G. Hanscom Field is an airport located in eastern Massachusetts, about 18 miles from Boston. Its boundaries overlap the borders of four historic towns- Bedford, Concord, Lexington, and Lincoln. Since 1974 Hanscom has been owned and operated by the Massachusetts Port Authority (Massport). The facility includes paved runways of 5100 and 7000 foot length, served by an FAA control tower. Several active flight school, charter and fixed base operations are located on the field. The Field is adjacent to a major United States Air Force facility, Hanscom Air Force Base, which includes the Air Force Electronics Systems Center, and the 66<sup>th</sup> Air Base Wing which manages logistics for regional operations. Heavy and high performance military aircraft are frequent visitors.

Hanscom Field is New England's busiest general aviation airport, handling more than 183,000 operations in 1998. The number of visitors flying in each year is estimated to exceed 100,000. More than 300 people are employed on the Field by Massport and aviation-related businesses. Massport estimates the total economic impact of the Field at \$70 million. There is (as of August 1999) no scheduled air carrier service at the airport, but the many charter (Part 135 and Part 121) operations employ aircraft ranging from single engine piston to business jets and 727's.

The surrounding Towns are of a low density residential nature and have great historic and environmental significance. Minuteman National Historical Park, created to commemorate the historic events of April 19, 1775, includes over 900 acres of land, much of which directly abuts the airport boundary. Great Meadows National Wildlife Refuge, home to important migratory water fowl, lies under the Field's western approach and departure paths. Thoreau's Walden Pond, the Old North Bridge and the homes of Louisa May Alcott, Nathaniel Hawthorne and Ralph Waldo Emerson all are located within 3 miles of the runway ends. Accordingly, there is a high level of community interest and involvement in all issues relating to the Field, especially those relating to environmental impact.

In accordance with State statute, Massport is required to submit to the State regular reviews which describe and evaluate the environmental effects of present and projected activities at the airport. These reviews are subject to comment by all interested parties and formal Topic Review Committees.

In 1997, the Massachusetts Port Authority (Massport) submitted its 1995 Hanscom Field Generic Environmental Impact Report (GEIR) Update to the Executive Office of Environmental Affairs of the Commonwealth of Massachusetts. In June of 1997, the then Secretary of

the Environment, Trudy Coxe issued a formal Certificate to Massport which responded to issues raised in the GEIR and by community-based GEIR Topic Review Committees. In the Noise subsection of the Certificate, the Secretary noted:

“...the text and comment letters raise serious questions about some of the data, protocols, analysis, and (especially) , proposed mitigation, which need to be answered before Massport begins its 2000 update.”.

The Secretary further went on to request that:

“In the draft section 61 filing Massport should commit to form a Workgroup made up of its own noise experts and interested, knowledgeable members of the communities surrounding Hanscom, or their representatives, to determine and agree upon 1) an appropriate baseline to use as a starting point for measuring Hanscom Field's noise impacts on the surrounding communities and on the value of information derived using that baseline, 2) the metric, or set of metrics, that best describe not only absolute noise values but also the perceived impact of noise events, 3) responsibility, schedule, and nature of mitigation for agreed-upon levels of increases in noise impacts, and 4) the content and form of the noise discussion that Massport will include in the 2000 GEIR update. I expect that Massport will issue invitations to appropriate parties to join this Workgroup by the end of this summer and that the MEPA Unit will be kept informed of the status of the Workgroup's formation and subsequent work in progress. I encourage members of the public willing to participate in this work to make their interest and availability known to Massport. If no members of the public are willing to work with Massport to develop this agreement, the scope for the 2000 GEIR update will detail requirements in these areas, but will lack the benefit of this public process.”

(GEIR Update Certificate, June 30, 1997 P.7-8)

In September, 1997, Massport submitted its Draft Section 61 Finding for potential future projects, supplemental information, and response to comments relating to the 1995 Hanscom Field GEIR update. Within this Section 61 finding Massport responded to the request for a Workgroup.

" Massport recognizes, and asks that the Secretary recognize, the extent of federal preemption concerning the noise emissions of aircraft and noise standards. Even so, Massport proposes to invite two representatives each from the four Hanscom area towns (HATS) communities, the Hanscom Area Resource Team (HART), Safeguarding the Historic Hanscom Area Irreplacable Resources (ShhAir), the Hanscom Field Advisory Commission (HFAC), and the Minutemen National Historic Park (MMNHP) to serve as the noise Workgroup suggested in the certificate. Recognizing that long-term discussion on this topic in the past came to no conclusion, Massport proposes to set a six-month time limit on discussions with this group, after which, if no agreement can be reached, Massport will continue with routine noise analyses using nationally-approved techniques and standards. Note that, as reported in the 1995 GEIR update, Massport will continue with its ongoing enforcement of the Hanscom noise rules. Further, Massport now is working with the ad hoc working group of the HFAC to develop and implement a "friendly flyer" program at Hanscom field. In addition, Massport will explore with the noise Workgroup operational procedures that, if accepted by the FAA, might reduce the extent of noise impacts at and near Hanscom."

In the spring of 1998, Massport issued invitations to the community groups listed in its response to the Secretary of the Environment. In addition, community representatives were selected by selectmen from each of the four adjoining towns - Bedford, Concord, Lexington, and Lincoln).

The first meeting of the Workgroup took place on April 28, 1998. Twenty-eight representatives attended, including four from Massport in their official capacity. This initial gathering was contentious, and little was accomplished except to make clear to the participants that progress would require substantially greater commitment to cooperation.

In the second meeting, May 26th, real progress was achieved. A chairperson was selected from among the community representatives, and a statement of goals and procedures was discussed and prepared for adoption.

At the third meeting on June 23rd the mission statement and procedures, as amended, were adopted. By that meeting, a Workgroup E-mail address had been established to facilitate rapid communication

among members. Also, in the June 23rd meeting, two subgroups were created. One was established to review issues relating to noise abatement and mitigation, and the second to deal with matters relating to noise metrics and modeling. Each of these "Taskgroups" was made up of Workgroup members whose interest or expertise lay in that topic area. Plans were made for each of these Taskgroups to meet regularly between the meetings of the entire Workgroup. This schedule - meetings of each Taskgroup at least once per month followed by a meeting of the whole Workgroup on the fourth Tuesday evening of a month - was followed through April, 1999. Presentations of importance to all members of the Workgroup were scheduled to be made in the regular full group meetings. Presentations of particular interest to one or the other of the Taskgroups were presented during the intermediate meetings. These were open and announced to the entire group, but focused on the interests of the particular Taskgroup.

Thus, by the third meeting, a Mission Statement had been adopted, regular attendance had been established by most of the community, business, and Air Force representatives, and a regular program of meetings and presentations put in place.

A list of Workgroup members, their affiliations and brief biographies is supplied below. It should be noted that these members brought very substantial qualifications and experience to the Workgroup. More than half have professional degrees, including four at the doctoral level. Six own or operate businesses. Five are pilots, and three are full-time noise professionals. Most have been involved in Hanscom Field issues for many years. All have made a major commitment of time and energy to the success of this important effort.

## MISSION STATEMENT

The mission of the Noise Workgroup is to contribute to the reduction of current and long-term noise impacts of aviation operations at Hanscom Field by working toward mutual agreement on the following subjects:

1. Understand, identify, and recommend the metrics and modeling which best describe both the absolute level and the perceived impacts of noise events.
2. Understand the noise environment in the Hanscom communities.
3. Qualitative and where possible quantitative assessment of noise impacts in the Hanscom communities
4. Appropriate and relevant noise standards
5. Proposed noise abatement and mitigation measures for current and future noise impacts.
6. The recommended form and content of the noise discussions that should be used in the next GEIR update or other reports relating to noise impacts at Hanscom field
7. A Report to Massport, the Hanscom aviation communities, participating organizations and the Massachusetts Secretary of Environmental Affairs summarizing the conclusions of the Workgroup.

## Workgroup Members

Michael Bahtiarian  
Town of Bedford Representative  
Member, Metrics and Modeling Taskgroup

Reinier Beeuwkes  
Town of Concord Representative,  
Workgroup Chairman  
Member, Abatement and Mitigation Taskgroup

Bill Brooks  
Minuteman National Historic Park Representative

Julian J. Bussgang  
Town of Lexington Representative  
Member, Metrics and Modeling Taskgroup

Bruce Campbell  
Town of Lincoln Representative  
Member, Metrics and Modeling Taskgroup

Donald L. Dawes  
Hanscom Field Advisory Commission (HFAC) Representative

1st Lt. David L. Englin  
Hanscom Air Force Base Representative  
Member, Abatement and Mitigation Taskgroup

Lt. Col. Donald A. Flowers  
Hanscom Air Force Base Representative  
Member, Abatement and Mitigation Taskgroup

Anthony G. Galaitsis  
Town of Lexington Representative  
Member, Metrics and Modeling Taskgroup

Janet M. Kennedy  
Hanscom Field Advisory Commission (HFAC) Representative  
Member, Abatement and Mitigation Taskgroup

Mark Myles  
Town of Concord representative  
Chairman, Metrics and Modeling Taskgroup

Jeffrey Parker  
Town of Bedford Representative  
Chairman, Abatement and Mitigation Taskgroup

Neil Rasmussen  
ShhAir Representative  
Member, Metrics and Modeling Taskgroup

Edward Rolfe  
Town of Lincoln Representative  
Member, Abatement and Mitigation Taskgroup  
Member, Metrics and Modeling Taskgroup

Dan Schrager  
Hanscom Airport Resource Team (HART) Representative  
Member, Abatement and Mitigation Taskgroup

Bradford L. von Weise  
Hanscom Airport Resource Team (HART) Representative  
Member, Abatement and Mitigation Taskgroup

John D. Williams  
ShhAir Representative  
Member, Abatement and Mitigation Taskgroup



## Workgroup Members

### Biographical Information

Michael Bahtiarian  
Town of Bedford Representative  
Member, Metrics and Modeling Taskgroup

B.S. Mechanical Engineering, Pennsylvania State University, 1985.  
M.S. Mechanical Engineering, Rensselaer Polytechnic Institute, 1988.

Mr. Bahtiarian has worked in the field of acoustical engineering and noise control during his 14 year career. He started at General Dynamics Electric Boat Division as a sound & vibration engineer on the SEAWOLF submarine design team. Mr. Bahtiarian is currently a Senior Engineer at the consulting firm of Noise Control Engineering in Billerica MA. The firm's activities include providing acoustical engineering expertise to industrial and government clients. He specializes in industrial noise control and field testing. Mr. Bahtiarian is a member of the Institute of Noise Control Engineers (INCE) and American Society of Mechanical Engineers (ASME). He has served on the board of directors of the Boston Chapter of the Institute of Environmental Science (IES) from 1990 through 1997 and as the President of the chapter in 1996-97. Mr. Bahtiarian's activities for the Town of Bedford include the Design Review Committee for the replacement Davis Elementary School. He also served as the co-chairman of the Noise Topic Review Committee (TRC) during the 1995 Hanscom GEIR submittal process. Mr. Bahtiarian's wife Florence, a Chelmsford Optometrist, and two daughters have lived in Bedford since 1996.

Reinier Beeuwkes  
Town of Concord Representative,  
Workgroup Chairperson/facilitator  
Member, Abatement and Mitigation Taskgroup

B.Sc. Massachusetts Institute of Technology  
Ph.D. Harvard University

Dr. Beeuwkes is a licensed pilot. His pre-revolutionary home in Concord is located less than 3 miles from the center of Hanscom Field. His scientific interest has been in instrumentation with emphasis on microanalytic methods. He served on the faculty at Harvard Medical school for 11 years, leaving to become Director of Cardiovascular and Renal Pharmacology at Smith Kline and French Laboratories. He was subsequently appointed Director of Strategic Planning for Smithkline Worldwide R&D. Since leaving Smithkline in 1987, he has divided his time between business, product development, and education. He is author or co-author of more than 80 scientific publications, five textbook chapters and six patents. Dr. Beeuwkes is a principal in several small companies, including Braintree Laboratories (pharmaceuticals) and Cybermedical Corporation (internet). He holds academic appointments at Harvard and the University of Pennsylvania and has been Chairman of the Council of the Harvard Graduate School Alumni Association.

Bill Brooks  
Minuteman National Historic Park Representative

Bill Brooks is a Park Ranger with the National Park Service. He has worked at Minuteman National Historical Park since 1994 in the division of Resource Management and Visitor Protection. His duties include the enforcement of Federal and State laws and regulations, providing emergency medical assistance, boundary management, coordinating the bike patrol program, and among other things, serves as the park Safety Officer. Prior to working for the National Park service Bill worked several years for a residential developer. Bill has represented Minuteman NHP to the local town governments on area development issues. He has a bachelor's degree in Urban Studies and Planning from the University of California.

Julian J. Bussgang  
Town of Lexington Representative  
Member, Metrics and Modeling Taskgroup

B.Sc. (Engineering), University of London, U.K.  
M.S.E.E., Massachusetts Institute of Technology  
Ph.D. in Applied Physics, Harvard University

Dr. Bussgang is an independent consultant. His training and professional specialty are statistical communication theory and signal processing to extract signals from noise. He was founder and president of Signatron, Inc., a defense electronics R&D company, located for many years on Hartwell Avenue in Lexington. He also served as technical consultant to many major corporations. Prior to founding Signatron, he worked at MIT Lincoln Laboratory, and at RCA in Burlington, MA, where he became Manager, Radar Development, and later, Manager, Applied Research.

He is Fellow of the Institute of Electrical and Electronic Engineers and former chairman of the Boston Section of the IEEE. He served on the Board of Governors of the IEEE Information Theory Group. He was Visiting Lecturer at Harvard and Northeastern Universities teaching graduate courses in Signal Detection and Estimation. He has many publications in the field. He served on the Board of Overseers of the Museum of Science in Boston.

Dr. Bussgang has lived in Lexington for 37 years. He served as an elected Town Meeting Member for a number of years and has been a volunteer member on various town committees, including the Noise Topic Review Committee that worked on the 1995 Hanscom GEIR.

Bruce Campbell  
Town of Lincoln Representative  
Member, Metrics and Modeling Taskgroup

B.S. (Physics) - Bucknell University  
Philosophy Grad Work - Bucknell University

Bruce Campbell lives in Lincoln Center, about 3 miles from Hanscom. His primary business interest is high-tech start-ups. He is currently President of a bio-tech company and a principal in a film special-effects software company. Prior to this, he ran his own consulting practice for five years, providing market planning services and business strategy for high-tech and start-up clients. His projects ranged from technology acquisition, to product line rationalization, to securing funding. Prior to that, he was Director of Marketing for FTP Software for four years, seeing the company from \$4 million to \$28 million in sales, and helping bring in outside ownership.

Donald L. Dawes  
Hanscom Field Advisory Commission (HFAC) Representative  
Hanscom Pilots Association

B.S.E.E. Northeastern University

Donald Dawes is an electrical engineer engaged in consulting. He is Principal in Quality Solutions, specializing in the improvement of manufacturing processes. He is a past Examiner for the Massachusetts Quality Award. He is a Registered Professional Engineer in the State of Massachusetts.

Mr. Dawes is a pilot with his own aircraft based at Hanscom Field. Since 1990 he has served as the representative of Hanscom Pilots Association, Inc. to the Hanscom Field Advisory Commission. Hanscom Pilots Association was formed in 1986 to unify the interests of pilots operating at Hanscom field and to demonstrate a sense of responsibility on the part of pilots to the community at large and the neighbors in particular.

David L. Englin  
Hanscom Air Force Base Representative  
Member, Abatement and Mitigation Taskgroup

B.S. U.S. Air Force Academy  
Masters in Public Policy, Kennedy School of Government, Harvard University.

First Lieutenant David L. Englin is Chief of Plans and Programs, Electronic Systems Center (ESC) Public Affairs Office, Hanscom Air Force Base, MA. He is responsible for all office strategic planning maintenance of office checklists and instructions. Additionally, he serves as a public affairs officer; routinely dealing with members of the community on matters of interest regarding Hanscom AFB. He also regularly develops and writes news releases and articles on the many people and programs of the base.

Donald A. Flowers  
Hanscom Air Force Base Representative  
Member, Abatement and Mitigation Taskgroup

B.S. (Management) University of Alabama  
M.S. (Human Resources) Abilene Christian University

Lieutenant Colonel Donald A. Flowers is Commander, 66 Logistics Squadron, Hanscom Air Force Base, MA. He is responsible for supply, transportation, munitions, and transient alert operations for the base, tenant organizations, and more than 200 other geographically separated units throughout the 7-state New England area.

Lt. Col. Flowers is originally from Homewood, Alabama, commissioned through Air Force ROTC from the University of Alabama in 1980, and subsequently attended undergraduate pilot training. Lt. Col. Flowers has held a variety of USAF and joint supply/fuel/logistics assignments covering retail to wholesale level operations. He was selected for an internship with the Department of Energy's Strategic Petroleum Reserve in 1986-1987. In August 1990, he deployed to Bahrain in support of DESERT SHIELD to establish and coordinate the initial theater petroleum support for all Services and Multi-National Forces. In May 1994, Lt. Col. Flowers became the first Commander, Defense Fuel Office Japan, to provide transportation and contracting support for inland petroleum distribution in Japan. He has experience in handling environmental issues with communities such as fuel spills and noise complaints (Col. Flowers has been recently transferred and is now Joint Staff Officer, U.S. Forces Korea. He was thus unable to participate in the final activities of the Workgroup.)

Bill Fuchs  
Minuteman National Historical Park Representative

Bill Fuchs is a Biologist with the National Park Service (NPS). He started working with the NPS in 1981, and has worked at nine NPS sites across the country. Bill has worked at Minuteman National Historical Park since 1997 in the division of Resource Management and Visitor Protection. His duties include the environmental and wetlands compliance; supervising inventory, monitoring, and research within the park; control of exotic species; park planning; and providing park management with the information and guidance required to effectively manage park natural resources. Bill regularly represents Minuteman NHP at meetings with other agencies and individuals including town governments, planners, developers, and park neighbors. He has bachelor's degrees in biology and geology, has done extensive graduate work geology, and is a graduate of the NPS Natural Resource Management Training Program.

Anthony G. Galaitsis  
Town of Lexington Representative  
Member, Metrics and Modeling Taskgroup

B.Sc. City College of the City University of New York  
Ph.D. Massachusetts Institute of Technology

Dr. Galaitsis received his Ph.D. in Physics from MIT for research he conducted in the area of Acoustics. He is currently a Division Scientist at BBN Technologies, where he has been performing R&D in Acoustics for over 25 years. He has directed or participated in programs focusing on the characterization of airborne, fluidborne and structureborne noise generation and propagation, and on the passive and active control of such noise. His work extends over both theoretical and experimental studies, including analysis and modeling of noise generating systems, design and manufacturing of noise control treatments, integration of treatments into prototype systems, and test and evaluation of such systems. He has conducted such studies on automobiles, trains, mining equipment, tracked vehicles, aircraft, ships, submarines, specialized machinery, and acoustic test facilities.

He has authored or co-authored more than 60 technical publications in the area of Noise and Vibration control. He is the author of the "Reactive Silencers" chapter of the Noise Control Engineering Applications book (edited by L. L. Beranek and I. L. Ver). He is a member of the Acoustical Society of America, Institute of the Noise Control Engineering, and American Association for the Advancement of Science.

A Lexington resident for more than 20 years, Dr. Galaitsis is a member of the Lexington Planning Board and also a member of the Lexington Town Meeting. He is also one of the contributors to the Four Town Topic Review Committee (TRC) report on Noise prepared in response to the 1995 Hanscom GEIR.

Janet M. Kennedy  
Hanscom Field Advisory Commission (HFAC) Representative  
Member, Abatement and Mitigation Taskgroup

A.A.S., B.S. Boston University

Ms. Kennedy has been a member of the Hanscom Field Advisory Commission for the past 5 years. During most of the Workgroup's life, she was Chair of the Commission. A resident of Bedford since 1982, Ms. Kennedy has been actively interested in developments at Hanscom Field and how they affect the communities. She has extensive experience in management, accounting and finance. Ms. Kennedy and her husband own Ultima, Ltd., an automotive business in Waltham, where she is CFO. She is also Controller of Boshco, Inc. in Billerica. She has been Treasurer of the League of Women Voters of Bedford since 1995. An avid skier, she also enjoys competing in offshore sailboat racing.

Mark Myles  
Town of Concord representative  
Chair, Metrics and Modeling Taskgroup

B.S. Cornell University  
M. Eng. (Electrical) Cornell University

Mr. Myles has been involved with measurement instrumentation in a career that spans more than 25 years. He was a consultant and researcher in acoustics and vibration with Bolt Beranek and Newman, Inc. (now BBN Technologies of GTE) for over 9 years. His work at BBN included aeronautical acoustics research for NASA, and transportation noise and vibration work for the US Department of Transportation, the New York City Transportation Authority, MBTA, and others. He also performed numerous environmental noise and psychoacoustic studies for various government agencies, transportation authorities including Massport, utilities, and industrial companies. In all this work, his primary areas of expertise were measurement instrumentation, transducers, and data analysis. He is the author of several scientific papers and technical reports on industrial noise dosimetry, the psychoacoustics of sirens and alarms, railroad noise generation, noise from electric utilities, and wind tunnel noise, among other topics.

In 1980, Mr. Myles joined Hewlett-Packard Company's Test and Measurement Organization as an Applications Engineer responsible for applications support of Fast Fourier Transform-based analyzers, laser interferometers, and data acquisition systems. Applications for these technologies include noise control engineering, general vibration measurement and control, Modal vibration analysis, automotive and aircraft engine test, and industrial vibration modeling and monitoring. Later, he became an Applications Engineering manager for a variety of measurement disciplines, then a Solutions Architect for internet-based measurement and control systems. Today, he has worldwide responsibility for developing technical training curriculums within HP Test and Measurement.

Mr. Myles is an avid whitewater kayaker and outdoor enthusiast, with a goal of eventually becoming a private pilot. He and his family live near the Sudbury River in the Conantum neighborhood of Concord.

Jeffrey Parker  
Town of Bedford Representative  
Chairperson, Abatement and Mitigation Taskgroup

B.A. Reed College  
Ph.D. Massachusetts Institute of Technology

Dr. Parker has lived in Bedford for the past fifteen years. He is a staff member at MIT Lincoln Laboratory specializing in infrared detectors with special interest in the infrared characteristics of the atmosphere. Dr. Parker is author or co-author of numerous scientific papers. He has been a licensed pilot for 24 years and holds a commercial, multi-engine, instrument rating. In addition to being an active general aviation pilot at Hanscom Field, Dr. Parker is a scientific crew member on MIT's Gulfstream II research aircraft. Dr. Parker is an active Bedford community member and has served on numerous town committees concerning Hanscom Field.

Neil Rasmussen  
ShhAir Representative  
Member, Metrics and Modeling Taskgroup

B.Sc. Massachusetts Institute of Technology  
M.S. Massachusetts Institute of Technology

Mr. Rasmussen is founder and Chief Technical Officer of American Conversion Corporation. His special technical interest is Human Factors Engineering. At M.I.T, he studied Auditory Neurophysiology and Psychoacoustics. After graduation from M.I.T. in 1979 he worked at MIT Lincoln Laboratories prior to founding APC in 1981. APC develops and manufactures AC power protection equipment for computer networks and now employs over 5,000 people worldwide. He regularly participates in public discussions regarding the future of Hanscom Field and is a founder of ShhAir.

Neil and his wife Anna are Trustees of The Neil and Anna Rasmussen Foundation which supports local preservation activities.

Edward Rolfe  
Town of Lincoln Representative  
Member, Abatement and Mitigation Taskgroup,  
Member, Metrics and Modeling Taskgroup,

B.Sc.(Eng.)(1<sup>st</sup> Class Hons), London University  
M.A. Theoretical Physics, Brandeis University  
S.M. (Chem. Eng.) Massachusetts Institute of Technology  
Harvard Business School, Marketing and Communications  
Chartered Engineer in the European Common Market

Edward Rolfe has lived in Lincoln for 40 years, and is a member of HFAC. He was apprenticed at the General Electric Company, and became a staff member in the Consulting and General Engineering Lab. During World War II, he was a Captain in the British Army Special Forces, Airborne Royal Electrical & Mechanical Engineers. He has held the positions of Technical Department Manager, Fawley Oil Refinery, Manager Advanced Development American Machine & Foundry Company, Principal Research Scientist AVCO Corp., Manager Plasma Physics Department at the Raytheon Company where he worked on long-range missile detection, re-entry communications, and laser development, and wrote a number of technical papers, Senior Titled Engineer at Stone & Webster Engineering Corp., and is now President of a startup company specializing in computer systems integration. He has 4 patents in electronic and chemical process controls, and was awarded a NASA Science Prize for laser measurement of turbulence in rocket motor flames.

Dan Schragger  
Hanscom Airport Resource Team (HART) Representative  
Member, Abatement and Mitigation Taskgroup

A.B. Harvard University

Mr. Schragger lives in Concord on Great Meadows, a mile from the runway end at Hanscom Field. He is an instrument rated pilot. He founded and runs the Aviation Insurance Agency and is Principal and cofounder of Aviation Capital Corporation; both located at Hanscom Field. He holds an FAA Aviation Safety Counselor designation and sponsors a variety of aviation safety seminars.

Prior to moving to the Boston Area, he attended the Juilliard School for piano studies. Mr. Schragger developed vocational training programs for several social service collaboratives.

Mr. Schragger has served as Scoutmaster in Concord and as a little league coach. He is an avid bicyclist, hiker and kayaker and remains active in various Chamber Music venues. Has lived in Concord since 1992 with his wife, a special needs teacher and his school age son.

Bradford L. von Weise  
Hanscom Airport Resource Team (HART) Representative  
Member, Abatement and Mitigation Taskgroup

B.A ( Environmental Studies) University of Vermont  
Certificate in Real Estate Studies, Boston University

Mr. von Weise is a licensed instrument rated pilot and owner of a Beechcraft A36 Bonanza aircraft, based at Hanscom Field. He is also the Airport Support Network Representative for Hanscom for the Aircraft Owners and Pilots Association (AOPA) and a member of the flight standards committee for Angel Flight Northeast. Professionally, Mr. von Weise is a partner at TarAir Corporation, a corporate aircraft sales and acquisition consulting firm based at Hanscom. He is also currently President of the real estate investment firms of Bredon Hill Investment Corporation and West Midlands, Inc. Additionally, Mr. von Weise is general partner of Whitewater Development Limited Partnership and Managing Director of 195 Corporation Way LLC, both real estate holding companies. Prior to his association with TarAir, he was a partner at Juniper Holdings, Inc., where he was the chief real estate investment officer of the firm. Mr. von Weise was also the senior associate of the real estate group at Boston Capital Partners, Inc. Prior to his involvement with Boston Capital, Mr. von Weise was the Vice President of Finance at American Realty and Financial, Inc. Mr. von Weise is a resident of Carlisle, where he lives with his wife and two daughters.



John D. Williams  
ShhAir Representative  
Member, Abatement and Mitigation Taskgroup

A.B. Creighton University  
Master Theological Studies, Weston Jesuit School of Theology  
Chartered Financial consultant, American College.

Founding partner Capital Formation Group Inc. (Financial Services ).  
Member Boston Estate Planning Council.  
Directs estate management and design for CFG.  
Serves as trustee for several charitable organizations.  
Author of training text on Charitable estate planning.  
Member Mass. Society of Insurance Advisors.  
member Board of Advisors of The National Heritage Foundation (a public  
Charity).  
Board of Directors, ShhAir, a nonprofit dedicated to safeguarding the  
environment of the Hanscom area.

PARTICIPATING AND OBSERVING ORGANIZATIONS:  
(alphabetically)

Hanscom Air Force Base

Military flying operations at Hanscom began in 1942, with fighter training activities. Since 1945, Hanscom has emerged as the Air Force's leading center for the development and acquisition of electronic systems. In 1952, the Commonwealth of Massachusetts transferred land on the East side of the airport to the Air Force as a permanent location for Hanscom Air Force Base. Presently, the Electronic Systems Center and adjacent university and commercial laboratories employ approximately 10,000 persons. Although no military aircraft are presently based at Hanscom, they are required to use the Field in support of ongoing research programs and medical and supply logistics. The base is home to the 66<sup>th</sup> Air Base Wing, which is responsible for supply, transportation, munitions, tenant operations, and for more than 200 other geographically separate units across New England.

HART (Hanscom Area Resource Team):

The Hanscom Area Resource Team ("HART") was founded in 1997 to enable the businesses and users of Hanscom Field to participate in the ongoing debate regarding the many issues surrounding Hanscom. Virtually all businesses located at Hanscom, together with their combined 260 employees are members. These businesses serve the general aviation community at Hanscom. The goal of HART is to maintain the current use of Hanscom field as a first-rate general airport that serves the diverse needs of general aviation activity, including private, business, corporate, training, charitable and emergency medical/search and rescue aviation. Additionally HART supports the concept of aviators as good citizens and neighbors and promotes the increased safety of operations to and from Hanscom through education and information. (HART text)

HFAC (Hanscom Field Advisory Commission):

The Hanscom Field Advisory Commission, established by act of the State legislature in 1980, includes 16 members appointed by the selectmen of the four towns surrounding the airport. Of these members, four are Town representatives, and two are appointed from each of the following categories (1) local citizens groups; (2) area wide organizations; (3) other area towns impacted by aviation at Hanscom Field; (4) businesses basing aircraft at Hanscom Field and (5) aviation or aviation related businesses at Hanscom field. In addition, there is one representative from a business - aviation organization and one from a general aviation organization both of whom shall be a regular user of or employee of a regular user of Hanscom Field. The Hanscom Field advisory commission has the following duties: (1) to act as an advisory commission for review and reaction with regard to decisions relating to Hanscom Field and the Hanscom Field area, including but not limited to, land-use, noise abatement and transportation needs as outlined in the Hanscom Field master plan; (2) to provide continued communication between the communities surrounding Hanscom Field and the Massachusetts Port Authority; and (3) to establish an executive committee of members within the commission. (HFAC Text)  
The Commission meets monthly.

HMMH (Harris, Miller, Miller, Hanson):

Harris Miller Miller & Hanson Inc. was formed in 1981 to provide quality consulting services on issues of aviation noise. The firm's founders, Andrew Harris, Robert Miller, and Nicholas Miller, worked together on airport noise problems for 10 years at Bolt Beranek and Newman Inc. (BBN), before starting the new company. They were joined a year later by another BBN colleague, Carl Hanson, who with other staff, added expertise in the noise problems of rail systems and highways.

Today HMMH has more than 60 employees and is known and respected internationally for its work in all three transportation modes, though aviation issues account for approximately three quarters of the company's business interests. The firm's senior staff has in excess of 300 years combined experience in noise assessment and control at about 150 commercial, general aviation, and military airfields throughout the U.S. and in Canada, Australia, Italy, Japan, Taiwan, Spain, Hong Kong, Puerto Rico, and Guam. As an extension of its consulting business, HMMH also installs and maintains about 30 monitoring systems at major U.S. airports such as O'Hare, Miami, Denver, San Diego, and Minneapolis and at other airports in Canada, the United Kingdom, Poland, and Italy. In addition, HMMH provides several full-time staff to support the airport noise office on-site at San Francisco International and has done so for Chicago's O'Hare and Midway Airports as well. At the federal level, the firm's aviation clients include the FAA, the U.S. Air Force, the U.S. Navy, NASA, and the National Park Service.

HMMH has been working on noise issues for Massport since its founding and during that time has provided support on some 25 to 30 projects both at Logan and at Hanscom. The company's main offices are located in Burlington, Massachusetts, and it operates a branch office in Sacramento and a branch in the U.K. (HMMH Text)

MASSPORT (Massachusetts Port Authority):

The Massachusetts Port Authority (Massport), enabled by the Massachusetts legislature in 1959, is a world-class independent public authority which develops, promotes and manages airports, the seaport and transportation infrastructure to enable Massachusetts and New England to compete successfully in the global marketplace. An economic engine for the region and an international gateway to New England, Massport is a responsible corporate citizen committed to its employees, customers and the public interest.

Massport's importance to the region is reflected by its economic impact. Although 1200 people work directly for Massport, another 20,000 jobs are generated by its operations and activities. Massport facilities and operations contribute more than \$5 billion to the state's economy annually. In addition, because Massport is an independent bond authority, it does not rely on or receive any state tax monies to carry out its critical mission. (Massport web site Text)

Massport operates Logan International Airport in Boston, and Lawrence G. Hanscom Field 18 miles to the west of Boston. Massport and the City of Worcester recently signed a Memorandum of Understanding that is expected to result in Massport's operation of Worcester Regional Airport.

## MMNHP (Minuteman National Historical Park):

Minuteman NHP was created by an act of Congress in September of 1959 *"in order to preserve for the benefit of the American people certain historic structures and properties of outstanding national significance associated with the opening of the War of the American Revolution.."*. The boundary of the National Historical Park encompasses land on either side of the "battle road," between Rt. 128 in Lexington and Old Bedford Rd. in Concord as well as a parcel around the historic Wayside house and the Old North Bridge in Concord. Minuteman shares a boundary with Mass Port along its northern edge. The boundary of the park comes to within a few hundred feet of Hanscom Field. The historic battle road is less than half a mile away from one of the runways. The number of people who come to visit the first battle field of the American Revolution each year has been counted at over one million. For the many millions that will visit in the future Congress has charged Minuteman NHP with the following: *"The purpose of the park shall include the preservation and interpretation of the historic landscape along the road between Lexington and Concord, sites associated with the causes and consequences of the American Revolution..."* (MMNHP Text)

## ShhAir (Safeguarding the historic Hanscom Area's Irreplacable Resources):

ShhAir was founded in February, 1997 by a group of concerned citizens from the four towns in which Hanscom field is located -- Bedford, Concord, Lexington and Lincoln. Since then, more than 1500 residents have become members. Incorporated as a nonprofit organization, ShhAir's purpose is "to safeguard the historic Hanscom area communities -- the birthplace of our nation -- from the increased noise, ground traffic, and environmental pollution that would result from the expansion of the air traffic at Hanscom field or changes in the character and use of the airport." (ShhAir Text)

## Town of Bedford:

The Town of Bedford was incorporated in 1729. Located 14 miles northwest of Boston, Bedford is situated between Concord and Lexington, towns readily identified with the American revolution. Bedford has a proud history as well. Its town flag, carried by the Bedford Minuteman Company at the Battle of the Old North Bridge on the morning of April 19, 1775, is the oldest flag in existence to fly over American fighting men.

Within Bedford's 14 square miles live about 14,000 people from all walks of life. Most of the land is wooded, and the Town retains much of its old rural atmosphere. Visitors are still welcome at the Job Lane house, built before 1720. The Bedford Veteran's Administration Hospital has open grounds that host Summer fireworks and Native American gatherings.

Industrial companies within the Town contribute significantly to advances in high technology and our nation's military preparedness. This role is enhanced due to the proximity of the U.S. Air Force Electronic Systems Center at Hanscom Air Force base. Bedford is generally known as the home of L.G. Hanscom Field, since approximately half of the field lies within the town's boundaries. .

## Town of Concord:

The Town of Concord was founded in 1635, as the first inland colony of the Province of Massachusetts Bay. Now a town of nearly 16,000 people, it is still governed by an open Town Meeting. Within Concord's 26 square mile area are many historic sites, including several of national significance. The fact that about 45 percent of the land is protected wetland or conservation land indicates the high level of environmental concern shown by the town's citizens

. This protected land includes a major portion of the Great Meadows National Wildlife Refuge, and Estabrook Woods, a research preserve owned by Harvard University. Walden Pond, the site of Henry David Thoreau's cabin and now a State Park, is a pilgrimage site for visitors from around the world. The Headquarters of Minuteman National Historical Park is located in Concord. This Park, with its memories of Paul Revere and its Old North Bridge, is a patriotic destination for a million Americans every year. The homes of Ralph Waldo Emerson, Louisa May Alcott and Nathaniel Hawthorne, now museums, attract visitors of literary bent.

Yet Concord is also a vibrant modern community. Its schools are among the best in the state, its software and internet industry includes leaders in the field, and its real estate values are rising steadily. Concord is also one of the border towns of L.G. Hanscom Field. Indeed, the Old North Bridge lies directly under the approach end of runway 11, and thus the departure end of runway 29. Operations at the airport, both civilian and military, thus have a great potential impact on the Town, its tourist attractions, and its permanent residents. The Town participates actively in committees and advisory boards relating to the airfield, and one of its citizens presently serves a chairman of the Hanscom Field Advisory Commission.

## Town of Lexington:

Lexington is a residential town located in Middlesex County, 11 miles northwest of Boston, 18 miles south of Lowell. The major access roads are Routes 2 and 128. The 1998 census listed the population at 31,913. The area of the town is 16.6 square miles (10,650 acres). Neighboring towns are Lincoln, Bedford, Concord, Woburn, Winchester, Arlington, Belmont and Waltham. The town is governed by a Board of five selectmen and administered by a Town Manager. Budgets are approved by an elected Town Meeting.

Originally settled about 1640 as part of Cambridge, Lexington was incorporated as a separate town in 1713. Early settlers were farmers and workers. The town prides itself on having a balanced population of both low and higher incomes, and of diverse national origins. Housing prices span a range from expensive to moderate. The town has numerous parks, conservation lands, museums and libraries. Purchases of open and wooded land areas have helped preserve the area.

The American Revolution began here. The town's Battle Green is the site where events of that day are commemorated on Patriot's Day. More than 100,000 tourists come every year to view historic sites. Buildings on a typical tour include Buckman Tavern, where Minutemen assembled; Munroe Tavern, British headquarters during the battle; Belfry Tower, where the alarm was sounded; Hancock-Clarke House, where Samuel Adams and John Hancock heard the alarm sounded by Paul Revere; and Museum of Our National Heritage.

Though close to Boston, the town is quiet, historic and maintains open spaces for recreation, farming and wetland preservation. Nature trails, golfing, tennis, swimming, ice skating, cross-country skiing, and sledding are some of the activities accessible to the residents. Recently, a Bicycle Path was added. Residents take special pride in supporting an excellent school system, augmented by the Minuteman Regional Vocational Technical High School (9-12), shared with other communities in the Greater Boston area.

Lexington pays much attention to municipal planning, and selected areas near the highway are designated for offices and light industry. Lexington's industrial community includes the headquarters of Raytheon and StrideRite, the MIT Lincoln Laboratory, as well as young high tech companies.

A portion of the Hanscom Air Force Base and of Hanscom Field are located within the town. Lexington has always supported both establishments, on the premise that Hanscom Field will be used by the military for national needs and by local pilots and businesses, and not as a regional transportation center.

## Town of Lincoln:

Lincoln is a residential community, population 5,300, situated about 15 miles west of Boston, adjacent to Hanscom Field in the north, Lexington to the East, and Concord to the West. With an area of approximately 14.5 square miles it has retained a considerable amount of its land for conservation, wetland preservation, and recreation, through the strenuous and generous efforts of its residents who cherish its rural, agricultural character and its historical legacy.

Lincoln was incorporated as a town in 1754, and at that time was principally an agricultural community, with some small mills. Through gradual suburbanization it has become an affluent residential community yet one revered for its dedication to preserve open space, and for its creative planning for land-use management.

Within the town are Drumlin Farm, home to the Massachusetts Audubon Society, The Thoreau Institute, portions of Walden Pond, the DeCordova Museum and Sculpture Park, the Codman House, the Pierce House and Park, the Minuteman Regional High School, and a large portion of the Battle Road with many important historical sites that comprise MinuteMan National Historical Park. Together with the extensive hiking, biking and recreational trails throughout the town, these attract and are enjoyed by thousands of visitors year round.

Industrial development, drastically increased volume and speed of automobile traffic, all challenge the character and pace of the town. The location of a popular and important national park, attracting over 1 million visitors a year, brings more traffic than can be accommodated. Hanscom Field, the Route 128 businesses, and easy access to Greater Boston contribute weekday commuter problems on all main roads in town. Pollution and Aircraft noise have become significant issues to the region. Representatives of Lincoln are devoting considerable time and effort working to mitigate these problems on a collaborative, regional basis.

## Workgroup Meetings

(Entire Group)

Date:	Activity/presentations:
April 28, 1998	Organizational
May 26, 1998	Choose Chair Mission Statement Operating Procedures
June 22, 1998	Adopt Mission/Procedures Form Taskgroups FICAN and Research background M. E. Eagan- HMMH
July 28, 1998	Taskgroup reports Review Hanscom operations Civilian- B. Patzner S. Arnold/Massport Military Lt. Col. Flowers/ USAF
September 22, 1998	Taskgroup Reports
October 27, 1998	Taskgroup Reports Abatement efforts elsewhere R. Miller/HMMH
December 8, 1998	Metrics Taskgroup Draft Report Abatement Taskgroup Draft report
April 6, 1999	Abatement presentation and adoption
September 9, 1999	Metrics Draft presentation and adoption
September 22, 1999	Final report adoption and signature



## Taskgroup Meetings

### Abatement and Mitigation

Date:	Activity/Presentation:
July 7, 1998	Elect Chair Adopt goals Civilian operations and flight patterns Ken MacDonald/ HART Military operations and procedures Captain Wilson, USAF
August 5, 1998	MedFlight presentation Tim Harrison, Dan Thomas Mercury Air Service presentation John Wraga Jet Aviation presentation Chris Wheeler AOPA "Fly Friendly" Presentation Ford von Wiese
September 8, 1998	Possible recommendations
October 13, 1998	FAA positions, Part 150 John Silva/FAA Control Tower operations Jim Merageas/ FAA
November 10, 1998	Revised recommendations
December 15, 1998	Votes on initial list
January 12, 1999	Votes on second list
April 6, 1999	Workgroup presentation, amendment and Adoption
May 27, 1999	Voluntary abatement procedures subgroup
July 9, 1999	Voluntary abatement procedures review

## Taskgroup Meetings

## Metrics and Modeling

Date:	Activity/ presentation:
July 14, 1998	Elect Chair Adopt goals Review Ldn, other metrics Complaints Monitoring sites/ data
August 6, 1998	Flight track and noise modeling (meeting at HMMH)
September 10, 1998	Integrated Noise Model Massport monitoring capability
October 15, 1998	“Good Metric” criteria “Time Above” metric
November 3, 1998	Initial recommendations
November 24, 1998	Initial recommendations
January 24, 1999	Preparation of Draft
April 8, 1999	Review of Draft Recommendations
June 22, 1999	Revision of Draft
July 21, 1999	Revision of Draft
August 5, 1999	Revision of Draft

# ABATEMENT AND MITIGATION

## INTRODUCTION

The Abatement and Mitigation Taskgroup was formed in June 1998 as a sub-group of the Hanscom field Noise Workgroup to investigate topics related to the abatement and mitigation of aircraft noise on the surrounding communities. The Taskgroup met nine times between July '98 and February '99. The following people participated:

Sara Arnold (MASSPORT)  
Rein Beeuwkes (Concord)  
Julian Bussgang (Lexington)  
Don Dawes (HFAC)  
Lt. David Englin (USAF)  
Tom Ennis (MASSPORT)  
Lt. Col. Don Flowers (USAF)  
Barbara Forster (MinuteMan Paper)  
Tory Galaitsis (Lexington)  
Paul Gamache (Mercury Air Center)  
Mike Goulian (Executive Flight School)  
Mark Hanson (citizen)  
Tim Harrison (Boston MedFlight)  
Janet Kennedy (HFAC)  
Ken MacDonald (HART)  
Jim Merageas (Hanscom Operations)  
Rol Murrow (AOPA)  
Mark Myles (Concord)  
Jeffrey Parker (Bedford)  
Barbara Patzner (MASSPORT)  
Ed Rolfe (Lincoln)  
Dan Schrager (HART)  
John Silva, (FAA)  
Daniel Thomas (Boston MedFlight)  
Ford von Weise (HART)  
Richard Walsh (MASSPORT)  
Chris Wheeler (Jet Aviation)  
John Williams (ShhAir)  
Capt. Wilson (USAF)  
John Wraga (Mercury Air Center)

The mission adopted by the Taskgroup was to consider methods and procedures which:

- 1) may reduce the amount of aircraft noise generated by operations at Hanscom (abatement) and,
- 2) may reduce the impact of such noise on the surrounding communities (mitigation).

The Taskgroup began its investigation with presentations on aircraft operation at Hanscom Field. Ken MacDonald reviewed the air traffic patterns and described the differences between operations under visual flight rules (VFR) and instrument flight rules (IFR). Captain Wilson of the USAF followed with a review of military operations at the field. The Taskgroup concluded that there may be many ways for pilots to voluntarily modify their flight pattern, altitude, or power setting which could reduce the amount of noise generated by airplanes and that emphasis should be placed on pilot education.

Ford von Weise described the AOPA Fly Friendly Program. This program is written for pilots, addresses aircraft noise issues, and suggests procedures for pilots to follow which might reduce aircraft noise. The Taskgroup felt that the AOPA Fly Friendly Program and its recommendations provide an excellent starting point for educating pilots concerning noise issues.

Sarah Arnold addressed the question of aircraft operations at Hanscom Field and the number of complaints generated. Data grouped by time of day and type of aircraft were presented and the topic was discussed at length. Education of both pilots and of surrounding community members surfaced as a meaningful way to reduce the number of disturbances and complaints.

Following these presentations, the efforts of the Taskgroup turned to an investigation of the use of Hanscom Field. Representatives from three major users, John Wraga from Mercury Air Center, Chris Wheeler from Jet Aviation, and Tim Harrison from Boston MedFlight, described their respective operations. Mr. Wraga and Mr. Wheeler indicated that they would be happy to provide space in their pilot lounges for a noise abatement display. All three presenters expressed an interest in working with the Hanscom communities concerning the noise issue. Discussions were also conducted with the local flight schools.

During these investigations, John Silva from the FAA Airport Division described the FAA's role in noise abatement issues and addressed the FAA's stand on a number of noise related topics. The topics of a Part 150 study and Hanscom's night operation fees were discussed at length. Mr. Jim Meragas (Hanscom Control Tower manager) joined this discussion and described the Control Tower's role at Hanscom. Mr. Meragas stated that he would be happy to review any and all Workgroup ideas/proposals.

After gathering extensive data and carefully reviewing each topic, the Taskgroup formed the 21 recommendations presented below. Certain complex and important issues (such as Part 150 related activities and the related nighttime use fee) could not be adequately dealt with given the time and staff available.

The Taskgroup is pleased to report that it worked extremely successfully with Massport, business, AOPA, and town representatives and believes that a cooperative and productive atmosphere was established between all parties. The Taskgroup believes that adoption of its recommendations will result in significant abatement and mitigation of aircraft noise, with benefit to the entire Hanscom community, the surrounding towns and the airport.

## **LIST OF ABATEMENT & MITIGATION RECOMMENDATIONS**

- A1. The Workgroup recommends that a set of voluntary noise abatement procedures be formulated for use at Hanscom Field.
- A2. The Workgroup recommends that Massport duplicate the voluntary noise abatement procedures in sufficient quantities so that each flight school can distribute the procedures to all aircraft renters.
- A3. The Workgroup recommends that Massport print and distribute informative page markers for Jeppesen and Flightguide handbooks and distribute to local and transient pilots.
- A4. The Workgroup recommends that Hanscom flight schools display local noise abatement procedures and information in their flight planning room and should distribute noise abatement information to their pilots. Local noise abatement procedures and the AOPA Fly Friendly program should be briefed to all flight instructors at least annually, and students should be required to view the AOPA Fly Friendly video at some time during their training.
- A5. The Workgroup recommends that the Hanscom AFB Flight Training Center (a.k.a. Hanscom AFB Aero Club) display local noise abatement procedures and information in its flight planning room and should distribute noise abatement flyers to its members. Local noise abatement procedures and the AOPA Fly Friendly program should be briefed at Flight Training Center safety meetings at least annually. New club members should be required to view the AOPA Fly Friendly video.
- A6. The Workgroup recommends that each FBO institute a guest sign-in sheet and follow up with a letter to each transient pilot describing the voluntary noise abatement procedures at Hanscom.
- A7. The Workgroup recommends that Massport expand their public access web site to include the voluntary noise abatement procedures for Hanscom Field.
- A8. The Workgroup recommends that a reminder that voluntary noise abatement procedures are in effect be include in the ATIS (Automated Terminal Information System) broadcast. Whenever workload permits, this information should be followed with reminders from the Tower, Ground and/or Clearance Delivery.
- A9. The Workgroup recommends that Hanscom AFB representatives to the Hanscom Noise Workgroup brief Electronic Systems Center and 66th Air Base Wing leaders on local noise abatement procedures, sensitivities, and issues. The audience for such a briefing should include program directors, who coordinate flight test support for their programs. The briefing content should highlight the need to consider noise abatement issues and possible alternate locations when coordinating flight test support.
- A10. The Workgroup recommends that the Hanscom AFB Transient Alert display and distribute local noise abatement procedures and information to military flight crews using their facility.
- A11. The Workgroup recommends that the Electronic Systems Center create a local noise abatement procedures web page that is easily accessible from both public access and restricted access web sites. This page should be mutually linked to Massport and Hanscom Field web sites. It should also be linked to web-based pre-flight planning resources used by both military and civilian pilots.
- A12. The Workgroup recommends that the Electronic Systems Center Office of Public Affairs send Hanscom area local newspapers regular (biweekly or monthly) news releases updating area residents on Air Force flight operations, subject to security considerations.

- A13. The Workgroup recommends that the Electronic Systems Center Office of Public Affairs add information about Air Force flight operations to the public access section of the Hanscom AFB web site, subject to security considerations.
- A14. The Workgroup recommends that Massport purchase and distribute the AOPA Fly Friendly video to all Hanscom pilots.
- A15. The Workgroup recommends that Massport provide support to ensure that a representative user group be available to all users, pilots and businesses.
- A16. The Workgroup recommends that members of the Hanscom Noise Workgroup brief Town Selectmen on the group's findings. This briefing should include a description of recent efforts to mitigate the effects of noise on surrounding communities as well as an explanation of the local noise abatement procedures. The audience should include both selectmen and all interested townspeople.
- A17. The Workgroup recommends that a group representing local pilots, business interests, surrounding communities and Massport be formed to investigate the possibility and implications of reopening the Part 150 study at Hanscom Field.
- A18. The Workgroup recommends that a group representing surrounding communities, local pilots, business interests, and Massport be formed to define the scope and purpose of a Model Quiet Airport Study at Hanscom Field.
- A19. The Workgroup recommends that a group representing local pilots, business interests, surrounding communities and Massport be formed to explore the idea of establishing a non-profit organization to raise funds to support various noise reduction and awareness programs.
- A20. The Workgroup recommends that a group representing local pilots, business interests, surrounding communities and Massport be formed to explore the idea of establishing a Noise Abatement Officer position at Hanscom Field.
- A21. The Workgroup recommends that a group be formed, including representatives of the Planning Boards from the towns of Lincoln, Lexington, Bedford and Concord, to study the issues associated with the creation of Noise Overlay Zoning Districts.

# **ABATEMENT & MITIGATION DETAILED RECOMMENDATIONS**

## **RECOMMENDATION A1: VOLUNTARY NOISE ABATEMENT PROCEDURES**

The Workgroup recommends that a set of voluntary noise abatement procedures be formulated for use at Hanscom Field.

### Time Frame

Immediate. (A draft completed August 1999. See appendix 1.)

### Background

In the past, Massport, HART and HPA have drafted a set of noise abatement procedures for Hanscom Field. The Workgroup recommends that these procedures be immediately formalized and published. Compliance with all procedures will be voluntary, consistent with aircraft and airport safety. The noise abatement procedures should be reviewed annually by a group representing local pilots, FBO's, flight schools, business interests, surrounding communities and airport operations and revised as necessary. The Workgroup recommends that, once these procedures are formalized, Massport print and distribute copies of the procedures to all airport users. Sufficient copies should be made for each flight school so that they can be distributed to local pilots. In addition, Massport should post a copy of the procedures to all Hanscom-based pilots. The committee recommends that large, poster size copies of the procedures be displayed at each flight school, in each FBO's pilot lounge, on the ground floor of the civil air terminal, in the control tower and wherever else deemed useful. In addition, the procedures should be included on the Hanscom web page.

### Expected benefits

Formalizing the noise abatement procedures for use at Hanscom Field will provide useful guidance to pilots and help them abate the effect of noise on the surrounding communities. Distributing and displaying these procedures is the first step in educating all airport users concerning the noise issues.

### Potential Adverse Effects

None

### Resources required

Volunteer hours necessary to formulate the noise abatement procedures. Massport man-hours and cost to print, duplicate, distribute and display the procedures.

## **RECOMMENDATION A2: DISTRIBUTION TO RENTERS**

The Workgroup recommends that Massport duplicate the voluntary noise abatement procedures in sufficient quantities so that each flight school can distribute the procedures to all aircraft renters.

### Time Frame

Immediate

### Background

Renters of aircraft at Hanscom Field may not be aware of the recent efforts to mitigate the effect of noise on the surrounding communities. The Workgroup recommends that an information sheet with the voluntary noise abatement procedures be reproduced by Massport in sufficient quantity so that each flight school can distribute the procedures to all aircraft renters. The flight schools should encourage renters to follow the voluntary procedures whenever possible.

### Expected benefits

Education of pilots will increase the use of recommended noise abatement procedures and mitigate the effects of noise on the surrounding communities.

### Potential Adverse Effects

None

### Resources required

Man-hours and expense necessary to duplicate and distribute the information sheet to all flight schools.



### **RECOMMENDATION A3: INFORMATIVE PAGE MARKERS**

The Workgroup recommends that Massport print and distribute informative page markers for Jeppesen and Flightguide handbooks and distribute to local and transient pilots.

#### Time Frame

Immediate

#### Background

Pilots own and refer to approach plates and airport facility information in popular handbooks. They often place plastic or cardboard markers in the books to help turn quickly to destination airports. Such place markers are used by many airports to communicate local procedures and noise abatement information. Such markers are not available for Hanscom.

#### Expected Benefits

Immediate exposure to noise abatement reminders during the flight planning phase (placing markers) and nearing the airport (approach plates or airport diagrams) is likely to increase use of noise abatement procedures.

#### Potential Adverse Effects

None

#### Resources required

Printing and die-cutting costs. Free distribution via FBO's , or inclusion in other mailings.

#### **RECOMMENDATION A4: FLIGHT SCHOOL BRIEFINGS**

The Workgroup recommends that Hanscom flight schools display local noise abatement procedures and information in their flight planning room and should distribute noise abatement information to their pilots. Local noise abatement procedures and the AOPA Fly Friendly program should be briefed to all flight instructors at least annually, and students should be required to view the AOPA Fly Friendly video at some time during their training.

##### Time Frame

Immediate

##### Background

Hanscom flight schools are important and influential member of the Hanscom flying community. They provide means for effective communication of procedures and responsibilities to pilots.

##### Expected benefits

Education of pilots will increase the use of recommended noise abatement procedures and mitigate the effects of noise on the surrounding communities.

##### Potential Adverse Effects

None

##### Resources required

Approximately 15 man-hours per year to post and maintain noise abatement display, distribute information, and brief members.

## **RECOMMENDATION A5: FLIGHT TRAINING CENTER BRIEFINGS**

The Workgroup recommends that the Hanscom AFB Flight Training Center (a.k.a. Hanscom AFB Aero Club) display local noise abatement procedures and information in its flight planning room and should distribute noise abatement flyers to its members. Local noise abatement procedures and the AOPA Fly Friendly program should be briefed at Flight Training Center safety meetings at least annually. New club members should be required to view the AOPA Fly Friendly video.

### Time Frame

Immediate

### Background

The Hanscom AFB Aero Club is an important and influential member of the Hanscom flying community. It provides a flight planning room and requires its members to attend regular briefings. These provide potential means for effective communication of procedures and responsibilities to both members and other pilots.

### Expected benefits

Education of pilots will increase the use of recommended noise abatement procedures and mitigate the effects of noise on the surrounding communities.

### Potential Adverse Effects

None

### Resources required

Cost of reproducing noise abatement flyers. Approximately 15 man hours per year to post and maintain noise abatement display, distribute flyers, and brief members.

## **RECOMMENDATION A6: FBO GUEST FOLLOWUP**

The Workgroup recommends that each FBO institute a guest sign-in sheet and follow up with a letter to each transient pilot describing the voluntary noise abatement procedures at Hanscom.

### Time Frame

Immediate

### Background

Many of the transient pilots may not be aware of the recent efforts to mitigate the effect of noise on the surrounding communities. The Workgroup recommends that each FBO institute a guest sign-in sheet and follow up with letters to transient pilots explaining the voluntary noise abatement procedures at Hanscom, and encouraging them to follow the procedures whenever possible.

### Expected benefits

Education of transient pilots will increase the use of recommended noise abatement procedures and mitigate the effects of noise on the surrounding communities.

### Potential Adverse Effects

None

### Resources required

Preliminary discussions with each FBO has taken place. Each FBO has expressed their support. The required resources are the man-hours and postage necessary to send a letter to all transient pilots.

## **RECOMMENDATION A7: MASSPORT WEB SITE**

The Workgroup recommends that Massport expand their public access web site to include the voluntary noise abatement procedures for Hanscom Field.

### Time Frame

Immediate

### Background

The Internet has become a major pathway for communicating information. A public-access web site allows the release of information to occur in a timely manner. Postings should include information about unusual operations and activities as well as local noise abatement procedures. This web site should be mutually linked to the USAF and other web-based pre-flight planning resources used by both military and civilian pilots.

### Expected benefits

Education of both area residents and pilots will help in working towards the common goal of mitigating the effects of noise on the surrounding communities.

### Potential Adverse Effects

None

### Resources required

Man-hours necessary to maintain the web site.

## **RECOMMENDATION A8: ATIS BROADCAST**

The Workgroup recommends that a reminder that voluntary noise abatement procedures are in effect be included in the ATIS (Automated Terminal information System) broadcast. Whenever workload permits, this information should be followed with reminders from the Tower, Ground and/or Clearance Delivery.

### Time Frame

Immediate

### Background

At many airports nationwide, noise abatement reminders are included in the ATIS broadcast. Such information is not regularly provided in the Hanscom ATIS broadcast or via Ground, Tower or Clearance Delivery communications.

### Expected benefits

The ATIS broadcast normally is the first information concerning current airport conditions and operations that arriving or departing aircraft hear. Including in this broadcast a reminder that voluntary noise abatement procedures are in effect will allow pilots time to plan and, if possible, to modify their flight profiles to mitigate the impact of noise.

### Potential Adverse Effects

None

### Resources required

FAA, Massport and the Tower Operations need to amend their protocol to include the recommended noise abatement reminders in the ATIS and other communications.

## **RECOMMENDATION A9: HANSCOM AFB LEADER BRIEFINGS**

The Workgroup recommends that Hanscom AFB representatives to the Hanscom Noise Workgroup brief Electronic Systems Center (ESC) and 66th Air Base Wing (66 ABW) leaders on local noise abatement procedures, sensitivities, and issues. The audience for such a briefing should include program directors, who coordinate flight test support for their programs. The briefing content should highlight the need to consider noise abatement issues and possible alternate locations when coordinating flight test support.

### Time Frame

Immediate

### Background

ESC and 66 ABW leaders and program directors, who may request or coordinate flight tests at Hanscom, have not ordinarily been included in informative programs relating to the potential noise impact of such operations or tests.

### Expected benefits

Education of ESC and 66 ABW leaders and program directors will increase the use of recommended noise abatement procedures and mitigate the effects of noise on the surrounding communities.

### Potential Adverse Effects

None

### Resources required

Approximately 10 man hours to develop and deliver briefing. Approximately 5 man hours per year to maintain briefing and to deliver it annually.

## **RECOMMENDATION A10: MILITARY FLIGHT CREWS**

The Workgroup recommends that Hanscom AFB Transient Alert display and distribute local noise abatement procedures and information to military flight crews using their facility.

### Time Frame

Immediate

### Background

Local noise abatement procedures have not been readily available to military flight crews in the past due to the absence of displaying such information in Transient Alert. The increasing attention towards aircraft noise warrants military pilot awareness of local community sensitivities.

### Expected benefits

Educating military pilots on recommended noise abatement procedures will alert them to community interest regarding aircraft noise and assist in minimizing such noise activity.

### Potential Adverse Effects

None

### Resources Required

Cost of reproducing noise abatement information.



## **RECOMMENDATION A11: ESC WEB PAGE**

The Workgroup recommends that the Electronic Systems Center create a local noise abatement procedures web page that is easily accessible from both public access and restricted access web sites. This page should be mutually linked to the Massport and Hanscom Field web sites. It should also be linked to web-based pre-flight planning resources used by both military and civilian pilots.

### Time Frame

Immediate

### Background

The web is becoming a very important planning resource for both military and civilian pilots associated with the Electronic Systems Center. It is also an important resource for members of the public seeking information about efforts to reduce environmental impacts.

### Expected benefits

Education of pilots will increase the use of recommended noise abatement procedures and mitigate the effects of noise on the surrounding communities. Area residents are more likely to tolerate Air Force-generated noise if they understand that the Air Force is attempting to mitigate noise by using noise abatement procedures.

### Potential Adverse Effects

None

### Resources required

Approximately five man hours to create the web page and to comprehensively link it to other web based flight planning tools.

## **RECOMMENDATION A12: ESC PRESS RELEASES**

The Workgroup recommends that the Electronic Systems Center Office of Public Affairs send Hanscom area local newspapers regular (biweekly or monthly) news releases updating area residents on Air Force flight operations, subject to security considerations.

### Time Frame

Immediate

### Background

The Electronic Systems Center Office of Public Affairs should send Hanscom area local newspapers regular (biweekly or monthly) news releases updating area residents on Air Force flight operations. Security considerations permitting, these news releases should include information about upcoming operations. When security considerations or scheduling issues preclude releasing information prior to an operation, information should be released after the operation has occurred, provided this would not endanger the security of future operations.

### Expected benefits

Area residents are more likely to tolerate Air Force-generated noise if they understand why particular operations are necessary. News releases that include reasons for particular flight operations would be more useful than simply releasing flight schedules.

### Potential Adverse Effects

None

### Resources required

Approximately 3 man hours per month to write information.

### **RECOMMENDATION A13: ESC WEB SITE NEWS RELEASES**

The Workgroup recommends that the Electronic Systems Center Office of Public Affairs add information about Air Force flight operations to the public access section of the Hanscom AFB web site, subject to security considerations.

#### Time Frame

Immediate

#### Background

The Air Force currently maintains a web site for Hanscom. The public access section does not include information about Air Force flight operations. Public access to operational information through this site will not compromise security since information posted to the Hanscom AFB web site would be subject to the same security and content considerations as news release information. This section of the Hanscom AFB web site should be mutually linked to MASSPORT and Hanscom Field web sites.

#### Expected benefits

This would allow the release of information to occur in a more timely and accessible manner than would be possible using only biweekly or monthly news releases.

#### Potential Adverse Effects

None

#### Resources required

Approximately 3 man hours per month to write and maintain information.

## **RECOMMENDATION A14: AOPA VIDEO DISTRIBUTION**

The Workgroup recommends that Massport purchase and distribute the AOPA Fly Friendly video to all Hanscom pilots.

### Time Frame

Immediate

### Background

The AOPA has produced a video to help educate pilots on the issues of noise and noise abatement. Many of the local aircraft owners and pilots may not be aware of this video. Although the Workgroup does not formally endorse the AOPA Fly Friendly video, we recommend that Massport purchase and distribute the video to all Hanscom pilots. A letter of introduction (see appendix) should be included with the video explaining to pilots the role that they can play in mitigation the effects of noise on the communities surrounding the Hanscom airport.

### Expected benefits

Education of the local pilots will increase the use of recommended noise abatement procedures and mitigate the effects of noise on the surrounding communities.

### Potential Adverse Effects

None

### Resources required

Man-hours and cost to purchase and post the AOPA Fly Friendly video to all local pilots.

**RECOMMENDATION A15: HANSCOM USER GROUP**

The Workgroup recommends that Massport provide support to ensure that a representative user group be available to all users, pilots and businesses.

Time Frame:  
Immediately

Background:  
During the last three years, the Hanscom Area Resource Team (HART) has taken an active role throughout the GEIR, MOU, Noise Workgroup, etc. processes. Active membership is comprised principally of airport businesses and higher-end private aircraft operators. HART has volunteered to work with Massport to expand its current roster to include all users, pilots and businesses.

Expected benefits:  
Substantial benefit can be gained from having a well informed and involved flying public. By virtue of maintaining a viable user group, issues can regularly be communicated and addressed.

Potential adverse effects:  
None

Resources required:  
Support in kind (i.e. use of copier, meeting room, etc.).  
Possibly a \$500 to \$1000 budget for postage.

## **RECOMMENDATION A16: SELECTMEN AND TOWN BRIEFINGS**

The Workgroup recommends that members of the Hanscom Noise Workgroup brief Town Selectmen on the group's findings. This briefing should include a description of recent efforts to mitigate the effects of noise on surrounding communities as well as an explanation of the local noise abatement procedures. The audience should include both selectmen and all interested towns people.

### Time Frame

Immediate

### Background

#### Expected benefits

Education of towns people and their leaders will help in working towards the common goal of mitigating the effects of noise on the surrounding communities.

#### Potential Adverse Effects

None

#### Resources required

Approximately 10 man hours to develop and deliver briefing.

## **RECOMMENDATION A17: PART 150 STUDY**

The Workgroup recommends that a group representing local pilots, business interests, surrounding communities and Massport be formed to investigate the possibility and implications of reopening the Part 150 study at Hanscom Field.

### Time Frame

Immediate with an end date of one year.

### Background

The noise portion on an FAA Part 150 study establishes a baseline of current noise levels for the airport and its surrounding communities which the FAA requires before determining the necessity for and effectiveness of official noise abatement or mitigation procedures. A Part 150 study was started at Hanscom Airfield some years ago but never completed.

The charter of this group will be to understand the history of the original Part 150 study, determine where problems existed, evaluate if and how these problems can be resolved and determine if the Part 150 study should be reopened. The group should evaluate the expected benefits as well as the potential adverse effects of reopening the study.

### Expected benefits

A determination of whether or not the necessary conditions for a successful Part 150 study exist at the present time will allow the communities and Massport to make an appropriate decision regarding the matter.

### Potential Adverse Effects

None to investigate the possibility and implications of reopening the Part 150 study.

### Resources required

Volunteer time, Massport staff participation and support in kind (use of copier, meeting room, etc.)

## **RECOMMENDATION A18: MODEL QUIET AIRPORT STUDY**

The Workgroup recommends that a group representing surrounding communities, local pilots, business interests, and Massport be formed to define the scope and purpose of a Model Quiet Airport Study at Hanscom Field.

### Time Frame

Immediate with an end date of one year.

### Background

Hanscom Field is a modern general aviation airport situated in a suburban area with great historic significance, many unique sites, extensive open space retention/conservation and recreational facilities, natural resources and scenic waterways, bike paths and walkways. This unique situation may offer a rare opportunity to study issues relating to the running of a modern general aviation airport with the objective of minimal intrusion on the neighboring communities and the National Historic Park.

The charter of this group would be to define the scope and purpose of a Model Quiet Airport Study, indicate how such a study of Hanscom and its surrounding areas could be applied to other airports and investigate forms of funding, both federal, state and local.

### Expected benefits

Hanscom Field offers a unique opportunity to study issues relating to combining the goals of a large modern airport and those of historic neighboring communities and a National Historic Park. Results of a such studies could have local implications and help to mitigate noise related problems.

### Potential Adverse Effects

None

### Resources required

Volunteer time, Massport staff participation and support in kind (use of copier, meeting room, etc.)



## **RECOMMENDATION A19: NON-PROFIT ORGANIZATION**

The Workgroup recommends that a group representing local pilots, business interests, surrounding communities and Massport be formed to explore the idea of establishing a non-profit organization to raise funds to support various noise reduction and awareness programs.

### Time Frame

Immediate with an end date of one year.

### Background

A number of ideas will be studied by members of the Workgroup in the next year. If any of these ideas are viable, they will require funding. The charter of the group should be to investigate what forms of fund raising are and have been done by others, to define the scope and purpose of a non-profit fund raising organization, and to outline the management and control of such an organization.

### Expected benefits

If such an organization could be formed, it might provide funds to support various noise reduction and awareness programs.

### Potential Adverse Effects

None

### Resources required

Volunteer time, Massport staff participation and support in kind (use of copier, meeting room, etc.)

## **RECOMMENDATION A20: NOISE ABATEMENT OFFICER**

The Workgroup recommends that a group representing local pilots, business interests, surrounding communities and Massport be formed to explore the idea of establishing a Noise Abatement Officer position at Hanscom Field.

### Time Frame

Immediate with an end date of one year.

### Background

A designated Noise Abatement Officer has been effective at other airports in educating pilots and promoting issues relating to noise abatement and mitigation. A Noise Abatement Officer is ideally a senior pilot with excellent inter-personal skills, who is present in the ramp areas and at pilot gatherings and has access to noise complaint information.

The charter of this group will be to investigate what has been done at other airports, to define the scope and responsibilities of such an officer, to determine if and how such a position would complement the existing Massport staff and to explore the possibility of having the surrounding communities fund this position.

### Expected benefits

The group will explore the issues surrounding and define the responsibilities of a designated noise officer.

### Potential Adverse Effects

None

### Resources required

Volunteer time, Massport staff participation and support in kind (use of copier, meeting room, etc.)

## **RECOMMENDATION A21: NOISE OVERLAY ZONING**

The Workgroup recommends that a group be formed, including representatives of the Planning Boards from the towns of Lincoln, Lexington, Bedford and Concord, to study the issues associated with the creation of Noise Overlay Zoning Districts.

### Time Frame

Two years

### Background

Prospective buyers and land developers may not be aware of the levels of noise exposure in areas surrounding Hanscom Field. The adverse effect of airfield-related noise can be reduced by managing the built environment in the airfield areas. Noise-sensitive land uses, such as single-family homes and schools could be sited in such a way as to prevent the exposure of area residents to significant noise effects of airport operations. Certain building techniques could be required by zoning that could further lessen the impact of airfield-related noise for both existing and proposed buildings. A Noise Overlay Zoning District is a special type of zoning district that places additional requirements on existing (underlying) zoning districts within a geographical area.

### Expected Benefits

Citizens and representatives of the town boards will be better able to understand the potential benefits and consequences of noise overlay zoning.

### Potential Adverse Effects

None to study the issues associated with the creation of Noise Overlay Zoning Districts.

### Resources Required

Time and resources of Town Planning Boards and Town managements.

# **I. INTRODUCTION TO NOISE METRICS RECOMMENDATIONS**

In the June 30, 1997 Hanscom Generic Environmental Impact Report (GEIR) Certificate, the Massachusetts Secretary of Environmental Affairs asked for formation of a Hanscom Field Noise Workgroup. The Workgroup was made up of community representatives selected by the four Hanscom area towns (Bedford, Concord, Lexington, and Lincoln), representatives from flight groups, including HART and the Air Force, and representatives of Massport.

The Noise Metrics and Modeling Taskgroup is a subcommittee of the Hanscom Field Noise Workgroup. It was created to address three of the issues raised by Massachusetts Secretary of Environmental Affairs. The Noise Metrics Taskgroup was asked to recommend:

- i. An appropriate baseline to measure and evaluate noise impacts and evaluate them;
- ii. A set of metrics that report not only instrument readings, but also the perceived impact of noise events;
- iii. The content and form of noise discussion that Massport is to adopt for the 2000 GEIR Update.

The Workgroup would like to thank Massport for its support of the efforts of the Workgroup. Massport supplied meeting sites, knowledgeable personnel, and paid for the consulting services of their noise experts, HMMH. This spirit of cooperation allowed the production of this report, which we believe can make an important contribution to understanding and quantifying changes in airport noise at Hanscom Field, and help improve community relations.

A significant finding was that the science of noise impacts on people is still developing, and that our recommendations should evolve as more is learned. This report puts forward our current conclusions, but it is likely that further suggestions may arise by the time Massport presents its proposal for the next GEIR. We believe that implementation of these recommendations will facilitate the public assessment of the environmental impacts of current or planned airport activities.

A potentially more important finding was that the noise metrics used in the 1995 GEIR caused a lack of trust, not just of the GEIR, but of the people who created it and paid for it. We believe that implementation of the recommendations outlined herein will improve communications and reduce misunderstanding between the airport and its neighbors. A mutually desirable outcome is a higher level of confidence and cooperation.

## **Overview of Recommendations**

The Noise Metrics Taskgroup recognized that improving noise metrics could involve additional costs to implement. We attempted to minimize costs by using existing noise modeling techniques, existing computer programs, and existing noise instrumentation, as well as better data. We also detailed changes to the noise discussions in future GEIRs to improve communications with the communities. And we recommended a process enhancement to maintain clear understandings between all the parties. These recommendations can be briefly summarized as follows:

- The summary metrics in this report should be used to improve communication with the general public.
- A community group should be chartered to follow up these recommendations.
- The INM model should be used to generate additional noise data in future GEIRs, as per the detailed recommendations provided below.
- The noise discussion in future GEIRs should include information on errors and assumptions, as per the detailed recommendations provided below.

- Additional data and information regarding noise measurements and the computer noise simulation should be provided.
- The noise measurement program should be modified and upgraded.

### **Approach to Noise Metrics**

Designing a noise metric is a difficult job. The first task was to set goals for the metric. After much study, the Metrics Taskgroup developed a number of criteria for an ideal noise metric. An ideal noise metric, or set of metrics, should:

- Account for sound level above ambient noise level
- Account for the duration of aircraft noise events
- Account for the number of aircraft noise events
- Account for the number of people affected
- Account for the absolute sound level of events
- Assess both current aviation operations, and predict impacts of future changes (i.e., changes in the number of operations, or changes in fleet mix)
- Reflect the "peaky" nature of overflight noise (i.e., does not average excessively over space or time)
- Readily express year-to-year and month-to-month changes in the environment caused by overflights
- Correlate, to the best extent possible, to the subjective perceptions of the community affected by overflights
- Provide sufficient detail to allow analysis to understand the root cause of noise and noise trends
- Complement, but not replace, the Day-Night Noise Level (DNL, also referred to as Ldn), which is currently used
- Can be modeled by the Integrated Noise Model (INM) program
- Be measurable by the currently available noise monitoring system
- Permit a rerun of INM data from previous years
- Show the variations of predicted noise levels expected from modeling assumptions and simplifications

It became clear that no single metric meets all these criteria. We determined that at least five metrics were required to adequately show and communicate the various features of aircraft noise impact on the Hanscom area:

- 1) Time Above (TA) - This is a broad metric that changes approximately linearly with the number of aircraft operations, while also showing the effect of changes in fleet mix.
- 2) Single Event Level Distribution (SEL/D) - This is a metric that shows the number of flight operations as a function of noise level.
- 3) Linear, dimensionless metric of Sound Pressure - This is a concept for a metric that expresses the ratio of aircraft-generated sound to the ambient in a non-logarithmic manner (unlike the DNL, which employs decibels, which are based on logarithms). (The Taskgroup made considerable progress toward developing such a metric, but did not complete the work during this phase.)
- 4) Improved DNL - This is an expanded use of DNL.

5) Citizens Summary Metrics - A small subset of the above metrics that can be readily understood by a nontechnical public.

Taken together, we believe that these five metrics could meet the criteria for a good metric. Each metric by itself may cover several of the criteria, but omitting any one metric will cause at least one of the criteria to be unfulfilled.

These metrics are discussed briefly in the Summary Recommendations section (Section II), in the Detailed Explanation of Recommendations (Section III), and in the Technical Discussions section (Section IV). Additional support material is included in Appendix 2.

## II. LIST OF THE METRICS RECOMMENDATIONS

In this section we simply list concise statements of each of the 14 Metrics Recommendations. We supply information on the rationale, details of implementation and expected benefits of each Recommendation individually in Sections III and IV. Readers should take care to read all information on each Recommendation.

- M1. The Workgroup recommends that HATS and HFAC take the responsibility to charter a community group to follow up these metrics recommendations and work with Massport to further develop, refine, and implement the recommendations of this report, review any pre-GEIR data supplied in response to our recommendations, and report to HATS and HFAC on progress related to implementation. This community group, HATS and HFAC should also make suggestions on changes to the noise discussion in the GEIR based on a further review of the 1995 GEIR.
- M2. The Workgroup recommends that all future GEIR and annual Hanscom noise reports include the Time Above Contour metric, with areas included within each contour computed, as a clear way to show changes in exposure to a wide range of aircraft noise.
- M3. The Workgroup recommends that future monthly, yearly, and GEIR Hanscom noise reports include the Single Event Level Distribution (SEL/D) metric to show changes in the distribution of individual noise events.
- M4. The Workgroup recommends that future GEIR Hanscom noise reports include a linear dimensionless metric (to complement the logarithmic decibel metric used for  $L_{dn}$ ) to show exposure to noise energy. The Workgroup recommends that the Follow-up group described in Recommendation M1 continue to study the design of such a metric and methodology for implementation in the next GEIR.
- M5. The Workgroup recommends that the discussion of the noise impact on residential use in future GEIRs include reference to the EPA level of 55 dB DNL and avoid the implication that DNL of less than 65 dB DNL (the FAA mitigation threshold) has no impact.
- M6. The Workgroup recommends that future GEIR's and annual noise reports provide Community Summary Metrics - i.e., Monthly Loud Events Count, Area Impacted by Noise per EPA, and Area Experiencing 30 or more minutes per day of 55 dBA or greater Aircraft Noise. These three single-number measures are intended to be easy for people to understand and relate to their personal experience.
- M7. The Workgroup recommends that whenever data derived from INM modeling are presented, documentation be supplied including a detailed list of the assumptions and model parameters selected by the Massport noise consultants for input to the INM.
- M8. The Workgroup recommends that future GEIRs include: i) a section estimating the expected variation in results from the INM due to the use of different modeling assumptions. Massport should adopt a standard practice of reporting estimated variations as "error bands" when reporting modeled data; ii) the GEIRs should also include a comparison of the results of noise modeling to actual measured noise data, and explanations of differences.
- M9. The Workgroup recommends that future GEIRs include a section explaining the expected short-term variations in noise from the long-term average values.
- M10. The Workgroup recommends that the next GEIR include a section documenting how changes in the FAA Integrated Noise Model data affect the predicted total noise exposure. 1987 is acceptable as a baseline year, provided that available data from 1978 onward be presented in all year-to-year comparisons.
- M11. The Workgroup recommends that three of the six permanent noise monitoring sites be relocated away from local high-level concentrated noise sources.

- M12. The Workgroup recommends that more noise monitoring sites be added. Additional monitors should be placed in appropriate off-runway-axis locations to take account of curved flight paths.
- M13. The Workgroup recommends that a procedure or system be developed that correlates noise events and data to flight operations and complaints. Massport should work with the aviation community to determine the appropriate constructive use of this capability and information.
- M14. The Workgroup recommends that noise data be stored in a publicly-accessible location, such as an internet site.



### **III. METRICS DETAILED RECOMMENDATIONS**

#### **RECOMMENDATION M1: CONTINUING WORK AND FOLLOW-UP**

The Workgroup recommends that HATS and HFAC take the responsibility to charter a community group to follow up these metrics recommendations and work with Massport to further develop, refine, and implement the recommendations of this report, review any pre-GEIR data supplied in response to our recommendations, and report to HATS and HFAC on progress related to implementation. This community group, HATS and HFAC should also make suggestions on changes to the noise discussion in the GEIR based on a further review of the 1995 GEIR.

#### **Applicability and Time Frame**

From the time the Noise Workgroup disbands until the issuance of the next GEIR, subject to the concurrence of HATS.

#### **Background**

The noise workgroup completed the task regarding metrics recommendations, and made significant progress toward but did not complete the task of suggesting changes to the noise discussions in the GEIR. We believe there is value in continuing this work and that the outcome will be beneficial to both the communities and Massport. In addition, the implementation of these recommendations is likely to require ongoing discussions.

#### **Technical discussion**

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD1.

#### **Example**

See technical discussion TD1 for examples of the types of changes to the noise discussion of the GEIR that might be appropriate.

#### **Benefits**

A mechanism for follow up on the recommendations is provided. In addition, by providing suggestions prior to the draft of the next GEIR, Massport will have the opportunity to incorporate them into the GEIR on the first draft, which has the potential to reduce both conflict and any rework expenses relating to the GEIR.

#### **Resources**

A commitment by the HATS subcommittee and a commitment by Massport to work with this group are needed.

## **RECOMMENDATION M2 TIME ABOVE CONTOURS**

The Workgroup recommends that all future GEIR and annual Hanscom noise reports include the Time Above Contour metric, with areas included within each contour computed, as a clear way to show changes in exposure to a wide range of aircraft noise. [See Technical Discussion TD2 for the specific time and level parameters to be used.]

### **Applicability and Time Frame**

The TAC metric should be provided in the next Hanscom Annual Report, but if it were supplied to the communities before that time it would be helpful in interpreting the 1995 GEIR.

### **Background**

By generating contours of Time Above at specified dBA thresholds, and measuring the area inside each contour, a simple metric is created that shows year to year changes in the duration of various levels of aviation noise. Percentage changes in Time Above correlate very well with percentage change in total aircraft operations.

The 1995 GEIR presented measured Time Above data, in tabular format, for L<sub>90</sub> levels (background noise levels) ranging from 35 dBA to 50 dBA (see Tables 2.3-6 through 2.3-8, and discussion of pages 2-90 to 2-93). This recommendation thus amounts to the calculation and presentation of TA contours corresponding to the same data. We recommend that the data tables like those cited above also be continued.

### **Technical Discussion**

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD2. Samples of Hanscom Time Above Contours that Massport provided as part of this study are included in Appendix 2.

### **Benefits**

As a metric, Time Above Contours provide a very good assessment of the duration of time that sites are impacted by aircraft noise and the changes in that impact caused by changes in operations and fleet mix. For example, in the 1995 GEIR, trends are clearly shown and models correlate well with observations. It is a metric that is easy to explain to the public, and so will enhance communications. For example, if noisy jets are replaced by quiet jets, area residents will see that their house is no longer exposed to 30 minutes a day above 65 dBA, and that the area within the 65 dBA contour has shrunk by a significant amount.

### **Resources**

Massport's noise consultant will be needed to generate a number of Time Above Contours, and to calculate the areas inside these contours. Since Time Above contours are already calculated by the INM, this should require little extra effort or expense.

### **RECOMMENDATION M3 SINGLE EVENT LEVEL DISTRIBUTION (SEL/D)**

The Workgroup recommends that future monthly, yearly, and GEIR Hanscom noise reports include the Single Event Level Distribution (SEL/D) metric to show changes in the distribution of individual noise events.

#### **Applicability and Time Frame**

The SEL/D metric should be provided in the next Hanscom GEIR, but if it were supplied to the communities before that time it would be helpful in interpreting the current GEIR.

#### **Background**

Some parts of the Hanscom community are most affected by a small number of very loud aircraft events. These noise events are relatively infrequent and of short duration, so they have little effect on "averaged" noise metrics like DNL. These intense and abrupt increases over the ambient, however, may be responsible for significant annoyance in the communities due to sleep disturbance, speech interference, and other activity interference.

By making a bar graph of the count of aircraft operations, with a bar for every 2 dBA above 90 dBA, a metric is created that clearly shows both the quantity and loudness of the noisiest aircraft operations. The levels themselves need not be measured. Rather, they are levels from the EXP database, which catalogs sound levels for takeoff and landing for each aircraft type. The database values are themselves taken from actual measurements of each aircraft type, taken under standard conditions. (The EXP database is used by Massport as the basis of calculations in the Integrated Noise Model.)

This metric will simplify year-to-year comparisons and observation of trends in very loud events. For example, as noisy jets are replaced by quieter jets, the size of the high-dBA bars will drop linearly with the percentage shift to quieter aircraft.

#### **Technical Discussion**

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD3.

#### **Benefits**

The SEL/D metric provides a good assessment of the impact of very loud aircraft operations and the impact of changes in numbers of very loud events that might occur, for example, as the fleet mix changes. Trends are clearly shown in ways that are easy to explain to the public, and so will enhance communications. For example, if noisy jets are replaced by quiet jets, area residents will see that the 105 dBA bar is lower (see TD3).

#### **Resources**

The monthly Hanscom Noise Report already reports the number of operations by aircraft type. Thus, it will be a relatively straightforward matter to apply the EXP database values to the number of operations, and graph them (e.g., via the use of a spreadsheet program.) Thus, once the methodology is established (e.g., developing a spreadsheet) generation of this metric should require little extra effort or expense, and need not require a noise consultant.

## **RECOMMENDATION M4 LINEAR DIMENSIONLESS METRIC**

The Workgroup recommends that future GEIR Hanscom noise reports include a linear dimensionless metric (to complement the logarithmic decibel metric used for  $L_{dn}$ ) to show exposure to noise energy. We recommend that the Follow-up group described in Recommendation M1 continue to study the design of such a metric and methodology for implementation in the next GEIR.

### **Time Frame/Applicability**

A linear method or metric should be developed and reported in all subsequent GEIRs.

### **Background**

Ldn contours have been generated for past GEIRs using the computer-based Integrated Noise Model (INM). Ldn is a widely used metric, but has been confusing to the public on a number of counts.

The Metrics Taskgroup explored, but did not complete its work on, a linear dimensionless metric. The Taskgroup did agree, however, that a linear dimensionless metric comparing Aviation to Ambient Sound Pressure or Sound Energy remains a worthy goal, as decibels tend to obscure the true scale of noise exposure. For example, an increase of DNL from 55 to 58 dB will seem, to those expecting a linear scale relationship, to be a minor increase. In reality, of course, such an increase actually represents a doubling of sound energy. It is this sort of misinterpretation the Taskgroup seeks to dispel.

### **Technical Discussion**

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD4.

### **Benefits**

A linear noise energy exposure metric will be more easily understood by the public than a logarithmic (dB) metric, and can be scaled to avoid inappropriate comparisons with other noise measurements and metrics. Changes in the area inside each contour related to such a metric provide an easy way to compare one year with another, showing trends and changes in aviation noise energy exposure.

### **Resources**

We expect that Massport's noise consultant will need to be involved in the determination of a linear metric. Thus, funding may be required. It may be appropriate to seek outside or Federal funding for such an effort.

## **RECOMMENDATION M5: EXPANDED DISCUSSION OF DNL**

The Workgroup recommends that the discussion of the noise impact on residential use in future GEIRs include reference to the EPA level of 55 dB DNL and avoid the implication that DNL of less than 65 dB DNL (the FAA mitigation threshold) has no impact.

### **Applicability and Time Frame**

Discussion and explanation of this issue should be provided in the next Hanscom GEIR.

### **Background**

There are conflicting positions on what DNL level constitutes a problem for residential use:

- The FAA defines areas subject to DNL of greater than 65 dB to be "incompatible with residential land use", and such affected areas may be eligible for noise mitigation funding.
- The U.S. EPA has established through reports and administrative comments that 55 dB is the noise limit that is satisfactory to protect human health and welfare in a residential setting –"Outdoor yearly levels on the Ldn [DNL] scale are sufficient to protect public health and welfare if they do not exceed 55 dB in sensitive areas (residences, schools, and hospitals)." (EPA Publication #319, "Protective Noise Levels", 1978).
- Concerns regarding the exclusive use of 65 dB DNL have been expressed repeatedly and consistently at various meetings of the Federal Interagency Committee on Aircraft Noise (FICAN.) The 1997 FICAN Annual Report (p. 16 – 17) makes it clear that the issue of 65 dB DNL as the proper level of land use compatibility is widely questioned, and that this DNL is no longer considered appropriate, particularly in suburban and rural areas.

Given these contrasting opinions, we concluded that discussion of the impact of both 65 dB and 55 dB Ldn levels would provide additional data that would be very useful to present and future Hanscom noise analysts.

### **Technical Discussion**

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD5.

### **Benefits**

Until the disagreement between U.S. agencies is resolved about the optimum use of Ldn, the appropriate level at which there is potential noise impact will remain open to argument. Instead of choosing only one Ldn level or the other, discussion of both levels of potential impact will allow current and future noise analysts to better evaluate and understand impacts and trends, and plan mitigation options, pending agreement on an acceptable Ldn level.

### **Resources**

Massport's noise consultant will be needed to research and write up a discussion of potential impact at the 55 dB Ldn level

**RECOMMENDATION M6 COMMUNITY SUMMARY METRICS**

The Workgroup recommends that future GEIRs and annual noise reports provide Community Summary Metrics - i.e., Monthly Loud Events Count, Area Impacted by Noise per EPA, and Area Experiencing 30 or more minutes per day of 55 dBA or greater Aircraft Noise. These three single-number measures are intended to be easy for people to understand and relate to their personal experience.

**Applicability and Time Frame**

These metrics should be used on Hanscom noise data and the results reported in the GEIR, and in the Annual Noise Report.

**Background**

A great deal of misunderstanding regarding the airport occurs because there are people in the communities who don't understand the Hanscom noise information currently provided by Massport. We found that in many cases it is not the data that is the problem, but rather the way the data is summarized and communicated to the public. For example, table 4.3-3 of the 1995 GEIR shows a count of the Hanscom area residences "impacted by Aircraft Noise", and concludes that 29 residences are impacted in Bedford and zero residences are impacted in Concord, Lexington, and Lincoln. This is confusing to many people in these towns, since (based on their direct experience with Hanscom noise) they consider themselves impacted.

We distilled summary metrics from the detailed noise data. These metrics will be more acceptable to the public, and will overcome many of the problems associated with the more commonly used DNL contours. The necessary calculations have either been performed already, or will be as part of previous recommendations:

- Area Experiencing 30 or more minutes per day of 55 dBA or greater Aircraft Noise. – Time Above Contours recommendation
- Area Impacted by Noise per EPA – present DNL contours
- Monthly Loud Events Count – from monthly operations data and EXP database. (This is a distillation of the results from the SEL/D recommendation.)

**Technical discussion**

A detailed technical discussion is provided in Technical Discussion TD6.

**Example**

The three Community Summary Metrics are computed in a straightforward manner from other data used in the INM model as shown:

<b>Metric</b>	<b>Source (how computed)</b>	<b>Include In</b>
Area Experiencing 30 or more minutes per day of 55 dBA or greater Aircraft Noise	Area of 30 minute contour for Time Above 55 dB	GEIR, Annual Noise Reports
Area Impacted by Noise per EPA	Area of 55 dB DNL contour	GEIR, Annual Noise Reports
Monthly Loud Events Count	Events (count) per month > 94 dB departure SEL from EXP database	GEIR, Annual, Monthly Noise Reports

**Benefits**

The benefits include a greater acceptance of Massport's Environmental Impact Reports by the public, and more confidence on the part of the public that noise impacts are understandable and have been disclosed.

**Resources**

Additional annual INM runs may be required.

## **RECOMMENDATION #7: NOISE MODELING ASSUMPTIONS**

The Workgroup recommends that whenever data derived from INM modeling are presented, documentation be supplied including a detailed list of the assumptions and model parameters selected by the Massport noise consultants for input to the INM.

### **Applicability and Time Frame**

This information should be provided in the next GEIR, but if it were supplied to the communities before that time it would be helpful in interpreting the current GEIR

### **Background**

Modeling is an attempt to predict the effect of an actual event by purely mathematical means. Interpretation of modeling results requires an understanding of the assumptions that have been made in the math model, as well as the sets of numbers used as inputs. It is standard procedure in scientific disciplines to explicitly state assumptions and input parameters when models are used.

We identified some modeling assumptions that we believe may have serious effect on the INM model results and we find that the nature of the assumptions has not been clearly communicated in the GEIR. Some of these assumptions may be under the control of the person running the model; others are “built in” to the Integrated Noise Model computer program, and therefore not subject to Massport or its consultant’s discretion. In either case, GEIR readers should understand and appreciate the assumptions and limitations inherent in the model. Where choices have been made by Massport or its consultant, they should be made explicit. Where the INM allows no options, it should also be made clear.

### **Technical discussion**

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD7

### **Example**

Examples of the types of assumptions that need to be made explicit and validated include:

- Aircraft climb profile assumptions.
- Aircraft takeoff weights
- Noise profile for groups: What noise profile is assumed for an aircraft group if actual aircraft types within the group generate different noise levels?
- Helicopter modeling: Are these flights included in the modeling and are any different assumptions regarding flight tracks or climb profiles used?
- Run-up: Does the INM include “run-up” operations (INM 5.1 Manual, p.9-14)?
- Flap settings: What flap settings (coefficients) are being assumed (INM 5.1 Manual, p. 8-41)?
- Track patterns vs. type: Do track patterns for noisy jets (like G2) differ from quieter jet track patterns (like Class 3)? If yes, are they modeled as one category?
- Temperature: Is the default INM temperature used and is it the appropriate choice?
- Other fundamental assumptions: Any assumptions that are input to the model which may materially affect the output should be made explicit.

### **Benefits**

Listing and justification of all assumptions made in applying the INM can help to establish a confidence level required for a satisfactory and meaningful communication of the model’s predictions. If the GEIR comparisons of changes in overflight impacts on the population around the Hanscom Field airport are to be meaningful, then the year-to-year assumptions must be compared explicitly to confirm that they are identical. Making communication of such assumptions part of the GEIR Report clarifies the noise prediction process, and ensures that all comparisons, over any time period, be made with equivalent assumptions. If appropriate, adjustments to the assumptions should be identified and explained, and be made to improve the predictive accuracy of the models.

**Resources**

Massport should provide the INM documentation to the HATS Environmental Subcommittee and Topic Review Committees, or else include detailed discussions of assumptions and input choices as part of the GEIR. Where information is not available from the INM manual, Massport's noise consultant may need to meet with interested parties to identify assumptions made.



## RECOMMENDATION M8: MODELING ERRORS

The Workgroup recommends that future GEIRs include: i) a section estimating the expected variation in results from the INM due to the use of different modeling assumptions. Massport should adopt a standard practice of reporting estimated variations as “error bands” when reporting modeled data; ii) the GEIRs should also include a comparison of the results of noise modeling to actual measured noise data, and explanations of differences.

### Applicability and Time Frame

This information should be provided in the next GEIR.

### Background

In the past, GEIR Reports have not included any estimates of potential errors associated with the various assumptions made in the input to the model or techniques applied in order to facilitate and simplify the computations. The Workgroup believes that estimation and display of such effects is crucial and recommends that such estimation and display be an integral part of any future GEIR updates. By way of analogy, when predictions are made regarding the expected results of an election or results of public opinion polling are reported, it is standard practice to associate some measure of error with the predicted or sampled result. In other words, modeled DNL data should be accompanied with a statement "this is a 65 dB contour, but the accuracy of this INM modeled data is estimated at  $\pm 1$  dB or  $\pm 10$  dB," etc. (as appropriate)

As a second point, we note that it is standard procedure in scientific disciplines to discuss variations in measured data, and differences between modeled and measured data.

This is not simply an academic question because there are some substantial unexplained differences between DNL values predicted by the model and the actual measurements. The measured and predicted values off the ends of the main runway differ by many dB at many of the permanent and temporary sites discussed in the 1995 GEIR.

To understand the magnitude of an 8 dB DNL difference, consider the following: the number of aircraft operations fed to the model would need to be increased by a factor of six to raise the predicted DNL values the 8 dB required to match the measured values.

The Noise Workgroup recognizes that reporting data variation is dependent to a large degree on the capabilities of the Integrated Noise Model and the accuracy of the noise monitoring system. Noise modeling with a distribution of input parameters and modeling assumptions will likely increase the cost of modeling results. Nevertheless, the Workgroup believes that GEIRs must explain and quantify the differences between measured and modeled data, and the variations due to modeling assumptions.

### Technical discussion

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD8.

### Example

Examples of input data assumptions that impact the results of INM modeling and that should be described include:

- Wind: estimate the effect of the simplifying assumption that wind patterns are uniform from season to season.
- Fleet Mix along different flight tracks: estimate the effect of the simplifying assumption that fleet mix is uniform on all flight tracks.
- Flight track bundling : estimate the expected noise level variation due to simplifying assumptions in the modeling due to **track bundling** at various locations within the four-town area and at various distances away from the airport

**Benefits**

By discussing the sources of variation in the model and the magnitude of their consequences, the public gains greater confidence in the model and of the noise predictions made using the model.

**Resources**

It may be that this type of information has been developed as part of ongoing refinement of the INM, and as part of successive analyses for Hanscom. However, it is not, to our knowledge, documented. Providing this information will require additional work by Massport and its noise consultant. In particular, much work may be required to quantify the magnitude of data variation.

## **RECOMMENDATION M9: EXPECTED VARIATIONS FROM AVERAGES**

The Workgroup recommends that future GEIRs include a section explaining the expected short-term variations in noise from the long-term average values.

### **Applicability and Time Frame**

This information should be provided in the next GEIR.

### **Background**

The results of noise modeling and measurement are averaged over long periods of time such as months or even a year. Human beings do not average their response over such long durations. Long term averaging can be a misleading predictor for impact for phenomena that occur with “clumps” or “bursts” of activity.

In a 1997 US congressional hearing on aircraft noise, it was pointed out by Representative Rivers that “There’s an old saying that if you have a raging fire in front of you and an open window blowing snow behind you, on average, you feel great, but of course you don’t”.

It is well known in the communities that concentrations of aircraft noise seem to move around from day to day, with some days at a given location being virtually silent while other days at the same site are unbearable.

We found that this variation greatly affects the perceived impact of the airport and that an attempt should be made to understand and quantify this effect, which is obscured by the averaging of the models and measurements.

### **Technical discussion**

Runway use is very much controlled by prevailing winds. Averaging the effect of aviation departures and arrivals over the entire year, results in a lower  $L_{dn}$  level per runway than the actual level registered on days that such a runway is used exclusively.

The currently reported  $L_{dn}$  levels are estimated by averaging the number of flights over the entire year (done separately by day, night, and runway). However, each Hanscom Field runway (5, 11, 23, and 29) tends to be used exclusively on some days of the year and not at all on other days. Runway usage is determined by wind direction, with takeoffs and landings being made into the wind. It follows that residents under a specific runway are exposed to essentially ambient noise on days the runway is not used, and to a much higher than reported  $L_{dn}$  on days the runway is used exclusively.

A supplemental technical discussion for this recommendation is provided under Technical Discussion TD9

### **Example**

To provide an understanding of this effect, LDN under a flight path should be calculated for a location for days where the runway is in use, and then compared with the long term LDN (which includes days when the runway is not in use). In this way it will be possible to understand how much “extra” LDN is experienced on a “traffic” day. The example in the Technical Discussion shows that the Bedford/Lincoln flight paths may experience DNL values 5dB higher than the long term averages on those “traffic” days where the 5/23 runway is in use.

### **Benefits**

Citizens know that aircraft noise moves from day to day. Many citizens have had the experience of a heavy traffic day and do not understand if this indicates growth or how it relates to the averages. We need to explain that such variations are normal and how much a “daily” DNL can be expected to vary from the averages.

### **Resources**

A discussion and calculation similar to that provided in the Technical Discussion could be done by the noise consultants used during the next GEIR.

## **RECOMMENDATION M10: MAINTAINING CONSISTENCY ACROSS INM MODEL CHANGES**

The Workgroup recommends that the next GEIR include a section documenting how changes in the FAA Integrated Noise Model data affect the predicted total noise exposure. 1987 is acceptable as a baseline year, provided that available data from 1978 onward be presented in all year-to-year comparisons.

### **Applicability and Time Frame**

Information about changes in EXP data was provided in the 1995 Hanscom GEIR Update (Tables 2.3-9 and 2.3-10) and this recommendation is to continue to provide and discuss such information in future GEIRs.

### **Background**

The Integrated Noise Model (INM) computes predicted noise exposures based on an underlying set of noise data for individual aircraft types. From time to time, the FAA updates the data on the noise output from different aircraft types. This occurs when new aircraft types are added to the model, and when new or better information about specific existing aircraft types is discovered.

These changes to the underlying data are an attempt to make the model more accurate. However, these model changes can interfere with trending analysis.

This problem was recognized in the 1995 GEIR update and the EXP data was provided using both the past INM model and the latest INM model data. This recommendation is that such analysis become a standard part of the GEIR.

In addition, we note that in the June 30, 1997 GEIR Update Certificate (p. 8), the Secretary requested that before Massport begins its 2000 Update, the Workgroup determine “an appropriate baseline to use as a starting point for measuring Hanscom Field’s noise impacts on the surrounding communities and on the value of information derived using this baseline.”

Having reviewed the record of noise studies for Hanscom, we recommend that year-to-year comparisons of noise impacts include all years since 1978 for which comparable data are available. If this is done, the Workgroup is willing to accept the use of 1987 as the “baseline year”, since the aggregate noise impact (as determined by the INM) is approximately the same for 1978 and 1987. Also, 1987 is the first year that database values are available in fully electronic form. It must be noted, however, that the fleet mixes in 1978 and 1987 were different. Thus, “baseline” cannot refer to the number of operations, as noise impacts of different aircraft differ. “Baseline” is used here to refer only to the combined noise impacts.

### **Technical discussion**

A detailed supplemental technical discussion is provided in the Technical Discussion TD10.

### **Example**

The total noise exposure (EXP) is a single number summarizing the acoustic output of the airport and is computed from the SEL values used in the INM database. Massport also breaks EXP down into its military, jet, and single-engine components. To provide continuity, current EXP calculations should be done with the same model that has been used in the last GEIR, and then repeated with the most current model. This will prevent changes in the model from obscuring trending data.

### **Benefits**

This avoids ambiguity regarding whether trending conclusions are affected by model changes, and thereby provides a more complete disclosure of changes in noise impact.

### **Resources**

This work was done in the 1995 GEIR and therefore we do not envision it to be significant incremental work for the next GEIR.

## **RECOMMENDATION M11: RELOCATION OF NOISE MONITORING SITES**

The Workgroup recommends that three of the six permanent noise monitoring sites be relocated away from local high-level concentrated noise sources.

### **Applicability and Time Frame**

Since the equipment at the six noise monitoring sites already exists, relocation could be implemented as soon as a source of funds is identified and the funds are allocated. An estimated period of 2 years would seem more than adequate to complete the project.

### **Background**

Six permanent noise monitoring sites are located in the Hanscom Field area. These are supplemented by a number of temporary monitoring locations. Local site anomalies at three of the permanent sites (sites 34, 35, and 36) result in measurements which do not represent the true ambient noise characteristics of the surrounding local region.

### **Technical Discussion**

A detailed supplemental technical discussion is provided in the Technical Discussion TD11

### **Benefits**

Since the poorly located noise monitors represent nearly 50% of the noise sensors, significant improvements in the accuracy of measurements of the overall noise picture will result from a limited investment. Data to be published in the future GEIRs should more accurately represent the 4-town ambient noise environment.

### **Resources**

It is understood that the resources to move monitoring sites may be significant. Workgroup members have offered to help work with property owners to achieve necessary relocations.

## **RECOMMENDATION M12: ADDITIONAL NOISE MONITORING SITES**

The Workgroup recommends the addition of more noise monitoring sites. Additional monitors should be placed in appropriate off-runway-axis locations to take account of curved flight paths.

### **Applicability and Time Frame**

This is a significant project, requiring study to determine the number and locations of future measurement sites, allocation of funds, project planning, approval by neighbors, installation of the equipment, and reconfiguration of the existing system to accommodate new monitors. A preliminary study and system expansion proposal should be undertaken as soon as possible, with results available within a year. Actual expansion will take much longer.

### **Background**

The six existing monitoring sites are aligned with the axes of the four Hanscom runways (two off each end of runway 11/29, and one off each end of 5/23.) However, as the GEIR makes clear, flight tracks frequently curve well away from straight alignment with the axes of the runways. Therefore, the existing monitors do not adequately measure the noise of aircraft operations that curve away from straight flight tracks.

We recognize the cost associated with acquisition and operation of a more extensive monitoring system. Nevertheless, we believe that adding more monitoring sites is essential for adequately assessing the actual noise impact of Hanscom flight operations.

### **Examples**

Aircraft, especially jets, typically depart runway 29 on a flight toward New York City or other major destinations to the southwest. On takeoff, these aircraft can leave the runway well before its end, and will begin heading southwest even before crossing the western boundary of the airfield. Thus, by the time they are as far from the field as Site 36 (the farthest monitor off the end of Runway 29), they may be more than a mile south of the monitor.

### **Benefits**

Significant improvements in the accuracy of measurements of the overall noise picture of the 4-town area will result from investment in more noise monitors. Data to be published in the future GEIRs should more accurately represent the 4-town ambient noise environment.

### **Resources**

The actual number of monitors needed, their locations, and costs must be determined by further study.

### **RECOMMENDATION M13: CORRELATE MEASURED NOISE DATA WITH PLANES AND FLIGHT PATHS**

The Workgroup recommends that a procedure or system be developed that correlates noise events and data to flight operations and complaints. Massport should work with the aviation community to determine the appropriate constructive use of this capability and information.

#### **Applicability and Time Frame**

This information will provide guidelines for aircraft operating procedures aimed at minimizing noise impact without jeopardizing safety. A preliminary study would be needed to determine computer software, data transmission and storage hardware required.

#### **Background**

The present procedure is to calculate hourly DNL and other noise statistics locally at each monitor site. The results of the calculations, but not the raw data, are uploaded to the central system once each day for reporting of measured noise and statistics. The lack of event data prevents correlation with flight records and radar tracks.

#### **Technical Discussion**

Instead of saving only calculated results, time-stamped measured data at the event level should be saved and transmitted to the central system. This will enable correlation of measured noise events with radar data, which are already stored.

Many airports have this capability and use it to diagnose and quantify problems.

#### **Benefits**

Identification of the sources of the most serious noise impacts will become possible. Tools will be provided for more effective noise management and noise abatement at Hanscom Field.

#### **Resources**

Expert assistance in noise analysis, data network and storage hardware design and computer programming may be required

## **RECOMMENDATION M14: STORE NOISE DATA IN A PUBLICLY-ACCESSIBLE LOCATION**

The Workgroup recommends that noise data be stored in a publicly-accessible location, such as an internet site.

### **Technical Discussion**

It is recommended that both INM input data and actual measured noise data should be stored in a central system and available to public access via the Internet. Actual noise data should be time stamped and source-identified.

Community groups such as the follow-on group described in Recommendation M1 can perform further analysis, test different models, forming conclusions and recommendations useful to Hanscom Airfield and Massport at no cost to those organizations or to the public.

If summary noise information, such as reports, can be made available via the internet, town residents will be better informed on aircraft noise issues, with increased confidence in abatement measures. Town Planning Boards can easily obtain data specifically targeted at such issues as possible noise overlay zoning, and the siting of suitable land development to minimize noise impact on prospective users.

### **Example**

An excellent example of public access to airfield noise data is the Web site of Minneapolis-St. Paul Airport (MSP), viewable at [www.macavsat.org](http://www.macavsat.org). This site shows current and detailed, timestamped flight noise data such as LDNs, at locations selectable by the viewer from a displayed Twin Cities map.

For access to INM data or raw measured noise data, simpler methods such as internet FTP sites or even floppy disk distribution are possible.

### **Resources**

If the raw data is provided it may be possible to get community volunteers to develop the necessary internet capabilities for implementation of this recommendation



## IV. DETAILED TECHNICAL DISCUSSIONS IN SUPPORT OF THE RECOMMENDATIONS

### TD1. TECHNICAL DISCUSSION: CONTINUING WORK AND FOLLOW-UP

#### **Recommendation:**

The Workgroup recommends that HATS and HFAC take the responsibility to charter a community group to follow up these metrics recommendations and work with Massport to further develop, refine, and implement the recommendations of this report, review any pre-GEIR data supplied in response to our recommendations, and report to HATS and HFAC on progress related to implementation. This community group, HATS and HFAC should also make suggestions on changes to the noise discussion in the GEIR based on a further review of the 1995 GEIR..

#### **Discussion:**

The following are examples of suggestions that have resulted from a review of the 1995 GEIR and show the kinds of modifications that may be recommended for future GEIRs:

- Due to the changes in the design and use of Minute Man National Historical Park (MMNHP), the activities at the Visitor Center location should now be categorized as a “short hike” and not as an “overlook” location for purposes of annoyance analysis in the GEIR.
- In GEIR discussions regarding Community Impact, it should be noted that recent research has shown that DNL dominated by Aircraft operations has a significantly higher measured annoyance than DNL resulting from other noise types such as traffic noise. This caveat should be provided in A) the presentation of the “Schultz curve” where it further should be pointed out that this 1978 curve was generated using a mix of noise types and in B) the presentation of Representative DNL Levels from various sources.
- The title of tables containing the type of data in table 4.3-3 from the 1995 GEIR should be relabeled “Residential Land Use Incompatible with Aircraft Noise from Hanscom Field” instead of the current title “Residential Land Use Impacted by Aircraft Noise from Hanscom Field”.
- The calculation of Ldn associated with aviation noise uses averages of noise levels that may be more than 60 dB apart. Equivalently, this implies averaging of quantities (such as acoustic energy levels) that range from a magnitude of 1 to a magnitude of more than 1,000,000. Representation of such a widely varying quantity by a single (average) value is highly questionable, therefore, it should be discussed extensively and closely scrutinized by the HATS' future environmental subcommittee prior to the next GEIR.
- At some airports, notably those in California, measures and metrics make use of the Estimated Perceived Noise Level (EPNL) in addition to, or as a replacement for, those based on A-weighting. This metric has been discussed in the 1996 Logan GEIR Update (page 6-2). The EPNL, like A-weighting, is a frequency broadband measure (i.e., it measures across the entire range of frequencies perceived by the human ear.) But, whereas A-weighting is a simple weighting curve that roughly corresponds to the frequency sensitivity of human hearing, EPNL accounts for the increased annoyance of sounds that are rich in pure tone components. The EPNL was developed specifically to address the annoyance factor of aircraft sounds. The EPNL is measured as part of the Federal Aviation Administration aircraft certification process (FAR, Part 36.) Future review should consider the measurement and evaluation of EPNL-based measures and metrics at Hanscom.

**TD2. TECHNICAL DISCUSSION: TIME ABOVE METRICS**

**Recommendation:**

The Workgroup recommends that all future GEIR and annual Hanscom noise reports include the Time Above Contour metric, with areas included within each contour computed, as a clear way to show changes in exposure to a wide range of aircraft noise.

**Discussion:**

The Time Above (TA) metric was used extensively in the 1995 GEIR. The HATS Topic Review Committee suggested in its comments (*Noise TRC Report*, June 1997) that the Time Above metric needs further attention. We believe Time Above provides the community with more easily understood information about airport noise conditions. We have reviewed the use of this metric, and propose that Massport expand the Hanscom Field Airport noise analysis using an extension of the TA Metric.

**TD2.1 Background**

Most of the noise metrics used for reporting airport noise are reported in terms of sound pressure levels in decibels (dB). The TA metric is reported in units of time - usually minutes. The metric is the amount of time the noise levels are over a given sound level in dB. For example, the GEIR presented TA data for levels above 85, 75 and 65 dBA. It also presented data for time above the ambient noise level ( $L_{90}$ ). Table 2-1 is a summary of ambient noise and baseline time above data from the 1995 Hanscom GEIR.

**TABLE 2-1: 1995 Baseline Conditions (From Table 2.3-8 of the GEIR)**

Loc. #	Address	Meas. $L_{90}$	Meas. $L_{dn}$	Calc. $L_{dn}$	Calculated 24 Hour Time Above (minutes) for Average Annual Day						
					85	75	65	50	45	40	35
31	Concord Localizer: Measured	34	67	69	2	20	56				559
32	Bedford Localizer: Baseline	43	67	66	1	13	41		215		
33	Lincoln - Brooks Rd: Baseline	37	57	61	0	2	21				480
34	Bedford - DeAngelo: Baseline	50	60	57	0	2	16	126			
35	Lexington - Preston: Baseline	45	61	52	0	2	10		104		
36	Concord Wastewater: Baseline	54	62	55	0	1	14	123			

**TD2.2 Review of the data**

We conducted a review of the data presented in the 1995 Hanscom GEIR. This review found that the percentage change in TA correlates very well with the percentage change in total aircraft operations. This suggests that appropriately structured TA data is a good indicator of air traffic level. It should be noted that the changes in  $L_{dn}$  did not follow these patterns, suggesting that  $L_{dn}$  (by itself) is an incomplete metric.

The tables at the end of this section provide this data for the six permanent monitoring locations. Table 2 is a summary of the fleet mix data taken from the GEIR. It lists numbers of aircraft and percentage increases that we calculated. Tables 3 through 8 list the calculated time above 85, 75 and 65 thresholds and time above  $L_{90}$ . This data is from Tables 4.3-4, 4.3-6 and 4.3-8 of the GEIR. The second part of each table is the percentage increase. Note that in all locations the TA/ $L_{90}$  matches the total % air traffic increase. The TA/65 and TA/75 matches the data, but not as well. The TA/85 does not match at all. This suggests that the lower TA levels will be most useful in this metric.

### **TD2.3 Time Above Recommendations**

We propose two metrics based on the Time Above parameter. They are the Time Above Contour and Area within the Time Above Contour (ATAC).

#### **TD2.3.1 Time Above Contour**

The 1995 GEIR presented measured Time Above data, in tabular format, for levels ranging from  $L_{90}$ 's of 35 dBA to 50 dBA (see Tables 2.3-6 through 2.3-8, and discussion of pages 2-90 to 2-93). This recommendation thus amounts to the calculation and presentation of TA contours corresponding to the same data. (We also recommend that the data tables like those cited above also be continued.)

We recommend that contours of Time Above for three thresholds be created: 45 dBA, 55 dBA, and 65 dBA.

45 dBA is about the level that exists for the quietest 10% of time (the  $L_{90}$ ), based upon measurements at noise monitors around Hanscom (see 1995 GEIR, pages 2-90 through 2-93.)

55 dBA is a level for which Massport has calculated Time Above contours for the area surrounding Logan Airport (along with other levels.) 55 dBA is the level defined by the Commonwealth of Massachusetts to be considered in violation of state regulation for noise pollution in 310 CMR 7.3.10, although this regulation is preempted by Federal law for aircraft.

Finally, the 65 dBA threshold represents the amount of time the noise level exceeds the outdoor speech interference level.

The Workgroup recognizes that 45 dBA contours may extend to distances from Hanscom for which the flight track data available does not accurately reflect actual aircraft operations. Further, there are many areas in which other noise sources (e.g., route 128 traffic) may raise the  $L_{90}$  to levels above 45 dBA. Thus, if Massport's noise consultant can definitively demonstrate that 45 dBA contours are not practical or meaningful, this part of the recommendation can be dropped.

When used in GEIR-type reports, the computed TACs should be compared to baseline TACs. We believe that changes in the shapes of the multiple TACs will provide a clear and meaningful representation to the community of the perceptible noise effects.

#### **TD2.3.2 Area within TA Contours (ATAC)**

Using the computations for the TAC metric discussed above, we recommend that the area within specified contours be computed and reported. The computation should be performed for all meaningful contours. This data should be presented in a table and compared (as percent changes) to appropriate baseline data.

Tabulated TA Contour Area information can be communicated to the public much more effectively than the contour plots and can be used for trending which is very difficult to do with contour plot overlays.

#### **TD2.4 Review of TA Contours for Hanscom Field**

Harris Miller Miller & Hanson, Inc., noise consultants, created Time Above Contours at the request of Massport in support of the Metrics Taskgroup of the Hanscom Noise Workgroup. These contours and areas, together with HMMH's discussion are included in Appendix 2. These contours and discussion are very informative, and show clearly the value and practicality of this recommendation. The Workgroup expresses its appreciation to Massport for supporting this additional effort.

#### **TD2.5 Sample Calculations**

The following tables, using data from the 1995 GEIR (Tables 2.3-6 through 2.3-8, and Section 4.3.2.1 Tables 4.3-4 through 4.3-8) show present and growth scenario Time Above data at noise monitor locations. The Workgroup finds this data to be valuable and informative, and recommends that this form of presentation be included in future GEIRs.

**TABLE 2-2: Aircraft Operation and % Increase for GEIR Scenarios**

Condition	# Operations			% Increase over Baseline		
	Single	Jets	Total	Single	Jets	Total
Baseline	447	30	521	-	-	-
2000/1%	451	41	548	1%	37%	5%
2000/3%	498	46	604	11%	51%	16%
2010/1%	459	67	605	3%	123%	16%
2010/3%	616	90	812	38%	199%	56%

**TABLE 2-3: GEIR Data for Location 31, Concord Localizer**

24 Hour Time Above	85	75	65	L <sub>90</sub> (35)	L <sub>dn</sub>
Baseline	2	20	56	559	69
2000/1%	2	21	58	589	69
2000/3%	2	23	64	648	69
2010/1%	3	23	63	641	68
2010/3%	0	31	85	856	69
% Increase over Baseline	85	75	65	L <sub>90</sub> (35)	Δ L <sub>dn</sub>
2000/1%	0%	5%	4%	5%	0
2000/3%	0%	15%	14%	16%	0
2010/1%	50%	15%	13%	15%	-1
2010/3%	-100%	55%	52%	53%	0

**TABLE 2-4: GEIR Data for Location 32, Bedford Localizer**

24 Hour Time Above	85	75	65	L <sub>90</sub> (45)	L <sub>dn</sub>
Baseline	1	13	41	215	66
2000/1%	2	14	43	225	67
2000/3%	2	16	47	247	67
2010/1%	2	16	47	244	67
2010/3%	0	21	62	326	68
% Increase over Baseline	85	75	65	L <sub>90</sub> (45)	Δ L <sub>dn</sub>
2000/1%	100%	8%	5%	5%	1
2000/3%	100%	23%	15%	15%	1
2010/1%	100%	23%	15%	13%	1
2010/3%	-100%	62%	51%	52%	2

**TABLE 2-5: GEIR Data for Location 33, Lincoln - Brooks Road**

<b>24 Hour Time Above</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (35)</b>	<b>L<sub>dn</sub></b>
Baseline	0	2	21	480	61
2000/1%	0	2	22	507	61
2000/3%	0	3	22	558	61
2010/1%	0	3	24	552	60
2010/3%	0	4	32	738	62
<b>% Increase over Baseline</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (35)</b>	<b>Δ L<sub>dn</sub></b>
2000/1%	0%	0%	5%	6%	0
2000/3%	0%	50%	5%	16%	0
2010/1%	0%	50%	14%	15%	-1
2010/3%	0%	100%	52%	54%	1

**TABLE 2-6: GEIR Data for Location 34, Bedford - DeAngelo Road**

<b>24 Hour Time Above</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (50)</b>	<b>L<sub>dn</sub></b>
Baseline	0	2	16	126	57
2000/1%	0	2	17	131	58
2000/3%	0	2	19	145	58
2010/1%	0	3	18	141	58
2010/3%	0	3	24	188	59
<b>% Increase over Baseline</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (50)</b>	<b>Δ L<sub>dn</sub></b>
2000/1%	0%	0%	6%	4%	1
2000/3%	0%	0%	19%	15%	1
2010/1%	0%	50%	13%	12%	1
2010/3%	0%	50%	50%	49%	2

**TABLE 2-7: GEIR Data for Location 35, Lexington - Preston Road**

<b>24 Hour Time Above</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (45)</b>	<b>L<sub>dn</sub></b>
Baseline	0	2	10	104	52
2000/1%	0	1	11	109	53
2000/3%	0	1	12	120	54
2010/1%	0	1	12	117	54
2010/3%	0	1	16	156	55
<b>% Increase over Baseline</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (45)</b>	<b>Δ L<sub>dn</sub></b>
2000/1%	0%	-50%	10%	5%	1
2000/3%	0%	-50%	20%	15%	2
2010/1%	0%	-50%	20%	13%	2
2010/3%	0%	-50%	60%	50%	3

**TABLE 2-8: GEIR Data for Location 36, Concord Wastewater**

<b>24 Hour Time Above</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (50)</b>	<b>L<sub>dn</sub></b>
Baseline	0	1	14	123	55
2000/1%	0	1	16	129	55
2000/3%	0	1	17	142	55
2010/1%	0	1	17	139	55
2010/3%	0	1	23	185	56
<b>% Increase over Baseline</b>	<b>85</b>	<b>75</b>	<b>65</b>	<b>L<sub>90</sub> (50)</b>	<b>Δ L<sub>dn</sub></b>
2000/1%	0%	0%	14%	5%	0
2000/3%	0%	0%	21%	15%	0
2010/1%	0%	0%	21%	13%	0
2010/3%	0%	0%	64%	50%	1

### TD3. TECHNICAL DISCUSSION: SINGLE EVENT LEVEL DISTRIBUTION (SEL/D)

#### Recommendation:

The Workgroup recommends that future monthly, yearly, and GEIR Hanscom noise reports include the Single Event Level Distribution (SEL/D) metric to show changes in the distribution of individual noise events.

#### Discussion:

##### 3.1 Introduction to SEL/D

At the start of this study, we established Criteria for a set of good noise metrics. DNL (as commonly used today) accounts for cumulative exposure to noise energy from the airport. Our recommended Time Above Contours account for the number of people exposed, as well as the total duration of noisy events. The Time Above metric also appears to correlate well with the number of aircraft noise events. These metrics do not, however, account for the absolute sound level of *individual* flight events. Accordingly, we recommend a new presentation of Sound Exposure Level (SEL) data (as presently used in the EXP calculation) to display the number of noise events produced by individual overflight operations.

##### 3.2 Technical Background

Individual overflight operations are of concern to the communities because some operations are well in excess of the steady-state background ambient level. The 1995 GEIR showed that ambient noise levels in the four HATS towns vary from below 40 dBA to the low 50's. The INM database indicates that several aircraft can produce levels in excess of 80 dBA on the ground well outside of the airfield proper. In the extreme cases of a Stage 2 Gulfstream business jet, a Boeing 727, or a military jet, levels in excess of 100 dBA may be generated, resulting in an absolute level increase of 40 to 60 dBA over the ambient for the duration of the overflight. These levels can exist even some distance away from the airfield, such as at the western edge of Concord and beyond.

The level of individual noise events is well expressed by the Sound Exposure Level (SEL), which is defined as the constant level which, if maintained for a period of one second, would deliver the same noise energy as the entire event. It is essentially a one-second  $L_{eq}$ , and is reported in dBA. As such, it is appropriate for short-duration events like an overflight; the one-second integration normalizes nominally different duration events. The Integrated Noise Model (INM) program, presently used by Massport, uses SEL data, and can plot an SEL contour for an individual flight track. A few SEL values were reported in the 1995 GEIR. Because the Sound Exposure Level is appropriate for quantifying individual noise events like aircraft flyovers, we have chosen to refer to its use in this metric presentation as the *Single Event Level* (i.e., both abbreviated SEL.)

There is considerable variability in individual noise events, since each flight operation is unique – varying by runway used, flight track followed, aircraft type, thrust setting, weather conditions, etc. Whereas the DNL *obscures* this variable nature by averaging (over time, geography, aircraft type, flight heading, etc.), we propose to draw attention to the *variation* by plotting the statistical distribution of SEL. By doing this, one can easily see how loud flyovers can be, and often they occur. We call this statistical plot the Single Event Level Distribution, or SEL/D.

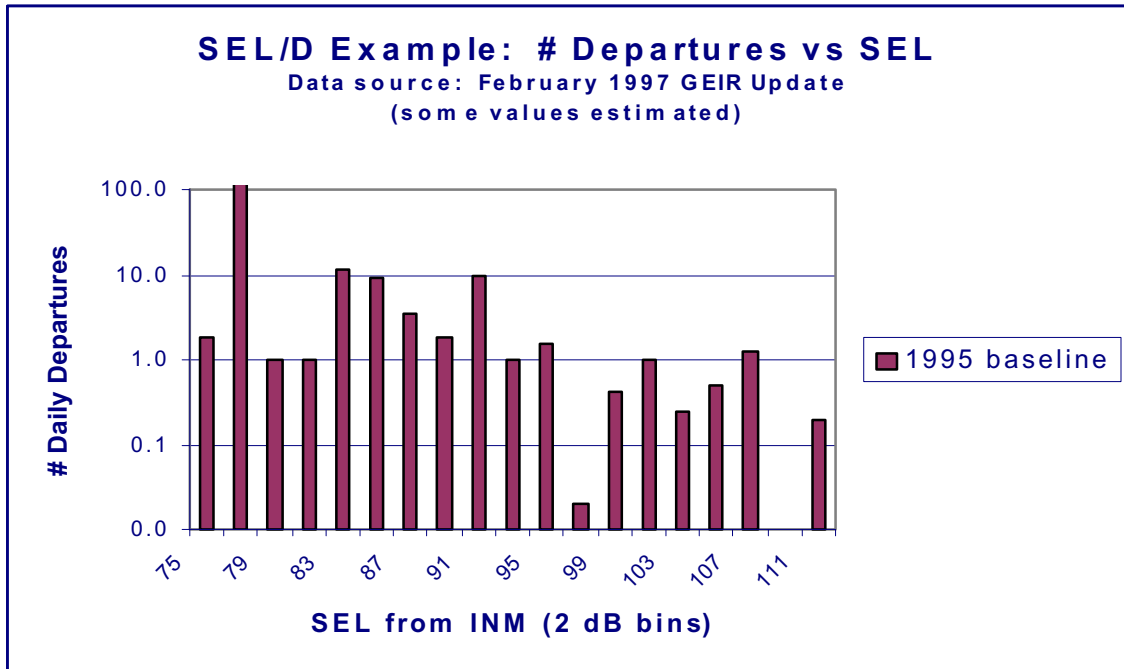
By making a bar graph of the count of the SEL of aircraft operations, with a bar for every 2 dBA above 90 dBA, a metric is created that clearly shows both the quantity and acoustic energy of the noisiest aircraft operations. This will simplify year-to-year comparisons and observation of trends in very loud events. Trends are clearly shown in ways that are easy to explain to the public, and so will enhance communications. For example, as noisy jets are replaced by quieter jets, the size of the high-dBA bars will drop linearly with the percentage shift to quieter aircraft.

It should be noted that SEL/D data does *not* come from direct measurement at the time the operations take place at Hanscom. Rather, the SEL values are contained in the EXP database, which is used in INM as currently used by Massport. (These database values result from actual measurements of aircraft under

standardized conditions.) Thus, the SEL/D presentation derives from combining the SEL values with data on operations, which Massport already compiles monthly.

### 3.3 Example SEL/D

The following example shows an SEL/D, using departure SEL data from the February 1995 Hanscom GEIR update. (The data are for the 1995 baseline.)



This type of plot is known in Statistics as a Histogram, or Statistical Distribution. Histograms are commonly used to present any quantity that varies in a large population, and are valuable in that they indicate much more than the average:

- The degree of data variation; (Are the noise levels of departures more-or-less the same, or do they vary widely?)
- Multiple “modes” of variation; (Are there distinct “humps” in the level distribution, indicating that different types of aircraft tend to cluster together in noise level?)
- Extremes in the data; (What is the lowest noise level generated? What is the highest?)
- Imbalances in the data; (We may find that noise levels have a “floor” at a particular low level, but extend, in low numbers, to very high values.)

### 3.4 How to Generate the SEL/D Metric

To create this SEL/D histogram, we start with departure SEL data from the INM database to order the aircraft groups from lowest to highest individual SEL – thus creating a list that orders aircraft types from quietest to noisiest on takeoff. (The same could be done for arrivals.) Then, we group the aircraft types into 2-decibel-wide “bins”. For example, here are the aircraft types that compose the bin centered on an SEL of 95 dBA (95 +/- 1 dBA):

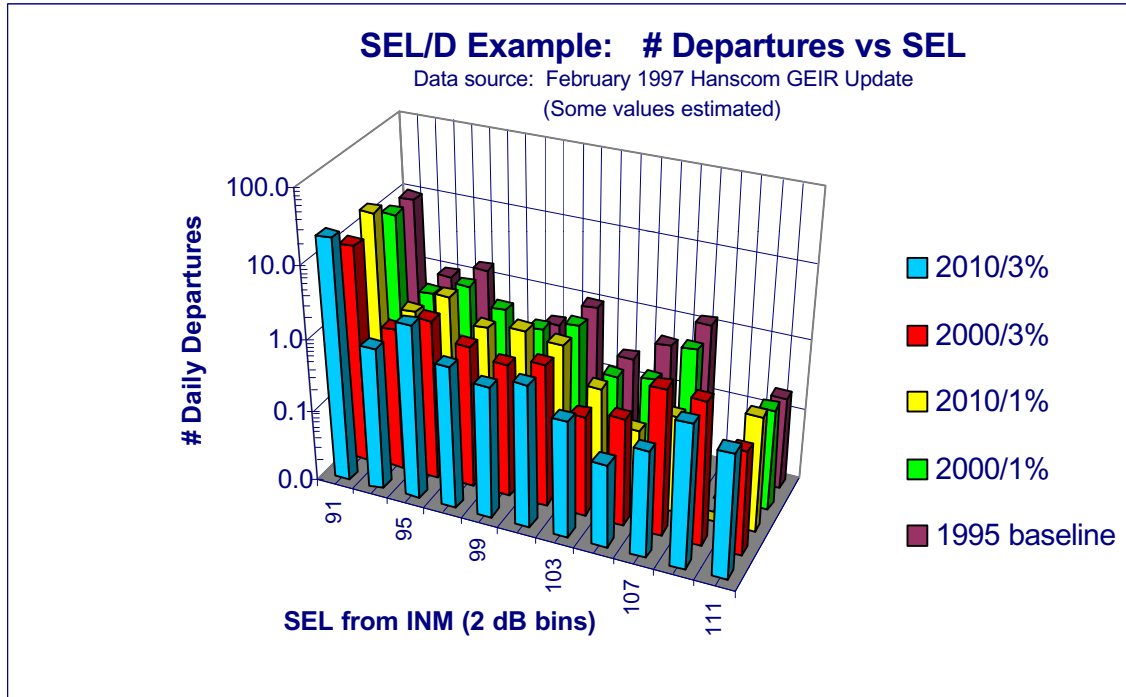


Group #	Aircraft Type	Departure SEL (dBA)
12	C140 (MILITARY)	95.5
4A	DA20, N265-80	95.4
4B	HU25	95.4
14B	CS, T-43 (MILITARY)	94.8
14A	DC-9	94.8
18B	C130 - HVY TURBOS (MILITARY)	94.2
18A	G159, CV60 - HVY TURBOS	94.2
28	DC3, CV24 - HVY TWIN PISTON	94.2

All the other aircraft types are contained within other SEL bins; the number of types in each bin will vary, depending on how many types have nearly equal SELs.

Once we have grouped the aircraft into these bins, we simply add the number of daily departures within each bin and plot the vertical bars for each bin.

To be most useful, it is helpful to see how the SEL levels vary with time. By plotting several SEL/D's in a "stacked" presentation, it is possible to add the time dimension. In the following example, five SEL/D histograms are plotted together to show level variation changes with time (or, in this case, with different growth scenarios.)

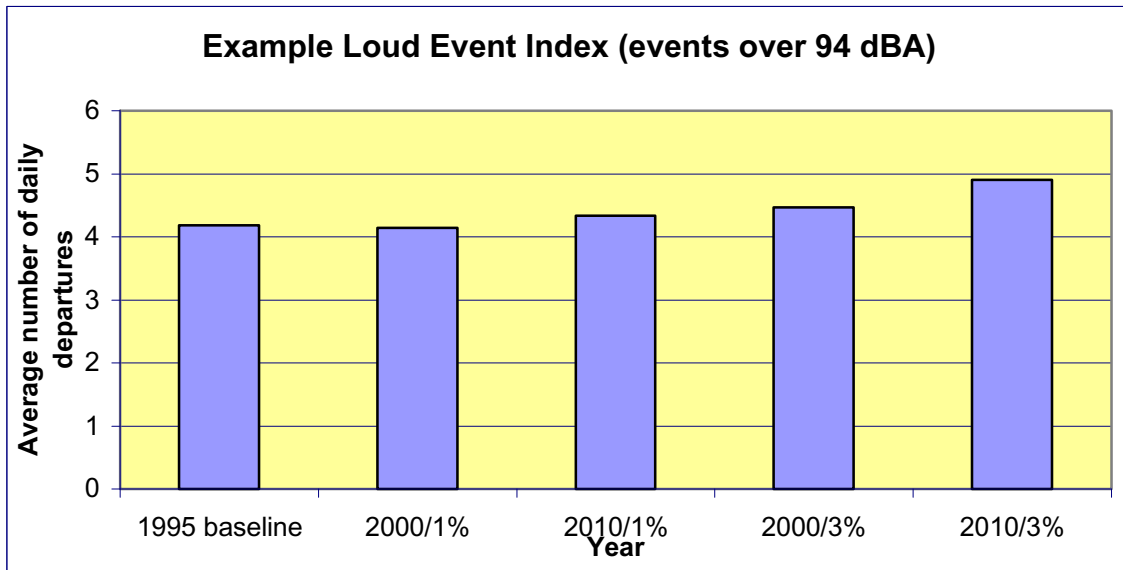


For clarity in the plot above, we have shown only the top end of the distribution because these loudest SELs are of the greatest concern. Why? Because community residents will hope to see, through improvements in technology and changes in fleet mix, a reduction in the number of loudest events. The SEL/D will show whether this is happening.

### 3.5 Application of SEL/D to Community Summary Metrics

Although its use is primarily analytical, the SEL/D can be extended to provide a much less detailed metric that can be more readily understood by the typical citizen. Once noise distribution trends have been established and understood, it is possible to aggregate SEL/D data to create a single number that varies with time.

The Loud Events Index is recommended in Recommendation 6 on Community Summary Metrics. To create the Loud Events Index, we simply count the total number of events above 94 dBA over the course of every month. We then plot these monthly values over time. Using the data from the example SEL/D plotted above, (data from 1997 GEIR Update) we obtain the graph shown below:



This graph clearly shows a trend that is easily understood, although we do not know if it effectively correlates to some community response to noise. The choice of 94 dBA is rather arbitrary; it corresponds roughly to a natural division between two modes (or “humps”) in the distribution of SELs – between quieter single engine aircraft and noisier turboprops and jets. Further work may be required to refine this metric and relate it to community response.

## TD4. TECHNICAL DISCUSSION: LINEAR DIMENSIONLESS METRIC

### Recommendation:

The Workgroup recommends that future GEIR Hanscom noise reports include a linear dimensionless metric (unlike the logarithmic decibel metric used for L<sub>dn</sub>) to show exposure to noise energy. We recommend that the Follow-up group described in Recommendation M1 continue to study the design of such a metric and methodology for implementation in the next GEIR.

### Discussion:

#### 4.1 Introduction

L<sub>dn</sub> is one of the most frequently used metrics for assessing community exposure to aviation noise, but it is a difficult metric to comprehend without special training in noise measurement and its validity has been questioned (see, for example, the 1997 Annual Report of Federal Interagency Committee on Aviation Noise, page 16). The main source of these difficulties is that, unlike most commonly used metrics (length, volume, weight, etc.) which are linearly related to a property of a physical object or phenomenon, L<sub>dn</sub> is both logarithmically related to aviation noise and an average of that noise energy over a day or a longer period of time.

This section contains an example of a candidate linear dimensionless metric. As with all other metrics recommended by the Noise Metrics Taskgroup, the proposed metric is intended to supplement and not replace L<sub>dn</sub>. It is simply a new way of communicating the same information embodied in L<sub>dn</sub> and, in that respect, it has the same advantages and limitations as L<sub>dn</sub>. Even though a linear means of expressing aviation noise will improve the public's comprehension of the reported noise data, we propose that the follow-on group (described in Recommendation M1) study the advantages and disadvantages of such a metric to ensure the optimum implementation of a linear metric in the next GEIR. Therefore, the *particular* approach discussed in this section should be viewed as only one possible implementation, as opposed to the ultimate version of the recommended metric.

#### 4.2. Technical Issues

This section:

- Reviews the definition and current use of L<sub>dn</sub>;
- Discusses an alternatedisplay of the L<sub>dn</sub> information; and
- Illustrates the features of the alternate approach.

##### 4.2.1 Definition of L<sub>dn</sub>

The formula for calculating L<sub>dn</sub> (dB) is:

$$Ldn = 10 \log_{10} \left( \frac{P_{dnAviation}^2}{P_{ref}^2} \right) \quad (1)$$

$$= 10 \log_{10} \left( \frac{\frac{15}{24} \langle p^2(t) \rangle_{td} + \frac{9}{24} \langle 10p^2(t) \rangle_{tn}}{P_{ref}^2} \right) \quad (2)$$

where:

- p(t) = instantaneous sound pressure
- t = time
- td = 15 hour period (7:00 am - 10:00 p.m.)
- tn = 9 hour period (10:00 p.m. - 7:00 am)
- log<sub>10</sub> = logarithm to the base 10
- P<sub>dnAviation</sub> = day-night averaged Aviation sound pressure

$p_{ref}$  = reference sound pressure = 20  $\mu$ Pa (microPascal)

$\langle Q(t) \rangle_T$   
= average value of Q; averaged over time period T

The formulae in Equation 1 and 2 are complicated, and difficult to understand and interpret. Therefore, we investigated a simpler way to present the same information.

This example metric simplifies the presentation of the information by using a linear scale, which, for example, represents the effect of two noise events as the as the simple sum of the individual effects.

#### 4.2.2 Use of $L_{dn}$ an Aviation Noise Metric

$L_{dn}$  is one of the quantities as reported by noise monitoring systems installed around airports, and also a quantity calculated by the Integrated Noise Model (INM). Noise monitoring systems installed near airports collect data and calculate  $L_{dn}$  values. However, these systems include too few sensors to provide a comprehensive noise exposure map for the entire community surrounding the airport. Accordingly, the INM is used to "estimate"  $L_{dn}$  at locations around the airport where there are no sensors.

With most quantities, combinatorial effects are additive. For example, if one adds 50 lb. of sugar to another 50 lb. of sugar, one expects (and gets) 100 lb. of sugar (Figure 4.1a). This is not true of dB quantities. For example, consider a location exposed to  $L_{dn} = 50$  dB resulting exclusively (and hypothetically) from 10 identical operations per day (i.e., occurring under identical operational and environmental conditions such as: flight track, thrust, wind, temperature, etc.). Now increase the air traffic by an additional and identical 10 operations per day, which by themselves would have resulted in an  $L_{dn} = 50$  dB. The combined result of the 20 identical operations is not  $L_{dn}=100$  dB but  $L_{dn} = 53$  (!) dB (Figure 4.1b) because of how addition of sequential noise events works. This result is a direct consequence of  $L_{dn}$ 's logarithmic combination of two values, which makes metrics based on decibels (dB), such as  $L_{dn}$ , difficult for many people to comprehend.

#### 4.2.3 A possible linear metric

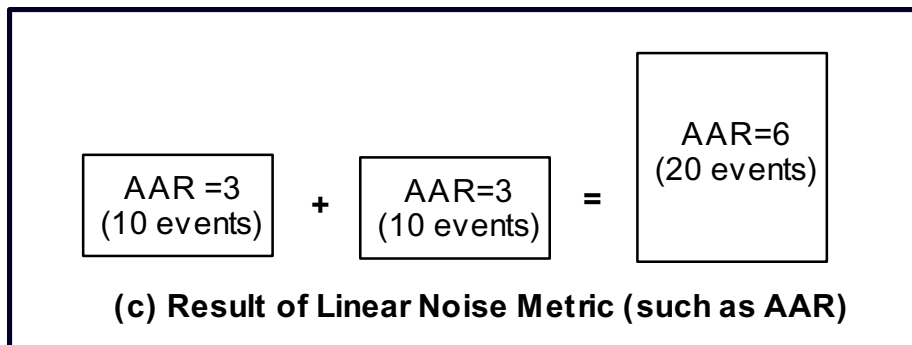
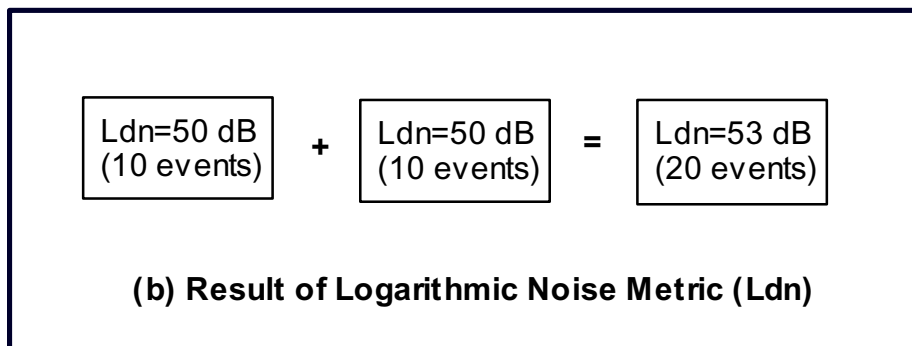
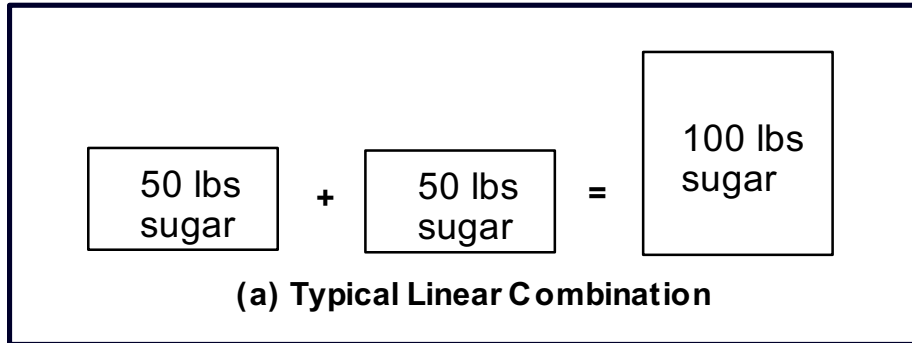
It is possible to report noise exposure noise exposure in a linear, rather than logarithmic, form, and to relate aviation to an ambient noise level as a ratio (with a potential name such as Aviation-to-Ambient Ratio, or AAR)

$$AAR = (\text{Aviation noise})/(\text{Ambient noise}) = \frac{p_{dnAviation}^2}{p_{refAmbient}^2} \quad (3)$$

- The numerator of the ratio is the aviation noise (in units of sound pressure squared), as averaged and day/night-weighted by the procedure used to derive  $L_{dn}$ . It is identical to the numerator of the Equation 1 fraction, i.e., it is the same quantity derived by the  $L_{dn}$  algorithm but prior to logarithmic conversion by  $L_{dn}$
- The denominator of the ratio is a reference ambient noise (also in units of sound pressure squared). The ambient noise level is routinely approximated by  $L_{90}$  (the measured level exceeded 90% of the time), as listed in the 1995 GEIR. The  $L_{90}$  level recorded by the six monitoring stations suggested an ambient level between 40 and 45 dBA (Table 2.3-8 of the 1995 GEIR). In the preliminary study of the sample linear metric, we assumed a Reference Ambient level for the Hanscom four-town area of  $L_{ref\_amb} = 45$  dBA, corresponding to a

$$p_{refAmbient} = \text{Reference Ambient sound pressure} = 3.6 \text{ mPa (milliPascal)}$$

- The results of this example metric are expressed in terms of ratios, and can be plotted at user selected intervals.
- The lowest contour to be used has a value of 1, i.e., it corresponds to an aviation noise contribution equal to the reference ambient noise contribution.



**FIGURE 4.1 - Comparison of Combination of Linear and Logarithmic Quantities**

Future adaptation of a linear metric, such as the AAR, should include additional and validated information on the appropriate value of  $L_{ref\_amb}$ .

#### **4.2.4 Comparison of Linear Metric to $L_{dn}$**

Within each of the four HATS towns,  $L_{dn}$  varies from about 45 dBA up to about 60 dBA. Within the same areas, the ratio calculation varies from 1 to 30.

It should be reiterated that this example linear metric and  $L_{dn}$  express ratios of acoustic energy (noise) in different forms (linear vs. logarithmic). These ratios should not be confused with the loudness ratios that are used in some non-aviation applications to express human perception of loudness of similar discrete noise events. While such a metric (loudness) may be appropriate for, say, automobile applications, it is not suitable for aviation noise because of the long time averaging over many and dissimilar noise events, including periods of no events. For example, a linear ratio of 3 cannot be interpreted as 3 times greater loudness; it simply means 3 times more aviation noise energy than ambient noise energy. Similarly, in some cases a linear ratio doubling from 3 to 6 may simply indicate *twice as many audible aviation events* rather than twice as much loudness.

## **TD 5. TECHNICAL DISCUSSION: Expanded Discussion of DNL**

### **Recommendation:**

The Workgroup recommends that the discussion of the noise impact on residential use in future GEIRs include reference to the EPA level of 55 dB DNL (EPA Publication #319, "Protective Noise Levels", 1978) and avoid the implication that DNL of less than 65 dB DNL (the FAA mitigation threshold) has no impact.

### **Discussion:**

#### **5.0 Introduction**

During the 1995 GEIR review process, we found that the DNL was difficult to explain, was presented in units (dB) that are easy to confuse with measures of loudness, and invited a wide range of interpretations.

This section discusses the reasons for recommending the expansion of discussions of DNL in future GEIRs. It outlines the shortcomings of the current approach, and shows why changes in current explanations will help to supplement and clarify the information provided.

#### **5.1 Technical Background**

The Natural Resources Defense Council has effectively summarized the primary defects with the Ldn/DNL metric:

"...The FAA's use of the DNL metric and the 65 dB DNL threshold is flawed in two significant respects:

- 1) as an average noise measurement, the DNL methodology masks the tremendous number of single noise events of noise that are the most significant aspect of aircraft noise, and
- 2) by setting a compatibility threshold of 65 dB DNL, the FAA underestimates the number of people who are annoyed or impacted by aircraft noise and ignores evidence that would require analysis and mitigation on a case-by-case basis. Until the FAA noise methodology incorporates these factors into its analysis, it will continue to misread community annoyance . . . "

- "Under the Flight Path" NRDC 1997

The averaging problem and the 65 dB threshold problem are discussed below.

##### **5.1.1 The Averaging Problem**

A key problem in deciding on metrics relates to the way different people in different locations are affected by noise. Some, especially those far away from the field, receive most noise impact from a few events that greatly exceed the ambient noise level. Others, such as those close to the field, are affected by the sheer number of events - even those that are not as noisy.

A deficiency of the FAA-sanctioned noise metric, the Day-Night Noise Level (DNL or Ldn), is that it integrates the total acoustic energy from a large number of discrete events over an entire day. A few noisy events count the same as a much larger number of relatively quiet events. Thus, one can reduce the Ldn but increase the number of aircraft operations, if noisy aircraft are replaced with quieter ones (e.g., Stage 3 jets for Stage 2 jets). This would satisfy those annoyed by a few loud overflights, but would probably worsen the situation for those bothered by the frequency of audible overflights. For example, the expert review panel on noise for the 1994 Seattle Tacoma Airport pointed out that a DNL reduction due to aircraft mix changes from 70 dB to 67 dB would be barely noticeable, but the same reduction in DNL could be obtained by cutting the number of operations in half, and this would be clearly noticeable to everyone. We found that one business jet generates approximately the same contribution to DNL as do 2000 single engine aircraft. However, people on the ground will probably feel that there is a greater impact from 2000 single engine overflights than from a single business jet overflight.

This defect reduces the effectiveness of DNL as a gauge of the effects of aviation noise in an environment, such as Hanscom Field, that is subject to a mix of disparate aircraft types.

### **5.1.2 Interpreting the Ldn - 65dB Threshold**

The FAA defines areas subject to DNL of greater than 65dB to be "incompatible with residential land use", and such affected areas may be eligible for noise mitigation funding. The Hanscom Field GEIR discusses the DNL only in relation to the Ldn 65dB mitigation threshold. This makes it appear that the FAA and the GEIR don't recognize that citizens experiencing less than 65dB DNL are impacted by the airport, and is contrary to everyday experience. The concern about properly interpreting Ldn and characterizing noise aviation impacts is not unique to Hanscom. In 1993, several federal agencies established a committee known as Federal Interagency Committee on Aviation Noise, or FICAN, which stated its objectives:

- A reexamination of Day-Night Average Sound Level (or DNL) as the primary metric for describing noise,
- An evaluation of the dose-response relationship between DNL and its effects on people (quantified as percent of people highly annoyed)
- The appropriateness of the noise criteria used to define compatibility with different land uses.

Other regulatory bodies have suggested different levels as appropriate measures of impact. The U.S. EPA has established through reports and administrative comments that 55dB is the noise limit that is satisfactory to protect human health and welfare in a residential setting:

“Outdoor yearly levels on the Ldn [DNL] scale are sufficient to protect public health and welfare if they do not exceed 55dB in sensitive areas (residences, schools, and hospitals). Inside buildings, yearly levels on the Ldn scale are sufficient to protect public health and welfare if they do not exceed 45dB. Maintaining 55dB Ldn outdoors should ensure adequate protection for indoor living.”

(EPA Publication #319, "Protective Noise Levels", 1978)

### **5.2 Conclusion on Ldn**

The DNL is a metric that is deficient in a number of areas, and is likely to be a poor predictor of community response and impact at an airport with a diverse and changing fleet mix such as Hanscom Field. Nevertheless, it has been studied extensively, has basis in policy and law, and is widely used. Therefore, its use should be continued at Hanscom Field provided that it is supplemented by other metrics, such as those recommended in this report. The impact of DNL values below 65 dBA should be clarified, both for the general population and for the Minuteman National Park.



## TD6. TECHNICAL DISCUSSION: COMMUNITY SUMMARY METRICS

### **Recommendation:**

The Workgroup recommends that future GEIRs and annual noise reports provide Community Summary Metrics - i.e., Monthly Loud Events Count, Area Impacted by Noise per EPA, and Area Experiencing 30 or more minutes per day of 55 dBA or greater Aircraft Noise. These three single-number measures are intended to be easy for people to understand and relate to their personal experience.

### **Discussion:**

In addition to the need to develop metrics that meet the technical requirements for appropriate metrics, there is also a need for metrics which can be used to effectively communicate with the public at large. These metrics should be a subset or summary of the more detailed metrics used for technical analysis.

Community summary metrics are not intended to replace other metrics. Their purpose is to facilitate communications and to improve Massport's credibility with the public. It is assumed that the public will not be familiar with the engineering principles of noise monitoring and will instead need to rely on a simplified heuristic model that has analogy in their everyday experience. For a metric involving community impact to be effective in communicating with the community it would ideally have the following attributes:

**Zero Value:** Ideally, the zero value for the metrics should equate to zero community impact. This is because in the absence of detailed understanding people assume that zero equates to the absence of the quantity being measured.

**Scale Linearity:** The scale of the metrics should be linear with the magnitude of the impact. This is because people naturally assume that a doubling of the perceived impact should be reflected in a doubling of the metric.

**Minimum Metrics:** If more than one metric is needed, the metrics should be reduced to a minimum in quantity and the purpose for each of the separate metrics should be expressible in a single sentence. This is to reduce the confusion that will arise with the use of too many metrics

**Relation to Experience:** Individual citizens should be able to relate the metrics to their personal situation or experience, so that they can use it to explain their past experience and predict their future experience. This is essential to allow the public acceptance of the metrics.

**Explanatory Title:** The title of the metric should explain the purpose of the metric in lay-language.

**Reference Values:** There should be reference values established on the metrics scale relating to impact. This is to allow a person attach meaning to the absolute value of the metric. For example on the Sound Pressure Level (SPL) scale : 40 dBA= whisper, 65 dBA=speech interference, 90 dBA= hearing damage for long term exposure, etc.

**Simple Numbers:** Whenever possible, the metrics should each be represented as a single number, and graph representations of the metric should be only trend lines vs. time. This is because other graphical forms such as scatter charts, histograms, or contours cannot be effectively communicated to the public in text or as trend descriptions.

The above attributes are in the main self-explanatory and can be achieved for the most part by the suggested Summary Metrics. However, there are two issues that require further clarification: **Relation to Experience** and **Scale Linearity**.

### **TD6.1.1 Relation to Experience**

People want to relate the metrics to their personal situation. We categorized three different classes of affected citizens who potentially have three different concerns with the noise associated with aircraft operations. These classes are concerned with:

**Noise exposure:** In this case, citizens are concerned with the noise impact of the louder aircraft operations or those smaller aircraft that infrequently fly directly overhead.

**Event frequency:** In this case, citizens are subject to a high volume of events and are concerned with the frequency and repetitive nature of distracting events. They may be concerned with outdoor activities, such as tourism or nature preserves. They are typically close to the airport or on major flight paths.

**Rare loud events:** In this case, citizens are primarily concerned with very loud events that represent a small fraction of operations. Sleep disturbance is a typical concern. These events are also a primary driver of registered complaints.

It is apparent that a great deal of community misunderstanding and concern regarding metrics results from these three different community perspectives. In order to satisfy the need to for the metrics to address these three classes of impacted citizens, we believe that at least three metrics are required.

- **Area Experiencing 30 or more minutes per day of 55 dBA or greater Aircraft Noise (TA 30 min/day @ 55 dB)**
- **Area Impacted by Noise per EPA (55 dB DNL Contour Area)**
- **Monthly Loud Events Count (Events per month > 94 dB SEL)**

In this way, impacted citizens can focus on the metric that best matches their perception of the problem.

**TD 6.1.2 Scale Linearity**

It was determined that DNL does not exhibit scale linearity from the point of view of the public, while some other metrics such as TA or Event Counts are linear. One sample approach to modifying DNL to achieve the attribute of scale linearity was developed during this phase and is discussed in Recommendation 4. We also identified another means to satisfy the linearity objective for inherently non-linear metrics like DNL by using land areas. Specifically, to generate a linear summary metric of a non-linear acoustic measurement for citizens, we recommend that the data be presented in terms of land area affected by a defined sound exposure (such as 55 dB DNL). The use of land area for communicating DNL to the public also satisfies a number of the other requirements for effective communication with the public as described below.

**TD 6.2 SUMMARY METRICS**

We recommend three community summary metrics which, we believe, satisfy the criteria of appropriateness identified above. These are:

<b>Metric</b>	<b>Source (how computed)</b>	<b>Include In</b>
Area Experiencing 30 or more minutes per day of 55 dBA or greater Aircraft Noise.	Area of 30 minute contour for Time Above 55dB	GEIR, Annual Noise Reports
Area Impacted by Noise per EPA	Area of 55dB DNL contour	GEIR, Annual Noise Reports
Monthly Loud Events Count	Events (count) per month > 94dB departure SEL from EXP database	GEIR, Annual, Monthly Hanscom Noise Reports

## TD7. TECHNICAL DISCUSSION: NOISE MODELING ASSUMPTIONS

### Recommendation:

We recommend that whenever data derived from INM modeling are presented, documentation be supplied including a detailed list of the assumptions and model parameters selected by the Massport noise consultants for input to the INM.

### Discussion:

The prime aviation noise model that was used in the 1995 Hanscom GEIR Update to evaluate aircraft noise impacts in the four-town area was the Integrated Noise Model (INM). Members of the Noise Workgroup attended a presentation on the INM, and have reviewed the INM User's Guide of December 1996 (FAA, INM Version 5.1).

We identified some modeling assumptions which we believe may have serious effect on the INM model results and we find that the nature of the assumptions have not been clearly communicated in the GEIR. In some of the examples provided in the recommendation the issues are self-evident; however, in the cases of Flight Tracks and Profiles, Temperature, and Takeoff Weight, more explanation is required. Additional Technical Discussion is provided below for these cases.

#### TD7.1 Flight Tracks and Profiles

INM is *an average value model*, and requires that "flight profiles and tracks must be modeled realistically". However, standard INM departure profile models have *all* aircraft climbing continuously to 10,000 feet above field elevation (Guide p. 2-3, item 5). This is somewhat unrealistic for Hanscom with its many "touch and go" operations, and for aircraft taking off east in the direction of Logan, because of the airspace restrictions in that direction. Indeed, INM Version 5.1 has two generic profiles specifically to model "touch-and-go" (TOG) and circuit flight" (CIR) operations (INM User's Guide, p. 2-5, Item 5). It is unclear whether or not, and to what extent, if any, the GEIR modeling used the TOG and CIR options available in the Version 5.1.

Moreover, the actual tracks may be modeled using just a few tracks (called "bundles") in selected locations and on a selected course. Considerable latitude is available to the analyst as to how bundling is done. For example, 100 tracks lined up with a 0° runway can be modeled by the analyst as:

- 100 tracks bundled at 0°, or
- 50 tracks bundled at 5° and 50 at -5°, or
- 50 tracks bundled at 0°, 25 bundled at 5°, and 25 at -5°, etc.

Clearly, the first of these examples would result in the highest  $L_{dn}$  along the 0° line. A sample noise levels variation corresponding to a specific set of conditions is illustrated later in Section TD8.

It is critical that future Hanscom GEIR updates explicitly specify the assumptions made in order to enable a valid year-to-year comparison of the results. The GEIR Report should also address the variability of predicted aviation noise levels expected from these alternative bundling options. In other words, if the actual track pattern  $L_{dn}$  contours were computed, how many dB would they deviate from the simplified bundled track results?

#### TD 7.2 Temperature

In addition, the results of the INM for a particular airport depend (among other factors) on the input assumption about the temperature and elevation of the airport. The elevation is certainly fixed for any given airport (Hanscom is close to sea level) but its temperature is clearly variable. The GEIR predictions are based on an assumed average temperature between 30 and 90 degrees. The standard INM data base assumes that aircraft are taking off at a standard-day temperature of 59° F (Guide p. 2-3, item 6).

However, the selection of an average temperature for modeling engine thrust requires a great deal of care because the frequency of aircraft flights has seasonal variations. It is noted that most aircraft fly in the daytime when temperatures at Hanscom, which is inland, are quite a bit higher than at night. Furthermore, aircraft activity data shows more operations in the summer (e.g., 55,393 operations in June, July and August of 1996) than in the winter (e.g., 29,839 operations in December, January and February 1996). Trial estimates of temperature weighted by the time of the day and the month, suggest that the average flight temperature (as opposed to the 24 hour average temperature) is closer to 65° F than to 59° F. Massport's noise consultant should make clear what effect the use of the actual temperature could be expected to have upon Ldn contours or other calculations presented.

### **TD 7.3 Takeoff Weight**

Another parameter that can influence the accuracy of the INM predictions is the takeoff weight of aircraft. The INM Manual instructs (p. 2-3, item 4) that is more accurate to use the actual average takeoff weight of the aircraft than the most often used stage length surrogate. Furthermore, the INM Manual advises that profile weight should be greater than 75% of the maximum gross landing weight (INM 5.1 Manual, p. 8-19). However, there was no indication as to what weight was used for the 1995 GEIR update, even though the specific choice could affect the results significantly. It is recommended that assumptions related to aircraft takeoff weight be explicitly stated in the future in order to ensure the validity of comparison of data from different years.

## **TD8. TECHNICAL DISCUSSION: MODELING ERRORS**

### **Recommendation:**

The Workgroup recommends that future GEIRs include: i) a section estimating the expected variation in results from the INM due to the use of different modeling assumptions. Massport should adopt a standard practice of reporting estimated variations as “error bands” when reporting modeled data; ii) the GEIRs should also include a comparison of the results of noise modeling to actual measured noise data, and explanations of differences.

### **Discussion:**

We identified some data and modeling assumptions, which we believe may result in significant effect on the numerical outputs from the INM. Additional Technical Discussion is provided below for some of the areas identified. The discussion below shows that it is not enough to simply express a result predicted from a model in terms of a single number (such as an average).

In addition, we believe that the results of INM modeling, whether DNL, Time Above or other, should be compared to available measured data (taken during the same time period as used in modeling), and discrepancies, if any, should be discussed.

### **TD8.1 Wind**

An example of simplifying assumptions (in mapping  $L_{dn}$  contours) is that analysts may presume that flight tracks recorded over a small time period (such as 60 days) are a valid representation of the flight tracks for the entire year (rather than use actual flight tracks recorded over the entire year). However, a look at 1997 Logan Airport area wind shows conclusively that wind patterns over any 60 days are not necessarily a realistic representation of average wind patterns over the year. The prevailing winds at Hanscom are from the West, but during summer it is primarily SW (Runway 23), and during winter NW (Runway 29). Consequently, runway use and flight tracks during 60 winter days may be quite different than during 60 summer days. Thus, average runway use over the year is not necessarily the same as average runway use over any 60 days.

### **TD8.2 Fleet Mix along Different Tracks**

During the Noise Workgroup sessions (not in the 1995 GEIR Report), Massport and their consultant HMMH stated that the INM used tracks as recorded, but did not associate actual aircraft types with the tracks. Instead, an equal proportion of aircraft of every type (group) was assumed along each "bundled" track. This assumption introduces a potential source of error.

The INM makes the simplifying assumption that each one of the bundled tracks has the same proportion of aircraft in each category. Thus, if 20% of all operations are jets and 80% propellers, each bundled track is modeled as having 20% of jets and 80% of propellers regardless of whether this assumption is supported by the actual data.

### **TD8.3 Estimation of Actual Noise Level Impact Adjustment due to Flight Track Bundling**

The flight track bundling used to simplify the Integrated Noise Model (INM) calculations may lead to a substantial variation between the predicted  $L_{dn}$  contours and actual measurements, particularly at some distance from the airfield (see, for example, Figure 2.3-14 in the 1995 GEIR Update.) Accordingly, it is imperative that predictions also include estimates of the uncertainty of the predicted results.

This section reviews an example involving modeling approximations and recommends procedures for estimating and reporting the associated uncertainty. The example discusses the potential variation of the predicted results due to flight track bundling. The discussion considers a simple case to illustrate the nature of the modeling approximations. The corresponding results do not necessarily represent the actual uncertainty for all the cases and from all aircraft types, but rather illustrates the “type and format of information” that should be developed by Massport and be included in future GEIR updates.

### TD8.3.1 Definition of Flight Track Bundling

Flight track bundling is a method used to minimize the amount of data that are fed into the INM and also the number of calculations performed by the INM. Essentially, the spatially distributed large number of actual tracks is replaced by a small number of groups of tracks (bundles). All planes in a bundle are assumed to have identical tracks.

Figure 1 illustrates the process of track bundling using an arbitrarily selected set of flight tracks and estimating the corresponding effects at two points, O1 and O2, on the ground. Initially, all flight tracks are assumed to pass directly above O1 and to the side of O2 (Figure 1a), with closest points of approach (CPA) R and 2R, respectively (Figure 1b). In this example, track bundling divides the flights into two equal groups, G1 and G2 (Figure 1c), assuming that half of the flights make a left turn and the other half a right turn immediately after take-off. [Note: Actual bundling involves many more flights and several “bundles”. The small number of flights and bundles of this example are for the purpose of illustration only].

The (Figure 1c) track bundling artificially:

- Increases the separation of all flights from observer O1 (Figure 1d), resulting in a lower predicted aviation noise level for that location, and
- Reduces the separation of some flights from observer O2 (Figure 1d), resulting in a different predicted aviation noise level for that location

Since the predicted aviation noise at location O1 would be lower than actual, a resident near location O1 would have a false indication of the aviation noise at that location. Accordingly, in future GEIR updates, it is imperative that Massport also develop, tabulate, and display an estimate of the prediction uncertainty along with the “bundled model” results.

### TD8.3.2 Sample Estimation of Uncertainty due to Track Bundling

To illustrate the approximate magnitude of uncertainty due to track bundling, we estimate the potential noise level variation for the Figure 1 example. The estimation involves mathematics that is commonly used in acoustics. ***Area residents are not required to follow the indicated derivation but rather to focus on the results obtained with and without bundling for this one example.*** The relationships are presented mainly to clarify the approximate method used to Massport staff involved in the estimation of Hanscom Field noise levels. Actual estimations by Massport should be based on direct INM results obtained for representative sets of tracks with and without bundling.

For the purpose of illustration, we assume that the

- Flights are for a single class of aircraft under uniform conditions in order to separate and isolate the effect of bundling from other effects such as fleet mix changes or environmental conditions,
- initial single group of aircraft is divided into two equal bundles, one to the right and one to the left of observer, O1, and
- relative distances (CPA) between the observers O1 and O2 are given by the sketch of figures 1b and 1d

Furthermore, we assume that the day-night noise level contribution ( $L = L_{dn}$ ) from a bundle is related to the source strength and to the closest point of approach (CPA) through the following relationship

$$L = 10 \log_{10} \left( \frac{Q}{R^2} \right) + C \quad (1)$$

where:

- L =  $L_{dn}$  due to aviation
- Q = bundle source strength (proportional to number of aircraft in bundle)
- r = closest point of approach (CPA) between observer and bundle
- C = a constant
- $\log_{10}$  = logarithm to the base 10

It follows that the  $L_{dn}$  levels, L1B, L2B, L1A, and L2A (where the symbols 1, and 2 correspond to positions O1 and O2, respectively, and the symbols B, and A correspond to conditions “Before bundling” and “After bundling”, respectively), are given by

$$L1B = 10 \log_{10} \left( \frac{Q}{R^2} \right) + C = L_0 \quad (2)$$

$$L2B = 10 \log_{10} \left( \frac{Q}{(2R)^2} \right) + C = L_0 - 6 \quad (3)$$

$$L1A = 10 \log_{10} \left( \frac{Q/2}{(2R)^2} + \frac{Q/2}{(2R)^2} \right) + C = L_0 - 6 = L1B_0 - 6 \quad (4)$$

$$L2A = 10 \log_{10} \left( \frac{Q/2}{(R)^2} + \frac{Q/2}{(\sqrt{13}R)^2} \right) + C = L_0 - 2.7 = L2B + 3.3 \quad (5)$$

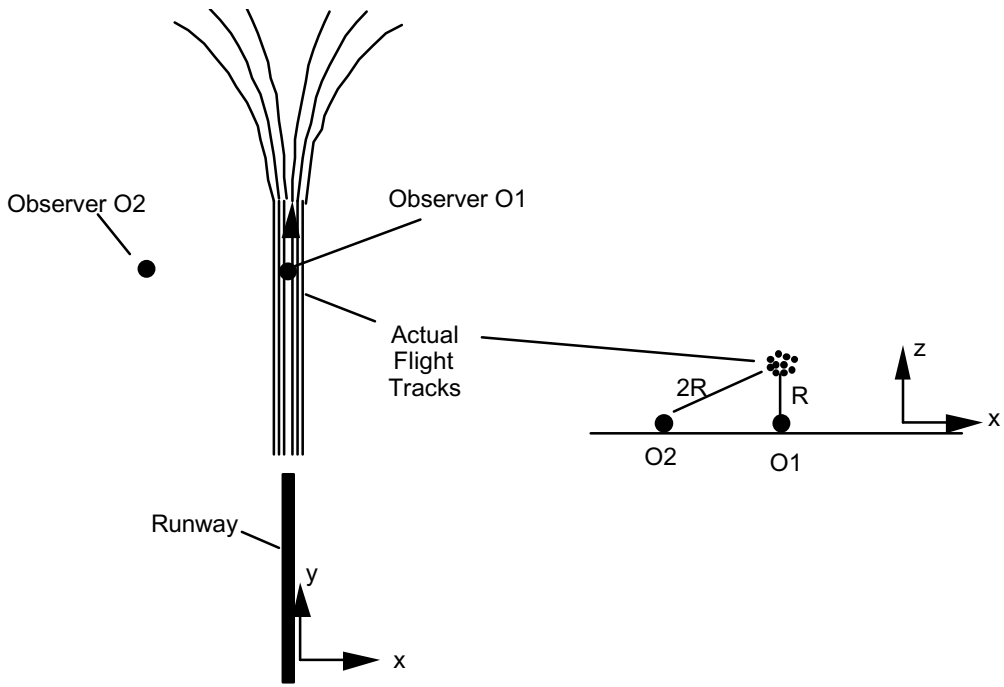
Equation 4 and 5 indicate that flight track bundling causes the predicted  $L_{dn}$  to appear

- 6 dB lower than actual at position O1, and
- 3.3 dB higher than actual at position O2

Thus, in this particular example, a resident in location O1 may base plans and decisions on the false information that the noise is 6 dB lower than actual at his location.

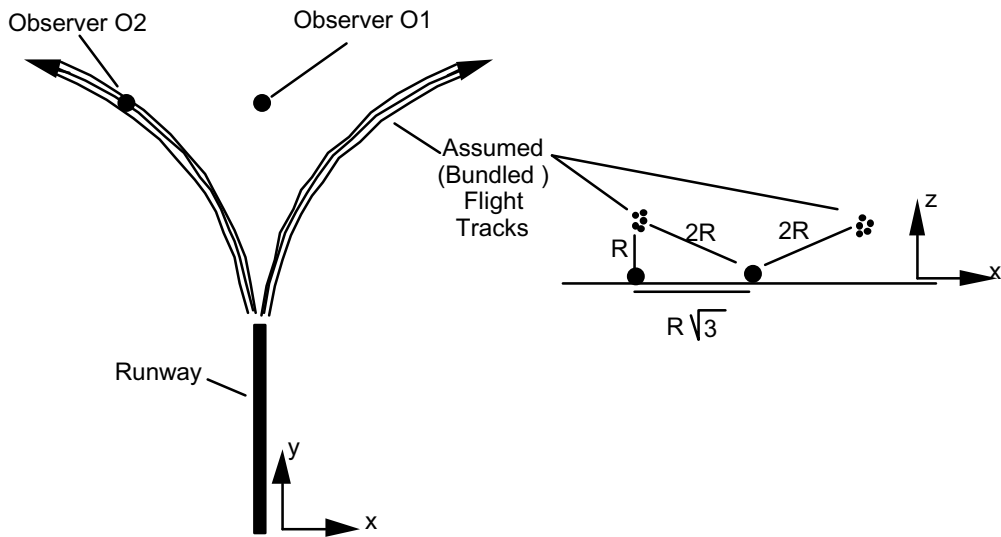
It should be noted that the above two error quantities (-6 and +3.3 dB) result from the Figure 1 geometry and from the assumptions listed above. Massport should obtain and report a representative noise variation distribution for the 4-town area over a broader range of operating/environmental conditions through the repeated use of the INM.

As to the second point in this Recommendation 8, it is self-evident that results of modeling can be considered as valid only, if they correlate closely with measured data taken at a number of sample points. If measured data at sample locations are found to verify the analytically predicted values of INM modeling, then we would have a positive validation that the INM predictions are a dependable model of what would be observed in real life.



(a) View from Above

(b) View along Runway



(c) View from Above

(d) View along Runway

**FIGURE 1- Representative Features Of Track Bundling.**



## TD9. TECHNICAL DISCUSSION: EXPECTED VARIATION FROM AVERAGE

### Recommendation:

The Workgroup recommends that future GEIRs include a section explaining the expected short-term variations in noise from the long-term average values.

### Discussion:

The daily variation in noise levels from the average values is very significant and is primarily caused by wind patterns. This section relates reported runway use to available wind pattern data for this area, and outlines the procedure for estimating noise level corrections that should be added to the predicted  $L_{dn}$  levels in order to account for the higher aviation noise impact during periods of exclusive runway use.

#### TD9.1 Actual Noise Level Impact Adjustment due to Wind Patterns (Runway Use)

Runway use is very much controlled by prevailing winds. Averaging the effect of aviation departures and arrivals over the entire year, results in a lower  $L_{dn}$  level per runway than the actual level registered on days that such a runway is used exclusively.

The currently reported  $L_{dn}$  levels are estimated by averaging the number of flights over the entire year (done separately by day, night, and runway). However, each Hanscom Field runway (5, 11, 23, and 29) tends to be used exclusively on some days of the year and not at all on other days. Runway usage is determined by wind direction, with takeoffs and landings being made into the wind. It follows that residents under a specific runway are exposed to essentially ambient noise on days the runway is not used, and to a much higher than reported  $L_{dn}$  on days the runway is used exclusively.

#### TD9.2 Sample Estimation of Uncertainty due to Exclusive Runway Use

The above discussion confirms that because of area wind patterns the Hanscom runways are used

- Nearly 100% of the time on some days, and
- little or not at all on some other days

In turn, this implies that the reported  $L_{dn}$ , obtained by noise averaging over the entire year, may be significantly lower than  $L_{dn 100\%}$ , registered only during days of 100% runway use. It is this latter figure that is worthwhile predicting and reporting because it is this noise level that causes area resident annoyance and complaints. Table 1 to provides a sample estimate of the difference between  $L_{dn 100\%}$  and  $L_{dn}$ . The first two columns of Table 1 show the percentage of runway use at Hanscom. Columns 3 and 4 combine the percentages for operations from either end of each runway. Thus, runways 5 and 23 account for 30% of all takeoffs and landings; and, runways 11 and 29 account for the remaining 70% of operations.

The noise averaging over the entire year means that the sound energy produced by runways 11 and 29 over 70% of days in a year, is spread over 100% days of the year. In other words it is diluted by a factor of  $100/70=1.4$  which is shown in the fifth column of Table 1 (“Increase of Operations Ratio (OR)”). This means that the sound energy on days with 100% use is 1.4 times higher. Similarly, the sound energy produced by runways 5 and diluted by a factor of  $100/30=3.3$ .

A noise level correction,  $L$ , that compensates for the above cited dilution may be estimated by using the following formula:

$$\begin{aligned}\Delta L &= L_{dn100\%} - L_{dn} \\ &= 10 \log_{10} \left( \frac{100\% \text{ runway use sound energy}}{\text{year average sound energy}} \right) = 10 \log_{10}(OR) \quad (1)\end{aligned}$$

Upon substitution of the  $OR = 1.4$  and  $3.3$  into Equation 1, we find that the corresponding correction levels are 5.2 and 1.5 dB, respectively, which are included in the sixth column of Table 1.

The important implication, the bottom line, of this sample estimation of correction levels is summarized in the last two columns of 4 which shows the associated impact on the  $L_{dn} = 55$  contours. Because of the correction, the  $L_{dn} = 55$  dB contour reported for runways 5 and 23 corresponds to an actual level of  $L_{dn} = 60.2$  dB; and the  $L_{dn} = 55$  dB contour reported for runways 11 and 29 corresponds to an actual level of  $L_{dn} = 56.5$  dB. This is a very significant disparity between reported and actual daily  $L_{dn}$  levels and it must be addressed and reported in future Hanscom Field GEIRs.

**TABLE 1 - CORRECTIONS TO OPERATIONS AND NOISE LEVELS  
FOR 100% RUNWAY USE**

Hanscom				Increase (Correction) in		Currently Reported Ldn (dB)	Potentially Corrected Ldn 100% (dB)
Runway No.	% Use per year	Runway Pairs	% Pair Use per year	Operations Ratio	Noise Level (dB)		
5	7						
23	23	5 & 23	30	3.3	5.2	55	60.2
11	26						
29	44	11 & 29	70	1.4	1.5	55	56.5

## TD10. Technical discussion: Maintaining Consistency across INM model changes

### **Recommendation:**

The Workgroup recommends that the next GEIR include a section documenting how changes in the FAA Integrated Noise Model data affect the predicted total noise exposure. 1987 is acceptable as a baseline year, provided that available data from 1978 onward be presented in all year-to-year comparisons..

### **Discussion:**

#### **TD10.1 Variation of EXP Values**

A comparison of 1996 Noise Exposure data by Aircraft Type (Appendix B of the December 1997 memorandum "1996 Exposure Levels at L. G. Hanscom Field") to similar 1985 data (Table E-1, page E-6, of the March 1988 Hanscom GEIR Update) revealed major differences in the reported Reference Departure SEL (for a location 15,000 ft from Brake Release). Specifically, the Reference Departure SEL (dB) for a few representative aircraft types were as follows:

C-500, C-501:	84.6 in 1985 (position 1);	86.8 in 1996 (position 1A)
LR-24, LR-25:	107.4 in 1985 (position 4);	104.3 in 1996 (position 5A)
G-2, G-3:	101.9 in 1985 (position 5);	107.5 in 1996 (position 7A)
C-140 (MIL):	105.3 in 1985 (position 8);	95.5 in 1996 (position 12)
C-141 (MIL):	109.2 in 1985 (position 10);	103.3 in 1996 (position 13)
C-5A (MIL):	117.6 in 1985 (position 12);	112.0 in 1996 (position 15B)

These are just a few examples. In general, in 1996 some of these numbers are higher and some are lower than in 1985. The SEL values that are picked affect the EXP. The Metrics and Standards subgroup has been informed by Massport that the SEL values for EXP are taken from the INM, and that the INM has been upgraded periodically over the past 15 years. In the past, Massport's EXP modeling has not been upgraded as often as the INM, although it has been done several times in order to use the best noise and performance data that is available at the time. Massport touched upon this issue in the 1995 GEIR Update Report (p. 2-93, Sec. 2.3.3.4) by stating: "In order to maintain consistency with noise contours and current FAA data, Massport intends to modify Reference Level SELs used in the computation of EXP to reflect the FAA's most current data". Indeed, the 1995 GEIR Report presents two tables that permit a comparison of the impacts of these changes to be evaluated between INM version 3.9 data and version 5.0 data (Tables 2.3.-9 and 2.3-10, pp. 2-93 and 2-94).

#### **TD10.2 Variations in DNL, TA and proper comparisons**

Massport's revision of the data and their intent to be consistent in presenting EXP data is appreciated. Along those lines, it is recommended that the same consistency be maintained for future GEIRs in order to enable valid year-to-year comparisons of  $L_{dn}$  contours, TA contours, and any other related metrics, such as those described in Section TD4. In other words, the current data should be reprocessed through the old INM version, in order to enable valid ("apples-to-apples") comparisons from year to year.

## **TD11. TECHNICAL DISCUSSION: RELOCATION OF NOISE MONITORING SITES**

### **Recommendation:**

The Workgroup recommends that three of the six permanent noise monitoring sites be relocated away from local high-level concentrated noise sources.

### **Applicability and Time Frame**

Since the equipment at the six noise monitoring sites already exists, relocation could be implemented as.

### **Discussion:**

The following measurement sites are affected by local acoustic anomalies, and are therefore inappropriate for characterizing the ambient:

#### **Site 34, DeAngelo Drive, Bedford**

This site is aligned with the northern end of Runway 5/23. It is situated adjacent to the sidewalk and street in a light industrial complex, near a cul-de-sac at the end of DeAngelo Drive. This site is heavily influenced by close traffic noise from local employers during rush hours, and thus is not truly indicative of the noise environment in residential areas. We recommend that this monitor be relocated radially outward from the end of Runway 5/23 a short distance into the nearby residential Bedford community.

#### **Site 35, Preston Court, Lexington**

Situated in the community off the eastern end of Runway 11/29, Site 35 is the more distant of the two monitors off this end of this runway. It is equipped with weather monitoring instruments. Its location near the crest of a steep hill creates two problems for accurate characterization of the Lexington residential acoustic environment. First, its location gives a commanding acoustic line-of-sight exposure to Route 128 (Interstate 95), which passes .25 mile to the west. Rt. 128 is the major roadway in the western suburbs, and thus contributes substantially to the background sound environment at this location. While 128 is undeniably a major non-aircraft related noise source, we believe this monitoring site is influenced unduly by the roadway, given its prominent hill location overlooking the highway.

The second problem with this site is that it may be strongly influenced by an unusual amount of additional automobile engine noise, as engines must rev to negotiate the steep hill. We recommend that this site be moved along the axis of the runway only a small distance west or east to move it from the crest of the hill.

#### **Site 36, Wastewater Treatment Plant, Concord**

This is the more distant of two monitors off the western end of Runway 11/29. Opposition from nearby residents prevented its being sited at the original choice of location near Black Duck Lane. It thus was sited on Town land by the wastewater plant. This location puts it about 1000 feet south of a direct line off the runway (were it farther north and on the runway line, it would be in the middle of the Concord River.)

There is a significant problem with this location. It is only a few feet from - and directly overlooks - the outflow spillway of the wastewater plant. The outflow spillway runs continuously, creating a unique and loud broadband noise source that is completely unrepresentative of the ambient noise environment in the area. The monitoring site must be moved - if possible into the residential community that originally rejected it. Even if it must remain on the wastewater plant site, it must be moved so as not to be dominated by the outflow spillway. (In any case, the river floodplain will prevent its being located directly on the axis of the runway.)

# ADOPTION AND SIGNATURE

22 SEPTEMBER, 1999

(SIGNATURE PAGE 2)

**APPENDIX 1**

**VOLUNTARY ABATEMENT PROCEDURES**

# Hanscom Field

## Proposed Voluntary Noise Abatement Procedures Piston Fixed Wing and Rotorcraft

### Introduction

The first Abatement recommendation made by the Hanscom Field Noise Workgroup was that there should be a set of voluntary noise abatement procedures developed by local pilots and operators. After acceptance of this recommendation by the Workgroup, Jeffrey Parker, a local pilot and Chair of the Abatement and Mitigation Taskgroup, took the initiative in assembling a team to formulate and recommend such procedures. Members of the team included:

Mike Goulian, Sr. Executive Flyers, Aerobatic Champion  
Dan Schraeger, Aviation Insurance Agency, Local pilot  
Ken MacDonald, Aviation Regulatory Consultant, Local Pilot  
Sara Arnold, Manager, Airport Administration, L.G. Hanscom Field  
Jim Mathieu, Manager, Airport Operations and Maintenance, L.G. Hanscom Field  
Tom Hoban, East Coast Aviation, Local Pilot  
Isabelle Plante, USAF Flight Training Center, Local Pilot  
Anne Umphrey, Local Rotary Wing Pilot  
Dr. Susan Wedel, Boston MedFlight, Local Rotary Wing Pilot

This team gathered input from other pilots and operators on the field and developed the set of procedures attached. The processes by which these may be adopted on a voluntary basis are now underway. Although not strictly a Workgroup activity, the development of these procedures is central to many of the Workgroup's Abatement Recommendations. The Workgroup thanks Dr. Parker and this team for their initiative and progress in carrying forward this project.



# Hanscom Field

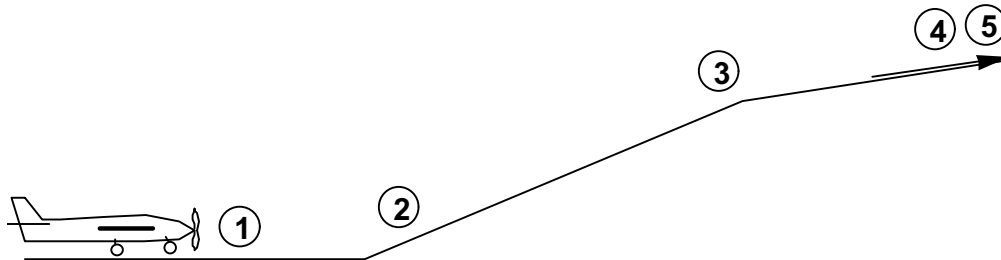
## Voluntary Noise Abatement Procedures

### Piston Fixed Wing Aircraft

To further our goal of reducing aircraft noise, we recommend that the following noise abatement procedures be followed whenever possible, consistent with safety.

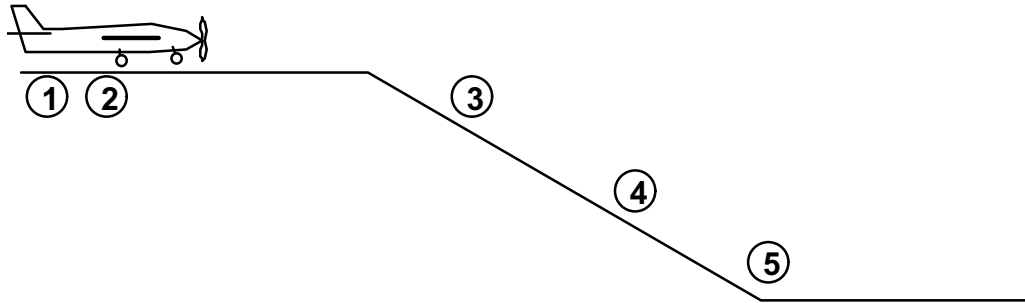
#### General Procedures

1. Avoid operations between the hours of 11:00 PM and 7:00 AM, whenever possible. A fee applies to all operations during this period.
2. Touch & goes are not permitted between the hours of 11:00 PM and 7:00 AM.
3. Touch & goes are not permitted at any time for aircraft exceeding 12500 pounds.
4. Stay current with manufacturer's noise abatement procedures specific to your aircraft. These procedures are often published as a supplement to the flight manual.



#### Departure Procedures

1. Use the full length of the runway for departures, avoiding intersection takeoffs.
2. After lift-off, climb out at the best rate-of-climb airspeed ( $V_Y$ ).
3. Set propeller to the "cruise-climb" power setting before reaching the airport boundary. Avoid flying over residential areas with the propeller set to high rpm.
4. When departing the pattern, unless otherwise directed by ATC, maintain runway heading to 1000 feet MSL before turning on course.
5. When staying in the airport traffic area,
  - climb straight ahead to 500 ft AGL before turning upwind.
  - maintain your traffic pattern as close to the runway as possible.
  - stay at pattern altitude as long as practical.
  - avoid extending your pattern over residential areas.



### **Arrival Procedures**

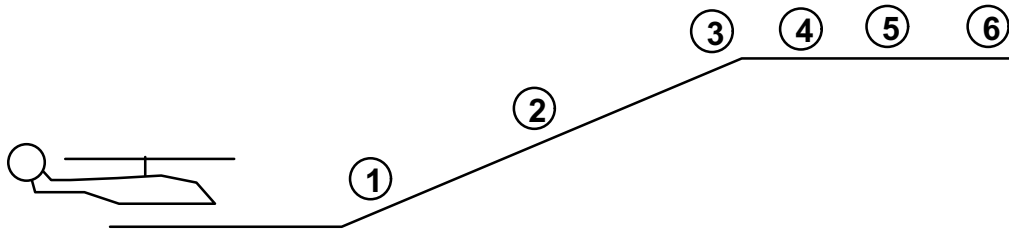
1. Straight-in approaches should maintain at least 1500 feet MSL until intercepting the VASI/PAPI glide path.
2. VFR aircraft should maintain at least 1500 feet MSL until 3 miles from the airport.
3. On final approach, stay on or above the VASI/PAPI glide path until crossing the airport threshold.
4. Set the propeller to high rpm on short final, after making your final power setting.
5. When practicing touch & goes, touch down within 1000 feet of the runway threshold.

# Hanscom Field Voluntary Noise Abatement Procedures Helicopters

To further our goal of reducing aircraft noise, we recommend that the following noise abatement procedures be followed whenever possible, consistent with safety.

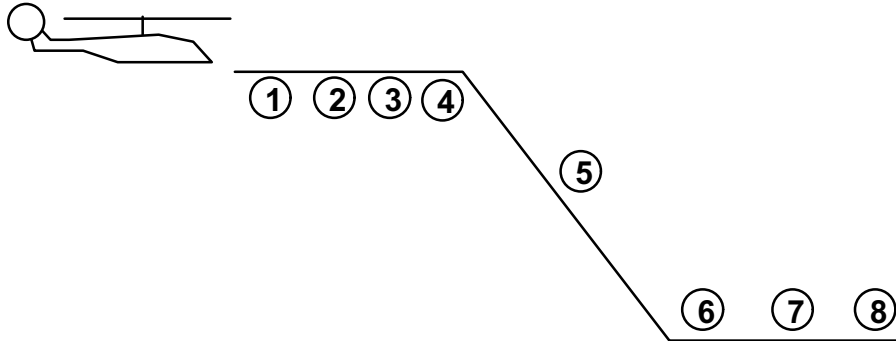
## General Procedures

1. Avoid operations between the hours of 11:00 PM and 7:00 AM, whenever possible. A fee applies to all operations during this period.
2. Touch & goes are not permitted between the hours of 11:00 PM and 7:00 AM.
3. Touch & goes are not permitted at any time for aircraft exceeding 12500 pounds.
4. Stay current with manufacturer's noise abatement procedures specific to your helicopter. These procedures are often published as a supplement to the flight manual.



## Departure Procedures

1. Climb at the best rate in order to reach altitude as quickly as possible. Avoid maximum power climbs.
2. Make a smooth transition to forward flight.
3. Avoid residential areas when departing the airport traffic area. Operate over surface routes such as highways whenever possible.
4. Fly as high as practical.
5. Vary the route if possible.
6. When staying in the airport traffic area,
  - maintain your traffic pattern as close to the runway as possible.
  - avoid extending over residential areas.



### **Arrival Procedures**

1. Fly as high as practical.
2. Vary the route if possible.
3. Avoid sharp maneuvers such as rapid high "G" turns.
4. Reduce airspeed below max cruising speed to minimize blade slap.
5. Use steepest glide slope consistent with safety.
6. Make approaches directly to taxiways or ramps.
7. Minimize time spent hovering. When hovering, attempt to turn the helicopter's tail towards noise sensitive areas.
8. When practicing touch & goes, make approaches to taxiways or grass areas as far from noise sensitive areas as possible.

**APPENDIX 2**

**SAMPLES OF TIME-ABOVE CONTOURS**

**From:** [Mark Rubman](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 12:34:26 PM

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Public Comment for:  
EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

I am writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. As a resident of the surrounding community, I am deeply concerned about the environmental impact of increased air traffic and the harm it will cause to our daily lives.

Increased air traffic from the expanded airport will result in higher emissions of harmful pollutants, including greenhouse gases, nitrogen oxides, particulate matter, and lead from aircraft fuel. These emissions will contribute to air pollution and further harm the environment. The expansion will also lead to increased aircraft noise at all hours of the day and night.

Given these negative externalities, it is only fair that the surrounding community be compensated for the harm caused by the airport expansion. This compensation could include, but is not limited to, funding for soundproofing of homes, financial compensation for decreased property values, and programs to mitigate the effects of increased pollution on public health.

I request that you reconsider this proposal and take into account the negative impact it will have on the community and the environment. Instead of expanding the airport, I strongly urge you to focus on finding alternative solutions that address the growing demand for travel while minimizing the impact on the environment. Investing in more sustainable forms of transportation, such as trains and electric vehicles, is a better way to reduce the environmental impact of air travel and protect our planet for future generations.

I strongly urge you to prioritize the well-being of the community and the environment before moving forward with this proposal. There will be a limited number of people who will benefit from this, however a larger number will be harmed. Residents should be fairly compensated for harms caused by the expansion.

Sincerely,

Mark Rubman  
308 Holden Wood RD  
Concord MA

978 254 3556

**From:** [mark.sutherland](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** no new hangers at Hanscom  
**Date:** Tuesday, February 14, 2023 2:09:21 PM

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Dear Sir - I am very much against the expansion of 27 new hangers at Hansom AFB. As someone who has lived nearby for the last 20 years, I have experienced a steady increase in air traffic. The last thing we need is more ! The noise & air pollution are already a hazard to the health of the surrounding communities & ecosystems. In a time of increasing atmospheric CO2 levels & dangerous global warming - not much for winter this year- it would only be sensible to find ways to reduce air traffic - not increase it !  
27 new hangers at Hascom is an unnecessary hazard & should not be approved!

Mark Sutherland  
99 Elm Brook Lane  
Concord MA 01742



**From:** [Mary Kostman](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** "RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF"  
**Date:** Tuesday, February 14, 2023 10:49:18 PM

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A private jet business is premium traffic at a huge environmental cost to all of us collectively. The solar panels and other energy-saving features planned for the buildings will not negate the extraordinary emissions impact of the jet trips themselves. The issue is "hyperlocal," because a Massport facility in our midst will single-handedly undo much of the progress we have made in carbon elimination.

Quoting Bob Domnitz of Lincoln, "the airport's 1978 master plan states that acquisition of additional land "would be considered only in instances when it essential to preclude major incompatible development." The land swap, he said, violates that commitment. "Can Massport just ignore its own master plan whenever it chooses to do so?"

Planning Board Chair Steve Hagan asked about increasing demand on electricity and the possible need for a substation. The growth in electric airplanes "is going to provide quite a power draw. Do you need a substation in the future? We want to know estimates on power draw as you open and in the future."

Yours truly,  
Mary Kostman  
131 Tower Road  
Lincoln MA 01773

Sent from my iPhone

**From:** [mary.steck](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** No Expansion at Hanscom  
**Date:** Tuesday, February 14, 2023 9:46:37 AM

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I live at the Battle Road Farm (BRF) community in Lincoln, adjacent to Hanscom Field. I am opposed to this expansion of Hanscom for many reasons:

- A. Environmental Justice- cancer rates are already significantly higher in our BRF neighborhood
- B. Quality of life in BRF has decreased dramatically with increased air traffic over the past 2 years noise pollution, jet fuel, traffic, environmental degradation including dying trees

In detail:

(1) Destruction and disturbance of green space and habitat. The Hanscom area is home to a great many birds and other creatures that would be disturbed by, and in some cases displaced by, the construction of this project and later operation. Replacing trees and grass with acres of additional asphalt will add to heat experienced by Hanscom's neighbors, including my family, in the summer months.

(2) Noise and fumes. I walk, run, and ski in Minuteman National Historical Park most days of the year. The park is visited by thousands of residents and tourists each year, during all four seasons. As it is, I and other users regularly experience noise and fumes from airplanes. An expanded Hanscom will make our outdoor activities less healthy. I expect that the same is true with Great Meadows, which is directly in the flight path of many Hanscom planes.

(3) Added fuel delivery from the Lincoln side of Hanscom. According to the recent public hearing, jets using the new development will be fueled near the existing hangars on the south side of Hanscom, which abut my neighborhood in Lincoln. This will increase fuel deliveries, and therefore traffic, on the access road adjacent to Battle Road Farm.

(4) No -- or very limited -- economic or other benefit to surrounding residents. Unlike another type of transportation project such as a commuter rail stop or bus hub, the disturbance created by a Hanscom expansion does not have any mitigating benefit most of us -- including my neighbors in Lincoln. We don't own or fly planes. The expansion will create few jobs, but increase traffic on the Hanscom access road that we use to travel to and from our homes. I urge MEPA and MassPort to consult closely with abutters in Lincoln and our neighboring towns and eliminate this project.

Respectfully,  
Mary Stechschulte



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

100 Cambridge Street 9th Floor Boston, MA 02114 • 617-292-5500

Maura T. Healey  
Governor

Kimberley Driscoll  
Lieutenant Governor

Rebecca L. Tepper  
Secretary

Gary Moran  
Acting Commissioner

February 14, 2023

Alexander Strycky  
Massachusetts Environmental Policy Act (MEPA) Office  
Office of Site Remediation and Restoration (HBS)  
100 Cambridge Street, Suite 900  
Boston, MA 02114-2023

Via e-mail to [alexander.strycky@mass.gov](mailto:alexander.strycky@mass.gov)

RE: L.G. Hanscom Field North Airfield Development Project  
Bedford, MA-EEA#16654

Dear Mr. Strycky:

Development of the L.G. Hanscom Field North Airfield Development is proposed for an area that is adjacent to and/or on two federal Superfund sites which are currently undergoing investigation and cleanup of hazardous materials and the emerging contaminants, per- and polyfluoroalkyl substances, (also known as PFAS) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The two sites, Hanscom Airfield/Air Force Base and the former Naval Weapons Industrial Reserve Plant are being investigated and remediated by the U.S. Airforce and Navy, respectively, with oversight by US EPA and MassDEP.

The Remote Public Consultation given by MEPA on February 6, 2023 presented proposed plans for the creation of 27 corporate jet hangars at the North Airfield, renovation of an existing hangar on the former Navy parcel (former Southern Flight Test Area (SFTA)), creation of 10 or more acres of impervious surface, construction of a jet fuel tank farm, and installation of a new stormwater drainage system. Disturbance or planned construction of the proposed development areas has the potential to impact investigations and cleanup currently underway at both Superfund sites and mobilize contaminants off property, namely toward Elm Brook affecting drinking water source areas located downgradient/downstream. Any future plans for design or construction should therefore take into consideration both Superfund sites and involve discussions with the Air Force, Navy, USEPA, and MassDEP, as appropriate, to ensure that the proposed project can occur in a manner that is protective of human health and the environment and does not interfere with ongoing cleanup remedies or future investigations.

Please feel free to contact me at [randi.augustine@mass.gov](mailto:randi.augustine@mass.gov) or 617-634-9612 with any questions.

Sincerely,

Randi Augustine  
Remedial Project Manager, Federal Facilities  
Hanscom Airfield/Hanscom AFB and Naval Weapons Industrial Reserve Plant  
MassDEP  
Bureau of Waste Site Cleanup  
100 Cambridge Street, Suite 900  
Boston, MA 02114  
617-634-9612 (mobile)  
[randi.augustine@mass.gov](mailto:randi.augustine@mass.gov)

cc: Diane Baxter, MassDEP  
Anni Loughlin, EPA  
Mike Daly, EPA  
Shawn Lowry, EPA  
Matt Greenberg, U.S. Air Force  
Eric Ross, U.S. Navy



Massport Community Advisory Committee  
300 Washington Street  
Brookline, MA 02445

February 14, 2023

The Honorable Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs  
Attn: Alex Strysky, MEPA Analyst, EEA #16654  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: L.G. Hanscom Field North Airfield Development – EEA #16654

Dear Secretary Tepper,

Please accept this comment letter from the Massachusetts Port Authority Community Advisory Committee (MCAC) on the ENF submitted by Runway Realty Ventures, LLC and North Airfield Ventures, LLC proposing the construction of 27 hangars and to renovate the existing Navy Hangar building at Hanscom Airfield (ENF) submitted on January 17, 2023. The MCAC is a legislatively created (See 2013 Mass. Acts Ch. 46, §§ 55, 82, as amended) committee comprised of representatives from thirty-five communities impacted by Massport's operations. Our statutory purpose is to provide oversight to Massport in order to minimize and mitigate the impacts that Massport has on our member communities. We submit these comments based on the information presented in the ENF and after consultation with some of the committee members from affected communities.

The proponent intends to build, operate, and maintain a master development of corporate hangars at Hanscom Field which will, according to the ENF, support current aviation activity and accommodate future demand. In addition to the 27 hangars, the project will add 408,000 SF of new building area. This is a large development that anticipates creating an additional 23.9 acres of impervious area. The ENF suggests that the project will result in environmental benefits associated with reduced air emissions by reducing overall aircraft trips. There is, however, very little evidence to support the claim that building these additional hangars will result in fewer “ferry flights” as they are called in the ENF. Without such evidence, it is impossible to ascertain the environmental impacts of the project. We would therefore ask that the DEIR provide more detailed information on the expected reduction in the number of flights, as well as what information these projections are based on.

The ENF further asserts that the project “will facilitate progress toward a carbon neutral aviation industry by incorporating infrastructure to support electric vehicles and equipment, electric aircraft, and sustainable aviation fuels...” (ENF transmittal letter, p.2). Here, too, the ENF contains little to no evidence of such progress. Massport has set a goal of carbon neutrality by 2031, ahead of the schedule for other state agencies. It is difficult to see how this project furthers progress towards that goal. In addition, Hanscom Field currently supports aviation that uses



**Massport Community Advisory Committee**

300 Washington Street  
Brookline, MA 02445

leaded aviation gas. It would certainly be a benefit if this practice were to end, as has been advocated by the surrounding communities. However, there is no analysis or explanation in the ENF of how this project will support the transition to sustainable fuel, nor to electric aircraft. The DEIR should correct this by providing data to support the claims made in the ENF.

Thank you for considering these comments. If you have any questions or concerns, please feel free to contact Aaron Toffler at [atoffler@massportcac.org](mailto:atoffler@massportcac.org), or at (617) 906-8853.

Thank you.

Aaron Toffler  
Executive Director, Massport Community Advisory Committee

cc: Stewart Dalzell  
Brad Washburn  
Thomas Butler

**From:** [Matthew Gasteier](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 4:13:54 PM

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Dear Mr. Strycky,

I am writing to express my strong opposition to the proposed expansion of the Hanscom Airfield. As a resident of the surrounding community, I am deeply concerned about the environmental impact of increased air traffic and the harm it will cause to our daily lives.

Increased air traffic from the expanded airport will result in higher emissions of harmful pollutants, including greenhouse gases, nitrogen oxides, particulate matter, and lead from aircraft fuel. These emissions will contribute to air pollution and further harm the environment. The expansion will also lead to increased aircraft noise at all hours of the day and night.

Given these negative externalities, it is only fair that the surrounding community be compensated for the harm caused by the airport expansion. This compensation could include, but is not limited to, funding for soundproofing of homes, financial compensation for decreased property values, and programs to mitigate the effects of increased pollution on public health.

I request that you reconsider this proposal and take into account the negative impact it will have on the community and the environment. Instead of expanding the airport, I strongly urge you to focus on finding alternative solutions that address the growing demand for travel while minimizing the impact on the environment. Investing in more sustainable forms of transportation, such as trains and electric vehicles, is a better way to reduce the environmental impact of air travel and protect our planet for future generations.

I strongly urge you to prioritize the well-being of the community and the environment before moving forward with this proposal. There will be a limited number of people who will benefit from this, however a larger number will be harmed. Residents should be fairly compensated for harms caused by the expansion.

Sincerely,  
Matthew Gasteier  
Concord, MA

**From:** [Melanie Coo](#)  
**To:** [Strysky, Alexander \(EEA\)](#); [mike.barrett@masenate.gov](mailto:mike.barrett@masenate.gov); [kenneth.gordon@mahouse.gov](mailto:kenneth.gordon@mahouse.gov)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 6:17:55 PM

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All,

As a mother and community member here in Concord, as well as long time member of Mothers Out Front, I am alarmed to learn about this development of additional hangers and all of the services that will come with it at Hanscom. In a time when we need to do everything possible to push against the worst effects of climate change, to see this many egregious impacts is just unconscionable. From increased fuel use, noise, air water and soil pollution, to loss of mature trees and expansion of asphalt - the horrendous heat island and polluted runoff that this will create is unacceptable.

The impact of private jets on our climate is so lopsided, to allow this development to proceed without consideration to the public health and environmental impacts is inexcusable.

In this day, to proceed with this level of construction without significant public input just wrecks.

Please, for the future of our children, reconsider allowing this to move forward. This project cannot proceed. It is amazingly out of step with Massachusetts being a leader in the fight against climate change.

Thank you.

---

Melanie Coo, RA  
COO Architects  
[melaniebcoo@gmail.com](mailto:melaniebcoo@gmail.com)  
cell: 617.306.2397



**From:** [Melinda Ballou](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Airport hangar expansion opposition  
**Date:** Tuesday, February 14, 2023 11:59:36 PM

---

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I urge opposition to the current plan to expand the expansion at Hanscom due to significant environmental and harmful impact to quality of life that would result.

Thank you for for your consideration.

Melinda Ballou  
14 Caribou St, Bedford, MA 01730



**The Commonwealth of Massachusetts**  
William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

February 14, 2023

Secretary Rebecca Tepper  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

ATTN: Alex Strysky, MEPA Office

RE: L.G. Hanscom Field North Airfield Development, 154 Hartwell Road, Bedford, MA;  
MHC# RC.72722, EEA# 16654

Dear Secretary Tepper:

Staff of the Massachusetts Historical Commission (MHC) have received the Environmental Notification Form (ENF) submitted for the above referenced project. Staff of the MHC have the following comments.

The proposed project consists of the construction of 27 purpose-built hangars for aircraft parking and storage on-airport. The proposed project also consists of the renovation of the existing Navy Hangar building.

The information provided indicates that the project will involve a land transfer between the proponent and Massport.

The project area is located to the north of the Minute Man National Historical Park, which is a National Historic Landmark and listed in the National Register of Historic Places.

The ENF does not identify on a map or a list the historic resources within the vicinity of the proposed project site. The scope of the Environmental Impact Report should include a historic resources assessment of historic properties within a ¼ mile of the project site.

MHC is concerned with potential visual, atmospheric, and audible elements that may impact historic resources. The ENF submitted does not contain an analysis or specific flight trip counts to support the claim that there will be a reduced number of flights in and out of Hanscom Airfield due to a decrease in "ferry flights." The MHC requests information on the number of flights in and out of Hanscom currently and the projected number of flights in and out of Hanscom based on the preferred alternative.

In addition, the project area is considered to be archaeologically sensitive due to the proximity of known historic period and ancient Native American archaeological sites. The MHC requests that an intensive (locational) archaeological survey (950 CMR 70) be conducted for the project. The archaeological survey should identify and locate significant historical or archaeological resources that may be affected by the proposed project. The results of the survey will provide information to assist in consultation to avoid or mitigate any adverse effects to significant historic and archaeological resources. The

archaeological survey must be conducted under a State Archaeologist's permit in compliance with the State Archaeologist's permit regulations (950 CMR 70).

Please note that these comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act (36 CFR 800), M.G.L. Chapter 9, sections 26-27C, (950 CMR 71.00) and MEPA (301 CMR 11), and do not serve as comments or approval regarding submissions for State or Federal Historic Rehabilitation Tax Credits. MHC's comments regarding the historic rehabilitation tax credit applications are submitted separately under those program regulations. Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,



Brona Simon  
State Historic Preservation Officer  
Executive Director  
State Archaeologist  
Massachusetts Historical Commission

xc: Michael Argiros, Runway Ventures, LLC/North Airfield Ventures, LLC  
Massport  
Richard Doucette, FAA  
Simone Monteleone, Minute Man National Historical Park  
Bedford Historical Commission  
Concord Historical Commission  
Lincoln Historical Commission  
Lexington Historical Commission

**From:** [Sara Levine](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Te:EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 5:27:06 PM

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As a resident of Lincoln who cherishes the health and well-being of the people and natural environments of our town and surrounding communities. I write to express my strong concerns over the expansion plans at Hanscom Field.

In reading about the proposal, I have become aware of many environmental and social equity reasons to halt the current plan until a broader coalition of community voices and concerns are included in the planning.

It is imperative that this project reflect the values of the immediate communities and addresses true environmental protection and social equity.

Thank you for your attention and moral leadership in this matter.

All the best,

Dr. Mitchell and Sara Levine

21 Bedford Lane  
Lincoln MA 01773

**From:** [Padma Choudry](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [mike.barrett@masenate.gov](mailto:mike.barrett@masenate.gov); [kenneth.gordon@mahouse.gov](mailto:kenneth.gordon@mahouse.gov)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 8:50:13 AM

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Dear Mr. Strysky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

Hanscom Field Advisory Commission (HFAC) provides continued communication and education among the communities surrounding Hanscom Field and Massport and acts as an advisory commission for review and reaction to decisions relating to Hanscom Field, including land use, noise abatement, and transportation needs.

While HFAC has been aware for some time that a project would be proposed for the Hanscom North Airfield area, this filing is the first time we have been given any details about the proposed project. For many months there was the appearance that the sale and renovation of the old Navy Hangar was completely distinct from the North Airfield project; now it appears these projects are combined and have always been guided by a single developer. The scale of this project and short comment timeframe make it difficult for area communities and this commission to fully understand the proposal in the allowed comment period.

The reactions to this project known to HFAC have all been negative. The surrounding towns are all in the process of submitting letters in opposition to the project and many community groups are also opposed. The Minute Man National Historical Park and Great Meadows National Wildlife Preserve have both raised concerns. A number of members of the state legislature have expressed concerns or opposition to this project. HFAC is not aware of any local groups supporting this project.

There are many environmental concerns that need to be addressed.

**1.** The overall impact of this airport on climate change is certain to be harmful. The reduction in ferry flights does not appear to be a significant mitigation of this impact. No data has been given to HFAC indicating how many ferry flights will be involved or the overall expected impact on climate change is expected from this project. HFAC requests data showing that the overall expected impact of this project will reduce climate change impacts, in alignment with regional goals to achieve net zero carbon emissions by 2050.

**2.** It is understood that the project includes a "fuel farm" despite being located over an aquifer. HFAC requests information proving that this fuel farm will not endanger the aquifer or local drinking water supplies.

**3.** There is a process under way to nationally phase out the use of leaded avgas. HFAC seeks assurance that none of the new hangar space will be used for aircraft operating on leaded avgas. HFAC seeks assurance that the new fuel farm will not include facilities to store or dispense leaded avgas (which is available from other FBOs at Hanscom Field).

4. The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase. HFAC requests data showing that this will not produce a net increase in jet aviation traffic in the region, accounting for any possible reduction in ferry flights.

5. The project includes plans to upgrade taxiway and runway capabilities to accommodate larger Group 4 aircraft. HFAC requests data showing that this addresses an established need for the regional transportation system.

6. There is a climate change emergency and every effort must be made to phase out and not expand use of fossil fuels. HFAC requests an explanation of how this project contributes to the solution of this emergency.

7. Aviation contributes to the climate change emergency. HFAC requests detailed plans for the use of sustainable airplane fuel or alternate fuels such as hydrogen or electric power by all aircraft supported by this project. HFAC expects that this project will demonstrate a monotonic reduction in greenhouse gas emissions to reach a net-zero target by 2030.

8. Hanscom Field adjoins Great Meadows National Wildlife Preserve. HFAC requests that this project be studied to show that protected wildlife in the national preserve will not be harmed.

9. Many significant historical sites are in the immediate vicinity. Aviation using Hanscom Field is supposed to avoid creating disturbance over Hartwell Tavern in the Minuteman National Historical Park. The "shot heard round the world" was fired at nearby Old North Bridge in Concord and the Lexington Battle Green is an important historical site and tourist attraction. HFAC requests information showing how these historical sites will not be harmed, including tourist revenue, educational opportunities and recreational enjoyment of the spaces.

10. The plan involves removal of approximately 34 acres of wooded area. HFAC requests information showing compensatory protection of an equivalent area elsewhere in the region. The overall impact of the proposed North Airfield/Old Navy Hangar projects is likely to cause regional harm and contribute to environmental projects in many ways. This large airport expansion is incompatible with the densely populated region. It is not expected that these harms can be mitigated in any way.

**Therefore, the Hanscom Field Advisory commission joins with regional town governments and citizen groups to oppose this project.**

Sincerely yours,  
Padma Choudry

**From:** [Pamela Nelson](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Fwd: Letter  
**Date:** Tuesday, February 14, 2023 3:50:20 PM

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Mr. Alexander Strycky  
MEPA Office 14 February 2023  
100 Cambridge St., Suite 900  
Boston, MA 02114  
[Alexander.Strycky@mass.gov](mailto:Alexander.Strycky@mass.gov)

RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strycky,

I am a resident of Bedford, MA and a mother of 2 children. We live near the north airfield side of Hanscom Airport in a neighborhood of single family homes with many families with children. My husband Scott and I strongly oppose this massive expansion project that will have a severe negative impact on the health and quality of life of children and families as well as the environment. Premium air travel for a few corporate elite at the expense of the health of our children, families and our environment is unconscionable.

This airport expansion is a colossal step backwards in our efforts against climate change, an existential threat to our planet. This expansion negates all the efforts Massachusetts has made towards reducing our carbon footprint. There is a vast amount of data on the impact of air and noise pollution on our children and our environment. This expansion project, over a 50% expansion in square footage, will result in children being exposed to lead and other carcinogenic emissions. Of particular concern are children who live within 5 miles of the expansion, including the hundreds of children who play at the athletic fields located directly across the street from the proposed expansion project.

Massachusetts has been leading the way to reduce our carbon footprint. As we have seen change at such an accelerated pace, this is no longer climate change, it is climate catastrophe. To propose an expansion of this magnitude as we face an unprecedented existential crisis of climate catastrophe is profoundly irresponsible, disappointing and dangerous. This expansion is proposed in a densely populated area with families with young children in close proximity. If we allow this expansion, then we are failing our children and our planet.

By Massport's own admission previously, the goals of this project are to increase profitability of the airport and to provide private jet travelers a more luxurious and private travel experience. This expansion is a money grab catering to the corporate elite at the expense of children, families and the environment.

Reference is made to the letter HFAC submitted in opposition to this expansion project and all comments incorporated herein. Additionally, please find concerns below including but not limited to the following:

- Increased jet traffic, carbon, lead & other poisonous gas emissions, and noise, including jet engine startups, taxiing and maintenance
- The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase.

- Health and safety effects to our children and families, living close to the airport, in particular, for all kids playing on The Edge fields
- The overall impact of this airport on climate change is certain to be harmful to our planet
- There will be aircraft refueling (possibly with underground tanks) directly over an aquifer and yards away from Hartwell Road
- There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced
- Over 34 acres of forest with mature trees will be cleared and paved over, creating an overheated microclimate
- Hanscom Field adjoins Great Meadows National Wildlife Preserve. Therefore, this project will endanger protected wildlife
- There will be increased road traffic (including trucks) both pre and post construction along with air contamination during construction
- There will be huge water runoff in storms (with some fuel contamination)
- There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments
- This is for the benefit of corporate executives and companies that can afford to buy and use private jets

Based upon the aforementioned concerns, I strongly oppose the North Airfield Development project.

Sincerely,  
Pamela Nelson  
15 Liberty Road  
Bedford, MA 01730



Patricia and Steve Dahlgren  
383 South Road  
Bedford MA 01730

February 14, 2023

Alexander Strycky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114

Dear Mr. Strycky,

We are writing as 30-year Bedford residents and a regular attendee of HFAC. Our comments and questions about the MEPA project 16654, "L.G. Hanscom Field North Airfield Development" are as follows.

1. I have attended HFAC for five years and this filing is the 1st time details about the proposed project have been provided. For months the sale + renovation of the old Navy Hangar appeared to be completely separate from the North Airfield project; now these projects are combined under a single developer. The scale of this project and short comment timeframe makes it difficult for area communities to fully understand the proposal in the allowed comment period.
2. The project includes a "fuel farm" despite being located over an aquifer. The Proponent said the *intent* is to have the fueling trucks travel over to the North Airfield area from the current operations on the south side of the field. There is no firm requirement to keep the refueling trucks within airport property.
3. 34 Acres of mature woodland will be removed. Where is the mitigation?
4. The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase yet we are told this will not produce a net increase in jet aviation traffic. Please provide the data to support this.
5. The overall impact of the proposed North Airfield/Old Navy Hangar projects will cause regional harm and contribute to environmental damage in many ways. This large airport expansion is incompatible with the densely populated region. Where is the mitigation?
6. Where is the necessary multi-faceted community mitigation for this project? I don't see any indicated, and that is unacceptable for a project of this scope.

Sincerely,

Patricia + Steve Dahlgren

**From:** [Stevens, Patrick J., MD](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 11:10:42 PM

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**CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

I am writing in opposition to the proposed Hanscom Expansion. As a resident of Concord and nearby to the airfield, I have become well acquainted with the air, noise, and light pollution created by this airport. An expansion that will undoubtedly accelerate the destruction of the environment and health of the local residents that live in the nearby communities. I speak on this not only as a physician who has, in the course of my career, worked in highly polluted environments and seen its destructive consequences first hand. I also speak as a father and husband who want to preserve the health and well being of my own family.

I stand with my community in opposition to this expansion and request our representatives in government do as well

Patrick J Stevens MD

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**From:** [lucypage \(null\)](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA#16654:L.G.Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 11:58:39 AM

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We would like to register our objections to the OUTRAGEOUS plan to accommodate more corporate jets at Hanscom.

In the middle of a National Park?  
Environmental Pollution to the max?  
In the middle of clustered housing?

Profits over the future of the planet. Shame.

Peter and Lucy Sprayregen  
Lincoln , Massachusetts

Sent from my iPhone

**From:** [randi.currier](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom expansion for corporate jets  
**Date:** Tuesday, February 14, 2023 11:17:31 AM

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**CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

Massachusetts and its residents are working assiduously to address the threats of climate change. Climate impacts are affecting us all and inequitably burdening the disadvantaged. In the midst of this, Massport continues to make decisions with blinders on. Prioritizing private corporate clients at this time is hugely counterproductive to society for climate, emissions, noise, trees, water use, and water run-off. I strongly oppose this prioritization and urge Massport to realize that though their mission is transportation they operate within a complex structure. The last thing our state needs is to benefit this most inefficient mode of transportation and the wealthiest citizens.

Sincerely,  
Randi Currier  
265 Davis Rd, Bedford, MA 01730

February 14, 2023

Mr. Alexander Strycky  
Environmental Analyst  
Massachusetts Environmental Policy Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Public comment concerning EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
Submitted via email ([alexander.strycky@mass.gov](mailto:alexander.strycky@mass.gov)) and via MEPA public comment portal

Dear Mr. Strycky:

We are residents of Concord MA.

We write to express our objections to the proposed expansion of the airfield as detailed in the Environmental Notification Form (ENF) submitted by the private developers, to MEPA. This extensive development project would essentially double the combined infrastructure of current operations at Hanscom Field. The plan as submitted has major implications for the communities surrounding the airfield as well potential impact on the numerous historic and environmentally sensitive sites adjacent to it.

The current level and frequency of air traffic, and the accompanying noise, particularly late afternoons, on weekends and too often prior to 7am and after 11pm, is noticeable. The proposed plan calling for additional hangars for aircraft parking, storage, maintenance, and refueling will not only increase air traffic levels but it will increase vehicular traffic by 194 trips a day through the construction of a new service road.

Of particular concern is the proposed reconfiguring of an existing taxiway to support larger and heavier aircraft. The noise and impact on outdoor activities generated by the current Design Group III aircraft is significant. Enabling larger Design Group IV aircraft such as the Boeing 707-320 and Airbus A310-200 to access Hanscom is alarming.

This massive development would increase the impervious acreage by over 50% to 23.9 acres. It would increase water usage by 13,500 gals per day at a time when the communities surrounding Hanscom grapple with water management issues. And the plan will require treatment of the expected 12,150 gals of wastewater generated by the expansion.

The environmental effects are not just limited to increases in impervious acreage and water management. The airfield is adjacent to Great Meadows National Wildlife Refuge, Minute Man National Historic Park and numerous historic sites in Lexington, Bedford and Concord. Over the years much has been done to prevent the decay of these historical, and environmental gems from the effects of pollution, noise and over development. The scope and scale of the proposed development threatens those successes.

It is difficult to understand why such a massive expansion of the airport project is necessary in light of the potential natural (environmental) and human impact that will result. We are left with many questions. Who stands to benefit from the project? Why now? How will the project address the

sustainability goals of the surrounding communities? What is the impact of allowing substantially larger, heavier and noisier planes land at Hanscom? What effect will the potential increase in air traffic have on air quality levels along flight paths? There are many other concerns as well.

While much of the adverse effects will be felt by residents of Concord, we do not stand to gain anything as a result of the project.

We ask Massport and the Massachusetts Environmental Policy Act Office (MEPA) to consider alternatives to the development proposed by Runway Realty Ventures, LLC and North Airfield Ventures, LLC and to require the parties to adequately address the concerns raised by many of the 140 attendees who participated in the February 6<sup>th</sup> public forum.

Respectfully yours,



Ray Considine  
Edie Lipinski  
133 Annursnac Hill Road  
Concord, MA 01742

Cc: State Senator Michael Barrett  
State Representative Simon Cataldo (14<sup>th</sup> Middlesex District)  
State Representative Carmine Gentile (13<sup>th</sup> Middlesex District)



THE GENERAL COURT OF MASSACHUSETTS

STATE HOUSE, BOSTON, 02133-1053

February 14, 2023

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs (EEA)  
ATTN: Massachusetts Environmental Policy Act Office (MEPA)  
100 Cambridge St. Suite 900  
Boston, MA 02114

RE: EEA 16654, L.G. Hanscom Field North Airfield Development

Dear Secretary Tepper and Mr. Strysky,

I write today in support of comments offered by the Town of Bedford relative to the proposed Development of the North Airfield at L.G. Hanscom Field, EEA 16654. Please find the Town's comments enclosed. I reiterate the concerns relayed by the Select Board, Town Manager, Department of Public Works, Fire Department, and several other town departments. As the town notes, this project will have a significant impact on my constituents in Bedford, as well as in Lexington, and it will have significant impacts on Bedford's infrastructure. The proponent should consider efforts to alleviate impacts on residents and the town of utmost importance.

I draw specific attention to the proposition advanced by the proponent that the number of overall flights coming to and from Hanscom Field may not increase, or any such increase may be minimal, because a decrease in the number of round-trip "ferry flights" will result in half as many take off/landings per trip for these flights. However, for months I have been asking MassPort and the proponent to provide data that would support this assumption. This data has not been provided. While it is possible that the availability of these hangers may reduce the number of flights per day by the number of aircraft that can fit in the new hangers at any one time, it is also possible that operators will both utilize the added hanger space at night, and still conduct whatever flights they deem necessary during the day, including "ferry flights". This would result in an overall increase in aircraft operations associated with the airport. Without a comprehensive analysis and evaluation of this data, we cannot be confident about the project's impact on the neighboring communities.

Importantly, I wish to reiterate the Town's comments regarding proactive communication with Bedford residents, and the opportunity for them to be heard. Proactive outreach and an ongoing dialogue with residents and Town leaders regarding the construction and aircraft activity will prove important for both the proponents and the town.

Thank you for reviewing these comments. On behalf of the Town of Bedford and my constituents, I urge MEPA to consider these concerns during the project's review

Sincerely,

A handwritten signature in blue ink, appearing to read "Kenneth I. Gordon", with a long horizontal flourish extending to the right.

Kenneth I. Gordon  
State Representative  
21<sup>st</sup> Middlesex District



Town of Bedford  
Town Hall, 10 Mudge Way  
Bedford MA 01730

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs (EEA)  
Attn: MEPA Office  
Alexander Strysky, MEPA Analyst for the Project  
100 Cambridge Street, Suite 900  
Boston MA 02114  
VIA EMAIL: Alexander.strycky@mass.gov

Re: EEA 16654, L.G. Hanscom Field North Airfield Development

Dear Ms. Tepper and Mr. Strysky:

Thank you for the opportunity to submit public comments regarding the proposed North Airfield Development at L.G. Hanscom Field in Bedford, EEA 16654.

The proposed North Airfield development lies within the Town of Bedford and relies on Town infrastructure to operate. Our residents will feel the greatest impact from both construction and daily operations of the new facilities. We encourage the Proponent to consider more broadly the needs and interests of the Town, particularly of the residential neighborhoods both west and east of the Project boundaries, and the youth sports facility located directly across Hartwell Road from the Project.

The following comments come from the Select Board and Town departments, including Public Works, Fire, Health and Human Services, Planning, and Code Enforcement.

**I. INFRASTRUCTURE**

The proposed Project creates substantial impacts to the Town of Bedford's infrastructure, including roadways and utilities. We understand that Massport is exempt from local zoning regulations, though the Project will require several regulatory permits and approvals from the Town (page 1-7, Table 1-3).

The full extent of growth and activity in the North Airfield area cannot be understood without acknowledging the ongoing construction of T-Hangars abutting the west side of the Project. These hangars should be reflected on the site plan, if only in grayscale, to allow local officials and residents to see the full picture of increased development at Hanscom Field.

**Traffic**

The Project will significantly impact local roads in Bedford. Hartwell Road is a narrow local road that curves along the edge of the airfield property, with limited sight distance in many key spots. Other local access points include Loomis Street, South Road, and the Hanscom AFB "Fam Camp" area near the northeast end of Runway 5-23. During the 2017 reconstruction of Runway 11-29, Massport used local

roads in Bedford (chiefly Hartwell Road and South Road) for construction vehicle access, causing persistent and significant disruptions to neighborhoods and residents. **We urge consideration of the following items related to traffic and roadway impacts from the Project.**

### 1. Traffic Study

**A full traffic analysis should be required** to determine average daily trips and peak hour impacts to the intersections of Hartwell Road at Concord Road and Hartwell Road at South Road, including an evaluation of traffic signal warrants for each intersection.

### 2. Internal Service Roads

We note that the Proponent is exploring the feasibility of using the airfield to accommodate construction vehicle traffic and ongoing fuel delivery (page 1-5, 1.5 Anticipated Project Schedule and Phasing) by constructing a new inner roadway. **We strongly encourage this option, which would allow construction vehicles and fuel trucks to access the Project site from Interstate 95/128 to State Route 2A and Hanscom Drive, which are designed to handle heavy equipment at high volumes, unlike Bedford's local roads.** The Proponent should confirm whether such internal circulation route used for construction will be closed following completion of the Project.

The scope of review should be expanded to include any potential changes to the existing service road that extends around the periphery of Runways 23 and 29. There are several wetlands, watercourses, and flood plains adjacent to the service road that could be impacted by any proposed improvements or construction activity. The types of vehicles and internal traffic that might use this service road should be identified (e.g., fire apparatus, fuel trucks, service vehicles, employee vehicles, etc.). **If an internal service road is not available between facilities on the south and north sides of the airfield, the resulting impact on local streets from moving people and materials around the airfield must be examined and addressed.**

The scope should also address whether there is any proposed connection of a service road from the T-hangars westerly to the existing service road around Runway 11.

### 3. Long-term Changes to Roadways

The Proponent proposes to use "an existing curb cut" (ENF, page 6) off Hartwell Road for staff and passengers to enter the Project area, while Figure 1.2 appears to show two curb cuts—one for the North Airfield and one for the Navy Parcel. **We encourage the Proponent to minimize the use of Hartwell Road as an access point for the Project,** especially during construction.

Among mitigation options for increased traffic impacts, **the DEIR should examine potential changes to the layout of Hartwell Road,** including possible realignment to reduce the sharp curvature of the roadway along the Project boundaries and improve sight distance and safety for all users. The project may affect the public access easement over Hartwell Road where the land is currently owned by the Federal Government; additional information is required on this point.

**The Town encourages assessing the feasibility of adding sidewalks and bike lanes on Hartwell Road,** for eventual connections to an ongoing effort to expand pedestrian mobility and the sidewalk and trail network throughout Bedford.

### **Utilities**

In preparation of the DEIR, **the Proponent should confirm with Bedford DPW whether improvements are required in the water and sewer system to accommodate the Project.** The List of Anticipated Regulatory Permits and Approvals (page 1-7, Table 1-3) shows a Water Service Connection and Sanitary Sewer Service Connection for the Navy Parcel only, not for the new construction at the North Airfield. Given the anticipated 13,500 gallons per day of additional water use and 12,150 gallons per day of additional wastewater generation and treatment, as outlined in the Summary of Project Size and Environmental Impacts (ENF, page 3), we expect each parcel will need its own water and sewer connection and associated permits, and may also be subject to Inflow and Infiltration under the Town's Sewer Bylaw. Additional capacity analysis for both water and sewer demand should be performed by the Town's consultants at the Proponent's expense for the full buildout of both sites.

**The applicant team should also explore potential electric supply/capacity issues,** including the potential need for expanded capacity at the existing substation at the intersection of Hartwell Road and South Road; installation of new wires/poles/transformers along Hartwell Road; or installation of any on-site substation to supply the Project, given the Proponent's stated intent of increasing the use of electric-powered aircraft.

### **Capacity/Growth**

The Proponent states that the Project will decrease operations in and out of Hanscom Field, due to reductions in so-called ferry flights by aircraft based elsewhere. The ENF repeatedly notes that current hangar capacity is oversubscribed, with existing hangar owners reporting wait lists for aircraft wishing to be housed at Hanscom. Without clear data on the number of ferry flights and existing hangar capacity, we question the assumptions underlying the Project and the expectation that the Project will meet both current and future needs. **We ask the Proponent and Massport to provide current data on the number of ferry flights and justification for the claim of fewer total flights due to the Project.**

## **II. ENVIRONMENTAL**

The Project will have significant impacts on Bedford's natural resources, including stormwater management, air quality, noise pollution, and wetlands and wildlife protection.

### **Noise**

Bedford is a member of the Hanscom Field Advisory Commission (HFAC), a coalition of neighboring towns that meets monthly with Massport to review noise and capital project reports, among other relevant items. Bedford residents consistently log the highest number of noise complaints each month

from aircraft operations, including takeoffs, landings, and touch-and-gos. Flights in the air are under the jurisdiction of the FAA, but Massport has jurisdiction over aircraft when they are on the ground.

Aircraft stored in the new hangars will need to taxi to and from the Project area to the runways. Adjacent residential neighborhoods will feel increased noise impacts due to the proximity of idling aircraft, maintenance, and site operations. The noise from this ground movement may not be captured in monthly noise reports, which rely on technology that matches the site of a noise complaint with available data on planes in the air (airnoise.io, Flight Tracker, etc.).

**We urge Massport and the Proponent to minimize or absorb such ground noise**, whether through physical barriers, restrictions on operations, or other measures, and to take proactive steps to measure actual noise in the future.

### **Stormwater Management**

The Proponent should be aware of the Town's Stormwater Management Bylaw and Regulations, as these standards are more stringent than MassDEP's stormwater standards. Per the project description (ENF, page 6), the site will "be designed to encourage positive drainage away from the hangar buildings." Water that drains away from the hangars must go somewhere, and we are concerned that additional stormwater could end up in Bedford's neighborhoods, wetlands, or conservation lands.

We appreciate the consideration for pervious pavement in parking and other areas to reduce the potential for excessive stormwater runoffs, but **we remain concerned about impacts of new construction and use on local waterways and our water table.**

### **Wetlands/Aquifer Protection**

The North Airfield site lies within one of the Town's aquifer protection districts, and wetland buffers cover more than half of the total airfield property. Since the 2017 ESPR, Bedford has ceased use of its Shawsheen wells due to PFAS/PFOA contamination, which we believe was caused at least partly by firefighting foam and other chemicals in use on and around Hanscom Field. The North Airfield and Navy Parcel sites are also adjacent to the former Naval Weapons Industrial Reserve Plant, which remains under EPA cleanup protocols as a Superfund site.

**An initial wetland survey of the development area by a third-party consultant would be helpful.** The Town GIS map shows an area of wetlands north of the long east-west running wetland feature. While isolated vegetated wetlands are not protected under the state Wetlands Protection Act, they are under the Town's Wetlands Bylaw.

In a briefing to Bedford Town officials prior to the filing of the ENF, the Proponent indicated that no new fuel storage was intended within the Project. Presenters at the virtual information session on February 6, however, indicated that on-site fuel storage was now proposed. **The DEIR should include identification and method of such storage, and the measures to be taken to ensure protection of the surface waters and groundwater.**

## **Air Quality/Emissions**

The Air Quality section of the ENF (page 24) claims that the Project does not meet or exceed any review thresholds related to air quality. We caution the Proponent, however, that many of the pollution sources outlined by MEPA are not regularly tested at Hanscom Field, or are evaluated using modeling only and not sampling, based on the 2017 ESPR and the approved scope of the 2022 ESPR. We note in particular that the state's definition of "lead" under 301 CMR 11.03(8) only relates to lead paint, as measured by the proportion of residences built prior to 1960 (Appendix B, EJ Screen Report). In 2021, 55% of all operations at BED were single-engine piston aircraft. These older planes are one of the few remaining aircraft that still use leaded avgas, which means **residents of Bedford and surrounding towns are particularly vulnerable to lead emissions from aviation**. These emissions are not captured by MEPA's review and have not been measured in ESPRs, but are likely present in soil and groundwater at the airfield.

Additionally, given that the fueling concept is not yet defined, **modeling for air quality should include all potential fueling scenarios**: specifically, whether the trucks used to fuel aircraft onsite will be filled from offsite or onsite (on-airport) fuel farms. The filling from onsite fuel farms could represent a doubling of the opportunity for onsite HAP/VOC emissions.

More broadly, prevailing winds will transport ambient fumes from fueling operations and idling aircraft exhaust into an adjacent residential neighborhood. During construction, these winds may also transport dust and other sediments. **The DEIR needs to identify mitigation measures for airborne impacts**, both during construction and during future operations.

## **Wildlife**

The development site abuts both Core Habitat and Critical Natural Landscape as depicted on the MA Division of Fisheries & Wildlife biomap. **Wildlife impact analysis should be undertaken to evaluate the impacts to habitat for the many species of wildlife that live on the airport grounds**.

## **Other Environmental Concerns**

- The DEIR should address the status of any remaining contaminant mitigation affecting the former Navy Hangar site.
- New impervious surfaces created by additional pavement and rooftops, combined with the loss of existing vegetation, may yield heat island impacts. The DEIR should evaluate the microclimate created by the Project and identify possible mitigation measures.

## **III. ADDITIONAL CONSIDERATIONS**

### **Emergency Response**

We understand that discussions to date suggest Hanscom's internal Fire Department would respond to incidents involving aircraft and hangars, but Bedford's Fire Department would respond to incidents

involving civilians and office spaces. This is not an environmental issue for the ENF, but something that needs further negotiation, particularly with regard to local taxes and/or a PILOT agreement between the Proponent and the Town of Bedford.

### **Public Process and Notifications**

**We urge the Proponent to conduct proactive outreach to residents in Bedford and the other Hanscom area towns**, rather than wait for community members to request such a meeting (Appendix B, page 3). Given the significant impacts the Project will have on our community, during both construction and later daily operations, connecting with residents, boards, and professional staff early and often to understand our concerns will be key to a productive relationship in the long term. The Town is happy to coordinate with the Proponents and Massport to arrange such meetings.

### **Educational Partnerships**

The ENF lists as a project benefit a potential partnership with Bridgewater State University and its Aviation Management degree program. We note that Middlesex Community College (MCC), located in Bedford and Lowell, offers an associate's degree program in Aviation Maintenance Technology, in partnership with the National Aviation Academy at Hanscom Field. If the Proponent seeks local students to train and recruit for future employment opportunities, **we encourage a partnership with MCC as well.**

Again, we appreciate the opportunity to submit public comment on this project. We look forward to developing a productive relationship between the Proponent and the Town of Bedford as the permitting process continues.

Sincerely,

The Select Board of Bedford

Emily Mitchell, chair; Bopha Malone, clerk; Margot Fleischman, Shawn Hanegan, and Edward Pierce

Office of the Bedford Town Manager  
Bedford Department of Public Works  
Bedford Planning Department  
Bedford Fire Department  
Bedford Code Enforcement Department  
Bedford Health and Human Services Department  
Bedford Housing & Economic Development Department

Cc: State Representative Kenneth Gordon  
State Senator Michael Barrett  
Christopher Eliot, Chair, Hanscom Field Advisory Commission



*The Commonwealth of Massachusetts 193<sup>rd</sup> General Court*

**House of Representatives**

State House, Boston 02133

**Michelle Ciccolo**  
State Representative  
15<sup>th</sup> Middlesex District

**Room 473F**  
[michelle.ciccolo@mahouse.gov](mailto:michelle.ciccolo@mahouse.gov)  
617-722-2210 O / 781-330-0730 G

February 14, 2023

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs (EEA)  
ATTN: Alexander Strysky, Massachusetts Environmental Policy Act Office (MEPA)  
100 Cambridge St. Suite 900  
Boston, MA 02114

RE: EEA 16654, L.G. Hanscom Field North Airfield Development

Dear Secretary Tepper and Mr. Strysky,

Thank you for convening the site visit and informational public meeting on February 6<sup>th</sup>, both of which I was able to attend. I appreciate the opportunity to comment about this proposed development and look forward to actively following the progress of this proposal. At the information session, the project proponents made a good faith attempt to describe the conceptual plans for this project at this preliminary stage. However, in reviewing the applicant's filing, I find there are still many areas that need to be fleshed out further so the full environmental impact of the project can be understood and mitigated.

As was expressed by my colleagues in the legislature and by many of the impacted constituents, there is a real concern that this project appears to run counter to the required net-zero carbon mandates the state must meet by 2050. With that in mind, I am primarily concerned with understanding and ascertaining what the energy use and carbon impacts of the project will be. The applicant makes assertions that air traffic will be reduced by the elimination of "ferry" trips as aircraft will be able to remain in hangars overnight. I believe the detail around this claim must be fleshed out with actual data on regular air traffic customers who access this airfield. A full analysis of potential air traffic impacts should be conducted. The questions I raised at the public meeting should be answered in full in the DEIR. I would also appreciate the proponent providing greater detail on the following:

- How many of the new hangars are already leased and how many are speculative?
- Provide data on the ferry trips and how many will be eliminated
- Flesh out the impact to impervious areas – the ENF seems to have different calculations in different sections. Please be sure to include calculations for both the Navy parcel and the leased Massport parcel.
- Provide detail on how many trees (and their caliper) will be removed during construction and an estimate of the carbon sequestration that will be lost from the removal of the vegetative areas.
- Provide more detail on the energy usage of the hangars themselves. Will they be heated and/or cooled?



*The Commonwealth of Massachusetts 193<sup>rd</sup> General Court*

**House of Representatives**

State House, Boston 02133

**Michelle Ciccolo**  
**State Representative**  
**15<sup>th</sup> Middlesex District**

**Room 473F**  
**michelle.ciccolo@mahouse.gov**  
**617-722-2210 O / 781-330-0730 G**

I am grateful that the proponent is exploring solar and a series of green building techniques. It is also sensible that the developer is planning on providing extra electricity capacity to accommodate electric vehicles and eventual electric airplanes down the road. It is also a positive sign that the project is being designed to LEED Gold standards. However, I encourage the applicant to go further and not only explore, but to deliver on these concepts, including solar on all its roofs. If all the electricity produced from solar PV will not be needed for its own on-site consumption, the proponent could create a community shared solar project which would have great benefits in offsetting any increase in air pollution the project might generate. In addition, the buildings can and should be designed to LEED Platinum standards and heat pump, geothermal, or other electric technology should be used for any areas that will be heated and cooled. Finally, I would like to see aggressive mitigation proposed for the loss of trees and vegetative areas. If there are no on-site locations within Hanscom for replanting, which I assume there will not be, then I encourage the developer to provide the adjacent towns with funding to preserve privately held forested parcels to help offset the air quality impacts that the loss of trees and vegetation will create.

Hanscom airfield is an important regional airport that provides meaningful economic activity and jobs for the area. I also understand and acknowledge that this development concept is part of a longstanding planning effort by Massport, which has valuable benefits for the regional economy and will reduce strain on Logan Airport. Nonetheless, it behooves us to work closely with the proponent to ensure that the project is sensibly designed to reduce and mitigate any negative impacts that could come from the development. As the project unfolds, I am certain the impacted communities and abutters will have more questions, comments, and suggestions as to how this project should be developed. As the Representative for the 15<sup>th</sup> Middlesex District, which includes most of Lexington, I plan to stay engaged in the discussions around this project and would be happy to facilitate communications between constituents and the community should that be helpful.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Ciccolo".

Michelle Ciccolo





*The Commonwealth of Massachusetts 193<sup>rd</sup> General Court*

**House of Representatives**

State House, Boston 02133

**Michelle Ciccolo**  
**State Representative**  
**15<sup>th</sup> Middlesex District**

**Room 473F**  
**[michelle.ciccolo@mahouse.gov](mailto:michelle.ciccolo@mahouse.gov)**  
**617-722-2210 O / 781-330-0730 G**

29 Shade Street  
Lexington, MA 02421

February 14, 2023

Alexander Stryisky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Stryisky@mass.gov  
(857) 408-6957

RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Stryisky,

Thank you for providing an opportunity for the public to comment on MEPA project 16654.

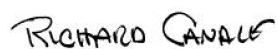
As a former Planning Board member in Lexington, and as a convenor of multiple environmental public process review groups of past Massport Hanscom and related projects, I am disappointed at the proponents' lack of clarity at the February 6, 2023, MEPA ENF meeting.

*“The MEPA review process provides meaningful opportunities for public review of potential environmental impacts of certain projects for which certain actions by state agencies are required. It requires state agencies to study the environmental impacts of projects requiring state permitting, financial assistance or land disposition, and to use all feasible measures to avoid, minimize, and mitigate damage to the environment or, to the extent damage to the environment cannot be avoided, to minimize and mitigate damage to the environment to the maximum extent practicable.”*

The proponents failed to respond to key questions raised by participants at this meeting. They said they will provide responses later in the process. The Hanscom Field Advisory Commission February 9 letter to you on the ENF outlines most key questions, of which few were responded to meaningfully. Without knowing the current and anticipated level of Ferry flights and the degree of unwarranted expansion, it is difficult to provide good information to you so you can declare a proper scope for the required Environmental Impact Report. You should extend the ENF filing review period so that stakeholders can make informed input to you as you define the EIR Scope.

In any event, the proponents' consultants indicated they would issue a draft EIR for public review in June with the expectation that the comment period would be limited to July/August when public review is most difficult. It seems that the proponents wish to severely limit the public process. The impacts of this project involve Climate Change, four Towns, the National Park, the National Wildlife Refuge Preserve, and countless community organizations and residents. During the summer months, individuals plan one or two weeks away from home for family vacations. This disrupts the normal flow of information that occurs in the other ten months. Please ensure that the public review period for the Draft EIR include a few weeks outside of July/August.

Please let me know if you wish any additional information.



Richard Canale.  
781 799-5279

**From:** [Rosemary Tolwinski](#)  
**To:** [Mike.Barrett@masenate.gov](mailto:Mike.Barrett@masenate.gov)  
**Cc:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16664 Hanscom Airfield Development  
**Date:** Tuesday, February 14, 2023 10:47:10 AM

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Please do something to stop this madness at the airfield as this has dire consequences the the surrounding towns and Massaport does not seem to listen to the citizens of these communities. Many people have complained about the traffic noises (flights incoming during the early am hours) and these complaints have gone unheard). With more and larger planes scheduled to use the airfield many of these factors will have an implact (see below):

Increased aircraft operations and ground travel ◦ Noise, air, water, and soil pollution ◦ Public health ◦ Environmental Justice populations ◦ Climate change ◦ Wildlife ◦ Mature tree removal

Thank you for hearing my complaints and I hope that you wil do everything you can to stop this.

Rosemary Tolwinski  
Bedford Resident

**From:** [ray.collings](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 11:44:40 AM

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Sir,

As a local resident living close to Hanscom airport I am disheartened to learn of the proposed expansion to the facilities there.

I already find the noise of the aircraft annoying and occasionally the smell of aviation (?) fuel wafts over too. Both are horrible. I routinely drive the roads around the airport getting to and from Bedford, Lincoln and Concord, and having more vehicular traffic accessing the airport will add to an already overused road system there. There is almost certainly going to be more noise, more air pollution (planes and vehicular traffic) and safety concerns as well. I am also concerned about the amount of increased water use and increased potential for groundwater contamination. One of my running friends used to work for Massport and he spent a great deal of time on-site over there. He knows the facility quite well. He's retired now but when I talked to him about the project and showed him the available literature online he told me he would vote a big NO for the project if he lived nearby.

I myself have read information both for the project and against it, and I see no compelling evidence FOR the project.

Please consider this email to you a serious VOTE OF NO CONFIDENCE IN THE DEVELOPMENT.

Thank you for your thoughtful consideration in this matter.

Ray Collings



# RURAL LAND FOUNDATION

145 Lincoln Road, Suite 102A  
P.O. Box 10  
Lincoln, MA 01773  
Telephone: (781) 259-9250  
e-mail: [McGean.RLF@LincolnConservation.org](mailto:McGean.RLF@LincolnConservation.org)

## TRUSTEES:

- Susan Allen, Vice-Chair
- Michelle Barnes, Chair
- Kenneth Bassett
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- Daniel England
- Andy Falender
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- Paul Shorb
- Nancy Soulette,  
Secretary
- Andrew Stevenson
- Susan Welsh

## STAFF:

- Geoff McGean,  
Executive Director
- Bryn Gingrich  
Assistant to Executive  
Director

February 14, 2023

Via email to [Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)

Alexander Strysky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
[Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)  
(857) 408-6957

RE: EEA#16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

It is the Rural Land Foundation's (RLF's) mission to help protect the rural character of Lincoln by, among other means, conserving land through creative land planning and development. *The RLF is writing to express our strong opposition to the Hanscom Field North Airfield Development ENF expansion plans.* We concur with other letters of dissent regarding this project sent by fellow organizations including the Lincoln Select Board, the Lincoln Green Energy Committee, the Hanscom Field Advisory Commission and WIDE Lincoln which cite environmental, ecological, climate and environmental justice concerns about this planned development. Their specific requests for data and analysis should be granted before proceeding with development. To that list we would add analysis of what local land in neighboring communities could be purchased and placed under conservation restriction in order to act as a sufficient offset to the inevitable net increase in greenhouse gas emissions this development project would engender.

We also would like to emphasize the harmful impact this project would have in perpetuity to wildlife, its habitat, and the functioning of wetlands so important for climate change resilience and so fundamental to Lincoln's rural character. We strongly encourage further evaluation of the harms and benefits of this development as the environmental, ecological, climate and environmental justice costs to the public and climate appear to far surpass its private benefits for a few.

Sincerely,

Geoff McGean  
Executive Director

Michelle L. Barnes  
Board Chair

**From:** [Russell Gershman](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654:L.G. Hanscom Field North, Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 11:34:50 AM

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Dear Mr. Strycky,

An expansion of facilities and operations at Hanscom would be deleterious for all of the citizens in the surrounding towns as well as the country as a whole in so many ways including increased noise, traffic, air pollution, global warming, etc.

It is difficult to believe that in this day and age that the desires of a few should trump the health and needs of the many.

Please abandon this project and protect the well-being of the surrounding towns and our country.

Sincerely,  
Russell Gershman  
70 Bedford Road  
Lincoln, MA 01773

Sent from my iPhone

**From:** [sally kindleberger](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** I have HUGE concerns!  
**Date:** Tuesday, February 14, 2023 8:13:42 AM

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I am worried about large numbers of jets flying over my quiet house and town. The noise and pollution will be terrible! Aren't we supposed to be doing all we can to move towards a green environment? Let's try to prevent global warming and climate change!!!! Creating more jets powering through the atmosphere will do nothing for our planet! Also besides noise and air pollution please think of what this will do to wildlife! In conclusion I am horrified and disgusted by this project! The top 1% need to help the world-not destroy it with their play things - their loud polluting jets!

**From:** [Sandy C](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 5:54:10 PM

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Dear Mr. Alexander Strysky,

Thank you for the tour of the north hanger facilities and for the zoom meeting. I would like to add a comment to the MEPA public record.

For the record, I am opposed to the current plan for the north airfield development. At a summary level I am against it for all the reasons verbally and eloquently expressed by State Sen. Mike Barrett and State Rep Ken Gordon. One of the critical reasons for opposing this development is that by creating greater jet access and usage, we are working in opposition to the Climate Change and Climate Justice initiatives at the federal, state, and local levels. We need to reduce our use of fossil fuels, not increase their use.

A second critical issue is that no data has been presented that the total number of jet traffic will be reduced by this development. For the 27 jets that may/will be housed in the proposed north hanger facility, there is no data, and in particularly no compelling data, that has been independently reviewed and verified that supports this claim.

As such, I would like to explicitly ask the proponents of the development to provide detailed and demonstrably accurate data regarding the number of ferry flights that will be reduced as well as data as to the number of additional jet traffic as a result of the north airfield hanger development. And to provide this data and conclusions regarding this data as well as comments from independent experts in the field of jet and airport traffic regarding both the data and conclusions from it.

Thank you.

Kind regards,  
Sandy Currier



**From:** [Sara Cherkerzian](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:29:10 PM

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Dear Mr. Strycky:

What are the current average numbers of flights per day, per week, and per month? And what will the average numbers be upon completion of the development?

Sincerely,

Sara Cherkerzian

**From:** [Sara Mattes](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 3:21:58 PM

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February 14, 2023

Alexander Strysky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114 [Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov) (857) 408-6957  
Dear Mr Strysky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

I am writing to object to any suggestion that the proposed development at L.G.Hanscom Field, noted above, is consistent with the Commonwealth's commitment to addressing climate change in the June 22, 2022 2025/2030 CEPC and to achieving net zero goal laid out in the 2050 Decarbonization Roadmap.

The proposed airfield development will not provide an essential service, but will rather duplicate existing transit options while adding to a significant expansion of the Commonwealth's carbon footprint.

Others have delineated the specific questions asking for clarification regarding the potential impact.  
I need not repeat.

**I ask for justification for the project, as a whole, given the goals of the 2050 Decarbonization Roadmap and the Commonwealth's Clean Energy and Climate Plan for 2050.**

As for the proposed "fuel farm," I would ask that the proponent provide explicit detail of the potential impact of a catastrophic event at said fuel farm.

What is the impact area of a blast/explosion, should such a catastrophe occur?

This has been explored, in the past, at L.G.Hanscom Airfield, using Air Force metrics, so such data exists.

Please provide an update that would be recalibrated to show the impact at the proposed farm(s).

Respectfully,  
Sara Mattes  
71 Conant Rd.  
Lincoln, MA 01773

-----

Sara Mattes

**From:** [Scott Morabito](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF.  
**Date:** Tuesday, February 14, 2023 8:04:38 PM

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I'd like to see a multi-year estimate on how the number of flights may be impacted with this expansion. Will this add 50% more flights per day? Surely the public should have a say in this since you'll be flying over our homes and shaking our tables. Will it be -10%?

Thanks you.

Scott Morabito  
165 Monsen Rd  
Concord MA 01742

--

Scott Morabito  
scottmorabito@gmail.com

**From:** [Scott L. Rodman](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Field North Airfield Development questions and comments  
**Date:** Tuesday, February 14, 2023 11:57:25 PM

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Dear Mr Strysky and your MEPA colleagues,

I attended both the in-person and zoom sessions to discuss the plan that has been proposed to develop hangars and a fuel farm at Hanscom Field.

As someone who is building a new home in Lincoln I have great concern over this proposed plan for the follow reasons.

- Massachusetts and the local communities have worked very hard to address the 2030 and 2050 climate goals and mandates and this plan is counter to every element of those environmental steps forward to address climate change and sets back the progress.
- the fuel farm that has been proposed but not fully outlined is a huge risk to the community and sufficient details have not been provided. Additionally, this seems to be contrary to what was previously stated.
- data to support the claim that this will reduce emissions has never been forthcoming. If the detailed data needed exists, it should be provided that shows five years worth of data for ferrying flights in and out, as well as how this will change if hangar capacity is expanded. That would mean data to show the waiting list for hangars, what those jets and their ownership consist of, the fractional ownership companies and their traffic by company, period of time, and type of jet over that five years, agreements that they have to house specific jet types at Hanscom and how that would then increase ferrying flights from Hanscom to other airports. From knowledge of the way that those firms operate, there is a need for the proponent to support their claims with facts and data. They have not and that results in a lack of trust for all claims
- this development supports a very small community of people that have the financial wherewithal not to care about their impact on air quality, emissions, or carbon footprint. Should the citizens of the communities surrounding this airport be subjected to increases in noise and emissions to support their desire to fly in their jets, rather than on commercial flights that have far less impact on the environment and should MassPort support and encourage that?
- other air quality issues have been serious issues at private jet airports, including San Jose, where private jets have been problems for years as their operations have expanded. Is that what MassPort finds acceptable and wishes to impact these communities
- times of day for flights and the small penalties for landing after hours are not any obstacle to flights occurring well outside of normal hours
- MassPort's own master plan speaks to expansion and this project runs counter to what were specific goals and objectives, as well as stated limits in that master plan
- The expansion of the size of planes that will regularly be taking off and landing is a stated goal of this development and that is also much more damaging by way of noise and air pollution.

The following are some of the questions that I believe need to be answered and responses in the process would be appreciated.

- 
- the issues noted above need to have the data that has been requested. Please include that information.
- Will there be limits on the number of planes taking off or landing during any given periods of time
- Will hours be changed, expanded or altered in terms of allowed takeoffs and landings
- What are the penalties for operation outside of those hours? Can those fees be changed and by what process?
- What are the entities and who are the individuals funding this project, beyond Mr. Argiros and Mr. Leerink, who appears to be acting on behalf of Silicon Valley Bank
- There are three LLCs that are listed. Please give a detailed description of the role of each of those, their structure and who is funding each one.
- How much debt is going to be used to fund this project
- What is the total cost of the project and how much equity is being invested?
- what is the long term plan for Logan Airport that might impact traffic at Hanscom?
- Is there a plan to offload more private jet traffic to Hanscom?
- What about charters and potential scheduled service? Is that in the works as well?.
- If this is approved, what is next? What process would be required for any future expansion if this was to be approved.
- What limits will be placed on future growth of traffic?
- What are the roles of Mr. Leerink from Silicon Valley Bank and Mr. Argiros of Norwood Cadillac and Boston Aston Martin and how are those organizations involved?
- Who are the team members who have the operational aviation experience and will be running this enterprise on a day to day basis?

Thank you very much for your efforts and we hope that the questions of the many local residents and community groups will be answered.

Scott Rodman  
16 Bypass Road  
Lincoln, Massachusetts 01773

---

*Scott L. Rodman*  
[slrodman@8500.org](mailto:slrodman@8500.org)  
212-665-8500

**From:** [Shah Carson](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Doug Carson](#)  
**Subject:** Formal objection to EEA #16654: L. G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 8:02:09 AM

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Mr. Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Public Comment re: EEA #16654: L. G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

I am a Lincoln resident living within a mile of the Hanscom facility and within the Hanscom flight path. This communication is in response to the above Environmental Notification Form (ENF) regarding the proposed expansion of the North Airfield area at Hanscom Field in Bedford, MA which borders Concord.

I have been advised by friends and neighbors who have attended the meetings and site visits that the plans are objectionable. As presented, I oppose the Hanscom Field expansion slated to begin construction in January 2024. The adverse impact of the project will be felt by residents throughout the area - families and businesses - but the benefits to any of us is completely not apparent.

I am concerned about increased traffic in vehicles travelling in and out of the facility as well as aircraft operations.

I am concerned about carbon emissions, noise, air, water and soil pollution.

I am concerned about public health, and the impact on wildlife and environment.

Questions:

What is the plan to curb carbon emissions and noise resulting from the increase in flights?

What is the amount of carbon emissions from airport operations now and what will be the emissions in when the project is completed?

What are the projected traffic implications on the roads immediately surrounding Hanscom field and what is planned to limit congestion and emissions from the increase?

What is the benefit to surrounding families and businesses for this project to go forward?

What alternatives have been considered by the developer to expand operations elsewhere?

Comments:

My reading and hearing from the Information already provided is that there will be more flights and more emissions which will adversely affect the health and welfare of the residents in the surrounding towns.

The 58% increase of 9 acres of impervious area will have a major negative impact on the environment and subsequently public health.

Please do not allow this project to go forward.

Sincerely,

Shah Carson  
143 Bedford Rd  
Lincoln, MA 01773

[shahcarson@yahoo.com](mailto:shahcarson@yahoo.com)  
339.203.3848

\*\*\*\*\*

Shah Carson  
shahcarson@yahoo.com  
+1.339.203.3848 mobile



**From:** [Louise Berliner](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA#16654: L.G.Hanscom Fields North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 8:40:42 PM

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Dear Mr. Strycky,

We wanted to weigh in on the proposed expansion and will be brief. In light of these times, with the increasing threat of climate change, and sustainability a state and national priority, as well as the local goals of halting the increasingly distressing loss and degradation of our natural and historical resources, the expansion project and addition of hangars and thus more aircraft and more flights, seem a poor trade for the well being of the land, plants, animals and people. Great Meadows National Wildlife Refuge is one of the many sites that will be affected by this—and there are many other, less well known patches of dwindling forest and meadow that our local wildlife depend on—and the people, too, need these places and their beauty and peace. The increased noise, pollution and general upheaval due to construction will go counter to the goals of sustainability and mitigating the impacts of climate change. We need to take the long view, and imagine the costs to future generations by the actions proposed.

Thank you for your time and energy.

Best,

Stuart Fried and Louise Berliner

**From:** [susan.seeley@verizon.net](mailto:susan.seeley@verizon.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF™  
**Date:** Tuesday, February 14, 2023 10:25:24 AM

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We wish to express our dismay and strong objection to the proposed development at Hanscom Field. From an environmental point of view the paving of 47(?) acres of wetlands, the proposal to create a fuel farm and the opening of access to more plane storage seems like an idea from the dark ages. Now that we all know that climate change is threatening our environment, how can we consider a plan that could and most likely will affect noise levels in our neighborhoods, the safety of our water, air and soil, and the diversity of plant and animal life in that area. As Lincoln residents, we have dedicated our efforts to green both our yard and our town, as have many others here. It is ironic that these many efforts are being threatened for someone's interest in commercial gain and that there seems to be little that residents can do to impact these plans.

Susan and George Seeley  
212 Concord Rd  
Lincoln MA

**From:** [Susan Foster](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** North Airfield Hangar Development Proposal  
**Date:** Tuesday, February 14, 2023 6:31:59 PM

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February 13, 2023

Mr. Alexander Strycky, MEPA Office -email  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: North Airfield Hangar Development Proposal

Dear Mr. Strycky:

I am writing in strong opposition to the proposed 49 acre North Airfield hangar development proposed by Runway Realty Ventures, LLC and North Airfield Ventures, LLC in their January 23, 2023 ENF.

The premise of this project is that it will result in a net benefit to the environment by limiting the number of ferry flights required by aircraft due to insufficient space currently available at Hanscom Field.

The proponent has provided no evidence that this primary premise of their rationale for development is valid.

As a long time user of Hanscom Field and a long time Massport business tenant, I find this premise to be totally inaccurate. Over the 35 years I've worked at and flown out of Hanscom, I've seen the growth of corporate jet operations at the airport, however the expansion of the three FBO's over that same time has largely kept pace with the hangar requirements for based aircraft.

I assert that much of the increase in turbine traffic using the airport is flown by fractional operators such as NetJets, Flexjets, Planesense, Wheels Up, etc. The business model of these operations precludes them from flying excessive ferry flights as the aircraft only make money for the operators when they are flying.

The fractional operators drop their passengers and leave Hanscom to pick up their next passengers as efficiently as possible. If they need to be hangared at Hanscom, that costs the operators lots of money. It's analogous to a taxi waiting for a rider rather than picking up the next fare and generating more revenue.

One can posit that these proposed hangars rather than decreasing ferry flights, will instead encourage more operators to base at Hanscom. The cost of this enticement in environmental terms is massive and in direct contradiction to Massport's own Master Plan of 1978. It also goes directly counter to Massport's commitment to have zero greenhouse gas impacts by

2031; a commitment the proponent even cites in their ENF.

To make matters even worse, this development is designed to attract category 4 large aircraft. These aircraft have a far greater carbon footprint and are incompatible with the type of aircraft Hanscom generally serves.

The environmental impacts of this development are an additional blight upon this largely suburban to rural environment. Not only will this development add parking for 240 cars, it will pave over 39 acres of land that's currently woodlands and wildlife habitats. While the proponent makes a case that they will be LEED gold certified, install solar panels and plan for stormwater runoff, it is impossible to make a case that paving 39 acres will improve flooding risks for an area already at high risk of urban flooding. The impacts upon a largely wooded suburban environment are tremendously negative.

As you should also be aware, Atlantic Aviation, one of the FBO's on the field is in the midst of a large hangar building development at the Pine Hill hangar site. That new hangar space will already increase the amount of hangaring for based aircraft in keeping with the demand.

In summary, the primary premise used by the proponent as the rationale for building these hangars; ie. It will decrease the amount of flights has absolutely no basis in the data. Aircraft don't generally drop their passengers and fly off to Logan to wait for their passengers to ask them to come pick them up. Rather, with three large national FBO's on the field, they will either get temporary hangaring space or tie down on the ramp. Since fractional operators run so many of the turbine flights in and out of Hanscom, the need for them to hangar is limited.

If this \$112,000,000 hangar, taxiway expansion is allowed to proceed, it would be tone deaf to the stated goals of Massport, the governor's office and the national messaging regarding climate change.

If an occasional operator needs to hangar an aircraft for several days, Massport has an ideal solution already as the Worcester airport, also run by Massport, is highly underutilized and it could use the business. It should also be noted that a plane departing Hanscom on a ferry flight for that purpose would be light and quiet and would climb quickly with a minimal impact on the environment. It's difficult to fathom a rationale that favors paving over 39 acres, destroys natural watershed and habitat to prevent that occasional flight.

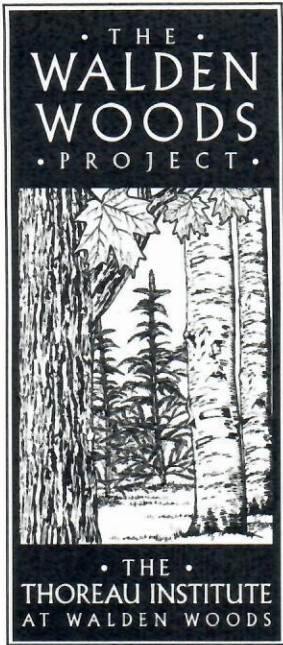
No, this project will greatly damage the Hanscom area as it will attract new traffic. On behalf of my neighborhood, the other users of Hanscom and the greater good, please do not permit this project to proceed.

Sincerely,

Susan Foster Jones  
31 Minot Rd., Concord, MA 01742

cc: Concord Select Board, Matthew Johnson, chair  
Erin Stevens, Transportation and Mobility Planner, Concord  
Office of Governor Maura Healy

Marcia Rasmussen, Director DPLM  
HATS, Linda Escobedo, Concord liaison  
Melissa Hoffer, MA Climate Chief



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phone: 781.259.4700  
fax: 781.259.4710

e-mail: [wwproject@walden.org](mailto:wwproject@walden.org)  
website: [www.walden.org](http://www.walden.org)

**Don Henley**  
*Founder and President*

**Kathi Anderson**  
*Executive Director*

February 14, 2023

Mr. Alexander Strysky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02113

Dear Mr. Strysky:

**“RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF”**

As the Executive Director of The Walden Woods Project, I submit the following comments relative to the above-referenced project.

The Walden Woods Project (WWP), a 501(c)(3) nonprofit organization, is headquartered in Lincoln, MA, a half mile from Walden Pond. Founded in 1990, The WWP preserves the land, literature and legacy of Henry David Thoreau to foster an ethic of environmental stewardship and social responsibility. Since its inception, The WWP has received extensive federal, state and private sector funding to further our vital mission. To date, we have preserved nearly 200 acres of land in Walden Woods (Concord and Lincoln) for public enjoyment and education. We offer outdoor education programs for a highly diverse population of teachers, students and the general public. These programs connect Thoreau’s philosophy to address contemporary environmental (e.g., climate change) and social reform (e.g., human rights) challenges.

Walden Pond and the historic woods that surround it were declared one of America’s most threatened National Historic Landmarks by the National Park Service, and were twice listed by the National Trust for Historic Preservation as one of America’s Most Endangered Historic Places due to increasing pressures and impacts of regional development.

Our organization joins with dozens of other nonprofit groups, town governments, state agencies, the National Park Service, the U.S. Fish and Wildlife Service and others in working to ensure that the rich ecological and historical assets that abound in the Hanscom-area communities are protected for future generations.

The WWP is deeply concerned by:

- (a) the proposal to double the amount of hangar space and build other infrastructure to support increased aircraft operations at Hanscom Field ;
- (b) the lack of specific data and details concerning environmental impacts of this proposal; and
- (c) the inadequate amount of time afforded stakeholders to comment on a proposal of this magnitude.

Of particular concern to our organization are the following issues:

1. At a time when our local, regional, statewide, national and international efforts are laser focused on addressing the existential threat of climate change, we must redouble our efforts to reduce our dependence on fossil fuels. However, this project seeks to expand the infrastructure (increasing hangar space; upgrading taxiway and runway capacity, constructing a "fuel farm") that will increase private, corporate and/or commercial jet aviation, a major contributor to the climate change crisis. Furthermore, it requires the clearing of some 34 acres of woodland – extensive tree cutting -- with the resulting negative impacts to carbon sequestration.
2. Noise disruption from Hanscom has, for many years, caused a severe, detrimental impact to the outdoor environment in the surrounding communities, specifically at Walden Pond/Walden Woods. The trajectory from runways 5/23 and 11/29 take low flying aircraft directly over our organization's headquarters and over Walden Pond. The Hanscom runways are only 2 miles from Walden Pond. The WWP's educational presentations for school groups, held at our campus and at Walden Pond, are frequently interrupted by jet aircraft noise. The Hanscom expansion proposal will likely worsen existing noise pollution, as well as increase air quality impacts.
3. An abundance of natural resources (wildlife, woodlands, meadows, ponds, rivers) are found in the Hanscom area communities. These include those within Minute Man National Historical Park, Great Meadows National Wildlife Refuge, the SuAsCo Wild and Scenic River system, Walden Pond State Reservation, as well as hundreds of acres of public and private conservation land. The Hanscom expansion project must be fully evaluated to determine how these natural resources will be impacted.

The Walden Woods Project strongly opposes the Hanscom expansion proposal. We believe that this project will generate profound and permanent detrimental impacts to the ecological, historic and natural environment of the Hanscom area communities, and to the people who reside in this nationally-significant region.

Sincerely,



Kathleen R. Anderson, Executive Director

**From:** [Thomas Kenny](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 12:53:48 PM

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Thomas and Joan Kenny  
98 Hartwell Road  
Bedford Ma 01730  
(781) 275-4725  
[bondcliff@verizon.net](mailto:bondcliff@verizon.net)

Dear sirs

I am writing in opposition to the expansion of private jet and personal aircraft storage and operation at Hanscom Airport.

This proposed project will result in a 50% increase over existing operations and will result in more air, noise and light pollution to surrounding communities as well as encourage more flights throughout the State.

In the spirit of reducing greenhouse emissions as well as discouraging the expansion of private corporate and individual jet use, allowing this project to proceed is not in line with the goals of reducing global warming.

There is also the local impact to the many residents to the risk of pollution to water, air, noise and light that is detrimental to their well being.

There is also a proposal of locating a new fuel farm to supply these private jets and aircraft close to residential areas and adjacent to a soccer field and ice hockey rink that is very heavily used by the region's children. There has already been a devastating loss to the town of Bedford to its ground water well system caused by leakage from the airport, which it has never recovered from.

Placing this huge new hangar facility at Hanscom to provide for a few private jet owners and a few extra dollars of revenue for Massport, at the detriment of an entire local community is short sighted to the long term goals of reducing this type of society we are now striving for. Again I implore that this project be rejected.

Thank You  
Thomas and Joan Kenny  
98 Hartwell Road.  
Bedford, Ma 01730  
781-275-4725



**From:** [Timothy Jones](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 6:38:04 PM

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February 11, 2023

Mr. Alexander Strycky, MEPA Office -email  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: North Airfield Hangar Development Proposal

Dear Mr. Strycky:

I am writing in strong opposition to the proposed 49 acre North Airfield hangar development proposed by Runway Realty Ventures, LLC and North Airfield Ventures, LLC in their January 23, 2023 ENF.

The premise of this project is that it will result in a net benefit to the environment by limiting the number of ferry flights required by aircraft due to insufficient space currently available at Hanscom Field.

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No, this project will greatly damage the Hanscom area as it will attract new traffic. On behalf of my neighborhood, the other users of Hanscom and the greater good, please do not permit this project to proceed.

Sincerely,

Timothy M. Jones  
31 Minot Rd., Concord, MA 01742

cc: Concord Select Board, Matthew Johnson, chair  
Erin Stevens, Transportation and Mobility Planner, Concord  
Office of Governor Maura Healy

Marcia Rasmussen, Director DPLM  
HATS, Linda Escobedo, Concord liaison  
Melissa Hoffer, MA Climate Chief

**From:** [Grotzer, Tina](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Hanscom Proposed Plan Public Comment  
**Date:** Tuesday, February 14, 2023 3:45:57 PM

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I would like for the following question/concern to be addressed:

Significant research exists to demonstrate that air traffic near schools has a negative impact on the health and learning of the students. There are a number of educational programs/schools within a very short distance of the proposed project (including those immediately adjacent at Middlesex Green: Tremont School and The Guild for Human Services). What is being done to ensure that there will be no additional (beyond the current status quo) air traffic during school hours and that the planes that do take off are not larger and louder than those that currently use the airfield? Please outline the plans to protect the students in these and other local schools as these uses pre-exist the proposed use and because the proposed use has the potential to cause damage that outsizes other property uses and to have substantial negative impact on these schools. This is an equity/injustice issue given the learners served by these programs.

Thank you!

---

Tina A. Grotzer  
Faculty of Education, Harvard University  
Principal Research Scientist, Cognition in a Complex World Lab, Project Zero  
Faculty Director, Next Level Lab: Applying Learning Sciences to Access, Innovation, and Mastery (AIM)  
421 Longfellow Hall, 13 Appian Way, Cambridge, MA 02138 PH: (617) 496-4386  
[Tina\\_Grotzer@harvard.edu](mailto:Tina_Grotzer@harvard.edu)  
<https://clic.gse.harvard.edu/>  
<https://nextlevellab.gse.harvard.edu/>

**From:** [Sheila Page](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** : Notice of MEPA Site Visits - EEA# 16654 L.G. Hanscom Field North Airfield Development, Bedford  
**Date:** Tuesday, February 14, 2023 5:02:52 PM

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Comments from Lexington:

To: Massachusetts Environmental Policy Act Office

From: Sheila Page

**Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF**

Date: February 14, 2023

As Hanscom Airfield has grown and expanded over the years, the incremental increases in, aircraft traffic, noise, and air pollution has eroded the quality of life for residents and wildlife and diminishes the visitor experience. The flight path runs directly over Environmental Justice Areas in Lexington, federally-owned Great Meadows Wildlife Refuge, the Minute Man National Historical Park and the Battle Road Scenic Byway. We are concerned about the impact to our residents health and as well as these unique cultural and environmental resources.

The Draft Environmental Impact Report should include both qualitative and quantitative information that addresses questions of increase air traffic and subsequent air quality, noise and visual intrusions.

In addition this projects impact on climate change should also be addressed. The increase in impervious pavement and the resultant loss of the woodland and grassland areas in the area proposed for development will create a "heat-island" effect that may impact surrounding neighborhoods and businesses without mitigation measures taken How will groundwater be protected in the event of a fuel spill or similar occurrence. Has there is any spills in the past? Is any mitigation needed now for past contamination events?

The four communities encircling Hanscom are working to reduce their respective carbon footprints. The carbon footprint of the proposed use should be evaluated, including both direct impacts from new impervious surface as well as increased fuel usage.

Airplane exhaust severely diminishes air quality. We should clearly understand the increased air traffic's impacts. In addition, this is an opportunity to be a leader to in sustainable aviation. We would like to know more about the fuels and fuel storage.

THANK YOU !

**Sheila Page**  
Assistant Planning Director

**Town of Lexington**

1625 Massachusetts Avenue  
Lexington, Massachusetts 02420

[spage@lexingtonma.gov](mailto:spage@lexingtonma.gov)

781-698-4563

---

**From:** Strysky, Alexander (ENV) <alexander.strytsky@state.ma.us>  
**Sent:** Monday, February 13, 2023 3:13 PM  
**To:** Sheila Page <spage@lexingtonma.gov>  
**Subject:** RE: Notice of MEPA Site Visits - EEA# 16654 L.G. Hanscom Field North Airfield Development, Bedford

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Hi Sheila- Thanks for your email. This project requires mandatory Draft and Final EIRs. The certificate that will be issued on the 2/24 will consist primarily of a review of public comments and a detailed Scope which will specify the information and analyses the proponent must provide in the DEIR. The DEIR (and FEIR) will also be subject to public review and comment.

Alex

Alex Strysky  
MEPA Office  
100 Cambridge Street  
Boston, MA 02114  
Cell: (857) 408-6957

***Please note that the EEA EJ Maps Viewer was updated and will apply to MEPA filings starting January 4, 2023. See [here](#) for additional guidance.***

***The MEPA Office has amended 301 CMR 11.00 for promulgation on January 6, 2023. See [here](#) for details.***

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**From:** Sheila Page <[spage@lexingtonma.gov](mailto:spage@lexingtonma.gov)>  
**Sent:** Monday, February 13, 2023 3:05 PM  
**To:** Strysky, Alexander (EEA) <[alexander.strytsky@mass.gov](mailto:alexander.strytsky@mass.gov)>  
**Subject:** RE: Notice of MEPA Site Visits - EEA# 16654 L.G. Hanscom Field North Airfield Development, Bedford

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recognize the sender and know the content is safe.

Hi Alex - I am a little vague on the process. This is a just a notification, right? Will there be a full EIR? Or only if MEPA decides it is necessary....which is why there are public comments now? Given public comment – MEPA may decide to require a full EIR or decide that one is not necessary - is that right?

Thanks,  
Sheila

**Sheila Page**  
Assistant Planning Director  
Town of Lexington  
1625 Massachusetts Avenue  
Lexington, Massachusetts 02420

[spage@lexingtonma.gov](mailto:spage@lexingtonma.gov)  
781-698-4563

---

**From:** Strysky, Alexander (ENV) <[alexander.strytsky@state.ma.us](mailto:alexander.strytsky@state.ma.us)>  
**Sent:** Monday, January 30, 2023 6:44 PM  
**To:** ([patrick@mysticriver.org](mailto:patrick@mysticriver.org)) <[patrick@mysticriver.org](mailto:patrick@mysticriver.org)>; Adam Horst <[horstaf@bwsc.org](mailto:horstaf@bwsc.org)>; Adam Turner <[turner@mvcommission.org](mailto:turner@mvcommission.org)>; Alice Brown <[abrown@bostonharbornow.org](mailto:abrown@bostonharbornow.org)>; Alison Felix <[afelix@mapc.org](mailto:afelix@mapc.org)>; [avorce@nantucket-ma.gov](mailto:avorce@nantucket-ma.gov); Backman, Andy (DCR) <[andy.backman@state.ma.us](mailto:andy.backman@state.ma.us)>; Boeri, Robert (ENV) <[robert.boeri@state.ma.us](mailto:robert.boeri@state.ma.us)>; Brad Washburn <[BWashburn@massport.com](mailto:BWashburn@massport.com)>; Briggs, Andrea (DEP) <[andrea.briggs@state.ma.us](mailto:andrea.briggs@state.ma.us)>; Burtner, Jason (ENV) <[jason.burtner@state.ma.us](mailto:jason.burtner@state.ma.us)>; Woods, Beverly (NMCOG) <[bwoods@nmcog.org](mailto:bwoods@nmcog.org)>; Cape Cod Commission <[regulatory@capecodcommission.org](mailto:regulatory@capecodcommission.org)>; Carr, Jillian (FWE) <[jillian.carr@state.ma.us](mailto:jillian.carr@state.ma.us)>; Central Massachusetts Regional Planning Commission <[jpierce@cmrpc.org](mailto:jpierce@cmrpc.org)>; Kilmer, Charlie (OCPC) <[ckilmer@ocpcrpa.org](mailto:ckilmer@ocpcrpa.org)>; Cheeseman, Melany (FWE) <[melany.cheeseman@state.ma.us](mailto:melany.cheeseman@state.ma.us)>; [Christopher.Boelke@Noaa.gov](mailto:Christopher.Boelke@Noaa.gov); Czepiga, Page (EEA) <[page.czepiga@state.ma.us](mailto:page.czepiga@state.ma.us)>; Stewart Dalzell <[SDalzell@massport.com](mailto:SDalzell@massport.com)>; Dan Doyle <[doyle@mvcommission.org](mailto:doyle@mvcommission.org)>; Deanna Moran <[dmoran@clf.org](mailto:dmoran@clf.org)>; DMF EnvReview-North (FWE) <[dmf.envreview-north@state.ma.us](mailto:dmf.envreview-north@state.ma.us)>; Doyle, Alice (DEP) <[alice.doyle@state.ma.us](mailto:alice.doyle@state.ma.us)>; [Eric.Hutchins@noaa.gov](mailto:Eric.Hutchins@noaa.gov); Evans, Tay (FWE) <[tay.evans@state.ma.us](mailto:tay.evans@state.ma.us)>; zzzFerguson, Jana (DPH) <[jana.ferguson@mass.gov](mailto:jana.ferguson@mass.gov)>; zzzFlaherty, Erin (EEA) <[erin.flaherty@mass.gov](mailto:erin.flaherty@mass.gov)>; Fournier, Kathleen (DEP) <[kathleen.fournier@state.ma.us](mailto:kathleen.fournier@state.ma.us)>; Fragata, Carlos (DEP) <[carlos.fragata@state.ma.us](mailto:carlos.fragata@state.ma.us)>; Galvin, Mike (DCR) <[mike.galvin@state.ma.us](mailto:mike.galvin@state.ma.us)>; Gary Roux <[gmroux@PVPC.ORG](mailto:gmroux@PVPC.ORG)>; Gilmore, Daniel (DEP) <[daniel.gilmore@state.ma.us](mailto:daniel.gilmore@state.ma.us)>; Glenn, Kathryn (ENV) <[kathryn.glenn@state.ma.us](mailto:kathryn.glenn@state.ma.us)>; Gomes, Jeffrey R (DOT) <[jeffrey.r.gomes@state.ma.us](mailto:jeffrey.r.gomes@state.ma.us)>; Greene, Andrew (DPU) <[andrew.greene@state.ma.us](mailto:andrew.greene@state.ma.us)>; Haines, Samuel (ENV) <[samuel.haines@state.ma.us](mailto:samuel.haines@state.ma.us)>; Haney, Rebecca (ENV) <[rebecca.haney@state.ma.us](mailto:rebecca.haney@state.ma.us)>; Hill, David (DEP) <[david.hill@state.ma.us](mailto:david.hill@state.ma.us)>; Hobill, Jonathan (DEP) <[jonathan.hobill@state.ma.us](mailto:jonathan.hobill@state.ma.us)>; Hopps, Christine (DEP) <[christine.hopps@state.ma.us](mailto:christine.hopps@state.ma.us)>; Hopson, Barbara (AGR)

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**Subject:** Notice of MEPA Site Visits - EEA# 16654 L.G. Hanscom Field North Airfield Development, Bedford

**USE CAUTION:** This email came from outside the Town of Lexington. **Do not** click links, open attachments or respond to the email **unless** you recognize the sender, you are expecting the communication and you know the content is safe.

#### NOTICE OF MEPA REMOTE AND IN-PERSON SITE VISITS

EEA 16654 L.G. Hanscom Field North Airfield Development, Bedford

Project Description: An [Environmental Notification Form \(ENF\)](#) (**please note: this is a link to only a small portion of the ENF; see below to obtain a full copy**) has been filed with the Executive Office of Energy and Environmental Affairs by Runway Realty Ventures, LLC and North Airfield Ventures, LLC to construct 27 hangars and renovate the existing Navy Hangar building to provide a combined area of 495,470 square feet (sf) of hangar space. The project involves land transfers between the Proponent and Massport, including a 28.1 -acre Massport Ground Lease area and transfer of two parcels totaling 5.2 acres from Massport to the Proponent. In addition, the Proponent will transfer a 2.6-acre parcel to Massport to provide a Taxiway Object Free Area and a perimeter access road. The project will alter 23.2 acres of land; add 23.9 acres of impervious area; construct 175 New parking spaces for a total of 240 spaces including existing spaces; generate 194 average daily vehicle trips, use 13,500 gallons per day (gpd) of water and generate 12,150 gpd of wastewater. The project site is located within an Environmental Justice population designated as Minority and within a mile of additional EJ populations.

The project meets the threshold for a mandatory EIR at 301 CMR 11.03(1)(a)(2), creation of 10 or more acres of impervious area. The project requires preparation of an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a Designated Geographic Area (or DGA) (as defined in 301 CMR 11.02) around one or more EJ populations. The project requires a Land Transfer from Massport to the Proponent.

The MEPA Office will conduct both an in-person site visit and a remote consultation session. The public is welcome to participate in either or both of the meetings.

**In-person site visit: 3:00 PM on Monday February 6, 2023. We will meet at the site, which is accessed off Hartwell Road.**

**Remote consultation session: The public consultation session will take place at 6:30 PM on Monday February 6, 2023. See below for a meeting link and call-in phone number.**

MEPA comments due on or before: February 14, 2023

Certificate due: February 24, 2023

Contact for Project Information: Ken Schwartz, (617) 607-2156, [kschwartz@vhb.com](mailto:kschwartz@vhb.com)

MEPA Contact: Alex Strysky, (857) 408-6957, [alexander.strytsky@mass.gov](mailto:alexander.strytsky@mass.gov)

Comments may be submitted my email to [alexander.strytsky@mass.gov](mailto:alexander.strytsky@mass.gov) or via the [MEPA Public Comments Portal](#).

Zoom meeting link for remote site visit on Monday February 6 at 6:30 PM:

<https://vhb.zoom.us/j/84330574548?pwd=eThiOXY3a05YQWRzcGphKzZ0aFpYZz09>

Alex Strysky  
MEPA Office  
100 Cambridge Street  
Boston, MA 02114  
Cell: (857) 408-6957

***Please note that the EEA EJ Maps Viewer was updated and will apply to MEPA filings starting January 4, 2023. See [here](#) for additional guidance.***

***The MEPA Office has amended 301 CMR 11.00 for promulgation on January 6, 2023. See [here](#) for details.***

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**From:** [Sheila Page](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Comments: EEA# 16654 L.G. Hanscom Field North Airfield Development, Bedford  
**Date:** Tuesday, February 14, 2023 5:15:25 PM

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Alex -0 We have few more questions to included in the comments period.

1. What is the size in square feet of the additional building(s) and hangar space that will be constructed as part of this project?
2. What type of HVAC systems will be used to heat and cool the building and hangar space?  
What type of fuel will be used to heat and cool the space?
3. What is the estimated amount of fuel that will be used to heat and cool the buildings and hangar space on an annual basis?

THANK YOU

**Sheila Page**

**Assistant Planning Director**

**Town of Lexington**

1625 Massachusetts Avenue

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United States Department of the Interior

FISH AND WILDLIFE SERVICE



Eastern Massachusetts National Wildlife Refuge Complex  
73 Weir Hill Road  
Sudbury, MA 01776-1420

February 14, 2023

Alexander Strysky, Environmental Analyst  
Massachusetts Environmental Policy Act Office  
100 Cambridge Street  
Suite 900  
Boston, MA 02114

Re: L.G. Hanscom Field North Airfield Development Environmental Notification Form (January 2023)-  
EEA #16654

Dear Mr. Strysky,

The US Fish and Wildlife Service (FWS) has reviewed the recent documentation by Runway Realty and North Airfield Ventures, LLCs via VHB for the L.G. Hanscom Field North Airfield Development proposal to the Massachusetts Environmental Policy Act Office (MEPA Office). Great Meadows National Wildlife Refuge, Concord Unit off Monsen Road in Concord located less than two miles away from the proposed project location. In response to the Environmental Notification Form (ENF) submitted by the proponent to your office, the FWS has concerns about the proposed projects impacts to wildlife, traffic, noise & air pollution.

Great Meadows National Wildlife Refuge (Refuge) was established May 3, 1944, under the authority of the Migratory Bird Conservation Act (16 U.S.C. § 715d) and Refuge Recreation Act (16 U.S.C. § 460k-1) for use as an inviolate sanctuary, or for any other management purpose, for migratory birds. (16 U.S.C. § 715d). We manage the Refuge for the protection of natural resources, (16 U.S.C. § 460k-1), the conservation of threatened or endangered species (16 U.S.C. § 460k-1) and allow for incidental fish and wildlife-oriented recreational development. (16 U.S.C. § 460k-1).

The Refuge is a 3,874-acre collection of parcels of land located approximately 20 miles west of Boston, in the historic towns of Concord, Sudbury, Bedford, Billerica, Lincoln, Carlisle, and Wayland. Great Meadows NWR stretches 12 miles from State Route 4 in Billerica to the Framingham/Wayland town line along the Concord and Sudbury Rivers. The refuge provides habitat for a variety of species, including migrating waterfowl, shorebirds, wading and marsh birds. The upland areas support woodcock, songbirds, and many raptors. The marsh habitats are utilized by amphibians and reptiles. The Refuge attracts over 460,000 visitors a year and is a favorite bird watching and hiking spot in the area. Currently, the Refuge is impacted by the sounds of aircraft flying over and its disturbance to wildlife and visitors. Any project which could further exacerbate these current issues is a real concern for Refuge Management.

In reading through the analysis in the ENF and after attending the 2/6/23 presentation it is still unclear how the project would impact Federal Trust Species. In a cursory review of the project area in the FWS Information for Planning and Consultation Tool (IPAC) the project overlapped species ranges for Northern Long-eared Bat, Monarch Butterflies, and 14 migratory birds. The federal permitting for the overall project through the Federal Aviation Administration and the Environmental Protection Agency triggers both the National Environmental Policy Act (NEPA) and Section 106. Please add us to the distribution list for future notifications related to this project and work with the FWS' New England Field Office in Concord, NH on the NEPA review and mitigate any impacts to federal trust resources.

Sincerely,



Linh D. Phu  
Refuge Complex Manager  
Eastern Massachusetts National Wildlife Refuge  
Linh\_phu@fws.gov  
Mobile: 571-423-6698

Cc:

David Simmons, USFWS New England Field Office  
Simone Monteleone, NPS-Minute Man National Historical Park  
Emma Lord, NPS SUASCO W&S River Partnership

**From:** [Valerie Gurney](#)  
**To:** [Stryisky, Alexander \(EEA\)](#)  
**Cc:** [drvaleriegurney@gmail.com](mailto:drvaleriegurney@gmail.com); [Matthew Daniel](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 10:44:14 PM

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Mr. Alexander Stryisky  
MEPA Office                      14 February 2023  
100 Cambridge St., Suite 900  
Boston, MA 02114  
[Alexander.Stryisky@mass.gov](mailto:Alexander.Stryisky@mass.gov)

RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Stryisky,

I am a Bedford resident and a mother of two children. We live on South Road near the north airfield side of Hanscom Airport in a neighborhood of 55 single family homes each with two to four children. We strongly oppose this massive expansion project that will have a severe negative impact on the health and quality of life of children and families in Bedford. There will be additional substantial negative environmental impact as well. Premium air travel for a few corporate elite at the expense of the health of our children, families and our environment is not acceptable.

This airport expansion will contribute to air and noise pollution for the thousands of residents who live near the airport. In addition, within a quarter to half mile of the proposed expansion, there are multiple athletic fields where children will be playing much of the time. The noise pollution from larger aircraft as well as the air pollution will not only have a negative impact on these children but could endanger their health. This expansion project, over a 50% expansion in square footage, will result in children being exposed to lead and other carcinogenic emissions.

The airport expansion is also a colossal step backwards in our efforts against climate change, an existential threat to our planet. This expansion negates all the efforts Massachusetts has made towards reducing our carbon footprint. Massachusetts has been leading the way to reduce our carbon footprint. As we have seen change at such an accelerated pace, it is of the utmost importance to not contribute to further climate endangerment. To propose an expansion of this magnitude as we face an unprecedented existential crisis of climate catastrophe is profoundly irresponsible, disappointing and dangerous. This expansion is proposed in a densely populated area with families with young children in close proximity. If we allow this expansion, then we are failing not only our planet but our children.

By Massport's own admission previously, the goals of this project are to increase profitability of the airport and to provide private jet travelers a more luxurious and private travel experience. This expansion is a money grab catering to the corporate elite at the expense of local children, families and the environment.

Reference is made to the letter HFAC submitted in opposition to this expansion project and

all comments incorporated herein. Additionally, please find concerns below including but not limited to the following:

- Increased jet traffic, carbon, lead & other poisonous gas emissions, and noise, including jet engine startups, taxiing and maintenance
- The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase.
- Health and safety effects to our children and families, living close to the airport, in particular, for all kids playing on The Edge and South Road fields
- The overall impact of this airport on climate change is certain to be harmful to our planet
- There will be aircraft refueling (possibly with underground tanks) directly over an aquifer near a former Superfund site and yards away from Hartwell Road
- There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced
- Over 34 acres of forest with mature trees will be cleared and paved over, creating an overheated microclimate
- Hanscom Field adjoins Great Meadows National Wildlife Preserve. Therefore, this project will endanger protected wildlife
- There will be increased road traffic (including trucks) both pre and post construction along with air contamination during construction
- There will be huge water runoff in storms (with some fuel contamination)
- There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments
- This is for the benefit of corporate executives and companies that can afford to buy and use private jets

Based upon the aforementioned concerns, we strongly oppose the North Airfield Development project.

Sincerely,

Valerie Gurney and Matt Daniel

17 Liberty Rd.

Bedford, MA 01730

**From:** [rvlemire@verizon.net](mailto:rvlemire@verizon.net)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 10:30:04 AM

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I object to the expansion of Hanscom Air Field.

1. The amount of air and ground traffic is well beyond what the surrounding area can absorb.
2. The air pollution created by more air and ground traffic is well beyond standards and the solutions that have been painfully implemented in the area so far in our goal of reduced emissions.
3. The massive increase in asphalt coverage is harmful for ground water, wildlife corridors, and increased heat produced.
4. Air pollution under flight patterns is unacceptable to wildlife, people, and agriculture.
5. Noise created by the increased air traffic is unacceptable to people. It disrupts sleep patterns and other bio rhythms.
6. This seems to me to be the first steps in making this air field a commercial alternative to Logan **I stongly object.**

Why does this area have to accept the disruption brought about by people with money who can use their private plains to lower our environment?

Virginia Lemire  
1 Harvest Circle Unit 208  
Lincoln, Mass 01773



**From:** [Virginia Welles](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654 L. G., Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 9:41:54 PM

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To the MEPA Administrator Feb. 14, 2023

I write because I am deeply concerned about the proposed new L. G. Hanscom Field North Airfield Development.

Plans for a significant amount of development at Hanscom for the North Airfield area near Hartwell Road in Bedford have recently come to light through the details submitted to MEPA in an ENF (Environmental Notification Form).

If I understand it correctly, the proposed development includes:

- building an additional taxi lane and an additional service road
- reconfiguring Taxiway Romeo to support larger, heavier aircraft
- adding 500,000 sq ft of hangar space in 27 buildings covering almost 50 acres of open land
- and it proposes a Land Swap & Access Agreement is between Runway Realty Ventures (the private owner of the former Navy parcel) and Massport

I note that this proposed project will impact all of the surrounding towns but is exempt from all local regulations which is why it is imperative MEPA require a full and thoughtful Environmental Impact Report to include appropriate mitigation measures for the negative environmental impacts that will result from the proposed development, including a possible significantly scaled down proposal..

This project is not in keeping with Massachusetts' climate change reduction goals, nor with Federal goals, and we need to get it changed.

The proponent argues without evidence that the resulting massive expansion of air traffic will reduce environmental impact at Hanscom and help achieve a net zero goal. Yet, a single private jet flight to Europe generates more greenhouse gas emissions than a family in India does in an entire lifetime.

The developers failed to mention that:

- (1) it would increase fossil fuel emissions,
- (2) it would increase potential for water contamination (for which Hanscom has a poor record),
- (3) it would develop open land, destroying current ecosystem benefits, and
- (4) it would pose an extra burden on environmental justice communities nearby.

This development would primarily benefit private companies and wealthy individuals, and

does not benefit the surrounding communities of Lincoln, Bedford, Lexington, and Concord. It increases noise, light pollution, increases the number and size of planes that can fly into and out of Hanscom and creates even more pollution than currently exists. It takes us further away from State and Federal climate change reduction goals. We should definitely not be making it easier to use private planes.

I urge MEPA to require a full Environmental Impact Report on this proposed expansion.

Thank you for the opportunity to submit my comments.

Sincerely,  
Virginia Welles

42 Bedford Road  
Lincoln, MA 01773

**From:** [Jena Salon](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 4:30:44 PM

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**Alexander Strysky**  
**MEPA Office**  
**100 Cambridge St., Suite 900**  
**Boston, MA 02114**  
[Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)  
**(857) 408-6957**

**February 14, 2023**

**Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF**

Dear Mr. Strysky:

This letter is submitted on behalf of WIDE Lincoln, a collective of Lincoln, MA residents and employees that serves to help the town of Lincoln create and sustain a welcoming, inclusive, and diverse culture that actively supports the equitable and just treatment of all individuals in the community. We are extremely concerned about the proposed extensive North Airfield development and its impacts on environmental justice populations, as defined by the state's Executive Office of Energy and Environmental Affairs.

Housing for low- and moderate-income families is limited in Lincoln, and a majority of units can be found in North Lincoln in close proximity to the Airfield. Historically, communities chose to place housing units like this in the least desirable sections of town—across highways, next to airports, near town transfer stations. Lincoln is no different than the rest of the country. The outcome being that in Lincoln, the Battle Road Farm and Minuteman Commons housing units are heavily populated by those who are most impacted by structural and systemic barriers—people of color, those on fixed incomes (i.e., the elderly, those with disabilities, and veterans), and single parents. In addition, there are over 600 students and their families living on Hanscom Airforce Base, who we consider part of the Lincoln Community.

The proposed expansion of the Hanscom Field North Airfield Development will not only impact the general environment of Lincoln and the surrounding towns—increasing water, air, soil, and noise pollution for all—but will most intensely impact the environmental justice communities who live in closest proximity. This means that the individuals and families who are the most marginalized, will experience a marked decrease in quality of life so that wealthy

individuals with private jets, can have better access to a more desirable airport.

The statistics and information available on flight patterns is not sufficient. As noted in the March 17, 2022 Testimony Before the Subcommittee on transportation and Infrastructure, House of Representatives Aviation by the Heather Krause, Director of Physical Infrastructure for the U.S. Government Accountability Office (GAO) “Currently, FAA assesses the potential noise impact of proposed flight path changes (such as PBN procedures) on locations within the area surrounding an airport by using the Day-Night Average Sound Level (DNL) metric. Our analysis showed that because DNL takes into account both the amount of noise from each aircraft operation, as well as the average annual flights per day at a given location, the same DNL may be associated with vastly different numbers of flights above that location. As such, DNL does not provide a clear picture of the flight activity or associated noise levels at a given location. For example, as shown in figure 1, 100 flights per day can yield the same DNL as one flight per day at a higher decibel level.” We request transparent and accurate data be provided.

Noise will be the most obvious impact, but the increase of traffic, noise, and pollution can have significant medical impacts on families, increasing mortality and chronic illnesses, and increasing medical bills. We do not feel sufficient information has been provided about these impacts or the true value of planned “mitigation”.

The desirability of these neighborhoods will be lowered, decreasing home values for those in already disadvantaged financial positions, and in some cases, forcing families to stay.

A portion of the communities around Hanscom Airfield are environmental justice populations. These are communities already burdened by noise pollution and water quality concerns, including lead contamination in water. EEA #16654 would only increase burdens on these communities. We do not believe the planning process sufficiently included the voices and input of surrounding environmental justice communities.

We believe EEA #16654 is prioritizing profit and privilege over people—especially those who have already been harmed. We are particularly concerned about development that enables further fossil fuel emissions, as in this case. We urge you to rethink EEA #16654 and bring in broader community engagement, including from environmental justice communities.

Respectfully submitted,  
Jena Salon  
On Behalf of WIDE Lincoln

WIDE Lincoln  
Moha Desai  
Marika Hamilton

Jessica Packineau

Abbey Salon

Jena Salon

Rachel Marie Schachter

Hope White

**From:** [Bill](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Re: Proposed Hanscom North Airfield Development  
**Date:** Tuesday, February 14, 2023 4:23:22 PM

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**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To all concerned parties,  
I am writing in full opposition to the proposed Hanscom North Airfield Development. I say tear down what is there, plant trees and let it be as an effective buffer zone between the people of the area beyond that zone and the existing airport. Whatever is at Hanscom is there, grandfathered in, be happy. I consider the existing building to be abandoned and should be demolished. Note: see historic notes below

Supportive statements:

**The proposed expansion is a blatant example of Class Warfare.** By proposing this expansion, you are suggesting that the convenience of a select few overrides the health, safety and solitude of the people that call Bedford, Lincoln, Lexington and Concord their home. Over 99% of us will NEVER step foot in a private jet. The people who will benefit from this Development represent a tiny fraction of one percent of the population, whereas those it affects make up over 99% of the population.

Don't expect the masses to sympathize with Billionaires or corporate or State interests that will profit from this project.

**Put People before Profits or convenience.**

**No supporting evidence or Data was offered to the people** during the site visit or the evening ZOOM call with over 140 residents. When asked, none of the EXPERTS on the panel could offer any data to support the NEED for this project. That to me is gross negligence. You don't pitch a project like this without any supporting data.

Just saying that the project would reduce "Ferry Flights" is not enough.

Some of the panelists used the word "think". Think and feel is different than FACT.

It must be embarrassing.

Whatever the data says, if it exists, I'm sure it is debatable. I have an Engineering and a Mathematics degree and would love to see the data.

**Historic value of the existing building:**

**I have 21 years of professional experience in Historical Tours of the Lexington Concord area. It has some of the richest Colonial, Revolutionary and Literary history anywhere on earth.**

Less than 10 minutes away from the proposed development is:

Walden Pond State Reservation - of Thoreau fame

Orchard House - of Louisa May Alcott fame

Lexington Green - Mentioned in every American History book

Borth Bridge - Mentioned in every American History book

Etc etc etc. I could go on and on.

The history of the building on the proposed site pales in comparison compared to these other sites. **Mentioning the "history" of this building is a ploy to charm residents into thinking it is worth saving and to support the project. Tear it down, plant trees. That is my professional opinion as a professional local historian. Some things are not worth saving.**

**Solar arrays at the proposed site: Again a ploy to charm the residents.  
Any of these ploys are offset by the TOXIC LEAD and other respiratory toxins dropping  
from the sky into the lungs of families in these 4 towns.**

**Lastly, the fact that the "Panel" decided not to share the recording of the public ZOOM  
session is very suspicious and disturbing. What happened to open communication and  
transparency?**

I am interested in any response from ANYONE on my points outlined above.  
A minute of my day hardly goes by when I cannot hear a jet engine blaring in the distance.  
I truly pity and pray for the residents closer to the Airport.

WJF

**William J. Freitas  
35 N Great Road  
Lincoln, MA 01773**

**From:** [William Stason](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA: #16654 L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 14, 2023 7:27:04 PM

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**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Alexander Strysky,

I live at 2A N Commons in Lincoln, MA and I am strongly against any expansion of the airfield at Hanscom.

For one thing it is already challenging living here. My family and I (my wife and our two boys ages, 15 and 11) often can smell jet fuel that just settles around our home when the wind is calm. It gives us a headache and we immediately go inside and make sure all windows and doors of our home are closed. An expansion would just make this awful and dangerous aspect to living here even worse. Also the noise from the jets and propeller planes are a nuisance.

Furthermore the environmental impact on wildlife and the climate would be terrible.

Please stop this proposed expansion that seems to only benefit a few while hurting the many.

Thank you for doing the right and decent thing.

Sincerely,

William Stason



**From:** [Igor Dobrusin](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Wednesday, February 15, 2023 1:59:59 PM

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Hello,

I am a resident of Lincoln, MA, and I am concerned about the proposed expansion of Hanscom. This proposed development is unacceptable on many levels. I'm particularly concerned about the following impacts:

- Increased aircraft operations and ground travel
- Noise, air, water, and soil pollution
- Public health
- Environmental Justice populations
- Climate change
- Wildlife
- Mature tree removal

I agree with the Mother's Out Front Lincoln Public Comment, pasted below:

Mothers Out Front Lincoln Public Comment in Response to EEA #16654  
February 3, 2023

Mothers Out Front Lincoln opposes the proposed development and expansion of Hanscom Field North Airfield. Our Lincoln team is an ambitious group of mothers, grandmothers, and caregivers ready to take on the many important environmental challenges we face, both locally and globally. We are excited to be joining a powerful grassroots movement to ensure a swift, complete, and just transition away from fossil fuels. We believe EEA #16654 would negatively impact our community and contribute to climate change and environmental degradation at a time when we are trying to move toward net-zero. Further, we have concerns about the impacts of expansion on environmental justice communities.

Climate change is an emergency that requires urgent action to move away from fossil fuel emissions. EEA #16654 would increase fossil fuel emissions. Despite claims of reduced ferry flights, there is no supporting data available to the public. Prior similar expansions failed to reduce ferry flights. Private jets are a particular concern, with an outsized carbon footprint for the very wealthy. Our children and grandchildren need a liveable future. We cannot accept profits for the few now that lead to a cascade of harmful effects for everyone else into the future.

Paving and construction for EEA #16654 creates more runoff and reduces soil-based carbon storage potential and wildlife habitat. Runoff from paved surfaces of an airfield likely carries pollution, increasing the burden for wastewater treatment and creating potential for untreated water to contaminate local waterways. Paving and construction on open spaces means loss of a critical nature-based climate solution: when there are no longer plants to

capture carbon from the atmosphere, they can no longer store a portion of that carbon in the soil. Building also causes habitat destruction, stressing wildlife and potentially leading to a loss of biodiversity that makes our ecosystems less resilient in the face of our changing climate. We as humans are interconnected members of our ecosystems; what hurts wildlife, ultimately hurts us.

A portion of the communities around Hanscom Airfield are environmental justice populations, as defined by the state's Executive Office of Energy and Environmental Affairs. These are communities already burdened by noise pollution and water quality concerns, including lead contamination in water. EEA #16654 would only increase burdens on these communities. We do not believe the planning process sufficiently included the voices and input of surrounding environmental justice communities.

We believe EEA #16654 represents an example of profits over people. We see Hanscom as a part of the Lincoln community. We urge you to do the same, and in light of the myriad negative community impacts posed by EEA #16654, consider the broader and longer-lasting benefits of leaving space undeveloped. We are particularly concerned about development that enables further fossil fuel emissions, as in this case. We urge you to rethink EEA #16654 and bring in broader community engagement, including from environmental justice communities.

**From:** [James Carlson](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654 LG Hanscom Field North Airfield Development  
**Date:** Wednesday, February 15, 2023 6:30:17 AM

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Hello,

As a neighbor of the Hanscom airport, I'm reaching out to express my concern about the massive expansion plan in the works with Massport. I moved to Bedford because of the idyllic community and knowing there was an active airport nearby. On weekends we hear the little putter flights fly overhead and my young children enjoy shouting at the airplane. During the weekdays we hear the corporate jets takeoff. I am not anti-airport, however I am against this development. There has been no commitment to investing alternatives to the leaded avgas that is used at Hanscom, so rightfully, I don't want more of it around. The [exposure to lead, especially in children, can cause significant health issues](#). Knocking down acres and acres of trees to pave space for more airplane hangars to house private jets with massive per-seat-mile carbon emissions goes against the movement toward a sustainable future that the Commonwealth of Massachusetts has proposed. Additionally when there's construction at Hanscom, there is increased construction traffic that jake-brakes in front of my house on rt 62, this is unnecessary noise pollution and significantly decreases our quality of life. Given the future daily fuel deliveries by tanker vehicles carrying leaded fuel, it is a significant ongoing concern.

Please consider the voice of the residents and families who live in the Hanscom vicinity. Let's protect the health of our children who live in the neighborhood.

Thank you for your consideration,  
James Carlson  
197 Concord Rd. Bedford, MA

**From:** [Jessica Cooper](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Wednesday, February 15, 2023 9:26:39 AM

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My public comment comes late, because I am only hearing about this now. Hopefully it will be counted.

As someone who has only recently moved to Lincoln, but who has admired the beauty of this area for more than two decades- I strongly object to any expansion that will have an adverse affect on both the environmental health, human community and conservation. Lincoln has been a staunch conservationist town for decades, and this is the reason we can still enjoy old tree woods, healthy fungal networks, foxes, raccoons, coyote, opossums and beautiful birds. Lincoln is still beautiful and healthy because of the opposition to expansion and this expansion is no exception.

I strongly object as do the majority of neighbors in my immediate area. NO to expansion!!!

respectfully,

--

Jessica Cooper | Voice Teacher  
Pronouns: she/her/hers [what's this?](#)  
current project: [Henry Purcell Society of Boston](#)  
personal website: [Jessica Cooper: soprano](#)  
[617.840.3921](#); Cell



# MASSACHUSETTS WATER RESOURCES AUTHORITY

Charlestown Navy Yard  
100 First Avenue, Building 39  
Boston, MA 02129

Frederick A. Laskey  
Executive Director

Telephone: (617) 242-6000  
Fax: (617) 788-4899  
TTY: (617) 788-4971

February 15, 2023

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge St, Suite 900  
Attn: MEPA Office, Alex Strysky  
Boston, MA 02114

Subject: EOEEA #16654 – Environmental Notification Form  
L.G. Hanscom Field North Airfield Development, Bedford, MA

Dear Secretary Tepper,

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted by Runway Realty Ventures, LLC and North Airfield Ventures, LLC (together the “Proponent”) for L.G. Hanscom Field North Airfield Development (the “Project”) in Bedford, Massachusetts. The Project site encompasses two parcels totally approximately 47 acres. The Project involves development 27 purpose-built hangers for aircraft parking and storage on-airport.

## Wastewater

The ENF reports that the Project will generate approximately 12,150 gallons per day of new wastewater flow. The Town of Bedford sewer system ties into the Town of Lexington sewer system that conveys flows to MWRA’s Millbrook Valley Relief Sewer, which in turn transports the flows to MWRA’s North Metropolitan Sewer, Chelsea Creek Headworks, and ultimately the Deer Island Wastewater Treatment Plant. Sections of the MWRA system can surcharge and overflow in large storms, due to high levels of infiltration and inflow that enter tributary community systems, as well as stormwater contributions from combined sewer communities. To ensure that the Project’s new wastewater flow does not increase surcharging or overflows in large storms, the Proponent should fully offset new flows to the sewer system with infiltration/inflow (I/I) removal from a hydraulically related sewer system(s) on the property or owned by the Town of Bedford.

## TRAC Permitting

MWRA prohibits the discharge of groundwater and stormwater into the sanitary sewer system, pursuant to 360 C.M.R. 10.023(1) except in a combined sewer area when permitted by the Authority and the local community. The Project site has access to separate sewer and storm drain systems. Therefore, the discharge of groundwater or stormwater to the sanitary sewer system associated with this Project is prohibited.

The Proponent currently holds a Sewer Use Discharge Permit and should continue to adhere to this permit. If the Project will change current operations and/or discharge(s) such as adding and/or increasing its daily wastewater discharge flow, the Proponent must provide at least 30 days advance written notification to Susan Viera, Industrial Coordinator, in the TRAC Department at (617) 305-5669 or [Susan.Viera@mwra.com](mailto:Susan.Viera@mwra.com). This notification is required prior to any action which may substantially change the volume or nature of discharge, including an addition and/or increase of daily discharge flow or character of pollutants in discharge, from any compliance measurement location or any sewer connection. The Proponent should also contact Susan Viera if a new MWRA Sewer Use Discharge Permit is required for the Project.

Any gas/oil separators in parking garages associated with the project must comply with 360 C.M.R. 10.016 and State Plumbing Code. The installation of the proposed gas/oil separators may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. For assistance in obtaining an inspection the Proponent should contact Michael J. Quercio, Source Coordinator, at (617) 305-5645 or [Michael.Quercio@mwra.com](mailto:Michael.Quercio@mwra.com).

On behalf of the MWRA, thank you for the opportunity to provide comments on this Project. Please do not hesitate to contact Katie Ronan of my staff at (857) 289-1742 with any questions or concerns.

Sincerely,



Rebecca Weidman

Director

Environmental and Regulatory Affairs

cc: John Viola, MassDEP

**From:** [Robin Breen Dobrusin](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Wednesday, February 15, 2023 1:28:26 PM

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Hello,

I am a resident of Lincoln, MA, and I am concerned about the proposed expansion of Hanscom. This proposed development is unacceptable on many levels. I'm particularly concerned about the following impacts:

- Increased aircraft operations and ground travel
- Noise, air, water, and soil pollution
- Public health
- Environmental Justice populations
- Climate change
- Wildlife
- Mature tree removal

I agree with the Mother's Out Front Lincoln Public Comment, pasted below:

Mothers Out Front Lincoln Public Comment in Response to EEA #16654  
February 3, 2023

Mothers Out Front Lincoln opposes the proposed development and expansion of Hanscom Field North Airfield. Our Lincoln team is an ambitious group of mothers, grandmothers, and caregivers ready to take on the many important environmental challenges we face, both locally and globally. We are excited to be joining a powerful grassroots movement to ensure a swift, complete, and just transition away from fossil fuels. We believe EEA #16654 would negatively impact our community and contribute to climate change and environmental degradation at a time when we are trying to move toward net-zero. Further, we have concerns about the impacts of expansion on environmental justice communities.

Climate change is an emergency that requires urgent action to move away from fossil fuel emissions. EEA #16654 would increase fossil fuel emissions. Despite claims of reduced ferry flights, there is no supporting data available to the public. Prior similar expansions failed to reduce ferry flights. Private jets are a particular concern, with an outsized carbon footprint for the very wealthy. Our children and grandchildren need a liveable future. We cannot accept profits for the few now that lead to a cascade of harmful effects for everyone else into the future.

Paving and construction for EEA #16654 creates more runoff and reduces soil-based carbon storage potential and wildlife habitat. Runoff from paved surfaces of an airfield likely carries pollution, increasing the burden for wastewater treatment and creating potential for untreated water to contaminate local waterways. Paving and construction on open spaces means loss of a critical nature-based climate solution: when there are no longer plants to capture carbon from

the atmosphere, they can no longer store a portion of that carbon in the soil. Building also causes habitat destruction, stressing wildlife and potentially leading to a loss of biodiversity that makes our ecosystems less resilient in the face of our changing climate. We as humans are interconnected members of our ecosystems; what hurts wildlife, ultimately hurts us.

A portion of the communities around Hanscom Airfield are environmental justice populations, as defined by the state's Executive Office of Energy and Environmental Affairs. These are communities already burdened by noise pollution and water quality concerns, including lead contamination in water. EEA #16654 would only increase burdens on these communities. We do not believe the planning process sufficiently included the voices and input of surrounding environmental justice communities.

We believe EEA #16654 represents an example of profits over people. We see Hanscom as a part of the Lincoln community. We urge you to do the same, and in light of the myriad negative community impacts posed by EEA #16654, consider the broader and longer-lasting benefits of leaving space undeveloped. We are particularly concerned about development that enables further fossil fuel emissions, as in this case. We urge you to rethink EEA #16654 and bring in broader community engagement, including from environmental justice communities.

Robin Dobrusin  
Lincoln, MA



**From:** [Marlies Henderson](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [kati@saveourheritage.com](mailto:kati@saveourheritage.com); [Brian Henderson](#); [LeVangie, Duane \(DEP\)](#); [mdavis@burlington.org](mailto:mdavis@burlington.org)  
**Subject:** Hanscom North Airfield Development  
**Date:** Thursday, February 16, 2023 5:39:31 PM

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Hi Alexander,

Today, as a member on the SuAsCo W&S River Stewardship Council (representing Billerica), I received - with delay - an email which mentions a deadline for public comment on February 14, noting that the project might affect the Sudbury and Concord Rivers and Great Meadows Wildlife Refuge. However, the Shawsheen River is also near and dear to me.

Hanscom Airport was built on the meadows that were the headwaters of the **Shawsheen River**. I reviewed the hyperlinked documentation. The proposal lists "Shawsheen" once, under watershed, but doesn't mention the Shawsheen River - only its tributary Elm Brook. The plans show the Shawsheen River as an unnamed blue line: I attached a screenshot of their map, marking the Shawsheen River with a red arrow, but don't take my word for it: You can google Hanscom Airport and you will find that the Shawsheen River is substantially more significant than Elm Brook. I cc'd the President of the Shawsheen River Watershed Association.

If the project moves forward, it will almost double impervious surface, which (especially with climate change and increased extreme weather conditions) will supersize the flood wave north through Bedford, to Billerica, Wilmington, Tewksbury, Andover, to the Merrimack at the City of Lawrence. **Flooding** is an issue already! The applicant should at least be mandated to mitigate for the flood wave by building a more efficient bridge for Rte 3A, which already floods.

Secondly, the proposal denies affecting water supplies, but: The Town of Burlington relies heavily on the Shawsheen River for its **drinking water supply**: Except under extreme drought conditions, contrary to the recent past, Burlington almost daily pumps up to 8 MGD river water five miles from Billerica to the Burlington Mill Pond water reservoir. It used to be a strictly auxiliary emergency source! I cc'd Duane Levangie to alert him as your colleague with DEP, as well as Matt Davis, Water & Sewer Superintendent for Burlington, MA.

Thank you for your time and attention to this matter. I hope you will find a way to include this email in the MEPA Public Comments.

Marlies

--

Marlies Henderson, CIG  
[marliesoutdoors.com](http://marliesoutdoors.com)

*"People protect what they love" (Jacques Yves Cousteau)*



**From:** [MEPA \(EEA\)](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Fw: No Hanscom Expansion  
**Date:** Friday, February 17, 2023 2:01:20 PM

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**From:** Jill Baker <jillbbaker7@gmail.com>  
**Sent:** Friday, February 17, 2023 12:36 PM  
**To:** MEPA (EEA) <mepa@mass.gov>  
**Subject:** No Hanscom Expansion

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Dear MEPA Representative,

I am writing to voice my objection to the expansion of Hanscom Airport. It is a poor choice to allow more private jets, as well as large airliners to use Hanscom as these historic areas devote tax dollars to creating and sustaining greener living.

Thank you very much for your attention to this matter.

Sincerely,

Jill Baker  
7 Nichols Rd, Lexington, MA 02420

**From:** [MEPA \(EEA\)](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Fw: Hanscom's field expansion  
**Date:** Friday, February 17, 2023 2:59:29 PM

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**From:** Anne Lehmann <annelehmann@comcast.net>  
**Sent:** Tuesday, February 14, 2023 7:07 AM  
**To:** MEPA (EEA) <mepa@mass.gov>  
**Subject:** Hanscom's field expansion

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Hello,

Please know that as a resident of Concord I am not in favor of the expansion of Hanscom's airfield. I think it would provide problems for the neighboring town such as Concord, the noise for residences near by, the air space pollution, effecting the environment and I would prefer that you not expand.

Thank you.

Anne Lehmann

**From:** [Linda Shalon](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Subject:** Please do not enlarge the airport  
**Date:** Sunday, February 19, 2023 8:29:15 AM

---

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Hi I live in Lexington,  
It will be an environmental disaster.  
I will move out of the area.  
It will certainly devalue the surrounding neighborhood properties.  
It's naive not to understand people pay high property taxes to get away from airports, not closer.  
Thank you,  
Linda Shalon  
289 Marrett Rd.  
Lexington, MA 0242-

Sent from my iPhone



COMMONWEALTH OF MASSACHUSETTS  
**THE GENERAL COURT**  
STATE HOUSE, BOSTON 02133-1053

February 20, 2023

Rebecca Tepper, Secretary  
Executive Office of Energy and Environmental Affairs (EEA)  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Lisa Wieland, Chief Executive Officer  
Massachusetts Port Authority  
One Harborside Drive, Suite 2005  
East Boston, MA 02128

Dear Secretary Tepper and CEO Wieland,

We write you concerning the proposed North Airfield Development at Hanscom Field. Together, we're legislators representing the area, leaders of community groups, and citizens concerned about global warming.

Massport and the developers involved in this project are confronting Massachusetts with a deeply disturbing prospect: 27 new hangars for private jets, tripling capacity at Hanscom for these aircraft.

For the privileged few, travel by private jet can be a super convenient part of work and family life. Because of the climate impact, it's also the single most irresponsible thing a person can do. Researchers refer to repeat users of private jets as super emitters.<sup>1</sup> Air travel of any kind is the most polluting form of transport. Super emitters do so much harm because private jet travel, per capita, is by far the most polluting form of air travel.<sup>2</sup>

The typical private jet flight carries on average only 4.3 passengers.<sup>3</sup> The super emitters who take such flights generate up to 7,500 tons of CO<sub>2</sub>e per person per year. This is 426 times the emissions generated per year by the average American.<sup>4</sup>

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<sup>1</sup> 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>.

<sup>2</sup> Gossling and Humpe at 9.

<sup>3</sup> 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/>.

<sup>4</sup> 7,500.00 tCO<sub>2</sub>e emissions by the average super emitter is from Gossling and Humpe at 9; 17.58 tCO<sub>2</sub>e emissions by the average American is at [https://www.climatewatchdata.org/countries/USA?end\\_year=2019&start\\_year=1990](https://www.climatewatchdata.org/countries/USA?end_year=2019&start_year=1990).

The companies that cater to super emitters are even more objectionable because their actions are so intentional. The journal *E&E News* reports, “In the securities filings of Textron Inc., Bombardier Inc., General Dynamics Corp., Dassault Aviation SA and Embraer SA — whose aircraft together make up over 90% of the world’s private jet fleet — climate change is mainly described as a regulatory challenge or not mentioned at all. Meanwhile, the industry’s lobby groups have fought against United States and European Union climate efforts and touted climate pledges that fall far short of the 2050 net-zero emission goal set by the Paris Agreement.”<sup>5</sup>

The new development at Hanscom is intended for the exclusive use of super emitters. In light of the climate challenges we face, this is profoundly disturbing. If and when these 27 hangars fill up with private jets, any gestures the developers make to green their buildings -- their ground facilities -- will be almost meaningless, the equivalent of paying a slap-on-the-wrist fine for the right to keep polluting.

**The same math confronts Massport and its high-profile plan to go net zero by 2031.<sup>6</sup> If the North Airfield project goes forward as the developers envision, we fear Massport’s sustainability efforts elsewhere will net out to very little in the way of reduced emissions, and possibly to nothing at all. Pollution attributable to traffic at the new Hanscom hangars threatens to cancel out all the gains.**

We know people at Massport want to do right by the climate. Which is all the more reason to view the use of government infrastructure to cater to super emitters as an act of environmental defilement no longer compatible with the stated climate priorities of the Commonwealth of Massachusetts in general and Massport in particular.

We urge both the Executive Office of Energy and Environmental Affairs (EEA) and Massport to use their respective roles to convert this distressing Hanscom project into an exercise in national climate leadership. Massport greening its buildings is pretty conventional stuff. Greening its private jet clientele is not. It’s the stuff of leadership.

***Specifically, with respect to the North Airfield development, we ask EEA and Massport to exercise all their legal authority -- from MEPA scoping to development agreement to ground lease -- and all their considerable influence over lessees and business partners to ensure that the project is a national model of fossil fuel-free aviation. The only way this can happen is with a mandate that any and all hangars within the development house only fossil fuel-free aircraft. Given the consequences of hosting fossil fueled planes at the new facility, anything else will amount to little more than marketing speak and green washing.***

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<sup>5</sup> Corbin Hiar, “Climate ‘stigma’ smudges gleaming image of private jets,” *ClimateWire*, *E&E News*, Aug. 20, 2021, at <https://www.eenews.net/articles/climate-stigma-smudges-gleaming-image-of-private-jets/>.

<sup>6</sup> “Massport Announces Goal to be Net Zero by 2031,” Massport press release, March 17, 2022, at <https://www.massport.com/massport/media/newsroom/massport-announces-goal-to-be-net-zero-by-2031/>

We want to see state government employ its power over the North Airfield to seize first-mover advantage for Massachusetts in a transformation that's coming for everyone.

The Hanscom Field Advisory Commission (HFAC) is the body created in state law to give Massport input from the community regarding the airfield. In a formal public comment on the North Airfield development submitted to the MEPA office at EEA on Feb. 9, 2023, HFAC proposed what we're urging here. "There is a climate emergency, and every effort must be made to phase out and not expand fossil fuels," wrote Christopher Eliot, Lincoln resident and HFAC Chair. Specifically, "HFAC requests detailed plans for the use of sustainable airplane fuel or alternative fuels such as hydrogen or electric power by all aircraft supported by this project."

**As of the date of this letter, which is also the date it's being delivered, EEA's MEPA Office has not formally determined the "scope" of the Environmental impact Report to be done in connection with the project.<sup>7</sup> Nor has Massport staff executed either a development agreement or a ground lease with the developers. There is time to situate this project at the forefront of fossil fuel-free aviation.**

To cite one fossil fuel-free alternative we favor, an electric plane developed and successfully tested this past September by Eviation carries up to 9 passengers for up to 250 miles. Cape Air, a Massachusetts-based commercial operator of regional jet service throughout the Northeastern United States, believes Eviation's plane can "easily cover 80% of our flight operations." Eviation states, "Cape Air and Global Crossing Airlines, both US-based regional airlines, have placed orders for 75 and 50 Alice aircraft respectively."<sup>8</sup>

Working with the developers to reimagine the future of private jet travel at Hanscom, EEA and Massport can help usher in the next wave of innovation in aviation. In so doing, they and we can serve the interests of all the communities near Massport's various airfields. **We don't propose to move private jet traffic elsewhere. We know it will continue to be located at Hanscom. But we urge you, in the strongest possible terms, to ensure that Massachusetts does not enable super emitters. Make travel by private jet innovative. Make it climate compatible. Make it fossil fuel-free.**

We request a meeting to discuss this further. Please let us hear from you.

Sincerely,

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<sup>7</sup> MEPA regulations provide, at 301 CMR 11.06, "(2) Consultation and Investigation. After receiving and accepting an ENF, the Secretary shall review the ENF *and may review relevant information from any other source* to determine whether to require an EIR, *and, if so, what to require in the Scope.*" (Emphasis added.)

<sup>8</sup> Eviation press release, "Eviation's Alice Achieves Milestone with First Flight of All-Electric Aircraft," at <https://www.eviation.com/wp-content/uploads/2022/09/Eviation-First-Flight-Press-Release-9.27.22.docx-1.pdf>.



Mike Barrett  
*State Senator*  
Lexington

Cindy Friedman  
*State Senator*  
Lexington-Arlington

Simon Cataldo  
*State Representative*  
Concord

Christopher Eliot  
*Chair, Hanscom Field  
Advisory Commission*  
Lincoln

Neil Rasmussen  
*President, Save Our  
Heritage*  
Concord

Jay Kaufman  
*Former State  
Representative*  
Lexington

Judith Aronstein  
*Mothers Out Front, Acton  
Chapter*  
Acton

Corinne Doud  
*Chair, Environmental  
Justice Committee,  
First Parish Church of  
Bedford*  
Bedford

Carol Kelly  
*Mothers Out Front,  
Bedford Chapter  
Leadership Team*  
Bedford

Launa Zimmaro  
*Carlisle Environmental  
Sustainability Committee*  
Carlisle

Keith Bergman  
*Climate Reality Project,  
Boston Metro Chapter*  
Concord

James Boyle  
*Chair and Founder,  
Sustainability Roundtable*  
Concord

Mara Dolan  
*Democratic State  
Committeewoman,  
3rd Middlesex District*  
Concord

Ira Goldman  
*Concord Representative,  
Massport Community  
Advisory Committee*  
Concord

Brad Hubbard-Nelson  
*Treasurer and Co-  
Founder, MassEnergize*  
Concord

Gilbert Metcalf  
*Former Deputy Assistant  
Secretary for Energy and  
the Environment, U.S.  
Department of the  
Treasury*  
Concord

Shelley Peterson  
*Citizen Activist*  
Concord

Chris Schaffner  
*Founder and CEO, The  
Green Engineer*  
Concord

Richard Canale  
*Former Lexington Planning  
Board Member*  
Lexington

Cindy Arens  
*Chair, Sustainable  
Lexington Committee*  
Lexington

Margaret Coppe  
*Lexington Member,  
Hanscom Field Advisory  
Commission*  
Lexington

Marcia Gens  
*Vice Chair, Lexington  
Climate Action Network*  
Lexington

Barbara Katzenberg  
*Lexington Member,  
Hanscom Field Advisory  
Commission*  
Lexington

Jeanne Krieger  
*Co-Chair, Lexington  
Climate Action Network*  
Lexington

Joe Pato  
*Lexington Select Board*  
Lexington

Alice Pierce  
*Grandmothers for Our  
Future*  
Lexington

Mark Sandeen  
*Lexington Select Board*  
Lexington

Jennifer Glass  
*Lincoln Select Board*  
Lincoln

Roy Harvey  
*Lincoln Green Energy  
Committee*  
Lincoln

Edward Kern  
*Lincoln Green Energy  
Committee*  
Lincoln

Susan & Christopher Klem  
*Lincoln Green Energy  
Committee*  
Lincoln

Patricia O'Hagan  
*Mothers Out Front, Lincoln  
Chapter*  
Lincoln

James Stock  
*Professor of Economics,  
Harvard University*  
Lincoln

Gary Taylor  
*Lincoln Planning Board*  
Lincoln

**From:** [Metin Elyazar](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Tuesday, February 21, 2023 11:08:31 AM

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Mr. Alexander Strysky  
MEPA Office 14 February 2023  
100 Cambridge St., Suite 900  
Boston, MA 02114  
[Alexander.Strysky@mass.gov](mailto:Alexander.Strysky@mass.gov)

RE: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strysky,

I am a resident of Bedford, MA and a mother of 2 children. We live near the north airfield side of Hanscom Airport in a neighborhood of single family homes with many families with children. My husband Scott and I strongly oppose this massive expansion project that will have a severe negative impact on the health and quality of life of children and families as well as the environment. Premium air travel for a few corporate elite at the expense of the health of our children, families and our environment is unconscionable.

This airport expansion is a colossal step backwards in our efforts against climate change, an existential threat to our planet. This expansion negates all the efforts Massachusetts has made towards reducing our carbon footprint. There is a vast amount of data on the impact of air and noise pollution on our children and our environment. This expansion project, over a 50% expansion in square footage, will result in children being exposed to lead and other carcinogenic emissions. Of particular concern are children who live within 5 miles of the expansion, including the hundreds of children who play at the athletic fields located directly across the street from the proposed expansion project.

Massachusetts has been leading the way to reduce our carbon footprint. As we have seen change at such an accelerated pace, this is no longer climate change, it is climate catastrophe. To propose an expansion of this magnitude as we face an unprecedented existential crisis of climate catastrophe is profoundly irresponsible, disappointing and dangerous. This expansion is proposed in a densely populated area with families with young children in close proximity. If we allow this expansion, then we are failing our children and our planet.

By Massport's own admission previously, the goals of this project are to increase profitability of the airport and to provide private jet travelers a more luxurious and private travel experience. This expansion is a money grab catering to the corporate elite at the expense of children, families and the environment.

Reference is made to the letter HFAC submitted in opposition to this expansion project and all comments incorporated herein. Additionally, please find concerns below including but not limited to the following:

- Increased jet traffic, carbon, lead & other poisonous gas emissions, and noise, including jet engine startups, taxiing and maintenance

- The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase.
- Health and safety effects to our children and families, living close to the airport, in particular, for all kids playing on The Edge fields
- The overall impact of this airport on climate change is certain to be harmful to our planet
- There will be aircraft refueling (possibly with underground tanks) directly over an aquifer and yards away from Hartwell Road
- There will be 13,500 gallons/day of increased water drawn from the Town of Bedford and 12,100 of wastewater produced
- Over 34 acres of forest with mature trees will be cleared and paved over, creating an overheated microclimate
- Hanscom Field adjoins Great Meadows National Wildlife Preserve. Therefore, this project will endanger protected wildlife
- There will be increased road traffic (including trucks) both pre and post construction along with air contamination during construction
- There will be huge water runoff in storms (with some fuel contamination)
- There is almost \*nothing\* in the MEPA ENF proposal that represents any hard environmental requirements or commitments
- This is for the benefit of corporate executives and companies that can afford to buy and use private jets

Based upon the aforementioned concerns, I strongly oppose the North Airfield Development project.

Sincerely,  
Gina & Metin Elyazar  
24 Liberty Road  
Bedford, MA 01730

**From:** [Kati Winchell](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Cc:** [Kati Winchell](#)  
**Subject:** RE: EEA #16654, Hanscom N. Airfield dev.- please add me to distribution list  
**Date:** Tuesday, February 21, 2023 3:29:01 PM

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Re: L.G. Hanscom Field North Airfield Development Environmental Notification Form (January 2023)-  
EEA #16654

Dear Mr. Strysky,

Please add my email to the distribution list as an interested party for future notifications related to this project:  
[kati@saveourheritage.com](mailto:kati@saveourheritage.com)

If possible, please send me confirmation of receipt of this request.

Thank you for your time and assistance,

Kati Winchell  
Projects Director  
Save Our Heritage  
91 Main St., Suite 201  
Concord, MA 01742  
[kati@saveourheritage.com](mailto:kati@saveourheritage.com)

**From:** [Tabassum h](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** I am against adding 27 new hangers to Hanscom AFB  
**Date:** Tuesday, February 21, 2023 9:19:17 PM

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Dear Mr. Strysky,

I live nearby Hanscom airport and the air and noise pollution caused by increased air traffic will be detrimental for myself, my family, my neighbors, peace serene habitat and wildlife and birds.

Best,

Tabassum Huseni  
96 Elm Brook Lane  
Concord MA-01742

Sent from my iPhone



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF  
ENERGY AND ENVIRONMENTAL AFFAIRS  
**DEPARTMENT OF ENERGY RESOURCES**

100 CAMBRIDGE ST., SUITE 1020

BOSTON, MA 02114

Telephone: 617-626-7300

Facsimile: 617-727-0030

**Maura Healey**  
Governor

**Kim Driscoll**  
Lt. Governor

**Rebecca Tepper**  
Secretary

**Patrick Woodcock**  
Commissioner

22 February 2023

Rebecca Tepper, Secretary  
Executive Office of Energy & Environmental Affairs  
100 Cambridge Street  
Boston, Massachusetts 02114  
Attn: MEPA Unit

RE: L.G. Hanscom Field, North Airfield Development, Bedford, EEA #16654

Cc: Maggie McCarey, Director of Energy Efficiency, Department of Energy Resource  
Patrick Woodcock, Commissioner, Department of Energy Resources

Dear Secretary Tepper:

We've reviewed the Environmental Notification Form (ENF) for the proposed project. The project includes the construction of 27 new airplane hangers (495,000-sf total) and alteration (or change of use) of an existing 87,000-sf hanger.

### **Codes and Baseline**

Significant updates to the commercial stretch building energy code will go into effect on 1 July 2023 which will apply to this project. (Herein called the "July 2023 commercial stretch code".) The details of this code are available here:

<https://www.mass.gov/info-details/stretch-energy-code-development-2022#final-code-language-for-stretch-code-update-and-new-specialized-stretch-code->

The July 2023 commercial stretch code makes significant changes and improvements to many sections of the code, including:

- envelope performance and thermal bridge accounting

- ventilation energy recovery
- electrification
- ASHRAE Appendix G
- EV readiness
- other sections.

We recommend that the MEPA baseline for this project be set at a building which meets the requirements of July 2023 commercial stretch code. Accordingly,

- For the new hangers, the MEPA baseline is a building which has a Building Performance Factor of 0.51 using ASHRAE 90.1 2019 Appendix G and the other mandatory requirements of Section C401.2.1 of the July 2023 stretch commercial code.
- For the existing hanger, if this hanger is to be altered, the MEPA baseline is a building which conforms to C503.1. If this hanger is to undergo a change of use, the MEPA baseline is a building which conforms to C505.1.

### **Conditioned, Semi-heated, and Unconditioned Spaces**

The extent of conditioned, semi-heated, and unconditioned spaces within the hangers is a key element to characterizing the planned project. It's critical that the project provide an accurate estimate of planned space use in order to accurately assess emissions reduction strategies.

For the proposed new hangers, the submission should provide the following:

- Area extent of *conditioned space*. Conditioned space is any space which will contain cooling equipment having cooling capacity equal to or larger than 3.4 btu/sf-hr or heating equipment capacity equal to or larger than 12 btu/sf-hr.
- Area extent of *semiheated space*. Semiheated space is any space which will contain heating equipment having capacity equal to or larger than 3.4 btu/sf-hr.
- Area extent of *unconditioned space*. Unconditioned space is space which is not conditioned or semiheated.

For the existing hanger to be altered, the submission should provide a breakdown of any increases to the area extent of above.

### **Key emissions reduction strategies**

For this project we expect key mitigation measures to include:

- Where semiheated or conditioned space is proposed, building practices that result in low heating and cooling thermal energy demand intensity (heating and cooling "TEDI") by:



- Maintaining envelope integrity with framed, insulated walls with continuous insulation;
- Thermal-bridge free envelope;
- Minimizing glass curtain wall assemblies and excessive windows;
- Low air-infiltration, confirmed with in-building air-infiltration testing;
- Ventilation energy recovery;
- Management of solar heat gains;
- Wherever space heating is planned, of any size or capacity, efficient electrification of space heating with air source heat pumps;
- If service water is proposed, efficient electrification of water heating with air source heat pump water heating;
- Extensive rooftop solar-readiness;
- Electric vehicle charging equipment and electric vehicle ready parking spaces.

### **Envelope, Heat Recovery, and Solar Gains**

The combination of quality envelope, heat recovery, and management of solar gains can result in significant reduction in heating (and cooling) thermal energy demand intensity (TEDI, units of kBtu/sf-yr)<sup>1</sup>. In addition to reduced utility costs and emissions, the value of a targeted focus on heating and cooling TEDI results in:

- Simplified space heating electrification;
- Reduction, and possible elimination, of perimeter heating systems;
- Improved resiliency;
- Reduced peak demands;
- Improved occupant comfort;
- Reduced maintenance.

Specific TEDI reduction strategies are:

- High-performance window and walls;
- Thermally-broken windows and other components to eliminate thermal bridges;
- Low air-infiltration;

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<sup>1</sup> Although they have the same units, heating and cooling TEDI is not the same as heating and cooling EUI. TEDI represents energy requirement, or demand, not energy consumption. For guidance on how to extract TEDI information from building models see “Energy Modeling Guidelines”, City of Vancouver, Planning, Urban Design and Sustainability Department, Land Use Development and Policy Guidelines, Version 2.0, amended 18 July 2018 and “Designing to TEDI, TEUI, and GHGI Performance Metrics”, International Building Performance Simulation Association (IBPSA), by Chan *et al*

- Ventilation energy recovery;
- Solar gain management via external shading and/or low solar heat gain coefficient (SHGC)

Buildings with curtain wall envelope require high performing windows and high performing opaque spandrels to achieve heating TEDI reductions. High performing windows and high performing opaque spandrels should be carefully evaluated if curtain-wall construction is considered.

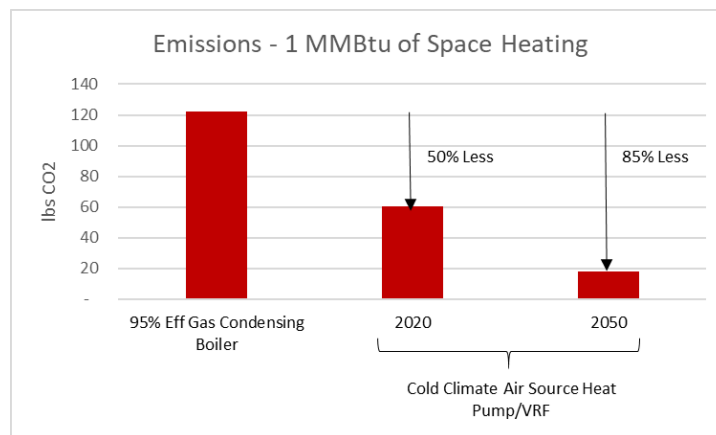
Note that the July 2023 commercial stretch code mandates at least 70% ventilation energy recovery.

### Efficient Electrification – Space Heating

Efficient electrification of space heating entails the swapping of fossil fuels (natural gas, oil, and propane), or electric resistance systems, with cold-climate rated air source heat pumps or ground source heat pumps.

Electrification of space heating is a key mitigation strategy with significant short- and long-term implications on GHG emissions. Massachusetts grid emissions rates continue to decline with the implementation of clean energy policies that increase renewable electricity sources. The implication is that efficient electric space heating with cold climate air source heat pump (or ground source heat pump) has lower emissions than other fossil-fuel based heating options, including best-in-class (95% efficient) condensing natural gas equipment.

Currently, efficient electric heating has approximately **50% lower emissions** in Massachusetts than condensing natural gas heating. By 2050, and possibly sooner, efficient electric heating is expected to have approximately **85% lower emissions** in Massachusetts than condensing natural gas heating. See illustration below.



### Efficient Electrification – Service Water Heating

Similar to above, due to Massachusetts low electric grid emissions, swapping from even “best in class” condensing gas equipment to electric air source heat pump service water heating results in

significant emissions reduction. Service water can be readily fully-electrified with air source heat pump water heating.

### **Solar PV**

Rooftop PV can provide significant GHG benefits as well as significant financial benefits. Even if PV is not installed during building construction, it is important to plan the project to ensure that roof space is set aside for PV and that roof space doesn't become unnecessarily encroached with HVAC appurtenances, diminishing the opportunities for future PV.

Note that code section C402.3 mandates PV readiness for buildings of less than 4 stories above grade.

Hanger buildings offer significant opportunities for solar PV either now or in the future. We recommend that at least 80% of the rooftop be made solar ready.

### **Electric Vehicle (EV) Parking Spaces**

EV charging stations are critical for the continual transition towards electric mobility. Both EV charging stations and spaces that are EV ready are recommended. Note that Section C405.13 of the code requires that 10% of spaces be EV ready for hanger buildings, at a minimum. We recommend increasing that minimum to at least 20-25% and having EV equipment installed for at least 10-15% of the spaces.

### **Incentives**

Buildings which incorporate the above strategies can qualify for significant incentives:

- MassSave<sup>®</sup> performance-based incentives<sup>2</sup> offer incentives for every kWh or therm saved compared to a program-provided energy model. The above energy efficiency strategies offer opportunities for large kWh and therm savings.
- Alternative Energy Credits (AECs)<sup>3</sup> offer incentives to electrify building space heating using heat pumps and/or VRF. This program also includes multipliers which increase value if the building meets Passivehouse standards or buildings built to HERs 50 or less. These credits may be distributed on a quarterly basis over time; or, may be distributed in a lump sum to the developer if certain conditions are met.
- Massachusetts SMART program<sup>4</sup> provides significant incentives for solar development on top of federal and state tax incentives. SMART includes pathways which allow solar production to be sold without off-takers. This may be of potential interest to building developers as this allows them to develop rooftop solar without necessarily engaging with

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<sup>2</sup> <https://www.masssave.com/en/saving/business-rebates/new-buildings-and-major-renovations/>

<sup>3</sup> <https://www.mass.gov/guides/aps-renewable-thermal-statement-of-qualification-application>

<sup>4</sup> <https://www.mass.gov/solar-massachusetts-renewable-target-smart>

building tenants. For this reason, setting aside rooftop solar PV areas helps ensure that building owners' ability to monetize the roof is not impacted.

### **Recommendations for the Next Submission**

Recommendations are as follows:

1. Provide a detailed breakdown of planned conditioned, semiheated, and unconditioned spaces for the proposed hangers and the hanger undergoing alteration.
2. Where there may be either semiheated or conditioned spaces, we recommend the following:
  - a. A combination of high-performing, thermally broken envelope, heat recovery, and solar gain management should be used throughout with an aim toward reducing heating TEDI.
  - b. Above code-threshold envelope (vertical walls, windows, roofs and exposed lower level floors). Priority should be given to increasing continuous insulation and framed insulated wall sections.
  - c. Account for thermal bridges in assemblies and components with calculating U values. Use thermal bridge free assemblies and components to thermally break:
    - i. Hangers, girts, ties, and brick shelves
    - ii. Intersections between balconies and vertical walls
    - iii. Intersections between the floor and vertical walls
    - iv. Transitions from wall to window
    - v. Parapets
  - d. Vertical wall to vertical wall transitions (where the wall "turns")
  - e. Consult <https://thermalenvelope.ca/catalogue/> for pre-solved clear wall thermal bridge and linear thermal bridge values.
  - f. Minimize glass curtain wall/spandrel systems as much as possible. Avoid these systems where possible, as these are the lowest performing wall systems.
  - g. If glazed wall systems (e.g curtain wall systems), which are common for office spaces, are used, evaluate systems having opaque "spandrel" portion between R-4 through R-10. Opaque spandrel systems with performance better than R-10 are not recommended as there are significant difficulties to achieve performance higher than this in practice. Consult <https://thermalenvelope.ca/catalogue/> for pre-solved opaque curtain wall performance values.

- h. If glazed wall systems are used, note that the 2023 commercial stretch code now mandates that the vision portion of the glazed wall system has at least R-4 vision glass.
    - i. For all wall sections adjacent to office spaces, use the thermal comfort tool to help evaluate reduction/elimination of perimeter heating systems. <https://www.payette.com/glazing-and-winter-comfort-tool/>
    - j. Reduce air infiltration to at least 0.3 cfm at 75 Pa. In-building field tests are recommended to confirm air-infiltration. This level of air infiltration and field testing are mandatory in the July 2023 commercial stretch code.
    - k. Incorporate ventilation energy recovery with an effectiveness of at least 70%. High performing energy recovery is essential to achieving low TEDI. This level of ventilation energy recovery effectiveness is mandatory in the July 2023 commercial stretch code.
    - l. Manage solar gains with external shading and/or low solar heat gain coefficient (SHGC).
  3. Space and water heating systems should be electric air source heat pump in all spaces for any systems of any size. Gas should be avoided.
  4. Where semi-heated or conditioned space is planned, develop the following improved scenario:
    - a. Improved envelope described above with inclusion of 70% effective energy recovery to achieve heating TEDI reduction;
    - b. Air infiltration of 0.3 cfm/sf at 75 Pa;
    - c. Downsize the HVAC as much as possible;
    - d. Elimination of use of gas or other fossil fuels.
    - e. Utilize heat pump systems equipped with energy recovery of concurrent heating and cooling.
    - f. External shading and/or improved solar heat gain coefficient windows to control space cooling loads;
    - g. Air source heat pump water heating.
  5. Compare scenario from 4 above to MEPA baseline strictly meeting ASHRAE 2019 Appendix G plus mandatory provisions. Compare other proposed scenarios to this same baseline.
  6. Evaluate incentives, including:

- a. Estimate of Alternative Energy Credits;
  - b. Estimates of MassSave® incentives, based on meeting with utility.
7. Evaluate 80% rooftop solar PV readiness. Evaluation should include creating building roof plans showing location of PV readiness areas and location of roof HVAC equipment and other appurtenances. Provide table showing areas needed for code required PV readiness and proposed, above-code PV readiness.
  8. Make at least 20-25% of the space EV ready. Install EV equipment on at least 10-15% of the spaces.
  9. Include a table similar to the example below where the base code corresponds to building meeting ASHRAE 2019 Appendix G plus mandatory provisions.

Measure/Area	Base Code	Proposed	% Change	Comment
AC Efficiency (EER)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
ERV Effectiveness (%)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
Boiler (% efficiency)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
LPD (Watts/sq ft)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
(continue to include service water, equipment, etc)				

Sincerely,



Paul F. Ormond, P.E.  
 Energy Efficiency Engineer  
 Massachusetts Department of Energy  
 Resources

**From:** [Vincent Da Forno](#)  
**To:** [Strysky, Alexander \(EEA\)](#)  
**Subject:** Hanscom airport expansion  
**Date:** Wednesday, February 22, 2023 2:46:43 PM

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CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr Strysky,

I am strongly opposed to the expansion of Hanscom airport due to the effects on the environment and noise pollution it will generate.

Thank you for your consideration on this matter.

Vincent Da Forno of Woburn, MA

Sent from my iPhone

**From:** [Christy Hart](#)  
**To:** [Strycky, Alexander \(EEA\)](#)  
**Cc:** [michelle.ciccolo@mahouse.gov](mailto:michelle.ciccolo@mahouse.gov)  
**Subject:** EEA #16654: L.G. Hanscom Field North Airfield Development ENF  
**Date:** Thursday, February 23, 2023 3:23:24 PM

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**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strycky and Ms. Ciccolo,

I am writing to express concern about the Hanscom Field airfield development proposal. I only learned about it today and though I understand that the public comment period has already passed, I wanted to share my apprehension about how this kind of a project would negatively affect our area. As a resident of Lexington, with a sister-in-law in Lincoln, neighboring Hanscom, it already feels there is a lot of air traffic as it is. The noise, pollution and greenhouse gas emissions that would inevitably come from expanding capacity at Hanscom would be detrimental to the health of the local community as well as to our environmental goals.

I hope you will work to prioritize the health of our community and environment over the corporate desire for additional space for private jets.

Thank you for your time and consideration.

Sincerely,  
Christen Hart  
91 Woburn St, Lexington, MA 02420