

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 Stryisky, MEPA Analyst for the Project
100 Cambridge Street, Suite 900
Boston MA 02114
VIA EMAIL: Alexander.stryisky@mass.gov

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

Dear Ms. Tepper and Mr. Stryisky:

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