



OLD NORTH BRIDGE

TOWN OF CONCORD

TOWN HOUSE - P.O. BOX 535
CONCORD, MASSACHUSETTS 01742

February 14, 2023

Mr. Alexander Strysky, 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. Strysky,

This letter is in response to the Environmental Notification Form received by the Town of Concord. After attending the site visit on Monday, February 6th 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