



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 Strycky, 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. Strycky,

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 250th 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 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