



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-netzero-by-2031/](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 <i>State Senator</i> Lexington	C Cindy Friedman <i>State Senator</i> Lexington-Arlington	Simon Cataldo <i>State Representative</i> Concord
Christopher Eliot <i>Chair, Hanscom Field Advisory Commission</i> Lincoln	Neil Rasmussen <i>President, Save Our Heritage</i> Concord	Jay Kaufman <i>Former State Representative</i> Lexington
J Judith Aronstein <i>Mothers Out Front, Acton Chapter</i> Acton	Corinne Doud <i>Chair, Environmental Justice Committee, First Parish Church of Bedford</i> Bedford	Carol Kelly <i>Mothers Out Front, Bedford Chapter Leadership Team</i> Bedford
Launa Zimmaro <i>Carlisle Environmental Sustainability Committee</i> Carlisle	Keith Bergman <i>Climate Reality Project, Boston Metro Chapter</i> Concord	James Boyle <i>Chair and Founder, Sustainability Roundtable</i> Concord
Mara Dolan <i>Democratic State Committeewoman, 3rd Middlesex District</i> Concord	Ira Goldman <i>Concord Representative, Massport Community Advisory Committee</i> Concord	Brad Hubbard-Nelson <i>Treasurer and Co-Founder, MassEnergize</i> Concord
G Gilbert Metcalf <i>Former Deputy Assistant Secretary for Energy and the Environment, U.S. Department of the Treasury</i> Concord	S Shelley Peterson <i>Citizen Activist</i> Concord	Chris Schaffner <i>Founder and CEO, The Green Engineer</i> Concord
R Richard Canale <i>Former Lexington Planning Board Member</i> Lexington	C Cindy Arens <i>Chair, Sustainable Lexington Committee</i> Lexington	M Margaret Coppe <i>Lexington Member, Hanscom Field Advisory Commission</i> Lexington
M Marcia Gens <i>Vice Chair, Lexington Climate Action Network</i> Lexington	B Barbara Katzenberg <i>Lexington Member, Hanscom Field Advisory Commission</i> Lexington	J Jeanne Krieger <i>Co-Chair, Lexington Climate Action Network</i> Lexington

Joe Pato <i>Lexington Select Board</i> Lexington	Alice Pierce <i>Grandmothers for Our Future</i> Lexington	Mark Sandeen <i>Lexington Select Board</i> Lexington
Jennifer Glass <i>Lincoln Select Board</i> Lincoln	Roy Harvey <i>Lincoln Green Energy Committee</i> Lincoln	Edward Kern <i>Lincoln Green Energy Committee</i> Lincoln
Susan & Christopher Klem <i>Lincoln Green Energy Committee</i> Lincoln	Patricia O'Hagan <i>Mothers Out Front, Lincoln Chapter</i> Lincoln	James Stock <i>Professor of Economics, Harvard University</i> Lincoln
Gary Taylor <i>Lincoln Planning Board</i> Lincoln		