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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.



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