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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.

Feb 20, 2026

Re: Comments on 2025 Massport Strategic Plan

Introduction

Save Our Heritage appreciates the opportunity to comment on Massport's Draft Strategic Plan, specifically for Hanscom Field. While we support thoughtful planning for the region's transportation infrastructure, we have significant concerns about the accuracy, completeness, and underlying assumptions of the Hanscom Field portion of this plan. Our comments address fundamental issues with how the plan characterizes airport operations, environmental impacts, economic benefits, and Massport's public mission.

1. Innovation Hub Emphasis Is Welcome

We support the plan's emphasis on Hanscom as an innovation hub. The recent placement of a company developing automated aviation technology is a constructive use of the facility that aligns with the region's R&D strengths. We encourage Massport to prioritize such uses, particularly companies working to reduce the environmental impacts of aviation.

2. Misleading Characterization of Private Jet Operations

The Strategic Plan repeatedly refers to jet operations as "business aviation" and aircraft as "business jets." This terminology is misleading and appears designed to create an impression of economic necessity that does not reflect reality.

The primary use of private jets at Hanscom is luxury travel to vacation and resort destinations by wealthy individuals. Flight tracking data consistently shows that top destinations include Nantucket, Martha's Vineyard, Florida resort communities, Caribbean islands, and ski destinations. These are not business trips; they are discretionary luxury travel by a small number of very affluent people who choose private aviation for convenience, comfort, and status.

The plan implies that private jet operations are essential to the surrounding innovation economy, describing Hanscom as "a linchpin for the surrounding R&D and innovation economy" that provides "critical services to its surrounding R&D neighbors." No evidence has ever been

offered by Massport or regional businesses to support these claims or to suggest that the innovation economy benefits from private jet flights. These assertions appear designed to borrow legitimacy from the region's genuine economic strengths without establishing any causal connection.

We request that Massport use accurate terminology throughout the Strategic Plan. These aircraft should be referred to as "private luxury jets" and operations should be described as "private aviation" rather than "business aviation." Honest characterization is essential for the public to understand what activities Massport is facilitating and at what cost to surrounding communities.

3. Misleading Environmental Claims

The Strategic Plan presents Hanscom as an environmental leader while ignoring the dominant source of its environmental impact: aircraft emissions.

The Plan Focuses Only on Ground Emissions

The sustainability initiatives highlighted in the plan address only ground-based sources: Net Zero ground support equipment conversion, electric vehicle charging infrastructure, solar energy generation, and building energy efficiency. While these are positive steps, they are marginal improvements that ignore the elephant in the room.

Aircraft emissions dwarf all ground-based emissions combined. By focusing exclusively on ground operations, Massport claims environmental leadership while facilitating explosive growth in the airport's actual carbon footprint.

The Plan Obscures Dramatic Jet Growth

The plan presents Hanscom's operations growth as modest (+5% over a decade), but this figure conceals a dramatic transformation in the type of operations. Propeller aircraft operations—which have relatively low environmental impact—are declining, while luxury jet operations are surging. Jet operations at Hanscom increased 66% from 2019 to 2023 alone. Jets now represent nearly half of all operations, up from approximately one-third.

This shift matters enormously because jets burn 10 to 20 times more fuel than propeller aircraft. Even with flat total operations, emissions are rising dramatically. The 5% growth figure is misleading; actual emissions growth is far higher due to the changing aircraft mix. Similarly, community noise impacts are worsening because jets are significantly louder than propeller aircraft.

The plan cherry-picks the one metric that looks benign while omitting the metrics that reveal the true impact. The plan's silence on this transition, and its emissions consequences, is a significant omission that undermines claims of environmental responsibility.

4. Vague and Unenforceable SAF Commitments

The Strategic Plan states that Massport will "promote sustainable fuel opportunities" and "support the development and adoption of sustainable aviation fuel." These statements are vague and misleading.

No concrete actions or accountability

The plan identifies no specific steps Massport will take. There are no targets, no timelines, no mandates, no defined incentive programs, and no metrics for measuring success. Without defined goals, actions, or accountability measures, words like 'encourage' and 'promote' express vague intentions regarding SAF and cannot be considered a credible plan. This approach fits a pattern that researchers have termed 'future soothing'—projecting technological salvation into a perpetually deferred future to ease public concern and postpone accountability. The aviation industry has employed this strategy since the mid-1990s, with promised solutions continually receding into the future.

No leverage and no SAF availability

Private jet operators can fuel wherever they choose, have no obligation to use SAF, face no penalties for using conventional fuel, and will rationally choose the cheapest option. Massport cannot "encourage" adoption of fuel that is not present, and the plan includes no commitment to make SAF available.

Available SAF offers limited environmental benefit

Not all SAF is equal. Feedstock-based SAF—the only type currently produced at any scale—offers modest lifecycle emissions reductions, perhaps 20-50% compared to conventional jet fuel. This is far from carbon neutral. The SAF with genuinely low emissions is e-fuel, produced using clean electricity to synthesize fuel from captured carbon and water. E-fuel production remains largely theoretical because it requires vast amounts of clean electricity that does not exist and will not exist at scale for the foreseeable future. Clean electricity that does become available will be needed for higher priorities: replacing fossil fuel power generation, electrifying transportation, and heating buildings. Diverting scarce clean electricity to produce jet fuel for luxury travel would be an extraordinarily poor use of a limited resource.

SAF production prospects are poor

The plan's reliance on SAF ignores fundamental constraints on production. SAF currently represents approximately 0.1% of global jet fuel supply. Today's SAF is produced from feedstocks like used cooking oil and agricultural residues. These inputs are finite resources already in demand for other uses, severely limiting scalability. SAF costs remain 2-4x higher than conventional jet fuel, with no clear path to price parity. The recent report commissioned by Massport confirms this.¹ Future low-emission SAF is based on e-fuel, which is theoretical and has no current prospects to be produced by 2050; even if it were produced, e-fuel just for Massachusetts aviation would require more clean electricity than the total generation (all sources) of the Commonwealth today, and is projected to cost 4X fossil jet fuel. The recent Massport-commissioned report on SAF dismisses this source for the foreseeable future.¹

5. The Plan Conflates Private Desire with Public Need

The Strategic Plan states that Massport will "continue to meet metro Boston's General Aviation needs." This framing deserves scrutiny: what exactly is this "need," and why is Massport obligated to satisfy it?

¹ *Massachusetts and New England Sustainable Aviation Fuel Study*, NLR, 2026, commissioned by Massport

The "need" being served is not a public need. It is a private desire for convenience, luxury, and status by a tiny fraction of the population—less than 0.1% of metro Boston residents—who impose a disproportionate climate burden on everyone else. The plan treats wealthy people's preferences as equivalent to genuine public transportation needs.

Moreover, the plan treats growth in private jet travel as an external force that Massport must accommodate. This inverts reality. Convenient regional airport infrastructure induces demand, just as adding highways induces more driving and building parking garages induces more car trips. Hanscom's availability and amenities encourage private jet travel that would not otherwise occur. Massport is not passively responding to demand; it is actively generating it.

Massport is a public authority chartered to serve the public good. Yet this plan prioritizes the convenience of the wealthy few, imposes environmental and health costs on surrounding communities, generates emissions that harm everyone, and uses public resources and authority to facilitate luxury consumption.

The Strategic Plan should answer a fundamental question: why should a public authority facilitate luxury travel that benefits a tiny elite while imposing noise, pollution, and climate costs on the broader public? This is not "meeting a need"; it is subsidizing the most carbon-intensive form of travel for the benefit of the few at the expense of the many.

Conclusion

The Hanscom Field Strategic Plan presents a vision of innovation and environmental leadership that does not withstand scrutiny. The plan mischaracterizes private luxury travel as "business aviation," ignores aircraft emissions while touting marginal ground-level improvements, offers only vague and unenforceable commitments on sustainable fuel, and treats the most carbon-intensive form of travel, used by a few wealthy individuals, as a public need.

We urge Massport to revise the Strategic Plan to provide honest characterization of airport operations and users, comprehensive environmental accounting that includes aircraft emissions, concrete and enforceable sustainability commitments, and a clear explanation of how facilitating luxury travel serves Massport's public mission.

The surrounding communities deserve a strategic plan that honestly addresses the impacts they bear and genuinely prioritizes the public interest over the convenience of the privileged few.

Sincerely



Neil Rasmussen

President, Save Our Heritage