

# HANSCOM FIELD ADVISORY COMMISSION

February 9, 2023

Alexander Strysky  
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Dear Mr. Strysky,

Thank you for providing an opportunity to comment on MEPA project 16654, "L.G. Hanscom Field North Airfield Development".

Hanscom Field Advisory Commission (HFAC) provides continued communication and education among the communities surrounding Hanscom Field and Massport and acts as an advisory commission for review and reaction to decisions relating to Hanscom Field, including land use, noise abatement, and transportation needs.

While HFAC has been aware for some time that a project would be proposed for the Hanscom North Airfield area, this filing is the first time we have been given any details about the proposed project. For many months there was the appearance that the sale and renovation of the old Navy Hangar was completely distinct from the North Airfield project; now it appears these projects are combined and have always been guided by a single developer. The scale of this project and short comment timeframe make it difficult for area communities and this commission to fully understand the proposal in the allowed comment period.

The reactions to this project known to HFAC have all been negative. The surrounding towns are all in the process of submitting letters in opposition to the project and many community groups are also opposed. The Minute Man National Historical Park and Great Meadows National Wildlife Preserve have both raised concerns. A number of members of the state legislature have expressed concerns or opposition to this project. HFAC is not aware of any local groups supporting this project.

There are many environmental concerns that need to be addressed.

1. The overall impact of this airport on climate change is certain to be harmful. The reduction in ferry flights does not appear to be a significant mitigation of this

impact. No data has been given to HFAC indicating how many ferry flights will be involved or the overall expected impact on climate change is expected from this project. HFAC requests data showing that the overall expected impact of this project will reduce climate change impacts, in alignment with regional goals to achieve net zero carbon emissions by 2050.

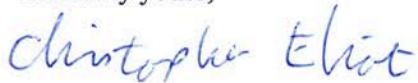
2. It is understood that the project includes a “fuel farm” despite being located over an aquifer. HFAC requests information proving that this fuel farm will not endanger the aquifer or local drinking water supplies.
3. There is a process under way to nationally phase out the use of leaded avgas. HFAC seeks assurance that none of the new hangar space will be used for aircraft operating on leaded avgas. HFAC seeks assurance that the new fuel farm will not include facilities to store or dispense leaded avgas (which is available from other FBOs at Hanscom Field).
4. The project will produce 495,000 additional square feet of hangar space at Hanscom Field, approximately a 50% increase. HFAC requests data showing that this will not produce a net increase in jet aviation traffic in the region, accounting for any possible reduction in ferry flights.
5. The project includes plans to upgrade taxiway and runway capabilities to accommodate larger Group 4 aircraft. HFAC requests data showing that this addresses an established need for the regional transportation system.
6. There is a climate change emergency and every effort must be made to phase out and not expand use of fossil fuels. HFAC requests an explanation of how this project contributes to the solution of this emergency.
7. Aviation contributes to the climate change emergency. HFAC requests detailed plans for the use of sustainable airplane fuel or alternate fuels such as hydrogen or electric power by all aircraft supported by this project. HFAC expects that this project will demonstrate a monotonic reduction in greenhouse gas emissions to reach a net-zero target by 2030.
8. Hanscom Field adjoins Great Meadows National Wildlife Preserve. HFAC requests that this project be studied to show that protected wildlife in the national preserve will not be harmed.
9. Many significant historical sites are in the immediate vicinity. Aviation using Hanscom Field is supposed to avoid creating disturbance over Hartwell Tavern in

the Minuteman National Historical Park. The “shot heard round the world” was fired at nearby Old North Bridge in Concord and the Lexington Battle Green is an important historical site and tourist attraction. HFAC requests information showing how these historical sites will not be harmed, including tourist revenue, educational opportunities and recreational enjoyment of the spaces.

10. The plan involves removal of approximately 34 acres of wooded area. HFAC requests information showing compensatory protection of an equivalent area elsewhere in the region.

The overall impact of the proposed North Airfield/Old Navy Hangar projects is likely to cause regional harm and contribute to environmental projects in many ways. This large airport expansion is incompatible with the densely populated region. It is not expected that these harms can be mitigated in any way. Therefore, the Hanscom Field Advisory commission joins with regional town governments and citizen groups to oppose this project.

Sincerely yours,



Christopher Eliot, Ph.D. HFAC, Chair

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