



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON, MA 02133-1054

Mr. Alex Strycky, MEPA Analyst
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Subject: EEA No. 16654 – L.G. Hanscom Field North Airfield Development, Bedford

July 24, 2025

Dear Mr. Strycky,

We, as members of the Massachusetts House of Representatives who represent the towns adjacent to Hanscom Field, those being Bedford, Concord, Lexington, and Lincoln, write to submit our comments on the Notice of Project Change (NPC) for the Navy Hangar Project at Hanscom Airport (Hanscom). In preparation for drafting this comment letter, we reviewed the 222-page NPC and its appendices that Runway Realty Ventures, LLC, and North Airfield Ventures, LLC, (the proponents) submitted to Secretary Rebecca Tepper in support of their proposal.

While we don't oppose the restoration and reuse of the historic Navy Hangar in principle, we urge the Secretary to consider this application in the context of the broader Hanscom development plans being pursued by this project's proponents. The partial waiver of the mandatory EIR review threshold being sought here would allow proponents to move forward with phase one of the project prior to preparing an EIR. To grant this waiver, the Secretary must consider whether (a) the potential environmental impacts of phase one, taken alone are insignificant; (b) ample and unconstrained infrastructure facilities exist to support phase one; (c) the project is severable, such that phase one does not require the implementation of any other future phase of the project or restrict the means by which potential environmental impacts from any other phase of the project or restrict the means by which potential environmental impacts from any other phase of the project may be avoided, minimized, or mitigated; and (d) the Agency Action on phase one will contain terms such as a condition or restriction in a Permit, contract, or other relevant document approving or allowing the Agency Action, or other evidence satisfactory to the Secretary, so as to ensure due compliance with MEPA and 301 CMR 11.00 prior to Commencement of any other phase of the project.¹ The filing does not provide adequate

¹ 301 CMR 11.11 (4).

explanation of several areas to be considered for this waiver as we explain herein. Therefore, we request that a revised NPC be filed to fully address the environmental significance of the Navy Hangar Project prior to a decision being made by the Secretary on granting the Phase One Waiver.

Site Work Necessity Unclear

Of particular note is the synergies of site work being undertaken in this project that would benefit the larger North Airfield Development project. This proposed work includes access and connectivity improvements, including modifying the existing curb cut and reconfiguring the existing site access drive from Hartwell Road, and expansion of the parking areas.

The NPC is not clear on the need for the new 140-space parking area for the proposed usage of the restored Navy Hangar, seeing as there already exists a 261-space lot. The filing even states that the parking lot will be constructed in an unobtrusive manner to Navy Hangar operations so that the proponents can “expedite the building space to market since access to the existing Navy Hangar can be maintained and reused while the proposed parking lot and new access to the ramp are constructed.” NPC 1.3.2. In saying this, the proponents so much as admit that this parking area is unnecessary to the needs of the restored Navy Hangar as facility use can begin prior to the parking area installation.²

In looking at the North Airfield proposal, one could assume that this new parking area and capacity would be used for future tenants of that project’s proposed new hangars. The Secretary has already raised concerns about the number of parking spaces as part of the North Airfield Project, writing the proponent “did not provide an explanation of the need for the proposed parking supply; this should be provided in the SDEIR.”³ This information is even more critical now as the Navy Hangar Project does not propose any alterations to the existing parking area and adds an additional 140 spaces, bringing the total parking area to 401 parking spaces, a far cry from the reduction in overall site parking in the proposed North Airfield Development. We would like to see justification for this proposed parking supply in a revised filing prior to any waivers being granted.

This proposal also includes a relocation and reconfiguring of site access from Hartwell Road. We request the changes being made, including lane width, driveway opening width, and any plans for signalization be explained as any site access changes are relevant to proposed future uses and the proponents could be using this opportunity to build capacity for that project. The proponents state in the NPC that “the Navy Hangar Project results in a minor increase in traffic, which will be partially mitigated by Transportation Demand Management (TDM) measures.” NPC 2.3. Although traffic may not be a central issue to the Navy Hangar Project

² See NPC Figure 1.4 Existing Site Conditions Plan.

³ See Secretary Rebecca Tepper EEA #16654 DEIR Certificate dated June 21, 2024, page 27.

(based on the figures used by the proponents), these access improvements should consider the expected traffic of the broader North Airfield proposal if the proponents expect this roadway to also accommodate the users of any new facilities constructed later. If these concerns cannot be addressed, site access or parking changes should not be considered for a Phase One Waiver.

Environmental Impacts Not Fully Accounted For

A requirement for a Phase One Waiver is that the Secretary must determine that “the potential environmental impacts of phase one, taken alone are insignificant.”⁴ The NPC affirms that the Navy Hangar Project “would not result in significant environmental effects.”⁵ However, the NPC lacks sufficient empirical evidence of this claim. Without sufficient information, the severity of this plan’s environmental effects cannot be assessed.

The NPC (like the flawed DEIR) “proposes minimizing land disturbance to the maximum extent practicable” and cites “Maintaining healthy existing trees will reduce temperatures of the Project Site by providing shade and will promote carbon sequestration.” NPC § 2.7.1. A comparison of the NPC’s Figure 1.4 (existing conditions) to Figure 1.5 (proposed site plan) demonstrates the extent of the canopy loss (nearly half) and the vast expansion of impervious parking services (including within the Zone II Wellhead Protected Area).

According to the NPC, the project will cause 1.8 acres of land alteration, including a total of 1.6 acres of wooded lands. NPC § 2.1.2. While we appreciate efforts made from the initial filing to this project to reduce the impact of land alteration, our concerns surrounding the lack of detailed accounting with measured caliper and carbon sequestration loss remain. Perhaps this is unsurprising as the proponent’s “Appendix E: Climate Change Supporting Documentation” states that a benefit of this project is not carbon sequestration, while also making the illogical claim that this project might improve air quality and prevent pollution.⁶ As was requested by the Secretary previously, it should be required for the proponents to “identify mitigation measures commensurate with the project’s impacts on the site’s capacity to sequester and store carbon.”⁷ The project, as described in the submitted NPC, lacks any information on proposed plantings and tree restoration.

Conclusion

The Navy Hangar Project, as presented in the NPC, appears to serve in part as a foundational phase of the larger, comprehensive North Airfield development, rather than a completely severed undertaking. Work that is not integral to the Navy Hangar restoration and reuse should not be considered for a Phase One Waiver. If this is the only time the MEPA Office

⁴ 301 CMR 11.11 (4).

⁵ See Michael Argios June 2, 2025 Letter to Secretary Tepper.

⁶ See NPC, Appendix E

⁷ See Secretary Rebecca Tepper EEA #16654 DEIR Certificate dated June 21, 2024, page 44.

and the public will be able to assess the environmental impact of this project, then every detail must be accounted for. We are not standing in opposition to the Navy Hangar Project—only to this proposal for a waiver based on an incomplete narrative. As such, we respectfully urge the Secretary to request a revised filing from the project proponents.

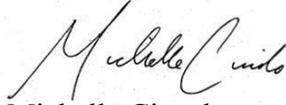
Sincerely,



Simon Cataldo

State Representative

14th Middlesex District



Michelle Ciccolo

State Representative

15th Middlesex District



Carmine L. Gentile

State Representative

13th Middlesex District



Kenneth I. Gordon

State Representative

21st Middlesex District



Alice H. Peisch

State Representative

14th Norfolk District