

Town of Bedford
Town Hall, 10 Mudge Way
Bedford MA 01730

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alexander Strysky, MEPA Analyst for the Project
100 Cambridge Street, Suite 900
Boston MA 02114
VIA EMAIL: Alexander.strysky@mass.gov

April 30, 2024

Re: Draft Environmental Impact Report (DEIR)
EEA No. 16654, L.G. Hanscom Field North Airfield Development

Dear Secretary Tepper and Mr. Strysky:

Thank you for the opportunity to submit public comments on the Draft Environmental Impact Report (DEIR) for the proposed North Airfield Development at L.G. Hanscom Field in Bedford, EEA No. 16654.

We appreciate the Proponent's request to extend the public comment period on this DEIR an additional two weeks, given the length of the DEIR and the significant impact of the proposed Project on the surrounding communities.

The DEIR seems comprehensive on its face, and we thank the Proponent for attempting to address many of the comments and concerns raised by EEA, the Town of Bedford, and other critical stakeholders in response to its Environmental Notification Form filed in January 2023. **Upon further review, however, the DEIR relies on repetition and surface-level inquiry more than deep analysis, which results in an incomplete, and in some cases misleading, assessment of the impact of the Project on the environment and surrounding communities.**

Our chief concerns with the DEIR relate to the Project capacity, the Proponent's methodology, and traffic.

I. CAPACITY

Central to the Proponent's justification for the Project is the notion of "ferry flights"—that they exist, that they are a problem, and that the Project is the solution. By providing additional hangars to house aircraft that currently use Hanscom as a stopover, the Proponent predicts the Project will result in approximately 3,500 fewer flights annually, or a 2–3% reduction in overall operations (page 1-3).

This assumption colors every assessment of the Project's impact. The Proponent simultaneously asserts, however, that the Project will result in 12 daily operations on average, representing 3–4% of total operations at Hanscom (page 2-2), thereby negating the promised reduction.

In Bedford we know that increased capacity does not necessarily result in decreased demand. The widening of Route 3, for example, rather than alleviating traffic or decreasing commuting times, has instead increased both, and sent more drivers off the highway and onto our local roads. The Proponent's claim that increased hangar capacity at Hanscom Field will decrease overall operations should be met with skepticism unless and until it is supported by considerable evidence—which the DEIR does not provide.

Indeed, the Proponent notes on page 1-3 that "Massport anticipates that business air travel will continue to use Hanscom whether the Project is constructed or not," and further states that it "intends the Project to meet existing demand." The Proponent's assessment of the proportion of Hanscom operations that are ferry flights is driven by its own criteria, which are applied to a limited set of data from Massport and FAA (Section 2-3). The Proponent has not, and under FAA rules cannot, confirm or document whether a recorded flight is a ferry flight, because identifying information on operators and the purpose of flights is not publicly available. Based on this limited data and the conclusions in Section 2.4, the Project's expected impact on ferry flights lies somewhere between "eliminate all" and "eliminate none."

We ask the Proponent to revise and republish its analyses of the Project's impact on overall operations and emissions without the assumed 2–3% reduction in ferry flights, since said reduction is not supported by sufficient evidence in the DEIR.

II. METHODOLOGY

General

The Proponent's assessment of the Project's impact on the local environment is based largely on the assumptions, projections, and models featured in the 2017 Environmental Status & Planning Report (ESPR). Data for this report was gathered in 2017—seven years ago—and shared with the public in May 2019.

The ESPR is prepared and published every five years, using data gathered two years prior to the publication date. The 2022 ESPR, therefore, is due from Massport in May 2024. Given the significant impact of the Project on airport operations and on the built and natural environments at Hanscom, it seems prudent that the DEIR and any further environmental assessments be based on the most current data available. The 2030 projections made in 2017–2019 may be very different from those made in 2022–2024, and it would behoove the Proponent to understand all the impacts of the Project in the current moment.

We ask that the Proponent review all its assessments and models against the 2022 ESPR once it is published, and that the EEA's review of this DEIR pause until that publication and review take place.

Air Quality

The Proponent's assertion that the Project will have negligible impact on overall emissions is based on its current design plans, which aim for LEED Gold certification. We appreciate the efforts the Proponent

is making to ensure its design incorporates as many sustainable and climate-friendly elements as possible, and we understand that ultimate responsibility for aircraft emissions rests with FAA, not with the Proponent. **To assert, however, that “no significant adverse air quality impacts would be expected to result from implementation of the Project” (page 8-12) is disingenuous at best.**

The Project is not an office building; it is not a biotech lab or a large apartment complex. It exists to house aircraft, and aircraft have disproportionate negative impacts on air quality. The specific aircraft that the Proponents are targeting—private and corporate jets—have a particularly egregious passenger-to-emission ratio. To fail to acknowledge the very nature of the Project in an attempt to minimize its holistic impacts on regional air quality is profoundly disappointing.

The four contiguous Hanscom towns and the Hanscom Field Advisory Commission have recently undertaken a study by Professor Neelakshi Hudda of Tufts University to determine the current baseline levels of ultrafine particles in the air around Hanscom Field. We anticipate this study will be complete within the next several weeks, and its findings should be helpful in understanding the existing conditions of ultrafine particles as well as airborne lead.

The EPA recently issued a finding that lead emissions from aircraft engines that operate on leaded fuel—which could include aircraft housed at the Proponent’s new hangars, since 55% of all operations at Hanscom Field come from aircraft using leaded avgas—cause or contribute to air pollution that may reasonably be anticipated to endanger public health and welfare. The Town of Bedford submitted a public comment in support of this finding, which is attached as an appendix to this public comment.

We ask MEPA to require a deeper analysis of the Project’s impacts on air quality, understanding the full context of the Project and not simply the building design, to determine whether the Project is truly capable of “advanc[ing] the Commonwealth’s climate agenda” (page 9-5).

Noise

The Proponent claims that the Project will have minimal impact on noise pollution in the area, based on its assumption that overall operations will be reduced, and that its building design and infrastructure will be attractive for aircraft using more sustainable, and therefore quieter, technology.

In our comment on the ENF, we noted that Bedford residents consistently log the highest number of monthly noise complaints to Massport, and urged the Proponent to minimize or absorb ground noise from planes in the new hangars. The Proponent’s response in Table 14.2, page 14-20, says only that “the Project’s predicted ground noise levels . . . will not exceed the FAA’s threshold for compatible land use.”

We note that FAA is currently reviewing its standards and metrics for measuring noise from aircraft and airports, in recognition that the longstanding Schulz curve, on which all noise metrics are currently based, is inadequate to capture actual levels of noise and annoyance from noise. Public standards and tolerance for noise have changed over time, and our understanding of the long-term dangers of noise pollution has increased. Planes may be quieter now than they were in the 1970s, but they are not less annoying to nearby residents.

The Town of Bedford submitted public comments to FAA in response to both its initial Neighborhood Environmental Survey and its more recent noise policy review, to encourage exploration of other noise

metrics to more accurately capture and assess environmental impacts of noise. Both letters are attached as an appendix to this public comment.

We ask the Proponent to revisit its assessment of the likely impact of noise pollution from the Project, incorporating real data gathered in person from existing Hanscom operations, rather than relying solely on AEDT, SoundPlan®, and other modeling methods.

III. TRAFFIC

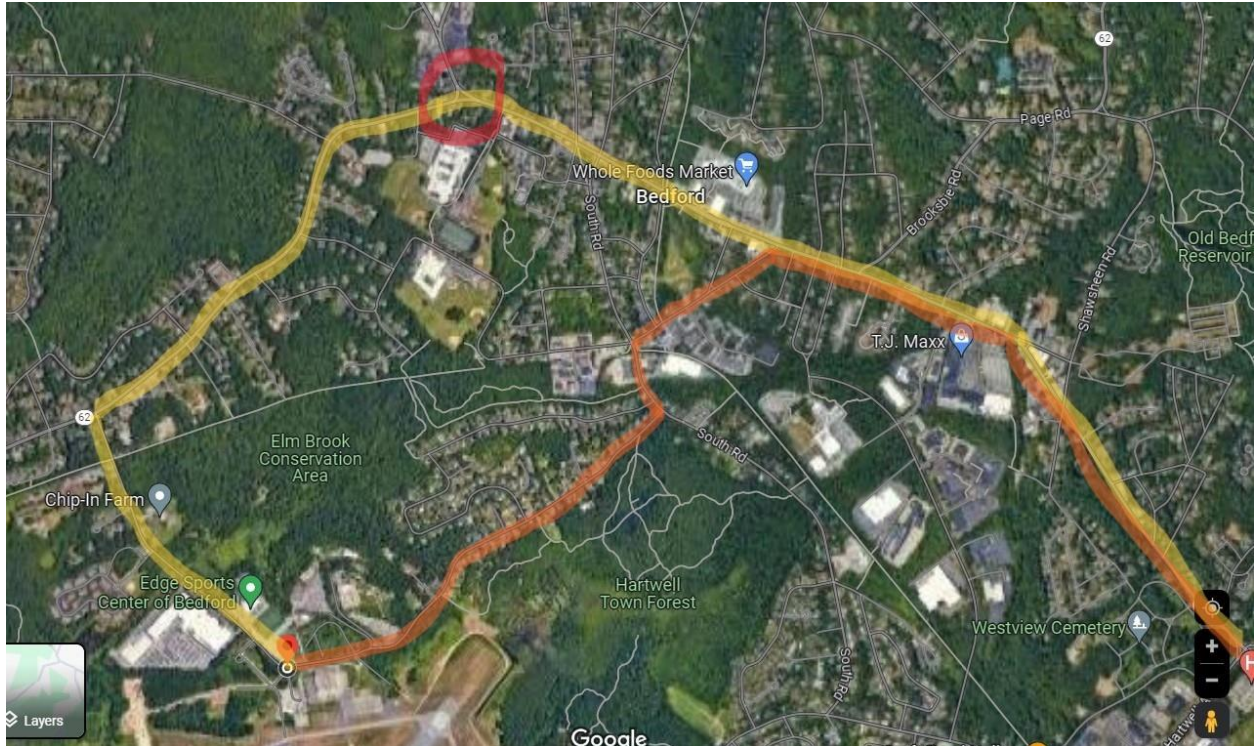
The Proponent’s assessment of the Project’s impacts on local roads is notably optimistic, and fails to account for local traffic patterns and infrastructure that may complicate the planned travel routes and expected daily trips.

The prospect of an internal service road off Route 2A/Hanscom Drive to take truck, construction, fuel, and other Project traffic off local Bedford roads, discussed on page 2 of our ENF comment, is dismissed by the Proponent in section 12.3.4.1 as “not feasible” after discussions with Massport (page 12-6), without delineating the reasons for this assessment. **We ask that the Proponent revisit this question with Massport**, given the clear advantages of Route 2A’s wider width and less residential surroundings in the stretch between 95/128 and Hanscom Field.

Instead, the Proponent asserts that all traffic to and from the Project will follow a prescribed route shown in Figure 4.2 and in yellow below, which takes vehicles, including heavy trucks during construction and tankers carrying fuel and other hazardous materials pre- and post-construction, all the way through the center of Bedford before making a sharp left-hand turn onto Hartwell Road to head back east toward one of the four Project curb cuts.

The Proponents claim this route will “minimize neighborhood impacts,” but the facts on the ground suggest the opposite. Great Road (4/225/62) is the main thoroughfare through Bedford and is regularly backed up with traffic during morning (eastbound) and evening (westbound) rush hours. The road splits at North Road and Concord Road, part of the proposed travel route. Concord Road is also a critical route for school buses serving three of Bedford’s four public schools at the start (~7:00am) and end (~3:00pm) of the Proponent’s proposed construction hours.

A more direct route off Route 95/128 that would avoid doubling back east, shown in orange below, would take trucks down Great Road, left on Loomis Street (a residential and commercial road), left on South Road at Depot Park, and then right on Hartwell through a long residential area. This option, while shorter, does not improve impacts to Bedford’s neighborhoods and also features sharp turns and narrow streets. Students from the nearby middle school on Railroad Ave also regularly use part of this route to reach Great Road on foot and bike.



The Proponent's description of the preferred route for fuel trucks is confusing, due to the reliance on state route numbers rather than local road names. On page 1-6 the Proponent states that the fuel storage facility will be accessed "from a designated route via Route 2 to Hartwell Road." We assume this is a typo, as there is no clear or direct way to reach Hartwell Road from Route 2.

Assuming that the Proponent means Route 62, as referenced elsewhere in the DEIR, and not Route 2, this is a state road that encompasses The Great Road in Bedford from the Lexington town line until the road splits at Concord and North Roads (circled in red above), with Route 62 continuing southwest toward Concord as Concord Road, and Routes 4/225 continuing northwest as North Road.

The Proponent's statement on page 6-2 that "Fuel delivery trucks are expected to arrive . . . from Route 62, traveling westbound on Hartwell Road," therefore, is not possible. Either the trucks are taking Route 62 all the way to Hartwell and then traveling east toward the Project site, or the trucks are leaving Route 62 at Loomis St and weaving their way through the Depot Park neighborhood to Hartwell Road traveling westbound. The Proponent should know the difference.

Similarly, in Table 13-1 on page 13-9, the Proponent aims "to establish a construction vehicle route to remain on Route 4/225 until turning onto Hartwell Road," which is also not possible.

Of less import but troubling nonetheless, the Proponent's suggestion that providing MBTA schedules to employees is a suitable Transportation Demand Management measure **demonstrates a lack of awareness of MBTA service in Bedford**. The closest MBTA stop to the Project is a bus shelter at the corner of South Road and Loomis Street, 1.4 miles from the Project site. In theory, a commuting employee could take the 62 bus to this stop and then bike (10 minutes) or walk (30 minutes) to the Project, but Hartwell Road is narrow and winding, with limited visibility in many sections and sidewalks that extend only to Bagley Avenue, half a mile from the Project site.

The Proponent also **misstates the number of curb cuts** in several places within the DEIR, acknowledging the use and reconstruction of two existing curb cuts, but failing to account for the two additional new curb cuts required for the proposed fuel storage facility east of the Navy Hanger. Every curb cut counts, even if the vehicles using it are limited.

IV. ADDITIONAL CONCERNS

Fuel Storage: We are concerned by the introduction of up to 85,000 gallons of Jet A and other fuels on the border of the Project site, adjacent to local roadways and a Superfund site (see below). Section 7.4.2 also indicates that captured petroleum waste products from stormwater discharge will be “stored in a hold tank and recovered for disposal at least once per year” (page 7-13). We ask the Proponent for more details regarding the proposed location of this hold tank and strategies to avoid spills and contamination if its contents lay stagnant for months at a time.

Superfund Proximity: We appreciate that the Proponent has been in contact with the Restoration Advisory Boards of the US Navy and Air Force regarding ongoing environmental cleanup of the Superfund site adjacent to the Navy Parcel. We remain concerned, however, that disturbances to the soil and groundwater at that site, as well as installation of underground storage tanks of jet fuel, could interfere with existing and future mitigation efforts.

Project Phasing: The Proponents claim that the Project will be constructed in five phases. These phases are poorly defined, however, and seem to overlap significantly, with all phases beginning in spring 2025, three ending in 2026, and two ending in 2027.

Misidentification:

- The Proponent references the “Bedford Historical Commission (BHC)” in Section 11.1.3 (page 11-3), which does not exist. Bedford has a Historic District Commission, whose area of oversight does not encompass the Project, and a Historic Preservation Commission, which is responsible for the preservation, protection, development, and management of Bedford's historical, archaeological, and cultural assets, as well as jurisdiction of the Town’s Demolition Delay by-law, which affects any structure built prior to 1943. We assume the Proponent means the HPC.
- Table 11-1 also references “300 Hartwell Road,” which is not a valid address; this should be 200 Hartwell Road, as it’s also part of the Chip-In Farm complex.
- Page 11-6 identifies the Instrumentation Laboratory building at 180 Hartwell Road (now Werfen), stating “it likely has associations with Hanscom Field and Hanscom AFB. Its original name and function has not been identified.” This building was part of the Naval Weapons Industrial Reserve Plant complex, built in 1959 and operated by the US Navy and Raytheon as the Systems Building for decades. Its provenance is common knowledge in the region, as the complex was a significant factor in Bedford’s post-war growth in the 1950s and 1960s. See <https://atlantic.navfac.navy.mil/LinkClick.aspx?fileticket=xOBz2vjwCVY%3D&portalid=71> (page 3, map page 5) and <https://www.bedfordma.gov/ArchiveCenter/ViewFile/Item/275> (pages 2–3).

V. CONCLUSIONS

We ask MEPA to require additional information from the Proponent before issuing any final determination regarding the environmental impact of the Project. In addition to the requests noted in the sections above, we also ask for:

- **More detailed evidence of the existence, number, type, and purpose of “ferry flights,”** ideally with examples of other general aviation airports in the US that have increased hangar capacity in a similar manner as the Project and seen a subsequent reduction in aircraft operations;
- **Updated analysis of all models and projections** for aircraft operations, climate change impacts, noise, and emissions based on the 2022 ESPR, expected from Massport in the coming months, and without the assumption of operational reductions due to ferry flights;
- **Further serious exploration with Massport of an internal service road** to serve the Project, which would keep construction vehicles, tankers, and other heavy equipment off local roads.

Thank you again for the opportunity to comment on this Project.

Sincerely,

The Select Board of Bedford

Shawn Hanegan, chair; Emily Mitchell, liaison to Hanscom Field Advisory Commission and Hanscom Area Towns Committee; Daniel Brosgol; and Bopha Malone

Office of the Bedford Town Manager
Bedford Department of Public Works
Bedford Planning Department
Bedford Fire Department
Bedford Code Enforcement Department
Bedford Health and Human Services Department
Bedford Housing & Economic Development Department

Cc: State Representative Kenneth Gordon
State Senator Michael Barrett
Christopher Eliot, Chair, Hanscom Field Advisory Commission
Mark Sandeen, Chair, Hanscom Area Towns Committee
Rick Muse, Runway Realty Ventures, LLC/North Airfield Ventures, LLC:
rick@charlesriverrealty.com
Michael Argiros, Runway Realty Ventures, LLC/North Airfield Ventures,
LLC: michael@charlesriverrealty.com
Ken Schwartz, VHB: kschwartz@vhb.com
Sharon Williams, Massport: swilliams@massport.com

Appendices attached:

1. DPW DEIR response including 1995 Hanscom wetlands maps, April 25, 2024
2. Town of Bedford comment on FAA NES, March 8, 2021
3. Town of Bedford comment on EPA proposed lead finding, January 10, 2023
4. Town of Bedford public comment on FAA noise policy review, June 12, 2023
5. Town of Bedford public comment on North Airfield ENF, February 13, 2023

TOWN OF BEDFORD

DEPARTMENT OF PUBLIC WORKS



314 THE GREAT ROAD
BEDFORD, MASSACHUSETTS 01730
TEL: 781-275-7605
FAX: 781-275-9010

Date: April 25, 2024

To: Matt Hanson, Town Manager

From: David Manugian, Public Works Director

Re: Preliminary Review of Draft EIR for North Airfield Development

APPENDIX 1:

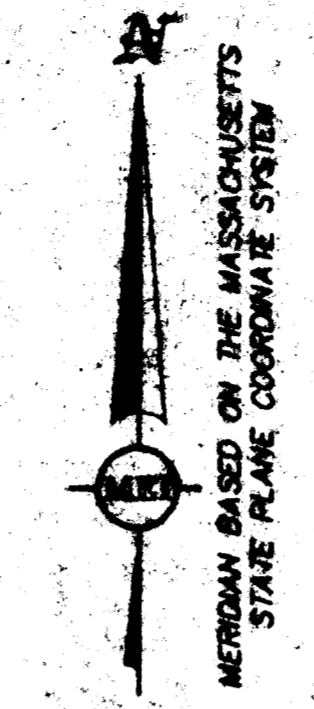
**DPW DEIR response including 1995
Hanscom wetlands maps, April 25, 2024**

DPW has completed a preliminary review of the DEIR for the North Airfield Development. The following list summarizes concerns or issues noted in the design that will require follow-up from the applicant:

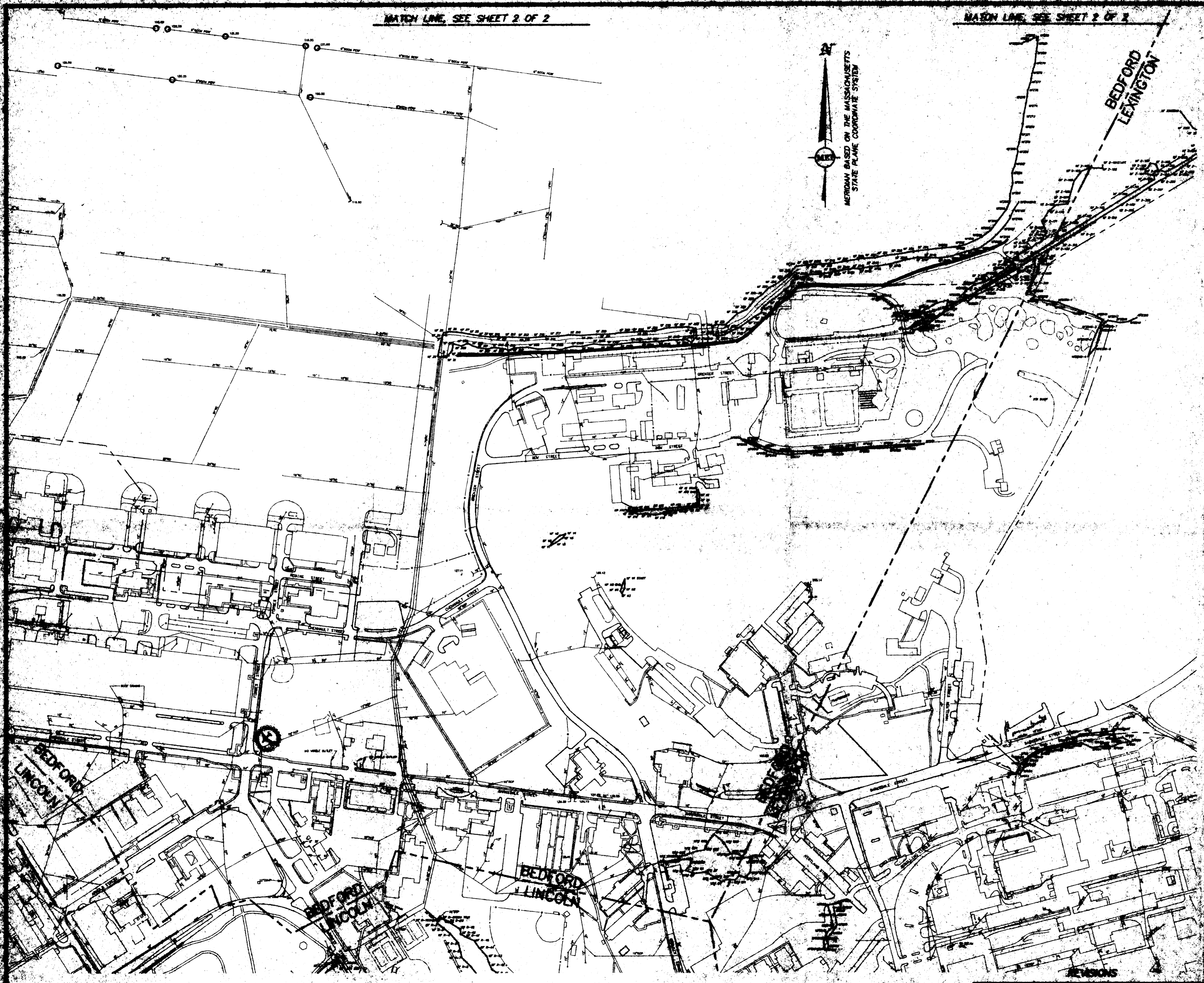
1. In Section 5, Land & Stormwater Management, the report narrative states that previously conducted subsurface investigations were used to identify a Rawls rate, and also that this rate will be verified in the field prior to finalizing the design. The original data and test pit results including groundwater elevation were not provided. Each individual infiltration system should have soil data collected and provided in the report.
2. The Town of Bedford GIS shows an existing wetland area north of the linear wetland shown on the plans. The attached plan shows this area and should be confirmed in the field by the applicant, as it is located within the footprint of the development.
3. There is documented groundwater contamination on the brownfield site located across the street on the north side of Hartwell Road. The applicant should investigate impacts and constraints that may have an effect on the continuing clean-up efforts on that site.
4. Hartwell Road has existing drain pipes that discharge to the project site, but are not shown on the utility plans. The location and inverts should be factored into the design.
5. An Existing Conditions site survey was not included, and is needed to facilitate the review of the project.
6. With regard to water and sewer to service the development, the ENF comment still applies: Additional capacity analysis for both water and sewer demand should be performed by the Town's consultants at the applicant's expense for the full buildout of both sites. Each parcel will need to have its own water and sewer connection and associated permits as well as being subject to the Inflow & Infiltration Sewer Bylaw.
7. With regard to the location of the underground fuel storage tanks, the applicant should provide further analysis on the safety of vehicles entering and exiting at the elevated curve in Hartwell Road with known speeding complaints.
8. The Utility Plans are difficult to review with regard to potential conflicts, etc. To aid further review, a color coded plan would be useful and also separate plans for different utilities (i.e. water/sewer on one sheet).
9. There are concerns with regard to the amount of fill required for the design and the impact to local roadways and traffic.
10. Tree removal for the project is significant, but there is no local jurisdiction and the Town is not involved in review or mitigation. However it encourage the applicant to revegetate the site where possible.

MATCH LINE, SEE SHEET 2 OF 2

MATCH LINE, SEE SHEET 2 OF 2



A1-2



LEGEND

- TOWN LINE
- - - PROPERTY BOUNDARY
- NETLAND BOUNDARY
- EXISTING STORM DRAIN

NOTES

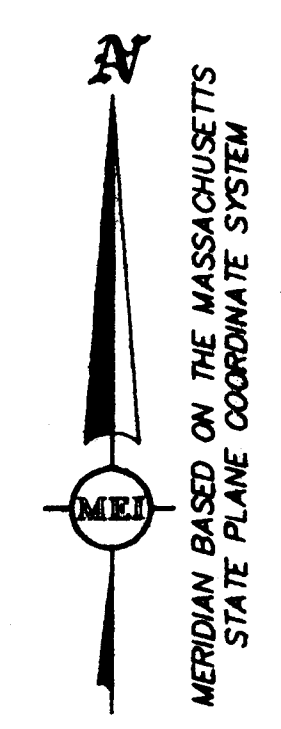
1. BORDERS VESTED IN NETLANDS ACQUIRED BY LED IN THE FALL OF 1984 AND LOCATED BY MERRILL ENGINEERING, INC. IN THE FALL OF 1988.
2. THE SCALE PORTION OF THIS PLAN IS TO DEFINE THE LOCATION OF EXISTING STRUCTURES IN PLACE. THE LOCATION OF ALL OTHER FEATURES SHOWN AS PROPOSED OR PLANNED LINES, BUILDINGS, ROADS, PAVES, ETC. IS FOR ILLUSTRATION PURPOSES ONLY AND HAS BEEN PROVIDED BY THE CIVIL ENGINEERING DEPARTMENT OF MERRILL ENGINEERING, INC.
3. LOCUS PROPERTY BOUNDARY ON THE TOWN OF BEDFORD LEXINGTON'S MAP PAGES 74, 77, 78, 82, 83, 84, 85, 86, AND 88.



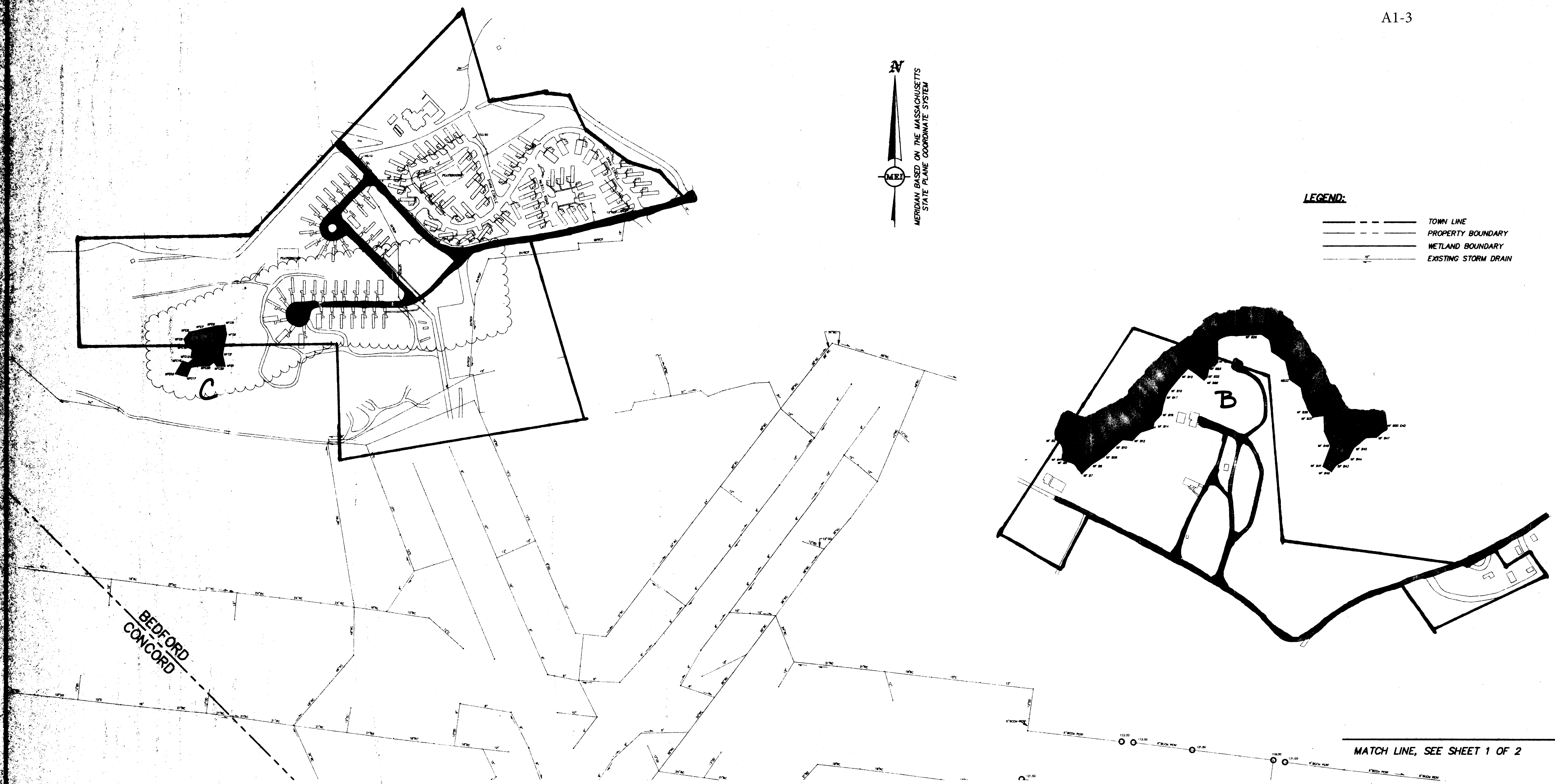
NETLAND DELINEATION PLAN
 BEDFORD, MASSACHUSETTS
 MERRILL ENGINEERING, INC.
 PREPARED FOR
 HANSON FIELD AIR
 SCALE 1" = 200'

MERRILL ENGINEERING, INC.
 1000 WASHINGTON STREET
 BEDFORD, MASSACHUSETTS 01730
 TEL: (617) 271-1111

3/15/85	3/15/85	3/15/85	3/15/85
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3/15/85	3/15/85	3/15/85	3/15/85



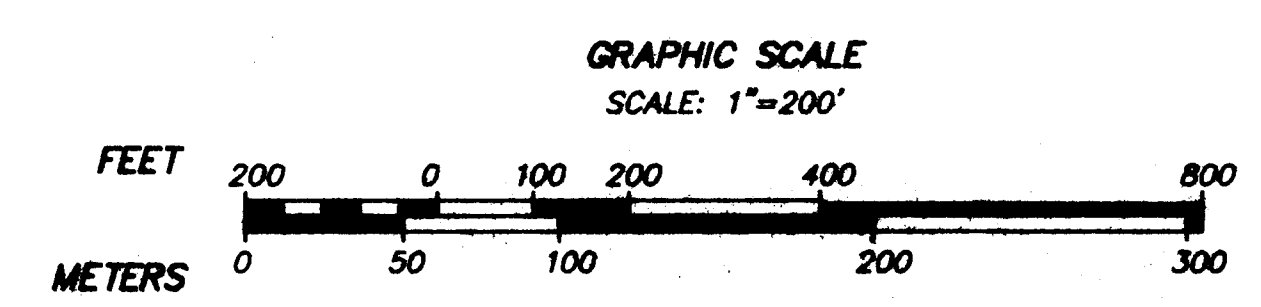
- LEGEND:**
- TOWN LINE
 - PROPERTY BOUNDARY
 - WETLAND BOUNDARY
 - EXISTING STORM DRAIN



MATCH LINE, SEE SHEET 1 OF 2

NOTES:

1. BORDERING VEGETATED WETLANDS DEMARCATED BY LEC IN THE FALL OF 1994 AND LOCATED BY MERIDIAN ENGINEERING, INC. IN THE FALL OF 1994.
2. THE SOLE PURPOSE OF THIS PLAN IS TO DEPICT THE LOCATION OF BORDERING VEGETATED WETLANDS. THE LOCATION OF ALL OTHER FEATURES, SUCH AS MUNICIPAL BOUNDARY LINES, BUILDINGS, ROADS, FENCES, ETC. IS FOR ILLUSTRATIVE PURPOSES ONLY AND HAS BEEN PROVIDED BY THE CIVIL ENGINEERING DEPARTMENT OF HANSCOM AIR FORCE BASE.
3. LOCUS PROPERTY DEPICTED ON THE TOWN OF BEDFORD ASSESSOR'S MAP PAGES 76, 77, 78, 82, 83, 86, 87, 88, AND 90.



DWG. No. 2570BED2

REVISIONS				
NO.	DATE	DESCRIPTION	BY	CHK'D

<p>WETLAND DELINEATION PLAN 2 LOCATED IN BEDFORD, MASSACHUSETTS (MIDDLESEX COUNTY)</p>	
<p>PREPARED FOR HANSCOM FIELD A.F.B. SCALE: 1"= 200' DATE: FEBRUARY 16, 1995</p>	
<p>MERIDIAN ENGINEERING, INC. <small>100 CORPORATE PLACE, SUITE 100 FRAMINGHAM, MASSACHUSETTS 01900 TELEPHONE: (908) 626-7328</small></p>	
<p>SHEET No. 2 OF 2</p>	<p>PROJECT No. 2579</p>

Town of Bedford
Select Board
Town Hall, 10 Mudge Way
Bedford MA 01730

Mr. Donald Scata
Office of Environment and Energy (AEE-100)
Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591
Submitted via <https://www.regulations.gov/#!submitComment;D=FAA-2021-0037-0001>

March 8, 2021

Re: Neighborhood Environmental Survey and Noise Research Portfolio, Docket No. FAA-2021-0037

Dear Mr. Scata:

Thank you for the opportunity to submit public comments regarding the Neighborhood Environmental Survey and Noise Research Portfolio, Docket No. FAA-2021-0037.

The Bedford Select Board agrees with the survey's conclusion showing a substantial increase in the percentage of people who are highly annoyed by aircraft noise, regardless of decibel level, and the insufficiency of the Schultz Curve as a model for measuring resident annoyance. Although neither our local airport, Laurence G. Hanscom Field (BED), nor the nearby Boston Logan airport (BOS) were included in the research, our community has experienced similar significant increases in actual and perceived aircraft noise over the past several years.

BED's effect on noise levels in Bedford can be measured in several ways, using the Massachusetts Port Authority's (Massport) own data compiled from flight operations, resident noise complaints, and noise measurements through BED's six localizers, two of which are located in Bedford.

From 1977 to 2018, tower counts out of BED decreased 48%, from 235,750 in 1977 to 121,664 in 2018. As the 1977 Hanscom Master Plan noted from the start, however, individual noise events are the greatest source of community concern, rather than overall noise from BED operations. Having fewer planes in the air means little if those planes are creating more, and more significant, noise events for residents in our community.

Evidence of noise events in Bedford can be seen through the following metrics:

- **Noise complaints:** In just the past two years, total noise complaints at BED have increased 263%, from 768 in 2018 to 2,019 in 2020.
- **Touch-and-gos:** BED hosts several flight schools, where pilots train on single-engine piston aircraft and perform takeoff and landing maneuvers called touch-and-gos. Touch-and-gos count as two separate operations in tower totals, doubling the number of noise events for nearby

residents from a single flight. In 2018, touch-and-gos accounted for 31.1% of all aircraft operations, at 42,280 flights.

- **db levels at BED localizers:** BED has six localizers to measure noise levels in its surrounding communities. The two localizers in Bedford, RMS ID 32 (Bedford Localizer) and RMS ID 34 (Bedford–DeAngelo Drive), consistently measure at or near 60 decibels, far above the baseline 50 db outlined in the NES.

The Town of Bedford encourages the FAA to consider the following, in response to this NES and in future research regarding aircraft and airport noise:

- **Impacts of area navigation (RNAV)** in concentrating flight paths over certain neighborhoods. While RNAV may reduce the total number of residents experiencing disruptive aircraft noise, the residents who are under these flight paths carry a disproportionate share of unwelcome and excessive noise events.
- **Periodic use of actual noise measurement** to inform and improve models. We recognize that FAA has determined that noise modeling is a more practical way of reliably determining geospatial noise events in surrounding communities. We feel, however, that these models should be regularly compared and revised according to actual noise measurements from localizers to ensure greater accuracy.
- **Revisiting approved flight paths for pilot training** to avoid saturation over certain areas. Our partners at Massport have developed guidelines for appropriate training operations that they share with flight schools and pilots, but FAA is the responsible entity for enforcing pilot behavior and noise issues in the air.
- **More frequent and accessible communication between FAA and local communities,** to address problems sooner and more effectively. Through our involvement in the Hanscom Field Advisory Commission (HFAC) and Hanscom Area Towns Committee (HATS), we communicate regularly with Massport and share concerns about aircraft noise, among other airport-related topics. Massport’s responsibility for aircraft operations, however, is limited to the ground, so its ability to mitigate noise disturbances is similarly limited.

Again, we appreciate the opportunity to share our thoughts on the Neighborhood Environmental Survey and Noise Research Portfolio, Docket No. FAA-2021-0037.

Sincerely,
The Bedford Select Board
Ed Pierce, chair
Margot Fleischman, clerk
Bopha Malone
Emily Mitchell
William Moonan

cc: Gail Lattrell, Director, New England Region, FAA
Sharon Williams, Director, Hanscom Field/Massport
HFAC: Christopher Eliot, Margaret Coppe, Thomas Hirsch
HATS: Suzie Barry, Jonathan Dwyer, Linda Escobedo

**APPENDIX 3:
Town of Bedford comment on EPA
proposed lead finding, January 10, 2023**

Town of Bedford
Select Board
Town Hall, 10 Mudge Way
Bedford MA 01730

U.S. Environmental Protection Agency
EPA Docket Center, OAR
Docket EPA-HQ-OAR-2022-0389
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460.
Submitted via <https://www.regulations.gov/document/EPA-HQ-OAR-2022-0389-0001>

January 10, 2023

Re: Proposed Finding that Lead Emissions from Aircraft Engines that Operate on Leaded Fuel Cause or Contribute to Air Pollution that May Reasonably Be Anticipated to Endanger Public Health and Welfare, Document ID EPA-HQ-OAR-2022-0389-0001

To Whom It May Concern:

Thank you for the opportunity to submit public comments regarding the EPA’s proposed finding regarding lead emissions from aircraft, Document ID EPA-HQ-OAR-2022-0389-0001.

Laurence G. Hanscom Field (BED) is a general aviation facility operated by the Massachusetts Port Authority (Massport) and located partially within the Town of Bedford. The Bedford Select Board agrees with the proposed finding that lead emissions from aircraft contribute to air pollution and endanger the health of residents who live near BED and under or adjacent to flight paths.

According to the 2021 Annual Noise Report from Massport, the annual FAA tower count for operations from 7:00am to 11:00pm was 124,580. Of that total, 55% of all operations were single-engine piston (SEP) aircraft, flown by private owners and flight schools, with touch-and-gos—brief, repeated takeoffs and landings, also called “locals”—comprising 50–60% of all SEP flights. These older planes are one of the few remaining aircraft that still use leaded avgas, which means residents of Bedford and surrounding towns are particularly vulnerable to lead emissions from aviation.

We know that there is no safe level of lead exposure for humans. The United States has taken steps to reduce or eliminate lead exposure, especially in children, through regulations for manufacturing and operations in many industries. Continuing the work of reducing lead exposure by acknowledging the risks of leaded avgas emissions makes sense, and would have significant benefits to the people of Bedford and all those who live near our nation’s airports.

The Bedford Select Board urges the EPA to take action as recommended in the proposed finding, to reduce the dangers to public health and welfare under the terms of section 231(a) of the Clean Air Act.

Sincerely,
The Bedford Select Board
Emily Mitchell, chair; Bopha Malone, clerk; Margot Fleischman; Shawn Hanegan; and Ed Pierce

Town of Bedford
Select Board
Town Hall, 10 Mudge Way
Bedford MA 01730

Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE
Room W12-140, West Building Ground Floor
Washington, DC 20590-0001

June 12, 2023

Re: Docket FAA-2023-0855

To Whom It May Concern:

The Bedford Select Board commends the FAA for undertaking a review of its current noise policy. **We believe that transitioning to an expanded system of metrics would provide a more accurate understanding of the impact of aviation noise on individuals and communities.**

Laurence G. Hanscom Field is a general aviation facility operated by the Massachusetts Port Authority (Massport) and located partially within the Town of Bedford. The current system of a single metric, DNL, to measure noise, along with the 65-decibel threshold to assess significant noise impacts, is inadequate to understand and address the impacts of aviation noise from Hanscom Field on local residents.

DNL gives additional weight to aviation noise occurring overnight, when sleep is more likely to be disrupted. Our residents, however, have also noted **significant disturbances during the day**, making it difficult to enjoy the outdoors, work from home, or carry on conversations in their backyards. These disturbances have long-term effects on the health and well-being of Bedford residents.

We encourage FAA to **discontinue use of the Schulz curve in favor of the more recent National Curve**, as a measure of annoyance from noise. The National Curve better reflects the current experiences of people living near airports and under flight paths, and its use may expand the boundaries delineating significant noise impacts around the airfield.

Of the additional metrics suggested by the FAA, we encourage use of the following:

- **Equivalent Sound Level (8 hour Leq):** This cumulative metric offers more flexibility and accuracy to determine the levels and impact of aviation noise over time, both on a daily basis and in shorter increments. The 8-hour Leq could potentially be used to identify significant noise events and attribute noise complaints to those specific events.

- **Number Above (NA) and Time Above (TA):** These single-event/operational metrics provide a more accurate picture of the actual experiences and impacts of aviation noise on residents than an averaged metric such as DNL.
- **Average Individual Exposure (AIE):** This single-event/operational metric can support an individual's assessment of significant aviation noise at their location, and could help FAA review and potentially revise its flight paths to reduce persistent noise in particular neighborhoods.

We also encourage FAA to improve its response policy for individuals who submit noise complaints. Currently, a resident can submit a complaint to the local airport authority (in our case, Massport) and/or directly to the FAA, and receive a notification that their complaint has been received. There is no easy way, however, for a complainant to receive additional information or ask further questions about the causes of the complaint, and FAA rarely reports that any action has been taken in response to a complaint. Residents have told us they do not feel their concerns about aviation noise in their neighborhoods are truly heard or addressed by Massport or FAA.

Again, we appreciate the opportunity to submit public comment, and support a change in FAA noise policy to use an expanded system of metrics to measure noise.

Sincerely,

The Bedford Select Board

Bopha Malone, chair; Shawn Hanegan, clerk; Margot Fleischman; Emily Mitchell; and Paul Mortensen

Town of Bedford
Town Hall, 10 Mudge Way
Bedford MA 01730

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alexander Strysky, MEPA Analyst for the Project
100 Cambridge Street, Suite 900
Boston MA 02114
VIA EMAIL: Alexander.strycky@mass.gov

Re: EEA 16654, L.G. Hanscom Field North Airfield Development

Dear Ms. Tepper and Mr. Strysky:

Thank you for the opportunity to submit public comments regarding the proposed North Airfield Development at L.G. Hanscom Field in Bedford, EEA 16654.

The proposed North Airfield development lies within the Town of Bedford and relies on Town infrastructure to operate. Our residents will feel the greatest impact from both construction and daily operations of the new facilities. We encourage the Proponent to consider more broadly the needs and interests of the Town, particularly of the residential neighborhoods both west and east of the Project boundaries, and the youth sports facility located directly across Hartwell Road from the Project.

The following comments come from the Select Board and Town departments, including Public Works, Fire, Health and Human Services, Planning, and Code Enforcement.

I. INFRASTRUCTURE

The proposed Project creates substantial impacts to the Town of Bedford's infrastructure, including roadways and utilities. We understand that Massport is exempt from local zoning regulations, though the Project will require several regulatory permits and approvals from the Town (page 1-7, Table 1-3).

The full extent of growth and activity in the North Airfield area cannot be understood without acknowledging the ongoing construction of T-Hangars abutting the west side of the Project. These hangars should be reflected on the site plan, if only in grayscale, to allow local officials and residents to see the full picture of increased development at Hanscom Field.

Traffic

The Project will significantly impact local roads in Bedford. Hartwell Road is a narrow local road that curves along the edge of the airfield property, with limited sight distance in many key spots. Other local access points include Loomis Street, South Road, and the Hanscom AFB "Fam Camp" area near the northeast end of Runway 5-23. During the 2017 reconstruction of Runway 11-29, Massport used local

roads in Bedford (chiefly Hartwell Road and South Road) for construction vehicle access, causing persistent and significant disruptions to neighborhoods and residents. **We urge consideration of the following items related to traffic and roadway impacts from the Project.**

1. Traffic Study

A full traffic analysis should be required to determine average daily trips and peak hour impacts to the intersections of Hartwell Road at Concord Road and Hartwell Road at South Road, including an evaluation of traffic signal warrants for each intersection.

2. Internal Service Roads

We note that the Proponent is exploring the feasibility of using the airfield to accommodate construction vehicle traffic and ongoing fuel delivery (page 1-5, 1.5 Anticipated Project Schedule and Phasing) by constructing a new inner roadway. **We strongly encourage this option, which would allow construction vehicles and fuel trucks to access the Project site from Interstate 95/128 to State Route 2A and Hanscom Drive, which are designed to handle heavy equipment at high volumes, unlike Bedford’s local roads.** The Proponent should confirm whether such internal circulation route used for construction will be closed following completion of the Project.

The scope of review should be expanded to include any potential changes to the existing service road that extends around the periphery of Runways 23 and 29. There are several wetlands, watercourses, and flood plains adjacent to the service road that could be impacted by any proposed improvements or construction activity. The types of vehicles and internal traffic that might use this service road should be identified (e.g., fire apparatus, fuel trucks, service vehicles, employee vehicles, etc.). **If an internal service road is not available between facilities on the south and north sides of the airfield, the resulting impact on local streets from moving people and materials around the airfield must be examined and addressed.**

The scope should also address whether there is any proposed connection of a service road from the T-hangars westerly to the existing service road around Runway 11.

3. Long-term Changes to Roadways

The Proponent proposes to use “an existing curb cut” (ENF, page 6) off Hartwell Road for staff and passengers to enter the Project area, while Figure 1.2 appears to show two curb cuts—one for the North Airfield and one for the Navy Parcel. **We encourage the Proponent to minimize the use of Hartwell Road as an access point for the Project,** especially during construction.

Among mitigation options for increased traffic impacts, **the DEIR should examine potential changes to the layout of Hartwell Road,** including possible realignment to reduce the sharp curvature of the roadway along the Project boundaries and improve sight distance and safety for all users. The project may affect the public access easement over Hartwell Road where the land is currently owned by the Federal Government; additional information is required on this point.

The Town encourages assessing the feasibility of adding sidewalks and bike lanes on Hartwell Road, for eventual connections to an ongoing effort to expand pedestrian mobility and the sidewalk and trail network throughout Bedford.

Utilities

In preparation of the DEIR, **the Proponent should confirm with Bedford DPW whether improvements are required in the water and sewer system to accommodate the Project.** The List of Anticipated Regulatory Permits and Approvals (page 1-7, Table 1-3) shows a Water Service Connection and Sanitary Sewer Service Connection for the Navy Parcel only, not for the new construction at the North Airfield. Given the anticipated 13,500 gallons per day of additional water use and 12,150 gallons per day of additional wastewater generation and treatment, as outlined in the Summary of Project Size and Environmental Impacts (ENF, page 3), we expect each parcel will need its own water and sewer connection and associated permits, and may also be subject to Inflow and Infiltration under the Town's Sewer Bylaw. Additional capacity analysis for both water and sewer demand should be performed by the Town's consultants at the Proponent's expense for the full buildout of both sites.

The applicant team should also explore potential electric supply/capacity issues, including the potential need for expanded capacity at the existing substation at the intersection of Hartwell Road and South Road; installation of new wires/poles/transformers along Hartwell Road; or installation of any on-site substation to supply the Project, given the Proponent's stated intent of increasing the use of electric-powered aircraft.

Capacity/Growth

The Proponent states that the Project will decrease operations in and out of Hanscom Field, due to reductions in so-called ferry flights by aircraft based elsewhere. The ENF repeatedly notes that current hangar capacity is oversubscribed, with existing hangar owners reporting wait lists for aircraft wishing to be housed at Hanscom. Without clear data on the number of ferry flights and existing hangar capacity, we question the assumptions underlying the Project and the expectation that the Project will meet both current and future needs. **We ask the Proponent and Massport to provide current data on the number of ferry flights and justification for the claim of fewer total flights due to the Project.**

II. ENVIRONMENTAL

The Project will have significant impacts on Bedford's natural resources, including stormwater management, air quality, noise pollution, and wetlands and wildlife protection.

Noise

Bedford is a member of the Hanscom Field Advisory Commission (HFAC), a coalition of neighboring towns that meets monthly with Massport to review noise and capital project reports, among other relevant items. Bedford residents consistently log the highest number of noise complaints each month

from aircraft operations, including takeoffs, landings, and touch-and-gos. Flights in the air are under the jurisdiction of the FAA, but Massport has jurisdiction over aircraft when they are on the ground.

Aircraft stored in the new hangars will need to taxi to and from the Project area to the runways. Adjacent residential neighborhoods will feel increased noise impacts due to the proximity of idling aircraft, maintenance, and site operations. The noise from this ground movement may not be captured in monthly noise reports, which rely on technology that matches the site of a noise complaint with available data on planes in the air (airnoise.io, Flight Tracker, etc.).

We urge Massport and the Proponent to minimize or absorb such ground noise, whether through physical barriers, restrictions on operations, or other measures, and to take proactive steps to measure actual noise in the future.

Stormwater Management

The Proponent should be aware of the Town's Stormwater Management Bylaw and Regulations, as these standards are more stringent than MassDEP's stormwater standards. Per the project description (ENF, page 6), the site will "be designed to encourage positive drainage away from the hangar buildings." Water that drains away from the hangars must go somewhere, and we are concerned that additional stormwater could end up in Bedford's neighborhoods, wetlands, or conservation lands.

We appreciate the consideration for pervious pavement in parking and other areas to reduce the potential for excessive stormwater runoffs, but **we remain concerned about impacts of new construction and use on local waterways and our water table.**

Wetlands/Aquifer Protection

The North Airfield site lies within one of the Town's aquifer protection districts, and wetland buffers cover more than half of the total airfield property. Since the 2017 ESPR, Bedford has ceased use of its Shawsheen wells due to PFAS/PFOA contamination, which we believe was caused at least partly by firefighting foam and other chemicals in use on and around Hanscom Field. The North Airfield and Navy Parcel sites are also adjacent to the former Naval Weapons Industrial Reserve Plant, which remains under EPA cleanup protocols as a Superfund site.

An initial wetland survey of the development area by a third-party consultant would be helpful. The Town GIS map shows an area of wetlands north of the long east-west running wetland feature. While isolated vegetated wetlands are not protected under the state Wetlands Protection Act, they are under the Town's Wetlands Bylaw.

In a briefing to Bedford Town officials prior to the filing of the ENF, the Proponent indicated that no new fuel storage was intended within the Project. Presenters at the virtual information session on February 6, however, indicated that on-site fuel storage was now proposed. **The DEIR should include identification and method of such storage, and the measures to be taken to ensure protection of the surface waters and groundwater.**

Air Quality/Emissions

The Air Quality section of the ENF (page 24) claims that the Project does not meet or exceed any review thresholds related to air quality. We caution the Proponent, however, that many of the pollution sources outlined by MEPA are not regularly tested at Hanscom Field, or are evaluated using modeling only and not sampling, based on the 2017 ESPR and the approved scope of the 2022 ESPR. We note in particular that the state's definition of "lead" under 301 CMR 11.03(8) only relates to lead paint, as measured by the proportion of residences built prior to 1960 (Appendix B, EJ Screen Report). In 2021, 55% of all operations at BED were single-engine piston aircraft. These older planes are one of the few remaining aircraft that still use leaded avgas, which means **residents of Bedford and surrounding towns are particularly vulnerable to lead emissions from aviation**. These emissions are not captured by MEPA's review and have not been measured in ESPRs, but are likely present in soil and groundwater at the airfield.

Additionally, given that the fueling concept is not yet defined, **modeling for air quality should include all potential fueling scenarios**: specifically, whether the trucks used to fuel aircraft onsite will be filled from offsite or onsite (on-airport) fuel farms. The filling from onsite fuel farms could represent a doubling of the opportunity for onsite HAP/VOC emissions.

More broadly, prevailing winds will transport ambient fumes from fueling operations and idling aircraft exhaust into an adjacent residential neighborhood. During construction, these winds may also transport dust and other sediments. **The DEIR needs to identify mitigation measures for airborne impacts**, both during construction and during future operations.

Wildlife

The development site abuts both Core Habitat and Critical Natural Landscape as depicted on the MA Division of Fisheries & Wildlife biomap. **Wildlife impact analysis should be undertaken to evaluate the impacts to habitat for the many species of wildlife that live on the airport grounds**.

Other Environmental Concerns

- The DEIR should address the status of any remaining contaminant mitigation affecting the former Navy Hangar site.
- New impervious surfaces created by additional pavement and rooftops, combined with the loss of existing vegetation, may yield heat island impacts. The DEIR should evaluate the microclimate created by the Project and identify possible mitigation measures.

III. ADDITIONAL CONSIDERATIONS

Emergency Response

We understand that discussions to date suggest Hanscom's internal Fire Department would respond to incidents involving aircraft and hangars, but Bedford's Fire Department would respond to incidents

involving civilians and office spaces. This is not an environmental issue for the ENF, but something that needs further negotiation, particularly with regard to local taxes and/or a PILOT agreement between the Proponent and the Town of Bedford.

Public Process and Notifications

We urge the Proponent to conduct proactive outreach to residents in Bedford and the other Hanscom area towns, rather than wait for community members to request such a meeting (Appendix B, page 3). Given the significant impacts the Project will have on our community, during both construction and later daily operations, connecting with residents, boards, and professional staff early and often to understand our concerns will be key to a productive relationship in the long term. The Town is happy to coordinate with the Proponents and Massport to arrange such meetings.

Educational Partnerships

The ENF lists as a project benefit a potential partnership with Bridgewater State University and its Aviation Management degree program. We note that Middlesex Community College (MCC), located in Bedford and Lowell, offers an associate's degree program in Aviation Maintenance Technology, in partnership with the National Aviation Academy at Hanscom Field. If the Proponent seeks local students to train and recruit for future employment opportunities, **we encourage a partnership with MCC as well.**

Again, we appreciate the opportunity to submit public comment on this project. We look forward to developing a productive relationship between the Proponent and the Town of Bedford as the permitting process continues.

Sincerely,

The Select Board of Bedford

Emily Mitchell, chair; Bopha Malone, clerk; Margot Fleischman, Shawn Hanegan, and Edward Pierce

Office of the Bedford Town Manager
Bedford Department of Public Works
Bedford Planning Department
Bedford Fire Department
Bedford Code Enforcement Department
Bedford Health and Human Services Department
Bedford Housing & Economic Development Department

Cc: State Representative Kenneth Gordon
State Senator Michael Barrett
Christopher Eliot, Chair, Hanscom Field Advisory Commission