STOP PRIVATE JET EXPANSION
at **Hanscom** or **Anywhere**
www.spje.org

June 11, 2024

RE: EEA No. 16654 L.G. Hanscom Field North Airfield Development, Bedford, MA

Dear Secretary Tepper and Mr. Strysky,

This comment is being submitted by Stop Private Jet Expansion at Hanscom or Anywhere (SPJE), a coalition of more than 80 state and local organizations, among them, 350 Mass, Mass. Climate Action Network, Sierra Club Mass., Mass. Power Forward, Mothers Out Front Mass., Third Act Mass, and UU Mass. Action. Together, we represent tens of thousands of people in Massachusetts who are working on issues regarding climate, clean energy, environmental justice, biodiversity, natural and historic preservation, and public health, and who are united in our efforts to rein in climate change.

In our view, building a massive new facility for expanded private jet use – *recognized as the most carbon-intensive form of travel per passenger-mile* – has no place in the midst of a climate crisis when our state, national, and global climate goals call on all sectors to reduce their carbon footprint drastically and immediately if we are to avert the worst consequences of our climate crisis.

The fossil fuel facility described in the DEIR is blatantly antithetical to the Governor's commitments to deep and meaningful decarbonization efforts which municipalities across the state have been working arduously to achieve. It should not be built at Hanscom – nor Logan, nor anywhere – if we are serious about meeting critical climate benchmarks, as we must be.

The DEIR is deeply flawed and grossly inadequate in a number of ways:

- It omits the primary source of greenhouse gas (GHG) emissions associated with the Project: private jet emissions *in flights* and increased private jet flights.
- It makes misleading claims about environmentally beneficial features to disguise the Project's harms.
- It fails to consider, or adequately consider, other types of environmental impacts associated with the Project: ultra fine particulate emissions, PFAS contamination and its potential spread due to the Project, and other volatile organic compounds. All of these impacts are improperly reported.

As a result, the DEIR has not adequately described and analyzed the Project and its alternatives, nor assessed its potential environmental impacts and mitigation measures, as required by 301 ~~CMR 11.06(1)(b)~~* for a finding that the DEIR is "adequate." **The failings of the DEIR are so significant and fundamental that the document cannot be considered "generally responsive to the requirements of 301 CMR 11.07 and the Scope" and cannot be cured by "additional description or analysis in a final EIR." We respectfully suggest that there is no alternative**

* CMR 11.01(1)(b)

under 301 CMR 1108(b) other than determining that the DEIR is inadequate, and therefore we respectfully request that the Secretary require the Proponent to file a Supplemental DEIR appropriately addressing the many deficiencies of the current document.

Failure to disclose increased flights and their resultant effects.

The DEIR ferry flight claims are central to the Proponent's rationale for constructing the Project. Specifically, the DEIR asserts that the immense two-thirds-mile long, 522,380 sf private jet facility – greater in size than all the existing private jet facilities combined*-- will ***reduce*** ferry flights, ***reduce*** overall operations and ***decrease*** GHG emissions, defying a body of induced demand studies and common sense. *[*compiled from Draft 2022 ESPR]*

Finding these zero-impact claims to be implausible, SPJE commissioned the firm Industrial Economics, Inc. (IEc) to independently evaluate the Proponent's ferry flight and GHG claims. IEc is a respected economic and environmental consultant that has provided services to government agencies, major corporations, and non-profits. Its clients include Federal agencies such as the EPA.

In contrast to the DEIR's claim that 3,543 ferry flights per year would be eliminated as a result of the Project, IEc found that 132 ferry flights per year would be eliminated, which would result in a decrease in **75** flight operations per year. The report found, however, that the hangar capacity for new aircraft would *add* approximately **6,000** flight operations, overwhelming any savings.

IEc also found that the 132 eliminated ferry flights would save approximately 100 tons of GHG per year, while the additional 6,000 overall flights would generate approximately 150,000 tons of GHG emissions per year.

It must be noted that the DEIR ferry flight analysis was based on a model with overly broad criteria and did not study detailed flight data, whereas the IEc study was based on detailed flight data. The IEc study identifies additional elements of the flawed methodology used in the DEIR's ferry flight analysis.

If the correct number of ferry flights were used, the DEIR would show a substantial increase in overall flights, GHG emissions and other environmental effects. The Proponent should be required to disclose a full and accurate account of the GHG and other environmental impacts resulting from the increased flight operations.

Failure to disclose total emissions of the resultant flights

The Project enables new private jets and flights, so the analysis should include GHG emissions for those flights. This must include the GHG emissions *in flight* and not just the misleading use of the GHG emission figure from the AEDT model which was designed to document local concentrations of GHG from take-offs and landings and flights under 3000 feet (Table 8-5, p. 8-11). The Proponent cannot take the view that nobody is responsible for in-flight emissions, which were enabled by the proposed Project.

Recognized standards exist for calculating GHG emissions for private jets in flight. Results can range pending on factors used such as: fuel consumption, hours per flight, hours per year, number of private jets accommodated by the Project, etc. As a result, existing calculations for the anticipated GHG impacts of the Project have typically ranged from 150,000 tons of CO2e per year to 220,000 tons, and some are more. Notably, all of these calculations are orders of magnitude greater than that of the 30,686 tons CO2 per year reported in the DEIR's AEDT table (Table 8-5, p. 8-11).

The Proponent should be required to provide a full and accurate account of GHG emissions generated by the Project. These should be calculated as CO2e, not CO2, which is the correct unit for calculating GHG emissions from private jets in flight.

Misleading Claims about "beneficial" features to disguise environmental harms

The DEIR claims that the Project will be Net Zero, with solar arrays, that it will be a national example of sustainable aviation with electric and Sustainable Aviation Fuels (SAFs) features, and will "accelerate the Commonwealth's decarbonization goals" (p. 1-18), thus, creating the impression that when the doors open, the facility will be operationally sustainable, filled with clean, green private jets whose harms to the climate and environment are offset by these features.

Under examination, it becomes apparent that the DEIR claims are not actual plans, but hypothetical aspirations for some distant time in the future *after* the Project is built and *after* it is established as a fossil fuel facility for the duration. **A project disclosure should not claim an offsetting benefit for features that may never be installed and many not even be feasible.**

Below are a few additional remarks about the DEIR's green claims.

Net-Zero Claims

The Net Zero claim for the Project pertains *solely* to infrastructure and ground-based sources of emissions, and entirely *excludes* emissions from private jets in flight which overshadow them. The DEIR states that the Project will be "an innovative example of sustainable development, in alignment with Massport's climate and sustainability goals," but these goals also focus solely on ground-related sources of CO2, as evidenced by the Massport Net Zero Roadmap for 2031.

Even the solar installation to accomplish this is just a possible future option. The DEIR provides many solar details which, again, ultimately amount to aspirations, not plans. The DEIR discusses solar measures in noncommittal language: "The Proponent *intends to* design and construct" [not "will"]; the buildings "*may be* appropriate for PV systems" and will be made "solar *ready*." Of the 18 hangars that *may* be ready for a solar array, it commits to "a solar array." (pp 1-6, 1-7, 9-23)

Moreover, the DEIR includes an escape clause for allowing the Proponent to back out entirely from their solar aspirations: "Installation of rooftop arrays" are "subject to interconnection feasibility with the utility." (p. 1-6) This relieves the Proponent of any responsibility for ensuring that the solar array plan will actually be installed and that the Project will be Net Zero.

The DEIR's claim that the Project will achieve Net Zero should not be accepted as mitigating climate change impacts unless the Proponent can show that in fact the arrays can be constructed and the utility will find interconnection to be feasible. The DEIR contains no analysis whatever of this important issue.

Sustainable Aviation Fuel Claims

A recently released comprehensive report on the status of Sustainable Aviation Fuels by the Institute for Policy Studies states that:

> "Realistic increases in SAF production are decades off. In 2022, the U.S. produced just 15.8 million gallons of SAF. It would **require an 18,887 percent production increase** over the next six years just to meet the Biden administration's 2030 target of 3 billion gallons." (Summary report, p. 2)

It is disingenuous for the DEIR to claim that the Project will exemplify sustainable aviation when, by the Proponents' own admission, they are fully aware that SAF and electric aircraft are a long way off in the future:

> "…**the aviation industry projects use of alternative/clean-fuel aircraft (i.e., electric or SAF) to be approximately 10 percent of aircraft by 2030** *so that delaying later phases [of the Project's construction] contingent upon the availability of SAF or electric aircraft is not feasible."* – (p. 3-1) [bolding and italics are ours]

This statement clearly indicates the intent to burn fossil fuels for the foreseeable future, if not for the lifetime of the installation. A project which includes features to reduce impact should rely only on technologies and products that will in fact be available and used by the project. That is especially important with regard to climate change, because the crisis is already upon us. Even if SAF ultimately might be the key to making aviation sustainable, which is certainly subject to question, the DEIR does not show that that promise could be filled soon enough to mitigate the facility's effects in the next decade or so, the period of time that matters.

The sustainable aviation claim is further undercut by the fact that **no airport nor aircraft facility has the authority to *require* the use of SAFs or electric operated aircraft** according to FAA rules, and that according to all known analysis, SAF will be 2-3 times the cost of fossil jet fuel. So, even if SAF were available, there is no assurance it would be used. **The DEIR does not begin to consider the eventuality that SAF will be available but not in fact used, as it should.**

The DEIR's emphasis on SAFs as a sustainable alternative for private jet travel is misleading on other accounts:

- SAFs generate as much CO2e as fossil fuels in the atmosphere
- For the foreseeable future, SAFs need to be mixed with, and make up only a fraction of, conventional fossil-based jet fuel.
- The worst scenario might be if SAFs (biofuels) were successful: They would hijack arable land necessary for food production, require a huge investment in public funds,

- and the power required for refining would overwhelm electric grids necessary for everyday needs. (See newly released report on SAFs)

If the Proponent's arguments based on the development of SAFs are to be considered, then surely the DEIR should investigate the potential environmental effects of producing those SAFs at scale.

The DEIR fails to substantiate its claims for sustainable aviation, **and therefore the Secretary should discount these claims as offsets to the environmental harms that can be realistically expected from the Project**. The Project should be evaluated for what it would be on Day 1, a new fossil fuel infrastructure that will generate at least **150,000 new tons of CO2e each year,** and it is *this* impact that the Proponent should be required to document, not what they *might* be in the future**. Therefore, we ask the Secretary to require the Proponent to consider the Project a fossil fuel facility, and report the full extent of impacts from fossil fuel use.**

Critical Consequence to Proponent's Silence on Impacts – EIS derailed?

The DEIR essentially claims no adverse impacts from the Project. This is fundamentally based on the erroneous claim that it will create no new aircraft operations. The misleading premise that the Project has No Significant Impacts could have potentially critical implications for the upcoming NEPA EA / MEPA FEIR review.

If the Proponent's premise of No Significant Impact is accepted, it could relieve the Proponent of an important full-scale EIS review (Environmental Impact Statement) under NEPA (National Environmental Policy Act) that should be conducted without fail.

The public is concerned that the Project will *only* undergo the shorter EA review, which would imply that the FAA has accepted the Proponents' assertions that the Project has no significant impacts and that the FAA has made a Finding of No Significant Impact (FONSI). This would be unreasonable and unacceptable, and would be met with an outcry of dissent by the public.

The public is concerned that a combination MEPA / NEPA review will fast-track the review process and derail the full-scale EIS review under NEPA. Given that the Secretary's concurrence is needed for the combination review, **we request the Secretary to use her authority, to the extent possible, to recommend to the FAA that a full-scale EIS review will be conducted.**

The Project's expected GHG impacts

After the ferry flight and green claims are dismantled, **the Project is, plain and simple, a massive New Fossil Fuel Infrastructure (NFFI)** with four new underground tanks of jet fuel (20,000 gals each), totaling 80,000 gals, and a 5,000-gal underground tank of leaded avgas.

By comparison, the fuel tank capacities of the three existing private jet facilities at Hanscom are:

80,000 gallons *proposed North Airfield facility*
70,000 gallons Signature
40,000 gallons Atlantic Aviation
40,000 gallons Jet Aviation
(from draft 2022 ESPR)

Note: The Project's fuel tank capacity is more than half of the existing three facilities combined. It should also be noted that the prime source of revenue and economic impact of private jet facilities is the sale of jet fuel.

The Project anticipates 1-2 fuel truck deliveries daily, with each truck carrying 10,000 gallons of fuel. This equates to about **5.5 million gallons of jet fuel per each year** (based on daily deliveries of 15,000 gallons).

By comparison, the entire airport at Hanscom used a total of 11,858,193 gallons of jet fuel at Hanscom in 2021, according to a Massport report. The Project's proposed jet fuel use represents half the entire airport's total current use.

Based on the fuel consumption associated with the Project, it is conservatively estimated that this single facility will generate between **150,000 to 220,000 tons of CO2e per year.**

The Project's climate and environmental impacts in context

The Project would nullify the results of many decarbonization programs that communities across the state are working hard to achieve. How will we ever make critical headway in reducing the state's carbon footprint to avert climate catastrophe when Massport and Runway Realty Ventures are set on expanding theirs?

As a point of reference, **if the Project goes forward, private jet emissions from Hanscom alone could cancel 70% of the climate gains from all solar PV ever installed in Massachusetts.**

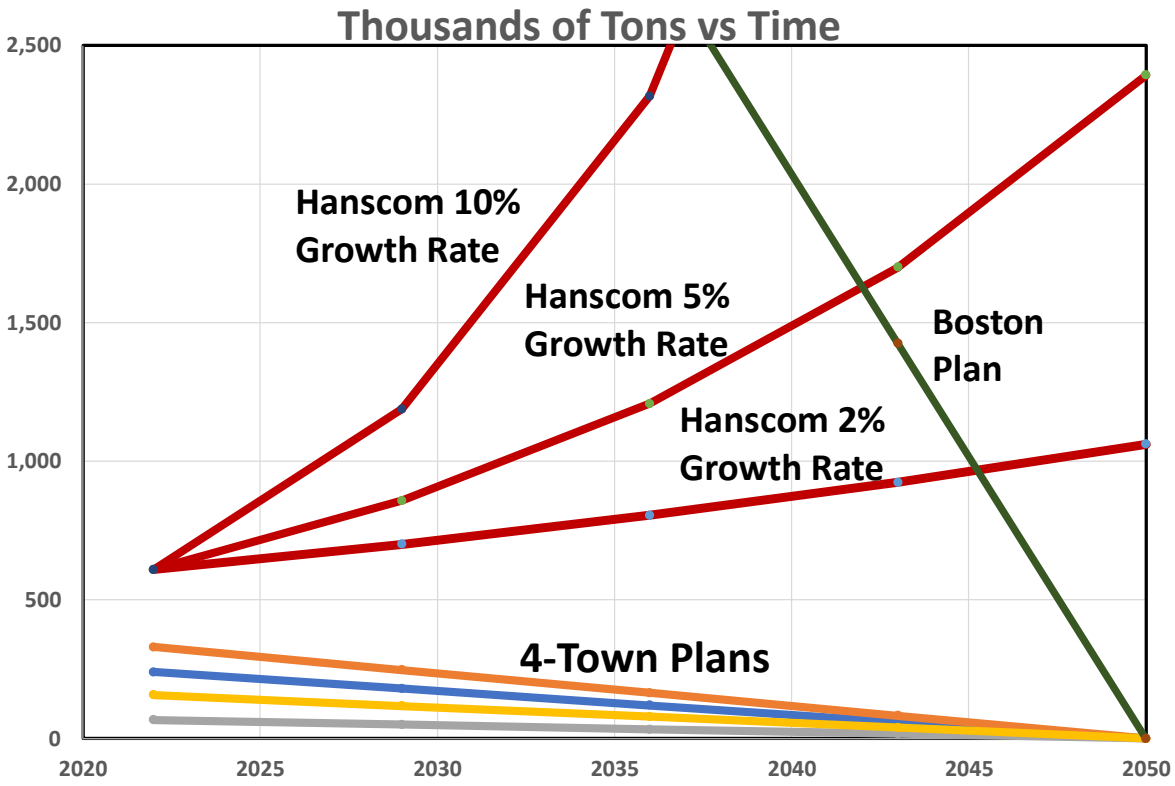
Consider how these emissions fit within Mass CO2e reduction Plans for 2050:

	Today		2050
• **Massachusetts Plan:**	**70 MT**	**>**	**14 MT**
• **Boston Plan:**	**6 MT**	**>**	**0 MT**
• **Typical Town Plan**	**.2 MT**	**>**	**.02 MT**
• **Logan Aviation Plan:**	**30 MT**	**>**	**38 MT** (fuel use and projected growth)
• **Logan Facility Plan:**	**0.1 MT**	**>**	**0 MT**
• **Hanscom Jet Plan:**	**.65 MT**	**>**	**2.4 MT @ 5% per year**

Source*:* North Airfield Climate Impacts PP, SOH, 5/6/23 , Slide 9, updated 6/9/24
Note: Slide 2 reflects Project details from the Proponent's ENF (filed 1/17/23), not the DEIR.

The municipal carbon reduction plans below are aggressive and great efforts are being expended to achieve them, which will require sacrifice on the part of citizens. The plans for Hanscom Field are going in the wrong direction. If the municipal climate plans are achieved, Hanscom Field's CO2 profile will surpass the emissions of the City of Boston before 2050:

See graph next page



Source: North Airfield Climate Impacts PP, SOH, 3/6/24, Slide 5

The Industrial Economic Inc report provides further context:

> "According to carbonbrief.org, under a business-as-usual scenario where the aviation industry grows by 5 percent each year and no substantial improvements to technology or infrastructure are made, **aviation is estimated to consume 27% of the remaining 1.5 degree C carbon budget between 2015 and 2050**.
>
> For this reason, it is of special interest to examine portions of the industry that have the highest emission rates per passenger mile. **The proposed private jet hangar project is one of the largest in the U.S. to create infrastructure enabling the further growth of private jet operations** and has aroused significant public and governmental concerns." (p. 3-4)

Impacts on Logan-area communities

A number of organizations from Boston and Logan-area communities have joined the SPJE coalition to help stop the Project. Halting the private jet hangar expansion at Hanscom will benefit our partners and their communities as well. Continued build-out of carbon-intensive facilities at Hanscom or anywhere will accelerate, not stabilize, run-away climate change and communities in coastal Boston will feel the impacts of rising tides, fierce storms, and flooded subways, sooner than those who live near Hanscom.

In answer to the question, "If not here, then where?", in an age of climate crisis the answer must be "Nowhere." It doesn't matter which airport is spewing CO2e from the climate's

standpoint. In response to the statement, "We have to all share the burden," the answer must be: "Yes, we should all share the burden of cutting back our carbon footprint dramatically, including the Proponents." Both of these oft-stated responses to the Project serve the Proponent's advantage, as they divide and conquer communities, while the Proponent's polluting expansion plans prevail.

The Proponent has asserted that building the Project at Hanscom would reduce ferry flights between Logan and Hanscom. However, the Industrial Economics Inc. analysis found the reverse:

> "In addition to the major shortcomings in the proponent's approach described above, the proponent's analysis indicates that many of the ferry flights to Hanscom originated from the Boston Logan Airport. More specifically, during the February 13 meeting of the Massport Community Advisory Committee, the proponent's consultant indicated that 300 ferry flights originate from Logan. However, during that same February 13 meeting, a Massport representative indicated that there are no based private jets at Logan Airport.
>
> **Therefore, the proposed hangar expansion at Hanscom would not eliminate any ferry flights from Logan**. On the contrary, if there are no based private jets at Logan, the development of hangar capacity at Hanscom may provide an additional source of ferry flights to Logan, increasing operations there." *-- Industrial Economic Inc. Report, Section 4.3: Ferry Flights from Logan Airport, p. 13*

Purpose of the Project: Meet Current and Future Demand

When all is said and done, the driving force behind this immense expansion proposal is not sustainable aviation, but to serve and support the growth of private jet aviation, a lucrative enterprise heavily dependent on the sale of jet fuel. **The only available tool to stop it is to *not* build it.** Once the infrastructure is in place, an airport has no authority to turn away aircraft, according to FAA rules: "Massport and the Proponent cannot lawfully refuse a flight from landing, or limit the type, volume, or frequency of flights that land at Hanscom." (Section 1.6, p. 1-18)

In other words, the only way for this Project to meet state and national climate carbon reduction goals is with the No Build alterative. Under existing conditions, **private emissions from Hanscom alone already negate nearly 50% of the climate gains from all solar PV ever installed in Massachusetts. An expansion of *any size* would produce even further setbacks that our state, and the climate, cannot afford.**

Regarding the relationship between aircraft activity and infrastructure, the following passage under "Forecast Uncertainties" in the FAA Aerospace Forecast FY 2018-2038 reinforces the tenet "Build it and they will come; don't and they won't":

> "FAA's forecasts of both demand and operations are unconstrained in that they assume that there will be sufficient infrastructure to handle the projected levels of activity. **Should the infrastructure be inadequate and result in even more congestion and delays, it is likely that the forecasts of both demand and operations would not be achieved**." *(--underlining and bolding are ours)*

Of particular note, **the FAA itself contradicts the DEIR's fundamental premise that building the hangars is delinked from increased operations**.

Contrary to Massport's claims otherwise, Hanscom is not required to build these hangars to maintain their FAA grant assurances. While an airport is required to build operational and safety features, such as runways, control towers and perimeter fencing to maintain its grant assurances, this does not apply to building hangars, a point we have on good authority.

The Proposal described in the DEIR rests on the presumption that aviation will continue to grow at 2-5% annually (for private jet operations, this is closer to 5-10% annually) to "meet current and future demand." These presumptions are embedded in the missions of the FAA and Massport, both created in the 1950s – well before the world was in a climate emergency, and before the 2021 adoption of climate goals – and they continue to shape and drive fundamental aviation decisions in a conveyor belt fashion.

Bill McKibben describes this phenomenon as *"***the zombie projects of an earlier age lurch forward still, running on momentum and vested interest.**" This is demonstrated in the DEIR's statement: "the North Airfield has been identified as a future aviation development area as far back as the 2005 ESPR" (p. 2-3**). The DEIR *still* relies on a 2005 document as guidance, as though a new era heralded by the 2021 adoption of climate goals for drastic and immediate reductions in carbon did not exist** – and as though nonaviation uses for North Airfield weren't an option.

As a reminder, the old Navy parcel was considered for nonaviation use in 2017: At that time, the much smaller 15-acre planned North Airfield development "described in the 2017 ESPR excluded the Navy Parcel [18.7 acres], which was to be developed separately by others, potentially as a non-aeronautical use." (Section 1.2.2, p. 1-4)

If Massport and the current owners of the Navy parcel, Jeffrey Leerink and Michael Argiros, of Runway Realty Ventures, are serious about aligning the Project with climate stabilization and reduction goals, fresh new Build alternatives in the form of nonaviation scenarios, which would be less carbon intensive, should be considered. The public would be glad to assist with a charrette process.

Two Opposing Central Arguments in the DEIR

The DEIR strains mightily under the force of two opposing assertions: that, the Project will decrease operations and GHG emissions, on the one hand, and that the Project will meet current and future demand (growth), on the other. These contradictory claims are ultimately never reconciled in the DEIR, because they can't be: You can't increase and decrease overall flight operations at the same time – except, of course, by sleight of hand: if all your calculations assume built-in forecasts for growth, which is what the DEIR does.

Notably, comparisons between Build and No Build scenarios are based on 2030 figures (which include built-in forecasted growth), and not on the basis of current conditions**. The Proponent should be required to provide accurate data based on comparisons to current No Build conditions.**

Many consider this Project to be a watershed moment:

Will the Commonwealth's Administration and Agencies exercise the full extent of their powers to seize this historic moment and apply our new climate laws to this super-emitting expansion which flouts them, or will they sidestep this singular opportunity--and obligation--to rein in climate change with politically expedient partial-measures?

We recognize that neither the Secretary nor the Governor have direct authority to approve or deny the Project. We are also aware that cumulative indirect authority is also imbued with the power to shape and shepherd the outcome of events. **We respectfully ask that MEPA's and the Administration's treatment of this Project exemplify their deepest and most unwavering commitment to Massachusetts goals to reduce carbon footprint and stabilize climate change**.

All eyes are on this Project and its outcome whose reverberations will be noted in times to come:

> **New Englanders are fighting against new infrastructure for carbon-intensive billionaire travel. If they win, the significance could be global. -** *Fortune, 11/14/23*
>
> Additional news coverage of the proposed development

Thank you for your time and attention.
Sincerely,

Kati Winchell, Coalition Coordinator
Stop Private Jet Expansion at Hanscom or Anywhere

We ask the Secretary to note these additional issues and omissions in the DEIR:

- **The Project in context of other large, recent expansions:**

The Project's climate and environmental impacts should be evaluated in context of recent major large expansion projects at Hanscom, which the Industrial Economics Inc report has summarized as follows:

> "In the last decade, Massport data show the gross jet hangar space at Hanscom Field has increased from 283,000 sq feet to 478,614 sq ft, representing a 70% increase. The proposed project, at 522,380 gross square feet, represents more than doubling of the airport jet hangar capacity. This single project would add the same level of jet hangar capacity that was built at Hanscom incrementally over the prior 60 years." (p. 4)

- **Potential Project Segmentation re: Taxiway Romeo and North Airfield Box Hangars**
  We ask the Secretary to investigate whether these two plans should be disclosed in a Supplemental DEIR:
  - Upgrading Taxiway Romeo: The Land Swap Agreement between Massport and Runway Realty Ventures dated 10/20/22 notes on p. 9-15 a plan to upgrade Taxiway Romeo (directly adjacent to the Project site) to support Design Group III aircraft

over 100,000 pounds and/or Design Group IV aircraft. It states that this is a desired option "as requested by Runway Realty Ventures." Upgrading Taxiway Romeo is not included in the Proponent's ENF nor DEIR and perhaps should be, because it is integral to the Project's plans to accommodate larger jets.

- Connecting the newly constructed North Airfield box hangars with the Project: 6 new box hangars in North Airfield, built by Atlantic Aviation, are adjacent to and directly to the west of the Project site. The possibility that these box hangars may/will be connected to the Project site in the future have been mentioned verbally. Should the Proponent address this possibility, and disclose their plans in a Supplemental DEIR?

- There is an ongoing **Air Quality study on Ultra Fine Particles** conducted by Dr. Neelakshi Hudda of Tufts University. The second phase of this study begins in July, and the final report is expected in October. UFP can be traced to private jet fuel by the fuel's chemical signature. Initial results indicate that the air quality surrounding Hanscom dramatically exceeds World Health Organization thresholds for UFP, with implications for public health. **The Proponent should include this study and its final results in a Supplemental DEIR so that a baseline of current air quality can be established. The Proponent should also address the Project's further contributions to UFP concentrations, regardless of whether this is mandatory, as yet, under EPA.**

- The Project site has **PFAS Superfund contamination**, and the DEIR is missing detailed plans to coordinate with the US Air Force and EPA about remediation of PFAS superfund contamination areas at the Project site. **The Proponent should provide information from the US Air Force's phase 1 Action Plan** re: the PFAS contamination clean-up in a Supplemental DEIR, and should also include risks to public drinking water supplies in the area, as well as a thorough review of the impacts of planned pervious surfaces in this area which may contribute to the spreading of contaminated plumes in underground water. **The Supplemental Report should also include detailed maps** that superimpose Air Force maps that identify contaminated areas onto The Proponent's maps to accurately reflect where facilities will be located and their precise impacts on remediation plans for the contaminated.

- **Noise and air emission impacts from the Project are dismissed categorically** because of the assumed and unsubstantiated decrease in ferry flights: "The Project is expected to result in…reduced associated air emissions, including GHG emissions, and no significant change in noise." (Section 1.5.1, p. 1-9)

  A body of evidence now exists demonstrating the link between **noise and numerous public health issues**. The Proponent minimizes the Project's impacts on both noise and air emissions. The Proponent should 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.

- Hanscom is the only airport in the country that abuts both a national park and a national wildlife refuge (Great Meadows).

  On May 1st -- owing to the expected impacts from this private jet hangar expansion -- the National Trust for Historic Preservation designated Minute Man Park, Walden Woods and Nearby Landmarks as one of America's 11 Most Endangered Historic Places, **thus bringing attention to the adverse impacts of this Project on our national historic and natural resources for which the most effective mitigation measure would be a No Build Alternative.**