

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

June 3, 2024

Re: Draft Environmental Impact Report 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.

As advisory body to the Bedford Select Board in matters related to sustainability and greenhouse gas (GHG) emissions in town, Bedford's Energy and Sustainability Committee is writing to express our concern over the negative environmental impacts of the proposed Hanscom Field North Airfield Development Project.

- 1. This project will increase flight activity at Hanscom Field, including ferry flights.** Section 2.3 of the DEIR claims that the project is "unlikely to impact the current and future levels of aircraft activity at Hanscom" primarily through the reduction in so-called "ferry flights". Although this term is defined by the report and many comments and questions are raised on the topic the answers are consistent in noting an expectation of capturing significant reductions in this type of flight operation with a credit applied to this "build condition". However, many caveats such as "may occur" and that Massport and the proponent do not have any ability to control ferry flights are used in the course of explaining the topic. The proponent repeatedly uses the language "the ability to decrease the number of ferry flights is beyond the Project's control" to answer a wide variety of questions attempting to better understand how the conclusions as to the reduction in ferry flights are determined. Given the dubious nature of fully understanding these types of flights or the ability to control ferry flights, such supposed future reductions should not be used in the analysis. Ferry flights are defined as flights that pick up or drop off passengers that operate empty to the pick up or after the drop off passengers from an "off-site" plane storage location to or from Hanscom. An entire category of ferry flights are not included in this definition or the proponent's subsequent analysis. Given the project's acknowledged dramatic increase in plane storage capacity at Hanscom their project impact analysis should include flights that operate empty in or out of Hanscom where Hanscom is the "off-site" airport. For example, it is easy to envision a significant increase in ferry flights to and from Logan where Hanscom is the "off-site" location given the increased plane storage capacity at Hanscom in the context of the very tight plane storage space at Logan. Included in many sections of this report is the phrase that Hanscom is a general aviation "reliever to Logan". Given this fact it seems only natural to analyze the scenario where Hanscom is a reliever to Logan in the context of providing added general aviation storage capacity for Logan.

2. **The main impact of the increased flights is an increase in air pollution and GHG emissions.** Private jets emit 5-14 times more carbon emissions per seat compared to commercial planes<sup>1</sup>, typically carry only 1 to 5 passengers<sup>2</sup>, and are considered one of the most polluting and carbon emitting forms of transportation existing today. As stated in the DEIR sections 4.2.4.2 and 8.3.3, concentrations of particulate matter of different sizes (PM2.5, PM10) are expected to increase, both linked to respiratory and cardiovascular health outcomes like asthma and stroke. Although not modeled in the DEIR report, ultrafine particles (UFP) and polycyclic aromatic hydrocarbons (PAHs) would also be expected to increase. UFP are particles more toxic than PM2.5 and PM10 because of their small size, and PAHs are well-known carcinogens. These increased emissions will impact local and regional populations. Hanscom Field is currently the busiest private jet airport in New England, reporting 36,808 civilian jet operations in 2022<sup>3</sup>, and generating over 600,000 tons of CO2 each year<sup>4</sup>. The proposed expansion of 17 new hangars which can each house 8-9 jet planes will triple the current capacity.
3. **The impacts of this expansion on local and regional public health will be significant.** At a local level, the air pollution generated from burning fossil fuels during lift off and landing operations would negatively impact the health of local Bedford residents the most. Air pollution is linked to negative health impacts such as high blood pressure, heart disease, and asthma, particularly for vulnerable populations such as older adults and children. Section 4.2.4.2 of the DEIR admits to an increase in the amount of smaller particulate pollution even under the dubious assumption that this project will reduce the number of flights. The negative health impacts of particulates smaller than 10 micrometers is well established<sup>5</sup>. In addition, recent research shows that airports are a source of ultrafine particulate air pollution<sup>6</sup> and the presence of ultrafine particulate air pollution has negative impacts on human health<sup>7</sup>.
4. **Supporting the airport expansion would be a direct opposition to the town goals and Massachusetts state law of reducing emissions to NetZero by 2050.** At a state level, Bedford and all towns and cities are working to reduce their carbon emissions in response to the Massachusetts state law requiring NetZero emissions by 2050. Bedford and surrounding towns have made great strides by electrifying town buildings, increasing electric charging stations for vehicles, and promoting clean energy sources through its community choice aggregation program. The proposer's stance that they are responsible only for the GHG emissions from the buildings to be constructed may be technically correct, but the GHG emissions from the resulting increase in flight activity cannot be ignored when considering the environmental impacts of the proposal.

Bedford's Energy and Sustainability Committee urges you to consider the negative environmental and health impacts of the proposed North Airfield Development at Hanscom Field. We urge you to require the proposer to accurately assess and describe the effects that the project will have on the residents in the immediate surrounding area of Hanscom Field as well as the Commonwealth's climate goals. This project will be harmful to both.

Sincerely,

Daniel Bostwick

Chair, Bedford's Energy and Sustainability Committee

## References

1. Transport & Environment (2021). Private jets: can the super rich supercharge zero-emission aviation?  
[https://www.transportenvironment.org/wp-content/uploads/2021/05/202209\\_private\\_jets\\_FINAL\\_with\\_addendum.pdf](https://www.transportenvironment.org/wp-content/uploads/2021/05/202209_private_jets_FINAL_with_addendum.pdf)
2. Salas EB (2022) "Number of passengers per private jet flights 2016-2019," *Statista*,  
<https://www.statista.com/statistics/1171518/private-jet-per-flight/>
3. Mass Port Authority (2023) The State of Hanscom 2022  
<https://www.massport.com/media/bmxfojij/2022-state-of-hanscom.pdf>
4. Save our Heritage (2023). Calculations of climate effects from private luxury jets at Hanscom Field  
<https://saveourheritage.com/calculations.htm>
5. <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>
6. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8318113/>
7. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7156741/>