

RE: Proposed North Airfield Development at Hanscom Field

OVERVIEW

If carried out, the proposed development will undermine our town, state, and national Climate goals at a time when climate scientists are urging us to accelerate these goals.¹

The proposed development would:

- add 495,470 sf of hangar space for 27 private jet hangars on 49 acres (*c.2-3 jets/hangar*)
- triple the private jet hangar capacity at Hanscom
- impact 35 Environmental Justice populations within a 5-mile radius
- add over 36 acres of impervious paving
- clearcut mature trees (*Mature trees are already the most efficient CO2 sequestration technology²*)
- represent the largest single development in Hanscom's history

This would be in addition to current new expansion activity *at all three existing FBOs* at Hanscom. [*FBO – Fixed Base Operator, i.e., a fuel and service station for private jets] The proposed facility would essentially be a fourth FBO. FBOs attract private jet traffic to airports.

Climate impacts

The proposed development demonstrates inexcusable disregard for our current Climate Crisis. The 27 proposed new hangars promote private luxury and business jet use. With typically 4-5 passengers per flight³, private jets are considered to be the most egregious form of travel per capita for their carbon footprint.

To put the magnitude of the proposal in context:

- A typical passenger car generates about 4.6 metric tons of CO2 per year⁴
- Public transportation reduces CO2 emissions by 45%, compared with driving alone in a car.⁵
- **Private jets generate 7,500 tons of CO2 per person/user per year.⁶**
- In 2022, there were 36,808 daytime jet operations at Hanscom. (*State of Hanscom 2022 Report*)

¹ Brad Plumer, "A dire warning from the UN on climate," *Boston Globe and New York Times*, 3/21/23

² Beverly Law and William Moomaw, "Curb Climate Change the Easy Way: Don't Cut Down Big Trees," 4/6/21, <https://now.tufts.edu/2021/04/06/curb-climate-change-easy-way-dont-cut-down-big-trees>

³ Erick Burgueno Salas, "Number of passengers per private jet flights 2016-2019," *Statista*, April 13, 2022, at <https://www.statista.com/statistics/1171518/private-jet-per-flight/>.

⁴ EPA, "Greenhouse Gas Emissions from a Typical Passenger Vehicle," <https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle>

⁵ Andy Pei, UCLA Transportation, "5 Environmental Benefits of Sustainable Transportation," 10/7/21, <https://transportation.ucla.edu/blog/5-environmental-benefits-sustainable-transportation>

⁶ Gossling and Humpe, "The global scale, distribution and growth of aviation: Implications for climate change," *Global Environmental Change* (2020) at 9. See <https://www.sciencedirect.com/science/article/pii/S0959378020307779>.

Environmental Justice populations impacted

Hanscom Field civil airport is located in the four towns of Bedford, Concord, Lexington and Lincoln. The proposed project would be sited entirely in Bedford. In the 2/24/23 DEIR Scope, EEA Secretary Rebecca Tepper referenced 35 Environmental Justice populations within a five-mile radius of the project site located in Billerica, Burlington, Lexington, and Waltham, with directives to the developers for comprehensive outreach.

Other Impacts

- adverse impacts on national resources: Minute Man Park, Walden Pond and Woods, and Great Meadows Wildlife Refuge
- increased noise, air, water and soil pollution on public health and natural surroundings
- PFAS superfund sites on Runway Realty Ventures' parcel and water contamination
- adverse impacts on wildlife, mature trees, and water ways
- land alteration and resulting impacts on biodiversity and on natural carbon sequestration

Developers' rationale for private jet hangar expansion: It's environmentally beneficial.

Defying common sense and logic, the ENF's primary rationale for the proposed expansion of private jet hangar space is that it would be environmentally beneficial, for two reasons:

1) Reduced ferry flights: According to the developers, flights that fly in and out of Hanscom empty, because there aren't enough hangars for overnight jet storage, would be reduced by the proposed expansion because the new hangars would reduce the need for the first and last flight of the day. This assertion is offered with no supportive evidence. Moreover, the "reduced ferry flight" rationale rings hollow to veteran Hanscom observers who have heard it applied before to previous development proposals, only to watch operations increase with each expansion. The EEA Secretary's DEIR Scope suggests that instead of constructing hangars, perhaps the ferry flight problem could be solved operationally through ride-sharing and/or shuttle bus service.

To make the case that the 27 proposed private jet hangars are intended for current – not future - demand, Massport states that there are already 30 "ferry flight" operators on their waiting list. This would imply that, roughly speaking, a single private jet would occupy each hangar, a highly unlikely scenario. With a conservative estimate of 2-3 private jets per hangar, the proposed development would attract and house between 54 and 81 private jets, leaving plenty of hangar space for future demand, and increased private jet operations.

2) Green infrastructure: The developers would have us believe that because they are thinking about constructing LEED Gold certified buildings, installing solar panels on hangar roofs, providing charging stations for electric cars (on parking lots that are currently woodlands and open space), and planning for storm runoffs, their proposal is environmentally-friendly because it would support Massport's commitment to achieve net-zero by 2031. **It should be noted that Massport net-zero goals are solely focused on emissions from ground facilities, and do not take into account aircraft GHG emissions.** (Source: Massport website)

While the above energy-saving and carbon-reducing features for infrastructure are commendable under normal circumstances, their gains would be negligible compared to the magnitude of the intense GHG output from the private jets they are intended to support.

The Moving Parts: The Properties, the Players, the Land Swap, the Lease

The proposed development would be sited in Bedford MA on two adjacent properties (Massport land and privately owned land), and hence, involves two property owners. There are overlapping connections between Massport's developer, the company that owns the private property, and the Silicon Valley Bank Financial Group. The proposed project also involves a land swap between Massport and the private property owner, as well as a lease between them. For specifics, see section on *The Moving Parts*.

Concluding Remarks

This immense expansion project has the potential to single-handedly undercut the total combined GHG reductions that Massachusetts and our towns are working diligently to achieve. For this reason alone, it should not be allowed to go forward at Hanscom--*or at any other airport*.

On 3/20/23, IPCC climate scientists urgently warned us that:

*"Earth is likely to cross a critical threshold for global warming within the next decade, and nations will need to make an immediate and drastic shift away from fossil fuels to prevent the planet from overheating dangerously."*¹

The conventional argument that private jets are necessary for CEOs to do business and to boost the economy no longer holds. In light of the March 2023 IPCC report, the adverse impacts of the proposed private jet hangar expansion cannot be justified.

We must put a stop to this proposed development and send a message to Massport, and to all airport owners, that as the Climate Crisis intensifies, we cannot tolerate or allow the unbridled expansion of super-emitting private jet use *at any airport*, including Hanscom.

See also:

- The Moving Parts: The Properties, Players, Land Swap & More
- Key Documents & Meetings re: proposed development (with links)
- List of Government & Organizational Public Comments on proposed development

Facts about Hanscom Field:

- Hanscom Field vs Hanscom Air Force Base:
Though they share the same name and a history, and they abut each other, Hanscom Field and Hanscom Air Force Base (HAFB) are separate and distinct. Hanscom Field is a General Aviation (GA) airport owned by Massport. Hanscom Air Force Base has no aviation activity or runway. AF active flying ended in September, 1973. Occasional military flights use Massport's runway at the civil airport.
- Hanscom is the largest general aviation (GA) airport in New England, and a reliever for Logan Airport.
- Hanscom is the busiest private jet airport in New England.
- Hanscom was the 20th busiest private jet airport in the nation in 2021.
- Massport owns Logan and Worcester Airports, in addition to Hanscom Field,
- Massport pays no property taxes to its four Hanscom-host towns:
Bedford, Concord, Lexington and Lincoln
- There are no taxes on private business and luxury jets, or their parts or upgrades.

