

Environmental Subcommittee

of the Hanscom Area Towns Committee

Town of Lexington, 1625 Massachusetts Avenue, Lexington, MA 02420

November 27, 2001

The Honorable Bob Durand, Secretary
Executive Office of Environmental Affairs
Attn.: MEPA Office
Environmental Analyst: William T. Gage
EOEA No. 5484/8696
251 Causeway Street, Suite 900
Boston, MA 02114

Re: EOEA No. 5484/8696, L.G. Hanscom Field, Bedford, MA
Environmental Status & Planning Report, Aug. 2001

Dear Secretary Durand:

The Environmental Subcommittee (ESC) of the Hanscom Area Towns Committee (HATS) has reviewed the Proposed Scope of the 2000 ESPR for L.G. Hanscom Field) for Laurence G. Hanscom Field (Hanscom Airport) submitted by Massachusetts Port Authority (Massport) on 16 July 2001. We also took into account the presentations made by Massport explaining and expanding the proposed Scope.

We are submitting herewith our comments, which are quite extensive, partly because the Massport document had many deficiencies and omissions, and partly because we have received many comments from members of the affected communities. We actually think there may be an advantage to a comprehensive document rather than multiple short documents.

As you can imagine considerable effort by many citizens and experts in different areas went into creating these document. We thank you in advance for giving them your careful attention.

Also attached is a newly updated revision (Revision 3) of a document previously presented to your staff that lists actions Massport ought to take at the outset of the ESPR process. The final attachment is a November 16 letter we received from Greater Boston Chapter, Trout Unlimited, relating to Shawsheen River Wetlands, which is applicable to the ESPR.

Please do not hesitate to contact either of us if you require additional or clarifying information.

Sincerely,

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Co-chairs of the Environmental Subcommittee of HATS

c/c HATS Selectmen
HATS ES
Massport, Attn: T. Ennis,
Members of the Congressional Delegation
State Officials
& others listed in the MEPA Reviewer's List

**Environmental Subcommittee
of the Hanscom Area Towns Committee**

Town of Lexington, 1625 Massachusetts Avenue, Lexington, MA 02420

November 27, 2001

**Comments by the HATS Environmental Subcommittee
on
The L. G. Hanscom Field 2000 Environmental Status & Planning Report (ESPR) SCOPE
EOEA No. 5484/8696**

* * *

The Hanscom Area Towns (HATS) Committee was formed under the provisions of M.G.L. Ch. 40 §4(I) to address intergovernmental and mutual planning of growth and development issues concerning the Towns of Bedford, Concord, Lexington, and Lincoln. The purposes of HATS include growth and development issues relating to Hanscom Field and its environs, and to comment on and review Massport's proposals which may have a significant impact upon the health, safety or welfare of citizens of more than one member municipality.

The Environmental Subcommittee of of HATS (HATS ES) was established by HATS, in part, to examine the specific environmental impacts of such growth and development plans and to make detailed comments and assessments.

Massport's Proposed Scope of July 16, 2001 fails to specifically address several significant issues identified by the Secretary in the 1995 GEIR Update Certificate and issues of importance to the communities. This document lists the HATS ES comments and recommendations. The HATS ES provided preliminary comments to MEPA and Massport earlier in the process.

1 COMPLIANCE WITH 1995 GEIR CERTIFICATE & Draft SECTION 61 FINDINGS

1.1 >> Massport should detail point-by-point, and provide at the outset of the ESPR process, by a specific due date, all the information promised by them and requested and specified by the Secretary in the 1995 GEIR Update Certificate and subsequent Draft Section 61 Findings.

The attached "LIST OF ACTIONS (Rev. 3), REQUIRED OF MASSPORT BEFORE THE 2000 ESPR BEGINS" (prepared by the HATS ES Nov. 27, 2001) provides many examples of what was required of Massport by the Secretary after the 1995 GEIR. The Draft ESPR Scope should be amended to follow in all respects the instructions of EOEA in the certificates for the 1995 GEIR and its Section 61 Findings, and to also take the previous GEIR comments into account.

2 ENVIRONMENTAL SAFETY

2.1 >> The ESPR should deal with environmental safety issues. Potential terrorist activities or accidental occurrences that could cause environmental damage such as public water supply contamination or air pollution, or fire, or other environmental degradation needs to be addressed. Preparedness for containing impacts should be reviewed and preventive measures discussed.

Environmental safety is a key objective of the MEPA regulation. In order to comply with the regulation and recognize the tragic events of Sept. 11, 2001, the Scope should include a section devoted to a review of preventive measures needed to minimize potential impact of unauthorized activities at the airport and in the air to natural resources such as water supplies, wooded areas, and to cultural and historical resources.

- 2.2 **>> *The ESPR should deal fully with the potential damage to the environment from some of the actions proposed by Massport and imprudent growth of the activities at Hanscom Airport. Excessive development of the facilities should not be allowed.***

Massachusetts General Law, M.G.L. 12, Sec. 11 D makes it clear that "damage to the environment" shall mean any destruction, damage or impairment, actual or probable, to any of the natural resources in the Commonwealth and shall include, but shall not be limited to, air pollution, water pollution, improper sewage disposal, pesticide pollution, excessive noise, improper operation of dumping grounds, or the impairment or eutrophication of rivers, streams, flood plains, lakes, ponds or other surface or subsurface water resources, destruction of seashores, dunes, marine resources, underwater archaeological resources, wetlands, open spaces, natural areas, parks or historic districts or sites.

3 PERIODIC MONITORING & ENFORCEMENT

- 3.1 **>> *The Scope should require a clear description of procedures being instituted to monitor and periodically report changes at the airport, effectiveness of mitigation measures, and how the commitments made in the prior GEIRs and in this ESPR will be enforced.***

By way of example, reports of the traffic counts at the key intersections and air quality data should be submitted annually so that the effectiveness, or any lack thereof, of Transportation Demand Management can be monitored. Initiatives to bolster the agricultural use of land should be reported annually to the Department of Agriculture. Similarly, reports should be made to other appropriate agencies. It would be a mistake to wait 5 years for a report as to what is actually happening. Experience has shown that unless periodic monitoring is explicitly specified, it will not happen.

Massport can help by suggesting in the ESPR what periodic measurement of change or reports they can provide. "The State of Hanscom" report that Massport presents annually to HFAC is more of a promotional document about economic benefits of Hanscom as perceived by Massport. It contains some aircraft activity data, and references the annual noise report, but does not provide any other factual data for environmental impacts assessment, and thus is not an environmental monitoring submittal.

In the past, mitigation measures have been promised quite readily, but there is no record how effective they have been. Mitigation measures that have been instituted should be enumerated and the results of each such measure should be reported.

4 BASELINE YEAR

- 4.1 **>> *Baseline year to which airport environmental impacts are compared should be 1985 and not 1995.***

The environmental review process began at Hansom Field with the issuance of the "Hanscom Field Master Plan and Environmental Impact Statement" issued by Massport and accepted by the Secretary of Environmental Affairs. The formal GEIR process began in 1985, so this is the year that makes a logical baseline date. Comparing impacts to a sliding baseline, always moving close to today's date, tends to obscure what is really happening. In many cases, true impacts are more closely related to cumulative changes over time, while in other cases, they can also be linked to

incremental changes over short periods. Furthermore, it distorts the analysis to go back just 5 years, but 15 forward. Historical data is often the best source of information for estimating the potential effectiveness of similar measures proposed for the future. Accordingly both incremental as well as cumulative changes, along with and referenced to the 1985 baseline levels, should be reported.

5 ACTIVITY LEVEL FORECAST

5.1 >> *Forecast projections should not go beyond 2010 (10 years from the year 2000) and should preferably not go beyond five years*

In the past, Massport has excused overly accelerated growth by saying it did not exceed their forward projections. This technique of using a 15-year projection to argue that the effects have already been studied deprives the EOE and the communities of an opportunity to evaluate impacts as the growth occurs, and is therefore inconsistent with the intent of the regulation. Projections should be for the expected period between successive ESPRs. Moreover, aviation activity predictions have proven to be singularly inaccurate. The events of September 11 have magnified the uncertainties of factors that need to be accounted for in order to make informed aviation forecasts.

5.2 >> *In the year 2000, growth models should not exceed 0 %, 0.8 % and 2.0 % and retraction models should be introduced in the event that activity levels decrease.*

In Section 8.1 below, we discuss the need to review the limitations of Hanscom Field and the growth that has occurred. Such growth reduces the capacity for Hanscom Field operations to expand. Previous Hanscom growth models were 0 %, 1 % and 3 % to match what Massport studied at Logan Airport. Because the two airports have different missions, it is inappropriate to apply the 1% and 3% models.

5.3 >> *Massport's 5-year Business Plan must be included if any growth scenarios are presented.*

As a public instrumentality, it behooves Massport to lay out its 5-year Business Plan. We presume that such plans are presented when Massport seeks public financing, and they should be presented both to the Secretary for his proper evaluation of the ESPR, to HATS (which was established under state law), and to the surrounding communities. In the May 17, 1996 GEIR Scope Certificate (p. 6), the Secretary asked Massport to "disclose its actual business plans for the next five years." Massport failed to do so. We now respectfully request that the Secretary reinforce this directive in the 2001 Scope Certificate. Such a Plan would enable the Secretary and the public to place environmental impacts of the normal growth in proper perspective, but would not be automatically endorsed by either the Secretary or the public through the ESPR process.

5.4 >> *Methods to control "time-share" jet activity should be outlined.*

Time-share jets are not truly "general aviation." They are a hybrid between commercial aviation and private ownership. They are often managed by third parties (not the owners), and accommodate many passengers and travelers from multiple companies. They generate more use, create more operations, and spend more time in the air than regular business jets. The FAA is currently reviewing their appropriate classification and rules. Massport should provide a complete description of this phenomenon and its impact on Hanscom and the prospects of controlling it.

5.5 >> *The ESPR Scope should mandate more discussion of the unequal nature of a "flight operation", how equivalencies can be introduced to obtain a more accurate picture, and a presentation of model "flight operation equivalencies" based upon Hanscom actual and projected total operations.*

Some flight operations are by small single engine aircraft; others are by big jets and turbo-jets. Some are "touch-and-go" and some are fully loaded loud takeoff, or very long approach low landing. Some are Stage 2 and some Stage 3. They all generate considerably different impacts. When the 1978 Master Plan was prepared, most operations were by small aircraft. In the last few years, the composition of the fleet has dramatically changed. Suppose one jet creates as much noise as 10 small props. Then, if the small prop is treated as a unit, the jet is 10 units. Using this approach a more accurate measure of impacts could be developed. Talking about flight operations as all equal simple numbers is misleading. Massport should provide a qualitative and a quantitative description of the impacts and equivalencies of flight operations.

6 AIRPORT PLANNING & HISTORY

- 6.1 **>> *The ESPR should be required to include the latest executed Airport Layout Plan (ALP), the history of which categories of aircraft are being accommodated on each runway and the comparison of protection zones in 1985 and now. Massport should also list the history of runway designations, waivers granted by FAA, and all dimensional surfaces specified by FAA regulations. Outstanding requests by Massport to FAA for revisions to the ALP and for waivers should be presented. If any studied scenario would require additional revisions to the ALP, they should be explicitly noted.***

The 1995 GEIR did not contain the copy of a duly executed ALP. We were told by the officials of the FAA, that a plan that is not duly executed cannot be regarded as a copy of the official ALP. Moreover, the ALP is not by itself an adequate description of the airport facility; the waivers granted to it should also be described, both as applicable to the baseline and to the current status.

In order to provide a full picture of the environmental impacts, the description should include a discussion of the protection zones and obstacle surfaces, and compare those in effect now to those in effect at the date of the baseline.

Frequency of operations should be subdivided into categories of aircraft, separately for each runway.

- 6.2 **>> *Massport should be directed to limit discussion in the ESPR to plans and activities that are consistent with (and do not exceed the limits within) the 1978 Hanscom Field Master Plan.***

The Master Plan sets the policy by which Massport operates Hanscom Field. Hanscom is classified by the FAA as a general aviation reliever airport; an airport that "allows a larger nearby airport to concentrate on large passenger and cargo aircraft" (1995 GEIR, p. 1-9).

- 6.3 **>> *An explanation of the need for any planned facility changes should be provided. The intended method of funding, the potential alternatives to it, and the attached conditions should be disclosed.***

Some funding carry conditions that then control the use of the airport. Unless these conditions are identified, and the impact of their constraints is discussed and documented in the ESPR, the picture of what may happen is not complete. Procedures for reporting applications for Hanscom-related FAA funds, certification and airport layout changes, or for new or expanded activities at the airport should be specified.

- 6.4 **>> *Parking areas should be enumerated and changes from the 1995 GEIR and 1988 GEIR explained.***

The 1995 GEIR (p. 2-14) listed 435 parking spaces for the Civil Air Terminal (CAT). In 2001 Massport declared it would be using approx. 800 spaces for the CAT building. Such an increase, coupled with the increased vehicular traffic to the CAT building should have triggered a mandatory ENF. Massport explained that other users of the parking spaces developed their own parking

spaces elsewhere, and therefore no changes in the paved surface in the Civil Air terminal parking lot have occurred. Such an explanation amounts to a subterfuge flying in the face of the anti-segmentation provisions of the MEPA regulations. The 2000 ESPR should provide full explanation of what happened, not just at CAT, but also at the other locations.

7 ENF/ENR/LIMITING MEASURES

- 7.1 >> ***The Scope should specify that Massport will file any proposed infrastructure changes for a MEPA review to the extent required by the MEPA regulations. The filing should take place when the planning begins, so that ENF can be filed at least a year in advance, as required by the regulations. The discussion of such changes in the ESPR should not eliminate the need for an EIR.***

Public comments on the ESPR are treated quite differently from public comments on an EIR, the reason being that one is a review and planning activity, and the other an activity for a specific project. Moreover, general future planning does not permit a full review of actual impacts, and whether the additional impacts are acceptable.

- 7.2 >> ***Massport should be required to describe and commit to specific strategies and actions that demonstrate it intends to be proactive in keeping Hanscom Field operations within the bounds of established restrictions. Methods of limiting activity and impacts should be discussed and Massport should present plans for containing the growth of jet traffic at Hanscom.***

Massport cannot be viewed as a passive agent that simply observes the unwarranted growth of all kinds of aircraft activity. Not all aircraft activity is equal in its environmental effects. The Scope should include a detailed discussion of measures Massport can take to limit the growth of a particular kind of activity; e.g., landing fees may be charged as determined by the size of the aircraft, or its approach noise. Other mechanisms may be takeoff fees, automobile parking fees, increased cost of renting large hangar, etc. Large jets have been particularly offensive and their activity has grown rapidly at Hanscom. The number of jet operations increased at Hanscom from 11,248 in 1997 to 20,242 in the year 2000, or 80% in three years. A mechanism to limit such growth needs to be described.

8 REGIONAL TRANSPORTATION

- 8.1 >> **The Scope should require detailing the limitations of Hanscom Field.**

It is essential that the Scope require Massport to describe the limitations of Hanscom Field as a "General Aviation Airport" that make it unsuitable as a "Regional Airport." Hanscom is unusually close to Logan, a major hub airport; few airports in the country are located that close to each other. The airspace over Hanscom is largely controlled by the Logan air traffic. The airspace over Hanscom is limited for safety reasons, so as not to endanger the flights from Logan. Only one Hanscom runway can be used under the Instrument Flight Rules (IFR). Commercial passengers, who miss flights, are stranded, because only few commercial flights are practical. There is no capability to change to flights to other destinations.

In addition, under the original agreements with the US Air Force, Hanscom has to remain available to military air traffic; this is particularly relevant at the time of national crisis. Military air traffic might take precedence over commercial and general aviation air traffic. The agreements with the Air Force should be explained.

Hanscom has been the second busiest airport (after Logan) in New England. The introduction of commercial flights in larger aircraft and of big business jets unnecessarily raises complexities for pilots. Controlling the landings and takeoffs both from the Logan Tower and the Hanscom Tower,

with different approach patterns and speeds, let alone monitoring the complex, different holding patterns, for diverse aircraft at the two closely situated airports creates a serious burden for the traffic controllers. These burdens imposed on a regular basis can lead to mistakes and even accidents. They also can provide an inadvertent advantage to malicious parties.

- 8.2 >> **Massport should not be allowed to include any “certificated air carrier operations.” in its future scenarios because the “emergency” conditions that had to exist for Massport to implement “certificated air carrier operations” in violation of its own 1978 Master Plan (p. 15) and which were not addressed in the 1995 GEIR. Massport should be required to explain the nature of “emergency” conditions if they expect them to exist in the future.**

Massport has dramatically changed the dynamics of Hanscom’s role within the region by applying for full certificated air carrier operations. Massport conducted the last GEIR under the pretense that it would not violate its Plan and its Policy of “certificated passenger air carrier operations will not be allowed at Hanscom Field, except in an emergency”. Massport needs to account for this change and to address whether an emergency condition exists. Massport needs to identify, in detail, such “emergency” conditions.

- 8.3 >> **Massport should be required to identify the relationships of Hanscom’s role within the Greater Boston Regional Airport System including T.F. Green, Manchester, Worcester, and the local airports in the region. Effects of recent changes in the regional road, rail, and air transportation scene, as a result of the events of September, should be addressed by including data gathered after September 2001.**

Hanscom Field is one part of a broader airport system. Since the 1995 GEIR Massport has acquired control of Worcester Airport and has begun planning for its increased use. Moreover, T.F. Green and Manchester Airports have provided more relief to Logan. AMTRAK services have expanded, and plans are underway for track improvements to speed up the trains.

- 8.4 >> **Massport’s plans for ground transportation from the Metropolitan Boston area to T.F. Green, Manchester and Worcester should be outlined, as meaningful alternatives to Logan. Alternative ground transportation between major metropolitan areas should be enumerated. Cooperative plans developed jointly with AMTRAK for smooth transfer of passengers and luggage between airport and trains should be presented. Effects of recent changes in the regional transportation scene, as a result of the events of September, should be addressed by including data gathered after September 2001.**

Since the 1995 GEIR Massport has acquired control of Worcester Airport and has begun planning for its increased use. Moreover, T.F. Green and Manchester Airports have provided more relief to Logan. AMTRAK services have expanded, and plans are underway for track improvements to speed up the trains. Ground transportation should include bus, rail, and automobile traffic. There has been a temptation to exaggerate the potential of Hanscom. The ESPR should be developed for its intended purpose.

- 8.5 >> **Growth scenarios should eliminate the discussion of cargo operations.**

The 1995 GEIR states (p. 1-9): " Hanscom Field has no dedicated cargo operations now, and none are foreseen." Massport representatives have repeatedly assured HFAC that no cargo operations are about to be introduced at Hanscom. The concept of cargo operations at Hanscom is so radical that, if it is to be considered, it should not be introduced through the "back door" of an ESPR process. In the ESPR process, the MEPA Office mainly observes whether Massport has provided factual environmental data. The ESPR process should not be used by Massport to justify radical departures from established policy as to airport uses.

- 8.6 >> **The Scope should require that Massport describe its participation in regional transportation planning efforts since the last GEIR, what may planned for the future in this**

respect, and what opportunities to participate will be offered to the local communities and officials such as HATS and HFAC.

The Scope certificate for 1995 GEIR stressed the issue of regional planning. An explanation is needed how Massport intends to address this issue. To date local communities have not heard from Massport when such process will begin.

9 NATIONAL PARK/HISTORIC/CULTURAL

- 9.1 >> ***Plans to contain growth of airport operations, commercial aviation ground traffic, and aviation noise in order to protect the Minute Man National Historical Park (MMNHP) should be outlined. Changes in measured noise impacts on sensitive sites in the area should be listed and plans for mitigation spelled out. Studies to evaluate the effects of the Airport's impacts on the historical and cultural resources within the region should be conducted.***

The prior GEIR Certificates were clear in directing Massport to pay special attention to the impacts of the airport on the MMNHP. The ESPR should compare mitigation measures used over other national parks, such as Grand Canyon, Haleakala Crater (Maui) and Mount Rushmore, to those used at Hanscom.

- 9.2 >> ***Historical, archaeological, natural, and cultural resources in the surrounding area should be described, along with the specific impacts of the airport and its activities on them.***

The entire area surrounding the airport is of prime national significance, because of numerous activities that have occurred. It was the place where the American Revolution began, giving birth to the United States. The airport was located here during World War 2, under emergency conditions. It may now serve as a reliever airport for light general aviation and training schools, but was never intended as a major hub for commercial traffic or heavy jets. Walden Pond State Reservation, Great Meadows Wildlife Refuge, the Battle Road, historical homes and buildings constitute only a small portion of the national treasure requiring maximum protection.

- 9.3 >> ***Massport should be required to fully consult with the Massachusetts Historical Commission, the National Park Service, the U. S. Fish & Wildlife, and other related organizations in the formulation of at least this portion of the ESPR and Massport should commit to conduct necessary studies to allow Agencies to provide informed comment on the ESPR.***

The Massachusetts Historical Commission provided thoughtful comments and requests to Massport on its current Vegetation Management Plan Draft several months ago. Massport failed to provide the requested information, which left the Commission to respond before a Massport imposed deadline without data to make a truly informed comment. Similarly, the National Park Service has not been consulted on specific issues despite the Secretary of Environmental Affairs written requests.

- 9.4 >> ***The ESPR should explain whether Massport donated the 50 acres south of the airport to the Park, as recommended by the General Management Plan (GMP), and if not, why not.***

The 1995 GEIR (p. 2-203) cites this recommendation. Did Massport act on it?

10 UPDATE ON THE ENVIRONMENTAL SETTING

- 10.1 >> ***The ESPR should present updated information on the environmental setting around the airport.***

The ESPR should describe geography, topography, geology, soils, vegetation and climate (including wind conditions), as well as surface water, groundwater hydrology and resources, agricultural land uses, and conservation land protection. Plans identifying the resource areas should be presented.

Potential impacts on the Cambridge Reservoir, Lincoln's reservoir, the Shawsheen River, and Bedford water wells should be detailed.

- 10.2 >> ***The Vegetation Management Plan (VMP) and its relation to the ESPR should be required. The VMP should be outlined and compared to prior such activities. Implementation of any vegetation management should be required to be included in the ESPR. The yearly (2001 and 2002) VMP Annual Reports that address the Hanscom VMP activities should be required to be included in an appendix to the ESPR.***

A recently filed Draft VMP (Aug. 2001) had many gaps in its presentation. Comments submitted by various public bodies and citizens identify these gaps and have objected to the major environmental changes being introduced under the guise of a "limited project." The Secretary has been asked to intervene. To the extent necessary, if the Secretary chooses not to fully intervene, the ESPR should complement the picture. It is essential that the current VMP proposals are compared to the prior such activity.

The comments in the State of Hanscom Report (March, 2001, p. 9) that additional burning may be planned, and in the Draft VMP that herbicides and mechanical grubbing are to be extensively used, are very disturbing.

- 10.3 >> ***Specific plans to take measures compensating for Vegetation Management actions should be outlined.***

The Draft VMP outlines a drastic and dramatic approach to "clear and grub," burn, treat with herbicides, and for all practical purposes, deforest, a total area amounting to 1,000 acres, as compared to less than 100 acres in the past. Massport should be required to revisit this plan, so as to cause much less environmental damage. Specific plans to compensate for such extensive damage should be outlined and committed to.

- 10.4 >> ***Alternatives to extensive Vegetation Management actions, including reducing runway lengths, should be analyzed.***

The draft VMP outlines dramatic actions that amount to the deforestation of up to 1,000 acres. But, there is another general strategy for insuring that aviation safety requirements are met: shortening runways. Massport should be required to present the alternative of displacing runway thresholds in lieu of taking trees as a means of achieving FAA mandated safety requirements. If other potential solutions are possible, such as changes to approach patterns or glide slopes, these should be analyzed as well.

- 10.5 >> ***Specific plans for preserving the farming areas should be included.***

The Department of Agriculture in its letter of 26 October 2001 pointed out that Massport has not consulted with it regarding a plan to maintain or relocate agricultural uses, where feasible, located on Massport owned land which is currently so utilized." To the Department's knowledge, Massport prepared no such plan, contrary to the Secretary's 30 June 1997 Certificate.

11 LOCAL PLANNING

- 11.1 >> ***The ESPR must address Massport's interaction and consistency with local planning efforts (MHD, Planning Boards and 4-Town Planning Committee) and with the prior commitments.***

This requirement is given in the June 30, 1997 GEIR Update Certificate (p. 4).

As the Secretary stated, any Massport proposals should have been, and "should be consistent with any previously made commitments."

11.2 >> *The ESPR should include and explain all of Massport's required filings under Executive Order 385.*

In the June 30, 1997 GEIR Update Certificate (p. 4), the Secretary refers to the mandate of Executive Order 385. It is not clear whether Massport made filings under this executive order, and if so, what such filings must have said. This situation should be clarified in the ESPR.

11.3 >> *The ESPR should discuss the applicability of the Scenic Act Law provisions to the Hanscom area.*

In 1999, at the initiative of Congressman Meehan, Congressional legislation designated portions of the Sudbury, Assabet and Concord Rivers as components of the National Wild and Scenic Rivers System. This is a relatively new development and Massport should explain how it is approaching compliance with the act, and what steps will be taken.

11.4 >> *The Scope should require the ESPR to analyze the economic impact of lowered home values under the flight path and road maintenance around the airport.*

Massport's Proposed Scope includes "The State of Hanscom March 2001" as an attachment. A section on Economic Benefits of Hanscom Activity is included. Economic costs, particularly environmental airport impact on home values and financial burdens to local community should be enumerated (road maintenance, municipal security and emergency services, etc.).

12 SEGMENTATION

12.1 >> *Massport should be required to account for all past, present, and future activities at Hanscom Field undertaken by itself, its tenants, and Hanscom operators so as to not lose track of the cumulative impacts of Hanscom Field activities.*

Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. This requires a baseline of no later than 1985. Pre-base year activities should be described.

12.2 >> *Developments in the area outside Hanscom Field must be taken into account, as they limit the potential growth of Hanscom.*

New development has occurred in the 4 towns near the airport. In addition, the Air Force Base has populated and refurbished additional buildings. Bldg. 1614 is adding 1,000 additional AF & contractor personnel ("Hanscom AFB Transportation Demand Management Plan, Travel Baseline Survey," prepared by Fay, Spofford & Thorndike, Sept. 2000). This outside growth must be taken into account, in order to avoid segmentation.

12.3 >> *Cumulative impacts of the developments in the area owned by Massport must be taken into account.*

The MEPA regulation explicitly prohibits segmentation, yet various infrastructure facilities such as hangars, building expansions, parking lot expansions, enlargement of Runway Safety Area (in effect, runway expansion), etc. have taken place, or are planned, to take place a little at a time. Projects are called "rehabilitation" and "restoration." No ENF has been filed and no EIR has been required.

The ESPR should outline a mechanism for the handling of any future expansion, in such a way, that environmental impacts can be evaluated, not generically, as in the ESPR, but specifically, before a new development begins.

13 GROUND TRAFFIC

- 13.1 >> ***The area covered and the number of intersections should be expanded as the Secretary instructed. The Study Area should include, at a minimum, the 22 intersections studied by the Air Force in 1999 or by boundary of Rte. 2 to the south, 128 to the east, Rte 3 to the north and Concord to Bedford center on the west.***

Traffic counts should be projected to what might be the normal conditions (without the post-September impacts) in flight activity. The presentation of traffic analysis should mirror the format in the Air Force Study, which provides much greater clarity for review than the 95 GEIR. Recent changes, such as the closing of Gate 4 to the AFB, which has caused traffic on Hanscom Drive to increase, should be part of the study.

- 13.2 >> ***Traffic analyses for all study intersections should include the standard Mass Highway Crash Rate Analysis and an evaluation of traffic safety issues in the study area.***

Traffic counts should be projected to what might be the normal conditions (without the post-September impacts) in flight activity. The presentation of traffic analysis should mirror the format in the Air Force Study, which provides much greater clarity for review than the 95 GEIR.

- 13.3 >> ***The traffic study should include an Origin/Destination study of all Commercial/Charter/Corporate OPS passengers and crew that utilize roadway network for access/egress to the airport.***

Traffic counts should be projected to what might be the normal conditions (without the post-September impacts) in flight activity. The presentation of traffic analysis should mirror the format in the Air Force Study, which provides much greater clarity for review than the 95 GEIR.

- 13.4 >> ***The Scope should require plans for formulating and implementing a Traffic Demand Management (TDM) strategy and its coordination with the TDM program of the US Air Force at Hanscom.***

Unlike the Air Force, Massport has not introduced a meaningful TDM program at Hanscom Field. They should coordinate with the Air Force to learn from the Air Base experience, and also evaluate the need for professional staffing. Massport should attempt to identify all business/commercial activity in the vicinity of the airport that, in the aggregate, would justify the inception of a TDM.

- 13.5 >> ***The ESPR should recommit to early notification of any of its plans for future traffic generating development to the 4-Town DRI Committee. A report on TDM should be filed annually. A commitment to annual traffic count reporting should be provided and a 5-year history of traffic counts on the terminal access roadway should be tabulated.***

The ESPR should recognize what the Secretary stated in the Certificate, "In an area of relatively low intensity uses and such substantial and fragile historical and cultural value, strategies to reduce roadway demand should be preferred over strategies that increase (roadway) capacity."

- 13.6 >> ***The ESPR should dedicate careful attention to an ongoing program of traffic monitoring, limitations on traffic that may be imposed, traffic calming solutions and support for the widespread use of modes of travel other than private vehicles.***

The instructions by the Secretary in the 1995 Update Certificate (p. 9) and in the 17 May 1997 Certificate (p. 9) should be fully complied with.

- 13.7 >> ***The ESPR traffic projections should take into account the fact that Hanscom commercial airline passengers are much more frequently dropped off and picked up than are passengers at other airports.***

When a passenger is dropped off and picked up, this generates 4 vehicular trips per passenger boarding the flight, as compared to only 2 when the car is parked.

- 13.8 >> ***Traffic measurements should specify the Average Daily Traffic (adt), as well as peak hour traffic counts, and should be taken on representative peak traffic travel days, and not during selected quiet traffic days or on holiday or vacation periods.***

Mandatory traffic thresholds are in adt; therefore adt should be required. The 1995 GEIR (p. 2-110) contained traffic counts taken on Monday, Sept. 16, 1996. It is not clear how well the traffic on a single Monday represents what the roads really experience. The peak travel day is probably a Friday before the holiday. Traffic also depends on whether the day is sunny or rainy.

- 13.9 >> ***The ESPR should present true impacts of commercial air flights, charters, and business jets on the vehicular traffic.***

Massport has argued in the past that the impacts of commercial flights are insignificant. However, by way of a simple example, assume the number of commercial operations is only 5% of the total. If 95 flights generate only a single vehicle on the road, and 5 flights generate 15 vehicles on the road, then there are a total 170 vehicles on the road, and 75 of them or 44% are generated by the 5% of commercial flights. The impact of the big aircraft on vehicular traffic generation must not be minimized.

14 NOISE

- 14.1 >> ***The ESPR Scope should commit to follow the Noise Workgroup's unanimously adopted recommendations issued in Sept. 1999.***

The Secretary of the EOEI instructed Massport to form a Noise Workgroup (NWG) to recommend how Airport Noise issues should be addressed. Massport did not formally respond to the Metrics recommendations from this report till the evening of Nov. 15, 2001, immediately before the beginning of the MEPA public hearing in Bedford.

- 14.2 >> ***The Time Above Contours should be, 55 dBA (40, 600 & 900 min.), and 65 dBA (10, 20 & 400 min.). In addition, appropriate base times for the 45 dBA contour should be investigated and adopted with concurrence of the HATS Environmental Subcommittee.***

Massport has adopted the NWG Recommendation M2, but the contour levels and time need to be specified. The area inside the contours should be given.

- 14.3 >> ***The Scope should require that the dimensionless numerical ratios for the DNL be given in addition to the dB. These ratios, which express the aviation noise as a ratio to the ambient noise, will provide a layperson with a comprehensible measure of aviation noise by comparing it to noise contributed from all other sources.***

Massport's letter of 15 Nov. 2001 is ambiguous about NWG Recommendation M4. The Scope should be clear and specific. Recommendation M4 was to study and adopt a linear metric that is not susceptible to the misinterpretation inherent in decibel (dB) metrics, such as the DNL. The report suggested, as an example, a linear dimensionless ratio that is essentially a non-logarithmic equivalent of the DNL; it did not recommend this ratio specifically, but presented it as an example of the kind of metric that was desired. Massport should be required to study and adopt a linear numerical ratio metric to complement the DNL.

- 14.4 >> ***The Scope should adopt NWG Recommendation M7. The NWG analyses showed potential errors in the results of the INM, because of the unrealistic selection of input parameters for the model. The Scope should require more realistic input data and a validation of the modeled data against actual measurements taken over the same period of time as modeled flight data. Helicopter noise should be included in modeling.***

The Noise Workgroup discovered that the input data to the INM model assumed a regular airport flight pattern, and did not represent the Hanscom flight patterns, which are generally lower because of the proximity to Logan. Logan flights over the Hanscom air space and helicopter traffic were not taken into account.

- 14.5 >> ***The Scope should require Massport to address the issue of proper noise monitor location so as to avoid the proximity to some exceptionally high noise source, such as the Concord treatment plant (Ref. NWG Metrics Subgroup Recommendation 11).***

Location of monitors next to particular noise sources defeats the purpose of examining the impacts of aviation noise on the background. Members of the Metrics subgroup should be consulted by Massport to determine whether the new locations selected by Massport are more reasonable and away from local, external noise sources.

- 14.6 >> ***The Scope should require that recent unusually high background noise readings due to wind be checked out, and the problem of wind distorting readings addressed.***

Recent measurements, when there were no flights (immediately after September 11), indicated that wind might be the source for high background noise at some of the sites.

- 14.7 >> ***Aviation noise projections should take into account the changed patterns of flying as a result of runway closings and the events of September 11. The Scope should include a discussion and provide flight data patterns in three dimensions; i.e., include elevation.***

Hanscom flight patterns changed dramatically when Runway 5/23 was closed for resurfacing. Massport should be required to provide separately flight data for each runway. Also flights appear to be now coming in lower at Hanscom. The actual flight elevation patterns should be discussed in the section on aviation trends at Hanscom, and included in the modeling.

15 AIR QUALITY & HEALTH

- 15.1 >> ***ESPR should provide measured data and an accurate baseline for local environmental conditions.***

It is impossible to evaluate environmental changes that have taken place at the end of a period unless actual measurements have been taken at the beginning of the period. No measurements were disclosed in the 1995 GEIR. If no measurements are taken in this ESPR, future ESPRs will continue to deny the MEPA Office and the communities a fair evaluation of air quality changes that may have taken place. Massport does report air quality data at Logan.

15.2 >> *ESPR should discuss the toxins in the air from the use of leaded aviation fuel and kerosene.*

The ESPR should be required to examine potential air quality impacts from the use of leaded aviation fuel and kerosene in the airplanes.

A recent study of air toxins conducted at Teterboro Airport in New Jersey found fuel related compounds of benzene, toluene, ethylbenzene, xylene, 1,3-butadiene, and trimethylbenzene. Of these, benzene and 1,3-butadiene are contaminants which drive the risks of cancer. Noncarcinogenic risks are associated with benzene and toluene.

The ESPR should include a screening study for the level of these contaminants at Hanscom Field.

15.3 >> *ESPR should discuss the dangerous impacts of air contaminants (TACs) like Nitrogen Oxides (NOx) and particulate matter.*

The ESPR should contain a detailed analysis of the emissions of NOx (oxides of nitrogen) and volatile organic compounds as precursors of photochemical smog (ozone). NOx is reported to affect both human health and cause acid rain, which harms trees and wildlife. Some of the new jets with quieter engines may release more NOx than the old noisier ones.

Fine particles also are of great concern because they are linked to the most serious respiratory effects, including persistent coughs, phlegm, and wheezing and physical discomfort, according to the Environmental Protection Agency.

Massport has reportedly already been asked by the Secretary to submit a plan to the state's DEP to reduce the emission of NOx. Massport officials said they are committed to reducing the emissions at Logan in both airplanes and ground vehicles. The ESPR should consider the potential changes pointed out by the DEP and extend its commitment to the upwind emissions of precursors from Hanscom Field

15.4 >> *The ESPR should describe and take into account the EPA proposals to make the National Ambient Air Quality Standards (NAAQS) more stringent. Threshold level for air quality mitigation efforts should be defined and sample measurements taken.*

The Clean Air Act, which was last amended in 1990, requires EPA to set NAAQS for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national air quality standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

The EPA Office of Air Quality Planning and Standards (OAQPS) has set NAAQS for six principal pollutants, which are called "criteria" pollutants. Units of measure for the standards are parts per million (ppm) by volume, milligrams per cubic meter of air (mg/m³), and micrograms per cubic meter of air (µg/m³). The six pollutants are Carbon Monoxide (CO), Nitrogen Dioxide (NO₂), Lead (Pb), Particulate (PM 10); i.e., particles with diameters of 10 micrometers or less, Particulate (PM 2.5), and Sulfur Dioxide (SO₂). However, these standards are currently under review, and in Massachusetts the Secretary is leading the way to protect air quality.

According to the Globe story, State Environmental Affairs Secretary Robert Durand predicts that "we're working now with Massport to figure out ways to reduce those gases." Secretary Durand said, "the one industry that has gotten the free ride is the airline industry." Accordingly, we urge that the ESPR set threshold levels for air quality mitigation efforts that Massport should follow standards that are the stricter than those in the NAAQS.

15.5 >> *ESPR should outline a concrete plan for establishing permanent monitoring location for all of the dangerous emissions and specify a data-taking plan. The ESPR should provide evidence to clarify whether each nitrogen dioxide (NO2) monitoring location is likely to*

over- or under-state NO2 levels within the communities.

The Natural Resource Topic Review Committee (NR TRC) identified and reported in their comments on the 1995 GEIR, several areas of serious disagreements with the air quality analysis presented in the 1995 Hanscom Field GEIR Update (Ref. "Analysis & Comments on the Hanscom Field 1995 GEIR Update, June 9, 1997; RE: EOE A #5485/8696"). To avoid a repetition of these deficiencies, we ask MEPA to require Massport to conduct sufficient local air quality measurements to comply with the previous Scope requirement of providing "an accurate baseline for local environmental conditions".

The 1995 GEIR Scope Certificate (p. 9) required that air emission estimates be presented as concentrations as well as kilograms per year. We again request that both average levels and "hot spots" and peak conditions be addressed. However, we also request some confirming measurements.

15.6 >> *The ESPR should outline its plan for charging the polluters higher landing fees in response to Secretary Durand's proposal.*

The Boston Globe reported on 3/10/2001 that Logan Airport is one of the state's single greatest contributors to summertime smog and that jets at Logan are emitting tons of nitrogen oxides every year, a key ingredient in both smog, which aggravates asthma, and acid rain, which harms trees and wildlife.

Hanscom Field already is the second busiest airport in Massachusetts and, with the rapid expansion of commercial and jet traffic, is also likely to have become, or become, a major source of NOx emissions. Accordingly, in addition to data similar to those provided in the past, the ESPR should discuss in detail Massport's approach to embracing Secretary Durand's suggestion that, "There need to be incentives on the ground" and "to create those incentives" by charging the polluters higher landing fees".

15.7 >> *The ESPR should look not just at emissions from aircraft and vehicles but should also present concrete plan and schedule to reduce emissions to be implemented at Hanscom by Massport.*

Once the need to reduce emissions is identified, a plan to overcome the problem must be implemented.

15.8 >> *The ESPR should examine and report data at the State Health and Human Services Department comparing the four communities to state averages with respect to incidence of childhood acute leukemia below the flight paths, and illness and death from myocardial infarction and alterations in heart rate in the elderly.*

Health problems have been linked to the increases of particles in the air in the vicinity of airports and under the flight path. Some of the medical data is relatively new, and was therefore not discussed in the prior GEIRs.

15.9 >> *The ESPR should discuss stress impacts due to the airport activity in normally quiet zones, such as the surroundings of Hanscom, on the population, in general, and the elderly and children, in particular.*

The prior ESPRs generated comments by schools and elderly residences citing stress and discomfort caused by aviation traffic on the individuals in their care. The ESPR should conduct a survey, or cite prior professional surveys, to evaluate the impacts under similar circumstances in different locations.

16 WETLANDS/WILDLIFE/WATER

16.1 >> *Wetlands delineation, not more than 3-years old, should be the one approved by the local Conservation Commissions.*

Wetland delineation was promised by Massport, but did not taken place till this month. The delineation is yet to be approved by and accepted by the local Conservation Commissions.

16.2 >> *The Scope should include plans to reduce impacts on the Cambridge Reservoir, Shawsheen River, Elm Brook and local water wells and the status of vernal pools.*

The wetlands delineation conducted by Massport, as of the time these comments are made, did not include the waterways in the area included in the Draft VMP, or the Hartwell Town Forest in the Town of Bedford and the privately-owned areas around the airport.

Several vernal pools exist on the Massport property; their status should be discussed.

The attached copy of the 16 November letter from the Boston Chapter of Trout Unlimited to the HATS ES indicates that they were not notified of the draft plans for the VMP and expresses their concern for the area pertaining to the Shawsheen River Wetlands at the end of Runway 29. Their serious concern about herbicide poisoning, thermal pollution, groundwater runoff and a lack of public access for viewing the site should be reflected in the ESPR Scope specified by the Secretary.

17 PUBLIC PARTICIPATION

17.1 >> *The ESPR process should encourage public participation and be responsive to it.*

The community's experience with the 1995 GEIR was that the public sessions were primarily devoted to Massport's briefings. Documents were distributed just prior to the meeting. Consequently, they could not be examined in advance and there was little room for comments and discussion. We request that a number of copies of the draft documents to be discussed be made available in the 4 town halls and libraries, as well as on a publicly-accessible Website, so that diligent members of the public can have a preview before the meeting, and that they be given an opportunity to ask questions and make comments. If the Scope is not responsive to sensible public comments, or if the process of the public meetings is perfunctory, the public may take a cynical attitude that their involvement and input really do not matter. It then will become difficult to get the public to participate.

17.2 >> *Massport should be required to respond to Public Comment in a timely manner in four ways. Inclusion of a photocopy of the actual comment, and the three ways Massport used in the Responses to comments on the 1995 Hanscom Field GEIR Update.*

For the 1995 GEIR, Massport responded to Public Comment in three ways: response to main points raised in the aggregate public commentary, response to individual responses, and a Response Summary. These are all helpful ways to get a clearer picture of public comment and Massport's responses and should be continued. However, it will very helpful for the Public to be aware of the entire Public Comment record through inclusion of photocopies of the actual public comment submission.

The public comment of the Massport Draft 2000 ESPR Scope with Massport's responses should be publicly distributed within 60 days of the issuance of the actual MEPA Scope. Public comment on the Draft 2000 ESPR along with Massport's responses should be included.

In the Vol. 2 of the 1995 GEIR, commentators were listed, but there was no alphabetical index. Comments were numbered, but numbers were not related to commentators.

- 17.3 >> ***The schedule for public review on any ESPR draft should be 60 days and should be extended, if the review period conflict with the summer or the winter holiday months, i.e., July, August and December should not be included in the period counted for public comment.***

Town Boards are constituted from volunteers who have career employment requiring them to schedule their vacations and holidays to occur during these months, which means that meetings of the full boards during these months is difficult, if not impossible. Although most volunteers may only schedule vacation a couple of weeks each, it is difficult to assemble these volunteers to arrange their time away to coincide with others.

- 17.4 >> ***Massport should be required to maintain a section of their Website to provide timely information on the ESPR development. The Draft Scope, the MEPA Scope, draft materials and other relevant documents should be included. In addition, the scope and other draft documents should be available in electronic format.***

Massport presently maintains an extensive web site, part of which contains extensive documentation for proposals, bids, construction, etc. of information not directly accessible to the general public. Massport should post relevant documents (reports, data, memos, etc.) so that the Public will be able to participate more easily. Documents can be provided in a PDF format to alleviate Massport concerns that someone may download and maliciously edit them.

18 MISCELLANEOUS

- 18.1 >> ***The ESPR should be organized as any other professional report, providing easy means of access to relevant topics. The final ESPR Report should be available in hard copy and on CD. The scope certificate should be placed at the beginning of the Report.***

The document should be fully indexed referring the reader to all the places where a topic is discussed, whether in volume 1 or volume 2.

- 18.2 >> ***The ESPR and other information of interest to the general public (such as, for example, the Annual Noise Report) should be permanently available in a publicly-accessible Website.***

Other airport authorities (such as that in Minneapolis/St. Paul) make extensive use of the World Wide Web to inform the public, share documentation, and archive data. This is a cost-effective, efficient, and timely means for public outreach; the use of Internet technologies represents an excellent 'bang for the buck' investment of public relations expenditure, and should be required of Massport.

**Environmental Subcommittee
of the Hanscom Area Towns Committee**

Town of Lexington, 1625 Massachusetts Avenue, Lexington, MA 02420

November 27, 2001

**THE LIST OF ACTIONS (Rev. 3)
REQUIRED OF MASSPORT
BEFORE THE 2000 ESPR BEGINS**

PROJECT NAME: L. G. Hanscom Field 2001 ESPR; Bedford, Concord, Lexington, Lincoln

Reference documents:

- 1) Scope Certificate EOE A Project 5484/8696, May 17, 1996
- 2) 1995 GEIR Update Certificate, EOE A #5484/8696, June 30, 1997
- 3) Massport's Draft Section 61 Finding, September 30, 1997
- 4) The EOE A Certificate accepting Draft Sec. 61 Finding, Nov. 18, 1997
- 5) Letter from the Department of Food and Agriculture, Oct. 26, 2001

A review of the reference documents identifies certain actions to be taken by Massport before the new ESPR begins.

In each section below, we cite an abbreviated version of the requirements that have been identified by the Secretary and commitments made by Massport. We then list some of the specific Actions Required, i.e, the actions to be taken and reports to be provided by Massport at the beginning of the GEIR process so as to comply with the instructions and commitments made in the documents referenced above.

I. Request for Interest

Ref. 3, Draft Sec. 61 Findings, p. 3, states, "Massport will copy the MEPA Unit when Requests for Proposals and similar publicly issued Requests for Proposals are circulated for new developments at Hanscom."

ACTIONS REQUIRED

- * **A summary list of copies of documents filed with the MEPA Unit, such as Requests for Interest (RFI), Requests for Proposals (RFP), Requests for Qualification (RFQ) as Massport continues the development process.**
- * **The list of documents that should have been filed with the MEPA Unit, but were not filed.**
- * **An explanation why new hangar development, terminal building expansion, and other development projects at the LG Hanscom Field (Hanscom) have not been treated as development projects.**

II. Relationship with Local & Regional Planning

Ref. 2, The June 30, 1997 Certificate, states, "Consistent with the mandate of MEPA and Executive Order 385, all concrete proposals for development at Hanscom Field should be reviewed for consistency with this document (Four Town Planning Study) and with the Master Plan."

In Ref.3, p. 3, Massport committed to "review specific projects for consistency with the August, 1997 *Hanscom Area Towns (HATS) Draft Master Plan* (or the Final Master Plan, when issued) and with the June 15, 1978 *Hanscom Field Master Plan* (or any subsequent Master Plan)." ... "Should a

specific proposal prove inconsistent with the current *HATS Master Plan* or the current *Hanscom Field Master Plan*, but be pursued as consistent with the Massport's mission at Hanscom Field, it will be discussed with the four towns before filing with MEPA. A clear rationale for any inconsistencies will be provided in any needed Environmental Notification Form (ENF) and refined as may be needed in any further MEPA review documents."

ACTION REQUIRED

- * **An explanation why neither concrete proposals for hangar development, terminal building expansion, introduction of commercial aviation in aircraft with *more seats and heavier* than the limit specified in the 15 June 1978 Master Plan, nor other development projects at Hanscom were not reviewed for their consistency with the 1978 Master Plan and the commitment that Hanscom will remain a general aviation airport and not become a regional airport.**

Ref. 2, the June 30, 1997 Certificate, instructs Massport, "All projections and plans for expansion of aviation activity at Hanscom should be made in light of expanding opportunities for rail travel in the northeast."

ACTION REQUIRED

- * **An explanation why Massport's campaign to bring more commercial service to Hanscom so as to link Hanscom with the already overcrowded LaGuardia Airport ignored Amtrak's improvements of rail service in the Northeast Corridor.**

III. Purpose and Effect of GEIR

Ref. 2, the Certificate, p. 3 states, "The GEIR does not relieve Massport of its obligation to file an Environmental Notification Form with the MEPA Unit for any proposed development that meets or exceeds a MEPA regulation threshold.

ACTIONS REQUIRED

- * **An explanation why Massport did not file an Environmental Notification Form (ENF) with the MEPA unit for the proposed developments that meet or exceed MEPA regulation thresholds.**

(See Ref.: June 4, 2001 letter from HATS to the MEPA Office regarding the following ENF thresholds: "Expansion of an existing runway at an airport," and an increased number of parking spaces assigned to the Civil Terminal and increased adt, [see 301 CMR 11.03 (6)(b), Items 3 and 14]).

IV. Update on Operations/Development

In Ref. 3, Draft Sec. 61 Findings, p. 4, Massport states, "...Therefore, Massport proposes to track actual changes in aircraft activity at Hanscom—both increases and decreases— and compare these data to the range of future activity levels and fleet mix defined by 0%, 1% and 3% growth cases assessed in the 1995 *GEIR Update*. Any needed adjustments to the forecasts into the next century then can be made upon the basis of those data in the 2000 *GEIR Update*."

ACTIONS REQUIRED

- * **Supplemental information including an assessment of the factors resulting in past inaccurate forecasts, and a comparison of those factors and the bases for present forecasts, for both operations and fleet mix projections. [Revisiting the earlier forecasts is important, because it can prevent a repetition of the same errors and inaccuracies.]**
- * **An explanation of why Massport allowed, and is encouraging, a *much faster* rate of growth of commercial aviation and of the jet fleet at Hanscom than was postulated in the 1995 *GEIR Update*.**

- * **A report by Massport explaining why it has recently proposed instituting lower angles and a wider clearance area at the end of Runway 5 (and possibly at the ends of other runways, as well), although such drastic action was not mentioned or analyzed in the 1995 GEIR. Indeed, the airport has functioned well with the current clearance angles (1995 Hanscom GEIR Update, Vol. 1, 20:1, 34:1) and the current Runway Safety Areas. Earlier this year, the FAA indicated at the T. F. Green Airport that there is no urgency in making changes expanding the runways (see Providence Journal, June 24, 2001).**
- * **An explanation why Massport did not file an Environmental Notification Form (ENF) with the MEPA unit before filing a request with the FAA to have Hanscom Airport certificated for commuter and on-demand flight operations with larger aircraft under Part 135.**

V. Cultural, Historic and Agricultural Resources

Ref. 4 of Nov. 18, 1997, the Acceptance of Draft Section 61 Findings by the Secretary states, "Finally, I expect Massport will begin shortly on the coordination and outreach efforts described in the Certificate. These include work with: staff of the Minute Man National Historical Park on impacts to the Park and Battle road,..."

Ref. 3, Draft Sec. 61 Findings, p. 4, acknowledges, "The Certificate asks that Massport: confirm or amend its inventory of cultural, historical, and recreational resources; engage in a dialogue with the Minute Man National Historical Park around mitigation strategies; and work with the four towns and the Department of Food and Agriculture to protect Massport-owned agricultural land."

In Ref. 5, the Department of Food and Agriculture asserts the promised plan for protecting agricultural resources has not yet been prepared.

ACTIONS REQUIRED

- * **A report on coordination with and outreach to the Minute Man National Historical Park (MMNHP) and the efforts to mitigate traffic impacts on Route 2A, a road of national historical significance, the Battle Road.**
- * **A report on the plan Massport was urged to develop with the Department of Food and Agriculture and the four communities to protect Massport-owned agricultural land from conversion to non-agricultural uses.**

VI. Wetland / Wildlife / Water Resources

The Certificate, Ref. 2, June 30, 1997, p.6, states, "... I encourage Massport to continue to continue to work with the four towns to delineate wetlands boundaries and identify and certify vernal pools" and also "There is a question whether Elm Brook is a perennial or intermittent stream. Massport should work with the towns to make a definitive determination about Elm Brook's status."

The Certificate, Ref. 2, p. 6, continues, "The Scope clearly indicated that Massport was responsible for collecting data as necessary to present a complete and accurate water quality baseline. Massport chose instead to rely on 1989 testing data from the department of Environmental Protection (DEP) and 1992 NPDES testing data. Data as old as that cannot provide an accurate baseline for a 1995 Update, and I do not believe it would be prudent to wait until the 2000 Update to review the new testing data. Therefore Massport must commit in the Draft Section 61 Finding to develop a schedule and implementation plan for water quality monitoring program."

In Ref. 3, Section 61 Findings, p. 5, Massport commits, "Massport proposes a three year surface water quality monitoring program and address any concerns with the data used in the *1995 GEIR Update*. This proposal will be reviewed with the Department of Environmental Protection (DEP) prior to implementation."

ACTIONS REQUIRED

- * **A report on the delineation of wetlands boundaries that was to begin in 1997 through a formal Request for Determination of Applicability (RDA).** [Since wetlands were not mapped in the 1995 GEIR, Massport was encouraged by the Secretary of the EOE (Secretary) to delineate the boundaries in cooperation with the four towns and also identify and certify vernal pools. Clearly, this was to be done].
- * **A report on Massport's task to work with the towns to make a definitive determination whether Elm Brook is a perennial or intermittent stream.**
- * **Schedule and implementation plan for water quality monitoring and testing program.** [Such a program was required by the Secretary to look at both groundwater and surface water. The plan for it was to be submitted to the MEPA Unit, DEP, the EOE basin team, and the Conservation Commissions by 31 December 1997 and a summary of the first round results of the testing was to be submitted by 31 December 1998. Massport has not met this obligation.]

The 1997 Certificate, Ref. 2, states (p. 7), "... It (The DEP comment letter) also points out Hanscom's significant contribution to flooding last October (1996). DEP indicates that Massport should identify ways in which stormwater runoff can be controlled and recommends consideration of infiltration or storage of stormwater, rather than the current condition at most of the site of the direct stormwater discharge to the Shawsheen River." In addition, "The 2000 Update should include a report on the status of changes to Hanscom's stormwater management program and on any revisions to its procedures for notifying the four communities of the changes to the plan."

ACTION REQUIRED

- * **A statement on whether the plan for improved storm water runoff control has been adopted (as requested by the Secretary), and whether the communities and DEP have been notified of the changes.**

VII. Rare and Endangered Species

In Ref. 3, Massport's Sec. 61 filing, p. 3, there is a commitment, "This (MNHESP) listing will be revisited in future project specific filings to assure its currency." See also Item III above.

ACTIONS REQUIRED

- * **A report how the alterations of the habitat resulting from Massport's vegetation management actions (planned even before the 2001 ESPR is completed) will affect rare and endangered species and results of the MNHESP mapping.** [The Vegetation Management Plan, the filling of wetlands, and the Runway Safety Area Project are among the specific projects for which Massport should be filing an ENF including a discussion of impacts on the rare and endangered species (according to MEPA regulations at least a year before the project begins).]
- * **A report on Massport's justification for not adopting some of the recommendations on noise mitigation and metrics, as adopted unanimously by the Noise Workgroup and presented in its report filed with the MEPA Office.**

VIII. Noise

In the Certificate, Ref. 2, p. 8, the Secretary states, "However, the text and comment letters raise serious questions about some of the data, protocols and analysis, and (especially), proposed mitigation, which need to be answered before Massport begins its 2000 Update."

ACTIONS REQUIRED

- * **A report on whether Massport has implemented specific recommendations on noise mitigation and metrics, as adopted unanimously by the Noise Workgroup and presented in its report filed with the MEPA Office. The Noise Workgroup was convened by Massport at the request of the Secretary and included knowledgeable members and representatives of the communities surrounding Hanscom, and of users of the airport. Massport's representatives and noise experts participated in the discussions. If Massport had objections, why were they not submitted in writing either to the Noise Workgroup nor to the MEPA Office?**
- * **A report on the relocation of the poorly placed monitors (specified in the report) and on new measurements and methods of measurements undertaken by Massport.**
- * **A report on flight pattern changes and mitigation measures instituted at the airport.**

IX. Air Quality

The Secretary's Certificate, Ref. 2, p. 9, states "The Draft Section 61 Findings should include a mitigation plan that looks not only at emissions from aircraft and vehicles but also commits to examining how its (Massport's) purchasing and maintenance activities can be adjusted to reduce their emissions."

ACTION REQUIRED

- * **A report on Massport's mitigation plan and its adjustments to purchasing and maintenance activities aimed at reducing emissions.**

X. Traffic

The Secretary's Certificate, Ref. 2, p. 9-10, states that, "The analysis should also look at other modes of transportation."

The Secretary goes on to say, "The Scope for 2000 Update will require Massport to look at impacts on a larger area and to consult with local planning boards and MHD (Mass. Highway Department) in developing its analysis and in proposing and scheduling appropriate mitigation."

And further, "Between now and then, I expect that Massport will begin its coordination with local, regional and state agencies by developing in concert with them, and with its own tenants, a Transportation Demand Management Plan (TDMP) strategy which encourages the use of public transit and other high occupancy vehicle modes. Due to the critical nature of traffic impacts on the Minute Man National Historical Park, the park should also participate in these discussions where appropriate. The 2000 Update should include a discussion of the status and outcome of these coordination."

The Certificate continues (p. 10), ""When those studies (an ongoing Central Transportation Planning Staff [CTPS] study of the Route 2 corridor) are complete, Massport must promptly circulate - - to its mailing list and to the MEPA Unit - - interpretations that relate to the results of those studies, including the impacts of proposed changes, to the GEIR Update's analysis of traffic in the vicinity of Hanscom Field."

ACTIONS REQUIRED

- * **Identification of the larger area surrounding Hanscom Field that is to be studied.**
- * **A report on the Transportation Management Strategy adopted and implemented by Massport in consultation with local planning boards, MHD, the Air Force, and MMNHP.**

- * **A report on any updates of the studies by Central Transportation Planning Staff (CTPS) of the Route 2 corridor and whether they have been circulated to Massport's mailing list and the MEPA Unit.**
- * **Massport's interpretation of the impacts of the proposed changes to the GEIR Update's analysis of traffic in the vicinity of Hanscom Field, and circulation of such an analysis.**

XI. Hazardous Waste / Hazardous Materials

In the Certificate, Ref. 2, p. 11, the Secretary requested that "The 2000 Update should include a section on hazardous materials used and/or stored at Hanscom Field. The section should identify such materials, the quantities used and stored, description of their storage areas (including ground and aviation fueling facilities), detailed contingency plans in case of accidents, the physical relationships between the areas where hazardous materials are used and stored and natural resources, and Massport's plans for reducing the use of hazardous materials at Hanscom Field."

Massport's Sec. 61 Findings document, p. 9, states, "Massport proposes to continue to report upon the most current status of these sites (21 E sites at Hanscom Field) and their remediation in project specific filings, as appropriate, and in the 2000 GEIR Update."

ACTIONS REQUIRED

- * **A progress report on Massport's changes in the procedures to control and reduce the use of hazardous materials, and contingency plans in case of accidents.**
- * **Reports on the most current status of the hazardous sites and their remediation as promised by Massport.**

XII. Public Participation

In the Certificate, Ref. 2, p. 11, the Secretary requested that "For the 2000 GEIR Update, Massport should propose and commit to an appropriate public participation process (which responds to the comment that a Citizen Advisory Committee dedicated to the GEIR Update would be a more effective mechanism than HATS which also has other business to conduct unrelated to the GEIR Update) and should propose a schedule for it."

In the Section 61 Findings, Ref. 3, p. 9, Massport committed, "Massport will, when the 2000 GEIR process begins, consult with the Secretary concerning an appropriate public participation process."

ACTIONS REQUIRED

- * **Any proposal Massport may have for empowering HATS and ESC in the ESPR process should be presented as soon as possible.**
- * **The schedule for public review should be 60 days and should be extended, if the review period conflicts with the Town Meeting schedules of the four towns or with the summer vacation or the winter holiday months, i.e., July, August and December should not be included in the period counted for public comment.**