

MEMORANDUM

Date: July 23, 2003

To: Hanscom Area Town Selectmen
Environmental Subcommittee

From: Forrest C. Lindwall, MAI

Re: 2000 L.G. Hanscom Field ESPR
Ground Transportation Review
MAI Job No. 418.01

This office has reviewed the ground transportation analyses presented in the 2000 L. G. Hanscom Field Final ESPR prepared by Massport. The traffic analyses are presented in Chapter 6 "Ground Transportation" and traffic impact mitigation is summarized in Chapter 12 "Mitigation".

With respect to an overview of the ESPR process and the ESPR documents, Draft and Final, we would offer three general comments that should be given serious consideration by HATS, MEPA and Massport before this 2000 ESPR process is concluded. These general comments are as follows:

1. The Final ESPR Scope formulated by MEPA in the Draft Certificate is most disappointing in its lack of responsiveness to the numerous comments regarding traffic in the Draft ESPR and with its departure from the strong statements of expectation for the year 2000 analyses issued by MEPA in the 1995 Final GEIR Certificate.
2. The ESPR process has failed to address the significant issue of how to evaluate the environmental impacts of incremental growth at Hanscom. There is no suggestion by MEPA or Massport that this issue is of any concern to them, thus in the future, Massport will continue to follow established patterns wherein there will only be piecemeal analysis of discrete projects, if such projects exceed MEPA review thresholds.
3. Since the ESPR process is not specifically defined in the MEPA regulations, but operates from a discretionary caveat defined by the EOECA Secretary, and since Hanscom Field is a unique entity that resides in the midst of one of America's Most Endangered Historic Places, it is not unreasonable to have a much stronger environmental oversight of activities at Hanscom Field. To that end, the Secretary should establish a discretionary level of MEPA Review Thresholds for Hanscom Field projects. Ideally such thresholds would be established based on dialogue with both Massport and the communities either collectively or independently.

A table of suggested thresholds requiring the filing of an ENF for "transportation" projects at Hanscom Field is attached to this Memo.

With respect to the Final ESPR, the following presents the specific issues raised by MEPA in the Draft ESPR Certificate, a review of Massport's response thereto and commentary with respect to Massport's response:

VIII. GROUND TRANSPORTATION

VII.1 *Traffic on Hanscom Drive* - *Hanscom generated traffic on Hanscom Drive presently constitutes 12% to 13% of peak hour traffic and is estimated to increase to 16% to 20% of peak hour traffic under the 2005 Moderate Growth Scenario.*

- This commentary by MEPA simply establishes the scenario that future Hanscom-generated traffic will increase at a fairly substantial rate under the Moderate Growth scenario through 2005.
- The broader picture which is presented clearly in Table 6-1 of the Final ESPR is that eight (8) study area intersections will have more than 10% Hanscom Field traffic in 2005 under the High Growth scenario and twelve (12) study area intersections will have more than 10% in 2015 under the High Growth scenario.
- Given the vagaries of future traffic volume estimates and the moving target of traffic volume base lines in this ESPR process, it has become essential that MEPA extract a commitment from Massport to conduct a set of 24 hour traffic counts, once each month on a typical weekday, on Hanscom Drive north of Old Bedford Road (Location F on Figure 6-2) and to report the results of these traffic counts to HATS each month.

VII.2 *Volume to Capacity Ratios* – *“FESPR should include volume/capacity ratios in the LOS traffic tables within the text”.*

- The Final ESPR Tables 6-3 through 6-7 inclusive are presented with both the time delays and volume to capacity ratios for the LOS analyses.
- Wherever the time delays are significant based on Level of Service “F”, the delay is shown as greater than 200 seconds which conveniently avoids presenting the actual time delay.

VII.3 *Local Planning Board Consultation Regarding Traffic Study Area* – *“It should identify whether Massport has consulted with the local planning boards regarding the traffic study area before it was finalized for the DESPR”.*

- The Final ESPR simply re-iterates language from the Draft ESPR with respect to the Traffic Study Area being “reviewed” with the Town planners.

- It has been obvious throughout the ESPR process that specific consultation with local planning boards for the express purpose of defining the boundaries of the Traffic Study Area in the context of the MEPA 1995 GEIR Certificate that requested an expanded Study area for the 2000 review, just did not happen.

VII.4 Show All Access Roadways – *“The FESPR should provide a figure that shows all access roadways clearly marked”.*

- Figure 6-2 in the Final ESPR presents the existing access roadways and possible (future) access locations.
- Figure 6-2 could have been improved significantly by color coding all roadways by functional classification and jurisdictions i.e., state highway versus local control.

VII.5 Delay Factor – See response to VII.2 above.

VII.6 On-Site Parking

- MEPA accepts the on-site parking tabulation presented in the Draft ESPR as the baseline against which future changes can be measured.
- MEPA should also extract a commitment from Massport that analysis of future changes in on-site parking will treat Hanscom Field as one complete entity including all Massport and various tenant parking facilities combined.

VII.7 Transportation Demand Management – *“Given the physical constraints on Route 2A caused by the need to preserve the character of the National Park, traffic mitigation at Hanscom must focus on effective Transportation Demand Management (TDM) measures. The FESPR should:*

1. *Report available information from Massport’s survey of Hanscom Field employees.*
2. *Describe the full range of TDM strategies to be implemented, preferably through partnership with the AFB.*
3. *Review, summarize and analyze, as necessary, existing metropolitan transportation documents and report as to how they relate to Hanscom Field access”.*

- The Final ESPR addresses all three items noted and presents a revised approach from the Draft ESPR for the mitigation of future traffic growth at Hanscom with greater emphasis on Transportation Demand Management (TDM) rather than physical roadway improvements.
- Unfortunately, the Final ESPR falls well short of an appropriate level of effort for an effective TDM program in that it fails to address how the program will be implemented; fails to commit to the establishment of a staff position of accountability; fails to address how the program will be monitored and offers no commitment to the communities with respect to reporting on the effectiveness of the TDM program in the future.
- The TDM narrative also fails to recognize that the HATS communities are involved in the initiation of a variety of TDM measures and coordination with these programs would also be essential.
- The Final ESPR provides an extensive summary of the current Regional Ground Transportation Documents with a quick dismissal of their relevance to Hanscom Field access. Given that Massport is one of the five (5) state agencies that are an integral part of the Boston Metropolitan Planning Organization (MPO), both MEPA and HATS should have much higher expectations for Massport's response to this issue.

VII.8 Parking Fees – *“FESPR should investigate the installation of parking fees for all Massport Parking facilities at Hanscom as part of its TDM program, to discourage single passenger travel to the airport”.*

- The Final ESPR presents a brief synopsis of Massport's consideration of parking fees including the notation that the infrastructure for fee collection equipment is being installed as part of the re-surfacing project at the Civil Air terminal and a summary statement that “Massport has not established a timetable to implement fee collection operations at the parking lot”.
- In essence, the Final ESPR is completely unresponsive to MEPA's request that Massport should investigate the installation of parking fees as part of its TDM program. A more appropriate response would at least analyze the anticipated trip reduction as a result of such fees and based on said analysis, an anticipated timetable for implementation that relates to future trip generation should be established now.

VII.9 Traffic Projections for Cargo Operations – *“It should revisit the traffic projections for cargo operations and the feasibility of constructing a new roadway through the Air Force Base to reach the East Ramp Area”.*

- The Final ESPR provides an expanded narrative with respect to the truck traffic projections for cargo operations, but doesn't specifically identify the time frames for truck trips other than an assumption based statement that 2 to 9 trips would occur during peak traffic hours.
- The Final ESPR offers no specific information regarding the feasibility of constructing a new roadway through the Air Force base nor does it suggest that there has been any further investigation with respect to the statement in the Draft ESPR that cargo trucks could utilize existing roadways within the Base.
- MEPA should extract a commitment from Massport that, regardless of MEPA Review thresholds, the initiation of cargo operations at Hanscom will require the filing of an Environmental Notification Form (ENF) that, at a minimum, specifically identifies flight frequency and times; truck trip frequency and times and travel routes.

VIII. MITIGATION

The MEPA Certificate noted that the Draft ESPR did not provide enough specific mitigation measures to adequately address impacts and indicated that the Final ESPR should include identification of the parties responsible, a schedule for implementation and estimated costs.

- The proposed mitigation measures for Ground Transportation in the Final ESPR focus more on TDM with an appropriate departure from the ill-advised "roundabouts" proposed in the Draft ESPR. However, specific commitments to the measures proposed are vague in that they are not tied to specific targets or thresholds. Further, the very simple and inexpensive measures (Bus Shelter, Bike Racks, Transit Info.) that could be implemented forthwith, thereby commencing the positive mode shift to car pooling and shared ride services in the next few weeks or months, are projected for a 2005 implementation.
- Based on the review commentary above for Chapter 6 and the proposed mitigation in Chapter 12, a more appropriate list of traffic mitigation measures and implementation timetables would be as follows:

	<u>Mitigation Measure</u>	<u>Cost</u>	<u>Timetable</u>
1.	Hire TDM specialist for Hanscom Field and define program goals, staff and responsibilities.	\$50,000.00 per year	January, 2004

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| 2. | Install Bus Shelter
and Bike Racks
(per Table 12-2) | \$10,000.00 | October, 2003 |
| 3. | Implement monthly
reporting of ADT on
Hanscom Drive Growth
of Old Bedford Road to HATS | \$ 500.00
per month | October, 2003 |
| 4. | Implement All-Way Stop
at Hanscom Drive/Old
Bedford Road | \$ 1,000.00 | October, 2003 |
| 5. | Survey Hanscom Air
Passengers | \$25,000.00 | 2004 for use in
2005 Draft ESPR |
| 6. | Conduct study to
determine cost-benefit of
implementing parking fees
(FY 03, 04,05) at Civil Air Terminal. | \$20,000.00 | December, 2003 |
| 7. | Conduct study to determine
effectiveness of Police Control
at Hanscom Drive /Rte. 2A
evaluating thru traffic delays
on Rte. 2A | \$ 5,000.00 | December, 2003 |