

# Hanscom Area Towns Committee (HATS)

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Presentation to  
Massachusetts Environmental Policy Act (MEPA) Office  
on  
2000 Hanscom Draft ESPR  
November 19, 2002



## **HATS ESPR Comments Purpose**

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### **The ESPR should serve several purposes:**

- Provide a retrospective analysis of trends in environmental impacts
- Analyze potential environmental effects from future airport activities
- Describe measures to avoid or mitigate adverse environmental effects

## HATS ESPR Comments Scenarios

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### Scenarios involve enormous growth with major impacts.

- Commercial passengers increase from 162,000 in 2000 to over 659,000 in 2015
- New cargo operation with daily jet flights late at night or early in the morning
- Jet operations increase from 20,000 in 2000 to nearly 55,000 in 2015 (excluding flights from 11pm to 7am)



## HATS ESPR Comments Scenarios

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**The scenarios include new infrastructure that would significantly change the character of the airport.**

- New hangars for corporate jets and cargo operations
- Major modifications to the terminal building
- Three new access points to the airport
- New hotel and relocation of flight school
- New hangars where none exist now



## HATS ESPR Comments Scenarios

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### Massport's description of scenarios downplays potential impacts

- Other reports and statements by Massport and its consultants indicate that key scenario assumptions are likely to understate impacts
- Planned or reasonably foreseeable activities are not included in the scenarios or impact analysis
- Activities described as occurring in 2015 could happen much earlier
- Scenarios are not just analytical tools - Massport is already moving ahead with some components

**but many scenario elements require little or no environmental review beyond the ESPR process.**

## **HATS ESPR Comments Impacts**

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### **Noise, traffic, and air quality impacts from Hanscom have all increased since 1995**

- Several measures show increase in noise levels :
  - Total noise exposure (EXP) increases by as much as 1dB
  - Extent of noise contours increase over Concord and Lexington
  - No comparisons presented for other noise measures in ESPR
- Average Daily Traffic (ADT) at the approach to Hanscom Field has increased 87% since the last GEIR
- All air pollution emissions have increased including a 68% increase in NOx

**and continue to increase under all future scenarios.**



# HATS ESPR Comments Mitigation

## Mitigation measures are inadequate.

- Types of mitigation considered are very limited and often inappropriate
- Mitigation is not tied to specific impact levels or triggers
- No schedules or cost estimates provided as required by Scope Certificate



## **HATS ESPR Comments** Aviation Forecasts & Planning

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### **ESPR does not meet basic planning document requirements.**

- Aviation demand forecasts are fundamentally flawed so as to not be usable for any reasonable planning purpose
- The infrastructure representations made in the ESPR are not valid:
  - Rely on flawed aviation demand forecasts
  - Underlying assumptions are unreasonable
- ESPR was not meaningfully placed in a proper regional planning context



## **HATS ESPR Comments** Aviation Forecasts & Planning

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**ESPR defects are so significant that document has to be revised.**

- Demand forecasts should be modified to have meaningful upper and lower bounds and a probable forecast added
- Infrastructure scenarios need to be revised based on new forecasts and more realistic assumptions
- ESPR needs to give more than lip service to other planned or proposed transport infrastructure projects

## HATS ESPR Comments Planning

**The ESPR does not clearly describe Massport's planning strategy or vision for Hanscom.**

- No planning strategy is presented only scenarios without probabilities or value judgments
- Type of airport
  - General Aviation
  - Commercial Passenger Airlines
  - Cargo Airlines



## **HATS ESPR Comments Planning**

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**No analysis of how consistent scenarios are with other Massport plans and documents:**

- **1978 Master Plan**
- **1989 Airport Layout Plan (unsigned 1992 ALP draft?)**
- **1980 Noise Rules**
- **Previous GEIRs**
- **1995 SH&E Future Options for Massport at Hanscom Field**
- **1997 Filing Executive Order 385**
- **Massport Annual State of Hanscom Yearly Reports**
- **Draft Vegetation Management Plan**
- **Massport Website**
- **Misc. Reports including Runway Safety Area Report**

**Or local, regional, or other planning documents...**

# HATS ESPR Comments Planning

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## Federal/Regional/Local Planning – Key Plans:

- **Minute Man National Historical Park General Management Plan**
- US Air Force General Management Plan
- US Air Force Cultural Resources Study
- Walden Woods Special Resource Study
- FAA – **Several Documents** including NPIAS
- **NEPA/MEPA**
- New England Regional Airport System Plan
- New England: At the Forefront of Building a Regional Aviation System.
- Executive Order 385
- **MAPC MetroPlan 2000**
- Boston MPO Regional Transportation Plan
- MAGIC Carpet Study
- Four Town Planning Study
- **Local Comprehensive Plans**

# HATS ESPR Comments Planning

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## Other Related Cultural/Historic Plans and Documents:

- National Historic Preservation Act
- Wild and Scenic Rivers Act
- Massachusetts Historical Commission
  - State Register
  - Inventory of the Historic Assets
  - Mass. Cultural Resources information System



## HATS ESPR Comments Traffic

### Traffic analysis is incomplete and ignores key issues.

- Does not address important elements in the Scope Certificate
- Analysis of intersection capacity for peak hour traffic only does not provide true picture of traffic conditions
- Approach for analyzing intersections where police control is used is inappropriate





## **HATS ESPR Comments Traffic**

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**Hanscom traffic has increased significantly since the 1995 GEIR, but the 2000 ESPR underestimates future impacts.**

- Average Daily Traffic (ADT) at the approach to Hanscom Field has increased 87% since the last GEIR .
- Estimated background traffic growth, based on data outside the roadways/intersections studied, underestimates future traffic impacts.
- Estimates of future vehicle trips to/from Hanscom are too low

## HATS ESPR Comments Traffic

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**ESPR fails to adequately assess impacts from new access points assumed in the future scenarios.**

- Ignores potential for increased truck trips related to off-site cargo distribution facilities
- Does not modify the traffic study area to take into account potential impacts from new access points
- Fails to provide any details or sketch plans of new access points



## **HATS ESPR Comments Traffic**

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**Traffic mitigation in the ESPR is woefully inadequate and lacks any serious commitment by Massport.**

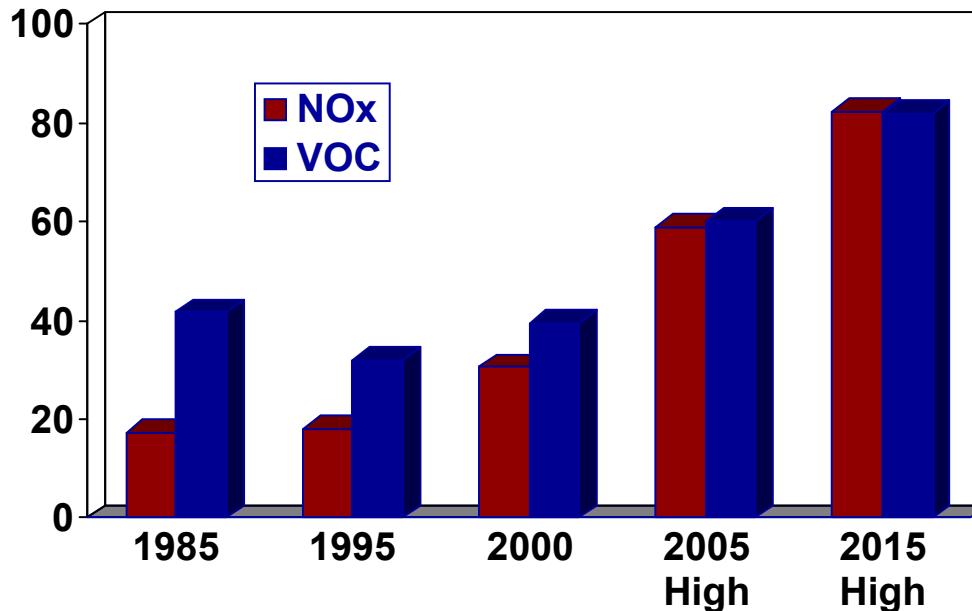
- No preliminary plans that identify rights-of-way for suggested “roundabouts”/rotaries.
- Proposed mitigation should include Massport commitments to:
  - Regular monitoring and reporting of traffic entering/leaving airport
  - Staff and/or funds to participate in development of TDM program and establishment of a TMA
- No meaningful response to language in Scope asking Massport to focus on strategies that reduce roadway demand rather than ones that increase capacity

## HATS ESPR Comments Air Quality

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**Air pollution emissions have grown since 1995 and are projected to increase dramatically under future scenarios**

Hanscom NOx & VOC Emissions (1000s of kg/yr)



**but no commitment is made to avoid or mitigate these impacts.**

## **HATS ESPR Comments Wetlands/Wildlife/Water Quality**

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**The ESPR lacks sufficient information to assess wetland and water quality impacts and ignores key issues.**

- No discussion of:
  - Aircraft deicing
  - Flooding problems
  - Nearby water supplies



- Failure to disclosure full impacts of VMP or other planned projects
- Significantly underestimates impacts on conservation and recreation land

# **HATS Environmental Subcommittee (HATS - ES)**

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**The Hanscom Area Towns Committee – HATS**  
**Bedford, Concord, Lexington & Lincoln**

**MISSION [M.G.L. c. 40 §4(I)] :**

***“To provide comment and review of any growth and development issue which has a significant impact upon the health, safety or welfare of citizens of more than one municipality”***

**HATS-Environmental Subcommittee:**

**Julian Bussgang & Richard Canale, Co-Chairs**



# Commercial Airline Passengers Mitigation Strategies at Hanscom

| Year        | Yearly Passengers                          |
|-------------|--|
| 1995        | 0  |
| 2001        | 134,337                                    |
| 2015 (ESPR) | <b>Up by a factor of 5!</b> <b>659,872</b> |
|             |  |

## RECOMMENDED MITIGATION:

- No Airport Terminal Development*
- No 60 seat Jet Airline Certification*
- No Additional Airline Certification*
- Introduce Parking Fees & Landing Fees*

# Cargo Airline Operations Mitigation Strategies

| Year        | Yearly Cargo Operations                         |
|-------------|---|
| 1997        | 0   |
| 2002        | 0   |
| 2015 (ESPR) | <b>If started, will grow even higher! 1,560</b> |
|             |   |

Exceeds 1,040 Cargo declared by SH&E to involve  
“Substantial Noise Impacts” (1995, p. 35)

## MITIGATION:

- No Cargo Hangar Development on the East Ramp
- No Cargo Airline Certification - Don't Petition FAA!
- No 'Phantom Road' Development

# Jet Operations Mitigation Strategies

| Year        | Hanscom Yearly Jet Operations             |
|-------------|---|
| 1992        | 8,105                                     |
| 2002        | 20,226                                    |
| 2015 (ESPR) | <b>Up by a factor of almost 7!</b> 54,961 |
|             |   |

## JET NOISE MITIGATION:

- No New Jet Hangar Development
- No Jet Hangar Expansion Leases
- Limit Growth of Time-share Jet Terminal Facilities
- Charge Business Jets Landing Fees
- Set Limits in the Leases on Allowed Activity
- Higher Aircraft Landing Fees (740 CMR 21.24)

# Night Operations Mitigation Strategies

| Year        | Approximate Hanscom Yearly<br>Night Operations |
|-------------|--|
| 1982        | 532  |
| 1994        | 734  |
| 2000        | 1,918  |
| 2015 (ESPR) | <b>Ten times 1994 Levels!</b> 7,545            |

## NIGHT NOISE MITIGATION:

- *Increase Night Time Fees*
- *Limit Leases to Time-share Jets*
- *No Hotel Development*
- *Enforce Engine Run-up Provisions*
- *Prohibit Nighttime Self-Propulsion*
- *Cut Back on Exempted Operations*

# Ground Traffic Mitigation Strategies

| Year             | Daily Airport Vehicle Traffic | Daily Parking |
|------------------|-------------------------------|---------------|
| 1997 (1995 GEIR) | 1,500                         | 763           |
| 2002 (ESPR)      | 2,800                         | 1,484         |
| 2015 (ESPR)      | Not Disclosed                 | Not Disclosed |
|                  |                               |               |

## GROUND TRAFFIC MITIGATION:

- *Stop Expanding Parking through Lessees*
- *Charge Significant Parking Fees*
- *Implement Transportation Demand Management*
- *Do Not Develop ‘Phantom’ Roads*
- *Regularly Monitor & Report Traffic Counts*

## **HATS ESPR Comments Recommendations**

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### **HATS recommends that MEPA:**

- Require Massport to revise its Draft ESPR to correct deficiencies
- Allow HATS the opportunity to review and comment on the next version of ESPR before it's finalized
- Re-emphasize that all Draft ESPR Scope requirements and other MEPA directives need to be adequately responded to in this next version of the 2000 ESPR.
- Consider revising the ESPR reporting frequency and threshold review requirements for Hanscom
- Continue/strengthen community workgroup concept for ongoing airport concerns



## **HATS ESPR Comments Recommendations**

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### **HATS recommends that MEPA require more discussion in the ESPR on planning/decision making.**

- Massport must specifically address the consistency of planning strategies with federal/regional/local plans
- Massport must clearly disclose its actual assumptions, vision, and plans for Hanscom Airport and must state whether its scenarios should or shouldn't happen.
- Massport must disclose what decisions it can control and what decisions it can't control and disclose what authority supercedes which decisions.
- Massport must explicitly state how it will use the information in the ESPR to develop plans to build/not-build infrastructure or seek/recommend/reject new/expanded certifications or services

## **HATS ESPR Comments Recommendations**

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### **HATS recommends that MEPA require Massport to revise its scenarios to provide a useful report.**

- Massport must include a lower bound scenario that is consistent with existing plans and use at a general aviation airport
- Massport should not be allowed to keep inappropriate scenarios in its report – if allowed to do so, they must include a worst case projection
- Massport must not be allowed to allocate traffic to new roads unless they provide more details about location, discuss potential impacts, and demonstrate the roads are feasible and likely to be built
- Massport must not be allowed to include hangar, terminal, or other infrastructure expansion unless they can link them to activity levels and environmental impact
- Massport must look at alternative scenarios and corresponding meaningful mitigation measures to avoid potential environment impacts from increasing

## **HATS ESPR Comments Recommendations**

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**HATS recommends that MEPA work with the communities and Massport to develop more appropriate reporting requirements and review thresholds.**

- Streamlined MEPA Regulations don't provide a formalized review for many activities that can cause significant environmental damage at Hanscom
- Provisions within MEPA Regulations allow for special review thresholds
- Airport location within the nationally significant historic area is analogous to an Area of Critical Environmental Concern and deserves the highest level of MEPA review

## **HATS ESPR Comments Recommendations**

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### **HATS recommends that MEPA:**

- Renew the Noise Workgroup Process and ask Massport for a higher degree of commitment
- Consider the establishment of an analogous workgroup for air quality issues