

# TOWN OF LINCOLN

## Lincoln Town Offices

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Jennifer Glass, Chair  
Jonathan Dwyer  
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**Select Board**

Alexander Strycky  
MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114  
Alexander.Strycky@mass.gov  
(857) 408-6957

February 10, 2023

Re: EEA #16654: L.G. Hanscom Field North Airfield Development ENF

Dear Mr. Strycky:

We are writing today to express our grave concerns regarding the potential environmental impacts and overall carbon emission increases that may occur if the plans contained in the Hanscom Field North Airfield Development ENF move forward. We believe that this expansion is in direct opposition to the ambitious climate goals we have set as a state, and that we are trying to meet on the local level. At a time when we should be investing in decarbonization strategies, this project is supporting intense fossil fuel usage that will benefit a few individuals with enough means to try to avoid the inconvenience of other modes of transportation.

The project is of particular concern to us for many reasons:

- Lincoln is responsible for the education of pre-K – 8<sup>th</sup> grade children living on Hanscom Airforce Base. We are concerned about the potential health impacts to our students and their families. The Hanscom Primary and Middle Schools and Base housing are located between 1.2 – 1.75 miles from the proposed site.
- We are concerned for the health of all our residents and those in neighboring towns. We underscore the fact that the 5-mile radius of the proposed project includes more than 30 census tracts identified as environmental justice neighborhoods. Within that area, for example, Battle Road Farm is a 120-unit development of which 48 units are income restricted.
- There is insufficient information both about current and future environmental impacts, and about the safety of a proposal that is adjacent to neighborhoods, schools, and a military base.

- The proposed project is adjacent to two Superfund sites, and there is insufficient information about the impacts of air traffic and the fuel farm on air quality and groundwater.

We respectfully request that MEPA review, and widen as necessary, the scope of information that you require the Proponent to provide during the upcoming Environmental Impact Report (EIR) to ensure that these potential environment impacts can be comprehensively and accurately assessed and quantified.

Specifically, we request the following:

1. Clarification on how this proposal adheres to and fulfills the goals of both the original Master Plan for Hanscom Field and the Metropolitan Area Planning Council's MetroCommon 2050 plan.
2. An analysis of the past 5 years of Hanscom air traffic and projected increases to air traffic that could potentially occur using the full capacity of the site if built as proposed.
3. A comparison of air traffic volume before and after the last comparable expansion of hangar space at Hanscom.
4. Data from the past 5 years on how many "ferry flights" currently occur, with what types of aircraft, and from which "home airport" those flights originate, as well as projections for the reduction in those figures if the expansion plans go forward.
5. Data on the extent to which "reverse ferry flights" occur currently, i.e., aircraft that are based at Hanscom and take-off or land empty to pick up or drop off passengers elsewhere; and will there be any restrictions on such "reverse ferry flights" for all the aircraft newly based at Hanscom if the expansion plan goes forward?
6. A comparison of the estimated emissions resulting from such "ferry flights" currently vs the emissions generated by the projected increase in air traffic enabled by the proposed expansion of facilities.
7. A breakdown on frequency of each flight path used by aircraft type and how this is projected to change with the proposed expansion plan.
8. An analysis of the past 5 years of noise levels and projections of noise levels if the expansion plan goes forward.
9. Clear articulation of the maximum size and weight of planes and the noise profile of the loudest planes that the proposed expansion plan would enable.
10. Specific details of the "fuel farm" described in the Proponent's public Zoom presentation on February 6, 2023, including estimates of the type and maximum number of gallons of fuel stored at the facility, the size and frequency of trucks that will supply such a fuel facility and what roads they will use to enter and exit the facility.
11. Specific emergency plans and firefighting techniques will be in place to handle spills and potential fires at the "fuel farm" facility or from trucks supplying the facility, and information about how that will comply with the Commonwealth's PFAS regulations.
12. An analysis of the scope and distance of impacts of potential events to the Airforce Base, the Hanscom Schools, and adjacent neighborhoods.
13. Details on how and where the Proponent plans to de-ice aircraft, what chemicals will be used, how runoff from the aircraft will be controlled after the aircraft has left the de-icing station, and what contingency plans will be in place to control and mitigate chemical spills.
14. Details on the experience of the Proponent in operating such a facility, and any related environmental records.

15. An analysis of the wildlife and vegetation that currently exists and the amount of carbon sequestration provided by the area to be developed.

In their cover letter to the ENF, the Proponent claims “the Project would result in environmental benefits associated with reduced air emissions by reducing overall aircraft trips”, but they have yet to provide any data or analysis supporting that claim. Given that the Proponent plans to add 495,470 square feet of space in the form of 27 new hangars and that the project could serve planes as large as Boeing 737s, we find it difficult to believe that overall air emissions would be reduced. Further, with the installation of a fuel field, and no firm commitment to install sufficient electrical infrastructure or PV array, the Proponent has made it clear they are committed to fossil fuel. As a result, we believe that this expansion would be completely contrary to the Commonwealth’s Clean Energy and Climate Plan for 2050.

Sincerely,

Lincoln Select Board

  
Jonathan Dwyer (Feb 10, 2023 20:19 PST)

Jonathan Dwyer

  
Jennifer Glass (Feb 10, 2023 21:22 EST)

Jennifer Glass, Chair

  
Jim Hutchinson (Feb 10, 2023 20:18 EST)

Jim Hutchinson

via email and USPS