

TOWN OF BEDFORD
BEDFORD, MASSACHUSETTS 01730



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SELECTMEN of BEDFORD

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10 Mudge Way
Bedford, MA 01730
781-275-1111

May 16, 2018

Richard Doucette
Environmental Program Manager
Federal Aviation Administration
1200 District Avenue
Burlington, Massachusetts 01803

Dear Mr. Doucette:

The Selectmen of the Town of Bedford, Massachusetts submit the following comments on the Draft Environmental Assessment entitled L.G. Hanscom Field Aviation Facility Improvements Project prepared by Massachusetts Port Authority and Epsilon Associates, Inc., dated April 13, 2018.

NOISE: The Town of Bedford is concerned about increased noise that would result from the operation of the proposed development. Residences, a softball field and outdoor soccer fields are located on Hartwell Road in Bedford abutting the project site. The Environmental Assessment (EA) at Section 5.8 analyzes projected noise levels solely on the basis of a 2012 Massport Environmental Status and Planning Report (ESPR). Projected noise contours for 2020 and 2030 are reported in the ESPR. But, page 7-44 of the ESPR notes that the predictions of future noise levels assume "no changes were made to the airfield layout...". Massport's proposed development would be located on a section of Hanscom field which has not been used for many years. The noise analysis in the EA and the 2012 ESPR did do not take into account the specific location and projected use of the proposed development. A meaningful analysis of the noise impacts of the project should be site specific rather than relying on old data which used a layout of the airport that did not include the proposed hangars and maintenance facilities.

Additionally, the EA makes the following questionable statement at page 5.7: "[W]ith projected growth in operations in 2020 and 2030 (independent of this project) there will be no residents within the 65dB contour and populations exposed to both the 65 and 55dB contour remain below actual 2005 levels". (emphasis added). This statement takes express exception for noise generated by the proposal. It also does not coincide with Table 7-25 of the ESPR which seems to show population units in Bedford would be exposed to 60 to 65 dB in all years examined. Furthermore, the comparison of future sound levels with 2005 sound levels is misleading. In 2005 the airport was used much more than it is now. The ESPR at page 7-51 shows that dB levels in 2005 were significantly higher than they were in 2012. Sound levels in 2012 are closer to what they are today. A more meaningful analysis would be to compare levels in 2012 (not 2005), to the projections for 2020 and 2030. Table 7-25 of the ESPR shows in that in comparison to 2012, more populations units will exposed to increased noise levels in 2020 and 2030.

Finally, Table 7-12 in the ESRP analyzes noise at specific locations in Bedford, but Hartwell Road is not among the locations analyzed. Massport's proposed project abuts Hartwell Road and the noise impacts at that road should be specifically considered in the EA.

Therefore, we request that the Federal Aviation Administration require Massport to assess the actual increase in noise levels that the nearby Bedford residents of Kendall Court, Hartwell Road and Bagley Avenue will experience from the present day (2018) levels to what they will experience post construction. We also request that Massport identify proposed mitigation for any increased noise in the area. Lastly, we request that this additional information from such an assessment be provided to the Bedford Selectmen for further review and comment.

AQUIFER PROTECTION: The project site is located approximately 2,400 feet from three Town owned wells. It is within the Aquifer Protection District established under Section 13.1 of the Bedford Zoning Bylaw. The purpose of the Aquifer Protection Bylaw is to protect public health by preventing contamination of the ground and surface water resources providing public water supply. Massport's proposed facilities would expose the aquifer to potential contamination from petroleum based products. But, the EA at page 5-13 only addresses aquifer protection very summarily.

The project developer must obtain a special permit from the Bedford Selectmen. The Bylaw directs the permit granting authority to give due consideration to the simplicity, reliability and feasibility of the control measures proposed and the degree of threat to groundwater quality which would result if the control measures failed.

TRAFFIC: The EA inadequately addresses traffic, especially during the construction phase of the project. Hartwell Road is a busy, narrow street which serves residences, recreational facilities, and businesses. Hours of construction should be restricted to 8 A.M. to 4 P.M. on weekdays to reasonably minimize the negative traffic effects on the neighborhood. The EA also does not address the permanent increase in traffic on Hartwell Road that will result from the construction of the new aviation facilities. We request that the Federal Aviation Administration require Massport to analyze and quantify the increased traffic on Hartwell Road resulting from the proposed development and suggest mitigation for these increases.

Thank you for your attention to this matter.

Very truly yours,



William S. Moonan
Chair Bedford Selectmen

Cc: Stewart Dalzell
Sharon Williams
Amber Goodspeed