



Friends of Woodlands and Waters

*Working with the United States Fish and Wildlife Service
And serving our local communities*

RE: EEA No. 16654 - L.G. Hanscom Field North Airfield Development, Bedford

Dear Mr. Strysky,

On behalf of Friends of Woodlands and Waters, a nonprofit 501(c)3 organization dedicated to supporting and protecting the Assabet River, Oxbow, and Great Meadows National Wildlife Refuges, I am writing in opposition to the proposed private jet expansion at Hanscom Field. We share the concerns of the U.S. Fish and Wildlife Service about the potential impacts to wildlife and people, traffic, noise and air pollution, within the Great Meadows Concord Unit, and in its vicinity.

From the Great Meadows NWR website*: "The Concord unit has excellent birding, and noted ornithologists consider this unit to be one of the best inland birding areas in the state." Local visitors, and those from far away, are drawn to the Great Meadows National Wildlife Refuge to enjoy hiking the trails, bird watching, nature photography, and observing the flora and fauna through the changing seasons. These quiet pursuits are already negatively impacted by the current regularity of loud aircraft sounds. To increase the number of jet flights over the Refuge would further saturate the environment with disturbing noise.

"Considering the impacts of noise pollution, researchers found that increased noise in forests meant songbirds nesting there laid fewer eggs and were less likely to successfully raise all of their chicks. Human-generated noise could be affecting male mating songs especially in forests where they tend to sing at lower pitches. The female birds could have more difficulty hearing male birdsongs through low-frequency human noise." ** As stated by Caren Cooper, associate professor in the North Carolina State University Department of Forestry and Environmental Resources, "For noise pollution, it's not just the volume; it's not just about it being noisy. There are anthropogenic noises that are known to have an effect on stress, sleep, circadian rhythms, ability to communicate-whether it's loud like a jet flying overhead, or soft like the hum of traffic."

Along with loud aircraft sounds, ultra fine particles are a health risk concern to people and wildlife. The ongoing Air Quality Study, conducted by Professor Neelakshi Hudda, Tufts University, about ultra fine particles should be included along with its results in a revised DEIR so that a baseline of current air quality can be established. This study has particular relevance to the Project as it is focused on ultrafine particles whose chemical signature is specifically associated with emissions from jet aviation fuel. The claims that "This project will eliminate

3,543 ferry flights, (empty flights), reduce overall flights, and produce zero GHG emissions" are based on flawed methodology which have been refuted by a [recently released detailed independent analysis](#). The report found that the project would eliminate only 132 ferry flights but would add about 6,000 more regular flights with a resulting approx.150,000 tons of GHG per year.

The Great Meadows NWR was established 80 years ago under the authority, in part, of the Migratory Bird Conservation Act, for use as an inviolate sanctuary, or for any other management purpose, for migratory birds. Bird strikes can be deadly and injurious to both birds and pilots, as well as people and wildlife on the ground. Hanscom Field runways 11-29 are used for flights that pass directly over the Great Meadows Concord Unit impoundments. As far back as 1990, "according to the U.S. Department of Agriculture and the FAA, which monitor wildlife hazards to aviation, there were 1,759 reported bird strikes to civil aircraft. In 2007 there were 7,666 - a fourfold increase. Some of that can be attributed to better reporting by pilots and mechanics, and the FAA estimate that only 20 percent of all strikes are reported."*** Collisions with cockpit windows, aircraft wings, and engines can be catastrophic, as well as disturbing to pilots in the air who cannot readily assess and communicate the damage to the aircraft while navigating. Increasing the number of flights will greatly increase these risks, especially during migration, when large numbers of bird species fly in, around and out of the Refuge habitat areas, at both low and high altitudes.

For the sake of all wildlife, in particular migratory birds, people and the natural environment on which all rely, it is necessary to redo the DEIR to address false claims and omissions in the report. Due to lack of consideration for all related consequences, it is time to change direction and reject this DEIR for its complete failure to show the effect of increased private luxury jet flights. To our knowledge, Hanscom Field is the only airport which directly abuts a National Historic Park and a National Wildlife Refuge; given this fact, all efforts should be made to protect these national resources from unnecessary and harmful environmental impacts.

Sincerely,

Paula Goodwin, President
Friends of Woodlands and Waters

*Great Meadows NWR website: <https://www.fws.gov/refuge/great-meadows>

**"Noise and Light Pollution Impact Songbird Reproduction", *Nature*, November 11,2020: Press release, Laura Oleniacz, NC State News Services : <https://news.ncsu.edu/2020/11/noise-and-light-pollution-impact-songbird-reproduction/>

*** *Audubon Magazine*, May-June 2009: "<https://www.audubon.org/magazine/may-june-2009/making-airspace-birds-and-planes>