



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

June 24, 2024

Richard Doucette
Federal Aviation Administration
12 New England Executive Park
Burlington, MA 01803

RE: L.G. Hanscom Field North Airfield Development, 154 Hartwell Road, Bedford, MA;
MHC# RC.72722, EEA# 16654

Dear Mr. Doucette:

Staff of the Massachusetts Historical Commission (MHC) have recently reviewed the Massachusetts Environmental Policy Act (MEPA) Draft Environmental Impact Report (DEIR) that was submitted to our office.

The proposed project has been modified since the previous Environmental Notification Form (ENF) was submitted. The proposed project now consists of the construction of up to 17 new hangars plus the renovation of the existing Navy Hangar building, as well as site upgrades and site access improvements (both for vehicles and aircrafts). The proposed project area is located within the northern area of Hanscom Field, referred to as the "North Airfield."

The project will require approvals from the Federal Aviation Administration (FAA) for the Land Transfer and modification of the Airport Layout Plan and is therefore subject to Section 106 of the National Historic Preservation Act (36 CFR 800).

The project area is located to the north of the Minute Man National Historical Park, which is a National Historic Landmark and listed in the National Register of Historic Places.

The MHC looks forward to consulting with the FAA for the purposes of Section 106 of the National Historic Preservation Act. The MHC looks forward to the FAA's proposed approach for defining the area of potential effects (APE) of the proposed project. An *area of potential effects* is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties..." (36 CFR 800.16(d)). The DEIR submitted only studies the immediate area surrounding the project site. The FAA should consider the projected increase in flights and its associated vehicular traffic to define the APE to include an area that will be impacted by potential visual, atmospheric, and audible elements in association with the expansion of Hanscom Field. Any areas that will be introduced to new visual, atmospheric, or audible (noise levels) elements should be considered part of the APE by FAA. Please submit a map and description of the proposed APE, when available, to the MHC for review and comment (800.4 and 800.16(d)).

The MHC also looks forward to the FAA's identification of historic resources within the APE and your finding of effect, as part of the FAA's initiation of the Section 106 process.

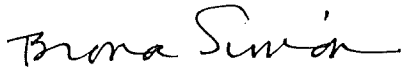
The FAA is also responsible for the identification of interested parties. The DEIR listed the Town of Bedford as a consulting party. It should be noted that the National Park Service Minute Man National Historic Park and the Concord Local Historical Commission have requested to be a consulting party. Additionally, the National Trust for Historic Preservation should be noticed as a consulting party. The MHC looks forward to reviewing a list of the interested and consulting parties provided by the FAA.

The rehabilitation of the Raytheon Flight Test Facility (Navy Hangar) is also a part of the proposed project. The U.S. Navy found that the Navy Hangar meets the criteria for eligibility for listing on the National Register of Historic Places on July 29, 2016. The MHC concurred with the Navy's finding on August 18, 2016. Since the building is historically significant and the proposed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation, the project is eligible to receive Massachusetts Historic Rehabilitation Tax Credits. The Massachusetts Historic Rehabilitation Tax Credit is administered as a separate program under Massachusetts Regulations 830 CMR 63.38R.1: Massachusetts Historic Rehabilitation Tax Credit Corporate Excise.

Staff of the MHC have reviewed the results of the archaeological survey that was conducted for the proposed project. A total of thirty shovel test pits were excavated in the project's direct impact areas. No pre-Contact or post-Contact archaeological resources were discovered. No further archaeological investigation is recommended.

Please note that these comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act (36 CFR 800), M.G.L. Chapter 9, sections 26-27C, (950 CMR 71.00) and MEPA (301 CMR 11), and do not serve as comments or approval regarding submissions for State or Federal Historic Rehabilitation Tax Credits. MHC's comments regarding the historic rehabilitation tax credit applications are submitted separately under those program regulations. Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
State Archaeologist
Massachusetts Historical Commission

xc: Michael Argiros, Runway Ventures, LLC/North Airfield Ventures, LLC
Judith Walker, FPO - FAA
Simone Monteleone, Minute Man National Historical Park
Jamie Loichinger, ACHP
Mark Eberle, NPS – Philadelphia
Stuart Dalzell, Massport
Betsy Merritt, National Trust for Historic Preservation
Bedford Historical Commission
Concord Historical Commission
Lincoln Historical Commission
Lexington Historical Commission
Neil Rasmussen, Save Our Heritage
Alissa Augestein, PAL