



November 6, 2015

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
MEPA Office  
100 Cambridge Street, Ste 900  
Boston, MA 02114

Attn: Ann Canaday, EEA No. 3247

Re: Boston-Logan International Airport 2014 Environmental Data Report, EOE  
#3247

Dear Secretary Beaton,

On behalf of The Boston Harbor Association, thank you for the opportunity to comment on the Boston-Logan 2014 Environmental Data Report submitted on October 7, 2015.

In reviewing the Environmental Data Report EDR, the Boston Harbor Association focused on specific issues of interest including impacts on the local community, climate change preparedness, climate change mitigation, effects of deicing procedures, and potential snow dumping into Boston Harbor. Our staff was present during the consultation session held on October 20, 2015 at which time both Massport and its partners responded to questions and comments presented by TBHA staff. Our comments follow:

**Airport Planning**

Logan Airport has been one of the fastest growing major U.S airports over the last four years. The airport serves as a major domestic origin and destination market and acts as the primary international gateway for the New England region. In the short term, Logan is projected to reach 32.9 million passengers this year and 34 million in 2016.

*Terminal E Enhancements and Modernization Project.*

Massport plans to extend the existing International Terminal E to include 4-6 additional gates in an extended concourse, new passenger handling and hold rooms, as well as potential Border Patrol facilities. This modernization project was initially part of the

International Gateway West Concourse Project, which was granted a license in 1996 but never constructed due to a decreased demand for air travel following September 11 attacks.

The facility will function as a noise barrier, with the key feature of creating the first direct pedestrian connection from the MBTA Blue Line Airport Station to the terminal complex at Logan Airport. We strongly support providing easier, more direct public transportation routes to the airport to encourage passengers to consider these options when traveling to Logan, therefore minimizing the harmful automobile emissions and traffic congestions to nearby communities. We are in receipt of Massport's Environmental Notification Form for the modernization of Terminal E and look forward to conducting a more detailed review of the proposal.

*Buffer Areas/Open Spaces.* We applaud Massport's efforts to construct and maintain open spaces and airport buffer areas. The newly created nearly 2-acre Neptune Road Edge Area Buffer located between the MBTA Blue line and Bennington Street provides a natural escape for the surrounding community. For many years, East Boston had one of the lowest percentages of open space of any neighborhood in the city; this buffer area adds to the green spaces already created by Massport and will serve to recognize the historic significance of Neptune Road and its residents who fought to protect the neighborhood.

In August, local residents celebrated the opening of the new Logan Square Dog Park. The park contains various dog-friendly features, including a paved dog run, an exercise ramp, and water fountains. Dog parks provide safe places for both animals and people to interact.

We encourage Massport to continue working with local residents and advocates to ensure that the open spaces and buffer areas provide meaningful, high-quality spaces that benefit surrounding neighborhoods. Undoubtedly, Logan Airport operations have a negative impact on East Boston in terms of traffic congestion, noise, and air quality; we are highly supportive of all efforts Massport engages in to increase benefits to the East Boston community including but not limited to increased open spaces, better programming of open areas, enhanced Harborwalk sections, and innovative public amenities.

### **Transportation**

Passenger traffic at New England airports in 2014 represented the highest passenger traffic level for the region since 2008. The increase was largely driven by continued

growth at Logan Airport with a total number of air passengers increasing to 31.6 million annual air passengers in 2014. Even though passenger activity levels have increased, aircraft operations have actually decreased in the past year.

International passenger traffic at Logan Airport has continued to grow over the past several years and demand is projected to increase at a faster rate than domestic passenger demand. In 2014, international annual numbers increased from 4.4 million to 4.9 million. TBHA suggests surveying international passenger ground transportation preferences to see how the use of shared rides and public transportation can be optimized for this growing group of travelers.

*Ground Access to and from Logan Airport.* With increasing air travelers and continuation of the Massport parking freeze, pick up/drop off vehicle trips have gradually ticked up. We concur with Massport's assertion that this is the least desirable mode of transportation as more vehicle trips translate to increased vehicle miles traveled and attendant emissions. Because this mode of travel generates up to four vehicle trips per air passenger, increased pick up/drop off activity has the opposite effect of what the Logan Airport Parking Freeze regulation was initially intended to achieve.

We understand Massport has considered revisiting the terms of the parking freeze to alleviate increased automobile emissions affecting air quality both locally and regionally. TBHA is open to working with Massport on alternative modes of transit and continues to strongly support increasingly innovative transportation alternatives.

We commend Massport for their efforts to encourage public transit use by continuing the pilot program for free access to the Silver Line at Logan Airport. We recommend making this a permanent program and increasing the fleet size to further alleviate automobile use to and from Logan. The Back Bay Logan Express service initiated in 2014 continues to gain popularity, providing three scheduled trips per hour between the Hynes Convention Center, Copley Square Station, and Logan Airport. We encourage Massport to monitor use and enhance public awareness of this express service.

*Water Transportation to and from Logan Airport.* Annual ridership and activity levels for water transportation on MBTA ferry is not available in the current EDR. (Table 5-8, Environmental Data Report). We would like to see a more detailed survey of MBTA ferry use. The EDR states that in the 2013 ground access survey, water transportation accounted for less than 1% of the mode share to Logan Airport. (2013 Logan Airport Air Passenger Ground Access Survey). We commend Massport for the courtesy shuttle bus service between the Logan dock, the MBTA Airport station, and all terminals as well as

the employee subsidy for those that commute by ferry. We believe this is a great initiative and strongly encourage Massport to work together with MBTA officials to generate additional price motivators and to significantly increase the in-terminal marketing of water transportation. Finally, we urge Massport to not only maintain the current ferry schedule but to also expand off-peak services. We believe a more robust water transportation system is a great opportunity to better serve passengers--and highlight the beauty of the city--between downtown and Logan.

We understand planning for passenger access is a key issue for Massport moving forward. Massport should continue to address airport-wide planning efforts to create a better balance of HOV/transit/shared-ride alternatives, on-site parking, reduced pick up/drop off trips, and a significantly more robust water transportation system. We look forward to seeing Massport progress towards achieving this balance using the data collected via its upgraded Automated Traffic Monitoring Systems (ATMS).

### **Water Quality/Environmental Compliance**

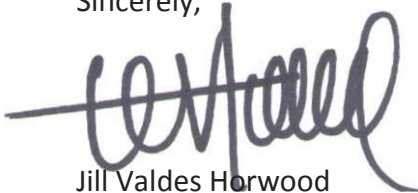
Resiliency. Much of Massport's critical infrastructure is in relatively low-lying coastal areas. We commend Massport for beginning to plan and prepare for the impacts of sea level rise, storm surges, and other climate-related threats. In 2014, Massport released The Disaster and Infrastructure Resiliency Planning Study (DIRP) which included a hazard analysis, modeling sea-level rise and storm surge, projections of temperature/precipitation, and anticipated increases in extreme weather events; this study provides recommendations for short-term adaptation strategies to make Massport's facilities more resilient to likely effects of climate change. Massport has also launched a public website which contains a variety of graphics and descriptions of adaptation and sustainability efforts. We highly encourage Massport to not only study the past effects of climate change but to be forward-thinking in construction and mitigation efforts to prevent the harmful impacts of sea level rise and other climate change related events.

Snow Removal and Dumping Plan. With another cold and snowy winter predicted for the New England region, we ask that Massport consider distributing a detailed snow removal and dumping plan to interested advocates and members of the public. At the public consultation session held on October 20th, Massport staff indicated that the snow removal plan remains unchanged from the previous calendar year and any snow dumped directly into the Boston Harbor would be strictly from runways with little to no debris. Our concern is that with expected increased snowfall and overflowing snow farms, Logan may once again consider the unwanted alternative of dumping snow into Boston Harbor.

Massport staff indicated that deicing procedures for the new larger aircrafts occur mainly in the center of the airport at the gates and not near the water, with the exception of one area near the end of the east runway. The current EDR does not include a list of chemicals used in the deicing process. Moreover, while our staff was able to find stormwater testing results as recent as September 2015, we were unable to locate the results of recent stormwater testing for deicing chemicals on the Massport website. TBHA remains uncertain of the toxicity level of the deicing chemicals and requests that Massport provide more recent test sample results for deicing chemicals in the stormwater system, specifically of the north and west outfalls which directly drain to the adjacent Harbor. Finally, we encourage Massport to continue deicing procedures a safe distance away from the harbor to minimize potential runoff and contamination of the water and marine life.

Thank you again for the opportunity to comment.

Sincerely,



Jill Valdes Horwood  
Waterfront Policy Analyst



Julie Wormser  
Executive Director