



December 9, 2015

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

Attn: Page Czepiga, EEA

Re: Boston-Logan International Airport Terminal E Modernization Project

Dear Secretary Beaton,

On behalf of The Boston Harbor Association, thank you for the opportunity to comment on the Boston-Logan International Airport Terminal E Modernization Project Environmental Notification Form submitted on November 2, 2015.

As of 2014, Logan International Airport's Terminal E served 4.9 million international passengers. Demand is currently projected to increase to 6 million passengers by 2022. To accommodate this demand, the Terminal E modernization project will add between five and seven gates, passenger holdrooms, concourses, concessions, and passenger processing areas. The additions and enhancements will add 500,000-700,000 square feet in terminal structures for a total area of approximately 799,000 square feet. The project is divided into two phases with an expected completion date of 2017.

We understand Massport plans to conduct a comprehensive environmental assessment as requested by the Federal Aviation Administration and required under the National Environmental Policy Act.

We would like the NEPA Environmental Assessment to include the following:

- Opportunities for decreased energy use by connecting Terminal E with water transportation as well as land-based transit.
- Mitigation of community impacts from Terminal E enhancements and daily airport operations through on-going subsidies for new and enhanced water transportation serving East Boston, Winthrop and other inner harbor destinations.
- Measures to ensure that terminal E enhancements are climate resilient, including able to withstand salt-water inundation without system failures (e.g. unwanted toxic discharge of toxins such as jet fuel into Boston Harbor).

Our comments on the Environmental Notification Form follow.

Existing Conditions

Under existing conditions, if there are no available gates, international aircrafts landing at Logan Airport are redirected to the North Cargo Area to let passengers deplane via mobile stairs. Aircraft idling and North Cargo Area drop-offs encourage inefficient use of energy and create additional noise disturbances to the adjacent community (e.g. busing to and from terminal, engine idling noise, and using aircraft engines to provide electricity to cabins). In its present configuration, the North Cargo area is closer to the East Boston neighborhood than the existing terminal and does not include a noise barrier. More frequent and increased international deplaning procedures would imply additional disturbances to the surrounding residents of East Boston.

For this reason, we support the modernization of Terminal E to efficiently accommodate passenger demands, minimize ongoing disturbances to the adjacent community, enhance access roadways and curbs, and act as a noise barrier for the adjacent neighborhood and Memorial Stadium Park.

Transportation

The terminal E modernization project will create the first direct passenger connection from MBTA Blue Line Airport Station to Terminal E. TBHA strongly supports Massport's efforts to actively support public transit usage. We are especially supportive of the free inbound Silver Line service from Logan and the robust "Logan Express" bus system, including the "Logan Express" service connecting visitors and residents in the Back Bay with convenient service to the airport.

The anticipated growth in international travel, the main focus of this project, will require additional and more effective means to move millions more passengers each year. We know Massport will work with adjacent communities to develop mitigation efforts that directly address increased visitation to Logan International.

It is essential for Massport to evaluate the benefits of water transportation to both address and enhance travel options for passengers and residents. This is beneficial not only for incoming travelers but also for homecoming residents. Indeed, Massport should consider enhancing Boston Harbor's water transportation system as the primary mitigation measure of this and future airport enhancements. This might range from ADA-compliant landside facilities to subsidized routes to Winthrop, East Boston and other inner harbor destinations. Investing in a more robust water transportation system is an ideal opportunity to better serve residents and visitors and highlight Boston's harbor and waterfront renaissance.

We commend Massport for its continued commitment to the improvement of public transportation access to and from Logan Airport. We look forward to reviewing a more detailed breakdown of the operation and management of the new public transportation initiatives planned for Terminal E and the first direct passenger connection to the MBTA Blue Line Station.

Construction Mitigation

During construction, Massport does not anticipate off-airport impacts or relocations. As proposed, all impacted facilities will be replaced or relocated to other on-airport locations. This is welcome news for residents of East Boston who continue to feel the immediate negative impacts of daily airport operations.

We ask that best practices be implemented to minimize construction impacts to the East Boston community during both Phase I and II of construction. Depending on the anticipated construction activities, increased traffic is likely both in size and frequency of vehicles entering and leaving the site. We expect that delivery of construction materials will also affect the amount of trucks traveling through the surrounding community. We ask that Massport consider a comprehensive traffic plan to minimize traffic flow interference from construction activities (e.g. advanced public notice of road closures and shifting operations affecting traffic to off-peak hours).

Thank you again for the opportunity to comment. We look forward to reviewing the results of Massport's environmental assessment requested by the Federal Aviation Administration and required under the National Environmental Policy Act.

Sincerely,



Jill Valdes Horwood
Waterfront Policy Analyst



Julie Wormser
Executive Director