



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON, MA 02133-1054

ADRIAN C. MADARO
REPRESENTATIVE
1ST SUFFOLK DISTRICT
ROOM 134
TEL: (617) 722-2400
FAX: (617) 722-2850

Adrian.Madaro@MAhouse.gov

VICE CHAIR:
TRANSPORTATION

POST AUDIT AND OVERSIGHT
CONSUMER PROTECTION AND
PROFESSIONAL LICENSURE

November 20, 2019

The Honorable Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attn: Anne Canaday, EEA 3247
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: Boston Logan International Airport 2017 Environmental Status and Planning Report - EEA #3247

Dear Secretary Theoharides:

I write to express my concerns about the Logan International Airport Environmental Status and Planning Report (EEA 3247, ESPR 2017), as submitted. Upon careful review of ESPR 2017, it is evident that many of the forecasts contained within the document, particularly projected passenger and aircraft activity growth, are implausibly low and out of step with actual measurements in recent years. Massport has chronically underestimated projected growth rates during a period of rapid expansion. This has deprived the community of the opportunity to meaningfully review the full extent of potential environmental impacts at Logan Airport and, critically, resulted in inadequate planning, infrastructure, and mitigation to offset the true effects of rapid expansion. ESPR 2017 must be updated to reflect a more accurate projection of growth in operations, along with a corresponding plan to provide adequate mitigation in surrounding areas for the associated impacts.

Massport has forecasted passenger growth levels in ESPR 2017 to be 1.5%, with aircraft operations growth forecasted at 1.2%. These figures appear to be unreasonably low estimate given current trends at Logan Airport. Over the previous five years, passenger growth averaged 5.6%, with aircraft operations growth averaging around 1.5%. ESPR 2011 predicted that airport passenger volumes would reach about 33 million by 2019, but instead we are on pace to see almost 43 million passengers this year, 10 million passengers over the estimate. This is an increase from 26.5 million passengers in 1998, an additional 16.5 million passengers in a little under 20 years, representing a 62% increase. This growth is far greater than what was presented to the community in any reporting by Massport during this time period. Additionally, Massport's projected growth rates are out of sync with both their own Future Planning Horizon forecast as well as the Federal Aviation Administration's Terminal Area Forecast estimates. There is currently no credible evidence that Logan Airport growth will suddenly slow within

the next several years, in light of historic data, regional trends, or current plans for expansion by airlines and Massport alike.

Environmental impacts resulting from this growth have also correspondingly increased during this time frame. Estimates in the ESPR reveal that residents exposed to 65 day-night average sound level (DNL) or higher, which are the populations most impacted by airport noise across the region, have doubled, going from 3,947 in 2011 to 7,943 in 2017. This noise increase has been exclusively concentrated in East Boston, with the exception of a small section of Chelsea, even as noise levels in some other areas have reduced. In East Boston, the number of residents exposed to 65 DNL have astoundingly risen over 1300%, from 331 residents in 2011 to 4,734 in 2017. ESPR 2017 also reports that nighttime operations at the airport have increased by about 43% over six years, from 117.1 modelled operations in 2010 to 167.6 in 2017. Such nighttime operations may cause health issues for residents in neighboring communities, contributing to problems associated with sleep interruption, hypertension, and some neurological disorders. Levels of nitrogen oxides (NO_x), a key predictor of respiratory illness, have increased by 46% in five years, from 4,077 kg per day in 2011 to 5,935 kg per day in 2017. In addition, average weekday traffic associated with the airport has grown by almost 25% since the last ESPR report, from 104,863 trips in 2011 to 130,601 in 2017. We also know that 2018 alone saw the addition of 12 million new transit network company (TNC) rides to and from Logan Airport, with 5 million of those rides being dead-head trips with no passengers. These increases in environmental impacts can be directly related to the growth of Logan Airport operations and passenger levels during this time frame.

A direct consequence of the continued underestimation of growth in Massport's environmental disclosure documents is the failure to provide adequate solutions to issues associated with expansion and appropriate mitigation to deal with increased impacts such as those described above. Because these documents chronically underestimate forecasted growth, we have failed to advance viable solutions to transportation issues associated with airport passenger access and measures to mitigate the effects of noise and pollution. Had these forecasts more accurately estimated the growth we have seen in recent years, a more rigorous transportation plan could have been put in place to head off our current transportation challenges in the region, and more robust noise abatement measures and air quality programs implemented to protect the health and wellbeing of neighboring communities. Now, however, we are forced to play catch-up.

The consequences of unmitigated airport growth have had serious effects. Traffic to and from Logan Airport is a major contributor to the current regional transportation crisis in and around East Boston. Our transit system cannot function efficiently without additional investment, and planning and investment that accurately account for growth at Logan Airport cannot be implemented when forecasts are repeatedly a fraction of the actual increases. As we pursue solutions to these congestion issues, it is essential that we have accurate estimates of Logan Airport growth so that these increases can be accounted for in planning the future of our transportation system.

A number of long-term transit infrastructure improvements would be beneficial to decreasing the traffic footprint caused by Logan Airport, and its subsequent burdens both on Logan's passengers and the region as a whole. Investments to the Blue Line, including signal upgrades and the construction of the Red Line-Blue Line connector, would allow for increased capacity and frequency going toward downtown, as well as providing a direct connection to important economic corridors along the Red Line. Construction of a Silver Line Underpass at D Street would allow the Silver Line to operate more efficiently and bypass some of the traffic issues it currently faces. The ESPR would also be enhanced by further discussion and analysis of the impacts of high-speed rail and water transportation projects, as well as airport regionalization strategies and the potential effects of airport ground access fees. These projects, while important, are not presently considered under the ESPR. While this infrastructure is not solely the responsibility of Massport, these forms of transit serve or would serve significant numbers of Logan Airport passengers, and increasing their capacity and efficiency is vital to improving transit to and from the airport. Massport cannot continue to look only at on-campus solutions to transit issues exacerbated by Logan operations, which have permeated well beyond the confines of their borders. Massport should examine how they can contribute to the realization of these regional improvements in conjunction with MassDOT, the MBTA, and other relevant stakeholders.

While long-term improvements will take time to design and construct, there are many other infrastructure and operational improvements that can be achieved in a much shorter time frame. The recent reconfiguration of pick-up and drop-off facilities for TNCs at Logan Airport is a good first step toward making the rideshare system more efficient and reducing deadhead trips. Massport should continue to monitor and make improvements to this system to ensure that TNC ridership operates with the greatest possible efficiency and minimal impacts. Overall, however, the greatest improvements will be to get passengers out of TNCs and into high occupancy vehicles.

Improvements to Logan Express service offer the greatest potential to reduce traffic impacts associated with Logan Airport. By increasing the frequency, availability, and affordability of Logan Express, Massport can make the service more attractive to passengers, reducing customer reliability on private vehicles and TNCs. Increased frequency and availability makes Logan Express more accessible, and increasing its visibility shows travellers its potential as a viable and attractive transit option. Additionally, with more dedicated bus lanes, it would be seen as a faster alternative to traffic-burdened TNCs, especially for travellers who are concerned with making their flight on time. Massport can also make Logan Express easier to use by developing shuttle terminus locations that provide more comprehensive services off-site, such as airline and rental car services, remote baggage check, low-cost on-site parking facilities, and prioritized curbside passenger pick-up and drop-off areas. Expanding the number of shuttle locations and providing increased services would decentralize operations and reduce vehicle traffic from the congested surroundings of Logan Airport. Massport should seriously consider implementation of these various measures in order to address ongoing issues.

Worsening air pollution and noise exposure which has resulted from expansion is also of great import, as is the inadequate acknowledgement and mitigation of the associated health consequences. Aircraft and ground support activity necessary to increase passenger volumes far beyond forecasted levels has created significant escalation in noise and pollution, which carry serious public health implications. Massport should take responsibility for increasing noise abatement and pollution control measures to a magnitude at least equal to that of current and planned expansions. Updating the Preferential Runway Advisory System (PRAS) is essential to regional noise mitigation, and would be an effective component of this document's evaluation. Additionally, decreasing the impact of nighttime flights by diverting activity to overwater air traffic corridors should be vigorously pursued. Massport should also explore all legal and logistical pathways to imposing increased landing fees on nighttime flights. Schools within the 60 DNL contour, and within the 65 DNL contour in particular, should receive increased soundproofing assistance in order to protect from the exceptional amount of excess noise pollution caused by aircraft operations. It is critical that the widespread effects of noise pollution are thoroughly mitigated as noise contours continue to adjust and, in places like East Boston, intensify in densely populated areas.

Increased ground access and airfield activity are also responsible for rising emissions of pollutants such as NO_x, ultrafine particulates, and other gases and particulate matter. The health impacts of such pollutants are a serious issue with substantial public health impacts for communities surrounding Logan Airport. It is of vital importance that Massport take steps to mitigate these harmful emissions directly and effectively. One significant way to mitigate such pollutants would be air filtration projects for schools, community spaces, and residential homes in the most significantly-impacted areas. Moreover, the level of mitigation should account for not only the significant gap between Massport's previous estimates and current reality, but also the likely emissions resulting from a more accurate, realistic projection of future growth.

The consequences of past underestimations in forecasted growth contained in the ESPR have manifested in significant increases in adverse impacts on surrounding communities to Logan Airport. These existing impacts should be fully documented, analyzed, and mitigated under the environmental review process currently underway. Massport has a responsibility to address and fully account for the full range of impacts resulting from airport growth.

Sometimes the modelling just gets it wrong. This is a reality of formulating projections. However, when various models are consistently, repeatedly underestimating impacts by a significant margin, whether they be passenger

level estimates, traffic estimates, or pollution estimates, this becomes an issue. Modelling that systematically underestimates leaves communities systematically underprepared to deal with the impacts. Neighboring communities are saddled with unfair burdens and insufficient mitigation. This level of airport growth and environmental degradation speaks to a need for an enhanced level of response and mitigation from what was offered in ESPR 2017. Mitigation based on projections that have fallen short of reality have similarly fallen short of providing the necessary offsets for our communities. We can and must do better for the residents of my district and that of other neighborhoods, cities, and towns surrounding Logan Airport.

I respectfully request that the Executive Office of Energy and Environmental Affairs require Massport to provide a revised description and analysis of the potential increases in passenger and aircraft operational levels in a Supplemental High Growth Scenario which incorporates more accurate growth rates over the next five years for passenger and aircraft activity levels, in line with recent trends at Logan Airport. These forecasts should be accompanied by Revised Impact Projections, which similarly describe and analyze future noise, emissions, and traffic burdens in a more realistic manner. Massport should subsequently adjust mitigation implementation commitments to proactively address the future environmental implication of these scenarios to accurately alleviate conditions in already burdened environmental justice communities. These changes will lead to a more robust and more accurate final report on the growth of Logan International Airport.

Thank you for the opportunity to comment on this matter. Over one hundred of my constituents in East Boston have shared their concerns about the shortcomings of ESPR 2017, and I am aware that other elected officials across Greater Boston have received similar outreach from their constituents. This level of public engagement in the ESPR is the largest we have seen in years, and underscores just how serious these impacts have been. I am confident that the Executive Office of Energy and Environmental Affairs will recognize the importance of requiring common-sense adjustments in this critical planning document. Please do not hesitate to contact me should you have any questions.

Sincerely,



Adrian C. Madaro
Representative
1st Suffolk District