

Glenn Keith, MassDEP  
One Winter Street, Boston, MA 02108  
[DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us)

To Whom It May Concern:

I am writing to encourage the approval of the amendment to the Logan Airport Parking Freeze and build more commercial parking at Logan Airport. While when I am able to I opt to take public transportation, there are times when driving to the airport is necessary. However, it is often difficult to find adequate parking, which causes me to drive around looking for a spot.

Logan Airport served a record 36 million passengers in 2016. Without adequate parking, there will be an increase in emissions due to what many passengers have experienced: driving around looking for parking or being diverted to overflow parking areas. Furthermore, a shortage of parking leads to an increased number of people driving friends and family to the airport, which results in four vehicle trips instead of two associated with parking. What seems to be a very common occurrence is that people drive to and from the airport to drop their family or friends off and then return home, and then again drive to and from the airport when they return—also idling while waiting to pick them up.

Although I have heard that Logan has one of the highest rates of passengers using public transit and other HOV options, there are instances where travelers need to park instead, and they should be able to do that. Massport has made various investments to reduce emissions, from creation, support and promotion of HOV modes to a consolidated Rental Car Center bus fleet with new, fuel-efficient buses.

Those efforts, coupled with the fact that additional parking will decrease the amount of emissions and circulation at the airport and on local roads, is why I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces.

Sincerely,

Mary Ahmad  
Essex St, Charlestown, MA 02129

**From:** Jessica Apel [<mailto:jessicamapel@gmail.com>]

**Sent:** Monday, May 08, 2017 2:53 PM

**To:** Talks, DEP (DEP)

**Subject:** 310 CMR 7.30 Massport/Logan Airport Parking Freeze

Name & Citation of Regulation(s): 310 CMR 7.30 Massport/Logan Airport Parking Freeze

Patricia D'Amore

Exec. Asst, AIR, Inc.

Clerk, EB Greenway Council

Patricia D'Amore,

Publicity on this matter has been abysmal. There are many other, smarter ways to increase access to the airport without inviting an additional 5,000 cars through the tunnel, polluting our air and congesting our roads, each day. Please consider other options before going ahead with lifting this parking freeze.

Thank you,  
Jessica Apel

--

Jessica Apel

[jessicamapel@gmail.com](mailto:jessicamapel@gmail.com)



MASSACHUSETTS  
**HIGHTECHNOLOGYCOUNCIL**

*Dedicated to Growth... Committed to Action*

May 5, 2017

Glenn Keith  
Deputy Director  
Division of Air and Climate Programs  
Attn: MEPA Office  
EEA No. 15665  
One Winter Street, 7<sup>th</sup> Floor  
Boston MA 02108

Dear Deputy Director Keith:

On behalf of the Massachusetts High Technology Council, I am writing to express support for Massport's request to amend the Logan Airport Parking Freeze to add 5,000 parking spaces at the airport. The current situation – where the ability to park at the airport is so uncertain – results in poor customer experience, lost time, potentially missed flights as well as a decrease in air quality. Logan Airport is an essential economic engine for the region, and it needs the capacity in its facilities to meet its customers' needs as efficiently as possible with minimal impact on the environment and surrounding neighborhoods.

The Massachusetts High Technology Council has represented leading employers from our state's technology and innovation economy for nearly four decades. World-class air transportation infrastructure enables our members to access national and international markets and commercial centers and is essential to our members' ability to compete globally and grow their businesses and workforce here in the Commonwealth.

If a garage parking spot at Logan is not available, which happens frequently throughout the year, then one is forced to leave one's keys with an attendant, who then parks the car at a different location. Or, one must drive around trying to find parking somewhere else. This creates needless circulation which contributes to emissions and brings vehicles closer to residential neighborhoods, and certainly increases the likelihood of missing a flight because of the added time from being diverted and then shuttled back to the terminal from a remote lot.

We have observed that Massport has done an exceptional job leveraging innovative transportation technologies and investing in alternative modes for accessing the airport, and many of our members take advantage of the subsidized services of the Silver Line and Logan Express, resulting in a best-in-

nation HOV mode share. However, there are still many circumstances where these services are not available or accessible for our members traveling via Logan.

It is our understanding that Logan Airport is the only airport in the United States that operates under a parking freeze. The original goal of the freeze to reduce carbon monoxide emissions was a worthy one. After decades of technological improvement, emissions overall are down. It appears that raising the cap on the freeze at this time would reduce the number of vehicle trips and further reduce emissions, while providing a much needed solution to Logan's persistent parking challenge.

To address current constraints and accommodate future passenger growth, Massport is proposing a measured increase in its on-airport parking as a component of their broader goals of customer service and community and environmental stewardship. We fully support this effort and encourage you to do the same.

Sincerely,



Christopher R. Anderson

President



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100  
Boston, MA 02109-3912

April 11, 2017

Glenn Keith  
Deputy Director, Division of Air and Climate Programs  
Bureau of Waste Prevention, MassDEP  
1 Winter Street, 7<sup>th</sup> Floor  
Boston, MA 02108

Dear Mr. Keith:

Thank you for the opportunity to provide comment on your proposed amendments to 310 CMR 7.30 "Massport/Logan Airport Parking Freeze" and supporting documentation, for which a public hearing will be held on April 25, 2017. The proposed regulatory amendments are accompanied by a background document and a formal request from the Massachusetts Port Authority (MassPort) to allow an additional 5,000 commercial parking spaces at Boston Logan International Airport. The formal request made by MassPort includes technical documentation of the estimated emission benefits resulting from the requested regulatory amendments.

EPA Region 1 has reviewed MassDEP's proposed regulatory amendments and supporting documentation. You will find the Agency's comments in the Enclosure.

As you know, 310 CMR 7.30 was previously approved into the Massachusetts State Implementation Plan (SIP). (66 FR 14318; March 12, 2001.) Therefore, once adopted, the revised version of the rule should also be submitted to EPA as a SIP revision.

We thank you for the opportunity to provide feedback on the proposed regulatory amendments. If you have any questions regarding this matter, please contact Ariel Garcia of my staff at 617-918-1660.

Sincerely,

A handwritten signature in blue ink that reads "Anne E. McDonald".

Anne Arnold, Manager  
Air Quality Planning Unit

Enclosure

cc: Bethany Card, MassDEP

Enclosure

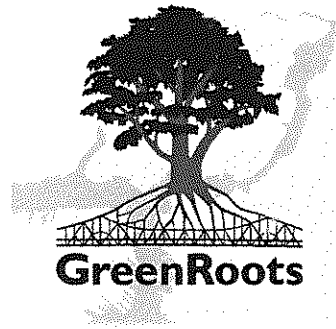
**EPA Comments on the Massachusetts Department of Environmental  
Protection's Proposed Amendments to  
310 CMR 7.30  
"Massport/Logan Airport Parking Freeze"**

As noted on page 7 of the "Background Document on Proposed Amendments to 310 CMR 7.30," dated March 24, 2017, (Background Document) 310 CMR 7.30(5) allows MassPort to increase the parking spaces within the Logan Airport Parking Freeze by acquiring Park-and-Fly spaces that were contained in the East Boston Parking Freeze Area inventory. We also note that the SIP-approved version of 310 CMR 7.30(2)(a)3. sets a cap on the number of total parking spaces subject to the Logan Airport Parking Freeze even after any Park-and-Fly spaces are acquired.

Therefore, EPA recommends that 310 CMR 7.30(2)(a)3. not be deleted as depicted in the proposed amendments, and instead be amended to read as follows:

"The parking spaces within the Logan Airport Parking Freeze area may increase above ~~19,315~~ **26,088** spaces in accordance with 310 CMR 7.30(5), providing that the inventory of commercial and employee parking spaces subject to the Logan Airport Parking Freeze does not exceed ~~21,790~~ **26,790** parking spaces."

This will appropriately reflect the 702 Park-and-Fly spaces remaining in the East Boston Parking Freeze area inventory, as referenced on page 7 of the Background Document.



## **GreenRoots**

227 Marginal Street,

Suite 1

Chelsea, MA 02150

617.466.3076

[www.GreenRootsChelsea.org](http://www.GreenRootsChelsea.org)

May 8, 2017

Mr. Glenn Keith  
MassDEP  
Bureau of Air and Waste  
One Winter Street  
Boston, MA 02108  
Re: 310 CMR 7.30 Massport/Logan Airport Parking Freeze

Dear Mr. Keith:

On behalf of GreenRoots, a community based organization dedicated to environmental justice in Chelsea and neighboring communities, we offer the following comments on the Environmental Notification Form for Massport's proposal to add 5000 parking spaces to Logan International Airport.

As an organization with members in Chelsea and East Boston, we are deeply concerned about additional impacts caused by the 5000 new parking spaces in our already overburdened communities.

- We do not see proof that alternative measures have been considered and introduced, such as increasing parking capacity and efficiency at parking facilities along I-495, Rt 1 and elsewhere.
- There have been no public meetings in Chelsea to gain resident input and/or to inform the public of this proposal. As an environmental justice community, expanded efforts including public meetings held in the evening with interpretation, should've been the baseline for public outreach. Yet not one meeting was held in Chelsea and many residents are unaware of this proposal to change Massachusetts law.
- Every day, Chelsea and East Boston residents find their roads congested with traffic going to and from the airport. To avoid tolls, commuters cut through back roads en route to the airport. The Tobin Bridge and East Boston tunnels are significantly congested. This traffic makes it more difficult for residents to get into and out of their own neighborhoods. Moreover, the air emissions exacerbate Chelsea's and East Boston's poor air quality.

Chelsea and East Boston are severely impacted by environmental injustice. According to Dr. Daniel R. Faber and Dr. Eric Krieg, Chelsea is the 3<sup>rd</sup> and East Boston is the 5<sup>th</sup> most intensively overburdened communities in Massachusetts.<sup>1</sup> The Massachusetts Executive Office of Environmental Affairs Environmental Justice Policy classifies Chelsea and East Boston as environmental justice populations.<sup>2</sup> Both are considered minority majority communities that host vital industrial benefits for New England, at the cost of residents' public health and environmental rights. Chelsea's rate of hospitalizations for all respiratory illnesses for children ages 0 -14 is 54% higher than the state of Massachusetts; and likewise is 53% higher for seniors ages 65 and older.<sup>3</sup>

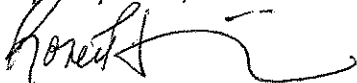
Low-income communities like Chelsea and East Boston are often transit-dependent. If residents of these communities are to rely on public transportation to travel to and from the airport and Boston proper, why is public transportation for travelers to Logan Airport not encouraged? We should be investing in clean transportation rather than encouraging an additional 5,000 vehicles, many of which will be single passenger trips. Water transportation from the Boston Harbor, South Shore and North Shore should also be considered.

Furthermore, the state should consider creating better connections between the Red Line and the Blue Line to encourage greater use of public transportation. Improvements can be made to the Silver Line to increase efficiency of that service; and Logan employees should be incentivized with MBTA passes, similar to the recent initiative at MIT, to encourage Massport and airport employees to use public transit which would free up employee parking spaces for general air passenger use.

Residents of Chelsea are deeply concerned that Massport's impacts continue to increase. Overnight flights, regular air traffic noise, vehicular trips and air emissions, impacts from the port serving Logan's needs, car rental facilities and parking lots worsen public health outcomes and environmental impacts which are going unmitigated day after day.

In short, we are deeply concerned by the continued expansion and encroachment of Logan International Airport.

Very Truly Yours,



Roseann Bongiovanni, MPH  
Executive Director  
Chelsea Resident - 7 Bell Street



Maria Belen Power  
Associate Executive Director

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<sup>1</sup> Faber, Dr. Daniel R., and Dr. Eric J. Krieg, Unequal Exposure to Ecological Hazards 2005: Environmental Injustices in the Commonwealth of Massachusetts, page 48, October 12, 2005.

<sup>2</sup> [www.mass.gov/envir/ej](http://www.mass.gov/envir/ej)

<sup>3</sup> MassCHIP, Massachusetts Department of Public Health, *Rate of Hospitalizations for Respiratory Illnesses, 1990 – 2003* prepared by Professor Neenah Estrella-Luna, PhD



Marcos Luna / Dr. Neenah Estrella-Luna (MBP)

Dr. Marcos Luna & Dr. Neenah Estrella-Luna  
143 Saratoga Street  
Boston, MA 02128

Devra Sari Zabot (MBP)

Devra Sari Zabot  
1016 Revere Beach Parkway, #402  
Chelsea, MA 02150

Catherine Maas (MBP)

Catherine Maas  
38 Beacon Street  
Chelsea, Ma 02150

Susana Carella (MBP)

Susana Carella  
27 Admirals Way  
Chelsea, MA 02150

Jack Bell (MBP)

Lad Dell  
14 Breakwater Drive  
Chelsea, MA 02150

Nanda Rust (MBP)

Nanda Rust  
20 Medford St.  
Chelsea, MA 02150

Maureen Cawley (MBP)

Maureen Cawley  
150 Captains Row Apt 504  
Chelsea 02150

John Valinch (MBP)

John Valinch  
13 Cheever Street #1  
Chelsea, MA 02150

Paula Garrity (MBP)

Paula Garrity  
12 Admirals Way  
Chelsea, MA 02150

Marisol Santiago (MBP)

Marisol Santiago  
25 Hooper St.  
Chelsea, MA 02150

Casey Pierce (MBP)

Casey Pierce  
405 Washington Ave.  
Chelsea, ma 02150

Yahya Noor (MBP)

Yahya Noor  
60 Prescott Ave  
Chelsea, MA 02150

Henry Wilson (MBP)

Henry Wilson  
105 Beacon St.  
Chelsea MA 02150

Carolyn P. Boumilar-Vega (MBP)

Carolyn P. Boumilar-Vega  
85 Blossom St.  
Chelsea, Ma 02150

Charles Klauder (MBP)

Charles Klauder  
11 Orange St  
Chelsea MA 02150

Silvia Chavez (MBP)

Silvia Chavez  
60 Dudley St.  
Chelsea, MA 02150

Sylvia Ramirez (MBP)

Sylvia Ramirez  
63 Reynolds Ave.  
Chelsea, MA 02150

Roberto Rodriguez Lugo (MBP)

Roberto Rodriguez Lugo  
855 Broadway Apt 102  
Chelsea MA 02150

**From:** Stephanie Best [<mailto:stephaniegbest@gmail.com>]  
**Sent:** Monday, May 08, 2017 4:49 PM  
**To:** Talks, DEP (DEP)  
**Subject:** Logan parking

Glenn Keith, MassDEP  
One Winter Street,  
Boston, MA 02108  
[DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us)

Dear Mr. Keith;

I am writing to support the amendment to the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. It is my understanding that Logan Airport is the only airport in the country to operate under a Parking Freeze, which limits commercial parking regardless of demand. Despite the increased number of passengers using of the airport, no parking has been added. This results in many passengers spending an inordinate amount of time and effort to have their car valet, moved, or circulated looking for parking. Parking capacity at Logan Airport has not come close to keeping pace with passenger growth. As a result, demand for parking exceeds supply on a regular basis. On-Airport parking is a necessity.

I support the amendment of the Logan Airport Parking Freeze to build 5,000 additional parking spaces at Logan Airport. I encourage you to do the same.

Sincerely,

Stephanie Best

**From:** Jason Burrell [<mailto:r.jason.burrell@gmail.com>]

**Sent:** Sunday, May 07, 2017 9:46 PM

**To:** Talks, DEP (DEP)

**Cc:** [adrian.madaro@mahouse.gov](mailto:adrian.madaro@mahouse.gov); Salvatore LaMattina; Michael Sinatra

**Subject:** Public Comment on Logan Parking Freeze and the Addition of 5,000 New Spaces

Dear Mr. Keith,

Thank you for the opportunity to submit comments regarding MassPort's request to construct 5,000 more parking spaces at Logan Airport. It is unfathomable to me that in the era of 1) the Commonwealth being legally bound to reduce its greenhouse gas emissions, 2) growing demand and market share of ride hailing services/transportation network companies, and 3) heavy and growing traffic congestion in a geographically restricted area that state agencies are even considering permitting more parking spaces, which fundamentally lead to more greenhouse gas emissions and more traffic.

We are completely opposed to Logan Airport building more parking spaces. Many large institutions, cities, and employment centers around the world have grown in square footage and activity substantially without adding parking. One of the best example locally of this is Kendall Square, which [added four million sq ft of development with no net new car trips](#). MassPort can and should plan for the future, but truly forward-thinking entities understand that they do not need to build expensive and wasteful parking garages.

MassPort itself has been a best practice in investing in modes of transportation that does not include parking. Its own data shows that investments in Logan Express and the MBTA's Silver Line have substantially increased the use of these services. Instead of presenting a proposal to spend \$250 million on parking spaces, MassPort should be required to document - now - what the impact would be on traffic and the environment if the agency invested \$250 million in transit and high-occupancy modes instead.

MassPort should survey its passengers to understand what ground transportation services they'd like to see in the future, instead of making the decision for them.

MassPort should also be required to use current data in its analysis. The information presented uses data from 2014. This is before Uber/Lyft/Transportation Network Companies (TNCs) were legally allowed to pickup/dropoff from Logan. Since TNCs are a new service at Logan, MassPort should be presenting data about their use and impact, and making decisions based on projections about their growth.

There are many opportunities to get passengers to Logan that do not include building parking - increasing Logan Express service, changing the trip and parking rate structures on Logan Express, invest in more frequent and direct Silver Line service, being more transparent to passengers and airlines about allowing TNCs, allowing taxis from municipalities outside of Boston, incentivizing TNCs and taxis to not travel to and from Logan with an empty backseat, working with municipalities to get priority bus lanes, etc. Many of these opportunities are a lot cheaper than building parking.

More parking means more traffic. With congested tunnels and roadways, passengers do not want to sit in (more) traffic to get to Logan. If MassPort provides ground travel options that were as attractive and convenient as parking, people will use them.

Thank you for your consideration and for the opportunity to comment.

Regards,

Jason Burrell  
187 Everett Street

**From:** Matthew Connolly [<mailto:matthewconnolly1@gmail.com>]

**Sent:** Sunday, May 07, 2017 8:58 PM

**To:** Talks, DEP (DEP)

**Subject:** Logan Parking Freeze

To Whom It May Concern:

I am writing to support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. Despite the increased number of passengers using of the airport, no parking has been added to accommodate traveling passengers like myself. This results in many passengers ultimately having their car valeted at Logan, or having to park off of the Logan campus, using local roads.

Living almost an hour south of the city, with two small children, driving to, and parking at Logan is crucial for our travel.

I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces at Logan Airport.

Sincerely,

Matt Connolly

(Bridgewater, MA)

**From:** Genevieve Cremaldi [<mailto:genevieve@cremaldis.com>]  
**Sent:** Saturday, May 06, 2017 2:17 PM  
**To:** Talks, DEP (DEP)  
**Subject:** Parking at Logan

Glenn Keith, MassDEP

One Winter Street,

Boston, MA 02108

[DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us)

Dear Mr. Keith;

I am writing to support the amendment to the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. It is my understanding that Logan Airport is the only airport in the country to operate under a Parking Freeze, which limits commercial parking regardless of demand. Despite the increased number of passengers using of the airport, no parking has been added. This results in many passengers spending an inordinate amount of time and effort to have their car valet, moved, or circulated looking for parking. Parking capacity at Logan Airport has not come close to keeping pace with passenger growth. As a result, demand for parking exceeds supply on a regular basis. On-Airport parking is a necessity.

-

I support the amendment of the Logan Airport Parking Freeze to build 5,000 additional parking spaces at Logan Airport. I encourage you to do the same.

Sincerely,  
Genevieve Cremaldi

May 8, 2017

Mr. Glenn Keith  
MassDEP  
Bureau of Air and Waste  
One Winter Street  
Boston, MA 02128

Re: 310 CMR 7.30 Massport/Logan Airport Parking Freeze

Via E-mail

Dear Mr. Keith,

I am writing to express my deep concern over the proposed lifting of the parking freeze at Logan International Airport in order to increase parking by 5,000 spaces. Massport has already successfully broken the freeze and is again attempting this maneuver. The freeze was originally instituted to protect the health and well-being of the impacted communities. This has not changed and Massport should not be allowed to change the definition of "freeze" to suit their purposes.

Massport has stated that one of their reasons for wanting more parking is to reduce the number of drop-off and pick-up trips (kiss and drop) by friends and relatives. If this is true, why has Massport recently allowed Uber and Lyft access to the airport AND given them their own parking lot! Since these are paid parking lots, is this an attempt by Massport to back-door their way around the freeze?

As a resident of an Environmental Justice Community, I feel that we are again being short-changed by Massport's lack of producing a comprehensive plan of future expansion so that the entire gamut of health and environmental impacts to our communities may be fully assessed.

For many years members of our community have urged Massport to regionalize flights. At the recent meeting in East Boston one of the union representatives that packed the meeting stated that residents needed to stop being roadblocks to expansion at Logan Airport and allow Boston to become a "world class city." In my opinion, Boston is, and always has been, a "world class city." Tourists and conventioners come to Boston to visit the city, not the airport. He also listed a number of cities that he considered to be world class. The fact he omitted is that many of those cities have more than one airport. Again, regionalize!

To summarize my points:

- The increased air pollution and noise pollution in our neighborhoods due to increased airplane and vehicular traffic is unacceptable.
- The lack of a comprehensive plan for all future expansion planned by Massport needs to be addressed. Cumulative effects cannot be measured adequately when all the projects are presented piecemeal.
- A plan to regionalize domestic flights to lessen the impact of increased international flights should be implemented.

It is my sincere hope that you will carefully consider these concerns and act in the interests of the people and neighborhoods adversely impacted by airport operations and not allow Massport to feel that any and all projects that they propose will automatically be approved.

Sincerely,

Patricia J. D'Amore  
95 Webster Street  
East Boston, MA 02128

617-561-4808

[pjeandamore@gmail.com](mailto:pjeandamore@gmail.com)

cc: Stewart Dalzell, Deputy Director, Environmental Planning and Permitting, Massport  
Sen. Joseph Boncore  
Rep. Adrian Madaro  
Mayor Martin Walsh via Claudia Correa  
Councilor Salvatore LaMattina



**From:** Craig Dandrow [<mailto:cdandrow@gmail.com>]  
**Sent:** Monday, May 08, 2017 11:26 AM  
**To:** Talks, DEP (DEP)  
**Subject:** Logan Airport Parking Freeze

To Whom It May Concern:

I am writing to support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. Despite the increased number of passengers using of the airport, no parking has been added to accommodate traveling passengers like myself. This results in many passengers ultimately having their car valeted at Logan, or having to park off of the Logan campus, using local roads.

Parking capacity has not come close to keeping pace with passenger growth. As a result, demand for parking exceeds supply on a regular basis. Without adequate parking, we will see more travelers driving around looking for parking or being diverted to overflow parking areas, which subjects the surrounding communities to increased vehicle idling, rerouting cars, and higher emissions.

I understand that more people use HOV options to get to Logan than to any other airport in the country thanks to the fact that there is much more availability of HOV seats and options.

However, for those who are not traveling from a location proximate to the city and public transportation or an alternative mode, parking at Logan is a necessity.

I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces at Logan Airport. I encourage you to do the same.

Sincerely,

Craig Dandrow  
Lynnfield, MA



Association of Independent  
Colleges and Universities  
in Massachusetts

11 Beacon Street, Suite 1224 | Boston, Massachusetts 02108-3093  
617.742.5147 | FAX 617.742.3089 | [www.masscolleges.org](http://www.masscolleges.org)

May 4, 2017

Massachusetts Department of Environmental Protection  
c/o Glenn Keith, Deputy Director  
Division of Clean Air & Climate Programs  
1 Winter Street, 7<sup>th</sup> Floor  
Boston, MA 02108

Dear Deputy Director Keith:

On behalf of the Association of Independent Colleges and Universities in Massachusetts, I am writing to express support for Massport's request to amend the Logan Airport Parking Freeze to add up to 5,000 new parking spaces at the airport. The current situation – where the ability to park at the airport is so uncertain – results in poor customer experience, lost time, potentially missed flights as well as a decrease in air quality. Logan Airport is an essential economic engine for the region, and it needs the capacity in its facilities to meet its customers' needs as efficiently as possible with minimal impact on the environment and the surrounding neighborhoods.

It is our understanding that Logan Airport is the only airport in the United States that operates under a parking freeze. The original goal of the freeze to reduce Carbon Monoxide (CO) emissions was an important one. After decades of technological improvement and changes in consumer behavior, emissions overall are down. It appears that raising the cap on the freeze at this time would *reduce* the number of vehicle trips and further reduce emissions, while providing a much needed solution to Logan's persistent parking challenge.

Our members, which include 58 colleges and universities with 284,000 students from across the country and around the world and nearly 100,000 faculty, staff and researchers, all rely on Logan for air service to attend education and research conferences, to visit with alumni/ae and to recruit prospective students to attend college here. All this helps to fuel, if not outright define, our globally recognized knowledge-based economy.

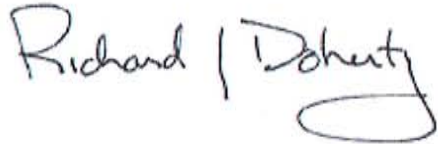
If a garage parking spot at Logan is not available, which happens frequently throughout the year, then one is forced to leave one's keys with an attendant, who then parks the car at a different location. Or, one must drive around trying to find parking somewhere else. This creates needless congestion which contributes to emissions and brings vehicles closer to residential neighborhoods. It also most certainly increases the likelihood of missing a flight.

Massport has done an exceptional job investing in alternative modes for accessing the airport, and many of our faculty, staff and students avail themselves of the subsidized services of the Silver Line and Logan

Express and other ride sharing options, resulting in a best-in-nation HOV mode share. However, there are still many circumstances where these services are not available or appropriate for our members. .

To address current constraints and accommodate future passenger growth, Massport is proposing a measured increase in its on-airport parking as a component of their broader goals of customer service and community and environmental stewardship. We fully support this effort and encourage you to do the same.

Sincerely,

A handwritten signature in black ink that reads "Richard Doherty". The signature is written in a cursive style with a large, prominent "D" and a long horizontal stroke at the end.

Richard Doherty, President



May 8, 2017

Glenn Keith  
Massachusetts Department of Environmental Protection  
One Winter Street  
Boston, MA 02108

RE: Massport/Logan Airport Parking Freeze

Dear Mr. Keith:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroFuture*, the regional land use plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, as well as impacts on the environment. MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the goals of *MetroFuture*.

The Commonwealth has a longstanding goal of shifting automobile trips to other modes, such as transit, bicycle, or pedestrian. Additionally, under the Global Warming Solutions Act (GWSA), the Commonwealth has a statutory obligation to reduce greenhouse gas emissions (GHG) by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050.

In May 2016, the Massachusetts Supreme Judicial Court released a unanimous decision in *Kain vs. Massachusetts Department of Environmental Protection* ordering MassDEP to take additional measures to implement the 2008 Global Warming Solutions Act. Specifically, the Court held that MassDEP must impose volumetric limits on the aggregate greenhouse gas emissions from certain types of sources and that these limits must decline on an annual basis. This recent ruling reasserts the state's obligation to meet the goals laid out in the GWSA.

The Massachusetts Department of Environmental Protection (MassDEP) proposes to amend 310 CMR 7.30 *Massport/Logan Airport Parking Freeze*, at the request of the Massachusetts Port Authority (Massport), to allow an additional 5,000 commercial parking spaces at Boston Logan International Airport, and to require evaluation of ways to reduce the number of vehicle trips to and from the airport. Logan Airport has been subject to the *Massport/Logan Airport Parking Freeze* on the number of commercial parking spaces there since 1975. In June 2016, Massport, the owner and operator of Logan Airport, submitted a proposal to MassDEP to amend the *Massport/Logan Airport Parking Freeze* by increasing the commercial parking freeze limit by 5,000 spaces, or 27 percent, from 18,640 to 23,640 spaces.

According to Massport's Environmental Notification Form (ENF)<sup>1</sup>, submitted for the Logan Airport Parking Project, Massport plans to construct additional parking by adding spaces atop the existing Economy Garage and above the existing Terminal E surface parking lot. Massport's goal is to have all 5,000 additional commercial parking spaces in service between 2022 and 2024. The ENF indicates the parking spaces are intended to accommodate existing and anticipated air passenger demand for parking.

Massport believes that the additional parking spaces will reduce trips to and from the airport. The agency contends that this will result mainly because people currently being dropped-off/picked-up at the airport by family members, friends, taxi, Uber, or Lyft will instead drive and park, therefore eliminating two "deadhead" trips that occur when the automobile is traveling to or from the airport without the air passenger.

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<sup>1</sup> Dated March 2017.

MAPC respectfully suggests that this assumption has several flaws, and particularly fails to take into account the rise of Transportation Network Companies (TNCs) and their impact on travel to and from Logan Airport. In fact, we believe that data already developed through the 2016 Air Passenger Survey begins to demonstrate the TNCs may be having a salutary effect on drop-off/pick-up travel at Logan Airport.

Additionally, MAPC is concerned that increasing commercial parking by 5,000 spaces may inadvertently increase, rather than reduce, the number of auto trips to/from the airport and therefore worsen air quality. We feel additional study is needed to determine if lifting the parking freeze is warranted. Finally, MAPC believes there are more effective strategies that Massport should pursue to reduce the number of drop-off/pick-up trips to and from Logan. Both the studies and the implementation of alternative strategies should be undertaken before MassDEP approves an increase to the parking freeze.

MAPC commends Massport for their past and ongoing work to advance transit access and high occupant vehicle (HOV) modes, as well as their continuing efforts to implement a comprehensive strategy to enhance ground transportation options for air passengers and employees to and from Logan Airport. Nevertheless, MAPC has concerns that the proposed increase in commercial parking spaces may unintentionally cause people who customarily use transit, shared-rides, and other HOV modes to access Logan Airport may begin choosing to access the airport by single occupant vehicle (SOV) instead.

Following are MAPC's comments and concerns that address the proposed amendment to the *Massport/Logan Airport Parking Freeze*, along with recommendations that we believe would enhance transit, shared-ride, and HOV access to and from Logan Airport. We respectfully request that MassDEP delay the adoption of the amendment until the 2016 Air Passenger Survey data can be taken into account, and additional studies can be conducted and evaluated. As presented, the analysis does not warrant increasing the parking freeze.

#### Questions Regarding Massport's Analysis

MAPC has reviewed both the technical analysis presented in the Background Document on Proposed Amendments to the *Massport/Logan Airport Parking Freeze* and in the ENF, and we have concluded that central components of the analysis are based on questionable assumptions, which may result in a flawed analysis.

#### *Transportation Network Company (TNC) Trips*

Given Massport's concern regarding drop-off and pick-up activity and the resulting air quality degradation, MAPC is surprised that neither the Background Document on Proposed Amendments to 310 CMR 7.30 *Massport/Logan Airport Parking Freeze*, nor the ENF, includes any discussion of TNC trips (e.g., Uber, Lyft, Fasten). The recent onset of TNCs is an unprecedented and rapidly growing transportation service likely to have significant impacts on airports. These services could potentially reduce the number of deadhead trips that are of most concern to Massport, especially now that TNC's are allowed to pick up at Logan Airport as of February 1, 2017. Furthermore, it is unlikely that air passengers choosing to use TNCs would switch to driving and parking a private vehicle at Logan, given the convenience and low costs associated with these services.

A recently released report, *Unsustainable? The Growth of App-Based Ride Services and Traffic, Travel and the Future of New York City*<sup>2</sup> concluded that TNCs "have become an important and fast-growing part of the city's transportation system. In each of the last two years, they have been the leading source of growth in non-auto (i.e., non-personal car) travel in the city." (p. 1) In particular, this study confirms that

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<sup>2</sup> Schaller Consulting, February 2017. (<http://www.schallerconsult.com/rideservices/unsustainable.pdf>)

the growth of TNCs is a significant component for travel to and from airports. According to the report, the amount of taxi and TNC trips accessing JFK and LaGuardia Airports has increased by 38% from 2013 to 2016<sup>3</sup>. This is higher than the overall 22% increase for the New York metropolitan area as a whole.

Massport's analysis centers upon information from the 2013 Air Passenger Survey Data. MAPC is surprised Massport has elected not to include results from the 2016 Air Passenger Survey Data, but rather relies upon the older survey data. According to Massport's website, the 2016 Air Passenger Survey was conducted in the spring of 2016 and that the survey results should have been posted in the winter of 2016/2017.

Upon request, Massport provided concise summary slides based on information from the 2016 Air Passenger Survey<sup>4</sup>. This information indicates a significant change in how people are accessing Logan from 2013 to 2016, in which fewer people are taking taxi cabs (approximately a 47% reduction, from 18.6% to 9.8% of all trips) and fewer being dropped-off/picked-up (24% reduction, from 28.1% to 21.3% of all trips). The analysis shows that 14.3% of people traveling to Logan do so by TNCs, a strong indicator that this type of transportation service has an impactful presence at Logan Airport. Meanwhile, the number of private vehicles arriving at the airport declined by about 20% between 2013 and 2016<sup>5</sup>. Massport has indicated that these private vehicle trips are of the greatest concern given potential deadhead trips and increased vehicle emissions.

The 2016 survey results, indicating a sudden rise in TNC trips and the decline in overall private vehicle trips, casts doubt upon much of Massport's argument about inefficient drop-off and pick-up activity occurring at Logan Airport. The rise of TNC use, coupled with the recent revision of regulations that now allows Uber and Lyft to pick up passengers at the airport (when previously they were only allowed to drop-off passengers), warrants additional study before MassDEP makes a decision to increase the parking freeze.

It is important to note that the 2016 survey was conducted approximately a year ago. Change in the demand-based transportation sector has been fast since then, and Massport only recently implemented regulations allowing for TNC pick-ups at Logan Airport. The switch to TNCs as an alternative to drop-offs/pick-ups involving deadhead trips may only have increased since that time. In fact, increasing the amount of parking may be targeting a problem that is already well on its way to being solved through other means.

Given this new information, we feel it is imperative that Massport analyze the extent to which TNC trips may be replacing drop-off/pick-up trips to and from Logan Airport, and therefore reducing deadhead trips. This study should also explore implementing a policy that requires taxis and TNCs not to deadhead when either arriving at or departing from Logan Airport. Requiring taxis and TNCs to carry air passengers both when entering and exiting Logan Airport could increase the efficient management of these trips, and negate all or part of the need for additional on-site parking. MAPC feels strongly that this analysis of both data and policy options should *precede* any DEP decision to raise the parking freeze.

#### *Calculation Assumptions*

Due to incomplete or outdated data, a number of assumptions in Massport's calculations may overstate the issues currently occurring at Logan Airport.

Massport's analysis consistently references results from the 2013 Passenger Survey that appear to indicate that 75% of passengers would utilize drop-off/pick-up modes of travel if parking were not available. This

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<sup>3</sup> Table 2. Combined Taxi/TNC trips, 2013 to 2016.

<sup>4</sup> Information on 2016 Air Passenger Survey, February 16, 2017.

<sup>5</sup> 2016 Massport Survey Data. Includes Private Vehicles that Pick-Up/Drop-Off, Parked On-Airport, and Parked Off-Airport.

figure does not separate the many different kinds of drop-off and pick-up activities that currently occur, and includes high-efficiency taxi and TNC trips along with low-efficiency personal vehicle trips in this calculation, potentially misstating the overall impact of these trips.

Within Massport's calculations, a vehicle trip factor is applied. Massport's resource for this information is the July 1993 Logan Airport Generic Environmental Impact Report (GEIR). Given the substantial amount of data that Logan collects on a regular basis, MAPC requests that more recent data be utilized for this analysis. The 1993 data Massport utilizes proceeds under the assumption that drop-off/pick-up activities account for 4.00 trips. Again, there is no reference or vehicle trip factor identified for the TNC trips that have significantly increased in recent years, so it is unclear how Massport is defining those trips in their calculations. For example, Massport does not define a vehicle occupancy rate for TNC trips in their calculations.

#### *Impact of the 1989 Amendment to the Logan Airport Parking Freeze*

The 1989 Logan Airport Parking Freeze Amendment was developed to address evidence that constrained parking leads to increased drop-off/pick-up vehicle activities, resulting in an overall increase in ground transportation Vehicle Miles Travelled (VMT) and emissions. Although the ENF issued in March 2017 provides information about modeled emissions of carbon dioxide (CO), Oxides of Nitrogen (NOx), and Volatile Organic Compounds (VOCs), no information is provided whether drop-off/pick-up activity decreased as a result of the construction of more parking subsequent to the 1989 Logan Airport Parking Freeze Amendment.

DEP should not be making a decision to take the same action (increasing the parking freeze) based on the same goal (reducing drop-off/pick-up trips) without any evidence indicating that the past action, in 1989, actually had the predicted result.

#### *Air Passenger Survey Data Only Accounts for Arrival Data*

The Air Passenger Survey is an intercept survey of passengers arriving for flights. The survey focuses solely on what mode of transportation passengers use when arriving at the airport. Massport's analysis assumes passengers arrive and depart using the same mode. There is no recognition that a number of passengers are likely to use different modes when arriving at and departing from Logan Airport. This is precisely the kind of data problem that could be solved with a more detailed analysis.

#### Proposed Studies

Section 8, Transportation Management Studies and Programs, of 310 CMR 7.30<sup>6</sup> will require Massport to complete three studies to aid the authority's efforts to reduce the air quality impacts of different ground access modes for travel to and from Logan Airport. The studies would be completed within 24 months of the date of adoption of the regulatory amendment.

However, since we question many Massport's assumptions, we believe it is essential that Massport be required to conduct these studies *first* and *then* implement their recommendations, *before* increasing the number of commercial parking spaces. The Draft 310 CMR 7.30 Amendments describes the three studies as follows:

1. *A study of the costs, feasibility, and effectiveness of potential measures to improve high occupancy vehicle access to Logan Airport. The study shall consider, among other things, possible improvements to Logan Express bus service and the benefits of adding Silver Line buses with service to Logan Airport.(page 4)*
2. *A study of costs and pricing for different modes of transportation to and from Logan Airport to identify a pricing structure and the use of revenues so generated to promote the use of high*

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<sup>6</sup> Draft dated February 13, 2017.

*occupancy modes of transportation by Logan Airport air travelers and visitors. The study shall include evaluation of short-term and long-term parking rates and their influence on different modes of airport transportation. (page 5)*

- 3. A study of the feasibility and effectiveness of potential operational measures to reduce non-high occupancy vehicle drop-off/pick-up modes of transportation to Logan Airport, including an evaluation of emerging ride-sharing and transportation network company modes. (page 5)*

#### Drop-Off/Pick-Up Activity and Fee Structure

According to Massport, drop-off/pick-up vehicle activity is growing due to the constrained parking supply. The agency surmises that this has led to an increase in the total number of vehicle trips generated by Logan Airport air passengers. Massport is concerned that if the commercial parking supply at Logan Airport remains the same, this will continue to cause an increase in both vehicle trips and curbside congestion due to drop-off/pick-up activity by private vehicles.

Our perspective is that the link between the lack of parking and drop-off/pick-up activity, while plausible, is not proven, and providing that proof should have been a considerable objective of Massport's analysis. One option to discourage drop-off and pick-up of air passengers is to consider implementing a drop-off/pick-up fee. Such a fee could improve air quality by reducing idling as well as encouraging the use of other modes of travel, such as public transit.

For example, Dallas/Fort Worth International Airport charges a fee for both parking and pass-through activity. The airport's parking fee structure discourages air passenger drop-off/pick-up by charging \$4 for 0-8 minutes and then drops the fee to \$2 for 8-30 minutes<sup>7</sup>. At major airports in Great Britain, private vehicles must pay for the convenience of loading or unloading of passengers at airport entrances. Massport should evaluate the impact that fees for drop-off/pick-up activity would have on air quality before MassDEP increases the parking freeze. It is always more popular to add parking than to charge a fee, but the latter may be more effective at accomplishing both air quality and mode shift goals. Therefore, this policy idea (and others) should be assessed before the parking freeze is raised. This analysis could easily be incorporated into the three studies outlined above.

As previously mentioned, increasing the number of on-site commercial parking spaces by 27 percent could further degrade, not improve air quality, and may unintentionally shift transit trips to SOV trips. We therefore request that any modifications to the allocation of commercial parking spaces should not be permitted until all other options have been systematically and thoroughly evaluated and implemented. It is important to remember that there are numerous ways to address VMT and air quality impacts before jumping to the conclusion to construct revenue-generating on-site parking facilities.

MAPC looks forward to continuing to stay engaged as part of the review process. Thank you for the opportunity to comment.

Sincerely,



Marc D. Draisen  
Executive Director

cc: Thomas P. Glynn, CEO, Massport  
Martin Suuberg, Commissioner, MassDEP  
Secretary Stephanie Pollack, MassDOT  
Secretary Matthew A. Beaton, EOEEA

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<sup>7</sup> Parking fees at Logan Airport increase incrementally over time.





Concerned Citizens for East Boston

May 8, 2017

Massachusetts Department of Environmental Protection  
One Winter Street  
Boston, MA 02108

RE: Massport/Logan Airport Parking Freeze

To Whom It May Concern:

I write this letter to state our opposition to increase parking at Logan Airport by 5000 vehicles. As a civic organization formed for the betterment of East Boston, our group is vehemently opposed to anything that would detrimentally change the existing quality life of any East Boston resident. Adding an additional 5000 vehicles to the already congested streets of East Boston will only cause irreparable harm to the residents who constantly suffer from Logan Airport's operations. Instead of lifting the "freeze" which was put in place to prevent such as an event as Massport is requesting with Terminal E expansion, a study must be conducted on safer alternatives. For example, expansion of Park and Ride facilities in the Route 495 corridor would satisfy Massport's objective of increased commuters to Logan without the noise, traffic and pollution that 5000 vehicles would. Offering public transportation (i.e. connecting the blue line with the red line or other configurations) would also offer tremendous benefits without increasing the harmful dangers.

There are many alternatives that need to be studied. A solution to satisfy all does exist but to increase the parking by 5000 spaces is not it. Please be considerate of the people's wishes who live with the ever increasing burden of Logan Airport. Please do not lift the parking freeze.

Empower East Boston



## South Shore Chamber of Commerce

May 4, 2017

MassDEP

c/o Glenn Keith, Deputy Director – Division of Air and Climate Programs  
1 Winter Street, 7<sup>th</sup> Floor  
Boston MA 02108

Dear Mr. Keith:

On behalf of the 1300 members of the South Shore Chamber of Commerce I am writing to express support for Massport's request to amend the Logan Airport parking freeze and add 5,000 parking spaces at the airport. Logan Airport is an essential economic engine for the entire region and it needs the capacity in its facilities to meet its customers' needs as efficiently as possible with minimal impact on the environment and the surrounding neighborhoods.

The South Shore is in the middle of an economic opportunity of a lifetime with the revitalization of downtown Quincy, the build-out of the former Naval Air Station in Weymouth, and the development of Cordage Park in Plymouth to name only a few. In order to attract businesses and residents from outside the region to fuel this growth it is critical we have reliable parking and facilities at Logan.

Last year the Chamber adopted a regional development strategy which identified MassPort's services as vital to our regional economy. Our regional plan calls for assisting state and local officials in expanding that off-site parking which may include expanded water shuttle service from points on the South Shore to Logan. Massport has done an exceptional job investing in alternative modes for accessing the airport, and many of our members take advantage of services such as the Silver Line and Logan Express in Braintree. However, there are still many circumstances where these services are not available or accessible not to mention the loss of the Harbor Express ferry service from the Quincy Shipyard to Logan in 2013. Consequently, our members who cannot access alternative modes and who want to avoid being diverted to a secondary lot often ask a friend or relative to drop them off at the airport and pick them up when they return. That results in four vehicle trips to and from the airport whereas parking only results in two vehicle trips.

It is my understanding that Logan Airport is the only airport in the United States that operates under a parking freeze. The original goal of the freeze to reduce carbon monoxide (CO) emissions was a worthy one and after decades of technological improvement, emissions overall are down. It appears that raising the cap on the freeze at this time would reduce the number of vehicle trips and further reduce emissions, while providing a much needed solution to Logan's persistent parking challenges.

To address current constraints and accommodate future passenger growth, Massport is proposing a measured increase in its on-airport parking as a component of their broader goals of customer service and community and environmental stewardship. We fully support this effort and encourage you to do the same.

Sincerely,

A handwritten signature in black ink that reads "Peter Forman". The signature is written in a cursive, slightly slanted style.

Peter Forman  
President & CEO



Massachusetts Port Authority  
One Harborside Drive, Suite 200S  
East Boston, MA 02128-2909  
Telephone (617) 568-5000  
www.massport.com

May 8, 2017

Martin Suuberg, Commissioner  
Massachusetts Department of Environmental Protection  
One Winter Street, 2nd Floor  
Boston, MA 02108

Re: Proposed Amendment to Massport / Logan Airport Parking Freeze Regulation,  
310 CMR 7.30

Dear Commissioner Suuberg:

The Massachusetts Port Authority (“Massport”), owner and operator of Boston Logan International Airport (“Logan Airport” or “Airport”), respectfully submits these comments to the Massachusetts Department of Environmental Protection (“MassDEP”), with respect to the proposed amendment to MassDEP’s Massport/Logan Parking Freeze Regulations, 310 CMR 7.30 (the “Logan Parking Freeze”) currently being considered. This would be the first substantive amendment to the Logan Parking Freeze since it was revised and adopted in its current form by MassDEP in 1989 (the “1989 Amendment”).

The proposed amendment of the Logan Parking Freeze was issued for public comment by MassDEP on March 24. A public hearing was held on April 25 in the Noddle Island Community Room at the Logan Airport Rental Car Center. This letter summarizes the environmental policy goals that would be served by the proposed amendment, and it responds to issues raised in written comments received by MassDEP and oral comments made at the public hearing.

#### ***Environmental Goals and Benefits of the Proposed Amendment***

The Logan Parking Freeze was established in 1975 as a strategy to reduce air pollution caused by automobile emissions and to achieve the air quality standards established by the federal Clean Air Act. Today, Eastern Massachusetts has achieved compliance with the federal standards for carbon monoxide (CO) and ozone, the two criteria pollutants that were the focus of the original 1975 freeze.

The Logan Parking Freeze has been effective to a point, as Massport has achieved the broad goals of the original freeze and the 1989 Amendment. As a result of the Logan Parking Freeze and the constrained parking at Logan Airport, Massport has continued to prioritize transit and high occupancy vehicle (HOV) access to the airport through the significant expansion of its Logan Express sites and service and by its financial support of MBTA Silver Line access to Logan Airport. As part of its Trip Reduction Strategy Massport has purchased eight Silver Line buses that serve the Airport, funds operations and maintenance of those trips and has financially supported Silver Line bus trips since 2012 by offering free boardings from the Airport terminals. Massport has expanded from its two original Logan Express sites to include five locations, resulting in an increase of the total capacity of HOV/shared-ride mode service by 154% since

1989. As contemplated by the 1989 Amendment, Massport has acquired Park-and-Fly lots in East Boston, permanently removing these spaces from East Boston and transferring them to the Airport. Massport has also permanently shifted a large number of employee spaces to commercial use, in keeping with the goal of the 1989 Amendment.

Despite Massport's Trip Reduction Strategy to bolster transit and HOV travel to and from Logan Airport, limiting the commercial parking supply at Logan Airport to its currently constrained (capped) level under the Logan Parking Freeze is now having the unintended effect of negatively impacting air quality, for reasons related to the significant increase in air passengers using Logan Airport and the trend toward more longer-term parking at Logan. The same effects were being felt in 1989 when the Parking Freeze was last amended.<sup>1</sup> Recent analysis shows that the constrained parking supply at Logan Airport causes 75% of passengers who would otherwise choose to park to use a private pick up/drop off mode, thereby resulting in up to four trips to the Airport rather than two. As a result, the Logan Parking Freeze in its current form is having the unintended effect of causing an increase in overall airport-related ground access vehicle miles travelled (VMT) and associated vehicle emissions in the metropolitan Boston region. Increasing on-airport commercial parking spaces will cause a significant corresponding decrease in VMTs and associated emissions associated with those pick up/drop off mode trips, as compared with not amending the Logan Parking Freeze. Adding 5,000 spaces to the Logan Parking Freeze will allow for a substantial decrease in VMT at the Airport and will provide a significant air quality benefit. The March 2017 Background Document issued by MassDEP to accompany the proposed amendment, together with the materials in Attachment 1 to the Background Documents, which were prepared by Massport, provides the detailed technical data and analysis to support these conclusions.

As discussed in the MassDEP Background Document, the proposed amendment would maintain the current structure and format of the Massport / Logan Airport Parking Freeze Regulation, 310 CMR 7.30. The principal substantive change would be an increase in the commercial parking freeze limit by 5,000 spaces. The technical analysis contained in Attachment 1 to the Background Document shows that this increase in commercial parking spaces would yield a significant environmental benefit. Regional VMT would be reduced, leading to reductions in

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<sup>1</sup> When EPA approved the 1989 Logan Parking Freeze Amendment, in March 1993, its approval expressly noted this unintended effect:

“[T]he existing parking freeze has had the unanticipated effect of vastly increasing passenger drop-off and pick-up, resulting in twice as many vehicle trips as would occur if each passenger drove to the airport. The increase of 2000 commercial spaces at the airport, coupled with the program for exchanging employee spaces for commercial spaces and with continuing improvements in alternate means of access to the airport, should lessen the drop-off/pick-up phenomenon.”

58 Fed. Reg. 14153 (March 16, 1993).

emissions of CO<sub>2</sub>, VOCs, and NO<sub>x</sub> by at least 20%, compared with the base case of constrained parking supply under the current Logan Parking Freeze.

In keeping with the structure of the 1989 Logan Parking Freeze Amendment, the proposed amendment couples increasing the commercial parking freeze limit with requirements designed to support transit and HOV travel to and from Logan Airport. Under the proposed amendment, Massport would continue to maintain the substantial transit and HOV improvements described earlier in this letter and further described in Attachment 1 to the Background Document.

As with the 1989 Amendment, the proposed Logan Parking Freeze amendment would also require Massport to undertake studies aimed at furthering its long-range efforts to address VMT and air quality impacts of different ground access modes for travel to and from Logan Airport. Three long-term studies are included, by which Massport will consider: (1) ways to improve HOV access to Logan; (2) costs and pricing for different modes of transportation to and from Logan, including evaluation of parking rates; and (3) strategies for reducing pick-up / drop-off modes, including an evaluation of emerging ride-sharing and transportation network company modes. And, as with the 1989 Amendment, under the proposed amendment Massport will make all reasonable efforts to identify, analyze, and implement programs that maintain and improve the current Logan Express service.

### ***Responses to issues raised***

1. *Project-specific impacts of new commercial parking facilities at Logan will be addressed through the submission and public review of an EIR under the MEPA review process.*

Several commenters raised concerns about potential environmental impacts of new parking facilities at Logan. The amendment of the Logan Parking Freeze will not, in and of itself, permit the construction of new commercial parking at Logan. As noted in the MassDEP Background Document, any proposal by Massport to build 1,000 or more new parking spaces would require the submission and public review of a mandatory Environmental Impact Report (EIR) under the Massachusetts Environmental Policy Act (MEPA), M.G.L. c.30, ss. 61 – 62H.

Massport has prepared and submitted an Environmental Notification Form (ENF) to the MEPA Office, describing its proposal to build 5,000 new commercial parking spaces in two garage locations at Logan. As described in the ENF, the two proposed garage locations were determined through an extensive process of consultation with key East Boston community stakeholders. A scoping session on the ENF was held by the MEPA Office at East Boston High School on April 20, and public comments were received through April 25. On May 5 the Secretary of Energy and Environmental Affairs (EEA) issued an ENF Certificate, setting forth the scope for the required EIR. Among the issues that Massport is required to address are the following:

- Detailed description of existing conditions including on and off-Airport access, on-Airport circulation, and parking

- Methodology description and analysis of the potential shifts in travel mode to the Airport produced by the addition of proposed parking facilities as outlined in Massport's technical memorandum to MassDEP
- Updated air quality analysis of shift mode share from drop-off/pick-up modes and result in reductions in regional off-Airport VMT
- Construction phase impacts and mitigation,
- Summary of beneficial measures provided by the Parking Project and opportunities for mitigation of any unavoidable adverse impacts, including Draft Section 61 Findings.
- Detailed response to comments submitted on the ENF

Upon completing the review of the EIR, Massport will commit, in Section 61 Findings adopted under MEPA, to undertake specific measures that will avoid, minimize, or mitigate the environmental impacts of the parking facility.

2. *The studies required under the proposed amendment to the Logan Parking Freeze, together with the MEPA review process, will inform the future enhancement of HOV service to Logan.*

Several commenters suggested a range of projects and programs that could support and enhance HOV access to Logan. The purpose of the studies required under the proposed amendment to the Logan Parking Freeze is to provide data and detailed analyses on the relative value, efficiency, and feasibility of a range of potential actions to support HOV service and reduce regional VMT and air emissions. Those studies will, in turn, inform future actions by Massport. Additionally, the analysis in the EIR for the parking facility is expected to result in specific mitigation measures, to be documented by Massport in its Section 61 Findings for the project.

3. *Airport-wide environmental conditions will be addressed on a continuing basis through the annual submission and public review of EDR and ESPR documents under the MEPA review process.*

Several commenters raised concerns about broader airport-wide environmental impacts associated with Logan Airport, as opposed to the impacts of the specific garage facility that would proceed upon the amendment of the Logan Parking Freeze. It is important to note that Logan Airport is the only facility in Massachusetts that reports and analyzes the cumulative environmental impacts of its operations and activities on an annual basis. As described in the MassDEP Background Document, this reporting has taken place continuously since 1979; it occurs through the Environmental Data Reports (EDR), submitted annually, and the more detailed Environmental Status and Planning Report (ESPR), submitted on a five-year cycle. EEA and the MEPA Office have consistently acknowledged the importance of the EDR / ESPR process. It provides a unique and invaluable forum for the analysis of airport-wide operations and impacts, and it supplies the context for the more focused MEPA review of individual projects, such as the parking facility.<sup>2</sup>

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<sup>2</sup> See, e.g., ENF Certificate on Terminal E Modernization (EEA #15434), Dec. 16, 2015.

For this reason, the proposed amendment to the Logan Parking Freeze would allow Massport to incorporate its annual reporting under the Parking Freeze into its annual EDR and ESPR (every five years) submissions. In this way, public review of current trends and activities occurring under the Logan Parking Freeze will take place within the context of information on all activities airport-wide.

4. *Technical correction*

We note the comment letter received from U.S. EPA, dated April 11, 2017, and we do not object to the proposed technical correction to the regulatory amendment set forth in EPA's letter.

***Summary***

The proposed amendment to the Logan Parking Freeze would be environmentally beneficial, by leading to decreases in regional VMT and vehicle emissions. The modification would provide for a moderate increase in the number of commercial parking spaces at Logan Airport, while requiring Massport to continue and enhance its strong commitment to maintaining, developing and supporting alternative transit and HOV modes to Logan Airport.

Please let us know if you require any further information. We appreciate the opportunity to comment on the proposed amendment, and look forward to working together with MassDEP on this important initiative.

Sincerely,



Thomas P. Glynn, Chief Executive Officer  
Massachusetts Port Authority





27-01 Queens Plaza North  
Long Island City, NY 11101  
jetblue.com

May 8, 2017

MassDEP  
c/o Glenn Keith, Deputy Director – Division of Air & Climate Programs  
1 Winter St, 7<sup>th</sup> Floor  
Boston, MA 02108

**RE: Proposed Amendment to Massport / Logan Airport Parking Freeze Regulation Under Massachusetts Statute 310 CMR 7.30**

Dear Mr. Keith:

As Boston's largest airline, JetBlue Airways Corporation ("JetBlue") supports the Massachusetts Port Authority ("Massport") request that the Massachusetts Department of Environmental Protection ("MassDEP") amend MassDEP's Massport/Logan Parking Freeze Regulations, 310 CMR 7.30 (the "Logan Parking Freeze") by increasing the commercial parking freeze limit by 5,000 spaces at Logan Airport.

JetBlue is deeply invested in the Commonwealth and has driven significant growth at Logan Airport over the past thirteen years that JetBlue has served Boston. JetBlue's business model is premised on bringing high-quality service and low fares to markets that are either underserved, overpriced, or both. It is this recipe that has helped JetBlue become Boston's largest airline, currently with 150 daily departures and with plans to increase service to 200 peak day departures in the coming years, and the only airline with commercial service at Worcester Regional Airport (ORH). In addition, JetBlue offers seasonal service to Nantucket (ACK), Hyannis (HYA) and Martha's Vineyard (MVY). With the recent introduction of nonstop service between Boston Logan International Airport (BOS) and Atlanta, GA, JetBlue serves 63 destinations from BOS on a nonstop basis, more nonstop destinations than any other airline has ever served from BOS. With the depth and breadth of connectivity options that JetBlue provides in BOS, JetBlue has partnered with Massport to bring more international service to Boston than ever before by partnering with carriers including Emirates, Turkish Airlines, El Al, Aer Lingus and over 40 other airline partners.

With public plans to grow to 200 peak daily departures, JetBlue will continue its commitment to Boston as key focus city for our airline. To accommodate this increase in activity, JetBlue is of the opinion that the Parking Freeze at Logan Airport should be amended. No other large hub airport in the United States has such a freeze. The original goal of the freeze to reduce Carbon Monoxide (CO) emissions was a worthy one. Indeed, after decades of technological improvement, emissions overall are down. In furtherance of the Logan Parking Freeze's objective, an amendment to increase the number of spaces at Logan Airport would reduce the number of vehicle trips and reduce emissions while providing a much-needed solution to Logan's persistent parking shortage.

Relief for airport customers, JetBlue crewmembers and airport employees is urgently needed and the Parking Freeze increase of 5,000 spaces is a good step. JetBlue applauds Massport for investing in

alternative modes of transit – including frequent bus service from multiple locations across the Boston Metropolitan Area – enabling convenient access to the airport. Many of our crewmembers and customers take advantage of these services. However, there are still many circumstances where these services are not available or accessible. Without this Parking Freeze increase, future growth at BOS, and the economic and employment benefits that come with that growth, is uncertain.

Thank you for your attention to JetBlue's views in this matter. We look forward to working together with Massport and Mass DEP on this important measure.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Goodell', with a long horizontal flourish extending to the right.

Jeffrey Goodell  
Vice President Government and Airport Affairs

**From:** Emily Horwitz [<mailto:dellohorwitz@gmail.com>]  
**Sent:** Monday, May 08, 2017 12:28 PM  
**To:** Talks, DEP (DEP)  
**Subject:** Logan parking

Glenn Keith, MassDEP  
One Winter Street,  
Boston, MA 02108  
[DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us)

Dear Mr. Keith;

I am writing to support the amendment to the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. It is my understanding that Logan Airport is the only airport in the country to operate under a Parking Freeze, which limits commercial parking regardless of demand. Despite the increased number of passengers using of the airport, no parking has been added. This results in many passengers spending an inordinate amount of time and effort to have their car valet, moved, or circulated looking for parking. Parking capacity at Logan Airport has not come close to keeping pace with passenger growth. As a result, demand for parking exceeds supply on a regular basis. On-Airport parking is a necessity.

I support the amendment of the Logan Airport Parking Freeze to build 5,000 additional parking spaces at Logan Airport. I encourage you to do the same.

Sincerely,  
Emily Horwitz

**From:** Emily Horwitz [<mailto:dellohorwitz@gmail.com>]  
**Sent:** Monday, May 08, 2017 12:30 PM  
**To:** Talks, DEP (DEP)  
**Subject:** Logan airport parking

Glenn Keith, MassDEP  
One Winter Street,  
Boston, MA 02108  
[DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us)

To Whom It May Concern:

I am writing to encourage the approval of the amendment to the Logan Airport Parking Freeze and build more commercial parking at Logan Airport. While when I am able to I opt to take public transportation, there are times when driving to the airport is necessary. However, it is often difficult to find adequate parking, which causes me to drive around looking for a spot.

Logan Airport served a record 36 million passengers in 2016. Without adequate parking, there will be an increase in emissions due to what many passengers have experienced: driving around looking for parking or being diverted to overflow parking areas. Furthermore, a shortage of parking leads to an increased number of people driving friends and family to the airport, which results in four vehicle trips instead of two associated with parking. What seems to be a very common occurrence is that people drive to and from the airport to drop their family or friends off and then return home, and then again drive to and from the airport when they return—also idling while waiting to pick them up.

Although I have heard that Logan has one of the highest rates of passengers using public transit and other HOV options, there are instances where travelers need to park instead, and they should be able to do that. Massport has made various investments to reduce emissions, from creation, support and promotion of HOV modes to a consolidated Rental Car Center bus fleet with new, fuel-efficient buses.

Those efforts, coupled with the fact that additional parking will decrease the amount of emissions and circulation at the airport and on local roads, is why I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces.

Sincerely,

Emily Horwitz  
37 Clark Road  
Newton, MA 02465

**From:** Lisa Jacobson [<mailto:lisajacobson@gmail.com>]  
**Sent:** Sunday, May 07, 2017 9:10 PM  
**To:** Talks, DEP (DEP)  
**Subject:** public comment on Logan Airport Parking Freeze

Dear Mr. Keith,

Thank you for the opportunity to submit comments regarding MassPort's request to construct 5,000 more parking spaces at Logan Airport. It is unfathomable to me that in the era of 1) the Commonwealth being legally bound to reduce its greenhouse gas emissions, 2) growing demand and market share of ride hailing services/transportation network companies, and 3) heavy and growing traffic congestion in a geographically restricted area that state agencies are even considering permitting more parking spaces, which fundamentally lead to more greenhouse gas emissions and more traffic.

We are completely opposed to Logan Airport building more parking spaces. We do support Logan's growth in its number of flights and passengers, and fully believe that Logan can continue to grow without building more parking spaces. Many large institutions, cities, and employment centers around the world have grown in square footage and activity substantially without adding parking. One of the best example locally of this is Kendall Square, which [added four million sq ft of development with no net new car trips](#). MassPort can and should plan for the future, but truly forward-thinking entities understand that they do not need to build expensive and wasteful parking garages.

MassPort itself has been a best practice in investing in modes of transportation that does not include parking. Its own data shows that investments in Logan Express and the MBTA's Silver Line have substantially increased the use of these services. Instead of presenting a proposal to spend \$250 million on parking spaces, MassPort should be required to document - now - what the impact would be on traffic and the environment if the agency invested \$250 million in transit and high-occupancy modes instead.

MassPort should survey its passengers to understand what ground transportation services they'd like to see in the future, instead of making the decision for them.

MassPort should also be required to use current data in its analysis. The information presented uses data from 2014. This is before Uber/Lyft/Transportation Network Companies (TNCs) were legally allowed to pickup/dropoff from Logan. Since TNCs are a new service at Logan, MassPort should be presenting data about their use and impact, and making decisions based on projections about their growth.

MassPort should not be allowed to build 5,000 parking spaces without also investing in high-occupancy travel modes. The proposal just obligates MassPort to evaluate/study alternative transportation proposals, but not necessarily to do anything with these studies. If MassPort wants to build parking, the agency should be required to invest the same amount in transit and other high-occupancy travel modes at the same time.

There are many opportunities to get passengers to Logan that do not include building parking - increasing Logan Express service, changing the trip and parking rate structures on Logan Express, invest in more frequent and direct Silver Line service, being more transparent to passengers and airlines about allowing TNCs, allowing taxis from municipalities outside of Boston, incentivizing TNCs and taxis to not travel to and from Logan with an empty backseat, working with municipalities to get priority bus lanes, etc. Many of these opportunities are a lot cheaper than building parking.

At minimum, MassPort should not be permitted to build 5,000 spaces at once - if parking is built, the spaces should be phased in at the same time that the agency invests in non-parking infrastructure and services.

More parking means more traffic. With congested tunnels and roadways, passengers do not want to sit in (more) traffic to get to Logan. If MassPort provides ground travel options that were as attractive and convenient as parking, people will use them.

Thank you for your consideration and for the opportunity to comment.

Lisa Jacobson  
David Aiken  
Boston, MA

**From:** Jim Linthwaite [<mailto:jlinthwaite@gmail.com>]  
**Sent:** Sunday, May 07, 2017 12:47 PM  
**To:** Talks, DEP (DEP)  
**Subject:** 310 CMR 7.30 Massport/Logan Airport Parking Freeze

To Whom It May Concern:

As a concerned resident of East Boston it is imperative that the Logan Airport Parking Freeze not be lifted. East Boston is already overburdened with traffic as well as noise and emission pollution from jets and cars using the airport.

By Massport's own admission in their Report To The Community "Thousands of travelers driving around looking for parking and being diverted to overflow parking areas significantly increases carbon monoxide and other vehicle emissions." Lifting the parking ban wouldn't remove these cars, it would increase them.

What is needed is a regional transportation plan or network that takes advantage of the extremely underutilized airports in the region such as Worcester and Hanscom Field. In addition a garage outside of 495, where Massport states their projected travelers are coming from, should be part of the network and use the Logan Express Shuttles for travelers as they currently do in Framingham and Peabody.

Lifting the current parking freeze and inviting 5000 more cars into East Boston is not the answer and will not cure the problem because with the expansion of Terminal E there will be many more thousands of cars still coming to Logan.

Lifting the parking freeze is not good for East Boston and providing a garage for those able to pay does not help a community already besieged by airport noise and pollution.

Please remember that Logan airport is in East Boston, not vice versa.

Respectfully,  
James Linthwaite  
Concerned East Boston Resident.



1 Beacon Street, 16th Floor  
Boston, MA 02108

www.aimnet.org | 617.262.1180 | fax 617.536.6785

April 21, 2017

**BY HAND**

Glenn Keith  
Deputy Director  
Massachusetts Department of Environmental Protection  
One Winter Street  
Boston MA 02108

Dear Deputy Director Keith:

On behalf of Associated Industries of Massachusetts (AIM), I am writing to express support for Massport's request to amend the Logan Airport Parking Freeze to add 5,000 parking spaces at the airport. The current situation – where the ability to park at the airport is so uncertain – results in poor customer experience, lost time, potentially missed flights as well as a decrease in air quality.

Founded in 1915, AIM has grown to become the largest employer association in the Commonwealth with more than 4,000 member companies and institutions located throughout the state. Our members represent all industries – manufacturing, financial services, retail, health care, high technology, biotech, education, hospitality, and social services. While we are sometimes perceived as representing large businesses, our average member employs under fifty employees.

Logan Airport is an economic engine for New England, generating more than \$13 billion in economic activities annually, and serving 53 international and 75 domestic destinations. In 2016, Logan served a record 36 million passengers, the seventh straight year of passenger growth. Logan's location and the number of direct international flights have been credited in helping Massachusetts secure additional direct foreign investments in our economy, especially in the life sciences, advanced manufacturing and data security sectors.

Our members rely on Logan for both international and domestic business travel, and the advent of additional direct flights have provided our members with additional opportunities to gain access to the global marketplace.

Regarding the need to add an additional 5,000 parking spaces at Logan, if a garage parking spot at Logan is not available, which happens frequently throughout the year, then one is forced to leave one's keys with an attendant, who then parks the car at a different location. Alternatively, one must drive around trying to find parking somewhere else. This creates needless circulation, which contributes to emissions and brings vehicles closer to residential neighborhoods, and certainly increases the likelihood of missing a flight because of the added time from being diverted and then being shuttled back to the terminal from a remote lot.

As an economic engine for the region, Logan needs to enhance its facilities to meet customers' needs as efficiently as possible with minimal impact on the environment and the surrounding neighborhoods.



In our view, Massport has done an exceptional job investing in alternative modes for accessing the airport, and many of our members take advantage of the subsidized services of the Silver Line and Logan Express, resulting in a best-in-nation HOV mode share. However, there are still many circumstances where these services are not available or accessible, especially for our members located outside and beyond I 495.

Travelers who cannot access alternative modes and who want to avoid being diverted to a secondary lot often ask a friend or family member to drop them off at the airport and pick them up when they return. That results in four vehicle trips to and from the airport whereas parking only results in two. Due to this, the federal EPA has recognized that a shortage of parking adds to overall vehicle miles traveled.

It is our understanding that Logan Airport is the only airport in the United States that operates under a parking freeze. The original goal of the freeze to reduce Carbon Monoxide (CO) emissions was a worthy one. After decades of technological improvement, emissions overall are down. It appears that raising the cap on the freeze now would reduce the number of vehicle trips and further reduce emissions, while providing a much-needed solution to Logan's persistent parking challenge.

To address current constraints and accommodate future passenger growth, Massport is proposing a measured increase in its on-airport parking as a component of their broader goals of customer service and community and environmental stewardship. We fully support this effort and encourage you to do the same.

Sincerely,



Richard C. Lord  
President & Chief Executive Officer

**From:** Lynds, Rebecca [<mailto:Rebecca.Lynds@betm.com>]  
**Sent:** Monday, May 08, 2017 1:13 PM  
**To:** Talks, DEP (DEP)  
**Subject:** 310 CMR 7.3 MASSPORT/LOGAN AIRPORT PARKING FREEZE

I am writing as a lifelong East Boston resident. The traffic in the morning trying to get into Boston is unbearable, and since taking away the toll booths and reducing lanes it has only gotten worse. This morning, at 8am when I left my house on Thurston Street in Orient Heights, it took me a full 45 minutes to get to the mouth of the tunnel. This was not due to tunnel traffic, as that was minimal. It was SOLELY due to the awful congestion on East Boston streets from the closing of lanes/diverting of streets getting to the mouth of the tunnel. This is ridiculous and unfair. East Boston residents should not have to bear the brunt of the traffic congestion caused by North Shore residents cutting through our streets. Furthermore, putting 5000 more parking spaces at Logan is only going to increase traffic, pollution, and make East Boston an unlivable community. I vehemently oppose the extra parking spaces, and the port authority/city NEED to figure out a way to REDUCE traffic for East Boston residents. If they want to make more revenue, charge a fee for incoming vehicles on the North Shore/ Winthrop who choose to cut through our streets. Have them buy transponders and pay not ONLY to go through the tunnel but to dissuade them from using local streets, charge them when they are not using the highway to get to the tunnel. Our community has had to suffer too much already with poor air quality and noise, we cannot and should not have to deal with horrendous traffic as well. We are a lower-middle class community resided by mostly and immigrant population. I see a class action lawsuit in Massport's future if they do not correct this, and FAST.

Thank you.

Rebecca Lynds  
4 Thurston Street  
East Boston, MA 02128

**From:** [tkmaddal@aol.com](mailto:tkmaddal@aol.com) [mailto:tkmaddal@aol.com]

**Sent:** Monday, May 08, 2017 10:28 PM

**To:** Talks, DEP (DEP)

**Subject:** 310 CMR 7.30 Massport-Logan Airport Parking Freeze

Karen Maddalena 4 Lamson Street East Boston, MA 02128

May 8, 2017

Mr. Glenn Keith Mass DEP Bureau of Air and Waster

One Winter Street, Boston MA 02108

Boston Ma 02108

Dear Mr. Keith

RE: 310 CMR 7.30 Massport-Logan Airport Parking Freeze

I am opposed to the lifting of the Parking Freeze requested by the Massachusetts Port Authority.

If the MPA would implement some of the changes mentioned below the request for the lifting of the parking freeze wouldn't be necessary.

- If the MPA would add more remote parking lots so cars don't have to go to the airport.
- Connect the Red and Blue rapid transit lines.
- Have all cars pay a toll East Boston to enter the airport.
- Charges to park and ride at the remote lots should be subsidized to encourage ridership.

Our community does not need more cars coming to Logan Airport we need a decrease.

Sincerely

Karen Maddalena

**From:** Chris Marchi [<mailto:cbmarchi@gmail.com>]  
**Sent:** Monday, May 08, 2017 12:55 PM  
**To:** Talks, DEP (DEP)  
**Subject:** 310 CMR 7.30 Massport/Logan Airport Parking Freeze

To Whom it may Concern:

I am completely opposed to adding any further parking at Logan.

As countless members of the community have testified at multiple airport, and DEP meetings over the past 2 years: I believe **we need solutions to our region's serious traffic crisis right now!**

Massport stands to earn \$40,000,000 more dollars per year on added parking, but this will do nothing to cut down on pollution as promised. When asked, Massport has failed to provide any credible evidence that those who choose to park at commercial parking rates would not otherwise choose fast, affordable, convenient and comfortable mass transit options IF THEY WERE AVAILABLE.

Instead, it is clear that this plan to add parking to Massport is all about #1. serving the needs of the air traveler (largely business travelers who will pay anything on their expense accounts for convenience) and #2. the money. Based upon an average 3 day stay, 5,000 additional parking spots could add 1,000,000 additional trips into and out of Boston, its tunnel system and East Boston, further congesting our roadways and adding to airport pollution.

Airport pollution is already a regional problem. Ignoring it, as the state has chosen to do over the past two decades, will make it worse. Already today, Logan airport airplane operations and the millions of passengers and related auto mode traffic congestion is choking our roadways, impairing the city's economy and causing hundreds of additional cases of asthma, COPD and other chronic disease in and around the city.

The state DEP and EOEPA have turned all airport expansion processes into a farce; overvaluing the airport's economic contributions to the state economy. In fact, there is no evidence that Logan airport adds anywhere near the value to Massachusetts economy that they boast. A recent study by an airport industry group; Airports Council International stated that on average, \$8.46 per passenger is spent at major airports. The rest of the money spent by air travelers, therefor, is spend in and around the destination cities and attractions which travelers choose to visit. This means that air travelers will continue to spend the huge majority of their travel dollars in and around Boston, ***the true engine of our economy.***

Please deny Massport's application for further parking until a fair, enforceable and reasonable agreement to fund and promote mass transit solutions for the region, and to create environmental mitigation which creates disincentives for passenger car mode travel to and from Logan is reached. Conservation Law Foundation could broker this plan.

Chris Marchi  
161 Saratoga Street  
East Boston, MA 02128

[cbmarchi@gmail.com](mailto:cbmarchi@gmail.com)



For a thriving New England

CLF Massachusetts 62 Summer Street  
Boston MA 02110  
P: 617.350.0990  
F: 617.350.4030  
www.clf.org

May 8, 2017

VIA EMAIL ([DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us))

Glenn Keith, Deputy Director for Air Quality Programs  
MassDEP  
One Winter Street  
Boston, MA 02108

RE: Proposed Amendments to 310 CMR 7.30, *Logan Airport Parking Freeze*

Dear Mr. Keith:

On behalf of the Conservation Law Foundation (CLF), I am writing in support of the Massachusetts Port Authority's (Massport) request to amend the Massachusetts Department of Environmental Protection (MassDEP) Massport/Logan Airport Parking Freeze regulations at 310 CMR 7.30. The Logan Airport Parking Freeze is a legal requirement of the current Massachusetts Clean Air Act (CAA) State Implementation Plan (SIP).

CLF is a nonprofit, member-supported, regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities for all in New England. CLF has a long-history of advocating for a more efficient, affordable, accessible, and sustainable transportation system and has supported and actively promoted the creation of parking freezes as part of a strategy to improve air quality in the region.

As you are aware from our oral testimony at MassDEP's public hearing on April 25, 2017, CLF originally did not support the proposed amendment to the Parking Freeze regulations. At the time, among other concerns, we expressed alarm about the lack of implementation of high-occupancy vehicle (HOV) projects and the misplaced focus on merely studying such efforts. We are now writing in support, because Massport, at CLF's request, has recently agreed to add substantial transportation mitigation measures and HOV-targets to its proposal. These measures and targets have been memorialized in a binding agreement with CLF and Massport will incorporate some of them in its Section 61 Findings as part of the Massachusetts Environmental Policy Act (MEPA) process for the parking garages.

### **Purpose of Massport-CLF Agreement**

Massport and CLF share the goal of reducing the overall environmental, emissions, and traffic impacts of travel to and from Logan Airport and encouraging an increase in the number and percentage of airport passengers who get to and from the airport by HOV-modes. To this

end, Massport and CLF have an agreement in principle, pending board approval, advancing these mutual objectives. Pursuant to the Massport-CLF Agreement, the proposed increase in parking supply at Logan Airport would not occur in isolation, but rather as one component of a multi-pronged comprehensive program to reduce the overall environmental, emissions, and traffic impact of ground transportation and ground-service equipment at the airport. This program has the explicit goal of encouraging an increasing number of passengers to travel to and from the airport by an HOV mode with a specific percentage increase required by a certain date and to increase electrification of the airport. CLF wholeheartedly supports this program.

Since 2002, Massport has invested close to \$160 million in HOV capital improvements. Massport currently spends \$33 million annually on HOV operations. These HOV investments have included the expansion of Logan Express sites (from two to five locations) and service, as well as financial support of Massachusetts Bay Transportation Authority (MBTA) Silver Line access to the airport, consisting of the purchase of eight buses for and free trips on the line from the airport terminals. Massport, as a result of its agreement with CLF, has now committed to build on these achievements and to implement substantial further capital and operational investments in HOV.

### **Specific Mitigation Measures and Targets included in Massport-CLF Agreement**

As part of its agreement with CLF, Massport will increase the share of air passengers using HOV modes to access Logan Airport to at least a 35.5 percent mode share by December 31, 2022 (the current HOV mode share is 30.5 percent). Massport will further increase the HOV mode share to 40 percent no later than December 31, 2027. The HOV mode share may only include taxi, livery, and Transportation Network Company (TNC) trips that have an average of at least 2.0 passengers per vehicle per trip.

In addition, as part of its agreement with CLF, Massport has agreed to the following specific improvements, projects, measures, incentives, and studies:

#### HOV Improvements:

- Purchase and support the operation of 16 Silver Line buses, replacing eight buses and adding another eight.
- Offer the approximately 18,000 employees based at Logan Airport free Blue Line service from the MBTA Airport Station by January of 2019.
- Increase Logan Express capacity, measured in available seats, by 10 percent by the end of 2019.

### Electrification Infrastructure:

- Increase the availability of electric vehicle charging stations so that 150% of demand for such infrastructure is available at all parking facilities at all times. In other words, no more than 66.667% of electric vehicle charging stations are to be in use at any one time.
- Provide high-speed electric vehicle charging stations at all taxi, livery, and TNC pools at Logan Airport by July 2019, so that 150% of demand for such infrastructure is available at all pools at all times. This demand will be measured as no more than 66.667% of electric vehicle charging stations to be in use at any time. All such electric vehicle charging stations will be provided at no cost to the user.
- Replace all ground service equipment, where commercially available electric alternatives are available by the end of 2027. By the beginning of construction of the parking garages at least 12% of the ground service equipment will be electric. By the time construction of the second parking structure is complete at least 24% of the ground service equipment will be electric.
- For those categories of equipment for which no electric or other zero emission alternative is commercially available by the end of 2027, replace such equipment within two (2) years of it becoming commercially available, provided that the equipment to be replaced is at least eight years old.
- Implement procedures so that at least 60 percent of commercial aircraft taxiing for a re-positioning purpose be done by electric tugs by 2027.

### HOV and Electrification Incentives:

- Establish a ride-share trip fee on a per-trip rather than per-person basis starting no later than January 1, 2019.
- Train ground transportation personnel to encourage passengers to share rides no later than January 1, 2019.
- Provide taxi/TNC-queue priority to electric vehicles, second only to vehicles with at least three passengers starting in January of 2019.
- Implement variable-rate parking within one year of opening of the new structured parking, if Massport's study (see below) demonstrates a sufficient positive mode-shift impact.

### Studies:

- Study the effectiveness of variable-rate pricing at the airport prior to the opening of the parking garages.

- Study the effectiveness of an airport pass-through rate prior to the opening of the parking garages.
- These analyses would be included in the studies referenced in the proposed amendment to the Logan Parking Freeze regulations and the SIP.

Massport has agreed to seek to include many of these improvements, projects, measures, incentives, and studies in its Section 61 Findings as part of the MEPA process for the new parking garages in addition to the Massport-CLF agreement.

### **HOV measure and projects benefit passengers, surrounding communities, and the planet**

While additional parking alone would at first appear customer-friendly to Logan travelers, the reality is that more parking yields more one- and two-passenger trips to the airport, increases congestion and reduces levels of service on already stressed tunnels, major arteries, and feeder roads, decreases customer confidence in timely arrival, and forces travelers to sacrifice more valuable time from work to avoid missed flights. This familiar pattern forces the somewhat counter-intuitive recognition that increased parking volume actually diminishes the travel experience for Logan passengers, rather than satisfying consumer needs. This same dynamic leads to significant impacts on the communities surrounding the airport, as more vehicle congestion compromises local air quality, local mobility, and the accessibility of small businesses to both customers and deliveries. The increased greenhouse gas emissions associated with such congestion are a further compelling concern and of great significance to the Commonwealth's goal to reduce greenhouse gas emissions from the transportation sector as part of the state's efforts to comply with the Global Warming Solutions Act.

At the same time, an analysis by Massport indicates that the constrained parking supply could cause 75% of passengers who would otherwise choose to park at Logan to instead use a private pick up/drop off mode. Curbside pickup and drop off generally generates up to four trips as compared to two for parking, thereby increasing vehicle miles traveled (VMT), emissions, and traffic. As a result, it would be neither sufficient to increase the availability of parking at the airport alone, nor to limit it without additional efforts to incentivize the use of HOV modes by passengers and others commuting to and from the airport.

CLF appreciates that Massport CEO Tom Glynn and the Port Authority's current leadership have recognized that parking expansion alone is not a sustainable solution for the long term. The program agreed to between Massport and CLF will implement a number of initiatives to build on the Port Authority's prior HOV efforts and make transit options more appealing to passengers and airport employees. Combined these efforts will substantially increase the HOV





mode share of ground transportation at the airport, while also electrifying ground-service equipment of the airport and encouraging an increase in zero emission vehicles traveling to and from the airport.

### **Conclusion**

There is no doubt that Massport is facing a major challenge in managing ground transportation to the airport as passenger volumes increase. An increase in the parking cap by 5,000 spaces alone would only have provided Logan Airport relief for a short period, generating a litany of adverse impacts. Therefore, Massport has now committed to implement smarter, more sustainable solutions to its ground-access challenges along with the increase in parking capacity. CLF supports this comprehensive approach and therefore the Port Authority's request to amend the Logan Parking Freeze Regulations.

CLF stands ready to answer any questions, supply any additional information, or assist the MassDEP and Massport in this matter. If you have any questions, I can be reached by phone at (617) 850-1739 or by email at [rmares@clf.org](mailto:rmares@clf.org).

Sincerely,

A handwritten signature in blue ink that reads "D. Paul Mares".

---

Vice President and Program Director  
Healthy Communities and Environmental Justice

May 8, 2017

Glenn Keith, MassDEP  
One Winter Street,  
Boston, MA 02108  
DEP.Talks@state.ma.us

To Whom It May Concern:

I am writing to encourage the approval of the amendment to the Logan Airport Parking Freeze and build more commercial parking at Logan Airport. While when I am able to I opt to take public transportation, there are times when driving to the airport is necessary. However, it is often difficult to find adequate parking, which causes me to drive around looking for a spot.

Logan Airport served a record 36 million passengers in 2016. Without adequate parking, there will be an increase in emissions due to what many passengers have experienced: driving around looking for parking or being diverted to overflow parking areas. Furthermore, a shortage of parking leads to an increased number of people driving friends and family to the airport, which results in four vehicle trips instead of two associated with parking. What seems to be a very common occurrence is that people drive to and from the airport to drop their family or friends off and then return home, and then again drive to and from the airport when they return—also idling while waiting to pick them up.

Although I have heard that Logan has one of the highest rates of passengers using public transit and other HOV options, there are instances where travelers need to park instead. For instance, transporting my children to the airport in their car seats. Massport has made various investments to reduce emissions, from creation, support and promotion of HOV modes to a consolidated Rental Car Center bus fleet with new, fuel-efficient buses.

Those efforts, coupled with the fact that additional parking will decrease the amount of emissions and circulation at the airport and on local roads, is why I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces.

Sincerely,

Timothy McMillan

**From:** Jane O'Reilly [<mailto:oreillyjane05@gmail.com>]  
**Sent:** Monday, May 08, 2017 8:47 AM  
**To:** Talks, DEP (DEP)  
**Subject:** 310 CMR 7.30 Massport/Logan Airport Parking Freeze

A freeze is a freeze, especially a freeze negotiated in good faith, crucial to the physical health of the community, and strongly opposed by the community. The endless productions of more parking spaces on the part of the airport authority simply proves the need for a regional airport with high speed transportation. Logan has outgrown its space. It is destroying part of the city of Boston and is long overdue for an upgrade in another less urban place.

Jane O'Reilly

150 Orleans street #407

East Boston 02128

**From:** Deanne Peterson [<mailto:deannerpeterson@gmail.com>]

**Sent:** Saturday, May 06, 2017 3:31 PM

**To:** Talks, DEP (DEP)

**Subject:** Logan Airport Parking

Glenn Keith, MassDEP

One Winter Street,

Boston, MA 02108

[DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us)

Dear Mr. Keith;

I am writing to support the amendment to the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. It is my understanding that Logan Airport is the only airport in the country to operate under a Parking Freeze, which limits commercial parking regardless of demand. Despite the increased number of passengers using of the airport, no parking has been added. This results in many passengers spending an inordinate amount of time and effort to have their car valet, moved, or circulated looking for parking. Parking capacity at Logan Airport has not come close to keeping pace with passenger growth. As a result, demand for parking exceeds supply on a regular basis. On-Airport parking is a necessity.

I support the amendment of the Logan Airport Parking Freeze to build 5,000 additional parking spaces at Logan Airport. I encourage you to do the same.

Sincerely,

Deanne R. Peterson

18 Farwell Place

Cambridge, MA 02138

[deannerpeterson@gmail.com](mailto:deannerpeterson@gmail.com)

May 7, 2017

Glenn Keith, MassDEP  
One Winter Street,  
Boston, MA 02108  
DEP.Talks@state.ma.us

To Whom It May Concern:

I am writing to encourage the approval of the amendment to the Logan Airport Parking Freeze and build more commercial parking at Logan Airport. While when I am able to I opt to take public transportation, there are times when driving to the airport is necessary. However, it is often difficult to find adequate parking, which causes me to drive around looking for a spot.

Logan Airport served a record 36 million passengers in 2016. Without adequate parking, there will be an increase in emissions due to what many passengers have experienced: driving around looking for parking or being diverted to overflow parking areas. Furthermore, a shortage of parking leads to an increased number of people driving friends and family to the airport, which results in four vehicle trips instead of two associated with parking. What seems to be a very common occurrence is that people drive to and from the airport to drop their family or friends off and then return home, and then again drive to and from the airport when they return—also idling while waiting to pick them up.

Although I have heard that Logan has one of the highest rates of passengers using public transit and other HOV options, there are instances where travelers need to park instead. For instance, transporting my children to the airport in their car seats. Massport has made various investments to reduce emissions, from creation, support and promotion of HOV modes to a consolidated Rental Car Center bus fleet with new, fuel-efficient buses.

Those efforts, coupled with the fact that additional parking will decrease the amount of emissions and circulation at the airport and on local roads, is why I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces.

Sincerely,

Emily Peterson

**Date:** May 8, 2017

**From:** Frederick P. Salvucci

**Tel:** (617) 253-5378

**Email:** Salvucci@mit.edu

**Subject:** Comment to DEP on proposal to increase the Logan Parking limit by 5000

I am writing to oppose the increase in the Logan parking limit, and urge that EPA to initiate a much more thorough review of methods to reverse the worsening congestion in the cross harbor tunnels which threatens regional access to Logan, and the accessibility of East Boston, Winthrop and Revere to the region, and to reverse the worsening congestion within the terminal roadway system, and at curbside within the terminals.

The primary purpose of the Logan parking freeze as modified in the late 1980s was to limit the auto trip generation of Logan to volumes that can be managed by the finite capacity of the expanded roadway network including the addition of the Ted Williams Tunnel, and expansion of the capacity of the Central Artery. It was recognized that the then contemplated expansion of Logan Airport terminal capacity would unlock significant new need for access to Logan, and Massport and the predecessor of MassDOT and MBTA agreed to a combination of the parking limit at Logan and East Boston, and the expansions in public transportation capacity including Logan Express and MBTA services to provide adequate alternatives to automobile access in order to maintain reasonable flow conditions in the tunnels and the Central Artery. These agreements were incorporated in the agreement between the Secretary of Transportation and the Conservation Law Foundation of December 1990, the votes of the Boston MPO, including the positive votes of Massport, the MBTA and the Secretary of Transportation, approving the modification of the State Implementation Plan to include these limits and transit expansions and policies in December of 1990; the final Supplemental EIR on the I-90/I-93 Expansion approved by the Secretary of Environmental Affairs in January of 1991; the DEP approvals in 1991 of the ventilation facilities of the I90/I-93 expansion project; the 1993 SIP revision approved by DEP; various environmental filings by Massport including the so called LADS and LOGIC processes to constrain the adverse environmental impacts of airport operations; and several Administrative Consent Orders agreed to by the transportation agencies and the Attorney General in the late 1990's and early 2000; a federal court agreement in settlement of a lawsuit by CLF and the city of Somerville and MassDOT in 2006; and a revised SIP approved by DEP in 2007.

The facts are that the most important of the agreed upon expansions of public transit capacity<sup>1</sup> have not occurred, and the traffic congestion on regional highways including the Ted Williams and Sumner and Callahan Tunnels and local East Boston streets that disappeared when the new roadway capacity was completed in the late 1990's and early 2000's has returned and is worsening, causing economic harm and unnecessary air pollution.

The document presented by DEP for comment, relying primarily on analysis prepared by Massport is significantly inadequate, and should be revised and expanded to include consideration and analysis of more significant alternatives to remedy the growing traffic congestion and air quality problems. Let me comment on the deficiencies in the document, which should be corrected, and presented to the public for further comment:

1. Many of the aspects of the current process are backwards from a logical sequence. For example, Massport is processing a MEPA filing on the construction of a 5,000 space garage, when the environmental impacts of the garage cannot be adequately understood without the information and analysis which should be included and considered in the DEP regulatory process concerning whether the limit should be increased, and if so, by how much, and with what complementary and parallel actions as may be required.
2. The DEP proposal includes approving the increase in the limit by 5,000 cars, and then considering and planning other actions to deal with the increased traffic congestion and pollution, and alternative pricing structures, when the planning for other significant actions, and pricing strategies should precede any consideration of increasing the parking limit.
3. The primary over utilization of parking occurs during peak periods of the year, when many non-frequent passengers are using the airport for vacation related travel. It is likely that this subset of travelers might be particularly susceptible to change in travel behavior by use of peak pricing of parking charges, as proposed in an op Ed in the Boston Globe by professor Glaeser of Harvard University. The surcharge could be "revenue neutral", by using the proceeds to lower the price and increasing the frequency of Logan express bus service, for example. This could provide a very visible and inexpensive opportunity to try pricing strategies in real pilot experiments, rather than simply with paper analysis.
4. Since the construction of a large garage will inevitably cause disruption to existing conditions of traffic flow experienced by current passengers, and take considerable time (7 years), Massport will need to take other actions immediately to provide reasonable conditions during the interim period. Those methods of dealing with the immediate

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<sup>1</sup> The replacement of the Orange Line fleet with new vehicles scheduled to begin in 1995, the extension of the Green Line to Medford originally committed to be in operation by 2011, and the extension of the Blue Line to Charles Street, to be in operation by 2010.

situation must be known to Massport at this time, and should be described to the public. These immediate actions are likely to be more successful and obviate the need for the construction of added spaces, at very high cost in dollars (approximately \$250 million), and significant additional traffic disruption by construction trucking related to the garage construction.

5. The primary focus of the document is on how to reduce the frustration of air passengers seeking to park at Logan, which is an important issue, but largely ignores the even larger problem encountered by air passengers and in getting to Logan Airport and to East Boston, Winthrop and Revere residents in accessing the region caused by growing congestion in the tunnels.
6. The document focuses on the "drop off /pick up" phenomenon, but fails to consider that the driving factor in causing people to be dropped off and picked up at Logan is the high cost of parking at Logan, and the absence of convenient alternative methods to access Logan.
7. The methodology and survey analysis included in the appendices is based on the responses by drivers to absence of parking availability, but the people interviewed in the survey are basing their responses on the current lack of availability of alternatives such as expanded Logan express capacity and convenience, and the current pricing structure of various options. Without considering the possibility of different and expanded options to access Logan, and different pricing structures, the methodology pre ordains that the only conclusion will be to expand the number of spaces.
8. The analysis fails to consider that the document shows a decline in proportional usage in alternatives such as Logan Express over the past decade, which occurred during a period when Massport was not offering any expansion in supply. In fairness to current director Glynn, he has reversed some of the previous Massport inaction. Notably, when he implemented the expansion of the Framingham Logan Express facility, the public response was to immediately fill the new garage capacity, showing considerable public latent demand for improved Logan Express capacity and availability. Improved levels and fare structure of the express bus connections from Logan Express to passengers who are dropped off at Logan express locations would almost certainly attract more utilization. But this possibility is not considered because the methodology of the survey has embedded within it several decades of ignoring the need to constantly improve services, and current proportional preferences are presumed not changed.
9. The analysis fails to consider the likely response of Massport pricing policy to the proposed expanded parking capacity. Once the facility is built, Massport will adopt policies to financially optimize the use of the expensive new capacity, so the garage it is likely to fill



immediately. But the prices will continue to be high, both because of the high cost of constructing the facility, and because of the high market demand. So the response of drop off/pick up passengers is likely to be to continue their current behavior. The additional spaces are likely to attract passengers from other modes including the Logan Express and transit modes that are far preferable to drive and park access in terms of reducing congestion in the tunnels and in the Logan terminal roadways. It is at least possible that Massport may well reduce the level of express bus service to Logan Express sites, and increase its price in order to maximize the cost recovery of the new garage. The long period when Massport failed to maintain its quality of Logan Express is certainly indicative of this risk.

Moreover recent the worsening of direct access from the Blue Line station to the air terminals, by diverting the bus shuttle service to serve the rent a car facility prior to proceeding to the terminals, apparently for budget reasons is an ominous sign that the Massport response to the added parking availability will be to slack off or lessen its attention to the most superior Logan Express and transit options. So the net effect of the addition of 5,000 spaces could well be an equal or larger number of drop off/ pick up movements, and a decrease in utilization of Logan Express and transit, causing a further worsening of conditions in the tunnels.

10. The analysis in the appendices correctly predicts no decrease in the existing drop off and pick up behavior. These passengers are responding to current available alternatives and prices, which Massport is not proposing to change. So the entire analysis is on how the net new passengers will behave. But the analysis should examine ways to modify incentives to reduce drop off and increase options like Logan Express.
11. The "drop off/ pick up" activity is a real problem, as Massport has known for decades. It causes confusion and traffic disruption at the limited curb space at terminals, as well as exacerbating the congestion in the Logan terminal roadways and regional tunnels and other roadways. The new availability of Uber access is likely to worsen the situation at the curbside. But to change that behavior, which has persisted and grown for decades, and deal with the new challenges posed by Uber, will require the implementation of a clear strategy with improved alternatives and changed prices. One possibility is to require a payment for access to the terminals by all vehicles, so that the drop off/pick up option will no longer seem to be "free" when all other options, including parking and Logan express cost money. With the new availability of electronic tolling, it should be possible for Massport to asses a charge on any vehicle which enters the airport, and perhaps an extra fee for vehicles which enter the terminal curbside. A combination of charging each dropped off or pick up a fee, and lowering the price of using Logan Express could better align the prices to the need to improve flow and reduce congestion both at curbside and in the tunnels. A less complex option could be to charge a fee to use the "cell phone lot" required for pick up vehicles to not

complicate the curbside. These new fees could be “revenue neutral”. By lowering parking charges, and paying for improved Logan Express service through the landing fees, as legitimate for air passenger expenses. There may be many other options, but the point is the current situation where drop off and pick up are perceived as free, while Logan Express, and parking cost money, will continue to result in a growing drop off/ pick up problem whether or not 5,000 spaces are added.

12. The most significant flaw in the analysis is that Massport proposes no action to convert the existing drop off/pick up passengers to other less problematic modes. So the proposed additional parking is to accommodate added trips on top of the current increasingly unacceptable solution, thus leading inexorably to worsened conditions.
13. The data in the appendix indicates that an inordinate amount<sup>2</sup> of the automobile activity at Logan is caused by the “less than four hour” category of parkers. It would appear that this is likely facilitated by the current parking charge structure, and should be a target for consideration of how to reduce the frequency of auto use on the terminal roadways and tunnels, through provision of attractive alternatives and pricing changes.
14. Similarly, the number of employees who drive is still a significant generator of traffic notwithstanding the option for Massport to convert some of the 2,448 employee spaces to much higher revenue potential as passenger spaces, which would generate far less traffic than employee spaces which turn over twice a day. The fact that Massport has not attempted to incentivize employees to use transit through providing transit passes to all employees, as MIT has recently initiated, suggests that there is considerable room for improvement in this area.
15. It is clear in reviewing the increase in traffic congestion that the failure to upgrade the MBTA as required in the DEP regulations has been a major factor in the worsening of traffic congestion. The fact that MBTA had to reduce the frequency of rapid transit service because of failing vehicles from a five minute headway to a significantly less robust service on the Orange Line has decreased capacity by over 20 per cent, while passenger demand has increased so crowding on transit has increased, fares have increased faster than inflation, while the fuel cost of automobile has been cut in half by improved fuel economy of autos. Renewed efforts to improve the capacity and quality of transit, and maintain affordable fares are needed to avoid even worsening traffic congestion.
16. But it is also clear that there are problems totally within the control of Massport to remedy in terms of improving the pricing and frequency of Logan Express service, and modifying pricing at Logan roadways and garages that could make a significant difference without changing the limit on parking. An extended analysis and comment period for both Massport

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<sup>2</sup> The appendix states that 46% of airport exits is generated by 2% of the spaces.

initiatives and MBTA improvements are warranted, and should be required by DEP prior to any consideration of changing the parking freeze.

17. Massachusetts statutory commitment to take effective action to moderate climate change will likely require the retention and strengthening of the parking freeze as well as other actions at Logan. The document does not consider that the climate change plan of Massachusetts relies heavily on the fuel economy automobile regulations negotiated with the automobile industry by the Obama administration. But the unfortunate reality is that the auto industry has now appealed to the Trump administration to drop any intent to continue to enforce these regulations. This places a much heavier reliance on infrastructure regulation by the state, if Massachusetts wants to continue as a leader in recognizing the threat of climate change, and in taking effective action to moderate it.

The regulation of parking and especially the parking freeze is an important tool to regulate the excessive use of the automobile which leads to congestion and excessive amounts of vehicle hours travelled, and resulting greenhouse gas generation. Even with more electric cars (which have thus far not become a significant part of the Massachusetts automobile fleet), the energy comes from the generation of power which will continue to be carbon based for decades to come. So the replacement of auto travel with increased public transportation capacity, quality, and usage will continue to be an essential part of a multifaceted strategy. The parking freezes which have been part of the regulatory framework in Massachusetts since 1973 are very important building blocks. They are not perfect, and undoubtedly need to be strengthened and improved, but they are essential tools for the state, and DEP should be considering how to strengthen them, not render them meaningless by increasing the limit just when approaching the limit is providing the attention needed to consider how to do a better job of implementing them.

18. It is also relevant to recognize that Logan airport is a significant generator of greenhouse gas and air pollution. It is clear that the Boston economy requires airport service for connection to the global economy. But when the last round of terminal expansion occurred at Logan in the late 1980s, it was recognized that there are spatial and environmental limits to how much air service should be generated at Logan, and Massport embraced a regionalization strategy that encouraged the growth of regional airports at Providence, Manchester, Worcester and Bradley, to not overly concentrate on Logan. In addition, there was serious advocacy for improved high speed rail to New York and other important destinations within 250 miles, so that the expanding services to very distant locations like Asia, where there is no practical substitute for air travel, could displace air services to New York and other destinations reasonably reached by rail.

Massachusetts has the opportunity of significant improved inland route rail service to New York via Worcester and Springfield and Hartford, simultaneously supplementing the services via Providence (which are now experiencing rail congestion in competition for track space with commuter rail), and also helping to revitalize regional cities such as Springfield, Worcester, and Hartford. Unfortunately, the philosophy at Massport changed from the regional approach to an “everything at Logan” priority, which exacerbates the capacity constraints which lead to more noise exposure and air pollution in ground access, trucking, and air taxi activities. In addition, Massport has ignored the requirements of the environmental requirements attached to adding runway 14-32, whereby there were to be better congestion reduction strategies such as congestion pricing of landing fees, and better efforts to direct overflight over water and away from densely populated, close in areas like East Boston, Chelsea, Winthrop, and Revere. Given the importance of the growth in projected air passenger in Massport’s justification for adding parking, it is important to reconsider the appropriateness of Massport’s change in philosophy. This review of the DEP regulation of parking could and should provide the basis for a review of the overall role of Logan, and regional airports, and improved regional rail services in serving the Massachusetts economy with less pollution and climate change environmental impact.

19. Finally, it is essential to consider the Environmental Justice elements of the Logan operations and the role of the parking freeze in particular. For decades the surrounding communities have been concerned with what appear to be elevated experience of respiratory ailments in the communities closest to Logan. These concerns have been validated by studies by the Massachusetts Department of Public Health. But there has been no urgent action plan to reduce these effects, and the sources of pollution that are likely the cause of them. It does not matter if the source of the air pollution is from landing and takeoff of aircraft, from taxi operations of aircraft, from trucking activity bringing air cargo to Logan, or from commuter auto travel to Logan combined with that to downtown causing congestion, excessive vehicle hours of travel and pollution. It is the cumulative impact that matters to public health, and this needs to be an important element of any consideration of weakening the already insufficient regulations to protect the public health in nearby communities. In the appendix, it indicates that the monitoring of CO, and HC and NOX near the Sumner Tunnel was suspended in the 1990’s when the problem seemed to have abated. I certainly hope that air quality is better. But the backup queues from the congested Sumner Tunnel entrance filling every side street in East Boston approaching the Sumner Tunnel, which disappeared with the opening of the Ted Williams Tunnel are now back, and it is a serious concern that the excessive concentration of air pollution, especially ultra-fine particles may be again beyond any reasonable limit. But we won’t know if there is a problem, nor consider how to eliminate the problem, unless we first measure it and analyze it.

Finally, the side deal negotiated by Massport with community leaders is offensive to environmental justice principles because it is contingent on the community losing its voice in policy, and relying on further worsening of an already bad situation in order to get the benefits in the community fund.

The basis of mitigation should not be as a price for silence. Mitigation ought to first and foremost be about avoiding and minimizing impact, not being paid to accept pollution. The fact that the deal is structured as contingent on the Permission to Massport to construct the garage makes it a major flaw in the community outreach process. If Massport, as a matter of good neighbor policy wants to engage the community and provide funding for little league and elderly drop in centers and parkland, that is very good, but it ought to be in recognition off the substantial past adverse impact suffered by airport neighbors, and in no way contingent on acceptance of further adverse impact. DEP should advise Massport to remove the contingent element from the community agreement.

The “don't ask don't tell” strategy of ignoring the environmental justice issues at Logan has been restored and deepened for too long. This review by DEP should take the environmental justice responsibility very seriously, and use this review to develop the basic information, and analysis, and develop the strategies to eliminate these problems, and require action by the responsible parties, which almost certainly include Massport first and foremost, but also MassDOT and MBTA.

20. I am also enclosing my comment letter to Secretary Beaton on the MEPA review of Massport's proposed garage for your consideration, as it includes more specific alternatives that should be considered.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Fred Salvucci". The signature is written in a cursive, flowing style.

Frederick Salvucci

Frederick Salvucci  
6 Leicester Street  
Brighton, MA 02135

May 2, 2017

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

**Re: Proposed Logan addition of 5,000 parking spaces**

Dear Secretary Beaton,

Thank you for the opportunity to comment on the ENF on Massport's proposal to add 5,000 parking spaces to Logan Airport.

The proposal by Massport should be deferred until a comprehensive set of alternatives should be developed, with public participation, for alternatives to adding parking spaces to an airport which is already generating far too much traffic in the limited capacity of the cross harbor tunnels. By their own studies, Massport is now causing the generation of 60 to 65 % of the traffic in the Ted Williams Tunnel, and the Sumner and Callahan tunnels.

This statistic raises several disturbing questions:

The Big Dig added significant net new capacity to cross Boston Harbor, and reach Logan Airport, and the communities of East Boston, Winthrop, Revere, and Chelsea. The Big Dig more than doubled this capacity, but it is now becoming congested again only about a decade after completion of the project. This recongestion was not supposed to occur. The combination of the 1989 amended parking limit, and the addition of substantial new transit and Logan express capacity to allow passengers to reach Logan without their cars were supposed to keep the auto growth to not exceed the capacity of the tunnels, and to fairly share the new capacity with the four nearby communities. But Logan auto destinations are growing much too fast, so that the capacity of the tunnels are now frequently exceeded, causing a return of the congestion and air pollution that the tunnel expansion, along with more transit alternatives, were supposed to preclude. The net result is a return of congestion and air pollution, and an unfair share of the capacity being dominated by Massport.

It is not news that Massport and MassDOT needed to add significant transit opportunities to keep pace with passenger growth, and maintain auto use below reasonable levels. Massport and MassDOT have had almost thirty years to achieve the transit investments and other related actions required. The fact that they have failed should not allow them to build more parking, to make more money from parking fees, as a reward for not doing the transit investments required to retain reasonable congestion free flow in the critical tunnels. Let me suggest some actions and studies that Massport should be required to carry out before any consideration should be given to additional parking:

1. Massport should be required to build the underpass for the Silver Line at D Street in South Boston that is required to improve travel time reliability and capacity on the Silver Line connection to Logan airport. This grade separation will enhance the value of the Massport real estate that it rests upon, and would improve the operating conditions of D Street necessary to the functioning of the Seaport /Innovation District, where Massport owns significant real estate and seaport assets, and is a reasonable responsibility of Massport.
2. Massport should institute any safety inspection required to allow the Silver Line to use the "state police" ramp, which is the most direct route for the Silver Line to Logan, the route that was presented to the public and approved in the environmental process which add the Silver Line connection to Logan to the South Boston Transitway during the 1990s.
3. Massport should reinstitute the direct shuttle from Logan Airport Station on the Blue Line to the Logan terminals, with direct services to terminals A and B, and C and E, as existed before Massport modified the routing to introduce the Rent-a-car facility between the Blue Line station and the air terminals, thereby degrading the service which Massport had improved in the 1980's.
4. Massport should institute free or very low cost bus service from Logan express sites, at double the current frequencies, and market the opportunity for Logan employees and passengers to be dropped off and picked up by friends or taxicabs or Uber and Lyft or local transit to the Logan Express site, with Massport providing the frequent and convenient and very low cost express bus connection to Logan. Massport should also be required to add at least two new Logan Express suburban facilities with at least 2,000 parking spaces at suburban locations to improve accessibility to Logan without auto use.
5. Massport should introduce an exit fee to access Logan Airport, to be collected electronically from every vehicle which enters Logan, whether they park or not. This fee should be set high enough to reduce auto travel into Logan to below the capacity of the existing garages, and use the revenue to construct new Logan Express facilities, and fund increased frequency low cost express bus services from Logan Express to Logan. In addition, the fees should contribute financial support to MassDOT to construct the long delayed Blue to Red connector, in order to improve Logan accessibility by transit. Finally this fee should generate a revenue stream to contribute to the proper maintenance of the I-90 and Sumner and Callahan tunnels, which are critical to Logan access.
6. Massport should initiate a public awareness campaign to notify the public that there is likely to be low parking availability at Logan, and to encourage the use of taxicabs, and Uber and Lyft to access Logan without their autos. Massport lumps together taxicab and Uber and Lyft access with drop off and pick up, without recognizing that a well-regulated taxi and Uber/Lyft operation can match the one round trip by auto record of access of parking in the Logan garage. Massport should be required to work first with the taxicab industry to market the taxicab access model for trips not conveniently served by public transit, to give the cabs which have served Logan for decades first crack at this expandable market.
7. Massport should initiate free transit passes to all airport employees, similar to the recent initiative at MIT, to encourage Massport and airport and concessionaire employees to use public transportation, and release employee parking spaces for general air passenger use.
8. Massport should also be required to contribute to MBTA all night service that will provide access to Airport employees during all hours.

9. Massport should be required to initiate the above actions, and commission independent studies to evaluate the most successful initiatives to be expanded in the future.
10. Massport should also be required to initiate a new planning process to recognize that they have abandoned the commitments made in the 1980-1990 period to encourage regionalization of air travel demand, and encourage its dispersion to Rhode Island, New Hampshire and Connecticut, and to high speed rail to New York via both Rhode Island and Worcester and Springfield, in order to not over stress the capacity of Logan. Massport should be required to develop anew this regionalization strategy in cooperation with neighboring states and AMTRACK.
11. Massport should be required to do a new conceptual plan for how Logan can possibly handle the air demand that it is generating with its airline subsidy policies, and review the physical constraints of the site. Very specifically, there should be no added garage construction at Logan until there is a new master plan that is comprehensive and identifies how the increased level of activity anticipated over the next twenty years can be accommodated on available airport land, and at what cost.
12. Massport should be required to fund independent public health and environmental justice studies of the cumulative impact of current levels of air pollution generated by all Logan related activities, including truck and aviation related NOX and Co2, to establish an honest baseline, against which any new traffic generation will need to be evaluated. It is a long recognized problem in environmental justice communities that it is the toxic mix of pollution from all sources that impacts the health of neighbors, in particular vulnerable neighbors who are elderly, young of rail. So it is essential to establish the current cumulative baseline. Identify means to reduce those levels, and then add the expected increment from any new initiative that may be considered.
13. Massport should be required to fund an independent assessment of the contribution of Logan to climate change gas generation, specifically including aviation generation of climate change gases like NOX.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Frederick P Salvucci". The signature is written in a cursive, flowing style with a large initial "F".

Frederick P Salvucci



(617) 569-3200  
FAX (617) 561-8471

**CHANNEL FISH CO., INC.**  
370 EAST EAGLE STREET  
EAST BOSTON, MASSACHUSETTS 02128-2571



Glenn Keith  
MassDEP  
Bureau of Air and Waste  
1 Winter St.  
Boston, MA 02108

RE: 310 CMR 7.30 Massport/Logan Airport Parking Freeze

Dear Mr. Keith:

I am writing to express my concern about the proposal to lift the 1989 parking freeze, which would allow Massport to move forward with their plans to construct facilities to allow new parking for 5,000 cars.

First, and foremost, I am concerned that the analysis of the environmental impact of the additional spaces is inadequate. Such an analysis should be comprehensive, and should go beyond the overly simplistic view that additional parking spaces might lead to fewer trips, by reducing the overall number of "kiss and drop trips." A comprehensive analysis should include the following:

- An analysis of how many additional car trips would be taken by airport patrons who might now choose to drive to the airport with easier on-site parking, instead of taking one of the shuttles or MBTA. The additional parking access could lead to many people abandoning the shuttle services and driving themselves because of convenience.
- The analysis should be done in the context of the proposed Expansion of Terminal E, and the understanding that over time, the airport's traffic will increase with this expansion and increased capacity.
  - A "worst-case" environmental impact scenario should be calculated and assessed, using the current baseline of "kiss and drops," paired with the maximum potential impact of the new parking spaces and the added congestion in East Boston. This is not a farfetched scenario, and could easily be the case over time.

Second, the **community should get the lion's share, if not all of the revenue from any new parking spaces.** This, and all mitigation from this project, should be done in a transparent and public process that can be reviewed and assessed by all in the community. **All related mitigation should be done in day light and not be a backroom deal.** It should be laid to bear in public for all to assess and comment on before going into effect.

Third, if the aim of Massport is truly to reduce environmental impacts from car trips, alternative measures should be seriously considered and evaluated alongside it. Possible alternatives include:

1. Construction of additional infrastructure to better connect the airport terminals to the MBTA Airport Station, using either trams or moving walk ways.
2. Construction of additional off-site Logan Express terminals, with increased frequencies and lower costs.
3. Introducing an exit fee to access Logan Airport, to be collected electronically from every vehicle which enters Logan, whether they park or not. This fee should be set high enough to reduce auto travel into

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Logan, and the revenue should be used to construct new Logan Express facilities. This idea has been forwarded by Former Secretary of Trans. Salvucci.

This parking freeze is sacred in East Boston. It should not be modified without an exhaustion of all alternatives, a robust and transparent public hearing process, and substantial mitigation from the beneficiaries to the community.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis A. Silvestro", written over a thin horizontal line.

Louis A. Silvestro  
President,  
Channel Fish Co., Inc.

**From:** Dennis Sullivan [<mailto:djsullivan@gmail.com>]  
**Sent:** Friday, April 28, 2017 8:16 PM  
**To:** Talks, DEP (DEP)  
**Subject:** Additional Parking at Logan Airport

Whom It May Concern:

I am writing to support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. Despite the increased number of passengers using of the airport, no parking has been added to accommodate traveling passengers like myself. This results in many passengers ultimately having their car valeted at Logan, or having to park off of the Logan campus, using local roads.

Parking capacity has not come close to keeping pace with passenger growth. As a result, demand for parking exceeds supply on a regular basis. Without adequate parking, we will see more travelers driving around looking for parking or being diverted to overflow parking areas, which subjects the surrounding communities to increased vehicle idling, rerouting cars, and higher emissions.

I understand that more people use HOV options to get to Logan than to any other airport in the country thanks to the fact that there is much more availability of HOV seats and options.

However, for those who are not traveling from a location proximate to the city and public transportation or an alternative mode, parking at Logan is a necessity.

I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces at Logan Airport. I encourage you to do the same.

Sincerely,

Dennis Sullivan

Somerville, MA

**From:** Kannan Thiru [<mailto:sillicilantro@gmail.com>]  
**Sent:** Friday, May 05, 2017 1:23 PM  
**To:** Talks, DEP (DEP)  
**Subject:** Massport Parking freeze lifting

Greetings.

I am a resident of East Boston.

What is the point of a "parking freeze" if it can be lifted as needed?

--

[Kannan](#)  
(1) 617-335-2278

May 8, 2017

Glenn Keith  
Bureau of Air and Waste  
Massachusetts Department of Environmental Protection  
One Winter Street, 2<sup>nd</sup> Floor  
Boston, MA 02108

Re: Proposed Amendment to Massport/Logan Airport Parking Freeze Regulation  
310 CMR 7.30

Dear Mr. Keith:

Please accept these comments on the above-referenced regulatory changes on behalf of Airport Impact Relief, Inc. (AIR). AIR is an East Boston-based non-profit organization with a mission to reduce adverse airport impacts on the community and to work for the establishment of sound transportation and environmental policy to guide the operation and development of Logan Airport. In furtherance of this mission, we respectfully submit the following comments on this proposed regulatory change:

1. The necessity for the proposed regulatory change is not supported by the data submitted by Massport.

Massport has claimed that “limiting the commercial parking supply at Logan Airport to its currently constrained (capped) level under the Logan Parking Freeze is now having the unintended effect of negatively impacting air quality. Recent analysis shows that constrained parking supply at Logan Airport causes 75% of passengers who would otherwise choose to park to use a private pick up/drop off mode, thereby resulting in up to four trips to the Airport rather than two.” This conclusion is not supported by the results of the 2013 Logan Airport Passenger Ground Access Survey upon which it relies. According to Massport, the Ground Access Survey was administered to all flyers, regardless of the type of transportation they used to get to/from the airport. This includes travelers who took the MBTA as well as “parkers.” Therefore, the data does not support the conclusion that Massport relies on to make its case for more on-airport parking.

2. The previous amendment to the Logan Airport Parking Freeze in 1989 did not rely exclusively on increasing the number of commercial spots at Logan Airport to lessen the pick up/drop off phenomenon.

In 1989, DEP amended the parking freeze regulations by regulating employee and commercial parking spaces, by promoting transportation control measures, by increasing the number of commercial spaces by 2000 spaces, and by allowing the number of commercial spaces to increase in direct proportion to the number of employee parking spaces permanently removed from use at the airport. 58 Fed. Reg. 14153. It was the combination of all of these measures that was supposed to improve air quality, not just an increase in the number of allowed parking spaces on the airport property. As previously stated, there is no evidence that simply increasing the parking cap at the airport will achieve the sought-after air-quality improvements and reductions in vehicle miles travelled. Before such a step is taken, Massport should be required to study all of the alternatives to increasing commercial parking to determine whether another solution is possible.

3. The addition of 5000 new parking spaces at Logan Airport will not resolve the problem of congestion in the access tunnels or constrained parking at the Airport.

By their own analysis, an increase in the number of parking spaces at Logan Airport by 5000 will only temporarily meet the expected demand. As they state in their own Policy Memorandum, “if growth trends continue as they have in recent years..., the requested relief in the cap of 5,000 spaces will provide enough potential capacity on airport to support less than 5 years of peak-day parking demand growth.” (Policy Memorandum, p. 44). Such a policy change should not be pursued for only a short-term potential benefit. Instead, other methods of increasing the HOV share should precede an amendment of the parking freeze. Several such methods have been outlined in public testimony and comment letters on this proposed amendment. At a minimum, Massport should be required to undertake the studies that they are proposing to do after the regulatory change before such changes are made. These studies may indicate an alternative path to amending the State Implementation Plan.

4. There has been no Environmental Justice analysis of this project, nor any Title VI analysis.

The Massachusetts Department of Environmental Protection must require Massport to assess the impact of this proposed project and regulatory change on the impacted Environmental Justice communities. There has, to date, been no such analysis done by the project proponent. Indeed, a review of the distribution list for the Environmental Notification Form for the project reflects a lack of concern for this aspect of the project. No Environmental Justice staff at the state or federal level received a copy of the Environmental Notification Form. Before this proposed regulatory change can be approved, such an analysis must be performed. Further, depending on the type of funding that the project will require, a Title VI review may also be appropriate.

Thank you for the opportunity to submit these comments on the proposed regulatory amendments. If you have any questions or comments about this letter, please feel free to contact me at [aaron.toffler@gmail.com](mailto:aaron.toffler@gmail.com) or (617) 821-3497.

Very truly yours,

Aaron Toffler, Esq.  
On behalf of Airport Impact Relief, Inc.

cc: Deborah Szaro, Acting Regional Administrator, EPA Region 1  
Deneen Simpson, Massachusetts Department of Environmental Protection  
Sharon Wells, Director, Office of Civil Rights, EPA Region 1

**From:** Alyssa Vangeli [<mailto:avangeli@gmail.com>]  
**Sent:** Monday, May 08, 2017 4:44 PM  
**To:** Talks, DEP (DEP)  
**Subject:** Public comment on Logan Airport Parking Freeze

Dear Mr. Keith,

Thank you for the opportunity to submit comments regarding MassPort's request to construct 5,000 more parking spaces at Logan Airport. I have lived in East Boston for 8 years and the smell of air pollution has gotten consistently worse. In fact, approximately 4-5 days/week I'm unable to bring my 2.5 year old daughter to play outside or go for a run myself because of the overwhelming smell of jet exhaust, and I constantly worry about the health of my soon-to-be born second child as I am currently 8 months pregnant.

I am completely opposed to Logan Airport building more parking spaces, which will fundamentally lead to more greenhouse gas emissions and more traffic. MassPort can and should plan for the future, but truly forward-thinking entities understand that they do not need to build expensive and wasteful parking garages.

Instead of presenting a proposal to spend \$250 million on parking spaces, MassPort should be required to document - now - what the impact would be on traffic and the environment if the agency invested \$250 million in transit and high-occupancy modes instead.

MassPort should survey its passengers to understand what ground transportation services they'd like to see in the future, instead of making the decision for them.

MassPort should also be required to use current data in its analysis. The information presented uses data from 2014. This is before Uber/Lyft/Transportation Network Companies (TNCs) were legally allowed to pickup/dropoff from Logan. Since TNCs are a new service at Logan, MassPort should be presenting data about their use and impact, and making decisions based on projections about their growth.

MassPort should not be allowed to build 5,000 parking spaces without also investing in high-occupancy travel modes. The proposal just obligates MassPort to evaluate/study alternative transportation proposals, but not necessarily to do anything with these studies. If MassPort wants to build parking, the agency should be required to invest the same amount in transit and other high-occupancy travel modes at the same time.

There are many opportunities to get passengers to Logan that do not include building parking - increasing Logan Express service, changing the trip and parking rate structures on Logan Express, invest in more frequent and direct Silver Line service, being more transparent to passengers and airlines about allowing TNCs, allowing taxis from municipalities outside of Boston, incentivizing TNCs and taxis to not travel to and from Logan with an empty backseat, working with municipalities to get priority bus lanes, etc. Many of these opportunities are a lot cheaper than building parking.



At minimum, MassPort should not be permitted to build 5,000 spaces at once - if parking is built, the spaces should be phased in at the same time that the agency invests in non-parking infrastructure and services.

More parking means more traffic. With congested tunnels and roadways, passengers do not want to sit in (more) traffic to get to Logan. If MassPort provides ground travel options that were as attractive and convenient as parking, people will use them.

Thank you for your consideration and for the opportunity to comment.

Alyssa Vangeli  
198 Everett Street  
East Boston, MA 02128  
[978-807-6089](tel:978-807-6089)

From: Shannon Viera [<mailto:shannonviera@yahoo.com>]  
Sent: Monday, May 08, 2017 2:47 PM  
To: Talks, DEP (DEP)  
Subject: Parking free at Logan

To whom it may concern,

As a resident on Winthrop Ma, I am writing to protest against the expansion of Parking at Logan. Traffic in and around the area is at an all time high, making access in and out of Winthrop slow and frustrating. Adding more parking with increase the numbers of cars accessing Logan daily and directly impact the quality of life for those of us living here.

Please help to prevent furthering the frustrations of those of us in the immediate vicinity of Logan.

Thank you,  
Shannon Viera  
64 Read St  
Winthrop, MA 02152  
617-699-1040

May 8, 2017

Glenn Keith  
MassDEP  
Bureau of Air and Waste  
One Winter Street  
Boston, MA 02108  
[ sent by email to: DEP.Talks@state.ma.us ]

Re: **310 CMR 7.30 Massport/Logan Airport Parking Freeze**

Dear Mr. Keith:

As an East Boston resident I want to thank you for this opportunity to provide comments on the referenced regulatory change and to strongly urge you to require that Massport provide additional information before any alteration of this important air protection regulation is altered as they have not justified the lifting of the parking freeze based on their current analysis.

There are a number of issues that should be addressed before the Commonwealth can justify putting the health of Massport's neighbors at risk with the additional traffic and parking that this measure would cause.

1. Massport's argument for lifting the parking freeze is based entirely on the issue of so-called "kiss and fly" trips versus air travelers leaving their cars at the airport (four car trips versus two car trips respectively). What is not included in their analysis is the effect of low-cost, highly effective *disincentives* to the "kiss and fly" trips. The installation of overhead gantries, identical to the toll fare collection systems installed on the Ted Williams and Sumner/Callahan Tunnels as well as the Tobin Bridge and Mass Pike, could be used to assess a fee to every vehicle entering the airport. Those cars that park would be discounted this fee from their parking expense while those that were dropping off air travelers would have to pay this amount to Massport. This would dissuade the "kiss and fly" trips and promote use of public transportation which ultimately is our goal regarding limiting vehicle traffic to the airport.

This option was not considered in their analysis nor included as an option in their user surveys. Therefore Massport is requiring the Commonwealth to take on a capital expense and for the community to bear a substantial additional traffic burden, in terms of worsening road congestion and air pollution, when another, potentially more cost-effective and environmentally beneficial option is available and has not even been considered. This option should be studied before the parking freeze is lifted and permission given to go ahead with a 5,000 car parking garage.

2. In addition to the above measure, additional investments in park and fly bus facilities outside of the urban core should be considered beyond what is currently in place. In particular the Peabody site should be evaluated as to why its ridership falls so far behind those that come from points west and south. For Lynn, Revere, Chelsea and East Boston residents it is the traffic coming from the North Shore that is congesting our streets and Massport is a major driver of this traffic. Additional investments should be made in subsidized express bus transit to the airport from points on the North Shore. Massport has shown its willingness to subsidize bus transit to the South Boston waterfront, so it should now provide some of this benefit to those of us suffering to the north. There was no consideration of this option in their proposal.
3. Despite multiple meetings with community representatives and stakeholders where requests were made for the actual data and surveys used by Massport in their studies and models, we have never received anything more than power point slides of presentation materials. Massport releases a voluminous Environmental Data Report every year, which similarly does not provide access to actual data but presentations of data that provide little opportunity for independent assessment. Through the community group Airport Impact Relief, Inc. (AIR Inc.), the neighbors of Massport have access to some of the world's leading public health professionals who are willing to work on these data, however short of pursuing Freedom of Information requests, we have not been able to pry data from Massport's hands. We would ask that MassDEP assist in pressuring Massport for the release of these data to the public.
4. A basic premise of Massport's argument is flawed transportation thinking – increased capacity will resolve congestion. Just as in adding lanes to a highway, adding capacity to transportation has been shown time and again to simply result in that capacity is used up and congestion again returning. This phenomenon of induced demand has been proven time and again on our nation's highways and in the case of parking (and airplane capacity at Terminal E) at Logan Airport it stands to reason that if we are *already* breaching the parking cap (although not collecting revenue for it) on a regular basis – the argument for adding the garage – then once the garage is there we will fill it and then be at the same point once again. What prevents Masspot from coming back every five years to request (and receive) *another* lifting of the parking cap?

We are not addressing the underlying issue of the development plan of the airport and just looking at one small component of it. This leads to unsustainable and environmentally damaging solutions. Massport should provide its solution to the long term growth that it has whipped up over the past decade that honestly presents a sustainable solution to ground access needs which does not unduly burden their neighbors.

5. At a very basic level the most objectionable part of this process is the fact that it is yet one more tiny step within a larger development plan that the Massport and the State has put together for the expansion of Logan International Airport that does not include opportunity

for the most affected members of the public to comment or to even see what the plan in its entirety actually is. The lifting of the parking freeze is related to the additional parking which is related to the expansion of Terminal E which is related to over a decade of aggressive international marketing of the airport. However when it comes time to assess the impact of this larger, tremendously impactful development plan we are told to focus on one tiny aspect in isolation – such as the parking freeze.

The air quality impact of the lifting of the parking freeze should be considered in light of the cumulative impact of increased flights into the airport, increased traffic of service vehicles (which should be required to all convert to CNG vehicles), increased passenger vehicles (taxis, Uber, Lyft, etc.) and personal vehicle traffic. The cumulative public health impacts of air pollution from ground and air vehicles, increased noise, increased traffic congestion, wear and tear on road infrastructure and the accompanying repair (and associated pollution from dirty diesel construction equipment), etc. are never actually evaluated. This is a criminal disservice to the community and ultimately should be considered a dereliction of the duty of MassDEP to protect the environment and the public health of the residents of the Commonwealth.

6. Finally, despite the availability of Spanish translation at the public meetings, there has been woefully inadequate consideration of the fact that the impacted neighboring communities are in large part Environmental Justice communities with traditionally some of the highest rates of childhood hospitalizations due to asthma in the nation. There is a very clear disparate impact on the EJ communities that must put up with the additional air pollution, stress from traffic and noise and general inconvenience compounding already very deficient health indicators. Nowhere in Massport's study does this aspect meaningfully appear. The parking freeze was put in place to safeguard the air quality and quality of life for the urban population living near the airport. This same population has been disregarded in Massport's argument for the lifting of this parking freeze. Until such time that a transparent and comprehensive EJ analysis is done the parking freeze should remain in place.

In closing I again strongly urge you to maintain the current parking cap until such time that Massport is able to reasonably and transparently address the concerns that have been raised here and in the other comment letters that you are sure to have received.

Respectfully yours,



John Walkey  
63 Putnam Street #1  
East Boston, MA 02128



May 8th 2017

Glenn Keith  
MassDEP, Bureau of Air and Waste  
One Winter Street, Boston, MA 02108

Re: 310 CMR 7.30 Massport/Logan Airport Parking Freeze  
CC: Speaker Robert DeLeo, Robert L. Driscoll, Jr., Winthrop Town Council President

Dear Mr. Keith,

On behalf of the Winthrop Transportation Advisory Committee, I am writing to express our fervent opposition to MassPort's request to construct 5,000 more parking spaces at Logan Airport. In this era of established state goals for greenhouse gas reduction, growing demand and market share of ride hailing services/transportation network companies, and heavy and growing traffic congestion in a geographically restricted area, it is unfathomable to us that state agencies are even considering permitting more parking spaces at the airport, thus inviting more private vehicles to congest and pollute our cities. An entity as innovative as MassPort surely understands this irony, and we hope that you do, too.

While we recognize that congestion has increased as number of daily flights and passengers at Logan have increased, **we do not believe that building more parking is the solution**. Many large institutions, cities, and employment centers around the world have grown in square footage and activity substantially without adding parking. One of the best examples locally of this is Kendall Square, which [added four million sq ft of development with no net new car trips](#). MassPort can and should plan for the future, but truly forward-thinking entities understand that they do not need to build expensive and wasteful parking garages which often perpetuate the problems they seek to resolve.

We encourage you to seriously question the basis of Massport's Environmental Notification Form (ENF) which makes unfounded claims about... "additional- on airport parking, the benefits of reduced drop-off/pick up activity, anticipated air quality improvement...". The arguments put forth by Massport fail substantially in terms of support data. It is an unsupported allegation that allowing construction of 5,000 parking spaces will cause a 20-25% reduction in toxic particles. Assuming that allegation to be a fact, the anticipated additional flights will more than off-set Massport's allegation of a reduction. There will be an increase in VOC's, MO, CO, and PM. There will be additional noise from additional flights. And our community will suffer directly.

There are absolutely no facts or data to support the theory of more on airport parking will generate a substantial reduction in the drop-off/pick-up of airport users. Many of today's drop-off/pick up users are late for flights and rush to be dropped off and will continue to do so regardless of parking availability.

There are many opportunities to get passengers to Logan that do not include building parking - increasing Logan Express service, changing the trip and parking rate structures on Logan Express, invest in more frequent and direct Silver Line service, being more transparent to passengers and airlines about allowing TNCs, allowing taxis from municipalities outside of Boston, incentivizing TNCs and taxis to not travel to and from Logan with an empty backseat, working with municipalities to get priority bus lanes, etc. Many of these opportunities are a lot cheaper than building parking.

At minimum, MassPort should not be permitted to build 5,000 spaces at once - if parking is built, the spaces should be phased in at the same time that the agency invests in non-parking infrastructure and services.

More parking means more traffic. As an immediate neighbor of Logan, the repercussions of that increased traffic will be felt most intensely by our community. With congested tunnels and roadways, passengers do not want to sit in (more) traffic to get to Logan. If MassPort provides ground travel options that were as attractive and convenient as parking, people will use them.

Thank you for your consideration and for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Julia Prange Wallerice".

Julia Prange Wallerice, Chair

Winthrop Transportation Committee

Members: Stephen Hines, Christopher Aiello, Jerome Falbo, Charles Southworth

**From:** Elizabeth & Justin Ward [<mailto:ekgward@gmail.com>]

**Sent:** Monday, May 08, 2017 8:54 AM

**To:** Talks, DEP (DEP)

**Subject:** Logan - Parking

To Whom It May Concern:

I am writing to support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 parking spaces at Logan Airport. Despite the increased number of passengers using of the airport, no parking has been added to accommodate traveling passengers like myself. This results in many passengers ultimately having their car valeted at Logan, or having to park off of the Logan campus, using local roads.

Parking capacity has not come close to keeping pace with passenger growth. As a result, demand for parking exceeds supply on a regular basis. Without adequate parking, we will see more travelers driving around looking for parking or being diverted to overflow parking areas, which subjects the surrounding communities to increased vehicle idling, rerouting cars, and higher emissions.

I understand that more people use HOV options to get to Logan than to any other airport in the country thanks to the fact that there is much more availability of HOV seats and options.

However, for those who are not traveling from a location proximate to the city and public transportation or an alternative mode, parking at Logan is a necessity.

I support Massport's request to amend the Logan Airport Parking Freeze and build 5,000 additional parking spaces at Logan Airport. I encourage you to do the same.

Sincerely,  
Elizabeth Ward



**From:** Mary Ellen Welch [<mailto:maryellen225@yahoo.com>]

**Sent:** Monday, May 08, 2017 4:37 PM

**To:** Talks, DEP (DEP)

**Subject:**

Dear Mr Keith,

This is a letter of opposition to the Port Authority proposal to lift the parking freeze at Logan Airport. Instead of adding more parking spaces at the airport the M.P.A. should do other things to accommodate additional passengers .

The air pollution impacts on East Boston from aircraft operations are the cause of serious health problems like childhood asthma and serious respiratory illnesses in adults. We have research from well known scientists which details the effects of exposure to pollution from operations at the airport.

The M.P.A. should build additional remote parking lots in the suburbs and transport passengers to the airport on safe high occupancy vehicles. The Port Authority should charge cars which enter the airport a fee which would discourage individual car trips and provide funds to the M.P.A to build the remote lots and other things to reduce the environmental impacts of airport pollution.

In addition the Port Authority should contribute financial resources to the MBTA to finally construct a "Red-Blue Connector" transit to the airport. which would allow passengers from the Cambridge side of the area to take efficient transit. This particular project was supposed to be done along with the Big Dig as mitigation. Now is the time to make this project a reality. It would be a good thing for the people who go to the hospitals and colleges in that area as well/

There is a lot of new congestion at the tunnels in East Boston. This was an issue that got better after the Ted was constructed. In recent years the back up at the tunnels has increased a lot. This creates pollution in Central Square and seeps into the residential areas as well.

Another approach could be a regionalization of certain domestic flights to make more room on land and in the air for the increase in international flights at Logan. More use of the regional airports such as Manchester and Greene to lessen the parking and traffic congestion here. It would help the economy in those areas of New England. This would give truth to the description of the airport as "the economic engine of the region."

In the context of environmental an all out effort to reduce the negative impacts of airport operations communities like East Boston and Chelsea bear the brunt of airport expansion. Therefore the expansion program must be slowed down. The airport leaders and the leaders at the other environmental watchdog agencies should work with residents of the impacted communities and environmental scientists to plan together for airport efficiency and controlled growth.

The airport is not going away. The residents are here to stay. So we must work together to create a healthier environment for all of us. My hope is that this entreaty does not fall on deaf ears.

Sincerely,

Mary Ellen Welch

225 Webster Street

East Noston Massachusetts 02128

**From:** PAUL [<mailto:dlrespaul@yahoo.com>]

**Sent:** Saturday, April 15, 2017 8:15 PM

**To:** Talks, DEP (DEP)

**Subject:** 310 CMR 7.30: Logan Airport Parking Freeze Amendments

I am in favor of additional parking on airport property or expanding the Chelsea parking lots ONLY if additional parking spots are tied to construction of the Rt. 1A & Boardman St. Flyover FIRST to reduce Air Pollution impact on Orient Heights residents now caused by Massport's State Police detail that prioritizes Logan traffic on Rt. 1A. The detail backs up traffic in Orient Heights on Boardman and Saratoga Steets, as well as increases traffic on Bennington, Walley and Waldemar from Rt. 1A traffic avoiding the backup caused by the detail.

Paul Vignoli  
116 Waldemar Ave  
East Boston MA 02128

John Vitagliano  
19 Seymour Street  
Winthrop, MA 02152  
Seagullconsult@msn.com

April 28, 2017

Glenn Keith  
MassDEP  
One Winter Street  
Boston, MA 02108  
Subject: Logan Parking Freeze Amendments

Dear Mr. Keith:

I endorse the proposed amendments to the Logan Airport Parking Freeze, 310 CMR 7.30. The proposed amendments would allow an additional 5,000 commercial parking spaces at Logan International and require the Massachusetts Port Authority to complete several studies to evaluate ways to further support alternative transit and HOV options to the airport, as follows:

1. 310 CMR 7.30(3) Parking Space Inventory – amend to require Massport to submit its 6- month parking inventory by March 1st and September 1st of each year, and make other minor changes.
2. 310 CMR 7.30(4) Employee Parking Reduction – amend to reflect the fact that Massport has completed implementing its plan for converting employee parking spaces to commercial spaces.
3. 310 CMR 7.30(6) Rental Motor Vehicle Parking – delete this section since Massport completed the relocation of rental car spaces from the East Boston Freeze area onto Logan Airport with the completion of the Consolidated Rental Car Facility in 2013.
4. 310 CMR 7.30(8) Transportation Management Studies and Programs – delete two prior transportation studies that were required under the 1989 Amendment and were completed, and replace with a requirement to submit the following three new studies within 24 months of the date of adoption of the regulatory amendment:
  - a) A study of the feasibility and effectiveness of potential measures to improve high occupancy vehicle access to Logan Airport. The study will consider, among other things, possible improvements to Logan Express bus service and the benefit of adding additional Silver Line buses with service to Logan Airport.
  - b) A study assessing different parking pricing strategies to affect customer behavior and VMT.
  - c) A study of the feasibility and effectiveness of potential operational measures to reduce pick-up / drop-off modes of access to Logan Airport.

Specify that Massport should maintain and improve its Logan Express bus service in all areas around Boston, rather than just in the western and South Shore locations specified in the 1989 Amendment.

5. 310 CMR 7.30(9) Recordkeeping and Reporting – amend to allow Massport to satisfy its annual reporting requirements through its submission of annual Environmental Data Reports or similar airport-wide documents required under the Massachusetts Environmental Policy Act (MEPA), M.G.L. ch. 30, ss. 61 – 62H.

The original Logan parking freeze was implemented some thirty-five years ago when vehicular exhaust emissions were dramatically higher than current levels. Massport's program for adding 5,000 sorely needed parking spaces at Logan Airport would be accommodated in state-of-the-art parking facilities that

include substantial numbers of electric vehicle re-charging stations as an incentive for motorists driving emission free vehicles.

I have lived in the immediate vicinity of Logan Airport all of my life, Winthrop and East Boston, and would never endorse any proposal for the airport that I felt was environmentally deleterious in any manner.

Thank you,

*John Vitagliano*

**From:** Wig Zamore [<mailto:wigzamore@gmail.com>]

**Sent:** Monday, May 08, 2017 4:58 PM

**To:** Talks, DEP (DEP)

**Subject:** PROPOSED AMENDMENTS to 310 CMR 730 Logan Airport Parking Freeze

To Glenn Keith, MassDEP, One Winter Street, Boston, MA 02108

Dear Mr. Keith,

Please accept this with attached comment letter to MEPA and the subsequent emails I will forward with peer reviewed journal papers containing scientific evidence in the next few minutes as my comment on the proposed amendments to 310 CMR 7.30 Logan Airport Parking freeze. (Note period "." in "730" intentionally left off of email subject.) In general I feel that there is no need to amend the SIP language until MassPort has completed the Parking Garage EIRs with best possible transit alternatives fully analyzed. To advance the SIP language and amendment without the analyses flies in the face of scientific and regulatory logic, and legal precedent.

Best Regards, Wig Zamore

Wig Zamore  
13 Highland Ave. #3,  
Somerville MA 02143  
617-625-5630  
[wigzamore@gmail.com](mailto:wigzamore@gmail.com)

April 25, 2017

Secretary of Energy and Environmental Affairs  
Executive Office of Energy and Environmental Affairs (EEA)  
Attn: MEPA Office  
*Page Czepiga, EEA No. 15665*  
100 Cambridge Street, Suite 900  
Boston MA 02114

Via email to: [page.czepiga@state.ma.us](mailto:page.czepiga@state.ma.us)

**Re: Logan Airport Parking Project ENF 15665**

Dear Secretary Beaton,

Notwithstanding great progress over the last four decades in controlling air and noise pollution in the US, our large and growing regional transportation systems continue to be the largest sector of urban economies whose environmental and health impacts present the most challenges. Barring dramatic increases in personal isolation via more complete reliance on electronic communication, which would have unfortunate social effects, residents and workers of great global cities like Boston cannot easily disentangle themselves from the transportation systems upon which they rely in their daily lives - to work, to shop, to recreate, to learn. And to enjoy family, friends and nature. The opportunities for transportation driven environmental exposures are large. And their management and mitigation very difficult relative to stationary sources.

Logan Airport and its operations are the single largest source of air pollution and noise in New England. Surface transportation is an important component of Logan's local and regional impacts. Those impacts cannot be eliminated, but they must be managed through the collaboration of MassPort, its workers and users, neighbors, and other impacted citizens. MassPort has contributed much toward mitigation - through provision of local green space, through support for public transit and other multi-occupancy vehicles, and through adoption of cleaner buildings, lower emission energy sources and streamlined operations such as CONRAC and its new cleaner on-airport bus system. The ENF also details a process that resulted in two well-considered sites for the proposed new customer garages with an additional 5000 customer parking spaces.

Air pollution operates on the environment and health at various spatio-temporal scales - including the very local, regional and global. Although the Clean Air Act

initially focused on very local exposures such as carbon monoxide and lead and large particulates, in more recent decades US EPA has focused almost entirely on regional secondary pollutants like ozone and fine particulates. Eastern Massachusetts complies with ozone and PM2.5 NAAQS at this date. However, our ozone standards would be tighter, and Massachusetts likely out of compliance, if CASAC's advice had been more closely followed in recent agency decisions. More ominously, PM2.5 is considered to have NO SAFE THRESHOLD above natural background, and to have a log linear dose response curve. Meaning that halving the pollution does not halve the impacts.

At the very local scale, EPA and those states which rely on EPA's regulatory framework are very far behind current environmental health science. Primary air pollution from large nearby transportation emissions sources has much steeper health impact gradients than regional secondary pollution. Thus local populations living within 50 to 100 meters of large surface roadways, or other similar scale emission facilities, should expect to experience 50% or greater risk, all other factors being equal, of cardiovascular and lung cancer mortality, and of childhood asthma. They should also expect even greater increased risk of autism spectrum disorders in children who spent their first years of life in such locations. Adult cognitive decline is also elevated, and more rapid, in locations near large local transportation emissions sources and facilities.

Regarding global spatio-temporal scale and climate change, transportation is the US economic sector with the single largest impact. Surface transportation is the largest subsector and aviation, as a whole, the fastest growing component in advanced western economies. Scientists and government bodies with in-house science capacity have increasingly focused on Short Lived Climate Pollutants (SLCPs) in their effort to reduce the pace of climate change. This includes focus on sources of Black Carbon such as diesel and Jet A fuel. Per unit of mass, Black Carbon (BC) has 3200 times the impact of emitted CO2 over twenty years - i.e., GWP20. There is no reason that MassPort, the Boston MPO and MassDEP cannot include SLCPs, most importantly BC, in climate assessments. We do not have to reinvent the science to do this. Just apply it!

With regard to the strategy and tactics of Logan related surface transportation, we all need to be braver. Over and over again the Logan Parking ENF refers to the pressure on curbside Kiss-n-Drop trips whenever there is insufficient garage capacity at Logan. Have we never considered charging for private auto access to Logan for this purpose? MassPort charges for everything but what is most problematic. Now that MassDOT has transponder based highway tolling why not charge for curbside Kiss-n-Drop? And how much of a charge, coterminous with expanded public transit, would be required to obviate the need for any new garages? In all these years of garage and parking freeze expansions, have we not explored and learned the sensitivity of charging for drop off and pick-up trips to Logan. Of course, there are many other tactics to also consider.

Most importantly, Phase 3 of the Urban Ring, before its progress was put on hold, was to have been clean circumferential light rail transit with a projected ridership of roughly 300,000 trips per day, more than the Red or Green Lines, and vastly greater than the whole commuter rail system. Urban Ring Phase 3 would unite the Kendall

Square and Longwood Medical Area research economies, provide huge transit capacity to the core through alleviated trips in and out, connect low income service workers with the most expansive parts of Boston's tech and life sciences activities, and intercept all large regional surface radial surface transportation facilities, road and rail based. With implementation of Phase 3 Urban Ring, Logan would not have to build another parking space and our economy, including the struggling Gateway Cities, would hum!

MassPort ought to operate Logan with a real target of 50% or greater clean transit and HOV, 50% or less private autos and low occupancy vehicles, and work with all of us to accomplish that as soon as possible.

With Best Regards, Wig Zamore



