MAPC
METROPOLITAN AREA PLANNING COUNCIL

SMART GROWTH AND REGIONAL COLLABORATION

April 25, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Page Czepiga, MEPA #15665
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Logan Airport Parking Project, MEPA #15665

Dear Secretary Beaton:

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 policy 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 also has established a mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking by 2030. 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 Port Authority (Massport) has submitted an Environmental Notification Form (ENF) for the Logan Airport Parking Project (the Project). Specifically, the Project plans to construct additional parking by adding spaces atop the existing Economy Garage and above the existing Terminal E surface parking lot at Logan International Airport (Logan Airport). Potential phasing of the Project is still being developed, however 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 at Logan Airport. According to the ENF, the Project will reduce drop-off/pick-up activity at the airport and will reduce regional air passenger-related Vehicle Miles Traveled (VMT) and associated vehicle air emissions.

Logan Airport has been subject to the Logan Airport Parking Freeze (310 CMR 7.30) on the number of commercial parking spaces there since 1975. In June 2016, Massport, the owner and operator of the airport, submitted a proposal to the Massachusetts Department of Environmental Protection (MassDEP) to amend the 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. The Project is contingent upon MassDEP amending the Logan Airport Parking Freeze. Massport has filed this ENF concurrent with MassDEP's issuance of a draft regulation to amend 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 inadvertently cause people who customarily use transit, shared-rides, and other HOV modes to access Logan Airport by single occupant vehicle (SOV) instead.

Currently, the mode share of transit and HOV access to Logan Airport is about 30%, a percentage which has remained relatively constant since 2004. Having the unique advantage of being in close proximity to downtown Boston, Massport should look to continue serving as a model to other landowners and building operators by exploring ways to maximize the use of multimodal transportation options to the airport (e.g., Blue Line, Silver Line, water transport, Logan Express). It is paramount that Massport continue to support strategies to enhance transit, shared-rides and HOV as ways to reduce SOV trips. Simply allowing for an increase in parking spaces could have the inadvertent consequence of undermining these non-SOV alternatives.

Following are MAPC's comments and concerns that address Massport's ENF, along with recommendations that would enhance transit, shared-ride, and HOV access to and from Logan Airport. We respectfully request that the Secretary require Massport to include the following when the Certificate is issued for preparation of the Environmental Impact Report (EIR) and for inclusion in the Section 61 findings.

<u>Proposed Studies</u>
MAPC applauds Massport for proposing to undertake three studies intended to aid their long-range efforts to address VMT and air quality impacts of different ground access modes for travel to and from Logan Airport, but we believe it is essential that Massport *first* conduct these studies and *then* implement their recommendations *before* increasing the number of commercial parking spaces. The three proposed studies are:

1. *Ways to improve HOV access to the Airport*
Evaluate the feasibility and effectiveness of potential measures to improve HOV access to Logan Airport. The study would consider, among other things, possible improvements to Logan Express bus service, additional Logan Express sites, and the benefit of improvements to the Silver Line service to Logan Airport.

2. *Strategies for reducing drop-off/pick-up modes*
Evaluate the feasibility and effectiveness of potential operational measures to reduce drop-off/pick-up modes of access to Logan Airport.

3. *Parking pricing strategies*
Assess parking pricing strategies and their effect on customer behavior and VMT.

<u>Transportation Network Company (TNC) Trips</u>
Given Massport's concern regarding pick up and drop off activity and the resulting air quality degradation, MAPC is surprised that the ENF does not include any discussion of TNC trips (e.g., Uber, Lyft, Fasten), or any plan to analyze TNC trips in the EIR. The recent onset of TNC services 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 now that TNC's are allowed to pick up at Logan Airport as of February 1, 2017. For example, in the recently released report, *Unsustainable? The Growth of App-Based Ride Services and Traffic,*

Travel and the Future of New York City[1] 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 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[2]. This is higher than the overall 22% increase for the New York metropolitan area as a whole.

MAPC recognizes that due to their rapid growth and ready availability, app-based ride hailing options could present a challenge to airport ground operations. MAPC requests that Massport analyze, as part of the scope for the EIR, the extent to which TNC trips are impacting access to and from Logan Airport. 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 notes that, in a footnote, the ENF states that "[f]uture parking trends (such as transportation network companies [for example, Uber and Lyft], driverless cars, and reduced car ownership in urban areas) may impact demand further into the future; however, given the current understanding of these issues, they are not anticipated to impact the analysis presented in this ENF over the relatively near-term timeframe." *(p. 2-28)* MAPC, who has been closely following the rapidly evolving industries of TNCs and autonomous vehicles, respectfully disagrees with this assumption. In fact, we think it highly likely that TNCs are already having a sizeable impact on travel patterns, and they influence is almost certain to grow between now and the time the requested parking spaces are built.

<u>Pick-Up/Drop-Off Activity and Fee Structure</u>

According to Massport, pick-up/drop-off vehicle activity is growing due to the constrained parking supply. As a result, 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 the Airport remains the same, this will continue to cause an increase in both vehicle trips and curbside congestion due to pick-up/drop-off activity by private vehicles.

Our perspective is that the link between the lack of parking and pick-up/drop-off activity, while plausible, is not proven, and providing that proof should be a considerable objective of the EIR.

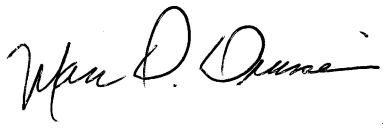
One option to discourage drop-off and pick-up of air passengers is to consider implementing a drop-off/pick-up fee. Such a fee could improve air quality by reducing idling as well as encouraging the use of other modes of travel, such as public transit. For example, Dallas/Fort Worth International Airport charges a fee for both parking and pass-through activity. The airport's parking fee structure discourages air passenger pick-up/drop-off by charging $4 for 0-8 minutes and then drops the fee to $2 for 8-30 minutes[3]. At major airports in Great Britain, private vehicles must pay for the convenience of loading or unloading of passengers at airport entrances. MAPC requests that Massport prepare a study that evaluates the incorporation of fees for pick-up/drop-off activity.

[1] Schaller Consulting, February 2017.
[2] Table 2. Combined Taxi/TNC trips, 2013 to 2016.
[3] Parking fees at Logan Airport increase incrementally over time.

First and foremost, Massport's ground transportation strategy needs to maximize the use of transit, shared-rides, and HOV modes of travel to and from Logan Airport. Respectfully, we believe it is essential that Massport *first* conduct these studies and *then* implement their recommendations *before* increasing the number of commercial parking spaces. The need for additional, robust measures is confirmed by Massport's own statement that the proposed parking increase will provide enough capacity to meet projected demand for less than 5 years[4]. Impacts at Logan Airport have a large impact on our regional transportation system and air quality and 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.

Thank you for the opportunity to comment.

Sincerely,



Marc D. Draisen
Executive Director

cc: Thomas P. Glynn, CEO, Massport
Martin Suuberg, Commissioner, MassDEP
David Mohler, MassDOT

[4] ENF, Attachment 5, p. 5-44.