



SMART GROWTH AND REGIONAL COLLABORATION

July 26, 2019

Kathleen Theoharides, 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, DEIR, MEPA #15665

Dear Secretary Theoharides:

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*. Furthermore, the Commonwealth encourages an increased role for bicycling, transit and walking to meet our transportation needs while reducing traffic congestion and vehicle emissions. Additionally, 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.

The Massachusetts Port Authority (Massport) has submitted a Draft Environmental Impact Report (DEIR)/Environmental Assessment (EA) for the Logan Airport Parking Project (the Project). This DEIR is combined with a Federal EA for review by the Federal Aviation Administration (FAA) under the National Environmental Policy Act (NEPA).

This Project addresses implementation of Massport's plan to add 5,000 new on-Airport commercial parking spaces at Boston-Logan International Airport. Massport plans to construct the additional parking in two locations: approximately 2,000 spaces are proposed to be added in a new garage in front of Terminal E where there is an existing surface parking lot, and an additional 3,000 spaces are planned to be added to the existing Economy Garage.

Our comment letter focuses on two key matters: 1) Massport's commitment to conduct three studies and 2) phasing of garage construction.

Commitment to Conduct Three Studies

As part of the amendment to the Parking Freeze, which was also echoed in the Secretary's Certificate¹, one of Massport's mitigation commitments to MassDEP was to complete three studies within 24 months of June 30, 2017.

These three studies will address the following:

1. *Ways to Improve High Occupancy Vehicle (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,

¹ ENF Certificate dated May 5, 2017.

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 Vehicle Miles Traveled (VMT).

We are concerned to see that the DEIR/EA was filed with MEPA prior to the completion of these studies, which will provide useful information for evaluating the project and its mitigation. The availability of these studies will be critical to the Final Environmental Impact Report (FEIR) as they should be used to inform the mitigation measures for the project and identify ways to further support alternative transit options to and from the airport. These studies will also inform Massport's long-range efforts to address VMT and air quality impacts of different ground access modes to and from Logan Airport.

It is important that all three studies be finalized and available prior to the issuance of the FEIR, and that the data and findings be integrated into the FEIR and particularly the mitigation commitments as appropriate. In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary incorporate this recommendation as part of the Certificate on the Draft EIR.

Phasing of Garage Construction

Massport proposes to first construct approximately 2,000 spaces in a new garage in front of Terminal E followed by approximately 3,000 spaces at the Economy Garage through an expansion of the existing facility. Construction of the garage in front of Terminal E is expected to begin in spring 2020 and be complete in 2022. Construction of the Economy Garage expansion is due to begin in 2023 and be complete by the end of 2025.

MAPC respectfully requests that Massport monitor the performance of the first facility after it is in operation, and use that information to reevaluate the timing, and to what extent, there is a need to construct the second phase of 3,000 additional parking spaces.

Plans for future adaptability of structured parking should be explored for potential productive reuse of the space, should parking demand decrease in the future due to changes in travel mode, Transportation Networking Companies (TNC), or other causes.

Transportation Network Company Trip Sharing

MAPC is pleased that Massport, as part of a parallel effort, is evaluating mechanisms to reduce TNC deadheading. With respect to TNC operations, shared-ride pick up trips will be incentivized with a discounted fee of \$1.50^{2,3}. Providing a reduced fee for shared pick up trips is a strong motivating factor to reduce trips and should be heavily promoted and marketed by Massport to passengers. Ride sharing is one of the most effective ways to reduce congestion, as there are fewer vehicles on the roadway network. Significant adoption of shared rides will be a contributing factor to Massport's new ground transportation plan to help mitigate traffic congestion in and around Logan Airport as well as ensure the success of Massport's expectation to reduce deadhead trips by as much as a third and the potential to eliminate more

² A non-shared pick-up fee will remain the same at \$3.25.

³ Effective October 1, 2019.

**Metropolitan Area Planning Council (MAPC) comments on
Logan Airport Parking Project, DEIR, MEPA # 15665**

than three million annual trips to and from Logan Airport. Advancing the efficient management of TNC trips, promoting TNCs to carry passengers both when entering and exiting Logan Airport, and increasing shared-trips may even reduce the need for additional onsite parking. That is why MAPC is requesting that the actual performance of the system be monitored after the first phase of parking expansion in 2021, to determine if the assumptions underlying the plan for a second phase continue to be valid.

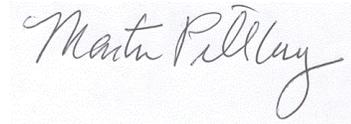
Electrification Commitments

MAPC applauds Massport for addressing the following transportation electrification commitments and including them in the draft Section 61 Findings. These commitments will contribute to reductions in GHG emissions and help the state meet its goals:

- Reserve priority parking spaces for alternative fuel vehicles (e.g., electric vehicles) amounting to at least one percent of total spaces and assigning preferred parking spaces for other low-emitting and fuel-efficient vehicles amounting to at least another one percent of total spaces.
- Install electric vehicle charging stations to accommodate 150 percent of demand; 15 charging stations are currently planned for the new garage in front of Terminal E and five are planned for the Economy Garage expansion.
- Provide high-speed electric vehicle charging stations at all taxi, livery, and TNC pools at Logan Airport so that 150 percent of demand for charging stations is available at all pools at all times at no cost to the user.
- Provide taxi and TNC queue priority to electric vehicles (second only to vehicles with at least three passengers).

Thank you for the opportunity to comment.

Sincerely,



Martin Pillsbury
Environmental Planning Director

cc: Lisa Wieland, CEO
Martin Suuberg, Commissioner, MassDEP
David Mohler, MassDOT