



SMART GROWTH AND REGIONAL COLLABORATION

January 23, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Anne Canaday, MEPA #15665
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Logan Airport Parking Project, FEIR/EA - 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 transit, bicycling, 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 Final Environmental Impact Report (FEIR)/Environmental Assessment (EA) for the Logan Airport Parking Project (the Project). This FEIR 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 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.

It is important to note that MAPC does not support this Project. We believe adding more parking spaces to Logan Airport will encourage more Single Occupancy Vehicle (SOV) trips to/from Logan, and depress the willingness of customers to use other means such as High Occupancy Vehicles (HOV) that generate lower emissions and reduce congestion on the roads leading to/from the airport. Massport deserves credit for implementing a series of steps designed to improve congestion while at the same time reducing emissions, such as expanded Logan Express service and new rules regarding drop-offs/pick-ups by Transportation Network Companies (TNCs) such as Uber and Lyft. We remain concerned that the addition of new parking spaces will work against the impact of these positive steps.

All that having been said, we are at the FEIR stage of this review, and Department of Environmental Protection (DEP) approval for the construction of these parking spaces has already been granted. So, MAPC will confine our comments in the remainder of this letter to the issues directly at hand in this filing.

MAPC has reviewed the FEIR/EA and is pleased that Massport has agreed to reevaluate the need for the additional 3,000 parking spaces planned as part of the Economy Garage expansion prior to the start of its construction, anticipated in mid-2023. We respectfully ask the Secretary to incorporate into her Certificate an ancillary requirement that this mid-course review include the following two steps:

- 1) Release by Massport of a document with an updated analysis of the need for the Economy Garage expansion, based on more recent data, at least six months prior to the anticipated start of construction on this portion of the project.
- 2) This analysis should be available for public comment prior to any final go/no go decision on completing this portion of the project.

In this way, Massport will engage in a deliberate “pause” to reflect on the impact of the new Terminal E parking, changes in demand for fixed parking spaces, and use of other mechanisms for travel to/from Logan Airport, such as TNCs, Logan Express, and the MBTA, prior to making a final judgment on the construction of the additional 3,000 parking spaces.

We note that the Proponent has finalized the three required ground access studies¹ and integrated the data and findings into the FEIR/EA. These studies constitute a mitigation commitment to DEP as part of the amendment to the Parking Freeze.

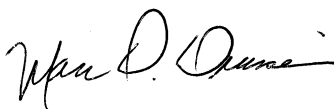
MAPC respectfully requests that the Section 61 Findings include a clear commitment to pursue parking pricing policies which can influence travel behaviors in ways that advance HOV use and reduce SOV use. Decisions regarding parking pricing policies must be made by holistically looking at fees for all modes of access to/from Logan Airport (e.g., Logan Express, TNCs).

Such a holistic analysis, looking at parking pricing along with other modes of access, can promote alternative transit options as well as support Massport’s long-range efforts to address VMT and air quality impacts of ground access to/from Logan Airport.

In order to minimize adverse impacts of the expanded parking and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary incorporate these two recommendations as part of the Certificate on the Final EIR.

Thank you for the opportunity to comment.

Sincerely,



Marc D. Draisen
Executive Director

cc: Beth Card, MassDEP
David Mohler, MassDOT
Hayes Morrison, Massport

¹ The three ground access studies are: 1) Logan Airport Ground Access HOV Services, 2) Logan Airport Ground Access HOV Pricing, and 3) Logan Airport Ground Access and Reducing Non-HOV Operations.