

LETTER OF COMMENT

Via email to:

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RE: Terminal E EA/DEIR Comments

To the FAA, MEPA and Massport,

This is a comment letter jointly from the Town of Arlington and the Town of Belmont responding to the request for public comment on the Environmental Assessment (EA)/Draft Environmental Impact Report (DEIR) about the proposal to expand and modernize Terminal E at Logan Airport.

We agree that there are many ground-based environmental benefits and that Boston and the region gains substantial economic benefits from having world-class facilities and a choice of options for flights to/from international destinations. It is also true that the current Terminal E facility and configuration are sub-optimal for both airlines and travelers and need updating. We appreciate the efforts made to look at the various configuration options and have no comment on the physical aspects of the one being recommended.

Our comments focus on the environmental impacts from the resulting changes in aviation operations that will be enabled by the Terminal E expansion. We believe there will be more flights and those flights will be during times of day – late evening and overnight – that currently have lower volumes. Any appreciable change in flights does have direct environmental and quality-of-life effect on the communities and people who live in the proximity of Logan Airport. While the whole region benefits - these communities bear the brunt of the environmental impact from the aviation operations coming to and leaving BOS. We ask that these impacts are included in the scope of consideration when evaluating the environmental impact of this proposal.

1. The response to our 12-9-15 comment letter on page A-253, X.2 and X.4 of the EA/DEIR states: “.....Logan Airport will handle the same level of increased international passenger activity whether or not Terminal E is modernized”. We take exception to this assumption. The expansion of Terminal E will add 7 new gates to a capacity-constrained terminal. Having a modern international terminal with more capacity will make Logan airport a more desirable destination for carriers and will invite competition. Though the future is hard to predict – we don’t believe that “the same number of passengers and aircraft would be accommodated under the No-Action Alternative and Proposed Action....” is a reasonable assumption. We believe that an expanded and modernized Terminal E can’t help but stimulate an increase in international passengers and aircraft that would exceed the activity if no action were taken.
2. The response to our 12-9-15 comment letter on page A-254, X.6 of the EA/DEIR states: “Since most of Logan Airport’s international service is to Europe and the Caribbean, these markets are expected to operate during the current daily peak period of 6:00 PM and 10:00 PM.” Based on everything that we have seen and been told – Logan Airport’s afternoon/evening peak has been historically from 4:00 PM to 7:00 PM. The increase in international arrivals and departures has started to “fill-in” the available capacity in the 7:00 PM – 12:00 AM time period. One can easily go to the website (<http://www.flightstats.com/>) and see that as Massport has been successful in attracting new international carriers and routes - there are now an increasing number of international arrivals from 6:00 PM and 8:00 PM with departures from 9:00 PM to 12:00 AM. These planes tend to be larger and loaded with freight so they are heavier. Some are newer aircraft and some are older depending on airline. **These flights are now extending the traditional peak period past 7:00 PM and we would expect this time period to be used even more when Terminal E has increased gate capacity.** This is a time when more people are at home and/or trying to sleep.

As Logan Airport expands its international facilities – this expansion has the very real potential to change the airport’s operations regarding the type of aircraft and the times of day and volume when it is used. We ask that this potential change in aircraft mix and flight volume be evaluated and fully considered as well as what operational noise mitigation efforts should be undertaken as a result of these potential changes. This consideration should be part of the EA/DEIR process before these changes are approved.

The communities of Arlington and Belmont and our residents have been recently negatively impacted by changes made by the FAA to flight paths. We strongly believe that it is in the best interest of the FAA, MEPA and Massport to thoughtfully and intentionally consider not just the benefits of the Terminal E project but also the potential negative impacts that any changes at Logan may have on communities and residents under the flights that takeoff and land at the airport. Ongoing efforts to look at runway use and to critically evaluate the negative impacts of RNAV procedures that have and will concentrate flights over certain communities and neighborhoods should be supported and properly funded.

We appreciate the opportunity to provide additional comments as part of this process.

Sincerely,

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