

LETTER OF COMMENT

Via email to: Page.Czepiga@state.ma.us

December 9, 2015

Mr. Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: Page Czepiga, EEA No. 15434
100 Cambridge Street Suite 900
Boston, MA 02114

Dear Secretary Beaton,

This is a comment letter about the proposal to expand Terminal E at Logan Airport. After reading the Environmental Notification Form (ENF), I have concerns about the completeness of the consideration for the environmental impacts this expansion of international flight capacity will have on the region.

Environmental Impact of Increased International Flight Volume Insufficiently Considered

The Logan Airport 2011 Environmental Status and Planning Report (ESPR - http://bit.ly/Logan_ESPR_2011) projects an increase in flight operations at Logan Airport of 29% from 2011-2030. The ENF states that the number of projected international passengers at Logan will increase from 4.9 million in 2014 to 6 million in 2022 – a 22% increase. One can reasonably assume based on the proposal to expand the International Terminal at Logan that a substantial amount of the ESPR's projected increase is going to come from international operations. This is important because Logan is capacity-constrained during the peak hours of 6am-9am and 4pm-7pm. The current international flights are primarily arriving between 6pm-9pm and departing between 9pm-12am. There is also a scheduled flight to Hong Kong at 1:30am.

It is reasonable to assume:

1. Since there is no more runway capacity during the peak hours
2. The majority of current international flights arrive and depart between 6pm and 12am
3. There is additional capacity during that time period – there are currently only seven departures between 9pm-10pm, three between 10pm-11pm and two between 11pm-12am.

The communities in the vicinity of Logan can expect that there will be a significantly higher frequency of flights in the evening/night/overnight time period. Most people are at home in the evening and trying to sleep at night so the potential for increased disruption of quality of life and sleep is significant and is not appropriately considered in the content of the Environmental Notification Form (ENF). The scheduling of arrivals and departures in the overnight time period from 12am-6am should not be allowed under any future scenario.

There is a reference on page 10 of the ENF to environmental analysis that was included in the 2011 ESPR but this is in no way an adequate consideration of the potential impact such a substantial potential increase in flight operations in the evening/night time frame and overnight time periods. The DNL metric used by the FAA in their analysis of changes in flight operations is antiquated and was developed for a radar-based mode of air traffic control. The impact of these increases in flight volume is exacerbated by the continued implementation by the FAA of RNAV satellite-based flight path routing under their Performance-based Navigation (PBN) initiatives under the umbrella of their NextGen modernization program. These new international flights will be large, heavy (full of freight) and in some cases old, aircraft. They tend to gain altitude more slowly and have a much louder noise profile than smaller jets. Massport has already approved modifications to international gates and runways that will allow Logan to accommodate the largest passenger aircraft such as the Airbus 380 and Boeing 747-8 (<http://bit.ly/1Qwd1vP>).

The residents in close-in communities as well as those under concentrated flight paths further away from the airport who are already experiencing significant negative effects from current operations will be subjected to what will be a significant impact – regardless of what is reflected in the FAA’s captive analysis.

I request that the State of Massachusetts require Massport and the FAA to provide detailed analysis of how the expansion of Terminal E will enable increased flight operations at Logan – especially in the evening/night hours - and what the real-world impact of that increase will be on residents and communities represented on the Logan Community Advisory Committee (CAC). This real-world impact should include the analysis of all flight paths that could be used to accommodate this increase in flights and supplemental metrics such as N65, Lmax and SEL in addition to DNL. I also ask that you consider mandating that Massport establish an overnight curfew to prevent an increase in flights in the 12am-6am time period that could be required to accommodate the increased capacity enabled by this proposed expansion.

Failure to Consider Alternatives

Community residents have promoted regional air travel planning for over 30 years. Now, despite the chronic health effects caused by Logan Airport pollution and significant negative noise impacts of NextGen/PBN/RNAV concentration of flight paths, Massport's solution for Massachusetts' international air travel needs seems solely focused on expansion at Logan. We have regional airports such as Worcester that are under-utilized. MEPA should require the Port Authority to thoroughly investigate a feasible range of alternatives in order to properly assess the environmentally beneficial impacts of this proposal.

Health / Pollution

Logan Airport pollution has been proven to cause increased risk of probable childhood asthma and increased risk of COPD. Transportation sources are also known to cause greater risk of cardiovascular and lung cancer deaths, greater risk of childhood autism, and a significant increase in risk of heart attack. Jet pollution fallout has been proven to follow predictable patterns under flight paths, exposing thousands upon thousands of Boston region residents, even miles away from runway ends to pollution 6 – 8 times urban average levels, and thus exposing them to all of the heightened risks and adverse health outcomes.

Current Massport plans call for significant expansion of passenger volume that will have a corresponding increase in NO_x. With the expanded Terminal E expected to contribute 57% to the growth in passenger volume, the project will cause a 14% increase in NO_x by itself, a fact that must be weighed by MEPA in considering the environmental impacts of this project.

Transportation Impacts

Massport has done an insufficient job of addressing the transportation impacts of the Terminal E Modernization. The project ENF does not provide credible evidence that the proposed expanded Terminal will not produce additional induced demand for vehicle trips and parking. Greater investments should be required to enhance alternative and more environmentally friendly modes of transportation to and from Logan.

It is my hope that you will carefully consider these concerns and act in the interests of the people and neighborhoods impacted by airport operations across the region.

Sincerely,

Myron Kassaraba

Town of Belmont Representative to the Logan CAC and Massport CAC

<http://www.belmont-ma.gov/logan-airport-community-advisory-committee>

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