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September 17, 2020

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
SINGLE ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Logan Express Framingham – Garage Expansion
PROJECT MUNICIPALITY	: Framingham
PROJECT WATERSHED	: SuAsCo
EEA NUMBER	: 16168
PROJECT PROPONENT	: Massachusetts Port Authority
DATE NOTICED IN MONITOR	: August 10, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Environmental Impact Report (Single EIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

Project Description

The project involves increasing the capacity of the Massachusetts Port Authority (Massport)'s existing Logan Express Parking Garage in Framingham. Logan Express is a transit service offered by Massport which transports passengers by bus to Logan Airport from each of its five satellite locations in Peabody, Woburn, Framingham, Braintree and Boston (Back Bay). At each of the four suburban facilities, including Framingham, users are able to park their vehicles for a fee and take the Logan Express bus directly to Logan Airport's four passenger terminals. Some users of the Logan Express bus service are also dropped off/picked up at the facility and do not use the parking facilities. The Logan Express bus service currently carries approximately 2 million passengers annually and is a component of Massport's overall trip reduction and high occupancy vehicle (HOV) strategy. This project will contribute to Massport's goal of increasing HOV mode share to Logan Airport by 40 percent by 2027 as part of MassPort's commitment to reduce roadway congestion and associated greenhouse gas (GHG) emissions.

The existing four-level garage at the Framingham Logan Express facility has a capacity of 1,082 spaces on site, in addition to approximately 697 overflow spaces at nearby commercial properties (total of 1,779 spaces). The project proposes to construct an additional three levels of parking (998 New parking spaces) on the existing four-level garage for a total of 2,080 spaces on-site, while continuing to lease 565 of the currently available 697 overflow parking spaces off-site (total of 2,645 spaces). The project is proposed to meet existing and future demand of air passenger and employees seeking access to Logan Airport. Since the Framingham garage opened in 2015, annual ridership has exceeded projected demand and has increased by 147,000 trips per year (34.1 percent) between 2015-2018.

As described in Massport's recent Environmental Status and Planning Report (ESPR) (EEA#3247) for Logan Airport, Massport has a comprehensive vehicle trip reduction strategy to diversify and enhance ground transportation options for passengers and employees traveling to and from Logan Airport. To improve accessibility to the Airport as well as to relieve on-Airport roadway congestion and increase HOV use, Massport proposes to enhance Logan Express facilities, implement on-Airport roadway and Massachusetts Bay Transportation Authority (MBTA) Blue Line/intra-terminal connectivity projects, construct a consolidated transportation network company (TNC, such as Uber and Lyft) drop-off and pick-up area, and construct new parking facilities to help reduce the number of drop-off/pick-up trips. Massport's plan expects to double Logan Express annual ridership from 2 million to 4 million which will be advanced through this project.

Project Changes Since the EENF

As described in the Single EIR, the proposed project remains consistent with the project description contained in the March 2020 EENF. However, the COVID-19 pandemic has had a substantial impact on Massport operations including a dramatic reduction in the number of daily flights and an approximately 90% reduction in passenger levels in Spring 2020. Within this context, Massport continues to evaluate and plan for the recovery of air passenger activity and remains committed to implementing the broad range of ground access and trip reduction strategies including expansion of Logan Express services. The schedule for those improvements, however, has been adjusted due to the continuing passenger reductions. At the time of the EENF filing, Massport's plan was to commence construction on the Framingham Logan Express Garage Expansion in 2020. However, at this time, it is anticipated that the proposed garage expansion will be delayed for at least 12 months.

MEPA Review History

An ENF (EEA#12412) was filed in 2001 proposing to construct a 1,081-space parking garage at the project site. A Certificate was issued on February 23, 2001 determining that no further MEPA review was required. However, the project was not constructed and a second ENF (EEA#15144) was filed in 2014 due to lapse of time. The project consisted of the construction of a bus terminal and five-story parking garage with 1,500 parking spaces which would replace an existing surface parking lot (374 spaces) at the facility and consolidate off-site overflow parking (500 spaces) used when Massport's lot was full. The Certificate indicated that if sufficient funding was not available for a five-level garage, a four-level garage accommodating 1,100

parking spaces would be constructed. As described in the Certificate, at the time of project design and permitting, a future vertical expansion was contemplated; therefore, the garage was designed to structurally support up to seven levels of parking. The purpose of the project was to add parking capacity and consolidate remote overflow lot operations into a single new garage facility. Upon discontinuation of the 500 off-site overflow spaces leased by Massport, the project would have resulted in an additional 626 net New spaces to accommodate projected future demand (1,500 total spaces).

A Certificate on the second ENF (EEA# 15144) was issued on February 28, 2014 which determined that no further MEPA review was required. Massport subsequently constructed a four-level parking garage accommodating 1,082 parking spaces with the plan to phase out use of overflow spaces leased off-site. However, once the parking garage was opened in 2015, it was almost immediately filled to capacity due to the convenience of the service and growth in passenger levels at Logan Airport. Therefore, Massport has continued to lease the off-site overflow lots since the opening of the garage and, consequently, the 500 off-site spaces were not taken out of service and up to an additional 197 off-site spaces were periodically used during high demand periods. Because use of the off-site overflow spaces was not contemplated at the time MEPA review previously concluded, approximately 565 off-site spaces which will continue to be utilized, are considered New for purposes of this filing, in addition to the 998 New spaces to be offered through vertical expansion of the parking garage (1,563 total New spaces). An Expanded ENF was submitted in March 2020 and a Certificate was issued on April 17, 2020 which included a Scope for a Single EIR.

Project Site

The 4.63-acre project site consists of the existing Logan Express Facility which includes the four-level, 382,700 sf parking garage with 1,082 parking spaces, bus terminal, ticket office, waiting area, vending area and restrooms. Approximately 3.14 acres of the project site is impervious, the remainder of the site consists of lawn and landscaping around the building perimeter, storm drainage infrastructure, and forested upland and wetlands.

Massport currently leases an additional 697 parking spaces from adjacent property owners including 490 spaces at the AMC Theatres parking lot, 75 spaces at Fran's Florist and up to 132 additional parking spaces at the Shopper's World parking lot. Use of the 132 spaces at the Shopper's World is expected to end upon the opening of the garage expansion, leaving a total of 565 overflow spaces available off-site.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include the generation of 1,496 new adt (4,800 adt total); construction of 998 new parking spaces (2,645 total); increase in water demand by 440 gallons per day (gpd) (890 gpd total); and increase in wastewater generation by 400 gpd (805 gpd total). As described below, the project is anticipated to have environmental benefits overall due to the reduction in vehicle miles traveled to and from Logan Airport and a net reduction of associated GHG emissions of 7,061 tons per year (tpy) (net of the marginal increase in emissions associated with increased traffic in the project vicinity).

The ENF identifies the following measures to avoid, minimize, and mitigate project impacts: avoiding construction period impacts to wetlands, use of sediment and erosion controls during construction and implementation of energy efficiency measures within the parking garage including the provision of a building facade solar array.

Jurisdiction and Permitting

The project is undergoing MEPA review and is subject to a mandatory EIR pursuant to 301 CMR 11.03(6)(a)(7) of the MEPA regulations because it involves Agency Action and involves the construction of 1,000 or more New parking spaces at a single location. The project also exceeds the ENF threshold at 11.03(6)(b)(14) because it will generate 1,000 or more new adt and create 150 or more New parking spaces at a single location. The project is being undertaken by Massport. The project is subject to the MEPA Greenhouse Gas Policy and Protocol (GHG Policy).

The project requires an Order of Conditions from the Framingham Conservation Commission due to temporary impacts proposed to the 100-ft buffer zone to Bordering Vegetated Wetlands (BVW) during the construction period. In the case of an appeal, the project may require a Superseding Order of Conditions from the Massachusetts Department of Environmental Protection (MassDEP).

Because the project is being undertaken by a State Agency, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

Review of the Single EIR

The Single EIR provided a revised TIA and GHG analysis, a response to comments and draft Section 61 findings and was generally responsive to the Scope. Comments from the Department of Energy Resources do not identify any outstanding GHG analysis. Comments from Air Inc. are supportive of the project and encourage Massport to further increase HOV ridership through expanded capacity and/or service improvements at Logan Express facilities, including the Framingham facility, based on how quickly the facility is expected to reach capacity.

Alternatives Analysis

In response to the Secretary's Certificate on the EENF, the Single EIR evaluated the possibility of relocating the existing overflow parking along Flutie Pass which is currently 1,300 sf away from the main parking facility, to a location closer to the garage facility. As described in the Single EIR, parking industry standards generally suggest that the walkable limit is approximately 1,000 feet. Although there are sidewalks between the overflow lot and the main terminal facility, the Logan Express bus serves the overflow lot bus stop as frequently as the main facility, making walking between the main facility and overflow lot unnecessary. As described in the Single EIR, shifting the overflow parking lot to a location closer to the garage is not feasible because Massport recently extended the lease for the 490-space AMC lot along Flutie Pass through 2030, with an option for an additional 10-year extension. As part of this plan,

Massport also entered into an agreement to upgrade the adjacent 75-space parking at the former "Fran's Flowers" garden facility. Therefore, Massport dismissed an alternative that would provide overflow parking at areas closer to the existing facility.

The Scope in the EENF requested that the Single EIR explore ways that Massport could bridge connections to local bus routes and public transportation including the provision of space for regional bus service at the Framingham Logan Express Facility. As described in the Single EIR, Massport's priority for Logan Express is to provide parking capacity for Logan-bound passengers and therefore use of that limited capacity is not provided for other bus services that do not provide feeder service for Logan Airport passengers or employees. However, Massport has recently contacted the MetroWest Regional Transit Authority (MWRTA) regarding coordinating the potential relocation of the existing MWRTA bus stop along Route 1 or adding an additional bus stop at the Logan Express Framingham terminal building if it would serve MWRTA customers and be compatible with Logan Express Framingham operations. The feasibility of aligning the timing and frequency of the MWRTA's and Logan Express' respective bus schedules would also be considered. While several of the MWRTA services are temporarily reduced or suspended due to the ongoing COVID-19 pandemic, Massport and the MWRTA have agreed to coordinate on a more regular basis as activity levels and the use of public transportation services recover.

The Single EIR indicated that bus rapid transit (BRT) and/or bus priority facilities along I-90 would be under the jurisdiction of MassDOT. However, if they become available between the Framingham Logan Express facility and Logan Airport, Massport would work to make use of those facilities to further grow HOV ridership. The Single EIR indicates that Massport and MassDOT work together on transportation improvements often and will continue to do so.

Transportation

The Single EIR included an updated TIA which described the current operation of the overflow lots and clarified that trips to the overflow lots were incorporated into the traffic analyses. Users of the overflow lots currently must park in short term parking at the main terminal building, purchase their Logan Express bus ticket in the building and then drive to the overflow lot. Users then must wait for a Logan Express bus, which originates from the main Framingham Logan Express terminal building, to pick them up and depart towards Logan Airport. For outbound traffic, the Logan Express bus that originates at Logan Airport will make a stop at overflow parking lots to drop off users before arriving at its final destination at the main Framingham Logan Express terminal building. Implementation of e-ticketing and placement of ticket kiosks at overflow lots is expected to reduce trips to and from the main facility for users.

Massport has a comprehensive, multi-pronged trip reduction strategy to diversify and enhance ground transportation options for passengers and employees traveling to and from Logan Airport. Massport's plan includes doubling Logan Express annual ridership from 2 million to 4 million which will be supported through this project. The Logan Express Framingham Garage Expansion is expected to reduce trips on Logan gateway roads by 1,100,000 annually based on modeling that was done at a 50 million passenger demand level over a 10-yr planning horizon. The Single EIR outlines Massport's ground Transportation Improvement Strategy which is intended to achieve this goal, including:

- Increase Braintree and Framingham Logan Express service from two to three trips per hour (temporarily deferred due to COVID19).
- Advance planning for added parking capacity at the Logan Express Braintree site that is nearing capacity.
- Execute a sustained marketing campaign to support the Logan Express strategy and increase ridership.
- Implement Logan Express electronic ticketing.
- Open a new urban Logan Express site in Boston at North Station (initially planned for mid-2020, but now temporarily deferred).
- Evaluate new Logan Express suburban locations, with a plan to open at least one new site (temporarily deferred).
- Explore Ride Apps (Uber/Lyft, etc.) to provide 'last mile' connections to/from Logan Express facilities.
- Continue to monitor ridership and parking capacity at all Logan Express sites.

The Single EIR described how projected demand for the use of the Framingham facility was calculated. Massport first calculated the amount of parking needed to handle 2019 demand levels. To calculate future demand, Massport used its mode choice model driven by responses to the 2019 Logan Ground Access Survey to determine the capacity needs for the Logan Express system, including Framingham. This model has the ability to run different scenarios to calculate probable demand on services and consider the latent demand for services. This is especially important for the calculation Framingham demand given the capacity issues at the facility. The analytics behind the model are driven by responses to the 2019 Logan Ground Access Survey. As described in the Single EIR and supplemental correspondence with Massport[1], reported 2019 ridership was approximately 570,000 annual riders at the Framingham Logan Express. Modeling estimates indicate that the addition of more parking capacity combined with additional passenger volume would result in an increase in ridership at Framingham of up to 10% over and above the passenger growth. This would result in a ridership of approximately 850,000 at a 50M passenger level. This modeling was done in 2019. Since then, the COVID-19 pandemic has had a substantial impact on Massport operations. However, Massport anticipates that passenger volumes levels will recover in the upcoming years and that projections related to future passenger volumes remain valid.

As described in the Single EIR, Massport will continue to closely monitor the recovery of passenger volumes at Framingham as well as all Massport Logan Express locations. Currently, services at Framingham, Braintree and Woburn are operating for the same number of hours per day, but buses are generally running on a reduced hourly schedule throughout the day. The Peabody and Back Bay Logan Express operations are currently suspended. As of the date of the Single EIR preparation, passenger levels at Framingham were averaging less than 10% of the available seat capacity of 2,100 seats per day. Based on available information, Massport expects to maintain this reduced service schedule through 2020 but will adjust scheduling at a later date through continued monitoring.

[1] Massport sent the MEPA Office clarifying e-mails on 9/16/2020 and 9/17/2020.

Massport continuously monitors the use of all on and off-airport Logan Express garages and parking facilities to be able to adjust use on a real-time basis. Daily counts from each facility are reviewed by Massport's parking operations team. Bus ridership is also tracked and where needed, additional Logan Express bus runs can be added to meet shifting demand from both Logan passengers and employees. Massport's annual Environmental Data Report (EDR) and Environmental Status and Planning Report (ESPR) documents report Logan Express ridership, parking demand and use and provide periodic updates on how Logan Express ridership fits into current HOV goals. EDRs typically present current data while ESPRs add an element of forward thinking for forecasts. The 2018/2019 Logan EDR will provide an update on Logan Express services when filed in late 2020. Massport will continue to monitor passenger demand and intends to add service if air passenger demand increases.

In the event future monitoring shows substantial differences in projected passenger and ridership demand, it appears possible that Massport may choose to suspend plans to expand the Framingham parking facility or engage in further planning to implement a different strategy relative to parking demand and passenger transportation to and from Logan Airport. To the extent such potential future planning may result in material changes to this project or a new construction plan altogether, Massport should consult with the MEPA Office to determine the need for review of such alternative strategies. Massport should consult with the MEPA Office if no construction activity occurs within the next 3 to 5 years to determine the applicability of the lapse of time provisions under the MEPA regulations.

The garage currently has two bicycle racks inside the garage with a combined capacity to store 16 bicycles. Massport will continue to monitor use of the bicycle racks to determine the demand for any additional bicycle storage capacity.

Climate Change

Governor Baker's Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth (EO 569; the Order) was issued on September 16, 2016. The Order recognizes the serious threat presented by climate change and direct Executive Branch agencies to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts. The Order seeks to ensure that Massachusetts will meet GHG emissions reduction limits established under the Global Warming Solution Act of 2008 (GWSA) and will work to prepare state government and cities and towns for the impacts of climate change. I note that the MEPA statute directs all State Agencies to consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise, when issuing permits, licenses and other administrative approvals and decisions. M.G.L. c. 30, § 61.

GHG Emissions

As described above, the project consists of constructing three levels of parking on top of an existing parking garage which will be unconditioned (the garage parking levels are neither heated nor cooled). Therefore, the stationary source analysis is limited to energy generation and emissions related to lighting. The lighting design and lighting power reduction remain unchanged from the EENF. The Project proposes highly efficient LED lighting that will

incorporate motion sensors and ambient light sensors. Under Base Case, lighting would generate 130.7 tpy while the Proposed Case will reduce emissions by 97.5 tpy to 33.1 tpy representing an approximately 75 percent reduction in emissions. Comments from DOER do not identify any outstanding GHG analyses.

Renewable Energy

The Project includes the addition of solar PV on the façade of the Logan Express facility (placement of solar panels along the face of the parking garage as opposed to the rooftop). A solar canopy was considered which would offset a greater amount of GHG emissions. However, in discussions with the City of Framingham, it was determined that the construction of a solar canopy above the top level of the parking garage would classify the building as a "high-rise" structure which would trigger fire protection requirements that would significantly increase project costs by requiring fire suppression throughout the entire garage building, including retrofitting existing garage levels. It was estimated that the cost of the fire suppression system would likely cost 4.3 million dollars making the solar canopy alternative financially infeasible. The proposed façade solar PV system has an estimated production of 159 MWh/year and will offset an estimated 54 tons of GHG annually.

Mobile Source Emissions

While the new trip generation and local traffic GHG emissions are expected to increase by approximately 199 tons annually due to the proposed Project's three new levels of parking, the Project's reduction in GHG emissions due to the reduced trips to Logan airport is estimated to be 7,260 tons annually. As a result of overall vehicle trip reduction, the proposed project anticipates reducing net CO2 emissions by 7,061 tons per year.

Currently, there are four EV parking spaces. The project includes the installation of two additional EV parking spaces for a total of six EV parking spaces. Additional conduit and infrastructure will be also placed for two additional EV-ready spaces.

Adaptation and Resiliency

As noted above, the project consists of the addition of three parking levels on an existing parking garage. As described in the Single EIR, Massport will design and construct the facility in accordance with their Sustainability and Resiliency Design Guidelines (SRDG). The project is proposing several resilient design measures including the incorporation of a solar photovoltaic power panels on garage façade; high efficiency LED lighting; and two new EV parking spaces for a total of six charging stations. The project already incorporates bike rack and water saving restroom fixtures. Roof runoff from the new facility will continue to be directed to the existing stormwater system on the site, while the runoff from the interior levels of the garage will be directed to the sewer system. Stormwater pollutants will be minimized as the roof parking will be only be used during peak operation, and snow-melting machines will be utilized in place of de-icing chemicals. The facility is not identified as being located in a current FEMA floodplain, or otherwise subject to flooding risk based on future climate conditions.

Construction Period

As described in the Single EIR, prior to construction Massport will work with the selected construction contractor to develop a Construction Management Plan (CMP) that identifies specific measures to be implemented during construction. The CMP will provide details on methods to be employed to manage potential construction period impacts including traffic management, materials management, parking, air quality, wetland, and noise impacts.

All construction and demolition activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle construction and demolition (C&D) debris to the maximum extent.

Mitigation and Draft Section 61 Findings

The Single EIR included draft Section 61 Findings for the project. It described mitigation measures and contained commitments to implement such measures. The draft Section 61 Findings will serve as the template for conditions in any Permits required for the project and should be revised, as necessary, in response to this Certificate. The following measures have been proposed in accordance with M.G.L. c. 30, § 61, to avoid, minimize, and mitigate environmental impacts:

Traffic and Transportation

The purpose of the project is to reduce or shorten vehicle trips by passengers and employees of Logan Airport. The project itself serves as a Transportation Demand Management (TDM) measure allowing employees and customers of Logan Airport to utilize a HOV vehicle (i.e. the bus) to access Logan Airport from Framingham. The project is expected to eliminate 1,100,000 annual vehicle trips on the Logan Airport gateway entrances/exits including the Sumner and Callahan Tunnels and the Williams Tunnel (I-90). Additional measures that will be implemented at the Logan Express Framingham Facility include:

- Increased bus frequency from two to three times hourly (to be initiated upon resumption of suitable passenger demand post COVID-19 recovery).
- Initiate E-ticketing for improved customer convenience and to speed up boarding.

- Ticketing kiosks at overflow parking lot to reduce trips to and from the main facility and overflow lots.

GHG Emissions

- Installation of a167-kW of façade-mounted solar PV system.
- A 75 percent reduction in lighting power consumption through reduced lighting power density (0.047 W/sf) and use of motion and ambient light sensors to dim lights when no occupancy is detected for 10 minutes and turn off when daylight is sufficient. This equates to approximately 97.5 tpy of GHG emissions reductions.
- Construction of two new EV parking spaces with charging infrastructure and two EV ready parking spaces
- The project is expected to result in a net reduction of mobile source GHG emissions by 7,061 tpy.

Construction Period

Prior to construction, Massport will work with the selected construction contractor to develop a CMP that identifies specific measures to be implemented during construction to ensure the following:

- Safe and uninterrupted movement of vehicles, pedestrians, and bicyclists.
- Dedicated storage and staging areas for construction materials.
- Preferred construction vehicle access routes to the Project site.
- Measures to control potential construction-related air quality and noise impact.
- Measures to control potential negative impact to wetlands, water quality, and stormwater management (compliance also through adherence with the Order of Conditions issued for the Project by the Framingham Conservation Commission).
- Notification and construction protocols to be implemented if contamination is encountered at the site during construction.
- Measures to ensure safe and continuous access to portions of the garage to remain open for LEX parking.

Conclusion

Based on a review of the Single EIR, comments letters, and consultation with State Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. Outstanding issues can be addressed during State and local permitting. No further MEPA review is required and the project may proceed to permitting. Massport shall file final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

K. Theoharides

September 17, 2020
Date

Kathleen A. Theoharides

Comments received:

09/09/2020 Department of Energy Resources (DOER)
09/15/2020 Air INC.

KAT/EFF/eff

September 14, 2020

The Honorable Kathleen A. Theoharides,
Secretary Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900,
Boston, Massachusetts 02114

Re: AIR, Inc. Comment: Logan Express Framingham Garage Expansion Single Environmental Impact Report SEIR (EEA # 16168)

Dear Secretary Theoharides,

Airport Impact Relief, Incorporated (AIR, Inc.) and our partners at Mother's Out Front, East Boston thank you for the opportunity to comment on the Massport Logan Express Framingham Garage Expansion SEIR.

The first Logan Express Framingham (LEXF) Garage expansion, which brought that facility's capacity to 1,082 spaces, was successful and filled to capacity upon completion. Massport now predicts the proposed second vertical parking garage expansion of 998 spaces will also be filled to capacity upon completion (given a return to pre-pandemic passenger levels). The success of expansions totaling 2,080 spaces at LEXF speaks to the strength of the paid remote long term airport parking market. But what if such facilities were expanded to reach 5,000 or even 10,000 spaces? Could they be filled? Under what pricing and other market conditions would such facilities be successful?

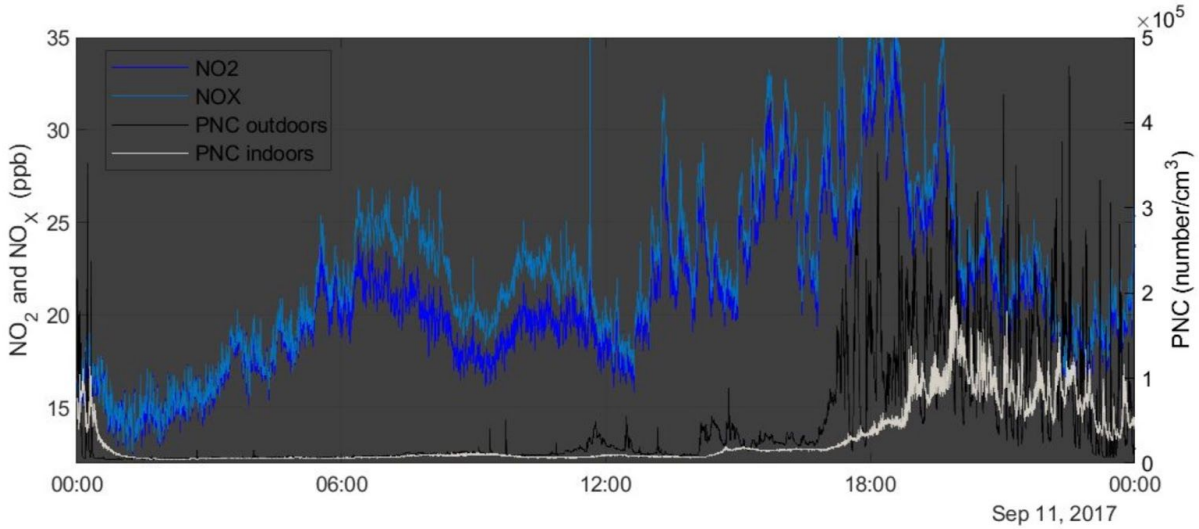

Figure S14: A 24-hour time-series of particle number concentration (PNC) and oxides-of-nitrogen.

The backdrop for this question, however, is not only related to the economic viability of such facilities. A Tufts University study released in July of 2020 found concentrations of gaseous and particulate pollutants in an indoor residential measurement site near Logan 1.1- to 4.8-fold higher than when the residence was not downwind of the airport. This shows that the accumulated pollution at Logan has a massive impact on surrounding towns. Other research has shown sharply elevated ultrafine pollutants as far as 10 miles away from major airports.

Heavy airport ground access-related vehicular traffic pollution has both hyper-local negative impacts, as seen in sharply elevated near roadway particulate emissions measurements, as well as tributary impacts as a component of larger cumulative airport emissions plumes seen in the Tufts research. The Tufts study summarized that near-airport indoor residential particulate pollution counts can even reach levels comparable to ambient concentrations measured locally on roadways and highways shoulders. Ambient NO2 concentrations at the residential measurement site exceeded those measured at regulatory monitoring sites in the area including near-road monitors.

If cumulative airport emissions are turning beautiful residential neighborhoods such as the one in Point Shirley, Winthrop at which the Tufts measurements were taken, into dangerously polluted environments -equivalent to the shoulder of I-93, the backdrop for remote parking expansions becomes a matter of far greater importance. With the World Health Organization announcing in 2014 that 1 in 8 total deaths were attributable to poor air quality, air pollution is the largest single cause of death globally.

A Regional Problem

Airport noise and air pollution even 10 miles outside of major airports are a matter of concern across the nation, the subject of extensive research, and an emerging regulatory challenge. Rising in proportion to increases in passenger and flight volumes and geographical proximity,

negative health outcomes are unseen costs of the success and economic benefit of commercial aviation facilities. Although vehicular sources of air pollution at Logan are less than 6% of the airport's total modeled emissions (the vast majority being emitted by aircraft engines both in and off the tarmac), it is AIR, Inc.'s position that the hyper-local impacts on residential populations in East Boston, Logan's host community, create acute negative health impacts which should be aggressively abated through both source reduction and mitigation strategies.

Not only does single occupancy vehicle SOV ground access congestion contribute to unacceptable threats to human health in surrounding residential communities, but with a relatively high threshold of airfield capacity, airport traffic congestion actually oses the most serious threat to growth at Logan International Airport. HOV mode growth therefore is an important component of a shift in mobility planning needed to protect the health of residents of the Commonwealth, and to sustain the growth and improvement of air travel into and out of the metropolitan Boston region.

Much like the state of Massachusetts has been able to bend the curve of this global pandemic, we believe Massport- through leadership, investment and innovation can significantly lower adverse airport impacts. While AIR, Inc. enthusiastically supports Massport's efforts to increase HOV mode share of ground access transportation to Logan via increasing availability of parking at Logan Express locations such as the Logan Express Framingham site (LEXF) via the garage expansion proposed in this SEIR, we hope that MEPA will continue to push the Port Authority to expand its measurement, management and mitigation efforts manyfold.

At 2019 peak volumes, passenger car ground access traffic modes, which comprised over 60% of trips to Logan airport under the recent redefinition of HOV including taxi and TNC trips with over one passenger, had already caused congestion far exceeding the capacity of the surrounding area roadway network on a daily basis. But due to the constraints of Logan's physical location, ground access capacity cannot easily be added. This causes delays in passenger arrivals, adds cost, stress and frustration to the Logan travel experience, and could easily begin to increase operational delays at Logan, if allowed to compound.

While the global pandemic adds additional uncertainty about the pace of record and growth of air travel beyond the historic high levels attained in 2019, under any passenger level growth scenarios, Logan's ground access congestion must be addressed. In Secretary Theoharides' project DEIR certificate's History of MEPA Review, EEA points out that the previous Logan Express structured parking expansion was almost immediately filled to capacity upon opening in 2015. Likewise, Massport's projections show that this vertical expansion is also likely to be quickly filled. Indeed, while the combination of Massport's ground access strategies within the LEXF SEIR represents an important movement, the cumulative additional HOV capacity earned by these efforts will not bend the trajectory of increasing SOV ground access volumes into Logan. With this in mind, MEPA should direct Massport to establish HOV travel mode goals and corresponding policies which target more aggressive HOV goals.

massport

Boston-Logan International Airport

Monthly Airport Traffic Summary - July 2020

(Year starting on January)

	July 2020	July 2019	Percent Change	Difference Change	Year-to-Date 2020	Year-to-Date 2019	Percent Change	Difference Change
Flights								
Domestic								
Domestic Charter Flights	2	21	-90.5%	-19	93	246	-62.2%	-153
Domestic Commuter Flights	3,738	7,677	-51.3%	-3,939	31,055	43,873	-29.2%	-12,818
Domestic Jet Flights	10,072	22,831	-55.9%	-12,759	83,354	150,607	-44.7%	-67,253
Total Domestic Flights	13,812	30,529	-54.8%	-16,717	114,502	194,726	-41.2%	-80,224
International								
Bermuda/Bahamas/Caribbean	613	792	-22.6%	-179	3,666	6,093	-39.8%	-2,427
Canada	124	1,576	-92.1%	-1,452	3,367	9,981	-66.3%	-6,614
Central America	7	185	-96.2%	-178	589	1,775	-66.8%	-1,186
Europe	353	2,157	-83.6%	-1,804	4,006	10,885	-63.2%	-6,879
Middle East	28	213	-86.9%	-185	582	1,376	-57.7%	-794
South America	0	44	-100.0%	-44	120	440	-72.7%	-320
Trans-Pacific	27	267	-89.9%	-240	552	1,614	-65.8%	-1,062
Australia	0	0	0.0%	0	0	0	0.0%	0
North Africa	0	26	-100.0%	-26	50	34	47.1%	16
Other International	0	0	0.0%	0	0	0	0.0%	0
Total International Flights	1,152	5,260	-78.1%	-4,108	12,932	32,198	-59.8%	-19,266
General Aviation	1,176	2,838	-58.6%	-1,662	7,778	16,828	-53.8%	-9,050
Total Arriving (InBound) Flights	8,077	19,371	-58.3%	-11,294	67,619	121,910	-44.5%	-54,291
Total Departing (OutBound) Flights	8,063	19,256	-58.1%	-11,193	67,593	121,842	-44.5%	-54,249
Total Airport Flight Operations	**16,140**	**38,627**	**-58.2%**	**-22,487**	**135,212**	**243,752**	**-44.5%**	**-108,540**
Passenger								
Domestic								
Domestic Charter Passenger	55	614	-91.0%	-559	2,580	8,049	-67.9%	-5,469
Domestic Commuter Passenger	29,373	229,977	-87.2%	-200,604	602,262	1,429,815	-57.9%	-827,553
Domestic Jet Passenger	632,212	2,939,949	-78.5%	-2,307,737	6,862,711	18,094,618	-62.1%	-11,231,907
Total Domestic Passengers	661,640	3,170,540	-79.1%	-2,508,900	7,467,553	19,532,482	-61.8%	-12,064,929
International								
Bermuda/Bahamas/Caribbean	47,708	113,288	-57.9%	-65,580	405,384	815,452	-50.3%	-410,068
Canada	2,646	102,348	-97.4%	-99,702	135,925	562,270	-75.8%	-426,345
Central America	365	25,720	-98.6%	-25,355	76,254	232,309	-67.2%	-156,055
Europe	19,373	502,765	-96.1%	-483,392	557,606	2,405,032	-76.8%	-1,847,426
Middle East	2,259	73,091	-96.9%	-70,832	152,445	400,672	-62.0%	-248,227
South America	0	7,919	-100.0%	-7,919	22,358	64,474	-65.3%	-42,116
Trans-Pacific	0	60,752	-100.0%	-60,752	88,169	347,323	-74.6%	-259,154
Australia	0	0	0.0%	0	0	0	0.0%	0
North Africa	0	5,759	-100.0%	-5,759	6,514	7,433	-12.4%	-919
Other International	0	0	0.0%	0	0	0	0.0%	0
Total International Passengers	72,351	891,642	-91.9%	-819,291	1,444,655	4,834,965	-70.1%	-3,390,310
General Aviation	4,144	9,900	-58.1%	-5,756	28,472	61,782	-53.9%	-33,310
Total Deplaning (InBound) Passengers	373,375	2,058,876	-81.9%	-1,685,501	4,553,548	12,316,098	-63.0%	-7,762,550
Total Enplaning (OutBound) Passengers	364,760	2,013,206	-81.9%	-1,648,446	4,387,132	12,113,131	-63.8%	-7,725,999
Total Airport Passengers	**738,135**	**4,072,082**	**-81.9%**	**-3,333,947**	**8,940,680**	**24,429,229**	**-63.4%**	**-15,488,549**
Cargo & Mail in Lbs.								
Mail								
Domestic	1,891,329	2,051,270	-7.8%	-159,941	12,141,833	15,875,027	-23.5%	-3,733,194
International	0	38,486	-100.0%	-38,486	59,166	156,848	-62.3%	-97,682
Total Airport Mail	1,891,329	2,089,756	-9.5%	-198,427	12,200,999	16,031,875	-23.9%	-3,830,876
Express/Small								
Domestic	36,196,315	33,393,700	8.4%	2,802,615	236,433,915	225,924,423	4.7%	10,509,492
International	1,179	723	63.1%	456	10,027	9,592	4.5%	435
Total Airport Express/Small	36,197,494	33,394,423	8.4%	2,803,071	236,443,942	225,934,015	4.7%	10,509,927
Freight								
Domestic	2,211,651	3,359,440	-34.2%	-1,147,789	15,925,419	20,345,867	-21.7%	-4,420,448
International	7,360,268	21,928,981	-66.4%	-14,568,713	75,996,725	150,995,543	-49.7%	-74,998,818
Total Airport Freight	9,571,919	25,288,421	-62.1%	-15,716,502	91,922,144	171,341,410	-46.4%	-79,419,266
Combined Express/Freight Volume	**45,769,413**	**58,682,844**	**-22.0%**	-12,913,431	**328,366,086**	**397,275,425**	**-17.3%**	-68,909,339

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Flight and passenger activity at Logan, initially down 78% and 97% due to the pandemic, have already rebounded 26% and 15% respectively in the 4 months since April 2020 -reaching 58%

and 82% of historic peak volumes. If this recovery rate is maintained, flight and passenger activity will reach Logan's historic peak levels by December 2121, and November 2022.

The COVID Effect

Regarding adjusted future growth projections in the upcoming EDR 2018/2019, if Logan Express' 98% pandemic decline reported in the SEIR has been experienced across the spectrum of HOV airport ground access services, Logan's pre-COVID 19 40% - 60% HOV to SOV ratio could backslide considerably. In this event a return to historic peak passenger levels by November 2022 would mean that pre-COVID airport traffic congestion levels experienced at Logan's 2019 peak 43 million passengers could return at volumes as low as 25 - 30 million passengers, as early as October 2121. Without action, the 50 million passenger level could equate to a near doubling of Logan's peak traffic levels.

We hope that Massport will include some analyses of the effect of the COVID 19 HOV decline in its responses to the VMT analyses requested in MEPA 9.

Massport can use its mixed logit analytics to identify improvements to its bus service such as installation of plug-in HEPA filtration machines on Logan Express vehicles and MBTA cars, incentives such as free or reduced cost parking at Logan Express lots, and monetary as well as non-monetary congestion pricing strategies (non-monetary being time-restricted SOV ground access), and other policies which could be used to address public safety concerns over social distancing and safety.

An Expanded Airport Access Bus Network

With this in mind, AIR, Inc. encourages Massport to expand its efforts to colocate regional bus service at Logan Express facilities, effectively extending the public transit network serving Logan. Massport's use of a mixed logit analysis to predict demand for parking under a variety of varying conditions should be useful in identifying pricing strategies which would encourage use of this extended bus network. We are encouraged that Massport has made a commitment to working more closely with the Metrowest Regional Transportation Authority as bud ridership resumes. We hope that EEA will create a timetable and structure for these discussions which allows for AIR, Inc. and our Traffic Impact Committee to participate.

AIR, Inc. appreciates Massport's past efforts to coordinate with private bus service providers (Peter Pan). However, the pre-COVID 19 Logan Airport traffic congestion levels attained in 2019, along with the prospect of further growth warrant that Masport take a more active role in expanding its airport express bus transit program as soon as possible- and even in advance of the return of overcapacity traffic volumes. We also appreciate Massport's commitment to meeting with MWRTA regarding collocation of the Route 1 Framingham bus station and respectfully suggest that Massport should also more aggressively expand upon this, as well as the feasibility of implementing BRT with Framingham Logan Express operations requested in MEPA 5.

Develop an Expanded Long Term Remote Airport HOV Facility Strategy

In addition to investment in an expanded regional bus network, AIR, Inc. strongly encourages Massport to move to secure ownership or long-term control of commercial land directly adjacent to LEXF and its other Logan Express locations, wherever possible. This should be done to allow for the further expansion of remote structured parking facilities. We estimate that appropriate management- the goal of which would be to create significant reduction of the concentration of airport ground access-related emissions which are harmful to human health in line-or-sight Logan host communities -of present day (pre-COVID) peak airport average weekday daily traffic and parking demand volumes would require an enormous increase of 50% in HOV mode share (from today's 40% level, to around 60%).

Increased Collaboration

We suggest that Massport can also invite MBTA and the Institute for Transportation and Development Policy ITDP, who have collaborated on recent successful partial BRT experiments, into this discussion. AIR, Inc. has met with ITDP and other transportation partners to discuss possible collaborations, and we are confident that there is strong interest in supporting the Port Authority in any way possible.

Conclusion

AIR, Inc. supports Massport's plans to expand its remote parking facilities at LEXF. But we also continue to maintain that this facility must look beyond the next 998 parking spaces and into a future where we can meet the needs of many thousands more Logan-bound air travelers with state of the art bus service.

Where Logan is an important economic engine for the region, Massport should invest in planning airport ground access systems which are capable of offering more convenient, less expensive, more enjoyable, and faster home to airport experiences reaching out in all directions around Logan. If plans for BRT or bus priority lanes along I-90 between the Framingham Logan Express facility and Logan Airport are not forthcoming, then we believe Massport should initiate them.

While we understand that Massport is acting to create and additional 2 million annual Logan Express seats over the next few years, soon to be realized new peak passenger volumes combined with potential sharp pandemic-related declines across the airport HOV ground access spectrum stand to wipe out any possible gains years before the additional capacity is even created. Much more nimble and flexible planning is needed to meet Logan's rapidly changing ground access challenges.

We are glad that Massport is considering adding baggage check-through at one or more of the suburban Logan Express locations. The convenience and peace of mind which will be added to

the experience of travelers using Logan Express could be important in repositioning this service relative to SOV modes.

We are also glad to learn that Massport will consider providing additional monetary incentives for users of public transportation. Financial cost should be considered a primary driver of transportation decisions within lower income economic circles. Reducing costs for users of the broader bus transit network should improve the value positioning of Logan Express particularly in relation to kiss and drop alternatives.

E-Ticketing will be a major convenience enhancement for users of Logan Express. Removal of potential hassle and delay provided by electronic ticketing will reduce travel stress.

AIR, Inc. supports Massport's efforts to continuously upgrade and improve its Logan Express system with upgraded facilities, modern buses, Wi-Fi, improved/expanded parking and adjusted bus fares and parking rates. We believe the goal of doubling annual ridership is an important first step toward a much larger solution.

We are thankful to EEA for their commitment to working with Massport and impacted communities, through the MEPA process toward establishment of broader goals and implementation of changes that will push Logan's HOV levels higher. AIR, Inc. has developed an Impact Committee organizational strategy through which we can offer our assistance and partnership to Massport in order to provide airport mitigation community expertise, technical air quality measurement and research insights, and other feedback, and support in Massport's efforts to fulfill EEA's 2017 ESPR directives around increased non-profit and community engagement, additional mitigation strategies for noise, traffic, and emissions, and discussion of potential air filtration strategies with the East Boston Neighborhood Health Clinic.

We have requested to meet with Massport staff regarding this scoping work in early May, to provide our partnership as they develop their scope for the combined EDR 2018/2019. And while we understand that the global pandemic has had massive and devastating impacts on the team at Massport, and stand ready to begin these collaborations as soon as the Port Authority is reasonably able, we hope that EEA will continue to encourage Massport to work collaboratively into the future with groups such as ours as we strive for achievement of the noise, emissions and traffic reductions so badly needed in and around East Boston and across the region.

Sincerely,

Chris Marchi
Vice President
Airport Impact Relief, Incorporated (AIR, Inc.)

Sonja Tengblad
Coordinator, Mothers Out Front East Boston

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9 September 2020

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: Logan Express Garage, Framingham, Massachusetts, EEA #16168

Cc: Maggie McCarey, Director of Energy Efficiency, Department of Energy Resources
Patrick Woodcock, Commissioner, Department of Energy Resources

Dear Secretary Theoharides:

We've reviewed the Single Environmental Impact Report (SEIR) for the above project. The proposed project includes adding several stories of new structured parking over an existing, approximately 100,000-sf footprint parking garage.

Mitigation Commitments

Mitigation commitments are as follows:

- 167-kW of façade-mounted solar PV, anticipated to produce about 163 to 190 MWhrs/yr
- A 75% reduction in lighting power consumption.
- The existing garage has a total of 4 spaces with EV charging. The expansion will increase this by 2 for a total of 6 spaces with EV charging. In addition, 2 spaces will be made EV ready.

DOER EENF Recommendations

In our EENF comments, we recommended that the proponent provide more information about rooftop solar and EV charging. The SEIR addresses these recommendations.

- The SEIR provides additional explanation concerning feasibility of rooftop PV. Specifically, the proponent has examined rooftop PV potential and found that adding a rooftop canopy would cause the building to exceed the height at which an automatic sprinkler system would be required to be retrofitted throughout the whole building. This requirement is contained in MGL Chapter 148, Section 26A. The proponent also received an estimate of $4.3M as the estimated cost of the fire suppression system. Based on this, addition of a PV canopy was deemed infeasible. In lieu of a horizontal rooftop canopy, the proponent has committed to a 167-kW of façade-mounted solar PV system.

- The SEIR provides additional detail on EV charging. The current structure has 4 EV spaces. The expansion project will add 2 more spaces and will add 2 spaces that will be EV ready.

Sincerely,

Paul F. Ormond, P.E.
Energy Efficiency Engineer
Massachusetts Department of Energy Resources

Brendan Place
Clean Energy Engineer
Massachusetts Department of Energy Resources