



For a thriving New England

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May 8, 2017

VIA EMAIL ([DEP.Talks@state.ma.us](mailto:DEP.Talks@state.ma.us))

Glenn Keith, Deputy Director for Air Quality Programs  
MassDEP  
One Winter Street  
Boston, MA 02108

RE: Proposed Amendments to 310 CMR 7.30, *Logan Airport Parking Freeze*

Dear Mr. Keith:

On behalf of the Conservation Law Foundation (CLF), I am writing in support of the Massachusetts Port Authority's (Massport) request to amend the Massachusetts Department of Environmental Protection (MassDEP) Massport/Logan Airport Parking Freeze regulations at 310 CMR 7.30. The Logan Airport Parking Freeze is a legal requirement of the current Massachusetts Clean Air Act (CAA) State Implementation Plan (SIP).

CLF is a nonprofit, member-supported, regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities for all in New England. CLF has a long-history of advocating for a more efficient, affordable, accessible, and sustainable transportation system and has supported and actively promoted the creation of parking freezes as part of a strategy to improve air quality in the region.

As you are aware from our oral testimony at MassDEP's public hearing on April 25, 2017, CLF originally did not support the proposed amendment to the Parking Freeze regulations. At the time, among other concerns, we expressed alarm about the lack of implementation of high-occupancy vehicle (HOV) projects and the misplaced focus on merely studying such efforts. We are now writing in support, because Massport, at CLF's request, has recently agreed to add substantial transportation mitigation measures and HOV-targets to its proposal. These measures and targets have been memorialized in a binding agreement with CLF and Massport will incorporate some of them in its Section 61 Findings as part of the Massachusetts Environmental Policy Act (MEPA) process for the parking garages.

### **Purpose of Massport-CLF Agreement**

Massport and CLF share the goal of reducing the overall environmental, emissions, and traffic impacts of travel to and from Logan Airport and encouraging an increase in the number and percentage of airport passengers who get to and from the airport by HOV-modes. To this

end, Massport and CLF have an agreement in principle, pending board approval, advancing these mutual objectives. Pursuant to the Massport-CLF Agreement, the proposed increase in parking supply at Logan Airport would not occur in isolation, but rather as one component of a multi-pronged comprehensive program to reduce the overall environmental, emissions, and traffic impact of ground transportation and ground-service equipment at the airport. This program has the explicit goal of encouraging an increasing number of passengers to travel to and from the airport by an HOV mode with a specific percentage increase required by a certain date and to increase electrification of the airport. CLF wholeheartedly supports this program.

Since 2002, Massport has invested close to \$160 million in HOV capital improvements. Massport currently spends \$33 million annually on HOV operations. These HOV investments have included the expansion of Logan Express sites (from two to five locations) and service, as well as financial support of Massachusetts Bay Transportation Authority (MBTA) Silver Line access to the airport, consisting of the purchase of eight buses for and free trips on the line from the airport terminals. Massport, as a result of its agreement with CLF, has now committed to build on these achievements and to implement substantial further capital and operational investments in HOV.

### **Specific Mitigation Measures and Targets included in Massport-CLF Agreement**

As part of its agreement with CLF, Massport will increase the share of air passengers using HOV modes to access Logan Airport to at least a 35.5 percent mode share by December 31, 2022 (the current HOV mode share is 30.5 percent). Massport will further increase the HOV mode share to 40 percent no later than December 31, 2027. The HOV mode share may only include taxi, livery, and Transportation Network Company (TNC) trips that have an average of at least 2.0 passengers per vehicle per trip.

In addition, as part of its agreement with CLF, Massport has agreed to the following specific improvements, projects, measures, incentives, and studies:

#### HOV Improvements:

- Purchase and support the operation of 16 Silver Line buses, replacing eight buses and adding another eight.
- Offer the approximately 18,000 employees based at Logan Airport free Blue Line service from the MBTA Airport Station by January of 2019.
- Increase Logan Express capacity, measured in available seats, by 10 percent by the end of 2019.

### Electrification Infrastructure:

- Increase the availability of electric vehicle charging stations so that 150% of demand for such infrastructure is available at all parking facilities at all times. In other words, no more than 66.667% of electric vehicle charging stations are to be in use at any one time.
- Provide high-speed electric vehicle charging stations at all taxi, livery, and TNC pools at Logan Airport by July 2019, so that 150% of demand for such infrastructure is available at all pools at all times. This demand will be measured as no more than 66.667% of electric vehicle charging stations to be in use at any time. All such electric vehicle charging stations will be provided at no cost to the user.
- Replace all ground service equipment, where commercially available electric alternatives are available by the end of 2027. By the beginning of construction of the parking garages at least 9% of the ground service equipment will be electric. By the completion of construction of the first parking garage at least 12% of the ground service equipment will be electric. And, by the time construction of the second parking structure is complete at least 24% of the ground service equipment will be electric.
- For those categories of equipment for which no electric or other zero emission alternative is commercially available by the end of 2027, replace such equipment within two (2) years of it becoming commercially available, provided that the equipment to be replaced is at least eight years old.
- Implement procedures so that at least 60 percent of commercial aircraft taxiing for a re-positioning purpose be done by electric tugs by 2027.

### HOV and Electrification Incentives:

- Establish a ride-share trip fee on a per-trip rather than per-person basis starting no later than January 1, 2019.
- Train ground transportation personnel to encourage passengers to share rides no later than January 1, 2019.
- Provide taxi/TNC-queue priority to electric vehicles, second only to vehicles with at least three passengers starting in January of 2019.
- Implement variable-rate parking within one year of opening of the new structured parking, if Massport's study (see below) demonstrates a sufficient positive mode-shift impact.

Studies:

- Study the effectiveness of variable-rate pricing at the airport prior to the opening of the parking garages.
- Study the effectiveness of an airport pass-through rate prior to the opening of the parking garages.
- These analyses would be included in the studies referenced in the proposed amendment to the Logan Parking Freeze regulations and the SIP.

Massport has agreed to seek to include many of these improvements, projects, measures, incentives, and studies in its Section 61 Findings as part of the MEPA process for the new parking garages in addition to the Massport-CLF agreement.

**HOV measure and projects benefit passengers, surrounding communities, and the planet**

While additional parking alone would at first appear customer-friendly to Logan travelers, the reality is that more parking yields more one- and two-passenger trips to the airport, increases congestion and reduces levels of service on already stressed tunnels, major arteries, and feeder roads, decreases customer confidence in timely arrival, and forces travelers to sacrifice more valuable time from work to avoid missed flights. This familiar pattern forces the somewhat counter-intuitive recognition that increased parking volume actually diminishes the travel experience for Logan passengers, rather than satisfying consumer needs. This same dynamic leads to significant impacts on the communities surrounding the airport, as more vehicle congestion compromises local air quality, local mobility, and the accessibility of small businesses to both customers and deliveries. The increased greenhouse gas emissions associated with such congestion are a further compelling concern and of great significance to the Commonwealth's goal to reduce greenhouse gas emissions from the transportation sector as part of the state's efforts to comply with the Global Warming Solutions Act.

At the same time, an analysis by Massport indicates that the constrained parking supply could cause 75% of passengers who would otherwise choose to park at Logan to instead use a private pick up/drop off mode. Curbside pickup and drop off generally generates up to four trips as compared to two for parking, thereby increasing vehicle miles traveled (VMT), emissions, and traffic. As a result, it would be neither sufficient to increase the availability of parking at the airport alone, nor to limit it without additional efforts to incentivize the use of HOV modes by passengers and others commuting to and from the airport.

CLF appreciates that Massport CEO Tom Glynn and the Port Authority's current leadership have recognized that parking expansion alone is not a sustainable solution for the long term.



The program agreed to between Massport and CLF will implement a number of initiatives to build on the Port Authority's prior HOV efforts and make transit options more appealing to passengers and airport employees. Combined these efforts will substantially increase the HOV mode share of ground transportation at the airport, while also electrifying ground-service equipment of the airport and encouraging an increase in zero emission vehicles traveling to and from the airport.

### **Conclusion**

There is no doubt that Massport is facing a major challenge in managing ground transportation to the airport as passenger volumes increase. An increase in the parking cap by 5,000 spaces alone would only have provided Logan Airport relief for a short period, generating a litany of adverse impacts. Therefore, Massport has now committed to implement smarter, more sustainable solutions to its ground-access challenges along with the increase in parking capacity. CLF supports this comprehensive approach and therefore the Port Authority's request to amend the Logan Parking Freeze Regulations.

CLF stands ready to answer any questions, supply any additional information, or assist the MassDEP and Massport in this matter. If you have any questions, I can be reached by phone at (617) 850-1739 or by email at [rmares@clf.org](mailto:rmares@clf.org).

Sincerely,

A handwritten signature in blue ink that reads "D. Paul Mares".

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Vice President and Program Director  
Healthy Communities and Environmental Justice