

*Mailed to Jerry*  
*Silva*  
**Letter 1**

**Jerry**

**From:** Jerry [lawfsg@verizon.net]  
**Sent:** Monday, August 07, 2006 3:40 PM  
**To:** 'treilly@town.winthrop.ma.us'  
**Cc:** 'pboncore@town.winthrop.ma.us'; 'jferrino@town.winthrop.ma.us'; 'jletterie@town.winthrop.ma.us'; 'jmaggio@town.winthrop.ma.us'; 'ndelvento@town.winthrop.ma.us'; 'rgill@town.winthrop.ma.us'; 'rsanford@town.winthrop.ma.us'; 'lcalla@town.winthrop.ma.us'; 'Sandra Kunz'; 'rdormitzer@comcast.net'; 'Zlody, Maura'  
**Subject:** Comments

**Comments by the Town of Winthrop Noise, Air Pollution  
 And Airport Hazards Committee to the Federal Aviation  
 Administration Draft Revaluations of the Environmental  
 Impact Statement, Centerfield Taxiway**

The above referred to draft of the reevaluation violates the F.A.A.'s Record of Decision, Massachusetts Secretary of Environmental Affairs EOECA Certificate dated June 5, 2001 and the Suffolk Superior Court Judgment of November 18, 2003. The study was conducted by the F.A.A. and its consultant, with little input from the Community Representatives. Such input was so limited that the study developed into a one sided F.A.A. Study. All sixteen proposed suggestions of the Community Representatives for environmental mitigation of noise and air pollution were rejected by the F.A.A. without a detailed investigation as mandated in the ROD and the Massachusetts Secretary of Environmental Affairs Certificate. The F.A.A. denied Community Representatives, all laymen with little technical backgrounds, funding to hire their own independent consultants. These Community Representatives were also refused the benefits of knowing the methodologies and data used by the F.A.A.'s consultants to arrive at the study's conclusions. In a particularly bizarre decision, the F.A. A. refused to admit members of the public with years of experience dealing with local community-Airport related issues to attend the three meetings F.A.A. held with Community Representatives. With the F.A.A. in complete control of the project, the work proceeded without establishing a formal Scope of Study, particularly on environmental issues. The F.A.A. completely controlled the project's format, presentation and discussion. The study focused primarily on the benefits to Operations and the concerns of the Logan Airport Control Tower with virtually no consideration of the benefits of environmental mitigation. Community Representatives have also raised serious questions about the quality of minutes taken and amended to the May, 2006 Additional Taxiway Evaluation Report as required by the ROD of Aug. 2, 2002. Insubstantial minutes of such important meetings deny Community Representatives, those residents they represent and their legal advisors access to the full content of both sides of the study work effort. Among technical decisions made in the context of this Taxiway Evaluation, the F.A.A. refused to reinstate an order from a previous date, which allows only five Turbo- Jets on the November Taxiway at the same time. While this "good neighbor" order would provide some relief from noise and air pollution, it was unacceptable because of certain inconvenience to the Airlines Pilots and the Tower. In addition, there was no study nor discussion as to monitoring actual air pollution presently contributed by aircraft operating on the November Taxiway. The F.A.A. consultants and staff flatly stated in the May, 2006 Additional Taxiway Evaluation Report that imposing the Limit All Jets standard for the November Taxiway would make no difference even if measurably less toxic pollutants were generated than if the Free Flow standard were used because the November Taxiway is only a small part of Logan Airport's total operational land

8/7/2006

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area; limiting pollutant emissions from that small area would make little or no difference to the airport's overall air quality, which falls within Federal environmental legal limits.

In his Certificate of June 5, 2001, Secretary Durand ordered that the Massachusetts Port Authority develop a program designed to maximize the use of single engine Taxiway procedure. Massport has ignored that mandate despite the stated position of the F.A.A. in the ROD that state policies, regulations and directives shall be honored.

We have been advised that throughout the study the F.A.A. claimed it lacked the prerequisite controls and authority over Massport, particularly in the area of environmental concerns as mandated by the ROD. Further, Massport argued it had no control/power over the Airlines. Both positions are "handy" - technically true statements. However, behind the technicalities the F.A.A. and Massport avoid the real issues.

The F.A.A. has the power to force Massport to adopt reasonable environmental mitigation as mandated by three different sources: the ROD, the Massachusetts Environmental Affairs Secretary Certificate, and the orders issued by the Suffolk Superior Court, by withholding funds from Massport. It is well known that any state agency dependent upon federal funds must adhere to federal law and policy by adhering to appropriate policies and regulations. Massport has the power and the authority to adopt reasonable ground rules and regulations.

The re-evaluation reflects that the F.A.A. in conjunction with Massport, used the original EIS as a baseline for the reevaluation of the Centerfield Taxiway (CFTW). The study was not a fresh, objective effort aimed at developing meaningful environmental mitigation for noise and air pollution at the CFTW. F.A.A.'s conclusions were drawn before the current study began. Additionally, it was brought to our attention that the F.A.A. used a software program, known as Sound Plan, in the reevaluation of the proposed Taxiway. It is our understanding that whenever the F.A.A. conducts an environmental evaluation/assessment it must receive approval from its office of Environment and Energy. Based on information given to the Community Representatives by an F.A.A. representative, we came to believe that such approval was not given. While we have little evidence to confirm this believe, if accurate, such a fact would render the study improperly conducted. We may need to investigate the process used in the original EIS.

In conclusion, the reevaluation report of the Centerfield Taxiway is flawed in its baseline and its conclusion. A new study must be undertaken, a study that will accurately seek a balance between environmental issues and the concerns of Operations and such the Tower studies should carefully distinguish between efficiency costs, and safety verses environmental benefits. Unless the study of this nature is completed, the Centerfield Taxiway should not be constructed.

Respectfully submitted,

Jerome E. Falbo,

Vice Chairman, Town of Winthrop Noise, Air Pollution & Airport Hazards Committee

cc: Rick White, Winthrop Town Manager

Bob Driscoll, Chairman,AHC

Joe Ferrino, Winthrop Town Councilor at Large

State Rep. Robert DeLeo

AHC Members



COMMONWEALTH OF MASSACHUSETTS  
MASSACHUSETTS SENATE

STATE HOUSE, BOSTON 02133-1053

**Letter 2**

SENATOR MICHAEL W. MORRISSEY

NORFOLK AND PLYMOUTH DISTRICT

ROOM 413D

TEL. (617) 722-1494

FAX. (617) 722-1055

E-Mail: Michael.W.Morrissey@state.ma.us

COMMITTEES:

TELECOMMUNICATIONS, UTILITIES & ENERGY

(CHAIR)

CONSUMER PROTECTION & PROFESSIONAL LICENSURE

(CHAIR)

WAYS AND MEANS

TOURISM, ARTS & CULTURAL DEVELOPMENT

ELECTION LAWS

August 10, 2006

Mr. John Silva  
Federal Aviation Administration  
New England Region  
12 New England Executive Park  
Burlington, MA 01803

Dear Mr. Silva,

I am writing to express my opposition to the Centerfield Taxiway that has been proposed at Logan Airport. The creation of a Centerfield Taxiway, as proposed, would increase air traffic over Quincy, Braintree and other South Shore communities and affect many of my constituents.

I thank you in advance for your consideration of this matter. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael W. Morrissey", with a long, sweeping underline that extends to the right.

Michael W. Morrissey  
Senator, Norfolk and Plymouth Districts

MWM/pab

AUG 14 2006



August 10, 2006

Ms. Amy Corbett  
Regional Administrator  
Federal Aviation Administration  
New England Region  
12 New England Executive Park  
Burlington, MA 01803

RE: Centerfield Taxiway ROD-Logan Airport

Dear Ms. Corbett:

We strongly object to the August 21, 2006 comment deadline included in your recent notice concerning the draft written reevaluation-ROD on the proposed centerfield taxiway for Logan Airport. The centerfield taxiway is a complicated proposal that would cause serious adverse environmental impacts in East Boston, Winthrop and Revere that currently suffer from unacceptable levels of noise and pollution from Logan Airport.

We are strongly opposed to the centerfield taxiway for two basic reasons:

1. It would bring long lines of taxiing aircraft much closer to densely populated residential neighborhoods. Not only would this increase taxiing noise levels but it would significantly increase the exposure of these neighborhoods to increased levels of toxic pollutants emanating from the inefficient idling jet engines. These increased levels of toxic pollutants would include Volatile Organic Compounds (VOC), Oxides of Nitrogen (NOx), and Carbon Monoxide (CO).
2. The centerfield taxiway would increase the capacity of the airport, thereby allowing additional operations on Runway 22L, which are currently constrained by the absence of the centerfield taxiway. Runway 22L operations are particularly noisy, with takeoffs severely impacting East Boston and Winthrop and landings impacting Revere.

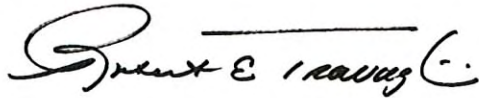
Increased Runway 22L operations would generate not only more severe noise levels but also the identical air pollution impacts – VOC, NOx, and CO – associated with the centerfield taxiway.

The Federal Aviation Administration has completely failed to provide any widespread public notification of the status of this huge project. The failure of the FAA to post adequate notices in our local multi-lingual newspapers is the basis of the general lack of awareness in the East Boston, Winthrop and Revere communities.

I urge you to not only extend the comment period for the centerfield taxiway/ROD by at least 120 days to allow the public adequate time to evaluate and respond to this complicated proposal but also to schedule public hearings in East Boston, Winthrop and Revere. Extending the comment period will provide the residents of these environmentally impacted communities an opportunity to be informed firsthand of the consequences of the centerfield taxiway.

If you should have any questions please do not hesitate to contact us.

Sincerely,



**ROBERT E. TRAVAGLINI**  
President of the Senate



**ANTHONY PETRUCCELLI**  
State Representative

cc: Senator Edward M. Kennedy  
Senator John F. Kerry  
Congressman Michael Capuano  
Boston City Councilor Salvatore LaMattina



# Letter 4

CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR  
THOMAS M. MENINO

August 11, 2006

Amy Corbett, Regional Administrator  
Federal Aviation Administration  
12 New England Executive Park  
Burlington, Massachusetts 01803

Dear Ms. Corbett:

As you know, in August 2002, the Federal Aviation Administration approved the Environmental Impact Statement (EIS) for the Logan International Airport Airside Improvements Planning Project. Included in the Record of Decision (ROD) for the project was a deferral on the Centerfield Taxiway (CFT). The deferment stated:

**FAA is also deferring any decision concerning the Centerfield Taxiway until FAA conducts an additional evaluation of potential beneficial operational procedures that would preserve or improve the operational and environmental benefits of the Centerfield Taxiway shown in the Final EIS.**

It is my hope the FAA will recommend alternatives to the Centerfield Taxiway in order to accommodate Logan Airport's ground capacity concerns.

It has been my contention from the beginning of the airside improvement process, that Massport should closely examine a regional approach to the distribution of flights destined for the Boston market. Although flights have increased at both Manchester and Providence, growth at Logan has once again begun to increase and has reached pre 9/11 levels. Obviously, the number of flights will continue to increase at Logan, and the challenge that Massport must confront is how to devise ways to accommodate future growth without the addition of runways and/or taxiways.

The Centerfield Taxiway will result in more aircraft movements on the airport surface than currently occur. This can only result in additional noise and air quality impacts for both East Boston and Winthrop residents. During peak periods of operation at Logan, local residents must endure tremendous noise and air quality impacts if they want to enjoy using their back yards, or to just take a stroll along the new harborwalk along Bayswater Street. Many residents have stopped spending a day at the newly redeveloped Constitution Beach due to excessive noise and fumes spewed out by jet aircraft departing Logan, one can only imagine what the impacts will be if the Centerfield Taxiway is built. Although we cannot close Logan, these highly impacted residents deserve more respect than this.

The FAA must work with Massport in designing innovative programs that can accommodate growth without increasing negative impacts to those residents that suffer most from aircraft operations at Logan. Programs to address aircraft ground movements such as an innovative gate management plan that would coordinate aircraft ground movements with both incoming and outgoing flights to lessen the demand on

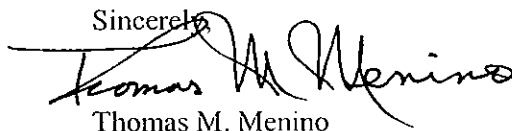
gate space. Also, Massport should work with the airlines to establish a share-a-gate program that would allow a pilot to dock his or her aircraft at any available gate regardless of the terminal. This would dramatically reduce the level of aircraft congestion during peak periods or inclement weather when gate space becomes scarce.

Programs such as those listed above or any other kind of program to reduce the level of aircraft ground movements at Logan should be closely studied before Massport constructs any more runways or taxiways. Obviously, both Massport and the FAA have a serious problem with the amount of asphalt required to accommodate aircraft ground movements, otherwise they would remove November Taxiway when and if the Centerfield Taxiway is built. However, the FAA has made it clear this will not occur. The combination of the two taxiways in simultaneous operation will place both East Boston and Winthrop residents at great environmental peril.

The other major issue that concerns me is that of public safety. I simply cannot understand why, with all the problems the FAA has had with ground incursions at Logan, they would want to create more airfield intersections that will dramatically increase the potential for more ground incursions. In my opinion, this not only adds to controller workload, it also places the traveling public at greater risk.

I also would like to comment on the public process. As you know, as part of the Record of Decision for the Logan Airside Improvement Program, the FAA Administrator directed the local FAA regional office to perform a separate study for the Centerfield Taxiway. This process was to produce an additional Record of Decision directed solely for the Centerfield Taxiway. The Town of Winthrop and the City of Boston were asked to appoint three members to discuss community concerns about this controversial project. While I support the spirit of the Administrator's directive, I have serious concerns as to whether or not the idea was successful in accomplishing its goal. For example, only three meetings were held for Phase One and two meetings were held to complete Phase Two of the process. Also, the meetings were closed to the public, even Massport was not allowed to attend. I believe the public would have been better served if the meetings were a part of an open process that would have provided valuable information based on additional public input.

Therefore, I am taking this opportunity to request at least a 90-day extension of the comment period, which is currently scheduled to conclude on August 21. In addition, I urge you to conduct an open public process that will allow those most impacted by the Centerfield Taxiway to understand and comment on a project that could affect them for generations to come.

Sincerely,  
  
Thomas M. Menino  
Mayor of Boston

cc: Thomas Kinton, Executive Director, Massport

# Letter 5

Jeffries Point Neighborhood Association  
Karen M. Maddalena Co-chair  
4 Lamson Street  
East Boston, MA 02128  
(617) 567-6446

September 5, 2006

Mr. John Silva  
Federal Aviation Administration  
12 New England Executive Park  
Bedford, MA 01803

Dear Mr. Silva:


The J.P.N.A. opposes the construction of the Centerfield Taxiway at Logan Airport. Our association believes that the taxiway would increase the levels of noise and air pollution in nearby neighborhoods.

The taxiway would be very close to residential neighborhoods in East Boston and Winthrop. The existing noise and pollution conditions are already intolerable. Having more planes lined up with engines on are unacceptable. The operations on the existing taxiways and runways cause high levels of noise and air pollution. To add more tarmac where planes would be running compounds the negative unhealthy airport impacts.

Noise and air pollutions impacts from Taxiway November are very bad for Orient Heights and Winthrop neighborhoods. Noise and fumes from the taxiways at the southern end of the airport impact the Jeffries Point Neighborhood. Add in the entire take-offs, landing and over flights and side line noise to mix and most in close communities experience severe impacts from airport operations.

In addition, more intersection operations would add more danger than now exists. Residents observe, read about and live with dangerous situations now. To add more operations, more planes and more air and noise pollution is environmental injustice. It is a totally unacceptable proposal.

Sincerely,

  
Karen M. Maddalena  
Co-chair JPNA



# Letter 6

September 15, 2006

John C. Silva  
Manager, Environmental Programs  
Federal Aviation Administration  
Airports Division, ANE-600  
New England Region  
12 New England Executive Office Park  
Burlington, MA 01803

Dear Mr. Silva:

As Officers of the Massachusetts High Technology Council (MHTC), which represents leading employers from across the state's technology economy, we would like to convey our strong support for the proposed Centerfield Taxiway at Logan Airport. The taxiway, a key part of critical airside improvements at the region's largest airport, will reduce avoidable delays, have negligible environmental impacts and benefits to certain neighborhoods and, above all, make the airfield safer. I encourage the FAA to make a final decision of record in support of the Centerfield Taxiway by the close of 2006.

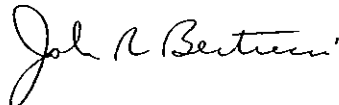
MHTC's member companies are key players in the national and global economies and rely on the efficient flow of people and goods into and out of New England. Costly and preventable delays are detrimental to our economic position and to the entire region. According to Massport, delays totaled 142,000 hours in 2000 at Logan – the sixth worst airport in the nation for delays – leading to more than \$300 million in lost business time and travel costs each year.

The Centerfield Taxiway provides three primary benefits:


- It makes Logan safer by simplifying airfield traffic patterns;
- It provides Logan passengers with fewer delays, and works in concert with the newly constructed fifth runway at Logan;
- By reducing traffic backups it expedites the movement of aircraft away from nearby communities, reduces certain emissions and results in negligible noise impacts.

We urge you to issue your final decision of record in support of this solution by December 2006. Please feel free to contact us directly if you need any more information during your final decision making process.

Sincerely,



John R. Bertucci  
MHTC Chairman  
MKS Instruments  
Executive Chairman



James P. Regan  
MHTC Vice Chairman  
Dynamics Research Corp.  
Chairman, President and CEO



Christopher Anderson  
MHTC President

# Letter 7



"Harvey"  
<harvey@jenfayme.com>  
09/19/2006 10:35 PM

To Gail Lattrell/ANE/FAA@FAA  
cc  
bcc  
Subject Centerfield Taxiway Committee

Hello Gail:

Regarding the "Draft Written Reevaluation of Environmental Impact Statement, Airside Improvements Planning Project Centerfield Taxiway, Logan International Airport, Boston, Massachusetts" dated June 30, 2006, attached hereto are my comments on that report and the proceedings of the Centerfield Taxiway Committee of which I was an appointed representative of the Town of Winthrop.

Contrary to your suggested in an earlier e-mail message to me, I am not submitting these remarks for review, evaluation or censorship by Mr. Silva or anyone else. I am submitting them as a member of the Centerfield Taxiway Committee, appointed by the Chief Executive of the Town of Winthrop to represent the Town and as such I expect that the comments of each member of the committee who submit such will be included as submitted as a permanent part of the final report.

Please advise if there's any problem opening the attachment or anything else needed from me as a member of that committee.

By the way, for your information, regarding notice of the extension of the comment period, I never did receive notification of the extension from the FAA.

Harvey A. Maibor  
33 Court Road  
Winthrop, Massachusetts 02152  
harvey@jenfayme.com



Comments on CFT Draft Reevaluation Report.doc

# M

Harvey A. Maibor  
33 Court Road  
Winthrop, Massachusetts 02152-2309  
Wednesday, September 06, 2006

Hello Gail:

Reference is made to "Draft Written Reevaluation of Environmental Impact Statement, Airside Improvements Planning Project Centerfield Taxiway, Logan International Airport, Boston, Massachusetts" dated June 30, 2006

Submitted herewith are my comments on subject report recently released for public comment. Please advise if this needs to be submitted in some other fashion; a different addressee, by regular mail, etc. In the absence of any information from you to the contrary, I will assume that this is properly submitted through you. Thank you for your assistance with this and throughout the entire process. I'm sure we'll be working together again in the future and I wish you well.

#### BACKGROUND:

The remarks contained herein concern both the subject report and the proceedings of the Centerfield Taxiway Committee whose product was to be the subject report. These remarks are based upon my participation in the committee and the discussions, representations and presentations that took place during its proceedings, as a duly appointed representative of the Town of Winthrop, appointed by the then Chief Executive (Chairman of the Board of Selectmen). Therefore, contrary to a suggestion made to me by the FAA, these comments are not submitted for review, evaluation or censorship by Mr. Silva of the FAA or anyone else. They are submitted for inclusion as a permanent part of referenced report from a duly authorized member of the committee and a representative of the Town of Winthrop to that committee. As such I expect that these comments, as those of each member of the committee, will be included as submitted (unaltered) as a permanent part of the final report.

**Comments on the "Draft Written Reevaluation of Environmental Impact Statement, Airside Improvements Planning Project Centerfield Taxiway, Logan International Airport, Boston, Massachusetts" dated June 30, 2006. Submitted by Harvey A. Maibor, Representative of the Town of Winthrop to the Centerfield Taxiway Committee.**

The above referenced report has been released as a report of the reevaluation of the Centerfield Taxiway project. The scope of that reevaluation was specifically limited to its northern end and the potential impact on noise and pollution upon the near in neighborhoods of Boston and Winthrop. This reevaluation was directed to be conducted via a committee which would include citizen representatives of the two municipalities. Although the creation of the committee and its proceedings may have met the "letter of the law," neither met its spirit!

Although six citizen representatives, three from the City of Boston and three from the Town of Winthrop, duly appointed by their respective Chief Executives as the representatives of their city/town to the Centerfield Taxiway Committee, the body to which they were appointed was not structured as nor did it function as a "committee" by commonly accepted definition. Take note of this part of the definition; "... a body of persons delegated to consider, investigate, take action on, or report on some matter..." See that there's no distinction made between and amongst members implying equal standing. Equal standing was not the case; investigations were permitted only for and by the FAA or their consultants. Subsequent reporting was similarly by the FAA and its consultants. There were no investigations, reporting or presentations by the citizen members. This body was controlled and run entirely by FAA personnel with citizens as spectators, not as fully empowered committee members. Requests made for additional information, interaction with other groups, reordering of priorities, other topics to be discussed, and especially interaction with Massport, etc. were summarily denied by FAA. For example a request was made by a citizen member that the committee attend an upcoming meeting of the FAA with Massport on the matter; denied. The committee's membership, relatively stable on the citizen side (there were two persons replaced due to inability to continue to serve) was continuously changed on the FAA side to accommodate their need for specific presentations justifying the need for the taxiway. The citizen members did not have consultants in attendance. When a request was made that an expert in an area of concern to the citizens for attendance as a consultant was made, his attendance was not allowed by FAA.

Proceedings of the body were entirely composed of presentations by FAA personnel and their consultants to the citizens, with citizen comment. All presentations, except in the very beginning, were supportive of the construction of a centerfield taxiway. Early on, FAA consultant presentations were less

supportive of the project and more sensitive to the likely impact on the neighborhoods. That consultant was dismissed and replaced by another more in tune with FAA's desired result.

Subject report includes a major item under the heading "Minutes of the Proceedings of the Centerfield Taxiway Committee." Note the definitions; "the official record of the proceedings...", "minutes must be read/approved at some future meeting," "the fact that previous minutes were read and approved or approved with corrections," "the fact that certain reports were presented," "capture the flow of the discussion."

The documentation presented under the caption of "minutes" does not meet the definition. These are not an accurate and complete representation of the proceedings. These are instead the recollections (notes) of the recorder who also served as moderator. These recollections were never submitted for formal approval, correction and acceptance as an accurate, complete representation of the proceedings by the committee members. These recollections are incomplete, omitting much pertinent discussion. These recollections attribute various comments to the wrong person. In fact these recollections are constructed to support the FAA's desired outcome. For example, there was a heated discussion regarding impact on health. It was dismissed by an FAA employee stating that health issues were not the responsibility of the FAA! There was no recognition at all that it was indeed the responsibility of the citizen representing his community. In another instance, an FAA employee condescendingly agreed with a citizen that placement of the Centerfield Taxiway would increase the number of aircraft spewing pollutants and noise closer to the neighborhoods. FAA at that point discontinued further discussion of the issue.

In a subsequent community meeting held in East Boston, Massport presented its arguments in support of the taxiway project. During that presentation, it was stated that there were no additional negative impacts on the communities discovered during the Committee's reevaluation. That is factually incorrect! FAA or their consultant clearly showed that there was an expected increase in average noise of 1.5 db. They also added that the threshold which would require a fix was 3 db. Therefore an increase of 1.5 db was "of no consequence" and didn't require further action. Surely there is a difference between "no additional adverse impact" and an increase in negative impact, even if "that doesn't rise to a level requiring correction." This example points out the inconsistencies, etc. between versions of the conclusions. If as in this example there are indeed adverse impacts relating to noise, regardless of the level to which they rise, then what of other adverse impacts? When a report of findings is issued under the guise of the result of a committee's efforts and the two sponsoring agencies, one federal, one state, report those findings differently, there can be no confidence in either by the affected communities.

In summation, the citizen members of the committee were placed into a roll as spectators at a showing. This was not a reevaluation but rather a reiteration of formerly presented justifications for the project. The process did not follow the dictate; discovery and participation was severely controlled and was therefore faulty.

It can only be concluded that from a faulty process only a faulty conclusion can result!

Harvey A. Maibor  
Citizen member of the Centerfield Taxiway Committee  
Representing the Town of Winthrop



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
250 Washington Street, Boston, MA 02108-4619

**Letter 8**

MITT ROMNEY  
GOVERNOR

KERRY HEALEY  
LIEUTENANT GOVERNOR

TIMOTHY R. MURPHY  
SECRETARY

PAUL J. COTE, JR.  
COMMISSIONER

September 20, 2006

Mr. John C. Silva  
Federal Aviation Administration  
New England Region, Airports Division, ANE-600  
23 New England Executive Park  
Burlington, Massachusetts 01803

Dear Mr. Silva:

Thank you for the opportunity to comment on Draft Written Reevaluation of Environmental Impact Statement for the Airside Improvements Planning Project Centerfield Taxiway at Logan International Airport, Boston, Massachusetts [herein referred to as the Draft Written Reevaluation]. The focus of our comments is on the air quality analysis summarized in the Draft Written Reevaluation and in Appendix C: Air Quality Analysis of Aircraft Taxiing & Queuing Alternatives for Taxiway November at Logan International Airport and Appendix F Air Quality Analysis of Aircraft Taxiing & Queuing Alternatives for the Proposed Centerfield Taxiway at Logan International Airport.

As you may know, the Massachusetts Legislature tasked the Massachusetts Department of Public Health, Center for Environmental Health (MDPH/CEH) to conduct a study of the health impacts of the Logan International Airport "...on any community that is located within a 5 mile radius of the airport and is potentially impacted by the airport." The goal of the Logan Airport Health Study is to assess the prevalence of certain health outcomes among residents of selected communities, with an effort to determine the possible relationship between opportunities for environmental exposure to activities at Logan Airport, and the health outcomes of interest, which include respiratory, cardiovascular, and auditory endpoints. The two key components of the Logan Airport study are health outcome data and environmental exposure data. With respect to health outcome data, health survey data have been collected from over 6000 residents in the study area. For environmental exposure data, our extensive review of the Massachusetts Department of Environment Protection (MADEP) air quality monitoring data in metropolitan Boston that is collected to assess compliance with NAAQS, the dispersion modeling analysis in the *Logan Airside*

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B

Improvements Planning Project Supplemental DEIS/FEIR,<sup>1</sup> and the air quality data reported in Massport's Environmental Data Reports (EDR) (e.g., annual emissions inventory and NO<sub>2</sub> monitoring data) determined that the data are too limited to be used to evaluate environmental exposures associated with operations at Logan Airport.<sup>2</sup> As a result, we are conducting dispersion modeling to quantify the air quality impacts from operations at Logan Airport. This information will be used to refine the exposure classification of study participants and improve the sensitivity of the study results. Massport has assisted MDPH/CEH in this effort by providing input files used to calculate the annual emissions inventory.

B  
C

The air quality analysis in the Draft Written Reevaluation reports that the total annual emissions associated with the Centerfield Taxiway are about 850 tons per year and that local air quality in the areas of East Boston and Winthrop will "not likely" experience any measurable effects from either alternative associated with these emissions. However, we believe that further analysis may add to a clearer understanding of potential impacts.

D

Specifically:

(1) The "qualitative<sup>3</sup> and quantitative analysis" approach does not consider exposure to pollutants from the dispersion of emissions associated with taxiing/idling of aircraft on the taxiways. Environmental impacts cannot be determined based on increases or decreases in the emissions inventory alone. As previously noted, the assessment of potential health impacts associated with environmental pollutants needs to consider exposure to ambient pollutant concentrations from airport-related operations and the health effects potentially associated with airport-related contaminants. This is particularly important considering the proximity of residents north of the airport that may be directly exposed to emissions from aircraft operations. The U.S. Environmental Protection Agency's (US EPA) certified dispersion models, including the dispersion model (AERMOD) in FAA's Emissions Dispersion and Modeling System (EDMS), are available to estimate ambient pollutant concentrations based on airport-related emission estimates; however, the air quality analysis in the Draft Written Reevaluation only evaluates the input data (i.e., emissions inventory data) to the dispersion model.

E  
F

(2) The NO<sub>2</sub> air quality monitoring data do not specifically address taxiing/idling operations at the north end of the airport. According to the emission profile for aircraft engines, nitrogen oxide emissions dominate during takeoff and climbout and particulate matter and volatile organic compound (PM and VOC) emissions dominate during taxiing/idling. Nitrogen oxides

G  
H

<sup>1</sup> The Draft Written Reevaluation concluded that the dispersion modeling results from this analysis indicated that these emissions will not cause nor substantially contribute to any violation of the National Ambient Air Quality Standards. Furthermore, it was concluded that the differences in emissions between the alternatives evaluated in Draft Written Reevaluation are not expected to exceed the *de minimis* emission thresholds contained in the Federal Clean Air Act General Conformity Rule.

<sup>2</sup> The Draft Written Reevaluation concluded that "Using emissions inventory data it was determined that neither alternative is expected to have a significant impact on regional air quality conditions. This is because the differences in the amounts of emissions between the alternatives are small when compared in context to the total amounts associated with the airport. Local air quality in the areas of East Boston and Winthrop, which are closest to Taxiway November, will also likely not experience any measurable effects from either alternative for much the same reason."

<sup>3</sup> For example, we are not aware of environmental assessment methods in which a "qualitative analysis of the amounts and locations of aircraft emissions generated and released on the Centerfield and November Taxiways are evaluated by air quality specialists with training and experience to help determine the effect (if any) these factors have on the air quality conditions both regionally and locally." Further scientific evidence is needed to support this study approach.



(NOx) are not a surrogate for particulate matter (PM) or volatile organic compounds (VOCs). It should also be noted that Massport has proposed an extensive monitoring program to address the paucity of data to characterize emissions associated with operations at Logan Airport that was identified by EOEa in the 2001 Certificate of the Secretary of Environmental Affairs on the Final Environmental Impact Report.<sup>4</sup>

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(3) Compliance with regional air quality planning program associated with NAAQS or the Conformity Rule is not intended to address local impacts from emission sources. Regional air pollutant impact analyses are by design not intended to also address local impacts.

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It is important to assess exposure to airport-related emissions, including those at ground level during taxiing/idling, with respect to respiratory and cardiovascular effects in humans and their association to such emissions as indicated in the medical literature.<sup>5</sup> For example, ultrafine particles (UFPs) need to be considered because they are the major particulate fraction emitted from aircraft engines. UFPs are important because current epidemiological evidence supports associations between inhalation of fine ( $\leq 2.5 \mu\text{m}$ ) and ultrafine ( $\leq 0.1 \mu\text{m}$ ) ambient particulate matter and increases in cardiovascular and respiratory morbidity and mortality (Delfino et al., 2005; Penn et al., 2005). UFPs are capable of efficiently carrying and transporting large amounts of absorbed or condensed toxic air pollutants into the respiratory tract (Sioutas et al., 2005). In addition, volatile organic compounds (VOCs) need to be considered because exposures to certain levels pose potential carcinogenic and non-carcinogen risks (US EPA, 2006).

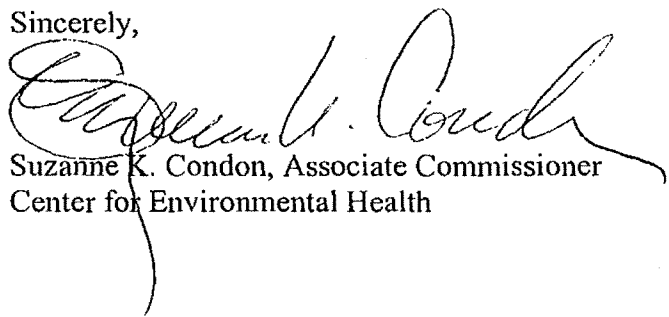
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Therefore, we believe that the finding that local impacts associated with airport operations, including taxiing/idling on the proposed Centerfield Taxiway, are "not likely" could be determined by evaluating both air quality and human health impacts associated with airport emissions based on standardized health assessment protocols.

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Thank you again for your consideration of these comments. If you have any questions, please feel free to contact me at 617-624-5757.

Sincerely,



Suzanne K. Condon, Associate Commissioner  
Center for Environmental Health

<sup>4</sup> Massport has recently reported to the DPH/CEH that the existing NO<sub>2</sub> monitoring program is not adequate to characterize the emissions and their impact in surrounding communities from airport operations including emissions from the proposed Centerfield Taxiway and has proposed an extensive monitoring program for a suite of pollutants to address this short fall. It is important to note that nitrogen oxides are primarily emitted during high engine power during takeoff and climbout and they are not correlated with particulate matter emissions.

<sup>5</sup> References listed in attachment.

References:

Delfino, RJ, Sioutas C, Malik, S. 2005. Potential Role Of Ultrafine Particles In Association Between Airborne Particle Mass And Cardiovascular Health. *Environ Health Perspect* 113(8)934-936.

Penn, A, Murphy, G, Barker, S, Henk, W, Penn, L. 2005. Combustion-Derived Ultrafine Particles Transport Organic Toxicants to Target Respiratory Cells. *Environ Health Perspect* 113(8)956-963.

Sioutas, C, Delfino, RJ, Singh, M. 2005. Exposure Assessment for Atmospheric Ultrafine Particles (UFPs) and Implications in Epidemiologic Research. *Environ Health Perspect* 113(8)947-955.

United States Environmental Protection Agency (US EPA). 2006. 1999 National-Scale Air Toxics Assessment. <http://www.epa.gov/ttn/atw/nata1999>.