



*The Commonwealth of Massachusetts*  
*House of Representatives*  
*State House, Boston 02133-1054*

**Letter 9**

**REPRESENTATIVE**  
**ROBERT A. DELEO**  
19TH SUFFOLK DISTRICT  
ROOM 243, STATE HOUSE

Chairman  
Committee on  
Ways and Means

TEL: (617) 722-2990  
FAX (617) 722-2998  
E-Mail: RDeleo@hwm.state.ma.us

September 21, 2006

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

*Re: Logan Airport Centerfield Taxiway*

Dear Mr. Silva:

I write to express my strong opposition to the construction of a new Centerfield Taxiway at Boston's Logan Airport. These comments are provided in response to the *Additional Taxiway Evaluation Report* ("the Report") as required by the Federal Aviation Administration's (FAA's) August 2, 2002 Record of Decision for the Logan International Airport Airside Improvements Planning Project. As the Massachusetts State Representative for the Town Winthrop and a portion of the City of Revere, I oppose any construction at Logan Airport which could have a negative affect on the health and quality of life of my constituents. I believe the construction of the Centerfield Taxiway poses such a threat and will offer my comments on the conclusions of the report as they were presented. In short, I wish to convey my strong opposition to proceeding with construction of the taxiway and urge the FAA to forego pursuing the matter further.

The report concludes, after evaluating two alternatives with respect to varying extremes of taxi/queue time management of the proposed Centerfield taxiway and Taxiway November, that:

*"Since the two alternatives bracketed the range of environmental effects that could be expected for the full range of plausible use of the taxiways, no operational action could be identified that would yield environmental benefits. It follows that FAA could operate the taxiways without restrictions and not cause environmental impacts on the community adjacent to the north end of the airfield."*

I am not in a position to dispute this claim posited above. However, several issues arise even if this conclusion is accepted. First, the Report failed to evaluate a no-build scenario. It is standard practice in any environmental evaluation of a proposed construction project to include a

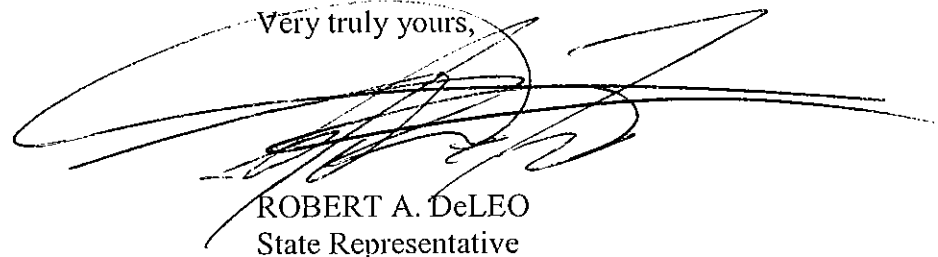
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no-build scenario against which other scenarios can be compared. The Report only presents two alternative extremes which it dismisses as having no appreciable environmental benefits or detriments, and therefore concludes that the FAA "could operate the taxiways without restrictions and not cause environmental impacts on the community." However, without evaluating a no-build scenario, the community and environmental regulators cannot fully evaluate the project's safety and impact on our neighborhoods. If sufficient operational mitigation cannot be implemented, then adopting the no-build alternative is required due to the detrimental affects of increased noise and air pollution proceeding with project construction could cause to citizens who live in close proximity to Logan Airport.

I am further concerned that the proposed taxiway will allow the Massachusetts Port Authority ("Massport") to eventually petition for an increase in aircraft operations beyond the present cap. While primarily a function of runway availability rather than taxiway configuration, the construction of a centerfield taxiway cannot be viewed as separate from a general desire on the part of Massport to expand the capacity of Logan Airport to meet increasing air travel demand. This desire, however, is antithetical to the fact that Logan Airport cannot be considered as the only answer to expanding air transportation requirements in the future. Moreover, given that the Commonwealth of Massachusetts Department of Public Health is currently undertaking a study of the respiratory health affects of Logan Airport on surrounding communities, proceeding with major airport construction and expansion is, at the very least, premature.

Thank you for your consideration of my comments on this matter. Please call on me if I may provide any additional information or assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert A. DeLeo", is written over a large, faint circular stamp or watermark. The signature is fluid and cursive, extending across the width of the page.

ROBERT A. DeLEO  
State Representative



**Letter 10**

**TOWN OF WINTHROP  
TOWN COUNCIL  
Town Hall  
1 Metcalf Square  
Winthrop, Massachusetts 02152**

President:  
Thomas E. Reilly

September 21, 2006

Vice President  
Russell C. Sanford  
Precinct 5:

Councilors-at-Large:  
Joseph V. Ferrino, Jr.  
Philip R. Boncore

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

Precinct 1:  
Richard D. Gill

Precinct 2:  
James Letterie

Dear Mr. Silva:

Precinct 3:  
Nicholas A. DelVento

Precinct 4:  
Jeanne L. Maggio

Precinct 6:  
Linda J. Calla

Susan J. Duplin  
Clerk of the Council

I am submitting comments on behalf of the Town of Winthrop regarding the Logan Airport Centerfield Taxiway. I do not believe that the Federal Aviation Administration has adequately addressed the significant environmental issues involved in this project and the effects of the proposed taxiway on the Town of Winthrop. The report should have specifically dealt with the noise and air pollution consequences of locating the taxiway 1000 feet closer to the nearby homes that are already extremely close to the airport.

The Town of Winthrop is at a distinct disadvantage in reviewing your technical documents. We are a small town and must rely on a few volunteers and some part time elected officials to respond to documents produced by your extensive staff and consultants. In spite of the limitations, the Town of Winthrop and numerous citizens have expressed serious concerns that are not addressed by your evaluation report. These include but are not limited to the following:

1. The FAA evaluation makes no mention of the Massachusetts Secretary of Environmental Affairs 2001 findings that the taxiway construction be contingent upon specific actions by the Massachusetts Port Authority ("Massport"). The Secretary's decision specifically mandated the completion of an air quality study to be conducted by Massport and the Massachusetts Department of Public Health. Since the additional evaluation was to address the concerns of the neighbors this omission is not understandable.
2. The report does not describe the likely effect on air quality that would occur by moving the taxiway so close to the Winthrop residents. The report appears to measure total emissions. It also goes to great length to compare two alternative uses of the proposed taxiway but fails to address the specific issue of what will occur in Winthrop.

Mr. John Silva

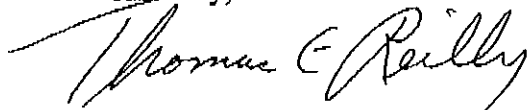
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3. The noise analysis uses "annual averages" as the criteria to evaluate the noise impact. The annual average does not adequately reflect the detrimental effects of increased noise on the closest neighbors. The final conclusion of the FAA noise evaluation is based on a comparison between two artificial alternatives created by the FAA. There is no specific information on the expected noise effect in the Court Road area of Winthrop.
4. One of the principal purposes of the evaluation was ostensibly to address the concerns of residents. The FAA actions regarding public participation and input have been unsatisfactory. Winthrop, at the request of the FAA, designated three citizens to represent the community, as did Boston. The community representatives have stated that their presentations were given little if any consideration by the FAA. The fact that public participation in this critical review was limited to only the representatives and that they were virtually ignored is extremely troubling.

In conclusion, it is Winthrop's position that the FAA Report is not reliable for the purpose of making any decision on the taxiway project. Until the FAA properly addresses the concerns of the neighbors with direct public participation and thorough analysis, we ask that no approval be made.

Sincerely,



Thomas E. Reilly  
Council President

Committee on Financial Services

Committee on Transportation &  
Infrastructure

Democratic Steering & Policy  
Committee

[www.house.gov/capuanof/](http://www.house.gov/capuanof/)



Congress of the United States  
House of Representatives

Michael E. Capuano  
8th District, Massachusetts

**Letter 11**

Washington Office:  
1530 Longworth Building  
Washington, D.C. 20515-2108  
202-225-5111  
Fax: 202-225-9322

District Offices:  
110 First Street  
Cambridge, MA 02141  
617-621-6208  
FAX: 617-621-8628

Roxbury Community College  
Room 110

September 22, 2006

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

Dear Ms Corbett:

I am writing to offer my comments on the proposed centerfield taxi-way at Logan Airport. Public safety is a critical issue and I am always inclined to support plans that will directly contribute to airport and air travel safety. However, the manner in which the taxi-way plans were delivered to the community raises questions to me about the overall long term plans that the FAA and Massport have regarding the use of the taxi-way. Therefore I cannot support this project.

The basic fact that numerous elected officials had to implore Massport and the FAA to have a more open and extended community process is a strong indication that neither agency has learned anything about being a good neighbor in the last thirty years. I am also perplexed by the fact that after extending the community process by 30 days, the FAA would hide behind federal regulations in an effort to not appear at a public Boston City Council hearing convened by City Councilor LaMattina on September 6, 2006. This meeting was a great opportunity for the FAA to answer community concerns about the environmental and health impacts that the taxi-way would have on its neighbors. By not showing concern for these neighbors, or appearing at the public meeting, I believe that the FAA perceives the building of this taxi-way as a forgone conclusion.

Should Massport and the FAA go forward with the plans to build this taxi-way I want the community to be assured that it will only be used to alleviate concerns regarding runway safety. I strongly urge that assurances be put in place to guarantee that the taxi-way not be used to increase airport capacity. I would also like to see plans to project and more closely monitor the environmental impact of idling aircraft, both before and after the proposed taxi-way is put in place.

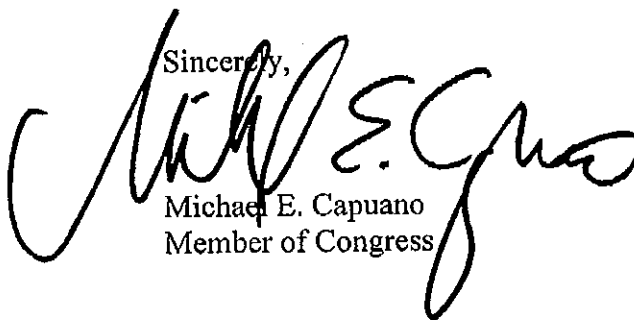
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The biggest question that I have is whether the proposed taxi-way's attempt to alleviate short term runway safety concerns outweighs the long term health and safety on the surrounding neighborhoods? I have yet to see any evidence that affirmatively answers that question and therefore cannot support this proposal.

Thank you for your attention to this matter. If you have any further questions please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Capuano". The signature is fluid and cursive, with the first name "Michael" being the most prominent part.

Michael E. Capuano  
Member of Congress



# CITY OF BOSTON

## THE ENVIRONMENT DEPARTMENT

# Letter 12

Boston City Hall, Room 805 • Boston, MA 02201 • 617/635-3850 • FAX: 617/635-3435

September 22, 2006

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

Re: Logan International Airport Additional Taxiway Evaluation Report and Draft Written Reevaluation of Environmental Impact Statement - Airside Improvements Planning Project Centerfield Taxiway

Dear Mr. Silva:

The City of Boston Environment Department has reviewed the Logan International Airport Additional Taxiway Evaluation Report and Draft Written Reevaluation of Environmental Impact Statement - Airside Improvements Planning Project Centerfield Taxiway (Taxiway Reevaluation) and offers the following comments.

The FAA identifies the Centerfield Taxiway (Taxiway), an element of the Logan International Airport Airside Improvements Planning Project (AIPP), as the largest contributor to taxiway delay reduction with other taxiway improvements providing a "relatively" fixed delay benefit. The Taxiway would be used in conjunction with existing taxiways and, according to the FAA's analysis would provide alternative taxi routings and more efficient aircraft movement between terminals, reducing ground delays. Although it would increase aircraft queuing capacity on the airfield, the FAA has asserted that the Taxiway would not add capacity to Logan and would not result in adverse noise or air quality impacts.

In the Final Environmental Impact Statement (FEIS) for the AIPP, the FAA indicated that the Taxiway would not violate state or federal air quality standards or exceed general conformity thresholds. As a result, it was presumed to conform to the State Implementation Plan (SIP).

Operational benefits to Logan do not necessarily translate into environmental benefits. Only small reductions in ground noise are forecast if a Centerfield Taxiway is constructed

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and high-frequency noise from the increased number of queuing, taxiing high-bypass engines will affect the Bayswater Street and East Boston Yacht Club areas and the Loring and Court Road sections of Winthrop. Massport's 2004 Environmental Status Planning Report (ESPR) showed that there will be an increase in Boston residents in the 70-75 and 75-80 dBA contours in 2020 attributed to increased use of the parallel Runways, 22R and 22L between which the proposed taxiway would be constructed. | C

In the August 2, 2002 Record of Decision (ROD) for the AIPP, the FAA deferred a decision to approve the Taxiway subject to an additional evaluation of Taxiway operations north of Runway 15R-33L. Among the tasks outlined for the two-phase study were the assembly and review of recent field monitoring results (e.g., noise and air quality impacts); analyses of taxi operations, their impacts, or potential mitigation measures north of Runway 15R/33L and the further field studies, if warranted, to document existing impacts associated with taxi operations (e.g., noise monitoring, air quality).

The FAA evaluated during the study 16 candidate Actions proposed by community representatives and three identified by FAA staff. They included Taxiway November operational and use changes, the construction of berms at the north end of the airfield, the installation of sound barriers around the north end of the airport, increasing the use of other airports to reduce traffic at Logan and monitoring air quality for taxi operations at the north end of the airfield. All were rejected with negative safety, efficiency and capacity effects cited most often. The Reevaluation Report states that there are air quality monitors in line with Runways 22L/22R in East Boston and Winthrop, that they monitor taxiway operations and that there have been no recorded violations of ambient air quality standards. The FAA concluded that the FEIS data and evaluation were adequate, accurate, current and valid and that the Taxiway should be constructed. | D

We question some of the methodologies used to reach the conclusions in the Taxiway Reevaluation. For example, on an unspecified date during the summer of 2003 during a 24-hour period when Runways 22L and 22R were in continuous use, FAA staff in the Boston Tower kept a log of the status of the queue on Taxiway November. It was used to develop a model of the taxi/queue times for each aircraft. The model was extended to compute taxi/queue times under a scenario where a maximum of five turbojet aircraft were in queue north of the intersection with Runway 15L at all times. The times were then scaled up to represent the number of operations on a worst-case busy day. The FAA concluded that the option under study, revising the existing Noise Abatement Order to further limit the number of queued aircraft on Taxiway November (Action 2), would result in an adverse impact on operational efficiency, flexibility and safety.



A Day-Night Sound Level (DNL) value was calculated for the same Action using the same operational assumptions using an unspecified model. Five categories of aircraft for which noise emission characteristics in the taxi/idle mode are known were factored into the model.

We question why the date the FAA kept the log of queuing on Taxiway November is not identified and why it was necessary to scale up the data to simulate a worst-case busy day. Given the extensive use of Runways 22L and 22R and the FAA's knowledge operation schedules, operations characteristics by time of year and by day of the week, it should have been possible to choose a busy, fully-scheduled day rather than creating a model.

The Reevaluation Report does not indicate if the noise emission characteristics of the aircraft were for empty aircraft or for those fully loaded with passengers, baggage and cargo. It would also seem that taxi/idle noise emissions data does not provide a complete picture. If aircraft were to be queuing on Taxiway November and on a Centerfield Taxiway, they would generate noise when turning onto a runway. Making the turn would not be conducted in taxi/idle mode and it appears that an increase in sound at that point is not accounted for in the model. Given the greater frequency with which aircraft could depart in a Taxiway November/Centerfield Taxiway scenario, it would seem that the model would underestimate noise.

The Air Quality Evaluation for Action 2, using the same underlying assumptions as those for the operational and noise analyses, was designed to assess emissions along Taxiway November and their potential impact on the region and nearby residential areas of East Boston and Winthrop. Using a quantitative and qualitative analysis, the FAA concluded that there would be no impact on regional air quality and that "areas of East Boston and Winthrop, which are closest to Taxiway November, will also likely [emphasis added] experience any measurable effects from the [maximum of five turbojet aircraft were in queue north of the intersection with Runway 15L at all times scenario]. Failing to take into account emissions that would be generated by aircraft on a proposed Centerfield Taxiway and making a conclusion about "likely" local air quality conditions calls into question the credibility of this effort.

As the City of Boston has asserted at numerous times, actual data, whether monitoring aircraft numbers, noise or air quality characteristics, is preferable to modeling as it provides information about the actual experience of residents.

This department does not believe that compliance with the SIP should be a benchmark for measuring air quality characteristics along the airport perimeter and in nearby neighborhoods. That the Boston Metropolitan Area is in attainment for criteria pollutants cannot reasonably be used to suggest that preventing new emissions at Logan is unnecessary. Compliance with the National Ambient Air Quality Standards (NAAQS), alluded to in the Action 2 conclusion about regional air quality, is not relevant to local air quality impacts. This is particularly true for Logan

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Airport because of its close proximity to residential communities. For example, attainment of the particulate matter (PM) standard based on centrally-located monitors that are sited several miles from the airport does not take into account the increased spatial concentration gradient of ambient PM immediately downwind of runways with over 1000 aircraft landing and departing on a daily basis at the airport. Ambient concentration data and health information are necessary to accurately assess the air quality characteristics at and around Logan and to determine the potential effect of the proposed taxiway.

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We also are concerned that increases or decreases in emissions inventory data form the basis of the exposure assessment. Emissions inventories do not provide information on the spatial and temporal pollutant concentrations on a daily or annual basis, which is required when conducting environmental health assessments.

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In April 6, 2001 comments on the FEIR/SDEIS for the AIPP, Ira W. Leighton, Acting Regional Administrator of EPA Region 1, recommended that the Massachusetts Port Authority (Massport) "reduce airside and access emission to the maximum extent at Logan Airport prior to supporting regional reduction measures or emissions trading. Massport should continue to support converting ground support equipment and ground service vehicles to clean alternative fuels including compressed natural gas (CNG) and electricity by writing such strategies in leases and agreements with the air carriers and service providers. EPA supports expansion of the ongoing "Clean Air Partners" program where tenants can receive reimbursement for electric ground support equipment." The FAA responded by saying that, "FAA supports Massport's voluntary efforts with its tenants to decrease emissions at Logan Airport. FAA has a national stakeholder process involving various industry groups and believes this issue should be addressed at the national level." This suggests that where air quality is concerned, local needs are under-emphasized and facility-based solutions considered inappropriate. The City of Boston, clearly a stakeholder, has not been brought into such a process nor has it received information about substance or progress. A national-only perspective limits the potential for airport operators, tenants and air carriers to voluntarily cooperate in measures to avoid or minimize the negative affects of airport operations on human health. We are concerned that this approach has limited the options in this situation as well.

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Insufficient work has been done to identify the air quality impacts of Logan's operations at its perimeter and in surrounding neighborhoods. It is incumbent upon the FAA and Massport to work collaboratively on this important issue.

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Massport cited in the Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) for the AIPP two soot studies released in 1997 showing that deposition of airborne particles in surrounding neighborhoods was not the result of aircraft operations. At that time, the Boston Air Pollution Control Commission (APCC) raised several questions about the

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thoroughness and reliability of the protocol and accuracy of the results. East Boston residents continue to note soot deposition and strong odor emanating from Logan. These matters deserve further study. M

In his June 15, 2001 Certificate of the Secretary of Environmental Affairs on the Final Environmental Impact Report for the AIPP, then-Secretary Bob Durand cited a series of measures that led to his finding that "issues of air quality impacts have been adequately addressed for purposes of MEPA review." These measures are:

- develop of a program by Massport to maximize the use of single-engine taxiing procedures by all of its tenant airlines;
- follow-up air quality monitoring in neighborhoods surrounding the airport and surrounding flight paths; and
- Massport's agreement to work with EOEA on structuring a proposed Air Quality Initiative (AQI). The Certificate indicated that Massport was "to solicit project submissions from local governments and community groups, which will be reviewed in an objective, science-based process by a neutral organization such as NESCAUM." N

We note that the FAA opposed Massport's Air Quality Initiative (AQI) as did the Air Transport Association, the major air carrier trade group, which threatened litigation, claiming that the AQI violated federal law. O

Additional comprehensive air quality study using Environmental Protection Agency- (EPA) validated monitoring methods is necessary to ensure that the operation of a Centerfield Taxiway will be safe for neighboring residents. The issue of passive vs. active monitoring must be thoroughly studied in developing a protocol. Critical components of a study, some of which are already being implemented by the Massachusetts Department of Public Health, should include:

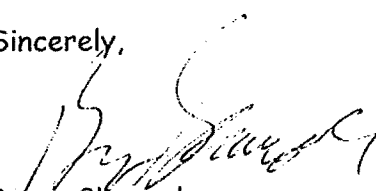
- compilation of a database on emission factors for aircraft engines typically found at Logan;
- detailed monitoring for nitrogen oxide (NO<sub>x</sub>), volatile organic compounds (VOCs) PM<sub>10</sub>, PM<sub>2.5</sub> and ultra-fine particulate matter;
- a particulate deposition element using data from actual jet engine test cell sampling to provide more accurate particle speciation of soot collected from the surrounding neighborhoods;
- an analysis of the contribution of tire and brake wear from aircraft landings to particle deposition in neighborhoods adjacent to Logan;
- identification of all significant sources of air pollutant emissions affecting East Boston and other airport communities, including both Logan airside and landside sources, neighborhood sources, regional and inter-state sources; P

- apportionment of air pollutants among those source to establish the relative contribution of each to pollutant exposures for residents;
- installation and maintenance of permanent fence-line and neighborhood air quality monitoring equipment;
- a plan for on-going monitoring with reporting through the ESPR process; and
- development of a list of recommendations for how to best reduce pollutant concentrations in neighborhoods near Logan.

We agree with former-EOEA Secretary Durand that the methodology for this type of study should be subject to public and independent scientific review prior to implementation. The objectivity inherent in a favorable review will help lend credibility to study results. Concurrence by local and state public health and environmental agencies should also be sought.

The City of Boston believes that the Centerfield Taxiway will increase aircraft queuing with associated noise and pollutant emissions. With decisions about arrivals, departures and taxiway use under the jurisdiction of Boston Tower personnel, neither the FAA or Massport can make an enforceable commitment that the proposed taxiway will reduce the currently intolerable levels of taxiway idling. Until the City and its residents can be assured that public health and safety and quality of life will not be adversely affected by the taxiway, it should not be constructed.

Sincerely,



Bryan Glascok  
Director

cc: James W. Hunt, III, Chief of Environmental and Energy Services, City of Boston  
Michael Kineavy, Director of Policy and Planning, City of Boston  
John Shea, Director, Environmental Hazards Program, Boston Public Health Commission  
Vineet Gupta, Director of Policy and Planning, Boston Transportation Department  
Robert D'Amico, Boston Transportation Department



*The Office of*  
**SALVATORE LAMATTINA**  
*Boston City Councilor - District One*

10. Y. Silva  
ANE-600  
**Letter 13**

September 22, 2006

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

Dear Ms Corbett:

During the course of the last couple of months, my office has received numerous letters from constituents, especially residents in the East Boston and Winthrop neighborhoods, regarding the Centerfield Taxiway proposal at Logan Airport. As you already know, this proposal has recently garnered much attention from residents and is an issue that will significantly affect the quality of life for residents in those communities. Last month in a City Council Hearing, I requested to extend the proposal's deadline to a later date in order to provide residents with adequate information regarding the health, environmental and economic impact that the Centerfield Taxiway will have on the neighborhoods of East Boston and Winthrop.

Throughout the last month, I have collaborated with business, residents and Mayor Menino to develop a better understanding of the impact that the proposal will have on the surrounding communities. After taking a thorough look at the proposal, I have come to the conclusion that the construction of the Centerfield Taxiway will have a negative impact on the neighborhoods that are contiguous to Logan Airport. If approved, the Taxiway will not only add to the noise and air pollution that currently is present and compound the negative unhealthy airport impacts but will also escalate the likelihood of an accident occurring with an increase in intersection operations and the potential for pilots to become confused with the lighting on the runways and the taxiway.

As an elected representative of East Boston, my primary concern is to preserve the public safety of residents. The Centerfield Taxiway will jeopardize the health of the community. Asthma cases in Orient Heights and Winthrop have a higher incidence than any other neighborhood in Boston, which many attribute to the emissions that are released from Logan Airport. In addition, take-offs, landing, over flights and sideline noise combine to cause these neighborhoods to experience severe impacts from airport operations. Thus, if the proposal is approved, the proximity of the taxiway to those neighborhoods will increase the rate of asthma cases and other severe impacts.

After listening to residents' concerns and carefully evaluating the proposal, I strongly urge the Federal Aviation Administration to reject the Centerfield Taxiway proposal.

Sincerely,

  
Salvatore LaMattina  
City Council District 1

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