

Topics	Full Name	City/Town	Your Organization	Does the strategic plan document clearly communicate Massport's priorities in the next ten years?	Please provide any additional written commentary here. Thank you for your feedback.
1 Climate	Brittany R	Boston, East		Agree	I just want to emphasize how important the Net Zero strategy is, especially being in a coastal city which will experience serious impacts from climate change.
2 Climate	Brian K	Carlisle		Neither agree nor disagree	The plan does nothing to limit the adverse climate effects of increasing private air travel and it's impact on local communities. Massport needs to get it's head out of the sand and work to protect the communities around it's airports, not bend over for private aviation. We don't want expansion.
3 Climate	Kathryn S	Carlisle	Myself	Agree	It communicates what's best for massports bottom line, but does little to address public or climate concern. Expanding the airports will increase air traffic, which upsets the majority to appease the few.
4 Climate, Charlestown Properties	Dan J	Boston, Charlestown	Community activist	Neither agree nor disagree	<p>Within Charlestown's MassPorts properties we have a sizable concern with climate mitigation efforts which appear to be lacking! You owe the community an outline on your direction at least. Ideally, some firm actions which knit with the city's direction. Then we have the parking lot on Medford St which is barely used! I would like to see it transferred or leased to the City so needed transit infrastructure can be built within it! I have no problem you also doing this as it would offer the community very needed services. Here we are talking about converting the thin section into about 30 EV charge points as we move forward with the conversion to EV's the community doesn't have the needed street space to have street side charging as most of our streets are just too narrow! The mid section will become a sizable green space park offering an outdoor cafe space with the Transit Hub building nearest to the Lafarge Cement driveway which in parallel offers the MicroBus berths independently of their space accessing Medford And Terminal St's. The green space offers benches and maybe some soft music at the Cafe in the evening hours. A BlueBike station will also be present here so people can ride along the Moran Rail Trail path into Hood Park. Within the Hub building is a sizable lobby for people to wait from the weather and when the weather permits the large garage doors are opened into the outside seating area of the Cafe. The MicroBuses from here connect into the Navy Yard Ferry terminal and in the other direction to Sullivan Sq T station as well as over the hills to CC T station and onwards to Lechmere as well. These two paths open up the north to the south side resources at the Mall and Hood Park and in the reciprocal access for the southern community space access to the playgrounds and fields along the river.</p> <p>This creates this into a sizable people magnet, as the paths along the MicroBus will also pickup people moving between these points. The cafe offers those waiting for the vehicles to charge but also a place to mingle this will become a new Square for future development. This small property becomes a critical space for both of us! As it also serves your workforce's transit needs as well! With direct access at your gates along Terminal St.</p> <p>Yes, there is the DPA Zone which is an issue, but we can derive the energy for the EV area from Wind farms and as we are trying to open up more use of the Ferry it could be argued both offer better use having marine involvement than a barely used parking lot! And if you run it. It offers a very powerful PR win and even a bit of income beyond the costs of maintaining things. Income from the charge park, income from the MicroBus service (from city or private) Cafe and events within the Park space. And most important a loved neighbor as part of our Green Loop.</p>
5 Climate, growth, noise/pollution	Patricia L	Carlisle, MA	Self	Agree	<p>- The Plan does NOT address Climate Change and what Massport is planning to do for that effort</p> <p>- The Plan talks about growth. Every year the plan talks about growth. I understand economic developers goals are to promote growth. These are airports (Logan, Hanscom, Worcester). Growth means more airplane activity which means more pollution and noise and planes overhead. Our little Massachusetts, Boston Area and New England is small. We are already inundated with aircraft overhead constantly. I consistently hear and see airplanes overhead all over the Boston area (when I hike at Fellsway, hike and go to the beach at Cranes Beach, walk at Great Meadow, go to the Library and exercise class in Danvers, when walking around in Harvard square...constant planes overhead. Where I live I have an unacceptable level of planes going over my home &amp; neighborhood all the time from Hanscom, Logan, Beverly, Norwood, Nashua, Manchester, other small New England airports and international flights not going through Logan. Our residences and natural places have become airfields. Massport needs to adjust it's goals away from growth. And it needs to stop any promotion of increased private jet activity. These planes in particular which are heavier polluters and very loud are flying closely over our homes and natural places. This is our homes, our residences. Please reach out to me if I can be of assistance in an effort to move the focus at Massport away from growth as it pertains to increased aircraft activity. I have worked as a consultant for many years and worked for 5 years at SH&amp;E consulting firm that prepared Impact studies for Massport.</p>
6 Climate, sea level rise	Dan J	Boston, Charlestown	Community activist	Neither agree nor disagree	<p>We have a problem! The Sea level is rising! Within the Little Mystic Channel space is the cities only northern public boat launch allowing motor boats to be launched. For years we had an active launch as the boats could get under the Chelsea St bridge most of the time last bit of high or king tide. Those days are now less and less as the water rises! There is a solution! But it requires a bit of give from you MassPort and Flatley, here we are talking about water corridor between your properties which currently offers a dock space within your water space and a few sort stubs from within Flatley's. At one point it also held a boat launch which was an old wooden cradle launch type. Flatley has a set of DPA Zones which they need to deal with, the smaller one can be moved into the space on their side and ideally from your side an equal space can be created with a drive to Medford St so trailers can enter into this combined space as a launch and dock area shared with your tenants needs and a public boat launch. Unlike the Channels, this one could also support larger sailboats as well bringing back a lost option! The Chelsea St bridge took many years ago when the wooden bridge was built. The dock area also needs to be accessible for public access, as there is the possibility the High School might want to establish a hydrofoil ferry connection to East Boston to collect students! As to what happens to the old launch, the space will become a sea water swimming pool! As with the expected population expansion and higher temps our summers are expected to have we need additional cool off places and being sea water instead of chlorine offers some health benefits for many. With the parking lot conversion a water taxi service here might be useful to the airport as well.</p>
7 Community Engagement	John Walkey	Boston, East	GreenRoots	Strongly disagree	The public webinar was one of the worst public meetings I have ever attended. The entire process of this strategic plan is insulting to the communities impacted by Massport across the state - from ports to real estate to air facilities. The Commonwealth has processes for legitimate community engagement instead of box-checking exercises. I suggest you consult with your peers.
8 Ground Transportation, APM	Keith B	Boston, MA		Agree	Connectivity between Logan Airport and public transportation is not mentioned, but currently is in an unusable state. Because of the slow bus from the Airport T station, which comes infrequently and sits at a rental car center for a very long time before going to any terminals, it is not feasible to take the T to Logan. I have been forced to use a vehicle. Improving the transit connection, at minimum by improving the bus but ideally using a people mover like had been in an earlier strategic plan, would make Logan much more accessible. Adding gates only makes the issues of getting to/from the airport more critical.
9 Ground Transportation, APM	Steven B	Boston		Agree	<p>Massport must implement an automated people mover, or an equivalent dedicated transit system, connecting Boston Logan's terminals, Airport T Station, and the rental car center.</p> <p>The current bus based system is inadequate for an airport of Logan's size and importance. It is confusing for travelers, unreliable during peak periods, and routinely delayed by airport traffic. On multiple occasions, I have personally experienced trips from Airport Station to my terminal taking upwards of 45 minutes. A completely unreasonable delay for what should be a short, predictable transfer.</p> <p>A modern people mover would provide a clear, reliable, and accessible connection between airport facilities, improve the passenger experience, and reduce congestion on airport roadways. Peer airports across the United States have demonstrated that automated people movers are a proven and effective solution, and Logan should meet that same standard.</p>
10 Ground Transportation, APM	Maxwell C	Somerville, MA		Neither agree nor disagree	<p>The strategic plan only glancingly refers to the need for improved connectivity between Logan Airport's terminals and the MBTA Blue Line Airport station. Yet this is a critical need that should be highlighted as a priority in the strategic plan.</p> <p>Logan is widely mocked for its poor connection to public transit despite its close proximity to downtown Boston. The shuttle buses that currently circulate between Logan and the Blue Line are infrequent (20+ minute waits), difficult to navigate (many different routes with various pick up and drop off locations), and take too long (circuitous routes, long layovers at the rental car center, traffic and red lights). It feels like roulette whether you'll make your plane if you are traveling to the airport via Massport shuttle bus.</p> <p>While way-finding and efficiency of these bus routes could be improved as a near-term goal, ultimately Massport must move forward with designing, funding, and constructing a grade-separated automated people mover to bring passengers and employees alike between Logan's terminals and the MBTA Blue Line station. Please add this to the strategic plan.</p>

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11	Ground Transportation, Connection to T	Michael D	Somerville		Neither agree nor disagree	Please prioritize connection to public transit. The blue line is so close, but not well interconnected with airport. Also a people mover would be great, connecting all terminals, blue line, rental car.
12	Ground Transportation, Ferry Service	Suzanne B	Sandwich	N/A	Neither agree nor disagree	Your plan needs to add ferry service from Boston to Hyannis
13	Ground Transportation	Andrew G	Boston	Boston University	Agree	Any improvement to transportation at Logan airport needs to involve rail, please look into this.
14	Ground Transportation	Cole Lewis	Boston	TransitMatters	Neither agree nor disagree	<p>TransitMatters commends Massport for establishing sustainability, passenger experience, and reducing congestion as organizational priorities through its aims to reduce private vehicle trips to Logan Airport over the next 10 years. As the draft strategic plan outlines, the curbs at Logan's terminals are already sensitive to severe and frustrating congestion. Massport is right to recognize the need for modernized ground transportation options at Logan, as the airport will only grow in passenger demand over the next decade. To achieve this, Massport must get more ambitious and specific about its plans to increase the use of high occupancy modes, specifically the MBTA Blue Line. The Blue Line's connection to Logan Airport is a great asset to the Boston area, but its potential is largely untapped because of low ridership. The rapid transit option is underutilized because shuttle connections between the station and terminals are unreliable, confusing, and more laborious than taking a private vehicle. As reported by Massport, only 2% of passengers use the Blue Line to get to the airport because of reliability and ease-of-use issues. What Massport needs is a firm plan to make getting to and from the airport using the Blue Line a reality.</p> <p>In this strategic plan, Massport must commit to addressing the following shortfalls of its on-airport shuttle system:</p> <ol style="list-style-type: none"> <li>1. Reliability: The Blue Line is so under-utilized as a means of reaching the airport because travelers and airport employees cannot afford such variability in travel time. Because shuttles are often bunched, passengers do not know if they will have to wait 1 minute or 8 minutes for a shuttle to arrive. Once they do get on a shuttle, riders are in the dark as to whether their bus will dwell for an inexplicably long amount of time at any stop along the way.</li> <li>2. Frequency: Shuttle riders report feeling like they spend too much time at the curb, waiting for a bus. Whether Boston is experiencing extreme heat or extreme cold, the Blue Line will not be a realistic option for riders if they have to wait longer than they deem worth it.</li> <li>3. Legibility: As it exists today, the on-airport shuttle system is confusing for most riders that don't use it habitually. The six different on-airport routes – plus routes that go off-airport – are difficult to understand for the average user. Travelers also have issues finding where their shuttle stop is located because of a lack of signage and maps. Without consistent onboard announcements, riders also report having trouble knowing what stop the bus is arriving at.</li> <li>4. Curb Access: Bunching and curbs overloaded with dwelling shuttles causes many Massport buses to have to let off passengers far from the curb. This creates accessibility issues and makes the bus even more uncomfortable for passengers of all ages who may have to unload luggage down a steep drop and then walk to the curb.</li> <li>5. Bus Speed: Massport's on-airport shuttles are driven at much slower speeds than similarly-designed buses driven by other operators. This makes for longer travel times and a frustrating rider experience, reducing the likelihood that employees and travelers will use the Blue Line and shuttles.</li> </ol> <p>Improving shuttle connectivity to and from the Blue Line is one of the most pressing needs for Logan Airport if Massport would like to accomplish its goals for better customer experience, reduced congestion, and decarbonization. The World Cup this summer provides additional incentive to make Logan more accessible by Blue Line – to meet the influx of international travelers it will bring and to satisfy the expectation of a higher level of rapid transit connectivity that many will have. The next decade of Massport's leadership must be one in which the Blue Line becomes a legitimate part of Logan Airport's ground access plan.</p>
15	Ground Transportation	Dan R	Brookline		Agree	There's no effective plan to improve the quality and speed of the public transit connections that serve Logan Airport. An automated people mover is badly needed to directly connect the Logan Airport Terminals with the Airport Blue Line station and the strategic plan needs to include either a full plan for this or lay the groundwork for it. In the short term Massport needs to improve the shuttle system to remove the RCC from the majority of routes, improve bus priority through signal and lane priority and to improve Silver Line service through the same transit priority means.
16	Ground Transportation	Corinne T	Quincy		Disagree	<p>I urge MassPORT to take stronger, clearer action to reduce congestion, improve climate outcomes, and expand equitable access to Logan Airport by prioritizing transit investments over car-dependent and luxury aviation expansion.</p> <p>First, MassPORT should develop and publish a clear, enforceable plan for dedicated bus lanes at Logan Airport, specifically for the Silver Line and airport shuttle buses. Reliable, congestion-free bus access is essential for workers, residents, and travelers, and dedicated lanes would significantly improve travel times and service reliability.</p> <p>Second, MassPORT should financially support the Red-Blue Connector in partnership with the MBTA. This long-discussed project is critical to providing faster, more direct transit service to Logan and would meaningfully reduce automobile trips to the airport while improving regional connectivity.</p> <p>Third, MassPORT should restart and advance plans for an automated people mover connecting the Logan terminals, the rental car facility, and the MBTA Blue Line Airport station. An automated people mover would modernize airport access, reduce shuttle bus congestion, and align Logan with best practices at major international airports.</p> <p>Finally, I strongly oppose any expansion of private jet operations at Hanscom Field. Expanding private aviation would increase noise, emissions, and inequitable use of public resources while undermining regional climate and transportation goals.</p> <p>MassPORT has an opportunity to lead by investing in high-capacity, sustainable transportation that benefits workers, residents, and the region as a whole. I encourage you to prioritize these transit-forward solutions.</p>
17	Ground Transportation	Robert K	Quincy		Disagree	I do not think the strategic plan is bold enough or goes far enough. I use Logan at least 3 times a year. To support a robust airport for travelers, residents, and visitors, MassPORT needs to be bolder in its plans. MassPORT needs to more clearly plan for dedicated bus lanes at Logan Airport for Silver Line and Shuttle Buses. MassPORT must also financially support the Red-Blue Connector with the MBTA to get more service to Logan Airport. Blue Line is much better than the Silver Line as it doesn't get stuck in traffic and also connects closer to Cambridge. Additionally, MassPORT should restart plans for an automated people mover at the Logan Airport Terminals, rental car facility, and MBTA Blue Line Airport stop. Many modern Airports have this, which I have visited from DFW, ATL, SFO, and OAK. Even LAX is building one.
18	Ground Transportation	Daniel C	Somerville		Neither agree nor disagree	Reducing traffic to and from the airport needs to be a priority. There needs to be a better way for those using the the T to get to the terminals rather than be stuck in traffic. A walkway from the Blue line stop. I'd rather walk from the Blue Line instead of deal with cramped shuttle and get carsick. Protected lanes for Silver line, bus route and Logan Express. Or a bus tunnel or something.
19	Ground Transportation	Jake H	Somerville		Agree	Please add more on plans to improve ground transportation at Logan, in particular reducing congestion and making transit more accessible to travelers. One key consideration should be an automated people mover to make it easier for travelers to get to and from the airport blue line station.
20	Ground Transportation, APM	Connor B	Boston, East		Agree	An automated people mover connecting all terminals (land side), the blue line station & rental car center should be explored to replace the shuttle buses, which do not arrive as consistently and have to wait in traffic and at traffic lights. There should also be a push to expand MBTA blue line service to allow employees and passengers to utilize it for early departures. Service begins too late for these early-morning needs. If it's infeasible to expand service hours, then a dedicated 24 hr bus should exist to allow people to travel from downtown to East Boston and Logan.
21	Ground Transportation, APM	Benjamin F	Boston		Agree	Seeing no direct planning for an APM is disappointing, the shuttle system is inconsistent, confusing, and frustrating. Massport should consider a direct link to the blue line via rail.

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22 Ground Transportation, APM	Binh M	Boston		Agree	Please improve public transit to Logan Airport, especially from connections with the MBTA from the Blue Line. Bus shuttles are slow and almost always stop at the car rental facility for a few minutes, making the travel to the airport terminals long. There is a shuttle that skips the rental facilities, but it often is full, and is slow anyway due to airport traffic. Furthermore, buses can get very cramped with all the luggage, despite luggage racks being available. I believe that alternatives to bus shuttles should be looked into, such as an airport people mover. Currently, transit makes up a very small percentage of people traveling to the airport, and that is due to the very inconvenient and confusing travel that needs to be taken from the Blue line to the airport terminal via shuttles. Investing in an Airport People Mover, like in the previously considered APM project, could alleviate the confusion at the pick-up/drop-off locations between Blue Line and terminals, decrease travel times, while also increasing ridership and creating a mode shift onto higher occupancy/transit modes, which is a goal in the current strategic plan. Failing to consider such high capacity APM is short-sighted, especially when Logan International Airport is poised to have a significant increase in ridership over the upcoming years. Building significant public infrastructure now would be cheaper than building it later on down the line, and would allow Boston Logan Airport to have public transportation access that is on par, and maybe even better, than other international airports across the world.
23 Ground Transportation, APM	Jorden V	Boston		Neither agree nor disagree	Logan needs a high-quality and high-capacity people mover system between the economy garage, Blue Line station, rental car center, and terminals to alleviate ground congestion and to give a better customer experience to folks traveling between these nodes of the airport. Current shuttle system between these points is slow, inefficient, and unpredictable. This slow and inefficient system drives mode share from/to the urban core away from transit and to rideshare/taxis.  Centralizing bus dropoff/pickoff should be evaluated to speed up transit trips to/from the airport.  Separate bus lanes and boarding islands for each service (local shuttle, silver line, logan express, other) should be created at each terminal. Current curb system is madness and is unpredictable - this leaves a bad impression on visitors seeing Boston/Massachusetts for the first time.
24 Ground Transportation, APM	Samsudeen S	Boston		Agree	Please make the automated people mover into a priority again. Or at least a plan for it. It will revolutionize access to the blue line and between terminals and do a significant amount to lessen the environmental impact from travelers. The busses are extremely unreliable, slow, and the main barrier for many people to taking the T to the airport.
25 Ground Transportation, APM	Tim C	Boston		Strongly agree	There needs to be more work to improve public transportation access to Logan. The current options take way too long. What about connecting the blue line to the terminals using an automated people mover system? I know I would take the Blue Line from downtown instead of an Uber if the time from Blue Line stop to Terminal A was <5 minutes.
26 Ground Transportation, APM	Theo R	Cambridge		Neither agree nor disagree	The plan is noncommittal with regards to ground transportation at Logan — a clear long term position regarding connecting the terminals (including the people-mover connecting the terminals, garage, and blue line considered pre-covid) would be welcomed
27 Ground Transportation, APM	Gregg G	Cambridge, MA		Agree	Regarding Logan connections: can we please build an automated people mover that connects the terminals with the Blue Line Airport station and the Rental Car facility to take away some of the roadway congestion? Thank you!
28 Ground Transportation, APM	John O	Cambridge, MA		Agree	A significant portion of the Logan airport section of the plan is devoted to reducing ground-side congestion, but the plan shies away from identifying the most obvious and effective solution for alleviating this connection - and automated people mover. Investment in APM technology would not only relieve congestion for passengers, but could provide continuous service for Logan airport and airline employees as well, without requiring additional overhead and labor costs of running other HOV modes such as the existing shuttle buses. Pre-pandemic, a people mover was included in the Massport long range plan, and I urge you to consider its adoption once again.
29 Ground Transportation, APM	Eric L	Quincy		Agree	I strongly believe a people mover (i.e monorail, airtrain, etc) direct to the terminals would be a huge gain to Logan airport. It will help alleviate and reduce congestion from single occupancy vehicles. Having this part of the strategic plan is important to plan for increased demand to Logan in the next decade.
30 Ground Transportation, APM	Matthew D	Quincy		Neither agree nor disagree	Please build a peoplemover for Boston Logan Airport, or at absolute worst, give the bus a dedicated lane.
31 Ground Transportation, APM	Mark M	Somerville		Neither agree nor disagree	I was very disappointed to not see any planning around a better people movement plan (APM, BRT with dedicated roadway, etc).
32 Ground Transportation, APM	Tom E	Somerville		Neither agree nor disagree	Much more needs to be done to provide transit connectivity to the airport. Massport continues to spend hundreds of millions of dollars to expand parking capacity when there is a clear traffic congestion issue at the airport. The shuttle bus system from the Blue Line gets stuck in traffic, causing unpredictable travel times and punishing transit riders with the traffic they are trying to avoid. The automated people mover should be invested in immediately to ensure seamless transit connection to the airport.  MassPort should work with the T to evaluate if the APM can complement past plans for an Urban Ring, connecting beyond the Blue line, following the SL3 route to Sullivan and crossing the harbor to Silver Line Way and South Station. MassPort should be much more ambitious to getting cars off the road instead of focusing on parking revenue.
33 Ground Transportation, APM	Todd P	Somerville		Neither agree nor disagree	Prioritize a People Moover! The shuttles are terrible, especially for T users. Logan needs a people mover connecting all terminals, the blue line T, rental cars and economy parking.
34 Ground Transportation, APM	Bryan G	Watertown,MA		Agree	For Logan please include the automated people mover! It would help make it much easier for whenever I fly to take public transportation. Having an airport so close to the city, but such a hassle to use public transportation is a huge letdown.
35 Ground Transportation, Customer Experience	Patrick W	Boston		Agree	The Terminal E expansion is fantastic. I'm curious how the number of passengers is increasing despite operations decreasing — it seems more and more airlines are using smaller craft, such as A320 instead of A330/787 on Western Europe routes and the A220 over A320/737 on domestic routes. While I'm sure Massport has little control over this, it does not make for pleasant flying and if passenger numbers can sustain widebodies, it seems we ought to encourage their use, even if it means fewer operations. Still a major embarrassment that Logan has no rail connection to downtown that doesn't involve waiting curbside in the cold for a stinking, lurching bus. I can't imagine what people from legitimate 1st world places who visit think of this garbage. How much extra tax would it cost for a transit system that doesn't feel hostile to use? Sign me up. How have every other country in the world along with more car-centric US cities like Dallas and Miami figured this out? Pathetic. Though I guess your position might be "what's the use"... even if you got it built, you're still dumping pax off with the MBTA, who can't even afford to power wash their stations...

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36 Ground Transportation, Customer Experience	James M	Gardner	freelance	Disagree	<p>Any long winded document full of Dolphin-speak pandering to committees, boards, stake holders and every other management group known to man will never clearly communicate. It's not designed to.</p> <p>How can you be taken seriously when the online .pdf only displays even numbered pages? It took 3 attempts to load the document before finally downloading and saving to be able to read all the pages. Rather apt. I refer to Logan as 'A taste of the 3rd World right at home.'</p> <p>I fly between 6 and 15 times a year, for business, am a United Gold if not Platinum member with United Club access. Logan is not my first choice. It's my only choice, living west of Rt 495, an area unknown to Massport board members and highly paid executives. Yes, we exist, are not hicks and have careers that occasionally require travel.</p> <p>In the past couple years alone I've flown to varied places such as Sao Paulo, Mexico City, Meford Oregon, Lisbon, and Columbus Ohio, not to mention domestic hubs such as O'Hare, Newark, and SFO. The only place the approaches the feeling of dread that Logan brings is LAX, which is a special level of hell.</p> <p>I have flown to Florida for work 5 times in the past 14 months and have dismissed Worcester every time despite non-stop flights, parking being all but free and me able to be at the gate 30 minutes from leaving my driveway. Jet Blue is too unreliable for business travel and the airport's weather on top of the hill compounds the unreliability.</p> <p>I understand Logan's geographic limitations. I live it. Driving to and from Logan is a nightmare, traffic patterns changing so often the Etch a Sketch they were drawn on can't keep up. I understand the 'bottle necks' when I go to pick up my son who travels home from the military, usually during the highest volume travel days. Nothing says 'Welcome to Boston" more than State Troopers sentenced to Troop F screaming at you to park in a specific place only to have a different trooper stomp over and tell you to move. When you tell him that's where the other trooper told you to stop he screams again while your son is trying to cross 2 or 3 lanes of traffic for a 5 second pickup.</p> <p>It's a pipe dream to think at least 2 large, high priced agencies (MassPort and the MBTA) along with the City of Boston and the state would work together for the benefit of taxpayers and visitors alike to make their lives easier without lining the pockets of the Board members and politicians alike. I never expect to be able to take the commuter rail to Logan. A city that truly cared would have a high speed rail link between South Station, every terminal, rentals and North Station. Imagine that (with a roll of the eyes).</p> <p>You can try and explain away your limited footprint all you want, but your parking fees are an insult to anyone who's working class. You would think for the price you charge for Terminal B Parking (almost enough to charter a jet from a different airport) you could at least maintain the elevators. I always feel as though I'm taking my life in my hands stepping into them.</p> <p>On my most recent flight, 4 days after a major snowstorm with another big storm possible, (this is only January with another full month of winter to come) there were still large berms of snow INSIDE the Terminal B garage. INSIDE! They were big enough that some cars snowed in may be damaged trying to leave. These berms would be quite easy to remove with a simple snowblower. On my return home, the snow was still there, now 8 days after the storm. And the access roads may be clear, but the snow is still on the sides, squeezing the limited footprint even more. It's embarrassing and amateur.</p> <p>In the end if I could fly out of somewhere else I would. But I can't. I'm not concerned with feeling valued or important. When I think of Logan I don't want to feel anything (especially contempt). I just want to accomplish getting in and out efficiently. I'm tired of feeling as if I'm being done a favor by being allowed onto airport property.</p>
37 Ground Transportation, MBTA access	Nathan W	Cambridge		Agree	I would like to highlight the importance of MassPort encouraging the use of public transportation to reach Logan Airport. This is highlighted in the report but is sparse on details. Concrete actions such as a people mover to the Blue Line, a dedicated bus lane in the Ted Williams Tunnel, and the permanent usage of the so-called "State Police Ramp" for the SL1 and SL3, a ramp which was in fact built for the Silver Line and not the State Police. MassPort should also support and encourage the State Legislature and MBTA to build the Red-Blue Connector, allowing direction connections from the Blue Line reaching Logan to Red Line destinations such as Cambridge, Somerville, Dorchester, and much of the South Shore.
38 Ground Transportation, Pedestrian Access	Geoff G	Boston, East	Resident	Agree	<p>I appreciate the transparency of you all creating and publicly sharing a 10 year plan. I'm excited by many of the proposals as an East Boston resident that lives less than a mile from Logan Airport. I wanted to share a few of my additional thoughts and aspirations that could transform the future:</p> <ol style="list-style-type: none"> <li>1) Improve Rideshare Pick-up and drop-off experience: This is a mouse maze right now. The signage in the airport is good, but the number of multiple elevators, escalators, and steps required to get to the uber/lyft area is clearly a patchwork design. Standing outside in the cold parking lot surrounded by idling car gas exhaust is also a poor experience. I understand the idea of centralizing rideshares, but I hope the long-term plan makes a serious effort to streamline the transit path, in particular reduce the multiple ups and downs.</li> <li>2) Revamp MBTA to Logan to be a direct connection. I don't have an answer for the design and this is a bigger dream, but the current system of the blue airport T station to shuttle busses to airport terminals is inefficient and a major detractor to using public transit. Having a system more similar to Denver airport or others that have a direct airport to public transit connection will significantly reduce the car footprint and increase the T as a primary transit mode for travelers within Boston.</li> <li>3) Optimize Marginal St. Pedestrian Experience (Piers Park 1 &amp; 2, Boston Shipyard): As an East Boston resident this is a more local wishlist item, but something I'm passionate about and think has tremendous opportunity. For many pee living in East Boston (including me), the primary mode to get to the airport is actually by walking along Marginal St. This is unique and maybe the only airport in the country where walking is a genuine option! The pathway is beautiful along the harbor and parkway, and today it is actually faster on average for people downtown Boston to get off at Maverick MBTA stop and walk to the airport than to stay on to Airport MBTA Stop and take a bus shuttle (see #2). I think MassPort can make this pedestrian pathway a truly novel EXPERIENCE for travelers across the city and world by investing in more art murals, beautified airport wall/sidewalk by Terminal A, improved shipyard walking paths, the shipyard container village and local shopping area proposal, and new pedestrian walking path signage. Imagine an art harborwalk that travelers go out of their way to visit by stepping out of the airport and immediately being immersed in urban art, shopping and restaurants (shipyard container village, downeast, etc) the city skyline, and beautiful harbor and park nature paths along Marginal St. as they walk to East Boston, Maverick Station, or Ferry Terminals. No other airport in the country can offer that, it would be a unique attraction and airport identity to show off the city and New England as a whole.</li> </ol> <p>I'd love to be involved or support any discussions in follow-up.</p>
39 Hanscom Field	JOHN S	BEDFORD		Strongly agree	I SUPPORT MASSPORT STRATEGY PLAN FOR NEXT 10 YEARS AT HANSCOM FIELD AIRPORT .
40 Hanscom Field	Neil Rasmussen	Concord	Save our Heritage		Support innovation hub designation for Hanscom. Plan doesn't address private jet growth and emissions impacts. Apposed to SAF, not avialble and not sustainable. Revise the plan to reflect reality of jet growth and emmissions with a comperhensive envrionmental accounting.
41 Hanscom Field	Anabel G	Lexington		Neither agree nor disagree	Would like to see more details; particularly concerning Hanscom Field in Bedford and the very, very poor plans to expand the runways to allow bigger planes to land. It's a terrible idea; Hanscom is the right size for its location.

Topics	Full Name	City/Town	Your Organization	Does the strategic plan document clearly communicate Massport's priorities in the next ten years?	Please provide any additional written commentary here. Thank you for your feedback.
42 Hanscom Field, Private Jet Expansion, Growth, SAF	Margaret Coppe	Lexington	Hanscom Field Advisory Commission	Agree	<p>1. Defining Massport's mission, vision and strategic objectives (slide 6) The overall mission of Massport is stated as "Connecting MA to the world and moving the region forward." A mission statement is necessarily vague, but the idea of "moving forward" is particularly vulnerable to different interpretations. We believe any progress cannot be just economic progress but also the need for stronger progress in the environmental and human rights concerns raised by HFAC and community members.</p> <p>2. Guiding Principles-Ambitious (slide 8) We hope the ambition and sensitivity to trends can be directed towards research and development that is realistic and that rejects the twentieth century notion that all growth is good. In defining Massport's ambition, we think you should look not just at the activities for which you have 100% responsibility but also look for ways to help facility users do better.</p> <p>3. Guiding Principles-Collaborative (slide 8). We appreciate the commitment to engaging external stakeholders and considering the needs of surrounding communities. We recognize and appreciate that Massport representatives attend and attempt to answer questions from the community during HFAC meetings. We would like to see in the next phase of the strategic plan specific initiatives that go beyond "just listening" to the community to making actual progress in addressing our concerns.</p> <p>4. Massport Strategic Plan objective: "Plan for managing growth and economic impact." HFAC rejects the assumption that growth is necessary or desirable. Certainly, from the perspective of the community, any increase in operations will be tied to more noise, pollution, and global greenhouse gases.</p> <p>5. Aspirational slogans: (slide 18). "Being a good neighbor is our responsibility." There are opportunities to make this more concrete. HFAC members and citizen participants in our calls are particularly concerned by the use of Hanscom Field by the Department of Homeland Security to move immigrants around, some of whose legal status has not been carefully ascertained. Massport can do better by aiming to be transparent about the operations occurring there and demanding accurate information from federal agencies using the field.</p> <p>6. Hanscom Strategic Priority Areas-SAF (slide 16) One of the strategic priorities is to support the development &amp; adoption of sustainable aviation fuel while advancing Massport's net-zero goals. HFAC members care deeply about the goal of advancing towards net-zero but believe the science proving the viability of SAF as a way to address climate change is not there (in the near term). Doing more research is fine but it should not be the centerpiece of any serious strategic plan towards less impactful aviation.</p> <p>7. Observations: Hanscom: (slide 12). HFAC has repeatedly complained to Massport about the use of the term "business jets." This usage implicitly suggests that these jets are a necessary part of promoting the success of regional business. In fact, we can see that a significant number of trips made by these jets are to vacation spots like Jackson Hole and Nantucket. We would like to see Massport adopt the more neutral term "private jet" as an acknowledgement that private jets like commercial jets are used by people for many purposes.</p> <p>8. Economic Impact: (slide 4). Can you confirm that the \$22 billion and 107,000 direct jobs associated with Massport facilities do not include activity associated with Hanscom Airforce base? In some Massport presentations, contributions from the AFB have been mistakenly included in estimating economic impact.</p> <p>9. Stakeholder perspective: We think the plan would be improved by defining who your stakeholders are. This would include customers who use the services offered at Massport facilities, but also a constellation of other groups and individuals—employees, vendors providing services, and so on. Because these stakeholders may have different priorities than the communities HFAC represents (also stakeholders), identifying who they are and what the challenges might be in reconciling their priorities would be helpful in interpreting Massport's mission, vision, and strategic objectives</p> <p>10. For future inclusion in strategic initiatives: We hope in the next phase of the strategic plan, Massport will include:</p> <p>a. Initiatives to continue to improve public transportation to and from Massport facilities (including Hanscom)</p> <p>b. Initiatives to encourage the growth of electric aviation as opportunities arise as alternatives for some short-hop flights</p>
43 Hanscom Field, Private Jet Expansion, Growth, SAF	Anne Buxton Sobol	Lincoln	Stop Private Jet Expansion at Hanscom or Anywhere, Mothers Out Front	Neither agree nor disagree	<p>Anne Buxton Sobol Comment on Massport Strategic Plan 2025</p> <p>My comment focuses on the portion of the draft Massport Strategic Plan 2025 pertaining to Hanscom Field. Massport's strategic plan for Hanscom is to build out dramatically the infrastructure for luxury private jets. If it happens, this will lead to more private jet flights carrying wealthy people to vacation destinations. This does not advance the public good. On the contrary, the increase in greenhouse gas emissions associated with increased jet traffic threatens us all. Massport says it is creating a "hub" for sustainable aviation fuel, but a reading of the Massachusetts and New England Sustainable Aviation Fuel Study commissioned by Massport provides little assurance that SAF capable of substantially reducing emissions will be available any time soon, if ever. Or any assurance that wealthy jet owners will pay the higher price of SAF. The strategic plan says little about the climate threats to Massport's major Boston assets, Logan Airport and waterfront real estate. But the increase in emissions associated with expansion of jet flights from Hanscom and their contribution to our changing climate increasingly threaten Massport's core assets.</p> <p>Lincoln, Massachusetts, March 6, 2026</p>
44 Hanscom Field, SAF and Growth	Chris Eliot	Hanscom			<p>Submitted Written Comment Letter. The comment letter focuses on Sustainable Aviation Fuels (SAF) and provides a detail explanation as to why Mr. Eliot believes SAF is not sustainable and scalable. The letter also goes into detail about the various techniques and feedstocks related to SAF and provides his perspective on greenhouse gas reduction and scalability challenges.</p>
45 Hanscom Field	Angela M	Carlisle	responding as a neighbor	Agree	<p>Although the plan talks about your goals for the future, I feel it needs more specific goals especially relating to the impact that Hanscom Field has on the surrounding towns.</p> <p>Hanscom Field has significant environmental and community impacts primarily driven by a high volume of corporate and private jet traffic. Concerns focus on greenhouse gas emissions, air quality, noise pollution, and the ecological impact of a proposed expansion in Bedford, Concord, Lexington, Lincoln, and other surrounding towns such as Carlisle.</p> <p>Environmental Impacts on the Environment and Surroundings</p> <p>Air Pollution &amp; Health Risks: Studies have shown that communities surrounding the airport experience elevated levels of black carbon, ultrafine particulate matter, and polycyclic aromatic hydrocarbons. These pollutants are linked to health issues including decreased lung function, oxidative DNA damage, and increased cancer risk.</p> <p>Climate Change &amp; Carbon Emissions: Private jets at Hanscom are highly inefficient, with many flights (roughly 41%) lasting less than an hour. A study found that over an 18-month period, these jets emitted over 106,000 tons of carbon, and proposed expansions could add 6,000 more flights annually.</p> <p>Contamination &amp; Runoff: The area is a Superfund site due to historical military contamination, including groundwater and soil polluted with jet fuel, solvents, and petroleum compounds. Increased paving for, new hangar construction threatens to worsen stormwater runoff and create "heat island" effects.</p> <p>Impact on Biodiversity: The area is home to endangered species, such as the grasshopper sparrow and upland sandpiper, which are threatened by habitat loss and increased activity.</p> <p>Impact on Surrounding Towns</p> <p>Noise Pollution: Residents in surrounding towns, particularly in Concord, Bedford, and Lincoln, report significant noise pollution from frequent, low-altitude flights of private jets.</p> <p>Infrastructure and Quality of Life: The proposed North Airfield project involves massive new construction—including 27 new hangars—which threatens to destroy local wooded areas and increase traffic congestion along roads like Hartwell Road.</p> <p>Private jets operating out of Hanscom Field generate significant environmental impacts, with roughly 38,100 annual operations emitting over 100,000 tons of CO<sub>2</sub> in 18 months, according to studies. These flights, many of which are short-hop luxury trips, produce significantly higher per-passenger emissions than commercial aviation. Proposed expansion plans are heavily contested due to concerns that increased capacity could severely undermine local climate goals.</p> <p>Key Environmental Impacts:</p> <p>Carbon Emissions: An 18-month analysis by the Institute for Policy Studies found Hanscom private jets generated approximately 106,676 tons of CO<sub>2</sub>.</p> <p>High-Polluting Short Flights: Roughly 41% of departures are under one hour, which is inefficient as planes consume the most fuel during takeoff.</p> <p>Comparison to Local Efforts: The emissions from Hanscom's private jet activity threaten to negate the majority of climate benefits from all solar PV installations in towns like Concord.</p>
46 Hanscom Field	Ro C	Carlisle	None	Strongly agree	Support growth at Hanscom Field.

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47	Hascom Field, ICE	Senator Cynthia Stone Creem		State Senate / Commonwealth of MA	Submitted Written Comment Letter - Value workforce immigrants.	
48	ICE/Immigration	Juan M	Boston	Agree	<p>I am writing as a Massachusetts resident and frequent Massport passenger. I am deeply concerned about how current immigration enforcement actions intersect with Massport's operations and affect our communities, workforce, and regional economy.</p> <p>I appreciate the ambitious goals laid out in the 2026 Massport Strategic Plan, especially the emphasis on people, safety and security, being an employer of choice, and maintaining a strong community focus. However, I believe the plan must more clearly recognize the essential role that immigrants, international students, and international innovators play in achieving Massport's vision.</p> <p>I urge you to</p> <ol style="list-style-type: none"> <li>Explicitly recognize Massachusetts' immigrant and international student populations as key contributors to Massport's economic, innovation, and workforce goals, and to commit to protecting their safety and due process.</li> <li>Affirm and enforce Hanscom Field's status as a general aviation airport, clearly and decisively separating its operations from deportation activities, and publicly clarifying Massport's role and policies regarding ICE.</li> <li>Strengthen protections and career pathways for immigrant workers at Massport by committing to defend employees' lawful rights (including asylum seekers) and by explicitly including immigrants in Massport's training, upskilling, and hiring strategies.</li> <li>Improve transparency and community engagement by publicly disclosing Massport's policies and agreements related to immigration enforcement, and by meeting with community groups to discuss how to align practice with the Strategic Plan's stated values.</li> </ol> <p>These changes would help ensure that the Strategic Plan's aspirational language becomes a reality, and that Massport's operations genuinely reflect its commitments to safety, inclusion, economic strength, and being a good neighbor.</p>	
49	ICE/Immigration	Deborah P-J	Brookline	Activist Evenings Brookline	Agree	<p>We appreciate the aspirational language of the Massport Strategic Plan and applaud the great strides made as well as the clear future vision. The plan rightly notes the importance of our state being home to many US preeminent colleges and research universities. We see our colleges and research universities as integral to the success of the strategic plan and our report sent in full to the address provided offers specific ways to leverage partnerships with these institutions. The Massport Strategic Plan also notes the need to address potential labor shortages. Again, our detailed feedback offers specific ways our immigrant population can align with Massport to address labor shortages.</p> <p>We recommend Massport's strategic plan include specific language that frames Massachusetts large immigrant population as making significant economic and social contributions to the goals as outlined in the plan. For example, when talking about the innovation hubs, the plan needs to talk about how those hubs are associated with our research universities and often rely on the fresh ideas from international innovators.</p> <p>We urge Massport to make the aspirational goals a reality by ensuring the safety and security of our immigrant neighbors, by providing a welcoming environment to our international students and innovators and transparently transforming Hanscom into the general aviation hub that provides safe partnerships with nearby innovation hubs.</p> <p>The plan needs to add language that will ensure these aspirational goals will be a reality.</p>
50	ICE/Immigration	Veronika W	Brookline	Citizen of Brookline	Agree	<p>How can Massport be an employer of choice if it does not recognize and protect the rights of those who are lawfully in the country? How can MassPort be a good neighbor when is it supporting unlawful deportations where individuals are not given due process? I do encourage MassPort to publicly reject cooperating with the federal government carrying out activities that are against the very fundamental rights of every person in this country. MassPort should exercise greater transparency towards its citizens by regularly and publicly reporting the extent of the cooperation with the Department of Homeland Security.</p>
51	ICE/Immigration	Carolyn M	Waltham		Strongly agree	<p>Hello, MassPort's Strategic Plan is extremely problematic as it prioritizes the needs of an increasingly-authoritarian federal regime over the needs of Massachusetts residents. Prioritizing the immediate needs of Immigration &amp; Customs Enforcement (ICE), which has evolved into a domestic terrorist organization, does not meet the needs of Massachusetts residents, businesses, and our environment. MassPort is an important gatekeeper in protecting the needs of Massachusetts residents, businesses, and our environment, and in upholding Massachusetts law, moral and ethical codes. You have failed us as evidenced by prioritizing the demands of a domestic terrorist organization. Please immediately hold virtual and in-person meetings available to all Massachusetts residents at various days/times so we can all participate in shaping a welcoming MassPort strategic plan together.</p> <p>Sincerely, Carolyn Melbye US Citizen and Massachusetts Resident (though that shouldn't matter, we are all humans trying to thrive together in shared community)</p>
52	Infrastructure Investment, Passenger Experience	Carsten J	Weston		Strongly agree	<p>Some detailed suggestions:</p> <ol style="list-style-type: none"> <li>Public transit access should be a key priority, both at Logan and at Worcester. This would significantly reduce congestion.</li> <li>Strongly consider common-use gates (gates not reserved exclusively to one airline, which are much more common in other countries) at Logan and at Worcester. This would increase operational efficiency and make it much easier for new airlines to enter, thus promoting competition in the airline industry. This will help avoid the need to unnecessarily send domestic flights to international-capable gates. This will also help get ahead of legislative efforts (e.g. the Airport Gate Competition Act which was proposed in Congress in 2024) to require common-use gates.</li> <li>Implement the "One Stop Security" program for passengers connecting from international arrivals from TSA-approved countries (currently only the UK, but likely to expand to other countries), to the greatest extent permitted by the federal government. (While the program currently focuses on international arrivals connecting to another flight, it could, in theory, allow international flights from the approved countries to arrive in a domestic terminal, freeing up international-capable gates - for instance, a few of the gates in Terminal A have long hallways that could be used for passport control for these arrivals.) Also consider adding full international arrival facilities to terminals other than Terminal E - wasn't there a proposal way back in the 1990's/2000's to add international arrival facilities to Terminal B that never came to fruition?</li> <li>Add additional non-aviation tenants (think outside the box, e.g. an entertainment center or a shopping mall like Singapore's Jewel Changi) that can be used both by the general public and by passengers on a long layover. This could provide a major revenue stream that would be beneficial, especially amidst continuing uncertainty over federal funding in the current (or any future) federal administration. (If the idea of non-aviation tenants causes concerns over luggage theft, see item 5 which would mitigate this concern.)</li> <li>In new/reimagined terminals, consider separating domestic baggage claim from the public area with a one-way door that allows passengers to leave freely but not to enter the baggage claim from the public area, similar to what's done in international baggage claim just without customs (and some other countries like the UK have separated domestic baggage claim from the public area). Separating baggage claim from the public area has numerous security benefits. The historic tradition in the US of domestic baggage claim in the public area predates many modern-day security considerations.</li> </ol>
53	Infrastructure Investment, Terminal C and ATCT	Miles V	Carlisle, MA		Disagree	<p>It would have been good if Massport had highlighted more about what they intend to do at Logan, such as providing options about how to redevelop Terminal C, and drafting images of a potential new control tower.</p>
54	Infrastructure Investment, Terminal Connectivity	Matthew B	Cohasset, MA		Agree	<p>I fly a lot for work and I really like Boston Logan. When compared to other comparable East Coast airports (PHL in particular), the airport has a better feel and operates more consistently (despite one of the most challenging runway configurations in the world). I love the idea of modernizing the terminals but would also love to see a way to connect terminal A to the rest of the airport post security. I think the ability to go from B to C to E was one of the best improvements. The increase in operations by Delta has also been a huge benefit. However, I do feel Delta will quickly reach a ceiling on what service they can provide. Not sure if it would be possible to expand terminal A into the Cargo area Fed Ex currently uses. This would allow Delta to have more wide-body gates closer to their domestic operations. I really think Delta continuing to grow and compete with JetBlue will have an huge benefit to the region.</p>
55	Infrastructure Investments, 2014 SP,accountability	Aaron W	millville	Self	Agree	<p>I'd be interested to see a breakdown of infrastructure/critical assets that will require replacement over the next 10 years and what % of the total that is. I'd also be interested in seeing an accountability with the items that weren't accomplished in the 2014 plan. Only if the misses were less impactful or weighty, otherwise the misses would be a distraction and an eye roll. A more useful or impactful way to state 2014 would be the value realized not the action accomplished - for example "Flynn Cruise port Build demand" doesnt tell the reader anything of value aside from Massports own check mark on accomplished - what was the % increase, any key partnerships signed, any other metric to be cited. Several other listed achievements offer minimum insight into the impact of success.</p>

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56 Infrastructure Investments, maintenance	Betsy T	Needham	Massport Employee Retirement System	Agree	<p>According to its enabling act, Massport's purpose is to construct, operate and maintain transportation infrastructure. While the Strategic Plan addresses the concerns of its stakeholders, the economy and the technological challenges facing Massport, the document omits discussion of the importance of safety and the role of maintenance. As a transportation entity, safety must be Massport's highest priority; this need to be clearly articulated. Similarly, long term maintenance matters. As a former chair of the MBTA Board and as the former Director of Finance &amp; Treasury at the Authority, I am keenly aware of what happens if maintenance is ignored.</p> <p>I support the value of coordination with other state agencies. Having said that, those agencies have less money and less financial flexibility than Massport. Historically they have looked to MPA for support. This situation continues to pose a risk to Massport that is not alluded to in the Strategic Plan.</p> <p>Finally, the list of priorities as stated does not provide a guide for the allocation of capital among the competing facilities and priorities. Clearly such a ranking of priorities is essential to the successful implementation of the Strategic Plan.</p>
57 Logan, Noise and Emissions	Helen S	Boston, East	None	Strongly disagree	What have you done to reduce noise and air pollution-NOTHING, stop selling Eastie to people like the Tall Ship, its nothing but more noise, crime and problems
58 Logan, Noise from Runway 27	Mary M	Boston, South	Andrew Square Civic Association	Agree	<p>As representatives of the Andrew Square Civic Association, we appreciate the opportunity to participate in the public comment portion of Massport's 2025 Strategic Plan. The issue we would like to highlight is the change in the Runway 27 flight path from Logan International Airport, the detrimental impact this flight path change has had on Andrew Square residents and steps we recommend that Massport should take to rectify the situation.</p> <p>Without following required public process, the Federal Aviation Administration (FAA) has changed the initial departure turn for aircraft from Runway 27 to fly over South Boston. Starting as early as 5 a.m., jets and airplanes fly straight over the Andrew Square community. The noise is deafening, and it is disrupting the sleep and adversely affecting the mental health of many who live in our neighborhood. A long-term lack of sleep creates health concerns, such as raising residents' risk for obesity, diabetes, depression, high blood pressure, stroke and heart disease. Andrew Square is a low-income community, and its residents face numerous challenges that also create environmental stress and health concerns.</p> <p>We urge Massport to work with Andrew Square to lessen the negative impact of the jet noise. To this end, Andrew Square should be included in sound proofing programs and noise abatement initiatives that Massport is implementing in other communities. We understand the unique way the FAA measures noise, but Andrew Square is continually penalized with early morning flights, which should be factored into the overall impact of what our neighborhood faces.</p> <p>Andrew Square has nearly 3,000 low-income housing units in three Boston Housing Authority family housing developments, as well as subsidized senior housing developments. In addition to its large population of low-income residents, Andrew Square also experiences an influx of addicted and homeless individuals everyday due to the neighborhood's proximity to Mass and Cass. This ongoing stress on the neighborhood is exacerbated by the incessant, thunderous sound of airplanes and jets from Runway 27, which is particularly harmful so early in the morning.</p> <p>The Andrew Square Civic Association would like to take this moment to demand once again that the FAA change the flight path of Runway 27 back to its original position. A 1994 Executive Order (President Clinton, no. 12898) mandates that federal agencies address disproportionate environmental harm, including noise, on minority and low-income communities, such as Andrew Square. We note the following:</p> <ul style="list-style-type: none"> <li>· The Runway 27 flight path was changed without required public notification and public hearing process.</li> <li>· The flight path also was changed without an environmental impact statement. This review should have been completed based on the agreed-upon flight pattern for Runway 27 that resulted from a prior lawsuit and from a prior environmental impact statement. The Andrew Square Civic Association therefore calls on the FAA to immediately restore the original Runway 27 flight path and comply fully with all legal and procedural requirements. As mentioned, Andrew Square already balances significant environmental, health, and socioeconomic challenges. The FAA's change to the Runway 27 flight path, implemented without proper public process or environmental review, has increased these stresses resulting from increased and early-morning aircraft noise that directly harms the health and quality of life for Andrew Square residents. We are asking Massport, as part of its 2025 Strategic Plan, for some relief by including Andrew Square in soundproofing and sound abatement programs.</li> </ul> <p>Sincerely,  Linda Zablocki - President, Andrew Square Civic Association  Pattie McCormick - Vice President, Andrew Square Civic Association  Maria Bermudez – Leadership Team, Andrew Square Civic Association  Mary Moore – Leadership Team, Andrew Square Civic Association</p>
59 Multiple Comments: DPAs (Boston and Chelsea), Climate Resiliency, Land Acquisition and Programming, SP Public Process	Waterfront Stakeholders	Boston	Conservation Law Foundation, Boston Harbor Women of Color Coalition, Mystic River Watershed Association, Save the Harbor Save the Bay, and The American City Coalition		Submitted Written Comment Letter. The comment letter includes supporting the working waterfront and the Designated Port Areas in Boston harbor and Chelsea. Comments include climate resiliency and mitigation strategy to reduce flooding by 2070. The DPAs should include climate adaptive infrastructure. Supportive of placemaking in South Boston and beyond as part of the land acquisition strategy. Critical of the SP public outreach process.
60 Multiple Comments: Supportive Letter, DPA, Coastal Resiliency, Placemaking, Equity	Boston Harbor Now	Boston	Boston Harbor Now		Submitted Written Comment Letter. Supportive of the Strategic Plan. Supportive of eliminating flood pathways especially impacting Environmental justice communities. Advocate to Massport to improve waterfront access within DPAs.
61 Multiple Comments: Logan Growth, Environmental Justice, New Infrastructure, Ground Transportation, workforce.	Councilor Gabriela Coletta Zapata	Boston	City Councilor / City of Boston		Submitted Written Comment Letter. Comments express concerns over Logan growth, future infrastructure investments and community impacts. Letter also expressed support for the workforce, many of whom live in neighborhood communities.

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62	Mutiple Comments: Climate, SAF, Aviation Emissions and Growth, Ground Transporation, Maritime	Paulina M	Boston	Conservation Law Foundation	Neither agree nor disagree	Submitted Written Comment Letter [CLF will send written comments over email to community@massport.com with acoppola@massport.com, eskokic@massport.com, and fleo@massport.com in the CC line, as the comments did not fit within the limit of this text box.]  The Conservation Law Foundation ("CLF") appreciates the opportunity to comment on the Massachusetts Port Authority's 2025 Strategic Plan. As New England's leading environmental advocacy organization, CLF recognizes Massport's critical role in regional transportation infrastructure while emphasizing the urgent need for bold climate action and environmental justice (EJ) considerations in all strategic planning efforts.  Our comments will focus on the following pieces of the plan, and recommendations for strengthening them: (1) climate alignment and decarbonization; (2) environmental justice and community impact; (3) sustainable transportation connectivity and ground transportation; (4) maritime operations and the Port of Boston; (5) climate adaptation and resiliency; and (6) the context of this strategic plan amongst other Massport planning processes.
63	Port of Boston, Conley Terminal	Dawn S	Boston, South	None	Neither agree nor disagree	What are you doing about the noise coming from Conley Terminal when the cargo ships are being unloaded? I live on East Third Street, and the noise at night is a problem for neighbors in that area. I attended all the meetings regarding the larger ships coming into the terminal, and you have yet to come up with a solution. Tired of hearing the beeping sound at all hours, I bought my house 30 years ago before the upgrade was a vision.
64	Port of Boston, Flynn Cruiseport	John S	Andover		Neither agree nor disagree	Please listen! I have written to the CEO several times weekly during the months of June, July and August this past year without response. The daily barrage of overhead advertising abd welcoming from him invites patrons to Boston. However he does not indicate he hears any feedback. I worked for the cruises that greet people at the airport and send the to the ships. Many hundreds come in at various times and must wait until those onboard disembark before leaving Logan for the Flynn cruiseport. Their stay is not pleasant at all. There is limited food and extremely limited seating at baggage claim! Please address this. Terminal C has at least expanded seating but A and both B terminals are woefully inadequate!
65	Port of Boston, Flynn Cruiseport	Rebecca K	Brookline, MA		Strongly agree	I am happy to see that increasing the use of the cruise port is a priority. I am a cruiser and I would really enjoy more trips out of Boston particularly with a focus on destinations other than Bermuda and Canada. I hope the variety of cruise lines can also be improved on. I prefer Norwegian Cruise Lines but would like to see more Royal Caribbean, Virgin Voyages, etc.
66	Port of Boston, Flynn Cruiseport	Aline K	Hudson	KAPR	Agree	The Flynn doesn't provide a welcoming experience. The Black Falcon Terminal is basically a warehouse into which MassPort puts some folding metal chairs. It doesn't give tourists a comfortable place to sit, good maps of the city, or guidance on what to visit and where to shop. Amenities include: - Bathrooms (may or may not have soap) - A few scattered vending machines - A very small "Welcome to Boston" kiosk that is usually unattended - Electric lights It lacks any heat, which makes the place miserable on cold, windy, or rainy days. Passengers sit on their uncomfortable folding chairs and shiver while they wait to board their bus. The pier workers who spend the entire day moving tourists in and out of the Cruiseport don't even have a place where they can warm up. A cruise ship in port may put out a coffee or ice water stand for their passengers. If they don't, only vending machine "refreshments" are available. The doors of the cruise port look like those of a commercial garage. Cruise ship passengers tend to be elderly and many have mobility issues but they like to travel. These folks have been to other cruise ports in US cities and overseas. Boston's Raymond Flynn Cruiseport does not impress them. They get cold on bad days and annoyed at the facility's minimalist atmosphere almost all the time. They often take out their irritation on tour guides and bus drivers. I have had passengers ask me about the nearest Walgreen's, public transportation (the Silver Line buses go only to South Station), shopping, etc. The Cruiseport's vast space offers lots of opportunity for a nicely appointed lounge, a Dunkin outlet, souvenir vendors, a place to buy some aspirin or toothpaste, etc. Those things could bring in revenue, as well. There are many other opportunities to make Boston's cruise ship visitors feel welcome and cared for, as well as to make it easy for them to visit our attractions. The city has a whole army of tour guides working or volunteering for a variety of organizations. Just ask us. We'll tell you.
67	Port of Boston, Flynn Cruiseport	Aline K	Hudson	KAPR	Neither agree nor disagree	Cruiseport: In the Open Space. At the third gate, called Open Space, passengers don't get much comfort and protection. Instead, they walk up to a half mile, sometimes in the rain or the hot sun, to reach the tour buses for onshore excursions. Unless, that is, the buses have been directed to back up along the pier with the water of the Reserved Channel about six inches away. If passengers have to wait for a tour to start, they sweat in the sun or get soaked in the rain—while standing up the whole time. Not so much as an awning shelters them from sun and rain. Nor do benches offer respite for the many passengers who are disabled, old, or just plain tired. Here's the irony: Open Space is where the smaller, luxury ships often dock when bigger vessels take up Gate 1 and Gate 2. That means the passengers with the most money to spend, and who are most accustomed to the best a city has to offer, get the worst treatment from Boston. Does this make sense to anyone? When I'm waiting for a tour wearing a lanyard with a Transportation Workers Identity Card (TWIC), I'm often mistaken for a Massport employee. They ask me questions as they emerge from the warehouse looking disoriented and confused. Often, they are peering at printed maps of the city. When I ask them what they are looking for, they inevitably answer: "Where are we?"  The questions I hear most, along with the answers, are: How do I get into the city? Passengers have several options. (1) They can walk; it's about two miles to the New England Aquarium. (2) They can take shuttle buses IF their cruise line paid for them. (3) A third option is to use a ride share such as Lyft or Uber, although passengers have no idea where to tell the driver to pick them up. (4) And they can use the Silver Line on the T, although most have no idea what it is, where to wait for it, or how to change at South Station. Massport provides no guidance or direction except for those printed maps of the city. Revenue Opportunity: See below. Where are the shuttle buses? If the cruise ship has paid for shuttle buses, they come and go at the western end of the Cruiseport, out in the open. Not every cruise line does this, however. If there are no shuttle buses and passengers are not taking a tour, they are on their own. See #1 above. Revenue Opportunity: Massport could run shuttle buses on a regular basis whenever a ship (or ships) is in port. Even if they only charged \$5 per person, a full bus would bring in \$260. Where do I tell my Uber/Lyft ride share to pick me up? This can be touchy. Passengers don't know where they are or what directions to give the driver. They don't know if there's a designated ride-share pickup location. The Dunkin on Drydock Ave. has a sign at the curb that says no pickups here. The Innovation Design Building doesn't want them in their parking lot, either. And if they pull up to the curb at the Cruiseport, they are likely to be in the way of the tour buses and the taxi stand. That's dangerous. Revenue Opportunity: Massport can at least put up a sign at a designated ride-share pickup/dropoff point to avoid confusion and dangerous situations. Where can I park? This question usually comes from someone waiting to pick up a passenger during a "debar," which is when passengers are leaving the ship. A parking garage on Drydock Avenue, offers paid parking. Their other choice is Massport's Cell Phone Waiting Lot on Fid Kennedy Avenue, which is free but difficult to find. They might stop listening to directions when you say, "Turn left where it says Do Not Enter."  Is there drug store nearby? For part of the day, passengers may find what they need at a little shop in the Cruiseport called the Seafarers Shop. It carries a wide variety of merchandise at reasonable prices, which includes some shelves of drugstore items. So, if all they need is an aspirin, a bandage or some Pepto Bismol, they can probably get it there.
68	Port of Boston, Flynn Cruiseport	Aline K	Hudson	KAPR	Neither agree nor disagree	Another badly needed improvement involves the sidewalks outside the Cruiseport. Many of the passengers on big ships have mobility impairments. These range from a cane to a wheelchair. We also see electric scooters and rollators, not to mention casts and walking boots. These folks take cruises because they can move easily around the big ships. When they reach the sidewalk, however, things change.
69	Port of Boston, Flynn Cruiseport	Aline K	Hudson MA	Tour Guide	Neither agree nor disagree	I have written three blog posts about how Massport can improve the Port of Boston and the Flynn Cruiseport. I have never received a response from Massport. You can read those blog posts, with a variety of recommendations for improving the facilities here: <a href="https://bit.ly/4hGVPWo">https://bit.ly/4hGVPWo</a> , <a href="https://bit.ly/4508L1D">https://bit.ly/4508L1D</a> , <a href="https://bit.ly/43pUr4o">https://bit.ly/43pUr4o</a> . I would be happy to speak to someone in person about my personal experiences and my comments. [ <b>FL NOTE: tried Link, did not work</b> ]
70	Port of Boston, Maritime, Boston Harbor	Dave W	Graves Ledge, 1 Broad Sound Boston Harbot	Graves Light and Fog Signal Station	Neither agree nor disagree	It's time to get creative about expanding the opportunities for Boston Harbor and beyond. If you kindly take a moment and see what we've accomplished at Graves Lighthouse, you'll see for yourself how dedicated we are to the future of the harbor. Our passion speaks for itself - we want to play a part in the next chapter! - Dave and Lynn

Topics	Full Name	City/Town	Your Organization	Does the strategic plan document clearly communicate Massport's priorities in the next ten years?	Please provide any additional written commentary here. Thank you for your feedback.
71 REAM, Environmental Justice	The American City Coalition	Boston,Roxbury	The American City Coalition		Submitted Written Comment Letter - Ground transportation plans for Summer and D Streets must include access to Roxbury. Environmental Justice Community equitably share in benefits.
72 Regionalization	John V	Winthrop, Ma.	NONE	Disagree	Please see Boston Globe Regional Airport op-ed Submitted Separately Through Massport Staff Person.
73 Worcester Airport	Esteban R	Worcester		Agree	<p>Despite living within 20 minutes of Worcester airport and having traveled through the airport on a handful of occasions, I have no option but to take the hour-plus trip to &amp; from Logan Airport upwards of 35 times per year. As outlined in the Strategic Plan, 1 in 3 passengers to Logan airport travel from beyond I-495 to fly via Logan airport, which includes all of Central and Western Massachusetts, meaning many of us drive right past Worcester Airport on the way to Logan. As a resident living beyond the highway, I'd like to provide some context as to why I skip Worcester on each of my trips. I appreciate many of the conveniences offered at the airport through quick security, low crowds, affordable parking, and ease of access, but the main obstacle to my use of the airport comes down to scheduling.</p> <p>For Delta, there is one daily flight to LGA departing in the late afternoon, arriving at 5:30PM daily. This flight is nearly impossible for me to take as a business traveler, as there are no backup options for me in the event that my flight is delayed or cancelled. I've had instances where my flight is cancelled, and I'm often able to pivot to another flight on the same day or pivot to a different schedule via a different airport. Worcester has none of these options, and if the flight is cancelled, the only option would be to travel to Boston and take another flight or travel the next day. For vacations, this may not matter, but not having that option as a business traveler is enough to have me avoid this option entirely for any job. However, even without this concern, on an on-time departure and arrival, the flight connections often end up arriving at the final destination late into the evening after 10 PM. My job closely aligns with field service technicians/engineers, and with my schedule, arriving at 10PM only to need to wake up at 4AM for an inspection is not doable. In the event that someone is traveling for a daily meeting in Manhattan, the departure time also means an additional night is needed to be booked, adding additional travel costs, providing another reason to ignore the airport overall. And finally, on the return, the flight leaving NY for Worcester departs at 2:45 PM, providing a tight window for return trips back to the airport.</p> <p>The obstacles listed above, in combination with the Strategic Plan statement that capacity at Logan will need to be reallocated in the near future, informed my following suggestions:</p> <ol style="list-style-type: none"> <li>1.Prioritize Early Morning Departures &amp; Evening Arrivals in discussions with airlines to provide a viable option for short-hop business travelers to PHL &amp; LGA, along with added flexibility for connecting passengers.</li> <li>2.Expand flight capacity to include additional hubs (JFK, ORD, DTW, ATL) for increased redundancy.</li> </ol> <p>While I understand that there is an effort to provide the airlines with guaranteed revenue, I think that any revenue guarantees would be futile without additional modifications to the scheduling for these airlines. A well-connected Worcester Airport could function in the same way as White Plains Airport in New York, where it serves as a pressure relief to business travelers not wanting to deal with LGA, JFK, or EWR. A hub-focused departure schedule built around the idea that many passengers will be connecting at another airport would much more effectively take the load off Logan Airport while providing a steadier stream of income compared to leisure travel. If Worcester can maintain NY bound flights on a more optimal schedule, it will be the only non-Logan option to connect to NY out of the 6 competing airports, which could very effectively allow for it to pull ahead in enplanements when combined with the incredibly short flight duration. Many of the competing airports to Worcester (BDL, PVD, MHT) heavily utilize hub focused schedules, and offering flights that compete in this hub-oriented space will enable Worcester to continue its explosive growth over the coming years.</p>
74	Eda K	Boston, South		Strongly agree	



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March 6, 2026

Massport Strategic Business and Planning Department  
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East Boston, MA 02128  
*Via electronic mail: [community@massport.com](mailto:community@massport.com)*

***RE: 2025 Draft Massport Strategic Plan***

Dear Members of Massport's Strategic Business and Planning Department:

Boston Harbor Now appreciates the opportunity to comment on Massport's 2025 Draft Strategic Plan.

Boston Harbor Now's mission is to ensure that Boston Harbor, its waterfront and islands are accessible and inclusive and that these special places are properly adapted to the risks of climate change. We advocate for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services, as well as waterfront activation that welcomes everyone, especially those who have been historically excluded. We do this through a variety of initiatives - including the Stone Living Lab - with the goal of realizing our Harborwalk 2.0 vision of a vibrant, welcoming, and resilient coastline along Boston's 47-mile waterfront. We also strongly support active maritime uses on the Harbor, including on Massport's properties.

We commend Massport for making measurable progress since the last Strategic Plan was promulgated in 2014. Improvements and growth at the Conley Terminal, Flynn Cruiseport, and Airport in particular have been tremendous boons for existing and emerging industries, the regional economy, and job creation; and we're impressed with the opening of Piers Park II, ventures at the Fish Pier, and an increase in community-centered programming on Massport properties.

Overall, Boston Harbor Now supports Massport's new Strategic Plan. These brief comments on the plan are focused on climate resilience on Massport properties, and activating Massport's maritime and real estate assets surrounding Boston Harbor.

**Coastal Climate Resilience**

We appreciate that Massport has a comprehensive plan to protect its coastal properties from climate impacts as well as your focus on district-scale solutions that aim to protect surrounding neighborhoods from sea level rise, tidal flooding, increased precipitation, and storm surge. We urge you to ensure that

flood pathways are also protected - especially those that impact inland Environmental Justice communities.

We also hope you will expand communications and outreach with neighboring communities impacted by coastal flooding throughout design and construction of climate resilient infrastructure. An excellent example of proactive community engagement is happening surrounding Massport's creation of a new, resilient Harborwalk loop at Reserved Channel.

We are grateful that Massport is already engaged in active conversations with the Stone Living Lab around implementing strategies like living seawalls and other nature-based resilience adaptations on Massport properties. As Massport looks to protect its assets and the neighborhoods along Boston Harbor, we recommend that nature-based approaches and hybrid solutions are prioritized wherever feasible.

### **Massport Property Activation**

We appreciate Massport's placemaking work to activate its properties around Boston Harbor, and commend your work to diversify program audiences to include those who have been historically underserved by the benefits of the waterfront's green and blue public spaces. We know that it takes considerable amounts of time and investments to build community trust towards creating truly vibrant and welcoming waterfront spaces, especially in areas where people have historically been cut off from Boston Harbor.

To reach these goals, we urge Massport to lean on existing community networks to activate properties, and increase funding commitments to both the REAM team and to provide grants to external community partners. In particular, we hope Massport will further engage and support nonprofit partners to expand accessible and inclusive programming, especially in South Boston and East Boston, and on undeveloped parcels. As we have discussed with Massport's staff, Boston Harbor Now has relationships with over 400 community groups and would be happy to help bring more diverse audiences and underserved communities to Massport properties, creating a sense of belonging.

We also suggest you strategically employ the results of Boston Harbor Now's recent [Waterfront Visitation and Equity Study](#), when working to create a sense of belonging for underrepresented communities along the waterfront. The study identifies who the 11 million visitors are to Boston's waterfront each year, as well as who is not sharing in equitable access. The study provides tools, insights, and practices that can help Massport to direct efforts and investments so these waterfront spaces are places of joy, health, resilience, and connection for all.

Finally, we hope Massport will make a concerted effort to identify opportunities to create and improve waterfront access within Designated Port Areas, where there may be portions of properties that can include public access while still maintaining adjacent industrial uses. Boston Harbor Now would appreciate the opportunity to meet to discuss creative ways to increase public access to waterfront spaces in a way that prioritizes safe and efficient operations of maritime industries.

We look forward to partnering with Massport to help implement your strategic goals, especially as related to a coastal resilient waterfront and activating your properties in support of diverse audiences.

Thank you for your consideration. Please contact me with questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", with a stylized flourish at the end.

Kathy Abbott  
President & CEO

CC: Alaina Coppola, [acoppola@massport.com](mailto:acoppola@massport.com)  
Emir Skokic, [eskokic@massport.com](mailto:eskokic@massport.com)  
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CHRISTOPHER ELIOT PHD

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## Comments on the Hanscom Field Strategic Plan

Thank you for the opportunity to comment on the draft 10 year Massport plan "Going Above & Beyond". Clearly a lot of thought and effort has gone into preparing this plan which contains useful analysis of threats due to rising sea levels, traffic problems and other expected developments. The attempt to anticipate and react to future problems is laudable. My comments also respond in part to The Massachusetts and Regional Aviation Fuel Study<sup>1,2</sup> The clear ability of Massport to engage in deep and technical analysis is in contrast with my view that SAF is not a viable path to addressing the climate impact of aviation.

My strongest concern is a wide gap regarding the future impact of air operations on climate change. A fundamental assumption of this report is that SAF will mitigate the climate impact of aviation. This is false and consequently the report is flawed in its projections of climate impact relative to aviation. Even though I think SAF is a fundamentally flawed solution, The Massachusetts and Regional Aviation Fuel Study shows a maximum regional capacity to produce SAF at or below current levels of jet fuel consumption, i.e., there is no room to grow fuel supplies using SAF. I believe there should be no expansion of aviation capacity until climate friendly operations, such as a substantially complete transition to SAF, is in place and validated. In the decades that SAF has been promised, aviation has greatly expanded but SAF has implemented a negligible portion of a solution. It is time to solve the climate problem first, and leave expansion to come second.

My direct concern is about Hanscom Airport. Private jets are the single most environmentally harmful form of transportation available and it seems incomprehensible that Massport would propose and support expansion of private jet usage without having a mechanism *in place* to mitigate the harm. I don't believe in the prospects for using SAF: it

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<sup>1</sup> <https://research-hub.nrel.gov/en/publications/massachusetts-and-new-england-sustainable-aviation-fuel-study/>

<sup>2</sup> <https://docs.nlr.gov/docs/fy26osti/97669.pdf>

is a future promise with much uncertainty and many risks. No one can say that widespread usage of SAF is a solution *in place*. It is not possible to say with certainty that SAF will ever be commercially competitive or widely used. At best SAF is a potential, partial solution to the impact of aviation on climate change.

My analysis of SAF is based on numerous authoritative sources and agrees with other published studies. I have not seen any convincing rebuttal of this information. Massport, the IATA and the aviation industry are fully capable of reproducing these results so I assume they are well understood. The continued publication of contradicting claims is troubling.

Technically, a fuel can be called SAF if it reduces carbon emission by 50%. However, the FAA predicts a large increase in enplanements in the coming decades, growing from 747 million in 2025 to 964 million in 2035 and 1,212 million in 2045<sup>3</sup>. This projections shows that the growth of aviation could almost double by 205, so even it is was 100% fueled by SAF with 50% reduction in climate impact there would be no reduction in total harm.

Another general problem with discussion of SAF is that goals and progress are stated in terms of gallons of SAF produced or used, which is not the correct metric. Instead, the number of tons of CO<sub>2</sub> reduced should be reported, to make different kinds of processes of SAF comparable. For example, one type of SAF might achieve 50% reduction (per gallon) while another achieves 75% reduction (per gallon). This distinction is lost when only gallons produced or used are reported. The complete lifecycle climate benefit of each proposal needs to be calculated and presented so different ideas can be properly compared.

There are dozens of ways to produce SAF, each with different potential and problems. For simplicity I divide these into Waste Based, Crop Based and Energy Based categories of SAF. None of these categories of SAF can be expected to address aviation's impact on climate change, but for different reasons.

## WASTE BASED SAF

The only current source of SAF is produced from UCO (Used Cooking Oil) by a process known as HEFA (Hydroprocessed Esters and Fatty Acids). HEFA "is the most economically promising methods for the decarbonization of aviation now."<sup>4</sup> achieves a "70-90% lifecycle reduction of emissions over fossil-derived jet fuel". However, even this industry source acknowledges serious problems:

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<sup>3</sup> [https://www.faa.gov/data\\_research/aviation/aerospace\\_forecasts/2025-faa-aerospace-forecasts.pdf](https://www.faa.gov/data_research/aviation/aerospace_forecasts/2025-faa-aerospace-forecasts.pdf)

<sup>4</sup> <https://www.intelmarketresearch.com/blog/23/used-cooking-oil-uco-sustainable-aviation-fuel-market>

- “Scarce UCO supply (~8M tons/year) cannot satisfy the enormous fuel requirement of aviation”,
- “UCO-to-SAF is currently 3-5× more expensive than standard jet fuel, mainly because of costly green hydrogen requirements for hydroprocessing.”
- “Existing catalysts have short lifetimes when treating impure UCO, and they need frequent replacement.”

These problems are consistently described in every analysis of HEFA SAF production, albeit with slightly different numbers reflecting different assumptions or data sources. These are only some of serious problems with the simplest and best developed form of SAF production. The scarce supply of UCO<sup>5</sup> limits production by this method to under 0.5% of the jet fuel required. Furthermore, since UCO is also used, more easily, to produce bio-diesel the limited quantity of SAF produced by HEFA does not actually produce any environmental benefits. Every gallon of HEFA sourced SAF means the trucking industry must burn another gallon of fossil sources diesel fuel. Furthermore, the high value of bio-fuels can create an incentive to “cheat” by using raw oils as a feedstock; in fact instances of this fraudulent commerce have been documented<sup>6</sup>.

Other forms of “waste based” SAF production are equally limited by feedstock supply, including animal byproducts, wood chips, seaweed and municipal waste. There simply are not enough sources of “waste” organic carbon sources to produce SAF in the quantities desired. Moreover, many of the sources are small and geographically distributed so it would be a logistical nightmare attempting to collect and transport these materials to a large central plant where they could be efficiently converted into SAF. The material transportation would require large amounts of its own fuel, impacting any climate gain from SAF production. UCO is not really a “waste” source anymore, because it is widely used for bio-diesel production. Municipal waste (currently) has no other beneficial use, although attempts have been made to use it for fuel. *The Massachusetts and Regional Aviation Fuel Study* claims to have identified sufficient sources of wood chips and municipal waste and will be discussed later.

## CROP BASED SAF

SAF can also be produced from various crops. There are supposed to be rules around life cycle accounting and land use change to ensure that any (potential) production of SAF from crops is really beneficial to the climate. The reality is that industry lobbyists are laser

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<sup>5</sup> [https://cleanfuels.org/wp-content/uploads/GlobalData\\_UCO-Supply-Outlook\\_Sep2023.pdf](https://cleanfuels.org/wp-content/uploads/GlobalData_UCO-Supply-Outlook_Sep2023.pdf)

<sup>6</sup> <https://biomassmagazine.com/articles/senators-press-federal-agencies-on-concerns-over-fraudulent-uco-imports>

focused on these “accounting rules” with the intent to discount much of the carbon emissions resulting from crop based production of SAF. These secondary sources can include direct and indirect land use changes, use of diesel engines to irrigate fields, fertilizer production, and fuel for tractors and trucking. At a minimum, this introduces serious uncertainty about claimed benefits from SAF production. Since all of the production emissions happen “behind the scenes” it is impossible for the public consumer to really verify any claimed environmental benefits. Most proponents of SAF are the very industries that have a massive financial stake in the debate, which undermines the confidence in their objectivity.

The amount of land required for crop based SAF is almost too much to comprehend. I used various published sources to estimate the land required to supply US airlines with crop based SAF, including BETO-2023<sup>7</sup>. The best estimate of production yields from major crops<sup>8</sup> is shown in Table 1.

Table 1

	Gallons per Acre per Year
<b>Soybean</b>	32.3
<b>Barley</b>	62
<b>Corn</b>	207

Using those figures I calculated the total land area required to produce SAF from crops, and compared that with the size of some of the largest states in the US, Table 2. Even though corn is the most production crop source of SAF at 207 gallons per acre, the land area required to produce 35 billion gallons of SAF is larger than the state of Texas. The amount of corn required to produce SAF is larger than the current corn crop. Using soybean or barley is significantly less efficient. Suggesting that crops could be used to produce a percentage of the required SAF does not really help, because the inefficiency per acre is still the same. Devoting this amount of land to production of jet fuel would obviously impact food production, reduce food exports and require people in other parts of the world to convert forest land to cropland to avoid starvation. These land use changes would more than eliminate any environmental benefit of using SAF.

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<sup>7</sup> 2023 Billion-Ton Report: An Assessment of U.S. Renewable Carbon Resources

<sup>8</sup> <https://goodineverygrain.ca/2021/08/26/how-many-pounds-of-grain-can-one-acre-produce/>

<https://www.wri.org/insights/us-sustainable-aviation-fuel-emissions-impacts>

These figures are new and may differ slightly from the original source used in the calculations.

Different methods of estimation produce slight different numbers, but in all cases the land required for SAF production is prohibitive. The Land Art Generator<sup>9</sup> estimates 1.8 million km<sup>2</sup> in 2025 and 5.5 million km<sup>2</sup> in 2050, which closely agrees with my estimate.

Producing SAF from a variety of crops or different sources just masks the problem. It is the lack of efficiency per acre of production that is the concern. The cost in acres per gallon is too high, whether production is large or small.

Table 2

SAF per Acre	State and other areas <sup>2</sup>	Land Area <sup>1</sup>		
		Sq. Mi.	Sq. Km.	Acres (millions)
	<b>Total<sup>3</sup></b>	<b>3,535,932</b>	<b>9,158,022</b>	2,263.0
	<b>United States<sup>4</sup></b>	<b>3,531,905</b>	<b>9,147,593</b>	2,260.4
32.40	SAF from Soybean	1,687,748	4,371,251	1,080.2
62.00	SAF from Barley	882,056	2,284,517	564.5
	Alaska	570,641	1,477,953	365.2
	Cropland	556,250	1,440,682	356.0
	Pasture	492,188	1,274,761	315.0
<b>200</b>		273,438	708,200	175.0
207.00	SAF from Corn	264,191	684,252	169.1
	Texas	261,232	676,587	167.2
<b>300</b>		182,292	472,134	116.7
	California	155,779	403,466	99.7
	Montana	145,546	376,962	93.1
	Corn Production	140,625	364,217	90.0
<b>400</b>		136,719	354,100	87.5

<sup>9</sup> <https://landartgenerator.org/blagi/archives/78177>

Table 3

Annual Values						
Massachusetts Jet A Usage	11,768	million barrels				<a href="https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_jf.html">https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_jf.html</a> and ICCT
Gallons per barrel	42					<a href="https://en.wikipedia.org/wiki/Barrel_(unit)">https://en.wikipedia.org/wiki/Barrel_(unit)</a>
Massachusetts Jet A Usage	494,256	million gallons		Jet A per year		ICCT or 11,768 X 42 and round
Density of Jet Fuel	3,060	kg / gallon		Ratio		<a href="https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_jf.html">https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_jf.html</a> and ICCT
Kg jet fuel per year	1,512,423	million kg		Jet A per year		<a href="https://www.duncanaviation.aero/intelligence/how-to-figure-jet-fuel-weight-to-gallons-in-your-head">https://www.duncanaviation.aero/intelligence/how-to-figure-jet-fuel-weight-to-gallons-in-your-head</a>
Metric tons of jet fuel per year	1,512	million metric tons per year		Jet A per year		Convert kg to metric ton
C required per year	1,281	million metric tons per year		SAF Content		Multiply quantity of fuel by percent carbon content
H required per year	0,231	million metric tons per year		SAF Content		Multiply quantity of fuel by percent hydrogen content
CO2 required per year	4,694	million metric tons per year		SAF Content		For carbon input.
CO2 required per year	9,388	million metric tons per year		via Fischer-Tropsch		For carbon input
CO required per year	2,988	million metric tons per year				For carbon input
H required per year	0,231	million metric tons per year		SAF Content		For hydrogen input
H2 required per year	0,463	million metric tons per year		via Fischer-Tropsch		For hydrogen input
H2 required per year	0,450	million metric tons per year		via Fischer-Tropsch		ICCT value 0.45 should be 0.463
Air required per year	7,152,328	million metric tons per year		SAF Content		
Air required per year	14,304,657	million metric tons per year		via Fischer-Tropsch		For carbon input
Water required per year	2,069	million metric tons per year		SAF Content		For hydrogen input
Water required per year	4,138	million metric tons water per year		via Fischer-Tropsch		For hydrogen input

	Soybean Production	134,531	348,435	86.1
	New Mexico	121,298	314,161	77.6
	BETO-2023	118,750	307,561	76.0
	Woodcrop	114,063	295,421	73.0
	Arizona	113,594	294,207	72.7
	Nevada	109,781	284,332	70.3

## ENERGY BASED SAF

Finally, it is possible to produce SAF essentially using energy (electricity) by combining carbon capture, with green hydrogen production and fuel production using the Fischer-Tropsch process. Commonly this is called e-fuel or eFuel. The feasibility of this solution is thoroughly discussed in *Barriers to Implementing Sustainable Aviation Fuel (SAF) in Massachusetts*<sup>10</sup>. *There are three steps in this production method that are not economically practical with known or expected technology:*

- *Production of green hydrogen;*
- *Direct Air Capture (DAC) of carbon dioxide;*
- *Conversion of carbon dioxide to carbon monoxide.*

The energy requirements for chemical reactions are defined by the laws of thermodynamics and the potential energy of the chemicals involved. Water and carbon dioxide are two of the most stable molecules that exist, so splitting them into hydrogen or carbon monoxide is inherently difficult (energy intensive). There are numerous tricks that can incrementally improve the known processes, but there is no known scientific theory that suggests we can entirely bypass those limitations. Similarly, DAC is limited by the fact that Carbon dioxide makes up approximately 0.042% (or 420-430 ppm) of the atmosphere. Simple math can calculate the enormous amount of air that must be processed for SAF production. Even if the carbon extraction is free, it would require miles of fans with associated construction cost and energy usage. There is no way to reduce the amount of air that must be processed by DAC to obtain the raw feedstock for SAF.

The basic inputs required to produce as much SAF as Massachusetts consumes is shown in Table 3. These values are converted to energy use in Table 4.

<sup>10</sup> <https://ips-dc.org/report-barriers-to-implementing-sustainable-aviation-fuel/>

Table 4

Energy			
TWh / metric ton jet fuel	0.037	TWh per metric ton	
DAC Energy per metric ton	1.200	TWh per metric ton CO <sub>2</sub>	
CO <sub>2</sub> to CO Conversion Energy	8.530	TWh per metric ton CO <sub>2</sub>	Source 1
CO <sub>2</sub> to CO Conversion Energy	4.690	TWh per metric ton CO <sub>2</sub>	Source 2
CO <sub>2</sub> to CO Conversion Energy	5.426	TWh per metric ton CO <sub>2</sub>	
H <sub>2</sub> electrolysis	52.500	TWh per metric ton H <sub>2</sub>	Corrected
H <sub>2</sub> electrolysis	52.000	TWh per metric ton H <sub>2</sub>	Source
Jet A Energy Equivalent	18.410	TWh	
Mass Electric Usage	50.012	TWh	
Mass Electric Production	36.200	TWh	
DAC Energy Required	5.6	TWh	SAF Content
CO <sub>2</sub> to CO Energy	22.0	TWh	SAF Content
H <sub>2</sub> electrolysis	24.3	TWh	via Fischer-Tropsch
<b>Total Electric Input</b>	<b>51.938</b>	<b>TWh</b>	
Ratio Electric Input to Jet A Equivalent	2.821		
Ratio Electric Input to Mass Usage	1.039		
Ratio Electric Input to Mass Production	1.435		

The final result is that 51.938 TWh of electricity are required to supply Massachusetts with SAF using DAC and Fischer-Tropsch conversion. This is 1.435 times the current production of electricity in Massachusetts (36.2 TWh) and is 2.821 times the thrust energy produced by the SAF during flight.

These calculations are my own and I have personally verified every assumption. They have been compared with, and agree with, calculations in *Barriers to Implementing Sustainable Aviation Fuel (SAF) in Massachusetts*.

Each of the production steps require amounts of green electricity that are not available and will not be available in the foreseeable future. Diverting limited green energy capability to produce renewable energy to support production of SAF would cause other parts of the economy to produce more carbon emissions than continuing to use fossil sourced jet fuel. SAF from energy only makes sense if there are three separate technological breakthroughs that dramatically reduce the energy needs of those three steps. Intensive work in all of these areas has been ongoing for years, and there are no prospects for solution of these problems, even at the stage of basic research. There is no verified scientific process that can do it. A fundamental breakthrough tomorrow would take 20 years to reach industrial scale deployment and have little or no impact by 2050.

A focus on an incentive driven program to solve these problems is not needed and should not be expected to work. There are already huge financial incentives for companies to develop better versions of these technologies, since hydrogen and carbon monoxide are heavily used in steel production and other industries. DAC would benefit all consumers of fossil fuel, so there is already a strong investment interest in any possible solution to that problem. It is not a lack of incentive to solve these problems; there simply isn't any fundamental scientific theory to suggest a real solution.

## HYDROGEN

Large quantities of hydrogen are required to produce e-fuel. It is also a primary input to many industrial processes, such as steelmaking, so there is a longstanding incentive to improve methods for hydrogen production. Hydrogen reactions are highly energetic so there is interest in using hydrogen as a fuel or even to power aircraft. Hydrogen converted to ammonia can power ships. Hydrogen has a high power to weight ratio and combustion produces water.

Despite this powerful incentive, the only climate friendly source of hydrogen in use is electrolysis. There are many projects worldwide attempting to increase clean hydrogen production, but a large percentage of these are shutting down for lack of economic viability. Hydrogen powered vehicles do not compete with battery powered vehicles; steelmakers continue to use fossil sourced hydrogen for cost reasons.

Even worse, it has recently been found that hydrogen is not as climate friendly as previously thought. Although water is the combustion product, releases of pure hydrogen are very harmful.

“Through interactions with other gases, however, hydrogen indirectly heats the atmosphere roughly 11 times faster than carbon dioxide during the first 100 years after release, and around 37 times faster during the first 20 years.

The main way hydrogen contributes to global warming is by consuming natural detergents in the atmosphere that destroy methane.<sup>11</sup> This discovery essentially eliminates hydrogen as a climate friendly option for aviation fuel and would potentially further reduce the benefit of e-fuel production.

Incentives for production of SAF would be redundant because hydrogen production is already highly incentivized.

## DAC

Direct Air Capture (DAC) has long been touted as a way to reverse climate change. Carbon scrubbers in power plants can effectively capture carbon from concentrated flue gasses for sequestration, but capture from ambient air is much harder due to its low concentration, about 420 ppm. While it is technically possible to implement DAC, the energy requirements are huge. Simply moving the air required for DAC is difficult. The resulting cost of DAC technology is currently prohibitive and does not seem to be quickly improving.

Incentives for production of SAF would be redundant because DAC is already highly incentivized. There are no efficient demonstrations of DAC to date.

## CONVERSION OF CARBON DIOXIDE

“Carbon monoxide (CO) is a crucial industrial gas used extensively in chemical manufacturing, metallurgy, and various technological applications. Its versatility makes it indispensable in modern industrial processes.

[...]

Here are some of the main ways CO is used in the chemical industry:

- Methanol production: carbon monoxide reacts with hydrogen through a catalytic process, which creates methanol – an essential component for manufacturing plastics, paints, and synthetic fuels.

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<sup>11</sup> <https://sustainability.stanford.edu/news/overlooked-hydrogen-emissions-are-heating-earth-and-supercharging-methane>

- The Fischer-Tropsch process: this process uses carbon monoxide and hydrogen to produce liquid hydrocarbons. These synthetic fuels provide an alternative to traditional petroleum-based products.
- Acetic acid production: carbon monoxide enables acetic acid production through carbonylation reactions. This process yields a vital chemical used in everything from vinegar to photographic films.”<sup>12</sup>

There is already a strong economic incentive to improve production of carbon monoxide, but it is still a highly energy intensive. Incentives for production of SAF would be redundant because carbon monoxide production is already highly incentivized.

## HISTORICAL SAF PRODUCTION

The aviation industry has set a number of goals for SAF production and missed them all.

“In 2011, IATA targeted SAF to represent at least 6% of all jet fuel used in the aviation sector by 2020. Due to prominent headwinds in global production of SAF, the target was lowered to 5% in 2012 and further reduced to just 3% in 2014. Despite breakthroughs, the aviation industry managed to increase the amount of SAF, representing [only] 0.03% of all aviation fuel by 2020.”<sup>13</sup> I see this as a sign of failure, not as reason to believe that success only requires more effort.

## MASSACHUSETTS AND NEW ENGLAND SUSTAINABLE AVIATION FUEL STUDY

The NLR report claims there are enough source of feedstocks to generate enough SAF for the New England region<sup>14</sup> using MSW (Municipal Solid Waste) and logging residues. The report focusses on feedstocks and transportation, but does not drive deeply into production problems. Calculations of the climate impact of transporting the biomass to SAF production facilities are ignored, but presumably require lots of diesel for trucking. The source of hydrogen and energy required is entirely ignored, but could render this source of SAF impractical. The total claimed *theoretical* SAF production capacity is roughly equal to the current amount of jet fuel used in the region, so even if the report is completely correct there is no capacity to expand aviation while remaining climate friendly.

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<sup>12</sup> <https://westairgases.com/blog/carbon-monoxide-uses/>

<sup>13</sup> <https://www.globalair.com/articles/the-history-of-saf-target-dates-and-what-it-will-take-to-hit-the-2050-goal/11418>

<sup>14</sup> <https://docs.nlr.gov/docs/fy26osti/97669.pdf>

Last year Massport was touting e-fuel as the best source of SAF, now it is promoting MSW and woody biomass as feedstocks. I have been watching news about SAF for about 5 years and I am not surprised to see the claims and proposals shifting this quickly. There is a pattern of chasing one source of SAF for the brief period of time and then shifting to similar claims about another source. I believe this reflects a desperate need to reconcile aviation's need to SAF with the fact that it is not viable. I would be very happy to see truly climate friendly SAF deployed, but the shifting claims undermine true confidence in the planning. I can understand that conclusions will shift as new evidence becomes available, but if the topic is still not fully understood then it is not well enough understood to be counted on.

"A techno-economic analysis was conducted on total New England state (and select New York Counties) feedstocks to estimate a theoretical maximum total biofuel potential of 850 million gallons of gasoline equivalent per year."<sup>(iii)</sup> Table 2 on page 3 shows New England jet fuel consumption at 722 million gallons per year and the report indicates a total *theoretical* production capacity of 850 million gallons of SAF per year. Although "The proportion of SAF would depend on production technology pathways and biorefinery design." In other words, the region is already using 84% of the total theoretical production capacity of SAF. Since actual production is below theoretical capacity<sup>15</sup> the region is already using as much jet fuel as can be produced from SAF. There is no potential for SAF to supply fuel for *any* increase in New England aviation operations.

A plant to make SAF from woody biomass "is assumed to take 3 years to construct, with half a year spent on startup." I am no longer willing to trust claims of future success from this industry, and suggest there should be a moratorium on all airport expansion in Massachusetts until 2029 when we can determine if this SAF plant has been constructed and is used to replace fossil sourced Jet fuel. We should not make lasting expansion decisions based on an isolated small-scale study claiming viability of a technology that has never been deployed. The NLR study is an early pilot study and does not critically drill down to the level of construction detail, so there are potentially critical problems that are not revealed by this study.

"Vegetable oils and related byproducts are not locally available but could be sourced from other regions."<sup>(vi)</sup> This seems to be promoting some combination of UCO and crop-based vegetable oil, which has fundamental problems described above. Sourcing these feedstocks from other regions is not feasible, because those other regions would presumably need to produce SAF for their own needs. As discussed below, there is no crop-based source of SAF that produces a practical reduction in climate impact.

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<sup>15</sup> <https://www.beumergroup.com/knowledge/cep/what-is-the-difference-between-theoretical-capacity-and-practical-capacity-in-sortation-systems/>

The final step is Fischer-Tropsch and requires green hydrogen.

“Woody biomass includes logging residues and other removable material left after carrying out forestry operations and site conversions” (11) Various studies support this process, but economic viability at industrial scale has not been proven.<sup>16</sup> “The plant is assumed to take 3 years to construct, with half a year spent on startup.”, so let’s put off any expansion for three years and verify that the SAF production is real.

“The resource assessment found that MSW and food waste are the most abundant resources within 50- and 100-mile radii”

Addressing MSW disposal would be welcome, but needs to be proven at industrial scale. Similarly, using logging residues might work, but has only been studied recently and cannot be considered a proven technology. The total New England production capacity for SAF already equals the demand for jet fuel in the region, so this study provides no justification for expansion of aviation.

Yellow grease and animal fats have limited supply and is not economically viable, according to the study. The “minimum selling prices are still higher than that of the conventional jet fuel with brown grease,” “Biogas from food waste is not cost-effective within 50-100 miles of BAF. ... Along the same lines, producing biogas is feasible given the amount of food waste generated within a 50-100-mile range of ORH”

The report does not discuss the availability of green hydrogen, which is a major problem for FT process. As discussed below, green hydrogen does not seem to be of net benefit to the environment due to the required consumption of large amounts of green electricity, which is needed for other purposes to produce larger carbon reduction gains.

“Crop residues are generally considered a waste product, minimizing concerns about food security and land use change.” However, a certain amount of crop residue must remain to replenish the soil. There are concerns that a high price for crop-residue could lead to over harvesting and soil depletion.

“There are two Air Force bases in Massachusetts.” Actually, there are three Westover, Barnes and Hanscom Air Force base, although only Westover and Barnes support aircraft operations.

## IMPLICATIONS FOR AVIATION

There are major practical, theoretical, and financial barriers to the production of SAF and it is not fully clear that it can ever produce the environmental benefits that are claimed.

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<sup>16</sup> <https://www.resourcewise.com/blog/us-saf-update-forestry-residue-and-biogas-move-further-into-spotlight>

Major hurdles include production of green energy, green hydrogen and DAC, none of which are solved problems. Nothing in the Massport 10 year plan really addresses these issues. Promises from IATA should be discounted both because of financial conflict of interest and the history of failed promises. The objective evidence does not support claims that SAF will ever be efficient and certainly not in the next two decades. This is a false promise.

On the other hand, Massport and the aviation industry want to expand greatly, which has a 100% chance of increasing climate emissions based on vague promises that “SAF deployment could contribute 65% of the necessary emissions reductions” and no mention of where the other 35% would come from. I am deeply convinced that these claims about SAF are untrue and the promises cannot materialize. For these reasons, I believe it is necessary for the aviation industry to produce and deploy its climate solution *before* any additional expansion is tolerated. If the industry can succeed in doing what it says can be done, great. If not, we cannot tolerate the risk that further expansion would bring.

## SUMMARY

There is no reason to believe that SAF will enable aviation to become climate friendly. Even continued use of fossil source Jet Fuel is better for the planet than SAF because SAF production has hidden costs and diverts resources from more efficient ways to address climate change. Evidence in favor of SAF is produced by the very companies that have the most financial incentive to produce false information. The oil industry has a long history of publishing misinformation.<sup>17,18,19,20</sup> The campaign to promote SAF seems to be part of this pattern.

The NLR report commissioned by Massport indicates a theoretical capacity to supply SAF for current levels of aviation, but does not support the conclusion there is capacity to expand. According to the study the region uses 722 million gallons of jet fuel and could produce at most 850 million gallons. It is unlikely that actual production could exceed 84% of theoretical production, so aviation activity cannot grow if it is to be climate friendly based on the NLR report. The NLR report focusses on SAF transportation, which needs to be done, but is not my critical concern. The NLR report does not drive deeply enough into SAF production which is the more important problem.

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<sup>17</sup> <https://commonhome.georgetown.edu/topics/climateenergy/defense-denial-and-disinformation-uncovering-the-oil-industrys-early-knowledge-of-climate-change/>

<sup>18</sup> <https://www.ucs.org/climate/accountability>

<sup>19</sup> <https://www.tandfonline.com/doi/full/10.1080/09644016.2020.1863703>

<sup>20</sup> [https://www.budget.senate.gov/imo/media/doc/fossil\\_fuel\\_report1.pdf](https://www.budget.senate.gov/imo/media/doc/fossil_fuel_report1.pdf)

To protect our planet from massive destruction we must give up this fantasy. It is time to be honest: SAF will not save aviation or the planet. For this reason, I consider the Massport plan to be fundamentally flawed as it relates to aviation.

Sincerely yours,

A handwritten signature in black ink that reads "Christopher Eliot". The script is cursive and fluid, with the first name and last name clearly legible.

Christopher Eliot



Conservation  
Law Foundation

March 6, 2026

*Via electronic mail: [community@massport.com](mailto:community@massport.com)*

Massachusetts Port Authority  
One Harborside Drive  
East Boston, MA 02128  
Attn: Strategic Business & Planning Department

RE: Massport 2025 Strategic Plan

The Conservation Law Foundation (“CLF”) appreciates the opportunity to comment on the Massachusetts Port Authority's 2025 Strategic Plan. As New England's leading environmental advocacy organization, CLF recognizes Massport's critical role in regional transportation infrastructure while emphasizing the urgent need for bold climate action and environmental justice (EJ) considerations in all strategic planning efforts.

Our comments will focus on the following pieces of the plan, and recommendations for strengthening them: (1) climate alignment and decarbonization; (2) environmental justice and community impact; (3) sustainable transportation connectivity and ground transportation; (4) maritime operations and the Port of Boston; (5) climate adaptation and resiliency; and (6) the context of this strategic plan amongst other Massport planning processes.

## **1. Climate Alignment and Decarbonization**

We appreciate Massport’s commitment to sustainability and have several recommendations for strengthening the climate and decarbonization sections of the draft strategic plan. First, the plan should establish specific, measurable greenhouse gas reduction targets that align with Massport’s 2031 and 2050 net zero commitments, as it currently lacks clear timelines and benchmarks for achieving meaningful emissions reductions. The plan should also outline more details about accelerating electrification of ground support/service equipment and ensure the buildout of electric vehicle charging infrastructure in compliance with the 2017 Massport–CLF Agreement. In addition, we believe there need to be additional safeguards to ensure that Sustainable Aviation Fuel (“SAF”) investments do not entrench fossil fuel dependency or divert critical resources from electrification efforts (for example: prioritize funding for electrification efforts; adopt strict lifecycle emissions standards; and ensure transparent public reporting). Finally, we recommend that the plan addresses, in detail, how aviation emissions will be managed considering projected growth, providing a credible pathway to reduce overall climate impacts even as operations expand. Massport, and Logan specifically, is on a path of growth; with that growth comes a larger responsibility to ensure the details of a climate and decarbonization plan are aggressive enough to meet this crucial moment in time.

## **2. Environmental Justice (EJ), Community Impact, and Public Process**

We recommend that Massport integrate more environmental justice considerations and community involvement into all strategic and capital planning decisions, recognizing the disproportionate air pollution and noise burdens that airport operations impose on surrounding neighborhoods. These communities should not have difficulty accessing and communicating with Massport leadership and staff. State law and policies require enhanced engagement with residents of environmental justice communities, and Logan Airport is located near several state-designated environmental justice communities.

We recommend that Massport should take its guidance from the Massachusetts Office of Attorney General, 2021 Stakeholder Working Group publication, *Overly Impacted & Rarely Heard: Incorporating Community Voices into Massachusetts Energy Regulatory Processes*, published May 2023. While specifically applicable to the energy regulatory processes overseen by the Massachusetts Department of Public Utilities and Energy Facilities Siting Board, the recommendations of the Stakeholder Working Group can be applied in many contexts, as they center around advancing equity, improving transparency and accountability, and improving information and accessibility to knowledge by the public. For example, as a matter of course, when Massport seeks input from impacted communities, documents should be written in plain language and accessible on mobile devices and in multiple languages. To our knowledge, this plan was underway long before any community members became aware of it, and the public meeting was difficult for members of the public – and specifically those impacted by airport operations – to attend or participate in. We appreciate that the draft plan has been translated into Spanish, but to be truly accessible to the wide range of communities who have a stake in this process, translation must extend to more languages and populations.

Massport has an opportunity to be an industry leader by committing to robust environmental monitoring to track elevated levels of air pollutants and noise impacts in EJ communities resulting from both flight operations and ground transportation. By using the latest and best technology available for monitoring a wide range of air pollutants, Massport could establish a real-time data baseline of air pollution and thus be able to measure against that baseline as it continues to make advances in zero-emissions ground service equipment over the course of this 10-year strategic plan. In partnership with the Logan Work Group, Massport should also invest in targeted monitoring and mitigation measures in affected neighborhoods. These commitments should include transparent, real-time public reporting and clear accountability mechanisms tied to community health indicators to ensure meaningful protection for residents.

## **3. Sustainable Transportation Connectivity, Ground Transportation and Reducing VMT**

We appreciate that Massport is committed to tackling the 88% of greenhouse gas emissions that Massport maintains are outside of the agency's direct control. To that end, we recommend that the strategic plan include more details on how this goal might be achieved. For example, the plan could expand in all the following areas, including providing measurable benchmarks:

- Specific and clear goals around expanding public transit connections to reduce single-occupancy vehicle trips. This should include coordinating with the MBTA on improved rail service to Logan Airport, leveraging our already existing transit assets.
- Expand Logan Express and similar services in ways that reduce air pollutants and noise burdens on EJ communities. This should include a clear timeline for full electrification of the Logan Express fleet; community input on new locations for Logan Express stops; as well as ensuring that any remaining combustion engine Logan Express buses commit to a firm no-idling policy.
- Adopt stronger commitments to reducing vehicle miles traveled (VMT) and supporting lower-carbon alternatives since ground transportation at Massport facilities is a significant source of emissions and congestion. For example, within the next 10 years, Massport should commit to a detailed process to revisit various ground transportation policies such as idling; a feasibility study around an airport entry fee; revised or enhanced incentives for taking public transportation to the airport; as well as a full rollout of more remote terminals.
- We recommend that Massport indicate in this plan that it will prioritize investments that reduce overall transportation emissions and accelerate electrification of ground service equipment and vehicle fleets in accordance with Massport’s 2017 agreement with CLF.

#### **4. Maritime Operations and the Port of Boston**

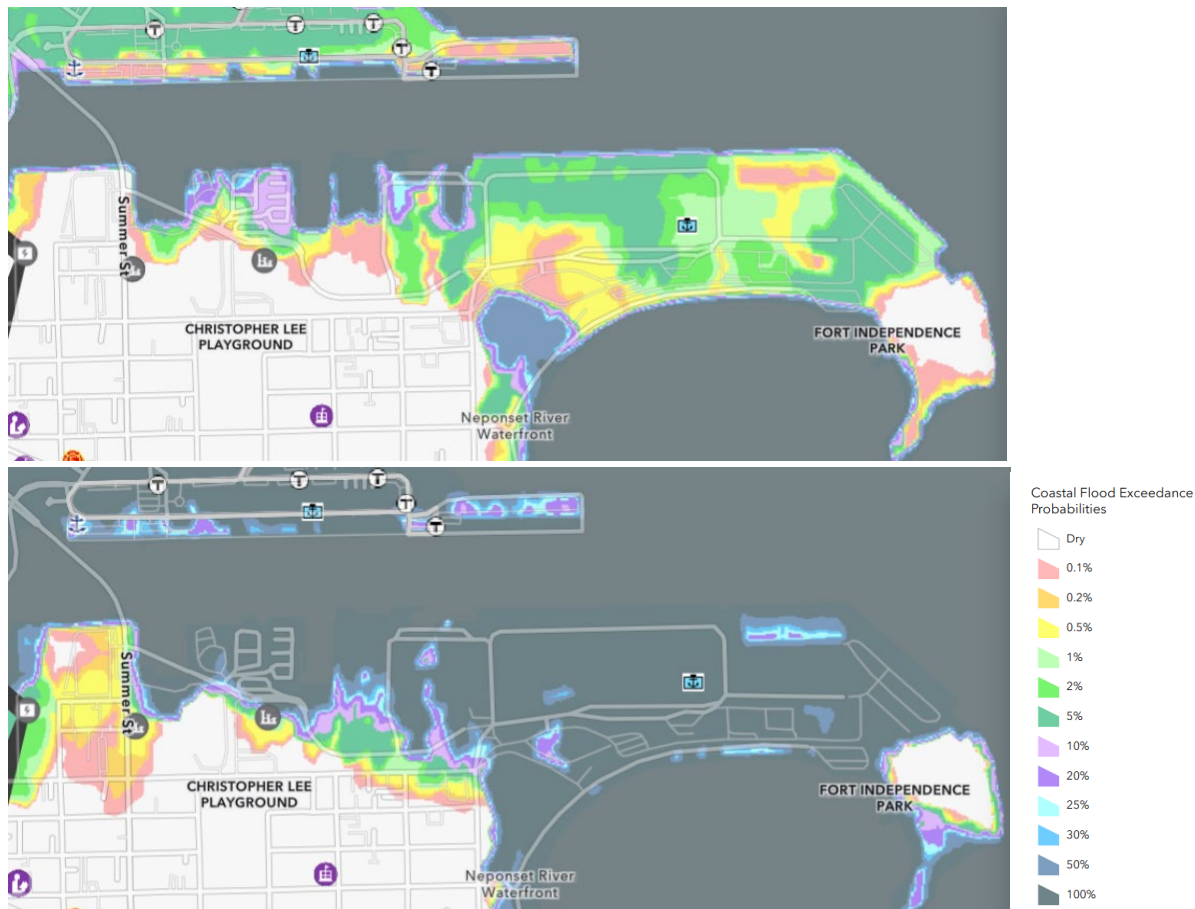
Massport should prioritize adaptation and resiliency measures that safeguard the Port of Boston and the broader South Boston neighborhood from predictable climate impacts, including sea level rise and intensifying storms. The agency should also support port operators and residents in East Boston, Charlestown, and Chelsea by activating underutilized and vacant parcels for modern uses that deliver public benefits. Massport-owned parcels within Designated Port Areas (“DPAs”) must function as good neighbors, enabling surrounding communities and businesses to flourish through quality job opportunities, workforce development, tax contributions, progress toward shared coastal resilience goals, and meaningful efforts to address the cumulative harms of historic polluting industries. All port expansions and operations should align with Massachusetts’ climate mandates and coastal resilience priorities. In addition, Massport should accelerate shore power installation at Flynn Cruiseport Boston and begin installation at Conley Terminal to eliminate ship idling emissions and significantly reduce community exposure to diesel pollution.

#### **5. Climate Adaptation and Resiliency**

We encourage Massport to release concrete, district-scale resilience, and climate adaptation strategies that prioritize nature-based solutions. While we appreciate Massport’s plan to develop “larger, district-scale solutions that protect both Massport assets and surrounding neighborhoods,” these commitments must be measurable, timely, and collaborative. Massport should release these plans to the public and facilitate public hearings to incorporate community priorities. We also encourage Massport to continue collaborating with the United States Army Corps of Engineers on

the Boston Coastal Storm Risk Study to work towards a final alignment that improves the resilience of the Chelsea Creek and South Boston DPAs to the greatest extent possible.

DPAs should include climate-adaptive infrastructure to ensure long-term viability and protect surrounding communities. Any viable future for DPAs must account for sea-level rise, coastal and stormwater flooding, precipitation, and extreme heat. We recommend that Massport model to the 2070 1% storm (bottom chart) rather than the 2030 0.2% storm (top chart), as this appears to be the more conservative estimate when comparing maps from [CZM's Coastal Flood Risk tool](#). A similar approach should also be developed with respect to Massport's land holdings in the Chelsea Creek DPA. We encourage Massport to prioritize adaptation and resiliency measures that protect their assets—particularly their coastal assets—against predictable climate impacts.



Finally, Massport must address the health and safety impacts of extreme heat. According to the most recent data from the ResilientMass Climate Change Projections Dashboard, Boston can expect an additional 39 days above 90 degrees, Fahrenheit, by 2070. Port and airport operations necessitate outdoor work; accordingly, extreme heat must be mitigated, as it could prove dangerous or even fatal to workers.

## 6. Strategic Plan in the Context of Other Planning Tools

Lastly, we would appreciate if Massport could comment on the difference between a strategic plan and an airport master plan—and how Massport can utilize both approaches to achieve

its goals. Public input and community involvement play a role in both, but there is more federal guidance and regulation around the development and implementation of an airport master plan, as well as requirements for assessing community impacts. Massport should comment on how a strategic plan achieves those same objectives with equivalent public/community participation – something has been lacking in the process of developing this strategic plan. Additionally, we are aware that Massport is required to report its impacts through the Environmental Status and Planning Reports, Environmental Data Reports, as well as individual Massachusetts Environmental Policy Act project processes. Finding a way to integrate these various planning and reporting tools (including how they relate to and impact the strategic plan or airport master plan) would help the public better understand the full picture of Massport planning, decision making, and reporting – as well as the role that the public can play in shaping those outcomes.

## **Conclusion**

CLF appreciated the opportunity to comment on this plan and looks forward to understanding more about how Massport intends to incorporate feedback. We hope to see additional opportunities for community involvement, as well as plan development transparency, as Massport continues to work on this.

In sum, CLF urges Massport to revise its 2025 Strategic Plan to include the above recommendations to achieve:

- Specific and measurable environmental commitments;
- Meaningful community outreach and engagement;
- Environmental monitoring and associated mitigation for EJ communities;
- Adherence to existing commitments, including the 2017 Massport-CLF Agreement; and
- Transparent implementation timelines and accountability measures.

We look forward to working collaboratively with Massport to ensure that the 2025 Strategic Plan serves as a model for sustainable long-term planning that protects both the environment and the health of surrounding communities.

Paulina Muratore  
Director of Transportation Justice and Infrastructure  
Conservation Law Foundation

Jonathan Mishara  
Senior Fellow  
Conservation Law Foundation

# Hanscom Field Advisory Commission

March 3, 2026

Flavio Leo  
Director Aviation Planning & Strategy  
Massport  
One Harborside Drive  
Boston, MA 02128

Dear Mr. Leo,

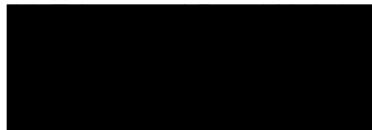
We appreciated your taking the time to present Massport's 2025 Strategic Plan at the January 20, 2026, meeting of the Hanscom Field Advisory Commission (HFAC). During that meeting we raised several questions, and in our February meeting, HFAC members discussed the concerns enumerated below:

1. **Defining Massport's mission, vision and strategic objectives** (slide 6) The overall mission of Massport is stated as "Connecting MA to the world and moving the region forward." A mission statement is necessarily vague, but the idea of "moving forward" is particularly vulnerable to different interpretations. We believe any progress cannot be just economic progress but also the need for stronger progress in the environmental and human rights concerns raised by HFAC and community members.
2. **Guiding Principles-Ambitious** (slide 8) We hope the ambition and sensitivity to trends can be directed towards research and development that is realistic and that rejects the twentieth century notion that all growth is good. In defining Massport's ambition, we think you should look not just at the activities for which you have 100% responsibility but also look for ways to help facility users do better.
3. **Guiding Principles-Collaborative** (slide 8). We appreciate the commitment to engaging external stakeholders and considering the needs of surrounding communities. We recognize and appreciate that Massport representatives attend and attempt to answer questions from the community during HFAC meetings. We would like to see in the next phase of the strategic plan specific initiatives that go beyond "just listening" to the community to making actual progress in addressing our concerns.
4. **Massport Strategic Plan objective:** "Plan for managing growth and economic impact." HFAC rejects the assumption that growth is necessary or desirable. Certainly, from the perspective of the community, any increase in operations will be tied to more noise, pollution, and global greenhouse gases.
5. **Aspirational slogans:** (slide 18). "Being a good neighbor is our responsibility." There are opportunities to make this more concrete. HFAC members and citizen participants in our calls are particularly concerned by the use of Hanscom Field by the Department of Homeland Security to move immigrants around, some of whose legal status has not been carefully ascertained. Massport can do better by aiming to be transparent about the operations occurring there and demanding accurate information from federal agencies using the field.

6. **Hanscom Strategic Priority Areas-SAF** (slide 16) One of the strategic priorities is to support the development & adoption of sustainable aviation fuel while advancing Massport's net-zero goals. HFAC members care deeply about the goal of advancing towards net-zero but believe the science proving the viability of SAF as a way to address climate change is not there (in the near term). Doing more research is fine but it should not be the centerpiece of any serious strategic plan towards less impactful aviation.
7. **Observations: Hanscom:** (slide 12). HFAC has repeatedly complained to Massport about the use of the term “business jets.” This usage implicitly suggests that these jets are a necessary part of promoting the success of regional business. In fact, we can see that a significant number of trips made by these jets are to vacation spots like Jackson Hole and Nantucket. We would like to see Massport adopt the more neutral term “private jet” as an acknowledgement that private jets like commercial jets are used by people for many purposes.
8. **Economic Impact:** (slide 4). Can you confirm that the \$22 billion and 107,000 direct jobs associated with Massport facilities do not include activity associated with Hanscom Airforce base? In some Massport presentations, contributions from the AFB have been mistakenly included in estimating economic impact.
9. **Stakeholder perspective:** We think the plan would be improved by defining who your stakeholders are. This would include customers who use the services offered at Massport facilities, but also a constellation of other groups and individuals—employees, vendors providing services, and so on. Because these stakeholders may have different priorities than the communities HFAC represents (also stakeholders), identifying who they are and what the challenges might be in reconciling their priorities would be helpful in interpreting Massport’s mission, vision, and strategic objectives
10. **For future inclusion in strategic initiatives:** We hope in the next phase of the strategic plan, Massport will include:
  - a. Initiatives to continue to improve public transportation to and from Massport facilities (including Hanscom)
  - b. Initiatives to encourage the growth of electric aviation as opportunities arise as alternatives for some short-hop flights

Again, we appreciate your taking the time to present to us and to give thought to the concerns and feedback we are presenting here.

Sincerely,  
Margaret Coppe  
Chair  
Hanscom Field Advisory Commission



Cc: HFAC Committee  
Amber Goodspeed, Hanscom Manager, [agoodspeed@massport.com](mailto:agoodspeed@massport.com)  
Aaron Toffler, Massport Community Advisory Commission, [atoffer@massportcac.org](mailto:atoffer@massportcac.org)  
Senator Elizabeth Warren, [press@warren.senate.gov](mailto:press@warren.senate.gov)  
Senator Ed Markey, [liam.horsman@markey.senate.gov](mailto:liam.horsman@markey.senate.gov)  
Congresswoman Katherine M. Clark [MA05KCIMA@mail.house.gov](mailto:MA05KCIMA@mail.house.gov)

Congresswoman Lori Trahan, [ReplonTrahan@mail.house.gov](mailto:ReplonTrahan@mail.house.gov)  
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Representative Ken Gordon, [ken.gordon@mahouse.gov](mailto:ken.gordon@mahouse.gov)  
Representative Thomas Stanley, [thomas.stanley@mahouse.gov](mailto:thomas.stanley@mahouse.gov)  
Representative Michelle Ciccolo, [michelle.ciccolo@mahouse.gov](mailto:michelle.ciccolo@mahouse.gov)  
Hanscom Area Towns Committee, Chair Mark Sandeen, [msandeen@lexingtonma.gov](mailto:msandeen@lexingtonma.gov)

Massport Authority  
one Harborside Dr.  
East Boston, Ma. 02128  
Attn: Strategic Business & Planning Dept.

FEB. 25 , 2026

DEAR Sir;

MASSPORT AUTHORITY SHOULD NOT VOTE ON NEW SIGNAGE FOR  
BOSTON LOGAN INTERNATIONAL AIRPORT .

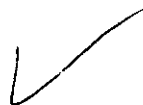
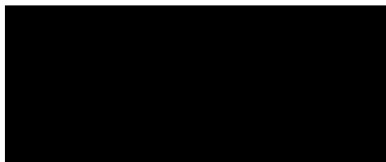
I WOULD RECOMMEND YOU AND MASSPORT AUTHORITY SHOULD  
CONSIDER USE THE SIGNAGE :

“ WELCOME BOSTON LOGAN INTERNATIONAL AIRPORT “

“ THANK YOU FOR VISIT BOSTON - COME BACK AGAIN SOON “

SINCERELY,

  
JOHN S. [redacted]



MASSPORT AUTHORITY  
ONE HARBORSIDE DR.  
EAST BOSTON, MA. 02128  
ATTN: STRATEGIC BUSINESS & PLANNING DEPT.

---

FEB. 22, 2026

DEAR SIR :

I SUPPORT PROPOSED AIRFIELD DEVELOPMENT AT THE FORMER RAYTHEON HANGAR SITE ON MASSPORT PROPERTY IN BEDFORD FOR ECONOMY DEVELOPMENT.

I WOULD RECOMMEND MASSPORT AND HANSCOM AFB SHOULD DEVELOP BUILD NOISE BUFFER ZONE FENCE AROUND THE AIRFIELD AND THIS NEW TECHNOLOGY SHOULD HELP CUT DOWN NOISE FOR PEOPLE WHO LIVE NEAR THE AIRPORT .

SAME THIONG : THIS BUFFER NOISE FENCES TO BUILD HIGHWAYS TO REDUCE NOISE TO THOSE RESIDENTS WHO LIVE NEAR ON HIGHWAYS . THIS HELPS CUT DOWN NOISES FOR RESIDENTS WHO LIVE NEAR HOMES ( BUILD NOISE BARRIERS ) ON NEAR HIGHWAYS AND NEAR AIRPORTS ) . THIS TECHNOLOGY WILL HELP CUT DOWN ON NOISE TO RESIDENTS WHO LIVE NEAR AIRPORTS.

THIS IS THE NEW WAVE FOR NEW TECHNOLOGY FOR FUTURE NOISE REDUCTION PROJECTS FOR RESIDENTS WHO LIVE NEAR AIRPORTS AND NEAR HIGHWAYS . THIS IS A GOOD STRATEGY FOR THE FUTURE.

THANK YOU FOR YOUR CONSIDERATION ON THIS IMPORTANT ISSUE.

SINCERELY,

A handwritten signature in black ink, appearing to be 'John S. [redacted]', written in a cursive style. The signature is positioned above the printed name 'JOHN S' and a black redaction box.

JOHN S [REDACTED]

# The Boston Globe

OPINION

## New England needs a regional airport system

**Logan, T.F. Green, and Manchester airports could operate cooperatively to serve the needs of the region.**

By John Vitagliano Updated August 25, 2025



Escalator

riders were silhouetted as others walked by in Terminal E at Logan International Airport in 2024. Andrew Burke-Stevenson for The Boston Globe

*John Vitagliano is a former 14-year member of the Massport board and former Boston Transportation Commissioner.*

Rhode Island's T.F. Green Airport recently won Travel + Leisure Magazine's prestigious "[Best Airport in America](#)" award, with one voter writing it was "easy to get to, easy to park, [and] easy to navigate." Perhaps it's time to consider the development of a regional airport system. Three airports — Boston's Logan Airport, T.F. Green, and New Hampshire's Manchester Airport — could operate cooperatively to serve the air transportation requirements of the region, without overburdening any individual airport.

The three airports currently operate independently and competitively, with air service policies influenced by the financial bottom lines of each airport rather than by the objective transportation needs of the region. Logan [is bursting at the seams](#), with airside and groundside systems often operating at and beyond peak capacity.

In fiscal 2025, Logan served 44 million passengers, a 5 percent increase over fiscal 2024 and the highest ever. The consequential environmental impacts are severe; Logan generates 15 *tons* of harmful pollutants daily, much of it impacting the airport's environmental justice community abutters. The airport noise levels significantly affect the quality-of-life of thousands of local residents.

A feasible model for the organization could be the New York-New Jersey Port Authority Compact of 1921, which successfully operates three major regional airports (John F. Kennedy International, Newark Liberty International, and LaGuardia) as well as two smaller general aviation airports. The governance of the authority consists of six commissioners from each state. A comparable approach would work for a New England regional airport system, based on appropriate representation from the three participating states.

The creation of such a unified regional airport system would require bold political leadership from the three states, with Massachusetts taking the lead, primarily because the partnership would relieve overdependence on Logan and Massachusetts would benefit from its enhanced efficiency. Logan's proximity to Boston's central business district was once considered essential to the local economy, but that concept has been largely discarded.

For example, the former Denver airport at Stapleton Field was located only 3 miles from downtown, long viewed as a significant factor in Denver's rapid economic growth. But, as with Logan, that very proximity became a source of intense community [environmental impacts](#) and congested ground transportation systems, to the point where additional airport expansion to accommodate increased air travel demand was infeasible. By the 1980s plans were underway to replace Stapleton.

The Colorado General Assembly initiated a plan to identify and acquire a site to construct a new airport in 1985, culminating in the opening of Denver International Airport in 1995. Stapleton was decommissioned. Denver's airport is now located 23 miles from downtown but connected with highway and rail transit, and Denver's economy has continued to thrive.

[The success of the Denver experience](#) bodes well for a New England regional airport system, not because of the availability of 34,000 acres to construct a new airport from scratch (there isn't) but because of the availability of a suitable alternative to today's overburdened Logan Airport in the form of Green and Manchester airports to function not just as reliever airports for Logan but also as primary airports in their own right.

As Denver and other new airports have demonstrated, transit connectivity to downtown is necessary for effective operations. T.F. Green is currently served by MBTA commuter rail to either Providence or Boston. Manchester Airport is easily accessible to Boston's North Shore communities while Green is convenient to Boston's South Shore communities. Both airports are connected to Boston by intercity bus and trains. A regional airport system would provide the basis for significant enhancement of all transit connectivity modes. Massport's commendable efforts to optimize Worcester Airport's air service potential have

clearly demonstrated that Worcester is best suited as a general aviation airport, due to airside and groundside constraints.

Major airlines such as United and Delta are predicting continued future growth at Logan, and Massport's own 10- to 15-year future planning horizon data for Logan predict a 48 percent increase in passengers and a 31 percent increase in flights, all through today's extremely limited facilities. A worrisome thought.

New England and Greater Boston's economic reliance on Logan Airport is economically constraining and environmentally pernicious. New Hampshire, Rhode Island, and Massachusetts should join forces to create a regional air transportation system.



**GABRIELA COLETTA ZAPATA  
DISTRICT 1 BOSTON CITY COUNCILOR**

March 6, 2025

Rich Davey, Chief Executive Officer  
Massachusetts Port Authority  
One Harborside Drive, Suite 200S  
East Boston, Massachusetts 02128

**Re: Comments on the Draft 2025 Massport Strategic Plan**

Dear Mr. Davey,

I write to provide comments on the Massachusetts Port Authority's Draft 2025 Strategic Plan. I appreciate Massport's effort to establish a long-term vision that prioritizes economic growth, customer experience, sustainability, and community engagement. Logan International Airport and Massport's maritime facilities are critical drivers of regional connectivity and economic activity, but the communities surrounding these assets also bear the direct and cumulative impacts of their operations.

For East Boston in particular, designated as an Environmental Justice community, airport activity has long been associated with elevated exposure to air pollution, aircraft noise, roadway congestion, and related public health risks. East Boston residents experience some of the highest asthma hospitalization rates in Massachusetts, a reality that must remain central to any conversation about the future growth of Logan Airport. As the Strategic Plan contemplates major infrastructure investments and operational changes over the next decade, it is essential that community health and environmental protections are treated as foundational elements of implementation rather than secondary considerations.

The Strategic Plan outlines significant initiatives intended to accommodate growing passenger demand and modernize Logan Airport, including remote terminals with bus connections to the airport, reconstruction of the core of Terminals B and C, additional gates at Terminal E, and

modernization of the airfield and air traffic control tower. While these initiatives may improve operational efficiency and passenger experience, they also raise important questions about the long-term trajectory of airport activity and the cumulative impacts on surrounding communities. Mitigation strategies must do more than keep pace with growth, they must result in measurable reductions in pollution, noise, and traffic burdens for residents.

Ground transportation remains one of the most significant sources of environmental impact associated with Logan Airport. Proposed curb congestion management policies, expanded Logan Express service, and improved transit connectivity must be implemented in close coordination with the City of Boston to ensure that traffic is not displaced onto neighborhood streets in East Boston and the North End.

As Massport plans for the future of Logan Airport, it is also critical to recognize the workers who keep the airport operating every day. Thousands of airport workers, including many residents of District 1, work in aviation services, hospitality, transportation, and logistics across the airport and maritime facilities. In the past, airport workers have raised concerns about the need for stronger workforce training opportunities and wages that allow workers to support themselves and their families. As Massport advances modernization and operational changes, the Strategic Plan should prioritize workforce development, quality job standards, and pathways to livable wages so that the economic benefits of airport growth are shared with the workers and communities who make these operations possible.

Massport plays an essential role in the economic vitality of the Commonwealth, but that role must be balanced with a responsibility to protect both the communities and workers who are most affected by its operations. As the Strategic Plan moves toward adoption and implementation, I urge Massport to ensure that future investments are paired with clear commitments to reduce environmental impacts, strengthen community protections, and support the airport workforce that powers this critical regional asset. Thank you for the opportunity to comment on the Draft Strategic Plan. I look forward to continued engagement and partnership as this work moves forward.

Sincerely,

A handwritten signature in black ink that reads "Gabriela Coletta Zapata". The signature is written in a cursive style and is positioned above the typed name.

Gabriela Coletta Zapata  
Boston City Councilor, District 1

CC:

The Honorable Mayor Michelle Wu

The Honorable Senator Lydia Edwards

The Honorable Representative Adrian Madaro

Alaina Coppola, Director, Community Relations & Government Affairs

Anthony Guerrero, Deputy Director, Community Relations and Federal Affairs

## Advisory Board

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Walden Woods Project & Thoreau  
Institute

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Environmentalist

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Ralph Waldo Emerson Society,  
Professor, Worcester Polytechnic  
Institute

Nicola D. Tsongas, Former U.S. MA  
Representative

## Executive Director

Anna West Winter



# Save Our Heritage

Protecting the birthplace of the American Revolution,  
the cradle of the American Environmental Movement,  
and the home of the American Literary Renaissance.

Feb 20, 2026

Re: Comments on 2025 Massport Strategic Plan

## Introduction

Save Our Heritage appreciates the opportunity to comment on Massport's Draft Strategic Plan, specifically for Hanscom Field. While we support thoughtful planning for the region's transportation infrastructure, we have significant concerns about the accuracy, completeness, and underlying assumptions of the Hanscom Field portion of this plan. Our comments address fundamental issues with how the plan characterizes airport operations, environmental impacts, economic benefits, and Massport's public mission.

## 1. Innovation Hub Emphasis Is Welcome

We support the plan's emphasis on Hanscom as an innovation hub. The recent placement of a company developing automated aviation technology is a constructive use of the facility that aligns with the region's R&D strengths. We encourage Massport to prioritize such uses, particularly companies working to reduce the environmental impacts of aviation.

## 2. Misleading Characterization of Private Jet Operations

The Strategic Plan repeatedly refers to jet operations as "business aviation" and aircraft as "business jets." This terminology is misleading and appears designed to create an impression of economic necessity that does not reflect reality.

The primary use of private jets at Hanscom is luxury travel to vacation and resort destinations by wealthy individuals. Flight tracking data consistently shows that top destinations include Nantucket, Martha's Vineyard, Florida resort communities, Caribbean islands, and ski destinations. These are not business trips; they are discretionary luxury travel by a small number of very affluent people who choose private aviation for convenience, comfort, and status.

The plan implies that private jet operations are essential to the surrounding innovation economy, describing Hanscom as "a linchpin for the surrounding R&D and innovation economy" that provides "critical services to its surrounding R&D neighbors." No evidence has ever been

offered by Massport or regional businesses to support these claims or to suggest that the innovation economy benefits from private jet flights. These assertions appear designed to borrow legitimacy from the region's genuine economic strengths without establishing any causal connection.

We request that Massport use accurate terminology throughout the Strategic Plan. These aircraft should be referred to as "private luxury jets" and operations should be described as "private aviation" rather than "business aviation." Honest characterization is essential for the public to understand what activities Massport is facilitating and at what cost to surrounding communities.

### **3. Misleading Environmental Claims**

The Strategic Plan presents Hanscom as an environmental leader while ignoring the dominant source of its environmental impact: aircraft emissions.

#### **The Plan Focuses Only on Ground Emissions**

The sustainability initiatives highlighted in the plan address only ground-based sources: Net Zero ground support equipment conversion, electric vehicle charging infrastructure, solar energy generation, and building energy efficiency. While these are positive steps, they are marginal improvements that ignore the elephant in the room.

Aircraft emissions dwarf all ground-based emissions combined. By focusing exclusively on ground operations, Massport claims environmental leadership while facilitating explosive growth in the airport's actual carbon footprint.

#### **The Plan Obscures Dramatic Jet Growth**

The plan presents Hanscom's operations growth as modest (+5% over a decade), but this figure conceals a dramatic transformation in the type of operations. Propeller aircraft operations—which have relatively low environmental impact—are declining, while luxury jet operations are surging. Jet operations at Hanscom increased 66% from 2019 to 2023 alone. Jets now represent nearly half of all operations, up from approximately one-third.

This shift matters enormously because jets burn 10 to 20 times more fuel than propeller aircraft. Even with flat total operations, emissions are rising dramatically. The 5% growth figure is misleading; actual emissions growth is far higher due to the changing aircraft mix. Similarly, community noise impacts are worsening because jets are significantly louder than propeller aircraft.

The plan cherry-picks the one metric that looks benign while omitting the metrics that reveal the true impact. The plan's silence on this transition, and its emissions consequences, is a significant omission that undermines claims of environmental responsibility.

### **4. Vague and Unenforceable SAF Commitments**

The Strategic Plan states that Massport will "promote sustainable fuel opportunities" and "support the development and adoption of sustainable aviation fuel." These statements are vague and misleading.

### **No concrete actions or accountability**

The plan identifies no specific steps Massport will take. There are no targets, no timelines, no mandates, no defined incentive programs, and no metrics for measuring success. Without defined goals, actions, or accountability measures, words like 'encourage' and 'promote' express vague intentions regarding SAF and cannot be considered a credible plan. This approach fits a pattern that researchers have termed 'future soothing'—projecting technological salvation into a perpetually deferred future to ease public concern and postpone accountability. The aviation industry has employed this strategy since the mid-1990s, with promised solutions continually receding into the future.

### **No leverage and no SAF availability**

Private jet operators can fuel wherever they choose, have no obligation to use SAF, face no penalties for using conventional fuel, and will rationally choose the cheapest option. Massport cannot "encourage" adoption of fuel that is not present, and the plan includes no commitment to make SAF available.

### **Available SAF offers limited environmental benefit**

Not all SAF is equal. Feedstock-based SAF—the only type currently produced at any scale—offers modest lifecycle emissions reductions, perhaps 20-50% compared to conventional jet fuel. This is far from carbon neutral. The SAF with genuinely low emissions is e-fuel, produced using clean electricity to synthesize fuel from captured carbon and water. E-fuel production remains largely theoretical because it requires vast amounts of clean electricity that does not exist and will not exist at scale for the foreseeable future. Clean electricity that does become available will be needed for higher priorities: replacing fossil fuel power generation, electrifying transportation, and heating buildings. Diverting scarce clean electricity to produce jet fuel for luxury travel would be an extraordinarily poor use of a limited resource.

### **SAF production prospects are poor**

The plan's reliance on SAF ignores fundamental constraints on production. SAF currently represents approximately 0.1% of global jet fuel supply. Today's SAF is produced from feedstocks like used cooking oil and agricultural residues. These inputs are finite resources already in demand for other uses, severely limiting scalability. SAF costs remain 2-4x higher than conventional jet fuel, with no clear path to price parity. The recent report commissioned by Massport confirms this.<sup>1</sup> Future low-emission SAF is based on e-fuel, which is theoretical and has no current prospects to be produced by 2050; even if it were produced, e-fuel just for Massachusetts aviation would require more clean electricity than the total generation (all sources) of the Commonwealth today, and is projected to cost 4X fossil jet fuel. The recent Massport-commissioned report on SAF dismisses this source for the foreseeable future.<sup>1</sup>

## **5. The Plan Conflates Private Desire with Public Need**

The Strategic Plan states that Massport will "continue to meet metro Boston's General Aviation needs." This framing deserves scrutiny: what exactly is this "need," and why is Massport obligated to satisfy it?

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<sup>1</sup> *Massachusetts and New England Sustainable Aviation Fuel Study*, NLR, 2026, commissioned by Massport

The "need" being served is not a public need. It is a private desire for convenience, luxury, and status by a tiny fraction of the population—less than 0.1% of metro Boston residents—who impose a disproportionate climate burden on everyone else. The plan treats wealthy people's preferences as equivalent to genuine public transportation needs.

Moreover, the plan treats growth in private jet travel as an external force that Massport must accommodate. This inverts reality. Convenient regional airport infrastructure induces demand, just as adding highways induces more driving and building parking garages induces more car trips. Hanscom's availability and amenities encourage private jet travel that would not otherwise occur. Massport is not passively responding to demand; it is actively generating it.

Massport is a public authority chartered to serve the public good. Yet this plan prioritizes the convenience of the wealthy few, imposes environmental and health costs on surrounding communities, generates emissions that harm everyone, and uses public resources and authority to facilitate luxury consumption.

The Strategic Plan should answer a fundamental question: why should a public authority facilitate luxury travel that benefits a tiny elite while imposing noise, pollution, and climate costs on the broader public? This is not "meeting a need"; it is subsidizing the most carbon-intensive form of travel for the benefit of the few at the expense of the many.

## **Conclusion**

The Hanscom Field Strategic Plan presents a vision of innovation and environmental leadership that does not withstand scrutiny. The plan mischaracterizes private luxury travel as "business aviation," ignores aircraft emissions while touting marginal ground-level improvements, offers only vague and unenforceable commitments on sustainable fuel, and treats the most carbon-intensive form of travel, used by a few wealthy individuals, as a public need.

We urge Massport to revise the Strategic Plan to provide honest characterization of airport operations and users, comprehensive environmental accounting that includes aircraft emissions, concrete and enforceable sustainability commitments, and a clear explanation of how facilitating luxury travel serves Massport's public mission.

The surrounding communities deserve a strategic plan that honestly addresses the impacts they bear and genuinely prioritizes the public interest over the convenience of the privileged few.

Sincerely



Neil Rasmussen

President, Save Our Heritage



SENATOR CYNTHIA STONE CREEM  
MAJORITY LEADER  
Norfolk and Middlesex District

The Commonwealth of Massachusetts  
MASSACHUSETTS SENATE  
OFFICE OF THE MAJORITY LEADER

STATE HOUSE, ROOM 312A  
BOSTON, MA 02133-1053  
TEL. (617) 722-1639  
FAX (617) 722-1266  
CYNTHIA.CREEM@MASENATE.GOV

March 2, 2026

Massachusetts Port Authority  
One Harborside Drive  
East Boston, MA 02128  
Attn: Strategic Business & Planning Department

To whom it may concern,

Thank you for providing the opportunity to comment on Massport's draft strategic plan.

My constituents are deeply concerned about the well-being of immigrants in Massachusetts. They are eager to advance a narrative that emphasizes the contributions that immigrants make to our communities and to our economy, and they believe that Massport's strategic plan represents an opportunity to do just that. I share both my constituents' concerns and their desire to tout the contributions of immigrants in the Commonwealth.

Massport's draft strategic plan refers to Massachusetts as a hub for innovation in life sciences and other sectors where immigrants play an important role. It discusses local colleges and universities that support research, economic activity, and air travel, and which rely heavily on immigrant students, researchers, and faculty. The plan also details challenges and opportunities related to Massport's own workforce, which includes many dedicated and talented immigrants. On behalf of my constituents, I encourage Massport to highlight the contributions of immigrants in each of those areas of the strategic plan.

Thank you for your consideration of this letter, and please do not hesitate to contact me if you have additional questions.

Sincerely,

A handwritten signature in black ink that reads "Cynthia Stone Creem".

Cynthia Stone Creem  
State Senator  
Norfolk and Middlesex District



March 6, 2026

Via electronic mail: [community@massport.com](mailto:community@massport.com)

Massachusetts Port Authority  
One Harborside Drive  
East Boston, MA 02128  
Attn: Strategic Business & Planning Department

RE: Massport 2025 Strategic Plan

Dear Strategic Business & Planning Department:

Thank you for this opportunity to comment on the draft Massport 2025 Strategic Plan (Plan).

The American City Coalition (TACC) is a 501(c)(3) nonprofit organization based in Roxbury's Nubian Square. We tackle community-identified barriers through economic and workforce development, research, and policy strategies that expand pathways to meaningful opportunities in Roxbury and other communities of color.

TACC submitted a shared comment letter with members of the Boston Waterfront Partners (Boston Harbor Women of Color Coalition, Conservation Law Foundation, Mystic River Watershed Association, and Save the Harbor Save the Bay).

We are writing to share one additional comment on the draft Plan.

On page 43, the Plan states: "The next generation of development for Massport is along Summer Street between D Street and the Reserved Channel. Establishing a plan for an effective transportation framework in the area is essential."

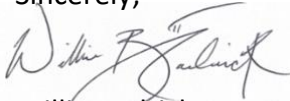
As Massport develops this transportation framework, it should explicitly consider connectivity to inland Environmental Justice neighborhoods, including Roxbury, to ensure that residents can equitably benefit from Massport's future investments through improved access to jobs and placemaking opportunities.

There is a clear need for new transit options that reduce travel times between Roxbury and the Reserved Channel. Specifically, TACC encourages Massport to explore a dedicated shuttle or bus route connecting Nubian Square and the Reserved Channel. While the drive between these areas takes approximately 15 minutes, current public transit options require significantly longer travel times. Massport and its local transportation partners, including Seaport TMA, should prioritize improved connectivity to Roxbury and other inland neighborhoods, not just transportation services focused on South Station or within the South Boston Waterfront.

More broadly, Boston continues to face stark inequities between neighborhoods, including significant income disparities. The Plan should include additional details on how Massport will continue to develop and implement intentional strategies that ensure Environmental Justice communities equitably share in the Plan's benefits. This includes access to construction and permanent jobs, placemaking activities, small business opportunities, and public realm improvements.

Thank you again for allowing TACC to provide this comment letter. Please reach out if you have any questions or if we can be of any help. I can be reached at [willie\\_bodrick@tamcc.org](mailto:willie_bodrick@tamcc.org) or 857.308.3010.

Sincerely,

A handwritten signature in black ink, appearing to read "Willie Bodrick II". The signature is written in a cursive style with a large, stylized initial "W".

Willie Bodrick II  
President & CEO



**TRANSITMATTERS**



## Massport 2025 Draft Strategic Plan Comment

March 4, 2026

Massachusetts Port Authority, One Harborside Drive, East Boston, MA 02128

TransitMatters commends Massport for establishing sustainability, passenger experience, and reducing congestion as organizational priorities through its aims to reduce private vehicle trips to Logan Airport over the next 10 years. As the draft strategic plan outlines, the curbs at Logan's terminals are already sensitive to severe and frustrating congestion. Massport is right to recognize the need for modernized ground transportation options at Logan, as the airport will only grow in passenger demand over the next decade.

To achieve this, Massport must get more ambitious and specific about its plans to increase the use of high occupancy modes, specifically the MBTA Blue Line. The Blue Line's connection to Logan Airport is a great asset to the Boston area, but its potential is largely untapped because of low ridership. The rapid transit option is underutilized because shuttle connections between the station and terminals are unreliable, confusing, and more laborious than taking a private vehicle. As reported by Massport, only 2% of passengers use the Blue Line to get to the airport because of reliability and ease-of-use issues. What Massport needs is a firm plan to make getting to and from the airport using the Blue Line a reality.



In this strategic plan, Massport must commit to addressing the following shortfalls of its on-airport shuttle system:

1. **Reliability:** The Blue Line is so under-utilized as a means of reaching the airport because travelers and airport employees cannot afford such variability in travel time. Because shuttles are often bunched, passengers do not know if they will have to wait 1 minute or 8 minutes for a shuttle to arrive. Once they do get on a shuttle, riders are in the dark as to whether their bus will dwell for an inexplicably long amount of time at any stop along the way. As shown in analyzed Massport data, some of the shuttle service's most popular routes regularly deviate between 5 and 7 minutes in their travel time, or 20-30% of their total trip length. Uneven headways and unpredictable dwell patterns do not give travellers and employees the assurance that they will get to their terminal or job on time, causing it to be underutilized.
2. **Frequency:** Shuttle riders report feeling like they spend too much time at the curb, waiting for a bus. Whether Boston is experiencing extreme heat or extreme cold, the Blue Line will not be a realistic option for riders if they have to wait longer than they deem worth it.
3. **Legibility:** As it exists today, the on-airport shuttle system is confusing for most riders that don't use it habitually. The six different on-airport routes – plus routes that go off-airport – are difficult to understand for the average user, especially if they are already frustrated or distracted by the experience of air travel. Travelers also have issues finding where their shuttle stop is located – at the terminal curbs as well as the Blue Line station busway – because of a lack of signage and maps. Without consistent onboard announcements, riders also report having trouble knowing what stop the bus is arriving at, especially at night, making for an uneasy shuttle ride.  
  
Cumulatively, route complexity, insufficient wayfinding guidance, and lack of onboard

announcements create a barrier to entry for Logan airport users, causing them to choose private vehicles.

4. **Curb Access:** Bunching and curbs overloaded with dwelling shuttles causes many Massport buses to have to let off passengers far from the curb. This creates accessibility issues and makes the bus even more uncomfortable for passengers of all ages who may have to unload luggage down a steep drop and then walk to the curb.
5. **Bus Speed:** Massport's on-airport shuttles are driven at much slower speeds than similarly-designed buses driven by other operators. This makes for longer travel times and a frustrating rider experience, reducing the likelihood that employees and travelers will use the Blue Line and shuttles.

Improving shuttle connectivity to and from the Blue Line is one of the most pressing needs for Logan Airport if Massport would like to accomplish its goals for better customer experience, reduced congestion, and decarbonization. The World Cup this summer provides additional incentive to make Logan more accessible by Blue Line – to meet the influx of international travelers it will bring and to satisfy the expectation of a higher level of rapid transit connectivity that many will have. The next decade of Massport's leadership must be one in which the Blue Line becomes a legitimate part of Logan Airport's ground access plan.

Yours sincerely,



Cole Lewis  
Program Manager, Bus and Mobility Hubs  
On behalf of TransitMatters  
[clewis@transitmatters.org](mailto:clewis@transitmatters.org)



Conservation  
Law Foundation



**BOSTON HARBOR  
WOMEN OF COLOR**  
COALITION



March 6, 2026

*Via electronic mail:* community@massport.com

Massachusetts Port Authority  
One Harborside Drive  
East Boston, MA 02128  
Attn: Strategic Business & Planning Department

RE: Massport 2025 Strategic Plan

Dear Strategic Business & Planning Department:

Thank you for this opportunity to comment on the draft Massport 2025 Strategic Plan (“Plan”). The undersigned organizations (Conservation Law Foundation, Boston Harbor Women of Color Coalition, Mystic River Watershed Association, Save the Harbor Save the Bay, and The American City Coalition) are waterfront stakeholders who currently live, work, recreate, and/or program in and around the Boston Harbor. Together, we bring local, statewide, and regional expertise on waterfront planning and development issues as well as community engagement, equity, and climate resilience. Our work seeks to strengthen and improve access to our waterfronts and improve the character and sustainability of our working waterfronts.

Our comments today reflect substantive considerations pertaining to the Plan’s discussion of the working waterfront, land activation, and climate resilience, as well as comments about the public process surrounding the Plan’s release. They are further shaped by the [BWP Equity Rubric for Waterfront Development](#) (“Equity Rubric”), a framework to better evaluate the ways existing and proposed plans and projects along the Greater Boston waterfront are or are not furthering racial and socioeconomic equity. We encourage Massport to support this vision for an accessible, resilient, and economically inclusive waterfront.

I. Working Waterfront

As a major waterfront landowner, Massport plays a critical role in the success of Designated Port Areas (“DPAs”). Massachusetts’ working ports are a non-renewable, statewide resource, and Boston Harbor in particular is a cornerstone of their economic opportunity. DPAs not only support water-dependent manufacturing, shipping, and commerce—they also provide opportunities for transportation, food security, workforce development, and utility resilience. Ensuring the long-term success of the DPAs requires coordinated efforts to maintain seaside infrastructure, landside infrastructure, and coastal resilience.

DPA should advance statewide climate, energy, and economic goals by blending innovative blue economy industries with traditional water-dependent industrial uses, creating a dynamic business eco-system while addressing environmental justice issues, expanding equitable access, and improving climate resilience. DPAs must be good neighbors that allow people and businesses near them to flourish by providing job opportunities, workforce development, and tax benefits; advancing community-wide coastal resilience objectives; and addressing the cumulative impacts of historic polluting industries. Massport, along with their lessees, should embrace these principles of resilience and environmental justice in all their DPA operations and, to the best of their ability, collaborate with other DPA landholders toward district-scale solutions.

#### A. Climate Resilience

We understand that Massport has a separate resiliency plan to address sea level rise, extreme storm events, heavy precipitation, coastal flooding, and extreme heat. Nonetheless, it is surprising that resiliency and adaptation are not present in the Port of Boston section of the Plan.

The Port of Boston is a major economic asset to the Commonwealth of Massachusetts, with \$8.2 billion in economic impact. The Conley Container Terminal, in particular, is invaluable, as it supports 66,000 jobs and represents the only full-service container terminal in New England. To state it plainly, Massachusetts cannot afford to lose the Port of Boston, and more must be done to protect it from predictable climate impacts. Yet, the Port of Boston section of Massport's Plan is silent on the issue of climate adaptation and resiliency.

By 2070, large portions of Conley Terminal—including the container field—will be regularly inundated in an annual storm, with the majority of the site facing flood depths of five to ten feet in a 1% annual coastal flood event (ACFE).<sup>1</sup> Meanwhile, the entirety of Flynn Cruiseport will be regularly inundated in an annual storm, with flood depths of greater than ten feet in a 1% ACFE.<sup>2</sup>

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<sup>1</sup> See Image 1; Image 2.

<sup>2</sup> See Image 1; Image 2.

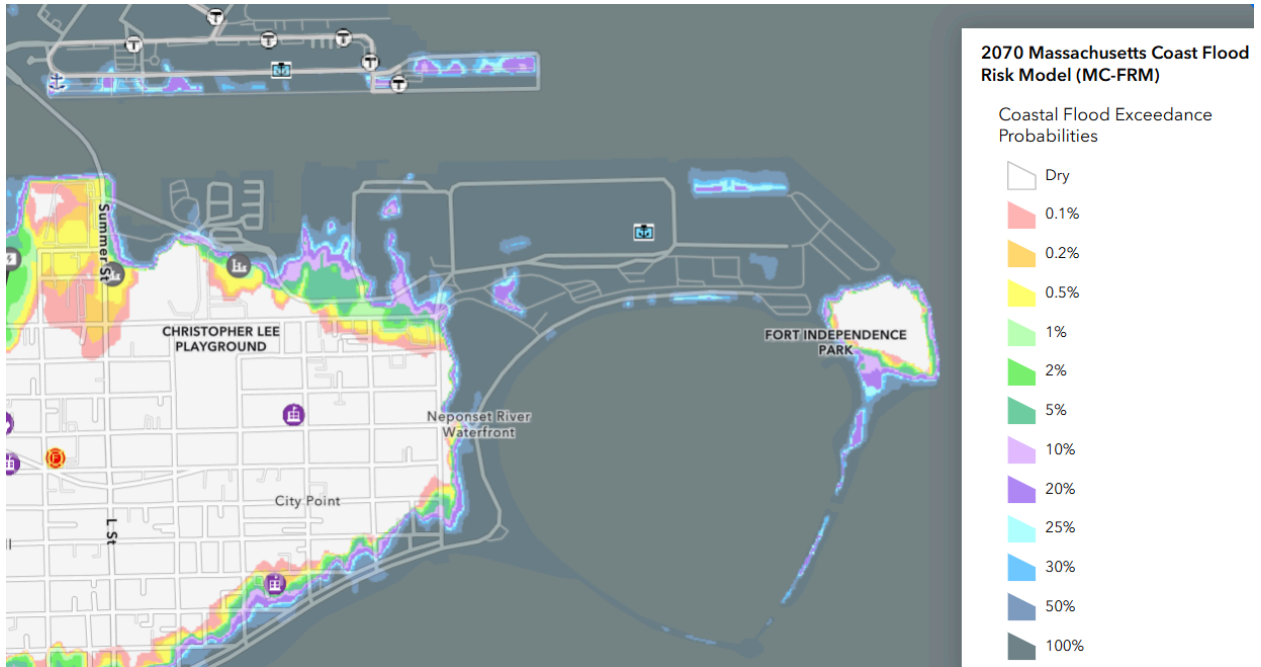


Image 1: Annual Coastal Flood Exceedance Probabilities in 2070. CZM, [“MA Coastal Flood Risk Model: Sea Level Rise and Coastal Flooding Viewer.”](#)

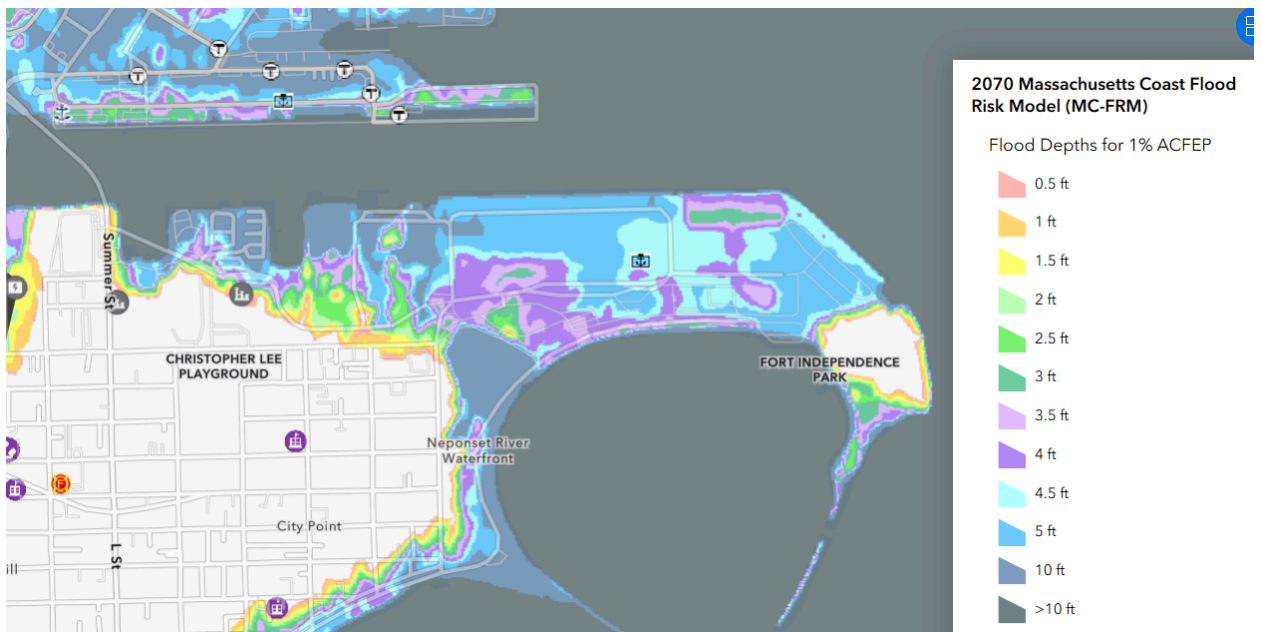


Image 2: Flood Depths for a 2070 1% Storm. CZM, [“MA Coastal Flood Risk Model: Sea Level Rise and Coastal Flooding Viewer.”](#)

The Port of Boston is at risk from other climate impacts as well, including extreme heat. According to the most recent data from the ResilientMass Climate Change Projections Dashboard, Boston can expect an additional 39 days above 90 degrees, Fahrenheit, by 2070. At the Port of Boston, where work necessarily must occur outside, this could prove dangerous or even fatal to workers.

DPA should include climate-adaptive infrastructure to ensure long-term viability and protect surrounding communities. Any viable future for DPAs must account for sea-level rise, coastal and stormwater flooding and extreme heat. Even in the context of the full Plan, adaptation and resiliency mostly appear in the context of decarbonization. While important, investments in decarbonization and energy efficiency will not matter if there is no port left on which to operate. In the Port of Boston section of the Plan, we encourage Massport to prioritize adaptation and resiliency measures that protect the Port of Boston and the broader South Boston neighborhood against predictable climate impacts.

## B. Chelsea Creek DPA

The Plan is silent on Massport’s waterfront holdings in East Boston, Chelsea, and Revere. The Chelsea Creek DPA—a hub of Massport’s airport support operations—is the only inner harbor DPA to suffer net job losses from 2017 to 2024.<sup>3</sup> Jobs in construction, manufacturing, retail, wholesale trade, and transportation and warehousing all declined during this period.<sup>4</sup> To secure the future of maritime industry in the Chelsea Creek DPA, Massport and its tenants should facilitate a long-term plan to enhance maritime infrastructure throughout their properties to support a diverse set of users.

The Chelsea Creek DPA is also at high risk of flooding, with flood depths expected to exceed 10ft in a 1% ACFE by 2070.<sup>5</sup> The City of Chelsea ranks in the 90th percentile statewide for exposure to respiratory hazards, traffic proximity, and hazardous waste proximity, largely due to intense truck traffic, poor air quality, exposure to unhealthy wastewater, and a lack of open space.<sup>6</sup> Massport’s operations throughout this corridor contribute to these cumulative health impacts. Just as port electrification, decarbonization, and climate resilience are essential for the Port of Boston, Massport must strive to reduce their emissions, mitigate pollution, and plan for district-scale resiliency throughout the Chelsea Creek DPA and its catchment area.

There is also great potential to improve public access throughout the Chelsea Creek DPA. Many of Massport’s operations in the Chelsea Creek DPA are not water-dependent industrial uses. Wherever the industrial nature of a site does not threaten pedestrian safety, Massport should pursue enhanced waterfront benefits such as pop-up parks. Massport should also explore connectivity to nearby community resources such as urban wilds, the Harborwalk, and the Mary Ellen Welch Greenway. Massport and its tenants must work with neighboring property owners, elected officials, community-based organizations, and community members to design and implement waterfront access opportunities.

## II. Land Activation and Programming

We, and the communities we work with, have experienced how lower-income populations and communities of color in our city “have not seen the same benefits from

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<sup>3</sup> Boston Waterfront Partners, “Strengthening The Urban Harbor: Policy & Investment Recommendations for Boston’s Working Ports” (January 2025) (“BWP DPA Report”) at p. 20.

<sup>4</sup> BWP DPA Report at p. 20.

<sup>5</sup> BWP DPA Report at p. 21.

<sup>6</sup> BWP DPA Report at p. 21.

waterfront investment compared to affluent white residents. Boston’s waterfront has remained largely unapproachable to environmental justice populations.”<sup>7</sup>

We are pleased to see a key goal for the REAM portfolio as laid out in the Plan is to “promote accessible and inclusive programming on its property.” We are also encouraged by the emphasis that the plan puts on placemaking programs, including the weekly Fish & Farm Market at the Boston Fish Pier, concerts, fitness and yoga classes, and public art installations. However, we would like to see more specificity outlined in the final Plan on the steps that Massport will take in ensuring placemaking activities are truly accessible and inclusive. This includes strategies to promote and increase accessibility of placemaking activities to those who do not live in the surrounding neighborhoods, such as “amenities that allow visitors to comfortably stay in the area. These may include public restrooms, drinking fountains with water bottle refills, trash and recycling bins, shade, grills, affordable food options, and other resident/community-identified amenities.”<sup>8</sup> Additionally, we would like to see REAM placemaking activities expanded beyond South Boston to properties in East Boston as well. To develop authentic local partnerships in East Boston for the expansion and promotion of these activities, Massport should consider joining the inaugural East Boston Cultural District.

We applaud Massport for recognizing the benefits of placemaking “including stronger asset performance, increased economic impact (job creation, small business growth); and community support by creating vibrant places offering novel and affordable activities,” and for activating undeveloped parcels accordingly. We ask Massport to clarify their plan for continuing these benefits of programming and engagement once the parcel is developed. In other words, will there be dedicated space allocated for placemaking in future land use decisions?

The Plan states that these placemaking programs have been well-received in the past, receiving “strong positive reviews from elected officials, participants and REAM ground lease tenants.” We have seen some of this positive reception first-hand, as well as an example of successful programming implementation as a result of Massport’s collaboration with community-based organizations, through the weekly summer Fish & Farm Market on the Fish Pier. However, to more effectively measure the impact of this programming, we recommend developing a plan to “capture metrics to understand demographic (who programs are serving) and participant feedback (the quality of their experience),”<sup>9</sup> Not only will this allow for Massport to better assess the impact and reach of programming, but will create measurable datasets to help demonstrate community need and demand for these programs as REAM explores additional revenue funds to support them. We encourage Massport to reach out to organizations that regularly program on the waterfront for additional support in expanded programming and placemaking.

### III. Public Process

Massport cannot achieve the Plan’s objectives alone. It must rely on the aligned actions of their water-dependent and nonwater-dependent lessees and subtenants in collaboration with regional, state, and local partner agencies, local businesses, nonprofits, advocacy groups,

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<sup>7</sup> Equity Rubric

<sup>8</sup> Equity Rubric

<sup>9</sup> Equity Rubric.

community groups, and local residents. We commend the Plan’s goal of retaining a community focus to support surrounding communities while recognizing environmental operational impacts, the importance of generating good jobs for residents, supporting local businesses and providing green spaces. We encourage Massport to define what the Strategic Plan means when it refers to “community” and identify the different strategies necessary to attract, engage, and empower communities, especially environmental justice populations. Transparently defining community and creating actionable strategies for community engagement will create a more equitable process and result.

We recommend Massport conduct additional public outreach opportunities related to this Plan beyond the February 5th public meeting. By utilizing a public engagement framework and format where people can come together to ask questions and share information, Massport creates the opportunity to receive initial feedback and set the foundation for collaboration. A webinar without enabled Q&A or Chat can convey a top-down approach that doesn’t value engagement or conversation with participants.

The Equity Rubric also acts as a guide to best practices for a thorough, inclusive, effective, and equitable public process. It offers recommendations for sharing resources, community engagement, meeting notices, meeting accommodations, and incorporating the community’s input into decision making. It stresses the importance of including frequently unrepresented voices in the formulation of outreach strategies and project priorities. By prioritizing equity and incorporating environmental justice principles into procedures and decisions, Massport can demonstrate that community input is both considered and valued. At this time, it is unclear how community members are being actively engaged when effectuating various projects and initiatives in the Plan.

We encourage Massport to extend the public comment period to the end of April, in coordination with expanded public outreach.

#### IV. Conclusion

Thank you for your consideration of these priorities and for your work to protect the Commonwealth’s waterfront. If you have any questions or if we may provide additional information, please don’t hesitate to contact Breanne Frank at [bfrank@clf.org](mailto:bfrank@clf.org).

Sincerely,

Boston Harbor Women of Color Coalition  
Conservation Law Foundation  
GreenRoots  
Mystic River Watershed Association  
Save the Harbor/Save the Bay  
The American City Coalition

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