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December 22, 2016

Secretary Matthew A. Beaton
Executive Office of Energy & Environmental Affairs
Attn: MEPA Office
Anne Canaday, EEA #15598
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: 115 Winthrop Square ENF (EEA #15610)

Dear Secretary Beaton:

On behalf of the Massachusetts Port Authority (Massport), thank you for the opportunity to submit comments on the Environmental Notification Form (ENF) filing for the 115 Winthrop Square Project. The Project seeks to build a 775 foot tall, 1.1-1.5 million sf mixed use building at 115 Winthrop Square in Boston. As stated in the ENF, the project exceeds a mandatory Environmental Impact Review (EIR) threshold and thus comments on this filing will be used in the development of the Draft EIR Scope.

Massport supports new development projects that strengthen our economy and provide employment opportunities to its residents. Our main aviation priority is to ensure aircraft are able to operate in a safe and efficient manner in and around Logan Airport. In that context, Massport strongly objects to the proposed tower height of 775 feet at the 115 Winthrop Square site. The proposed tower exceeds the height limit of 710 feet above mean sea level (AMSL) as defined by the *Boston- Logan International Airport Composite Map of Critical Airspace Surfaces* (Logan Airspace Map, attached). Note that the 710 AMSL limit will apply to the tallest point(s) of the proposed structure above sea level including mechanical units, antennas, etc. We have had initial discussions with the proponent and expect to continue the dialogue.

A building height greater than 710 feet MSL at the 115 Winthrop Square location would have the following impacts on Logan Airport operations:

- **Significantly impact Runway 27 Departures.** The proposed structure will penetrate the Federal Aviation Administration's (FAA) existing Runway 27 departure corridor. A building taller than 710' AMSL at this location would significantly reduce the capacity of the remaining airspace.
- **Lead airlines to shift departures from Runway 27 to Runway 33L.** This would reduce the efficiency of flight departure configurations in a Northwest wind condition
- **Shift overflights and associated noise** from communities south of Boston to communities west and north of Boston
- **Restrict existing FAA Circle-to-Land operations** to all runways, reducing flexibility of Logan FAA Air Traffic Control Tower to manage close-in flights

Therefore, Massport urges MCAF Winthrop LLC to explore alternative designs that meet the same project goals without exceeding the height of the 710 feet AMSL that would cause significant adverse Logan Airport operational and noise impacts.

About the Logan Airspace Map

The Logan Airspace Map defines the critical airspace around Boston Logan International Airport to protect the flight corridors in and out of the airport. It was created by Massport with input from airlines, pilots, city officials, and the Federal Aviation Administration (FAA) to help guide developers and regulatory authorities on building heights. The map aids developers in their planning and assists the FAA in its review of individual projects to determine if they present a potential hazard to air navigation. It was widely distributed to among the development agencies including BPDA and the developer communities and is available at: http://www.massport.com/media/11778/BOS_COMPOSITE_Ver2pt0_dec201_small.pdf. Note that the Logan Air Space Map is based on the NAVD 88 datum and is different from Boston City Base Datum.

Massport is committed to collaborating with the MCAF Winthrop LLC to ensure that the Project complies with the Airspace Map and can be completed in a timely manner. Massport will work with the Proponent from the beginning of the design and permitting process and during construction to minimize the impact of the cranes on Logan airspace.

Complying with the Airspace Map does not relieve proponents of the responsibility of complying with the FAA 7460 review process. MCAF Winthrop LLC will be required to file the 7460 forms no later than 45 days prior to construction but we encourage that this be filed as early as possible to avoid delays. Separate forms have to be filed for the building and the construction cranes.

Thank you for your consideration of our comments. Please feel free to contact me at (617) 568-3524 or at sdalzell@massport.com if you wish to discuss any of our concerns.

Sincerely,

Massachusetts Port Authority



Stewart Dalzell, Deputy Director
Environmental Planning and Permitting

Cc: T. Glynn, E. Freni, J. Doolin, J. Prankevicius, H. Morrison, F. Leo, S. Gongal/Massport
M. Walsh/FAA
J. Larkin/Millennium Partners
C. Tracy/BPDA
C. Schlessinger/Epsilon Associates

Enclosures:

Boston-Logan International Airport Composite of Critical Airspace Surfaces Map, and details of 115 Winthrop Square location

Logan Airspace Map

Boston - Logan International Airport
Composite of Critical Airspace Surfaces

Legend

Surface Elevations (MSL)

- 801' to 1,000'
- 601' to 800'
- 401' to 600'
- 201' to 400'
- up to 200'
- Downtown Zone Area

Dashed lines identify transition from "Flat" to "Sloping" surface.
Contour Interval = 25 FT

Notes:

1. This Composite Map is intended for informational and conceptual planning purposes only and does not represent actual survey data nor should it be used in the development of a FAA Form 7460. Massport does not certify the accuracy, information or title to the properties contained in this plan nor make any warranties of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.
2. This Composite Map does not replace the FAA's 7460 review process. Consistency with the surfaces shown on this map does not ensure that the proposal will be acceptable to the FAA and air carriers. Massport reserves the right to re-assess, review and seek modifications to projects that may be consistent with this Composite Map but that through the FAA 7460 process are found to have unexpected impacts to Boston Logan's safety or efficiency.
3. Surface elevations are referenced in feet Above Mean Sea Level (AMSL - NAVD88)

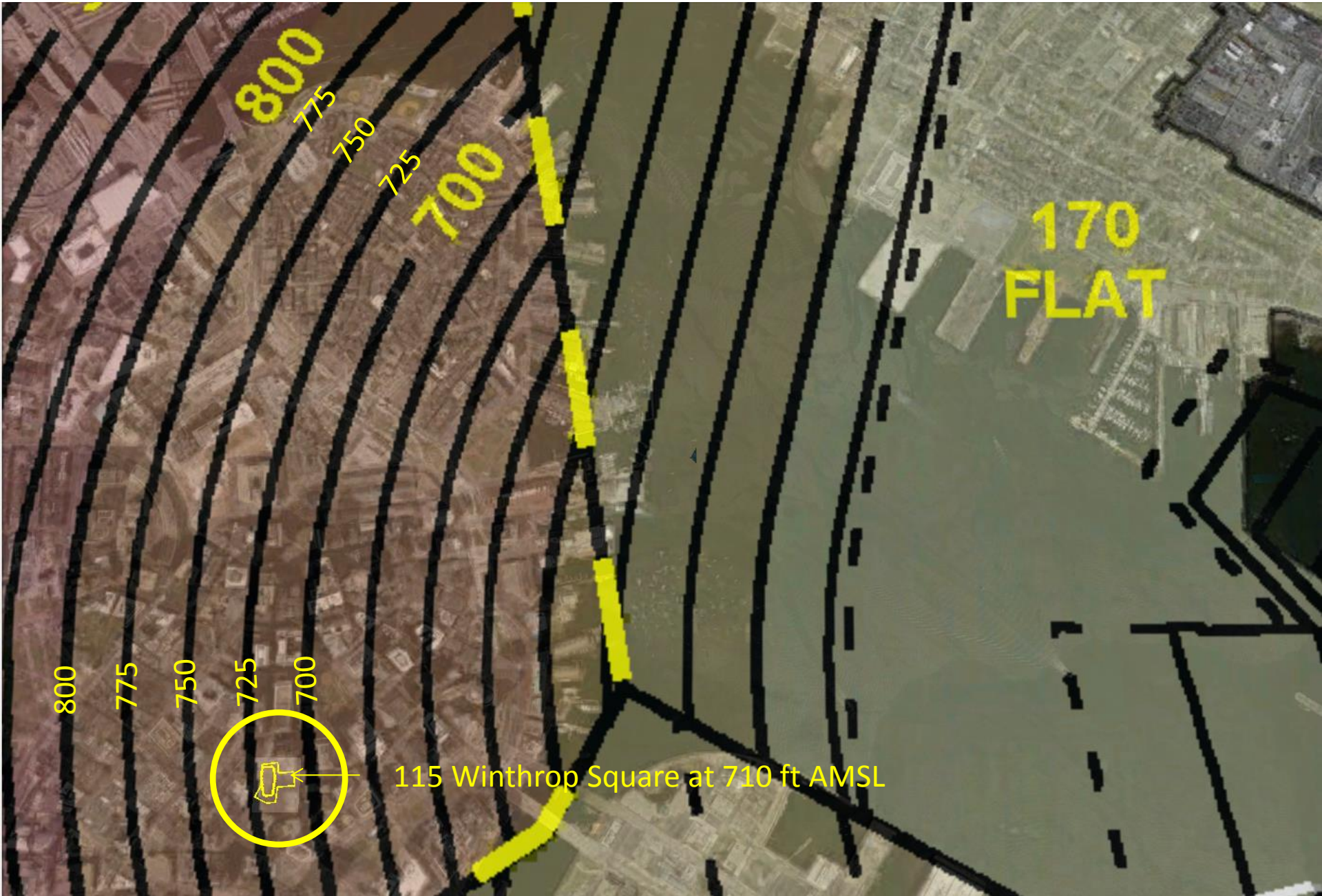
COMPOSITE MAP PARAMETERS

SURFACE TYPES	RUNWAYS
CIRCLE-TO-LAND	ALL RUNWAYS (EXCEPT 14)
ICAO/CAT ONE ENGINE INOP.	4R, 4L, 9, 14, 15R, 22L, 22R, 27, 33L
IFR STD DEPARTURE	4R, 9, 14, 15R, 22L, 22R, 27, 33L
IFR NON-STD DEPARTURE	4L
ILS APPROACH	4R, 15R, 22L, 27, 33L
ILS MISSED APPROACH	4R*, 15R, 22L, 27, 33L***
LOCALIZER APPROACH**	4R, 15R, 22L, 27, 33L
RNAV APPROACH**	4R, 15R, 22L, 27, 32, 33L
RNAV MISSED APPROACH	4R, 15R, 22L, 27, 32, 33L
PART 77 - STANDARD	EAST OF 4R/22L
PART 77 - VFR ONLY	WEST OF 4R/22L (N. OF DOWNTOWN)
VISIBILITY (CIRCLING)	ALL RUNWAYS (EXCEPT 14)
VISIBILITY (STRAIGHT-IN)	4R, 15R, 22L, 27, 32, 33L
RNAV APPROACH	4R, 15R, 27, 33L
RNAV MISSED APPROACH	4R, 15R, 27, 33L

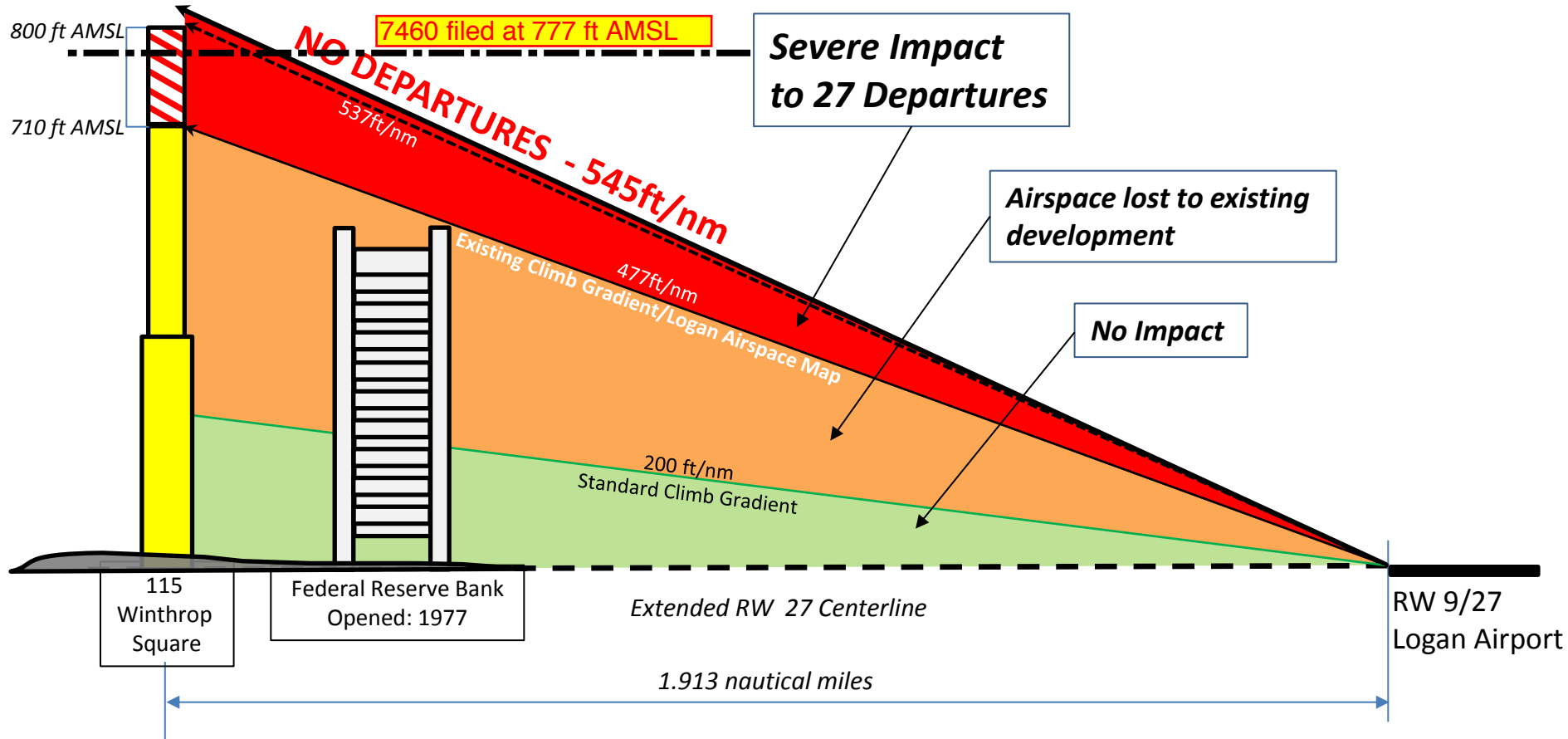
* INCLUDES TRANSITION FROM PREVIOUS CRITERIA
** CAT 1 AND CAT 3
*** CAT 3 SHIFTED 200NM
*** ADJUSTED FOR 1° DRIFT DOWN



115 Winthrop Square overlay on Logan Airspace Map



RW 27 climb gradient is already compromised more than twice the standard. Building taller than 710' AMSL will significantly degrade remaining airspace



Note: This graphic has been simplified to illustrate the issues in layman terms.
Please refer to FAA AC 8260.3C Fig: 2-1-4 for more details.