



For a thriving New England

CLF Massachusetts

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October 8, 2019

Honorable Charles D. Baker
Office of the Governor
Commonwealth of Massachusetts
State House
Boston, MA 02133

Administrator Jonathan Gulliver
Massachusetts Department of
Transportation, Highway Division
10 Park Plaza
Boston, MA 02116

Secretary and Chief Executive Officer
Stephanie Pollack
Massachusetts Department of Transportation
10 Park Plaza, Suite 4160
Boston, MA 02116

General Manager Steve Poftak
Massachusetts Bay Transportation Authority
10 Park Plaza, Suite 4510
Boston, MA 02116

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Subject: Notice of Violation and Intent to File Suit Under the Clean Air Act

Dear Governor Baker, Secretary Pollack, Administrator Gulliver, and General Manager Poftak:

Conservation Law Foundation (“CLF”)¹ has long advocated for healthy and safe multimodal transportation, while eliminating greenhouse gas emissions and air pollution, overcoming historic disinvestment and structural inequality, and improving public health and social mobility. On behalf of our 2,724 members in Massachusetts, CLF advocates for the Commonwealth to move as many people in as few vehicles as possible. To this end, CLF litigated and successfully obtained an agreement with then-state officials to create and maintain a high-occupancy vehicle (“HOV”) lane on interstate 93 (“I-93”) as one of several critical measures to mitigate the air quality and congestion impacts of the Central Artery/Tunnel project (“Big Dig”). Since the early 1990s, the I-93 HOV southbound lane, which is a 2.6-mile lane from Medford to the Leonard P. Zakim Bunker Hill Bridge, has encouraged people to travel in buses and carpools to reduce air pollution and climate-damaging emissions. Moreover, the I-93 HOV southbound lane is protected by law.

¹ CLF is a not-for-profit, member-supported, regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities for all in the New England region. CLF has a long history of advocating for a transportation system that is accessible, reliable, efficient, affordable, and free of air pollution and greenhouse gas emissions. Its mission includes safeguarding the health and quality of life of New England communities facing the adverse effects of air pollution and transportation policies. CLF’s membership includes individuals and organizations who are directly and adversely affected by the Clean Air Act violation set forth in this Notice.

The Massachusetts Department of Transportation’s (“MassDOT”) May 2019 decision to convert the I-93 HOV southbound lane to general use as mitigation for construction on the Tobin Bridge violates federal and state law, contradicts a long-standing agreement with CLF, and is bad public policy. The elimination of the HOV lane violates the Clean Air Act, because it is contrary to the [State Implementation Plan](#) and Massachusetts Department of Environmental Protection (“MassDEP”) regulations.² Additionally, elimination of the HOV lane violates a binding memorandum of understanding between MassDOT’s predecessor agency and CLF dated December 19, 1990.³ Finally, the elimination of the HOV lane contradicts the Commonwealth’s own stated policy goals on climate and equity. The elimination of the HOV lane thwarts efforts to rapidly reduce climate-damaging emissions and air pollution from the transportation sector. Further, this choice favors wealthier, single-occupant vehicle drivers traveling from the north shore and burdens lower-income public transit riders and people who choose to carpool.

CLF has urged MassDOT to reinstate the HOV lane and approve appropriate and lawful mitigation for residents and workers of Chelsea who are directly impacted by Tobin Bridge and consider alternative mitigation that promotes north shore drivers to choose public transit instead of driving. Along with the Chelsea Transportation Task Force, CLF has also urged the Massachusetts Bay Transportation Authority (“MBTA”) to work with MassDOT to design legally permissible mitigation measures that respond to the stated needs of communities, like Chelsea, most impacted by the multiple construction projects affecting nearly all travel routes throughout the municipality. MassDOT and MBTA have, thus far, implemented minimal mitigation for Chelsea residents and have not meaningfully improved transportation options.

CLF hereby gives notice of its intent to file suit pursuant to Section 304(a) of the Clean Air Act (“CAA”), 42 U.S.C. § 7604(a). This letter constitutes notice pursuant to 40 C.F.R., Part 54 (“the Notice”) to the addressed persons of CLF’s intention to file suit in the United States District Court for the District of Massachusetts seeking appropriate relief as set forth below, as well as CLF’s reasonable litigation costs, including attorney and expert witness fees and costs, no earlier than 60 days from the date that you receive the Notice. We intend to file a citizen suit naming as defendants Charles Baker, Jr., in his official capacity as Governor of the Commonwealth, Stephanie Pollack, in her official capacity as Secretary and Chief Executive Officer of MassDOT, Jonathan Gulliver, in his official capacity as Administrator of the MassDOT Highway Division, and Steve Poftak, in his official capacity as General Manager of the MBTA.

² Certificate of Adequacy of the Massachusetts State Implementation Plan Regarding Clean Air Act Sections 110(a)(1) and (2) for the 2015 Ozone National Ambient Air Quality Standards, Table 2 approving MassDEP regulation 310 CMR 7.37, Sept. 27, 2018, <https://www.mass.gov/doc/infrastructure-sip-for-2015-ozone-standard-september-2018/download> (Last visited Oct. 4, 2019).

³ CLF, the Executive Office of Transportation and Construction of the Commonwealth of Massachusetts (“EOTC”), and the Massachusetts Department of Public Works (“MDPW”) entered into a Memorandum of Understanding: Traffic and Air Quality Mitigation for the Central Artery/Third Harbor Tunnel Project, agreeing to a permanent I-93 southbound HOV lane on December 19, 1990. The memorandum of understanding and its commitments are binding on MassDOT as a successor agency to EOTC and MDPW.

For the reasons stated below, these parties, by failing to fulfill certain transportation commitments are in violation of the CAA.

REGULATORY BACKGROUND

Pursuant to the CAA, the Commonwealth of Massachusetts has adopted a [State Implementation Plan](#) ("SIP"). The Commonwealth adopted its SIP pursuant to of Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), and the [SIP was approved](#) by the Environmental Protection Agency under Section 110 of the Act, 42 U.S.C. § 7410. The Massachusetts SIP includes the regulation found at 310 CMR 7.37 ("Massachusetts HOV Lane Regulation").

The Massachusetts HOV Lane Regulation calls for "[t]he northward extension of the existing southbound high[-]occupancy vehicle lane on Interstate-93, north of the southern bank of the Charles River to I-95" (hereinafter "the northward extension"). 310 CMR 7.37(3)(a)(1) (Sept. 20, 2019). The Massachusetts HOV Lane Regulation further states:

The final design of the Charles River Crossing portion of the Central Artery/Tunnel project on Interstate-93 shall include a high occupancy vehicle lane that shall be made available for public use at the time the Charles River Crossing of the Central Artery/Tunnel project is opened for public use . . . The northernmost terminus of the HOV lane shall be located at a point just south of the Mystic Avenue exit ramp in Medford.

Id. at §7.37(4)(b).

The Massachusetts HOV Lane Regulation also requires attainment of certain performance standards:⁴

PERFORMANCE STANDARDS means a level of roadway performance that at a minimum: (1) is equal to or better than a Level of Service C, and (2) will result in average HOV trip times that are at least one minute per mile less than average trip times on adjacent general purpose traffic lanes during peak hours of travel, as defined in 310 CMR 7.37(6)(b)2. Either the MHD or the MTA may propose substitute roadway performance standards which attempt to maximize: travel time savings, reductions in emissions of ozone precursors, operational efficiency, and person throughput, and which require vehicle throughput of no less than 400 HOVs per hour for a high occupancy vehicle lane provided that such standard provides for greater improvement in air quality for VOC, CO and NO_x in the area where the HOV lane is targeted, in both the short and long term. The Department shall review any proposed substitute roadway performance

⁴ The performance standards reference the Massachusetts Highway Department ("MHD") and the Massachusetts Turnpike Authority ("MTA") and several air pollutants: volatile organic compounds ("VOC"), carbon monoxide ("CO"), nitrogen oxides ("NO_x").

standard, and shall either reject or accept it within 60 days after it has been submitted to the Department.

Id. at § 7.37(1).

Once a new HOV lane is established, or an existing lane is expanded, the Massachusetts HOV Lane Regulation requires monitoring of the HOV lane “or facility performance, as measured by trip times, during peak periods of travel, to ensure that high[-]occupancy vehicle performance standards are being met” for a period of two years.⁵ *Id.* at § 7.37(7). The Massachusetts HOV Lane Regulation further directs that MassDOT “shall use all appropriate and feasible measures to maintain compliance with the high occupancy vehicle lane performance standards.” *Id.* In the event that performance standards are violated “for 75% of the time runs in a particular month,” the relevant agency is required to submit a written report describing the violation and “describ[ing] a commitment . . . to take whatever measures are feasible and necessary to return the high[-]occupancy vehicle lane to compliance with the performance standards.” *Id.*

Subsection 9 of the Massachusetts HOV Lane Regulation requires the development of an enforcement plan for the HOV lane system, while subsection 12 establishes that the implementation of HOV lanes are permanent. *Id.* at § 7.37(9), (12). Specifically, the Massachusetts HOV Lane Regulation states “[a]ll HOV lanes built pursuant to 310 CMR 7.37(1) through (7) . . . shall be permanently operated and maintained.” *Id.* at § 7.37(12). The Massachusetts HOV Lane Regulation requires that “[a]ll high occupancy vehicle lanes shall be dedicated for exclusive high occupancy vehicle use during peak periods of travel.” *Id.* at § 7.37(6)(b).⁶

To change an HOV lane designation, a transportation agency “may petition the Department [of Environmental Protection] to either reduce or terminate the operation, maintenance or implementation of any HOV lane [. . .] by demonstrating that such lane or project will achieve equal or greater emission reductions of VOC, CO and NOx from mobile sources and will provide for greater improvement in air quality for VOC, CO and NOx in both the short and long term.” 310 CMR 7.37(12). The Massachusetts HOV Lane Regulation also provides the steps to be taken by MassDEP in response to such a petition, including a review of the petition, a requirement for “notice and public hearing,” and a filing of the petition and supporting documentation with the U.S. EPA, Region 1. *Id.* at § 7.37(8)(a)(2–3). Further, the implementing agency would be required to file a request for a SIP amendment.

⁵ Following the two-year period, “the MHD and the MTA shall continue to monitor high[-]occupancy vehicle lane and facility performance, to measure trip times . . . and to maintain records of such monitoring and measurements, and upon written request shall send reports to the Department containing the information and commitments described [herein] . . . provided further that compliance with performance standards during this later period shall be determined on a quarterly basis.” *Id.*

⁶ “Peak periods of travel” are defined as, “at a minimum, three hours between the hours of 6:00 A.M. and 10:00 A.M.” for the northward extension of the existing HOV lane. 310 CMR 7.37(6).

FACTUAL BASIS OF CLF'S CLAIM

On May 14, 2019, MassDOT eliminated the I-93 HOV lane to allow all vehicles, regardless of the number of passengers, to use the lane.⁷ MassDOT communicated this decision via twitter and a subsequent press release.⁸ MassDOT justified this decision as a two-year “temporary measure to alleviate impacts” of construction projects relating to the Tobin Bridge, North Washington Street Bridge, and Green Line Extension bridge closures.⁹ MassDOT did not provide notice or a public hearing, did not request a change to the Massachusetts HOV Lane Regulation, or file a request for a SIP amendment.

This HOV lane was originally approved to discourage single-occupancy vehicles, encourage fewer vehicles to move more people, reduce congestion and, consequently, reduce the overall quantity of air pollutants released by automobiles. Simply put, HOV lanes reduce emissions of NOx, carbon dioxide, CO, particulate matter, and VOCs¹⁰ that harm human health,¹¹ with clear benefits for residents and workers living near I-93. Both the 1990 amendments to the Clean Air Act and the 1991 Intermodal Transportation Act recognized the air quality benefits of HOV lanes.¹² Indeed, that is why many states have adopted the use of HOV lanes and why Massachusetts included this HOV lane in its SIP. HOV lanes also reduce carbon emissions that cause climate change, thereby advancing our goals under the Global Warming Solutions Act.¹³

Elimination of the HOV lane burdens public transit riders, especially transit-dependent riders that can hardly afford more expensive transportation options. Since the elimination of the HOV Lane, MassDOT's own data suggest that certain bus routes affected by the Tobin Bridge construction are running slower than they were prior to the elimination. For example, MassDOT's calculation of MBTA bus run times on routes 325 and 326, which previously traveled in the HOV lane transporting riders from/to Medford, find that these routes are running

⁷ MassDOT Highway Administrator Report, June 2019, https://www.mass.gov/files/documents/2019/06/18/dot-HighwayAdmReport_061719.pdf, slides 3 and 4 (Last visited Oct. 4, 2019).

⁸ MassDOT Blog, May 10, 2019, <https://blog.mass.gov/transportation/massdot-highway/travel-advisory-tobin-bridgechelsea-curves-rehabilitation-project/> (Last visited Oct. 4, 2019).

⁹ MassDOT Communications Tweet, May 10, 2019, <https://twitter.com/jacquegoddard/status/1126996319933992962?s=21> (Last visited Oct. 4, 2019).

¹⁰ U.S. Department of Transportation Federal Highway Administration Tolling and Pricing Program Policy Options Evaluation Tool, https://ops.fhwa.dot.gov/publications/fhwahop09029/sec4_policy.htm (Last visited Oct. 4, 2019.)

¹¹ Union of Concerned Scientists: Inequitable Exposure to Air Pollution from Vehicles in Massachusetts: Fact Sheet, 1 (June 2019), <https://www.ucsusa.org/sites/default/files/attach/2019/06/Inequitable-Exposure-to-Vehicle-Pollution-MA.pdf>, (Last visited Oct. 4, 2019).

¹² U.S. Department of Energy, Alternative Fuels Data Center, Alternative Fuel Vehicles and High Occupancy Vehicle Lanes, <https://afdc.energy.gov/laws/HOV> (Last visited Oct. 4, 2019.)

¹³ The GWSA was enacted by passage of Chapter 298 of the Acts of 2008 (“An Act Establishing the Global Warming Solutions Act”) (the “GWSA Session Law”); the bulk of provisions that create on-going authority and obligation were codified, via GWSA Session Law § 6, as Chapter 21N of the General Laws, as the “Climate Protection and Green Economy Act” (“Chapter 21N”).

5-8 minutes slower in the morning as measured in June and July 2019 compared to June and July 2018.¹⁴ MassDOT also calculates that MBTA bus run times on route 111, which travels over the Tobin Bridge transporting riders from/to Chelsea who are predominantly people of color and lower-income residents and workers, is running 2-6 minutes slower in the morning as measured in June and July 2019 compared to June and July 2018.¹⁵ The MBTA has the duty to operate “mass transportation facilities and equipment in the public interest,” to provide a high standard of service to its riders, and to achieve maximum effectiveness in complementing other forms of transportation to promote the general economic and social well-being of the area it serves.¹⁶ Accordingly, the MBTA is violating the law by failing to provide a high standard of service to its riders through operating its buses with delays, and is failing to achieve maximum effectiveness in complementing other forms of transportation by not increasing service and providing other mitigation since construction project commencement.¹⁷

Mitigation measures are needed to address the negative impacts of Tobin Bridge, North Washington Street Bridge, and Green Line Extension closures on commuters and residents in proximity to these extensive projects. Since January 24, 2019, the Chelsea Transportation Task Force, comprised of representatives from the MBTA, City of Chelsea, GreenRoots, Inc, and Chelsea residents, has requested mitigation for the Tobin Bridge construction project, including fare mitigation on the most frequently-traveled bus routes, a dedicated HOV lane on the Tobin Bridge, additional bus inspectors at key bus stops, existing bus route re-routing, new and improved routes that affordably connect communities such as Chelsea and Lynn, and increased service on bus routes 111, 112, 116, 117, 426, and 428.

Elimination of the HOV lane burdens people who choose to carpool. CLF’s members and others who carpool and previously relied on the HOV lane report slower commutes since the HOV lane was eliminated in May.

MassDOT and the MBTA have had the opportunity to respond directly to the expressed needs of impacted stakeholders with legally permissible mitigation measures that benefit our health, climate, and wallets.¹⁸ Instead, MassDOT took its action without proposing any substitute project in conformity with controlling law, without notice, without a public hearing, and without the appropriate steps to seek a regulatory change or SIP amendment. Regardless of its temporary nature, MassDOT’s action violated the Massachusetts HOV Lane Regulation, 310 CMR 7.37.

¹⁴ Tobin Bridge / Chelsea Curves Rehabilitation Project I-93 HOV Lane Update, Slide 16, August 1, 2019. This presentation was provided to CLF in person by Administrator Gulliver. See Appendix A at slide 16 titled “MBTA Bus Run Times.”

¹⁵ *Id.*

¹⁶ M.G.L. c. 161A, § 5(a).

¹⁷ *Id.*

¹⁸ Elected officials have expressed concerns over the elimination of the HOV lane and the need for public input. See Appendix B.

Because the Massachusetts HOV Lane Regulation is part of the Massachusetts SIP under the CAA, MassDOT's action further violates the CAA.¹⁹

RELIEF REQUESTED

MassDOT and the MBTA are liable for the above-described violations of the Massachusetts HOV Lane Regulation and the CAA, as well as for violations occurring prior to the date of this letter and for every day that these violations continue.

In the event that the above-described violations of the Massachusetts HOV Lane Regulation and the CAA are not promptly cured, CLF will commence a lawsuit and will seek declaratory relief and injunctive relief to prevent further violations of the Massachusetts SIP and the CAA, other mitigation that benefits residents of Chelsea and other communities north of Boston with transit-dependent populations and carpoolers, cooperating with MassDEP during a rulemaking proceeding that considers regulatory changes to improve transportation options that have broad public benefit, and such other relief as permitted by law.

In addition, pursuant to Section 304(d) of the CAA, 42 U.S.C. § 7604(d), CLF will seek recovery of costs and fees associated with this matter, including but not limited to, attorney's fees.

CONCLUSION

During the 60-day notice period, CLF is willing to discuss effective remedies for the violations noted in this letter that may avoid the necessity of further litigation. If you wish to pursue such discussions, please have your attorney contact me in the next 21 days so that negotiations may be completed before the end of the 60-day notice period.

Very truly yours,



Staci Rubin, Esq.
Senior Attorney

¹⁹ MassDOT has made no claim and no assertion that its action was taken to address an emergency; and, in any event, emergency amendments to existing regulations must be made in accordance with the provisions of the Massachusetts Administrative Procedures Act.



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APPENDIX A MBTA Bus Run Times

Tobin Bridge / Chelsea Curves Rehabilitation Project

I-93 HOV Lane Update
August 1, 2019

I-93 HOV / Express Lane to Zakim

MassDOT Opening I-93 HOV Lane to All Traffic



Overview:

- Allows all vehicles use of the lane 24/7
 - Southbound only
- Temporary measure to alleviate impacts of:
 - Tobin/Chelsea
 - North Washington Street Bridge
 - GLX – full bridge closures/detours *Kittelson - Modeling*
- Goal is to reduce Tobin/Chelsea traffic by 400 vehicles an hour – this lane adds an additional lane of capacity to I-93 SB
4 minute delay time versus 20 minute delays
- Largest benefit is to drivers from the North Shore
- Traffic counts were collected in June ²⁰¹⁹ and again in September ²⁰¹⁹

Other mitigation efforts:

- Additional MBTA Blue Line trains
- Free inbound SL service from Chelsea / *no transfer included*
- CharlieCards accepted on Commuter Rail
 - Between Chelsea and North Station

I-93 HOV / Express Lane to Zakim

Pre-Implementation:

- Evaluated I-93 SB approaching Boston
 - Developed a detailed FREEVAL Work Zone model
 - Traffic counts and driver's behavior
 - Determined there was capacity with entry to HOV causing additional friction

On-Going Monitoring and Data Analysis:

- Traffic counts started on June 19th specific to "Express Lane"
 - Additional counts will be done in September
- Evaluating permanent counting stations to see how/if traffic has changed
- Route 1A toll gantry to see if there is a reduction in volume
- Moving people vs. moving vehicles
 - Partnering with CTPS to count passengers in vehicles prior and post implementation
- MBTA Coordination
 - Monitoring bus travel times
 - Using GPS data to track pre/post travel times

MBTA Bus – 325/326



- Travels on I-93
- Used the HOV lane
- HOV restriction was removed SB only

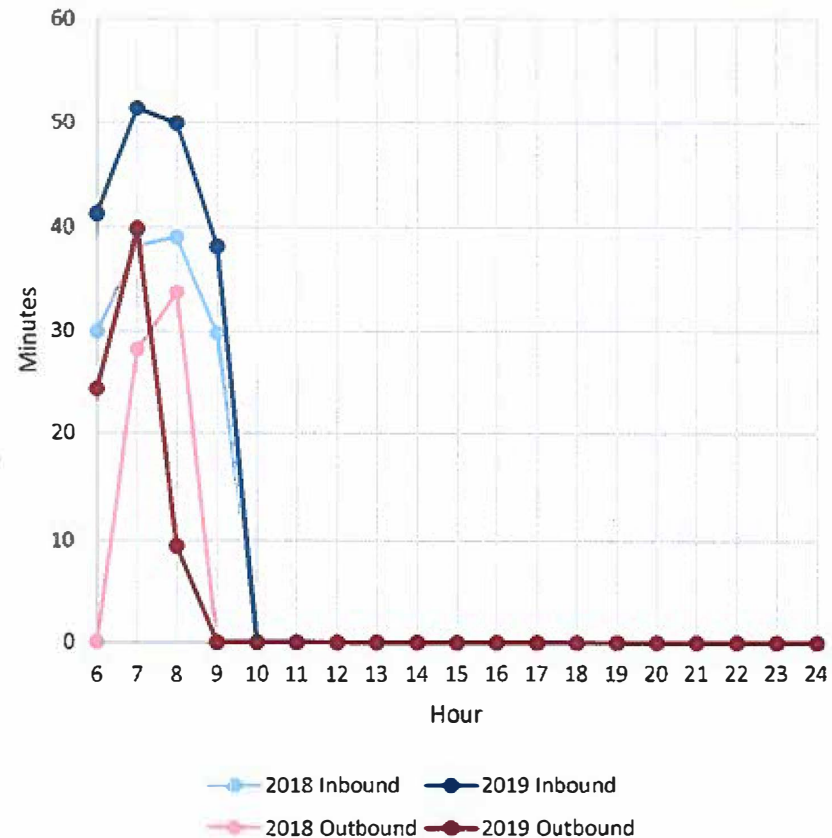
MBTA Bus Run Times

June/July 2018 vs June/July 2019

Key changes at median:

- 111 IB: 2-6 min slower in AM
- 111 OB: 4-7 min slower in PM
- 325 & 326 IB: 5-8 min slower in AM
- 325 & 326 OB: 5 min slower in PM
- SL3 IB: 2-4 min slower in AM
- SL3 OB: 2-3 min slower in PM

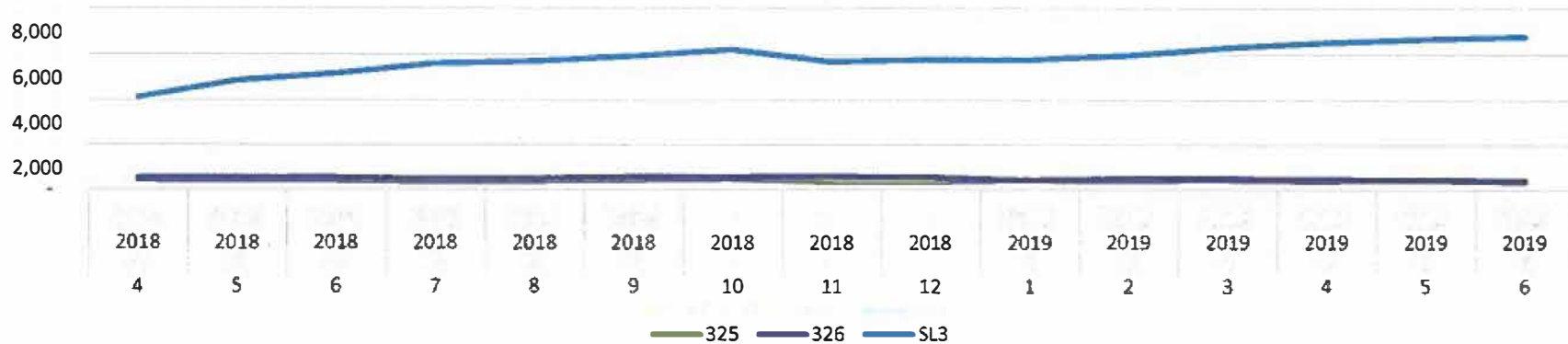
Median
Average of all routes effected by Tobin Project



MBTA – SL3 with 325 & 326



Avg Weekday Ridership by Month: SL3, 325, 326



Month	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6
Route	2018	2018	2018	2018	2018	2018	2018	2018	2018	2019	2019	2019	2019	2019	2019
325	426	387	387	336	349	407	457	340	340	429	392	424	380	422	351
326	502	511	516	460	482	548	542	586	555	421	490	490	467	439	430
SL3	4,123	4,851	5,168	5,606	5,694	5,918	6,220	5,689	5,796	5,784	5,976	6,306	6,534	6,682	6,787

325/326 ridership does not include trips added by Bus Operations during Spring 2019 to help make up for a reduction in scheduled trips

APPENDIX B
Letter from Legislators Criticizing HOV Lane Elimination



SENATOR JASON M. LEWIS
Fifth Middlesex District
STATE HOUSE, ROOM 511B
BOSTON, MA 02133-1053
TEL. (617) 722-1206
FAX. (617) 722-1063

Jonathan L. Gulliver
Highway Administrator
Massachusetts Department of Transportation
10 Park Plaza, Boston, MA 02133

June 19, 2019

Dear Mr. Gulliver,

We write to you after being contacted by many of our constituents about the closure of the HOV lane on I-93 South. We share the concerns of our constituents that this change appears to fail to meet our shared goals of encouraging carpooling, public transit, and other smart approaches to moving people, especially commuters, along our public ways.

Moreover we understand that there are some concerns around this policy change's consistency with the Commonwealth's obligations to its own statutes and to the federal Clean Air Act. We understand that there are extenuating circumstances that compelled the agency to make this decision; however, we are concerned that the decision was made without sufficient public engagement and process.

We encourage MassDOT to reconsider this decision as soon as possible.

Sincerely,

			
Jason Lewis	Julian Cyr	Sal DiDomenico	Patricia Jehlen
State Senator	State Senator	State Senator	State Senator
5 th Middlesex	Cape & Islands	Middlesex & Suffolk	2 nd Middlesex



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR JASON M. LEWIS





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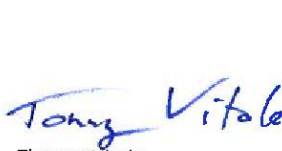



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6th Bristol 21st Middlesex 30th Middlesex 29th Middlesex


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State Representative State Representative State Representative State Representative
17th Suffolk 17th Essex 18th Essex 14th Bristol


Denise Provost Lindsay Seabrook Alan Silva Thomas Vitolo
State Representative State Representative State Representative State Representative
27th Middlesex 1st Hampshire 7th Bristol 15th Norfolk

June 18, 2019

Jonathan Gulliver
MassDOT Highway Administrator
10 Park Plaza,
Boston, MA, 02116

RE: Elimination of I-93 Southbound HOV Lane

Administrator Gulliver,

I am concerned about the disincentives to ride sharing caused by the Massachusetts Department of Transportation's ("MassDOT's") decision to eliminate the high-occupancy-vehicle lane ("HOV Lane") on Route I-93 Southbound ("93 South"). I understand that the elimination of the HOV Lane was caused by the anticipated increase in traffic due to construction on the Tobin Bridge. However, I respectfully suggest that the increase could be better addressed by encouraging the re-routed drivers to utilize transit options or carpool, thereby using the high-occupancy vehicle lane.

I commend MassDOT's efforts to expand access to Blue Line, Silver Line, and Commuter Rail access in response to this issue. However, eliminating the HOV Lane for such an extended period runs counter to the Commonwealth's goal of easing traffic congestion by placing emphasis on sustainable transportation. Taking away this lane penalizes carpoolers and public transit riders who have used this lane as a way to expedite their commute into the city.

The HOV lane appears to have been working as it was originally intended, and change, while temporary, will greatly impact the travel of commuters on a daily basis. I believe the Commonwealth would be well served to use this opportunity to incentivize drivers new to 93 South to join carpools and take advantage of the HOV Lane, rather than disincentivize all drivers using that route from forming or retaining carpool arrangements.

This critical issue affects many of my constituents who commute to Boston each day. I look forward to working with the department as you work to address the issue at hand. Thank you for your attention to this matter.

Sincerely,

Kenneth I. Gordon
State Representative
21st Middlesex District