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December 15, 2005

Robert W. Golledge, Jr., Commissioner
Department of Environmental Protection
One Winter St.
Boston, MA 02108

RE: Proposed Amendments to State Implementation Plan, 310 CMR 7.36

Dear Commissioner Golledge,

I am writing with a mix of praise and serious concerns about the proposed amendments to the State Implementation Plan, 310 CMR 7.36 (SIP).

I am grateful to the Commonwealth for finally expressing a strong commitment to completing the Green Line extension from Lechmere. However, instead of strengthening the Commonwealth's commitment to completing the Green Line extension from Lechmere, I fear that several proposals would in fact weaken that commitment. Additionally, by weakening the substitute provisions and ignoring the Blue-Red Line connector, the amendments wander perilously close to abandoning the original intent of the SIP – cleaner air in communities that need it most.

Prior to discussing the SIP amendments in detail I would like to comment on the public participation process the Department of Environmental Protection (DEP) has implemented:

- Thank you for your willingness to extend the comment period. I am hopefully that the comment period can be further extended from January 17, 2006, to January 31, 2006. The holidays are an extremely busy time for most people, and adding two more weeks to the comment period would ensure getting as much feedback as possible from the community.
- DEP should consider holding additional hearings in geographical diverse locations to augment the hearing scheduled for December 21, 2005. Holding a single hearing, especially one so close to the holidays, minimizes resident participation and comments from a diverse range of viewpoints. Additional hearings should be held in the areas which will be most affected by the proposed changes in the transit commitments – especially those communities affected by the loss of the Blue/Red Line Connector.

As the State Senator representing portions of Union Square, Somerville and Cambridge, I am especially grateful for DEP and EOT's commitment to complete the Green Line extension. I do have several specific concerns about how the proposed amendments may undermine the Commonwealth's commitment to completing the Green Line extension from Lechmere.

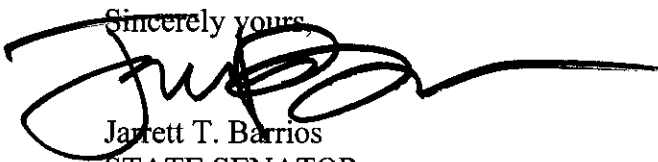
First, the extension of the deadline from 2011 to 2014 includes no mitigation for the community to offset the delay. I have said it before and I will say it again: **the communities of Somerville, Cambridge and Medford have waited too long for the Green Line extension to become reality.** These communities – Somerville in specific -- suffer from extreme rates of air pollution due to I-93 traffic and diesel commuter rail trains, an additional three years without mitigation is not acceptable. There is also a lack of a specific timeline that lays out benchmarks for funding, planning, design, engineering, and construction before the final deadline. The state should develop a detailed project timeline and intermediate substitutions such as cleaner buses, cleaner commuter rail trains or additional shuttle vans for seniors must be considered in the event of further delays.

Second, the original provisions limiting project substitution must be maintained. The commitment for cleaner air made to the communities as described in the original SIP must be upheld through all stages of the planning process. **I am very worried that the proposed change of the definition of "project area" removes the commitment to improve air quality for Somerville and Medford residents, and provide wiggle room for the Commonwealth to back out of its commitment.**

In addition, I am troubled by the elimination of the criteria for dropping a particular project. The requirement that projects be shown infeasible before they can be removed from the SIP list, absent a SIP amendment, should be maintained. If this high standard cannot be kept, some criteria for project changes should be added as well as a requirement for public participation prior to any change in the project list. The regulation should not allow projects to be dropped by the Executive Office of Transportation at will without any criteria, DEP oversight, or public participation. Finally, in turning its back on the Blue-Red Line connector the Commonwealth is ignoring a project that will have a significant impact for thousands of workers along this corridor.

I have been extremely happy with the progress the Commonwealth has made on its commitment to the Green Line extension – but we all need to remain vigilant to ensure that the original clean air intent of the SIP is maintained. I know that we both share a commitment to cleaner air and water, especially in those environmental justice communities (like Somerville) that have for too long been overburdened. To that end, I sincerely hope that DEP will consider revising the SIP amendments in the ways described above. Thank for your time and deliberation on this issue. I am,

Sincerely yours,



Jarrett T. Barrios
STATE SENATOR

JTB/cbd