



April 24, 2023

MBTA Capital Investment Plan  
c/o MBTA General Manager  
10 Park Plaza, Suite 3830  
Boston, MA 02116

**Comment Letter: Proposed MBTA FY24-28 Capital Investment Plan (CIP)**

Dear General Manager Eng:

On behalf of A Better City and its more than 130 member businesses and institutions, I am pleased to submit comments on the draft MBTA Capital Investment Plan for FY24-28 (CIP). A Better City is a diverse group of business leaders united around a common goal—to enhance Boston and the region’s economic health, competitiveness, vibrancy, sustainability, and quality of life. Our region cannot thrive without a safe, reliable, and affordable public transit system and we appreciate the role the MBTA plays in supporting the Commonwealth’s mobility, environmental, and economic goals.

The CIP serves as the central blueprint for improving the MBTA’s infrastructure. This year’s 5-year plan places appropriate emphasis on critical investments in safety related to the Federal Transit Administration (FTA) inspection, as well as repairs that are needed to restore service and reliability for subway lines. Also, this plan continues many projects that are in the construction phase or under contract for anticipated work.

Our comments in this letter primarily focus on additional priorities that should be accelerated and included in this five-year plan. By doing so, the MBTA can more efficiently and meet the needs of commuters throughout the region. Adopting these comments would also help make meaningful progress toward the Healey-Driscoll Administration’s stated goals related to transit equity, decarbonization, and improved service in the core subway system.

A Better City encourages the MBTA to incorporate the following recommendations into the final CIP:

1. Accelerate action to electrify the Commuter Rail system and increase funding necessary to deliver on Regional Rail Phase 1;
2. Prioritize bus transformation by adding funds to modernize bus maintenance facilities and procure additional battery electric buses;
3. Allocate funding to strengthen the system's resilience to climate change; and
4. Advance projects that improve productivity and capacity, such as advanced transit signals for the Red and Orange lines and the Red-Blue Connector.



Additional comments are enclosed. We thank you for considering A Better City's perspective and look forward to working with you in the months ahead.

Sincerely,

A handwritten signature in black ink that reads 'Kate Dineen'.

Kate Dineen  
President & CEO

cc: Secretary Gina Finadaca, Massachusetts Department of Transportation  
Undersecretary Monica Tibbits-Nutt, Massachusetts Department of Transportation



## Detailed Comments on MBTA FY24-28 Capital Investment Plan

### Concerns About Overall Amount of Resources

While this is a fiscally constrained plan, the overall trajectory of capital spending continues to be a significant concern to A Better City and our members. For the first time in recent memory, this CIP is smaller in total projected spending (\$9.2 billion) than the previous year's five-year plan (\$9.6 billion). This is alarming at a time when the federal government is spending a record amount on transportation infrastructure, the FTA is requiring increased capital spending to repair the system, and previously endorsed projects are delayed or left out of the CIP. The MBTA requires additional revenue and the Commonwealth needs a comprehensive transportation finance plan to achieve our shared goals. New money for the MBTA will not be available before this CIP is approved, but the process should at least be transparent on the future financial gap to properly repair the MBTA. ***A Better City recommends adding additional narrative in the final CIP to describe the funding gap for infrastructure modernization plans anticipated over the next five years.***

### Plan for Possible Reallocation of CIP, Once Fair Share Funds are Appropriated

Governor Healey and the House Ways & Means budget both recommend \$100 million from the new Fair Share Amendment to address MBTA bridges. Considering the alignment between the Governor and the House plans, it is safe to assume that potentially \$100 million or more could be appropriated to support MBTA infrastructure. This would allow the CIP to adjust multiple project timelines so that funds can be used in an expeditious manner. Therefore, there may be an opportunity to advance other MBTA projects once the Fair Share funding is appropriated in July. This could result in accelerated plans and increased CIP funding for Regional Rail Phase 1 projects, FTA safety repairs, and climate resilience efforts. ***A Better City recommends anticipating this possibility and developing a targeted list of \$100 million worth of ideas that can be ready-to-go if state budget funds are made available in July, as expected. This list should be an extension of the exercise to explain the unfunded capital needs of the MBTA.***

### Regional Rail Phase 1

It should be easier for readers to understand the financial commitment and timelines related to Rail Transformation. The CIP currently shows some commitment to Phase 1 of Regional Rail, but this should be its own category, so the public can follow the total funding proposed for this work. Please consider changes in how this initiative is displayed. Additionally, Governor Healey committed to achieving a fully electrified commuter rail system by 2040, which is ten years faster than the current MBTA schedule, so this CIP should add funding to better align with this accelerated timeline.

In April 2021, the MBTA previously committed to a tentative implementation schedule, which included investments to strengthen the Rail transformation team, preparations for an electric multiple unit (EMU) pilot, double-tracking at several stations, construction of high platforms at key stations, EMU procurement, design for an electrified maintenance facility, and a design and



preconstruction for Phase 1 of Regional Rail. The CIP should reflect these projects. Funding for Regional Rail in this CIP represents approximately 1% of the budget. ***A Better city recommends including an additional \$33.8 million in the final CIP to advance the following three additional Regional Rail Phase 1 projects:***

| Project  | Description   | Primary Mode/Line                          | Current Phase | FY24-28 Programmed Spend | Total Authorized Budget |
|--|---|--|---------------|--------------------------|-------------------------|
| Rail Transformation Early Action                                       | Design for double tracks and high-level platforms on the Old Colony Trunk   | Commuter Rail: Old Colony Trunk            | Planning      | \$10.5 M                 | \$200 M                 |
| Electrification and Upgrades to Fairmount Line                         | Design for overhead catenary and upgraded power supply for the Fairmount Line with high-level platforms at Readville and Fairmont Station. Assessment and design of infill stations at Columbia Road/Ceylan Park. | Commuter Rail: Fairmount Line              | New project   | \$7.5 M                  | \$150 M                 |
| Accessibility and power upgrades along the Providence / Stoughton Line | Design for accessibility and power upgrades, including electrification of Stoughton Line, high-level platforms on both Providence and Stoughton branches, and substation expansion in Roxbury and Sharon          | Commuter Rail: Providence / Stoughton Line | New project   | \$15.8 M                 | \$271 M                 |

### **Bus Maintenance Facilities**

This CIP “supports the MBTA’s Bus Electrification Strategy that seeks to achieve full bus electrification by 2040,” however Governor Healey made a public commitment to reach this goal by 2030. Considering this accelerated timeline, the CIP will need to develop a new approach towards meeting this ambitious initiative. A Better City has previously commented on challenges in the bus maintenance facilities and offered innovative solutions that should be considered as part of the MBTA’s overall philosophy on bus electrification. It will take more than new money to expand these facilities in a way that supports an increased bus fleet as documented in the agency’s 2017 Integrated Fleet and Facilities Plan (IFFP). The IFFP identified a conceptual budget of nearly \$808 million to complete all nine facilities, but A Better City



reported it is likely to cost between \$3-\$4 billion over twenty years to reach this goal.

The draft CIP includes \$596 million for bus facilities, with only construction funding included for one project (Quincy). Other bus maintenance facility modernization projects are already behind schedule, so there are reasonable questions about the MBTA's ability to fund and deliver on all nine bus maintenance facilities to accommodate an all-electric bus fleet. [A Better City published a report on the potential to improve the Albany Street garage in Boston](#) as a mixed-use development that can serve the MBTA's busing needs. Expanded P3 authority will require legislation, but the capital plan of the MBTA should support this process by including funding in future years that would contribute to this effort. If the larger goal is to improve bus maintenance facilities to serve an electric bus fleet, reduce carbon emissions, and better serve transit dependent riders, P3 authorization can help the MBTA deliver projects faster. Also, this approach would allow the region to maximize economic development opportunities and build new housing near bus facilities. ***A Better City suggests that the MBTA take a two-phased approach to advance the bus maintenance facilities initiative. First, the MBTA should add \$300 million in funds to the final CIP to include construction of the Arborway Bus Facility, as the draft CIP only includes design phase funding. Then, the MBTA should prepare the capital plan to reserve financial support for joint developments and P3s for the remaining seven bus maintenance facility projects.***

### **Climate Resiliency Infrastructure**

The current resources dedicated to resiliency needs are not sufficient, especially considering the studies and assessments completed by the MBTA in previous years. The MBTA's 2017 Strategic Plan called on the MBTA to "prioritize environmental stewardship and climate resiliency" and complete systemwide assessments to determine the vulnerability of MBTA infrastructure and assets in the face of climate change. The MBTA completed its MBTA Vulnerability Assessment Report in 2018, which provided a framework for assessing and scoring the system's vulnerability to climate change. In December 2020, the MBTA provided an overview of the Authority's climate resilience program, including the T's climate change resilience strategy, the process for implementing projects, and the status of climate vulnerability assessments. This 2020 update showed positive steps forward, having completed one full vulnerability assessment (Blue Line) with some elements of other corridors (Green Line Extension), but little information has since become available, especially with respect to the needs of the Red and Orange Lines. ***A Better City recommends allocating \$250 million in additional funding in the final CIP to implement completed MBTA climate vulnerability assessments.***

### **Red & Orange Line Signals**

The Red and Orange Lines are the workhorses of the MBTA system. Like much of the transit system, these two key subways suffer from decades of underinvestment, as capital maintenance and worthwhile upgrades were deferred. Over the past few years, the MBTA created a \$1.1 billion plan for various Red Line and Orange Line infrastructure upgrades, including new vehicles, improvements to maintenance facilities and yards, test tracks, power systems, and



signals. The CIP is continuing much of the previously authorized work, but still needs to be adjusted to properly address modern signals necessary to improve the system.

A Better City has conducted extensive research demonstrating the feasibility of achieving some of the semi-autonomous operational benefits ordinarily found only in Communications-Based Train Control (CBTC) signals into the planned Fixed-Block system upgrades. Specifically, A Better City believes that existing MBTA contracts for new vehicles and signals upgrades can be amended to incorporate the ability to automate train acceleration/deceleration between stations, as well as the station berthing process. Additionally, if the MBTA can achieve the semi-automatic berthing capability (i.e., automated station stopping with precision), then the system should pilot the installation of Platform Screen Doors along the length of several key station platforms. Platform Screen Doors are used in many world-class cities to enhance track safety by preventing fires caused by trash and debris falling into the track pits, improve passenger safety by preventing accidental and other falls from the platform, improve the flow of passengers exiting and entering vehicles and reduce dwell times. ***A Better City recommends allocating \$100 million in the final CIP to improve signal technology by adding Semi-Automatic Capability into the new Red and Orange Line vehicles (approximately \$75 million) and implementing a Platform Screen Doors pilot program at several stations (approximately \$25 million).***

### **Red-Blue Connector**

This CIP includes funding for the early stages of the Red-Blue Connector, but only for planning and initial design. Before FY28, the project should complete design and enter the construction phase and the final CIP should include budget capacity to do this, without delay. To support the budgetary needs of the project, the MBTA should be preparing a New Starts grant application for the full Red-Blue Connector so that this project can leverage federal funds. The Green Line Extension (GLX) project only became a reality because of a New Start grant that delivered \$1 billion dollars to this region. With GLX essentially complete, the Red-Blue Connector should be the next New Start project supported by the MBTA. ***A Better City recommends including \$300 million for years FY26-28 in the final CIP to prepare for the next phases of the project and position the Red-Blue Connector to be the MBTA's next New Starts grant success story.***



**Summary of A Better City’s Recommended Allocations**

| <b>Project</b>                             | <b>Draft CIP FY24-28 Programmed Spend</b> | <b>A Better City Recommended Increase</b> | <b>Notes</b>  |
|--|---|---|---|
| Regional Rail Phase 1 Additional Actions   | \$93.2 million                            | \$33.8 million                            | Draft CIP carries over investments from the previous year, including: \$18.9M for Rail Transformation – Early Action Items (P0940), \$5.1M for Rail Transformation Planning Studies (P0934), \$49.8M for Future Rolling Stock Planning Studies (P0918), as well as funding for two new projects” \$10M for Old Colony Double Track (P2109) and \$10.2M for Transformation Contract Procurement (P1202)—additional funding is needed to advance new projects not included in CIP to advance Regional Rail Phase 1. |
| Arborway Bus Facility Construction Funding | \$34.7 million                            | \$300 million                             | Draft CIP includes \$34.7M for design funding only (P0671b)—additional funding is needed to begin construction of the Arborway facility in FY26.  |
| Systemwide Resiliency                      | \$7.5 million                             | \$250 million                             | Draft CIP includes various targeted investments, including: \$1.5M for Systemwide Climate Resiliency Program (P1205), \$0.5M for Climate Change Resiliency  |



| Project   | Draft CIP FY24-28 Programmed Spend | A Better City Recommended Increase | Notes  |
|---|------------------------------------|------------------------------------|--|
|   |                                    |                                    | Vulnerability Assessment (P0680), \$0.5M for Communications Resiliency Master Plan (P1206), and \$5.0M for Systemwide Drainage Mapping and Repairs Program (P1227)—additional funding is needed to implement completed MBTA climate vulnerability assessments. |
| Red & Orange Line Semi-Automatic Capability & Platform Screen Doors Pilot | \$0                                | \$100 million                      | Recommended new projects not included in CIP   |
| Red-Blue Connector Construction Funding                                   | \$14 million                       | \$300 million                      | Draft CIP includes \$14.1M for planning and initial design only—additional funding is needed to begin construction when design is complete.  |
| <b>Total</b>  |                                    | <b>\$983.8 million</b>             |  |