

April 15, 2026

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



Subject: Comments on the Proposed FY 2027 – 2031 CIP

Secretary Eng and Members of the MBTA Team:

On behalf of A Better City and our 130 member businesses and institutions, thank you for considering our comments on the MBTA’s proposed Capital Investment Plan (CIP). This spending plan represents the primary strategy for maintaining and improving the physical infrastructure that allows for safe, reliable, and efficient public transit service. The CIP is also a statement of priorities for how to address existing deficiencies, as well as future upgrades to support the economy and people in this region.

A Better City members understand that there are limited resources for funding public transit improvements, and we have consistently called for expanding resources available for the MBTA. For many years, we have advocated for additional state aid to support the MBTA’s operating and capital infrastructure needs. We served on the Governor’s Transportation Funding Task Force, which presented actionable recommendations in 2025 and avoided the MBTA’s fiscal cliff, and continue to advocate for new strategies to further optimize Fair Share funding for the MBTA and our statewide transportation system. We can see the benefits from each of these strategies, through additional dollars for public transit, in combination with the capable management and oversight of the current MBTA team—and we are eager for this progress to continue.

In the interest of improving this draft CIP—and better positioning the MBTA to deliver for riders and to keep pace with the Commonwealth’s current decarbonization targets and transit electrification goals—A Better City offers the enclosed comments. As you will see, we first pose some questions we hope the MBTA can address over the next few months before a final vote is taken on this plan, Then we offer specific suggestions for strengthening the impact of this 5-year capital plan.

As always, we stand ready to help refine and advance your priorities to continue to get the ensure MBTA system back on track.

Sincerely,

A handwritten signature in black ink that reads 'Tom Ryan'.

Tom Ryan
Senior Advisor on Policy, Government and Community Affairs
A Better City

Questions

- **What is the process for adding projects and additional spending, if the Governor’s Fair Share proposal is adopted?**

In the last two years, the MBTA approved a CIP only weeks before the Governor signed the annual budget into law. In both years, the state budget included statutory changes related to leveraging Fair Share dollars to increase state borrowing for transportation projects. In 2024, an outside section from the state budget [produced an additional \\$600 million for the MBTA that was approved in October](#). In 2025, [a similar process resulted in another \\$850 million for the MBTA](#). This year, Governor Healey once again is proposing another change in the amount of Fair Share dollars that can be leveraged through the Commonwealth Transportation Fund (CTF), and we understand why this draft CIP does not include any new budget capacity from this proposal.

However, we do wonder what happens if, and hopefully when, this concept does become law. If the MBTA knows the projects and increased capital spending that would be added to the CIP under the Governor’s proposal, the amounts and uses should be listed in this CIP. If the allocation and prioritization are not known yet, how does the MBTA intend to manage that process after the FY27 state budget becomes law?

- **What is the total amount of capital spending requested by MBTA departments?**

In previous years, the MBTA would calculate the total amount of CIP requests that were made by MBTA departments. Knowing this amount helps to provide the proper context for what the draft FY27-31 CIP is able to do, relative to the needs requested by the internal MBTA staff. For example, in the FY25-29 CIP process, MBTA presented a \$9.6 billion plan, but still declared [“Unfunded requests and projects that were not fully funded total over \\$11 \[billion\] across all CIP Programs.”](#)

Knowing the unfunded-but-requested amounts for FY27-31 would be very helpful, especially if grouped by the different categories of spending or by department. This approach of comparing internal budget requests to show a funding gap is similar to how the MBTA explained the fiscal cliff in the operating budget and would help show the size of the need for capital infrastructure.

- **How would this draft CIP impact the current state of good repair backlog?**

It is our understanding that the MBTA provides an official update to the state of good repair (SGR) backlog every three to four years. The last update happened in November 2023, using 2022 dollars, which suggests that the MBTA is currently undergoing an inventory of system assets and preparing an official public update in 2027. The SGR backlog is one number that is consistently used by advocates, elected officials, and MBTA staff to explain the condition of the MBTA system. Based on the investments over the past few years in the Track Improvement Program (TIP), as well as the new buses and Orange Line vehicles, it is reasonable to believe the SGR number could be lower in next year’s update.

Whenever possible, the information from 2023 SGR backlog should still be a guide for this draft CIP. That 2023 report showed 64% of all MBTA assets were beyond a state of good repair, and the largest categories of concern were Facilities (\$6.4 billion), Structures (\$5.3 billion), and Power Systems (\$5.1 billion). The draft FY27-31 CIP uses slightly different categories for “Programmed Spending,” but it should be possible for the final CIP to show how this plan addresses some of the areas of need.

If this draft CIP does make meaningful improvements in the 2023 SGR backlogs, the MBTA should emphasize this, just as if there are areas where the draft CIP is unable to decrease the estimates from the 2023 inventory, the final CIP should also explain this so that any additional funding may be applied to these types of projects (i.e., Power Systems improvement).

Recommendations

If any additional budget capacity were to become available, A Better City recommends considering the following priorities:

- **Additional Funding for SGR, especially Signals, Track and Power Needs:** As mentioned previously, the category for “Power Systems” showed an alarming need in the 2023 SGR report. Only four years ago, the MBTA declared that 76% of power systems were beyond a state of good repair. This area should continue to be a top priority, because when the power system fails even temporarily it causes riders and the general public to lose confidence in the MBTA.
- **Additional Funding for North Side Electric Traction Power Substation (P1433):** The north side of the Commuter Rail system currently lacks the power systems to support electrification of rail service, including the Environmental Justice Corridor, which is a key project in Regional Rail Phase 1. The draft CIP only includes funding for “planning” to deliver a new traction power substation at North Station. This is a critical project and worthy of any additional funding to support this infrastructure.
- **High-Level Platforms at Commuter Rail Stations, including Back Bay Station:** In 2019, the FMCB called for a high-level platform implementation program that would be consistent with Regional Rail and accessible transportation needs. High-level platforms are necessary to get the time-savings benefits of a regional rail system, by reducing dwell time as riders enter and exit trains, and they can benefit riders even before the Commuter Rail system is electrified by the current Rail Modernization schedule. There should be additional funding dedicated and a new project added to the final CIP that increases the resources for this important work, with improvements planned specifically for the platforms at the stations with the highest ridership, like Back Bay Station.
- **Improvements to the Water Ferry System Related to the Water Transportation Study.** The current CIP only includes \$36 million over the entire five years for ferry system improvements. This is insufficient considering the potential of the ferry system to achieve multiple shared goals for transportation mobility and reduction in vehicular traffic. There should be additional budget capacity added throughout the next five years to support the recommendations from the current Water Transportation Study to improve existing ferry routes and infrastructure, as well as achieve a fully accessible water transportation network that meets Americans with Disabilities Act (ADA) standards.
- **Calculate Total Funding Related to Climate Resiliency and Dedicate Additional Funding Highest-Priority System Needs:** The MBTA completed a Vulnerability Assessment Report in 2018 as well as corridor assessments for the Commuter Rail, rapid transit lines, and MBTA facilities. This work identified system vulnerabilities and potential solutions that could be included in future CIP plans. The MBTA must prioritize actions that improve the resilience of the system against the worsening impacts of climate change, including sea level rise, coastal flooding, stormwater flooding, and extreme temperature. Funding for resiliency needs should be calculated as its own program, so that anyone can easily view and measure the amount dedicated to these types of projects. Most importantly, the final CIP should include additional budget capacity in every year of this plan for resiliency needs described in the completed MBTA vulnerability assessment plans.
- **Advance the Red Blue Connector Beyond the Planning Phase:** The draft CIP only includes funding for the planning phase of the Red Blue Connector project, which would mean the project would not be fully prepared to take advantage of any future federal infrastructure support that may become available the next five years. This project remains an opportunity to address a missing piece to the rapid transit system that would help riders, employers, and students throughout the region.