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Attn: Adam Kamoune, Suite 3830, via email: cipengagement@mbta.com

Subject: Comments: Proposed MBTA FY23-27 Capital Investment Plan (CIP)

Dear General Manager Poftak:

The last two years presented unprecedented challenges to MBTA operations and investment programs. Thank you and all the employees at the T for your efforts to surmount the many hurdles brought up by the pandemic.

As the Commonwealth prepares for the new normal, public transit has a critical role to play in facilitating a smooth transition and recovery. Whether it is for work or pleasure, the people in the MBTA service area must be able to afford, access, and rely on safe public transit to get around.

To create the public transit system the region needs and deserved, the MBTA must strategically deploy resources now to advance critical safety, modernization, expansion, and decarbonization efforts. Unfortunately, the proposed FY23-27 CIP falls short of meeting some of these goals.

A Better City urges the MBTA and new Board to adjust the final CIP by delivering sufficient resources to address the following priorities:

1. Provide more information on and fully fund the system's safety needs;
2. Accelerate electrification of the bus system and Commuter Rail;
3. Strengthen the system's resilience to climate change; and
4. Implement infrastructure projects that improve the MBTA's productivity, while also meeting the region's future service needs and demands.

These priorities include projects like Bus Facility Modernization and Battery Electric Bus procurement, Regional Rail phase 1, the Red-Blue Connector, additional investments in the Silver Line to serve the South Boston Waterfront, and advance signals for the Red & Orange line.

Detailed comments are enclosed. Thank you for your consideration and for your leadership.

Yours sincerely,

A handwritten signature in black ink, reading "Richard A. Dimino". The signature is written in a cursive, flowing style with a large initial "R" and "D".

Richard A. Dimino
President & CEO

Detailed Comments on FY23-27 CIP

CIP Development Process

A Better City acknowledges the rigor of the MBTA's capital Investment Plan (CIP) development process, specifically the scoring step that evaluates new funding requests based on “*system, preservation, mobility, cost effectiveness, environmental and health effects, policy, support, social equity, economic impact, and safety.*”ⁱ Taking a holistic, inclusive approach to planning has the potential, when done right, for a well-rounded investment program that moves multiple priority objectives forward simultaneously.

A BETTER CITY RECOMMENDATIONS:

- Consider releasing the quantitative scores for the funding requests, so that the public can better understand the criteria used to include one new project in the CIP over another.ⁱⁱ
- Consider clarifying how this process overlaps with the Climate Resiliency Project Development Process,ⁱⁱⁱ which would further increase transparency related to the allocation of resources to respond to system vulnerabilities.

Presentation of FY23-27 Project List

A BETTER CITY RECOMMENDATIONS:

- Clarify why there are six categories listed as phases covered by the CIP in the project list, i.e. 1) proposed; 2) planning or pre-design; 3) design; 4) procurement; 5) construction; and 6) closeout; yet none of the projects in the CIP are designated as in the “procurement” phase.
- Add a column to show the score given to projects as referenced in the CIP development process.
- Add columns to reference details on the budget planning process and project schedule, including any amendments to the proposed budget, the current budget proposal, and the difference (%) between the two, as well as original start date, current start date, original completion date, and current completion date. This would provide transparency on the real costs of projects, the stage of a project, and the efficacy of project delivery. New York's Metropolitan Transportation Authority includes this information as shown [here](#).

FY23-27 Investment Programs

The MBTA's \$9.4 billion FY23-FY27 CIP allocates resources between two major investment programs: (1) Reliability and Modernization Programs constituting \$8.453 billion in investment over 546 projects (~90% of total CIP dollars); and (2) MBTA Expansion Programs \$953.5 million in investment over 12 projects (~10% of total CIP dollars)

The top 15 projects in the FY23-27 CIP represent 45% of capital investment dollars (\$4.321 billion) for the five-year period. The list includes a mix of projects from the two CIP program areas (five under Reliability and Modernization and two under Expansion), including important safety investments and asset improvements, which A Better City recognizes will help to secure the system, improve productivity, and reduce the MBTA's carbon footprint over the long run.

Further, the Top 15 projects allocate funding to several important *new* investments that were flagged for action by the MTBA and former governance board, e.g. *procurement of Type 10 Green Line cars (P0369)*, *bus transformation actions* (Quincy Bus Facility construction [P0671b], North Cambridge renovations [P0671c], Arborway design [P0671b], limited battery electric bus procurement [P0653]), design work for the *Red-Blue Connector (P0866)*.^{iv}

As the MBTA finalizes the FY23-27 CIP, A Better City urges the Authority to ensure the 5-year investment plan addresses the pressing issues the system faces today and continues to transform the system for the better, underscoring the vital role public transportation plays for people, the regional economy, and our environment.

A BETTER CITY RECOMMENDATIONS:

- Increase the level of funding in the proposed 5-year CIP for some of the above mentioned projects to position the MBTA for success over the years to come.
- Close the significant gaps in the proposed CIP that reflect a lack of urgency to advance critical transformational projects, such as electrification of the Commuter Rail (i.e., Regional Rail), as well as make the necessary level of investments to improve foundational safety functions, safeguard the system against the impacts of climate change, and proactively plan for future major projects.
- Prioritize Regional Rail in the CIP, which if left undone represents a massive hurdle to the Commonwealth in achieving its decarbonization goals by 2050, ignores address serious environmental justice and equity issues, and inhibits the MBTA from providing riders with better, faster, more reliable service. The MBTA presented a timeline for implementation in April 2021, which should be resp adequately funded in this 5-year CIP and beyond. The CIP should contain line items explicitly related to the transformation and electrification of the Phase I lines. The FMCB endorsed this initiative last year and the draft CIP's lack of funding for this Regional Rail is very troubling.
- Do not under invest in safety, resiliency, and major new projects could also leave the MBTA with serious systemwide issues that impact the Authority's ability to provide safe, reliable, and frequent services that meet the future needs and demands of the riding public as well as regional economic and environmental objectives.

Reliability and Modernization Programs

Bridge and Tunnel

Total number of projects: 40 Proposed FY23-27 CIP Funding: \$857M

A Better City recognizes the importance of bridge and tunnel work to the overall functioning of the region's transit system and their vulnerability to growing climate change concerns, in particular flooding from storm surges, precipitation, and sea level rise.

A BETTER CITY RECOMMENDATIONS:

- Ensure funding for CIP item *Systemwide Tunnel Flood Mitigation Program (P0912)* is sufficient to mitigate these issues in a timely manner.

Guideway, Signal, and Power

Total number of projects: 124 Proposed FY23-27 CIP Funding: \$2,179M

This investment category is especially important to ensuring the safety of the MBTA system and the riding public and an area where the Authority must allocate adequate and sustained funding to bring the system into a state of good repair and maintain the system going forward.

A Better City supports investments for the *Green Line Protection (P0370)* system, which requires urgent attention, as well as the projects to address the *resiliency of power systems (P0705)*, and the matching funds for the *Blue Hill Ave Transit Priority Corridor (P1005b)*, highlighted in the category summary. There are other important investments that should figure into the proposed CIP, including more funds to support bus prioritization and maintenance facilities as mentioned below.

A BETTER CITY RECOMMENDATIONS:

Some of the projects funded in the CIP do not reflect the true costs of addressing the challenge.

- Increase funding for the *Red/Orange Line Signal Program (P0284)*, which allocates \$240.5M in FY23-27 for a project that requires approximately \$700M more to fully respond to the needs of the system, including repairs to track and power as well as upgrades needed to meet reliability targets and provide safety benefits. A Better City provides a detailed review of next steps and funding needs in its recent report, [*Positive Signals: A Framework for Advanced Signals & Control for the MBTA Red and Orange Lines*](#). We ask that the final CIP include at least \$125 million to undertake a new Platform Screen Doors Pilot Project at several key Red Line and Orange Line stations.
- Move critical projects such as *Rail Transformation Early Action Items (P0940)* beyond planning over the next five years, which will prevent the MBTA from advancing this crucial

project in time to support the Commonwealth's decarbonization plan and provide the region with better, reliable, and faster service. The MBTA committed to a tentative implementation schedule in [April 2021](#), which included investments to strengthen the Rail transformation team, prepare for an electric multiple unit (EMU) pilot, undertake double-tracking at several stations, construction of high platforms at key ridership stations, EMU procurement, design for an electrified maintenance facility, and a design and preconstruction for Phase 1 of Regional Rail in the FY23-27 CIP. Estimates for implementation of Phase 1 by 2026 are ~2.6 billion, including fleet costs, electrification, platforms, right-of-way expansion, tracks & signals.^v The FY23-27 CIP includes a mere fraction of that amount with only \$134 million allocated to Rail Transformation.

Maintenance and Administrative Facilities

Total number of projects: 77 Proposed FY23-27 CIP Funding: \$1,240M

The FY23-27 CIP includes some important investments to the MBTA's maintenance and administrative facilities, including but exclusively the projects noted in the program highlights, i.e. modernization of the *Quincy Bus Facility (P0671a)*, *Wellington Yard Complete Upgrade (P0514)*, and *Facility Circulation Safety Improvements (P1003)*. This investment category is fundamental to achieving the MBTA stated bus system decarbonization goals and transition a fully battery electric bus (BEB) fleet by 2040 with more than 50% BEB by 2030. A Better City supports the inclusion of *Job Order Contracting (P1112)* in the CIP to address on-call minor repair work at stations and facilities that do not require design and engineering approval.

A BETTER CITY RECOMMENDATIONS:

- Allocate sufficient funding to meet the 2021 MBTA investment estimate of ~ \$4.5 billion, with sustained annual funding, to deliver a modernized bus facility every 2 to 3 years. The FY23-27 CIP includes ~\$450 million for bus facility modernization over the next five years, which will not be sufficient funding to cover meet this goal.
- Include funds for construction for, and not just design of, the new Arborway Bus Maintenance Facility given the MBTA's stated goal is to construct that new facility within the timeframe of this CIP.
- Explore a public-private partnership to help pay for and manage the construction of the new Arborway facility in a way that both better meets neighborhood needs and helps reduce costs to be borne by the MBTA. A Better City provides detailed recommendations for how the MBTA should pursue such mixed-use joint-development projects in its 2019 report, A Better City Report: [New MBTA Bus Maintenance Facilities & Evolving Battery Electric Bus Technology. Case Study: Albany Street Garage.](#)

- Incorporate the ability to service electric trains in the design funds for *Future Regional Rail Layover Planning (P0952)* as well as the *South-Side Commuter Rail Maintenance Facility (P0863)*.

Passenger Facilities

Total number of projects: 87 Proposed FY23-27 CIP Funding: \$920M

This CIP program area, which targets “*rehabilitation and upgrade of MBTA’s stations, stops, and parking facilities*” is critical to customer safety, accessibility, and overall experience on the MBTA system. The projects profiled in the “program highlights” all address these critical issues. Given the recent safety incidents at MBTA stations, the targeted projects in the CIP to take facilities out of commission (*Decommission the Lynn Parking Garage [P1025]*), review the condition of MBTA elevators and escalators and/or replace these assets (*MBTA Vertical Transportation Capital 20 Year Plan [P0636]*, *Elevator Program Multiple Location Design [P0075]*, *Systemwide Stair Repairs [R0029]*), Commuter Rail station improvements that expand access (*Newton Commuter Rail Stations Design [P0170]*, *Natick Center Station Accessibility Project [P0174]*), are welcome and critical investments. Further, the *Bus Priority and Accessibility Improvements (P0613)* that will design and construct dedicated bus lanes in Boston, Chelsea, Somerville, Revere, and Everett will support faster, more reliable, and equitable bus service and could incentivize mode shift from driving to public transit.

A BETTER CITY RECOMMENDATIONS:

- Include design and construction funding for EV Charging and Multi-Modal Infrastructure (e.g. alternative spaces and charging facilities for non-vehicular modes such as bikes and e-bikes) needs assessment, planning study, and design work for stations across the system, including Commuter Rail to support statewide decarbonization goals and transition to electric vehicles, as well as accommodate mode shift.

Vehicles

Total number of projects: 86 Proposed FY23-27 CIP Funding: \$2,368M

The FY23-27 CIP includes procurement for revenue vehicles providing bus, commuter rail, and rapid transit service. Many of the investments in the CIP support (*Red and Orange Line Vehicle Procurement [P0362]*, *Procurement of Battery Electric 40ft Buses and Related Infrastructure [P0653]*, and *Green Line Type 10 Light Rail Fleet Replacement [P0369]*) a safer, more reliable, faster, and more efficient service. Unlike the funds needed to design and construct new bus maintenance facilities, the level of funding in the CIP for bus fleet transformation meets the lower level of investment estimate of \$100 million annually, required to meet the MBTA goal of 100% BEB fleet by 2040.^{vi}

A BETTER CITY RECOMMENDATIONS:

- Procure Electric Multiple Units (EMU) for Providence/Stoughton (PVD) and Fairmount (FRM) line^{vii} to enable implementation of Regional Rail, Phase 1, including Electric Multiple Unit (EMU) pilot. The estimated cost for procurement is \$312 million, which is substantially more than the \$50 million in planning funds allocated in the draft CIP (*Future Rolling Stock Fleet [P0918]*).
- Develop, fund, and implement an EMU procurement schedule to meet a 2030 deadline for 100% procurement of electric vehicles and fully electric commuter rail system by 2040. Consider reallocating all or a portion of funding from *Procurement of 67 Bi-Level Commuter Rail Coaches (P0893)* in the CIP at \$147.M for FY23-FY27 and \$276.1M total authorized budget to support transition to EMUs.
- Stop base *Procurement of Commuter Rail Locomotives (P0380)* and reallocate funding to support transition to 100% electric fleet by 2030 and electrified commuter rail service by 2040.
- Replace all non-revenue vehicles (*Systemwide Non-Revenue Vehicles Program [P1157]*), which include first response vehicles, service cars and trucks, and many other types of vehicles that support operations and maintenance of the system, with electric alternatives when technology exists.

Business and Operational Support

Total number of projects: 87 Proposed FY23-27 CIP Funding: \$920M

The FY23-27 CIP includes investments in systems to improve assessment management, safety and security, and communications. The projects noted in the “program highlights” (*Environmental Compliance Management [90435]*, *New Paratransit Software Solution [P0643]*, *Systemwide Asset Management Program Phase 3 [P0904]*) are all important projects.

A BETTER CITY RECOMMENDATIONS:

- Ensure allocation of funding to implement the MBTA’s Safety Management System (*Safety Management System (SMS) Implementation [P0931]*) is sufficient.
- Include sufficient funding for planning and design work to implement regional rail. The proposed \$5M for *Rail Transformation Planning Studies (P0934)* does not cover the necessary investments for design work for Phase 1, such as \$58M for the Fairmount Line, \$137M for Providence/Stoughton Line, \$132M for Eastern route, \$42M OC bottleneck, \$33M for Worcester Line.^{viii}

Technology and Innovation

Total number of projects: 87 Proposed FY23-27 CIP Funding: \$920M

This investment program area is critical to enhance productivity, modernize, and improve the quality of MBTA service. The program highlights (*Fare Transformation [P0265]*, *Rider Service Alerts Resilience & Improvements [P0689o]*, *IT Infrastructure State of Good Repair [P0944]*) cover important updates to MBTA systems.

A BETTER CITY RECOMMENDATIONS:

- Clarify the allocation of separate funds in the amount of \$6.9M for *Accessible Fare Gate Opener (P0265a)* project that supports pre-design work on a “technology solution to support hands-free operation of fare gates” when \$420.1M is already allocated to the ongoing *Fare Transformation (P0265)* program. It is unclear why this expense is not rolled into the fare transformation contract.

MBTA Expansion Programs

Green Line Extension (GLX)

Total Number of Projects 2 Proposed FY23-27 CIP Funding: \$383M

The expansion of the Green Line to Union Square in Somerville (complete) and College Avenue in Medford is an exciting expansion project that the MBTA is delivering.

A BETTER CITY RECOMMENDATIONS:

- Consider drawing lessons on project implementation and management, costs, and peripheral development such as Transit Oriented Developed (TOD) as the GLX expansion projects comes to an end. Extending and providing better service is a fantastic achievement; however, the MBTA and the Commonwealth must find a way to grow the system and maintain accessibility to housing in affected areas to low-income riders.

South Coast Rail (SCR)

Total Number of Projects 2 Proposed FY23-27 CIP Funding: \$533M

Extending service to Fall River, New Bedford, and Taunton opens the connection to these gateway cities on the South Coast of Massachusetts.

A BETTER CITY RECOMMENDATIONS:

- Incorporate, where relevant, aspects that will support full electrification of the commuter rail system. This project provides an opportunity to lay the foundation and advance regional rail.

- Put a plan in place to make regional rail a reality and reconsider, if possible, the type of coach procurement in the proposed CIP (*South Coast Rail - Coach Procurement [P0160a]*), which currently includes coaches pulled by diesel locomotives. Delaying transition to a fully electric commuter rail system, including procurement of EMUS, will prevent the Commonwealth from achieving its statewide decarbonization goals.
- Mitigate potential bottlenecks at certain key points of the Old Colony line to ensure the benefits of regional rail, i.e. faster service, are achieved and that all communities along the line are served equally.

Expansion Projects

Total Number of Projects 7 Proposed FY23-27 CIP Funding: \$27M

This program area of the CIP is particularly important to the future of the MBTA and its ability to compete for and win competitive grants. It is meant to fund planning and design work for the next MBTA expansion projects. The program highlights showcase two projects: *Silver Line Gateway - Phase 2 (P0496)* and *Red-Blue Connector (P0866)*.

A BETTER CITY RECOMMENDATIONS:

- Expand funding for innovative, new ideas. Lack of action today could leave the MBTA at a disadvantage compared to other transit agencies when competing for federal grants. Only one of the projects in this section—*Red-Blue Connector*—is advancing design of a new mega project. Funding for the Silver Line project is minimal in FY23-27 (\$3.3M). The others referenced are most “closeout” with one funding upgrades to 50 miles of an existing line (*Knowledge Corridor [P0100]*)

CIP Funding Sources

The FY23-27 CIP process comes at an unprecedented moment in time when significant federal dollars are available to advance many of the promises the MBTA has made to the riding public and the Commonwealth since 2015. It is paramount that the MBTA track the Bipartisan Infrastructure Law (BIL) grant opportunities and deadlines, as well as ensure they have a pipeline of competitive projects that align with funding programs to maximize the potential returns for Massachusetts. The five-year CIP should consider and include spending to advance projects that have a good chance of winning competitive federal infrastructure grants that are available now and will continue to be an option in the next four years. The MBTA should take proactive measures to create a team dedicated to this process.

ⁱ [https://cdn.mbtta.com/sites/default/files/2022-03/March%20Board Proposed%20FY23-27%20CIP_03172022%20%282%29.pdf](https://cdn.mbtta.com/sites/default/files/2022-03/March%20Board%20Proposed%20FY23-27%20CIP_03172022%20%282%29.pdf)

ⁱⁱ Note: An overview of the scoring criteria and weights was included in the MBTA presentation of the FY23-27 CIP to the Board of Directors on [March 24, 2022](#), but it does not appear in the CIP document for public comment and there is no indication in either document of a projects score

ⁱⁱⁱ [whttps://cdn.mbtta.com/sites/default/files/2020-12/2020-12-07-fmcb-O-climate-resiliency-program-update-accessible.pdf](https://cdn.mbtta.com/sites/default/files/2020-12/2020-12-07-fmcb-O-climate-resiliency-program-update-accessible.pdf)

^{iv} See, [Keeping the MBTA on Track](#), for detailed recommendations and next steps on some of these important capital projects

^v Figure 1,

<https://static1.squarespace.com/static/533b9a24e4b01d79d0ae4376/t/5ef3731cba31082f9c320924/1593013021884/TransitMatters+RR+Phase+1+200624.pdf>

^{vi} https://cdn.mbtta.com/sites/default/files/2022-03/BFMP_MBTABoard_032422_V3%20%281%29.pdf

^{vii} TransitMatters estimates the need for Providence Line at eight 8-car trainsets and four 4-car trainsets for the Fairmount Line
<https://static1.squarespace.com/static/533b9a24e4b01d79d0ae4376/t/5ef3731cba31082f9c320924/1593013021884/TransitMatters+RR+Phase+1+200624.pdf>

^{viii} Estimates for design work

<https://static1.squarespace.com/static/533b9a24e4b01d79d0ae4376/t/5ef3731cba31082f9c320924/1593013021884/TransitMatters+RR+Phase+1+200624.pdf>