



Thank you for providing the opportunity to comment on the draft Focus40 plan. The Transportation for Massachusetts (T4MA) coalition is comprised of more than 70 organizations from across the state; we advocate for a transportation system that is safe, reliable, convenient, sustainable, and equitable. Consistent with the purpose of Focus40, we support a revitalized MBTA that serves the needs of the region's future. Several of our members and partners commented on the draft plan.

We appreciate the hard work that has gone into this draft document, and the multiple opportunities for substantive input from the public. We are glad that MassDOT and the MBTA are thinking about the future to 2040 and beyond. Overall, the format of the plan is accessible and logically laid out, and it connects to the MBTA's strategic plan, which makes a lot of sense.

Riders and stakeholders should find a lot to be optimistic about in this plan: the Green Line Extension is closer to fruition; 181 new bi-level coaches are coming to the Commuter Rail; the MBTA is piloting and studying electric and battery-electric buses; capacity and reliability investments are headed to the red and orange lines; significant investments in accessibility through the Plan for Accessible Transit Infrastructure (PATI) are planned; and Focus40 addresses climate resilience seriously.

The MBTA is vital to the well-being of its service area, and to the commonwealth as a whole. The T returns a multiple of its capital and operating investments to the region's economy. And recent reforms to the MBTA, such as improving procurement process and bringing several efficiencies to the operating budget, have enabled the MBTA to deliver and plan important system improvements.

That said, in the spirit of constructive feedback, we offer the following comments on the plan:

- Overall, we believe the plan should have more specifics on how these steps will be achieved. The *We're Doing* category is generally funded with real dollars in the MBTA or MassDOT capital plans, but the other categories are not funded. There are no dollar figures in terms of either the costs of investments (some of which are very expensive), or the anticipated available funds. This disconnect from the real issue of long-term funding is concerning. New revenue that was made available by the 2013 Transportation Finance Act is vital in enabling the level of investment the MBTA is able to make in the coming five years. However, this law came short of what was needed in

2013, and the available dollars have been eroded since then. We believe that for the MBTA to achieve the goals laid out in this plan, and to best fulfill its vital mission, Massachusetts will require substantially more resources than are currently available.

Additionally, there are few indications as to how the MBTA will decide which investments it will make, particularly with competing, expensive priorities such as State of Good Repair versus “big ideas.” We hope that this will ultimately be a false choice, but without additional funding we fear they will have to compete.

The scenario planning described on pages 10-12 shows sophisticated thinking, but it needs to go a step further and describe how this will actually work operationally. And it is not clear how the project selection process applies to the eleven “Priority Places.” Finally, we recommend including metrics, like timeframes and dates, to allow measurements that assess for level of success of the plan.

- Page 9: The four goals seem to be the right ones to us, but we recommend fleshing out this page more, particularly describing the historical transportation injustices that make equity so important, and the urgent, high stakes that call for a more environmentally sustainable transportation system.
- Page 27: “Partnerships for Improved First-Mile/Last-Mile Connections” should be moved to the *We’re Doing* category. While the various solutions to this vexing challenge are evolving, and not all are achievable in the next five years, the MBTA should be pursuing these partnerships and solutions immediately.
- Pages 32 and 41: Given that recent cost estimates have actually decreased compared to the previous ones, you should fully consider moving the Red-Blue Connector to the *We’re Planning* category from *We’re Imagining*.
- Page 36: “Reservation and Right-of-Way Expansion for Surface Green Line” is an intriguing concept with many potential benefits. We recommend calling out in the blurb that working with the City of Boston and the Town of Brookline will be vital to its prospects and success.
- Page 43: Consider moving “Additional Capacity Improvements (3-Minute Headways)” to *We’re Doing*. Given the overcrowding on the Orange Line today, it would seem wise to plan for better than 4.5-minute headways on the line sooner rather than later.

- Page 47: We are thrilled about the recent first steps toward improving MBTA bus service and introducing elements of bus rapid transit (BRT). “Priority Bus Rapid Transit Corridors” describes a rollout of BRT elements, such as higher frequency, bus lanes, and transit-signal-priority. While this is certainly part of a long-term endeavor, it seems to make sense to start it in the near-term, so it should be moved to *We’re Doing*.
- Page 50: The Focus40 draft respects the Rail Vision study process and describes how the eventual recommendations will fit in to the MBTA’s plans with Commuter Rail. However, when it comes to the way the Commuter Rail fleet is treated in two cases, the document seems to indicate that decisions have already been made. First, electrification is included only in “We’re Imagining,” seemingly locking this concept in past 2040 when it should be on the table for sooner, depending on the results of the Rail Vision study. Second, diesel and electric multiple units (DMUs and EMUs) are not mentioned in the plan at all. These vehicles could be a key to achieving some of the goals of the Rail Vision study, such as a more “urban rail” type system.
- Page 52: Commuter Rail WiFi is not addressed at all in Focus40. This would indicate that a new Wifi system will not be pursued in the coming decades, which is disappointing.
- Page 55: “Phase 1: Expanded and Better Integrated Multi-Operator Water Transportation Network” should be moved to *We’re Doing*. While the implementation of the Water Transportation Study is not realistically going to be done by 2023, it does not make sense to merely start working to improve the ferry system five years from now.

Again, thank you for providing the opportunity to comment on the Focus40 draft plan, and for the invitation to engage with this process from the beginning. Should you have follow-up questions about T4MA’s comments, please contact Policy Director Charlie Ticotsky at [cticotsky@t4ma.org](mailto:cticotsky@t4ma.org) of 781-354-5155.