

June 10, 2019

Re: Bus Fleet Investments in the 2020-2024 Capital Investment Plan

Submitted electronically via MassCIP@state.ma.us

Dear Secretary Pollack, MassDOT Board of Directors, and Members of the Fiscal and Management Control Board,

Thank you for the opportunity to comment on the 2020-2024 Capital Investment Plan (CIP) that outlines the strategic investment portfolio for improvements to our transportation system. The undersigned represent advocates from environment, environmental justice, transit and public health groups committed to creating an equitable, cleaner transportation system.

While the CIP covers investments for a diverse range of transportation programs, our comments focus on transit bus fleet investments at the Massachusetts Bay Transportation Authority (MBTA) and the 15 Regional Transit Authorities (RTAs). The CIP lists the procurement or delivery of over 900 buses. It is disappointing that only 35 of these bus procurements in the next five years are listed as electric. It is also disappointing that less than \$150 million was included for bus garage replacement in this year's CIP. If the MBTA is serious about bus electrification, real resources need to be directed towards garages equipped for an electric bus fleet. For example, Austin, Texas, plans to roll out around 20 electric buses in the next year, but is also building a facility with the capacity to house 200 electric buses to be able to continue to scale up. At a time when transit agencies across the nation and worldwide are making the shift to zero emission electric buses, our transit fleets remain largely powered by fossil fuel technologies that are a significant source of harmful local air pollution and greenhouse gas emissions.

We need to rapidly decarbonize our transportation sector—the largest source of greenhouse gas emissions in the Commonwealth—if we are to meet the climate goals set by the Global Warming Solutions Act (GWSA) and address the climate emergency. Accelerating the electrification of our transit bus fleet is an effective strategy to lower emissions, improve public health, and modernize our aging bus fleet while reducing operation and maintenance costs. This aligns with the recommendation of the Governor's Commission on the Future of Transportation that calls for establishing a goal for vehicle electrification. And reflects the growing desire of residents across the Commonwealth to transition to cleaner transportation systems.

MBTA Bus Procurements

In addition to the 35 electric buses, the CIP lists two bus procurements—one for 325 buses— from New Flyer and the delivery of 460, 40ft buses. We look forward to information on the timeline and propulsion technologies for these additions to the fleet.

With both the deployment of the five 60 ft. electric buses on the Silver Line and the release of the electric bus feasibility study delayed several times, we are concerned that without a firm commitment to electric buses, near-term bus procurements mentioned in the 2020-2024 CIP will remain tied to a polluting fossil fuel economy for over a decade, hindering substantial progress in reducing toxic pollution and emissions. We urge that the electric bus feasibility study currently underway lay out a clear pathway that supports a phased transition to an electric bus fleet and commits MBTA to all-electric bus purchases by 2030.

MBTA's *Fleet and Facilities Plan* indicates that bus procurements will be aligned with facility improvements. We recommend that MBTA have at least one maintenance garage fully operational for an electric bus fleet by 2020. This will facilitate the planned and necessary transition to all electric bus procurements by 2030. Further, as MBTA analyzes the feasibility of modifying or expanding current garage maintenance facilities and constructing new ones, we urge that all facilities are equipped for the next generation of bus technologies including an electric bus fleet. We also urge MBTA to clarify the total cost of bus facility modernization and replacement program, and identify sources of funding for these important projects.

RTA Bus Procurements

We commend the RTAs for leading the way in electric bus deployment in Massachusetts. Twenty-seven electric buses are in operation or on order at transit agencies in Worcester, Pioneer Valley and Martha's Vineyard.

The 2020-2024 CIP lists around 140 bus replacements across the 15 RTAs. We look forward to further clarification on the propulsion technology for these bus replacements and the timeline for procurements over the next five years. We urge you to add more zero emission electric buses to the fleet as these old buses are replaced and consider alternative procurement models, including leasing options for near-term bus replacements.

Prioritize Electric Bus Deployments in Environmental Justice Communities

The transition to an electric bus fleet should prioritize deployment on routes in environmental justice (EJ) communities that bear the greatest pollution burden. Electric buses should also be prioritized on routes that carry a high volume of passengers. These

routes often pass through low-income neighborhoods that are most dependent on the service.

However, MBTA's planned pilot in North Cambridge will replace electric trolley buses with battery electric buses. This like-for-like replacement will not displace any existing fossil fuel buses on the road. We strongly recommend that the electric bus pilot and subsequent deployments be first rolled out in communities that disproportionately bear the negative health impacts associated with fossil fuel combustion.

Bus Priority and Dedicated Bus Lane Operations

We commend MBTA's efforts to work in partnership with communities to launch pilots testing dedicated bus lanes and other elements of bus rapid transit (BRT) on routes in Cambridge, Watertown, Boston, Everett and Arlington. We offer our strong support for more all-day dedicated bus lanes and other bus priority projects (such as queue jump lanes, level boarding, and full BRT) that will lead to faster and more reliable bus service. With no traffic congestion and predictable time schedules, routes on these dedicated lanes are also perfect candidates for rapid electrification and for incorporation of additional bus priority improvements. To that end, we are pleased to see \$37 million included in the CIP through 2024 for expansion of the Silver Line Gateway, particularly as efforts to implement BRT on Broadway in Everett advance.

In conclusion, it is critical that both near and long-term investments in fleet replacement and expansion take into account impact on public health, emission levels and climate. We urge MassDOT to lead the way in building a reliable, clean and resilient public transit system by advancing the deployment of zero emission electric buses across the state.

Thank you for your consideration.

Sincerely,

Jordan Stutt, Acadia Center
Staci Rubin, Conservation Law Foundation
Eugenia T. Gibbons, Green Energy Consumers Alliance
Julia Wallerice, Institute for Transportation and Development Policy
Andrew R. Grande, Massachusetts Climate Action Network
Matt Casale, MASSPIRG
Paola Massoli and Jack Spence, 350Mass Transportation Working Group
Veena Dharmaraj, Sierra Club, Massachusetts Chapter
Jarred Johnson, TransitMatters