



SMART GROWTH AND REGIONAL COLLABORATION

October 19, 2020

Fiscal and Management Control Board
Massachusetts Bay Transportation Authority
10 Park Plaza, Boston, MA 02116

Board of Directors
Massachusetts Department of Transportation
10 Park Plaza, Boston, MA 02116

Re: Comments on MBTA Forging Ahead Proposal

Dear Members of the Fiscal and Management Control Board and MassDOT Board of Directors:

Thank you for the opportunity to offer comments on the MBTA's "Forging Ahead" plan. We have great respect for the immense challenges faced by transit agencies across the country during this pandemic, and understand additional difficult decisions lie ahead. The Metropolitan Area Planning Council is the regional planning agency serving the people who live and work in the 101 cities and towns of Metropolitan Boston, and we offer the following comments in the hopes that they inform your decisions about how to proceed. This is a summary of our position:

- ***The FMCB and MassDOT Board of Directors must call on the Legislature for more revenue to avoid service cuts and make critical investments in transit;***
- ***Because we are facing such uncertainty about the long-term impact of the pandemic, the FMCB and the MassDOT Board of Directors should not make any decisions that would create a permanent reduction in service; and***
- ***The MBTA must clearly communicate the anticipated scale of any service reduction as well as its plan to restore service.***

Background

Safe, reliable, and accessible transit service is the backbone of a thriving economy, connecting people to jobs, school, and services and anchoring business districts. While the COVID-19 pandemic has dramatically altered how people get around today, it does not negate these fundamental truths about the value of transit. This is especially true for low-income individuals, communities of color, and car-dependent populations, many of whom are the same essential workers who kept our economy afloat during the earliest days of the pandemic. We are glad to see the MBTA recognize the need of vulnerable communities throughout "Forging Ahead" and most of our suggestions are aimed at continued protection of the individuals in our region who rely on transit the most.

We are deeply concerned about reducing transit service in the midst of a pandemic, and the ripple effect it will have across our cities and towns. The Commonwealth is actively moving through the stages of reopening, which means more businesses are opening their doors and more people are returning to work. Despite the fact that more people are working from home, traffic has resurged to only 13% below pre-pandemic levels while light rail service remains at below 50% pre-pandemic levels.¹ This suggests that many commuters are driving instead of taking transit. As our region and Commonwealth continue to reopen while the virus continues to surge, transit service must remain a safe travel option to avoid a worsened congestion crisis and to maintain a safe mode of travel for those who need transit.

¹ <https://mobility-massdot.hub.arcgis.com/>.

This shift toward driving and away from transit stands in direct conflict with the Commonwealth's commitment to achieve net zero greenhouse gas emission by 2050. While the transportation sector is notoriously challenging to decarbonize, now is not the time to lose progress made on reducing transportation emissions and advancing cleaner transportation options. The pandemic has made evidently clear the connection between transportation pollution, air quality, and disparate public health outcomes. MAPC's own research on vehicle air pollution proximity found that 45% of the region's Black residents, 47% of the region's Asian residents, and 54% of the region's Latino residents live in the highest-pollution areas, compared to only 29% of the region's white residents.² Even if we preserve the transit service in the communities that need it most, cuts to service elsewhere still yield a disproportionate public health impact to residents of color.

Furthermore, many cities and towns in the MBTA service area have made significant investments in transit-oriented development, and the efficacy of these investments is predicated on robust transit service. In addition to providing access to jobs, transit often serves as an anchor for business districts and mixed-use neighborhoods. By diminishing that accessibility, or losing it altogether, small businesses will have a hard time attracting patrons, and employees and employers will face difficulties traveling to and from work. Undermining transit-oriented development will also have a direct impact on the Commonwealth's urgent need to produce more housing. MAPC has estimated that Eastern Massachusetts will need to produce 435,000 units of housing by 2030, with a particular focus on affordable and transit-accessible housing. The production of transit-oriented affordable housing is also a crucial component of transportation decarbonization strategy. If demand to live in transit-oriented locations is weakened due to service reduction, our region could see a slowdown in housing production and a return to sprawl. While it is too soon to know the effects of the pandemic on long-term demand for transit-oriented development, the impacts of recessions throughout history have previously been abated by transit investments.

MAPC's Position

Reducing transit service is a consequential decision that will have impacts for years to come. With this, we would like to offer a few thoughts on how the FMCB and MassDOT Board should weigh these decisions to ensure the best outcomes possible:

The FMCB and MassDOT Board of Directors must call on the Legislature for more revenue to avoid service cuts.

We echo General Manager Poftak's call to Congress for an additional \$32 billion in relief for transit agencies³ and have ourselves been advocating at the state and federal level for additional transit relief funding. CARES Act funding provided a vital stopgap for transit agencies to continue to operate safely, but an additional infusion of dollars is critical. We will continue to advocate to our Congressional delegation to advance a relief package that provides more funding for transit agencies. However, funding from the federal government will not provide the long-term financial stability long needed at the MBTA. We implore the FMCB and the MassDOT Board to join us in calling for more transportation revenue from the Massachusetts legislature. We, along with our partners, have been advocating for more revenue for transportation long before this pandemic began. We spent many months working with the legislature to craft a package that would create an infusion of critical new funding for our entire transportation system.

² "Racial Disparities in the Proximity to Vehicle Air Pollution in the MAPC Region,"

<https://www.mapc.org/pollution-disparities-covid19/>.

³ <https://www.bostonglobe.com/2020/09/15/metro/mbta-presses-federal-funds-address-budget-shortfall/>.



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This public health crisis has illuminated the financial fragility of our transportation system, and now is the time to advance these revenue-raising measures.

Because we are facing such uncertainty about the long-term impact of the pandemic, the FMCB and the MassDOT Board of Directors should not make any decisions that would create a permanent reduction in service. We do not yet know the long-term impact the pandemic will have on travel behavior. There are no reliable projections on how we will get around in the future, or how many of us will continue to work from home. We understand the need for the FMCB to make decisions about service levels well in advance of implementation of any changes, and recognize that restoring service similarly takes significant time and resources. However, MAPC cautions the FMCB in declaring any decisions permanent during a time of such uncertainty, especially when we know how hard it is for the MBTA to ramp service up should demand arise.

The MBTA must clearly communicate the anticipated scale of any service reduction as well as its plan to restore service. A great concern is that service cuts implemented in the spring or summer of 2021 will be so severe that it will be difficult to restore more service as ridership potentially increases over the next year. Therefore, as MBTA staff develop the service change options for the board to consider, and for the public to comment on in November, we request that each option include a clear description of the number of MBTA employee positions that will be eliminated, impacts to MBTA assets like rolling stock and stations, the type of improvements and upgrades that will be delayed or eliminated from flexing capital funds to the operating budget, and an estimate of the time it would take to rehire and return rolling stock and other assets to operation. This specificity will help the board, public, and stakeholders better evaluate how flexible each option is in returning service if conditions change.

The long-term consequences of the COVID-19 pandemic on our public transit system will depend on the decisions we make today. We understand the questions facing the FMCB and the MassDOT Board of Directors are tremendously challenging, and we stand ready to partner with you and your colleagues in any way we can be helpful. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Davis". The signature is fluid and cursive, written over a light grey horizontal line.

Rebecca Davis
Interim Executive Director