



Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Monica Tibbitts-Nutt, Secretary & CEO
Phillip Eng, General Manager & CEO



May 9, 2025

Mark Ferroni, Associate Administrator for Planning and Environment
Office of Planning & Environment
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: MBTA progress towards meeting State of Good Repair Targets and executing the MBTA's Transit Asset Management Plan

Dear Associate Administrator Ferroni:

The Massachusetts Bay Transportation Authority (MBTA) is providing this letter to describe the agency's progress toward meeting its Transit Asset Management (TAM) Plan State of Good Repair (SGR) targets, as required by the Infrastructure Investment and Jobs Act (IIJA). FTA's Capital Investment Grants Policy Guidance implements this requirement at the point of a sponsor's request to advance a project into the Engineering phase. This letter supports the request for MBTA's Green Line Transformation (GLT) Core Capacity Program – which, in addition to addressing the Green Line's critical service capacity constraints, will thoroughly modernize the MBTA's light rail fleet by 2035.

MBTA manages a capital asset portfolio consisting of over 75,000 individual assets, nearly 800 miles of revenue track, and more than 44 miles of tunnel. MBTA's approach to asset management is established by seven guiding principles and objectives established in its TAM Plan:

MBTA Asset Management Guiding Principles

	Principle	Objective
1	State of Good Repair	We will work to bring all of the MBTA's assets, including fleets and facilities, to a state of good repair.
2	Transparency	We will ensure that all decisions are data driven, and are both transparent and consistent, enabling us to clearly demonstrate the prioritized investments across asset classes.
3	Service Delivery	We will work to meet or exceed service delivery goals by ensuring necessary work is undertaken for all MBTA assets and opportunities for improving service delivery are considered.
4	Risk Awareness	We will effectively identify, prioritize, and manage asset and asset-related risks, including safety, reliability, financial, performance and climate-related risk.

	Principle	Objective
5	Fiscal Responsibility	We will continue and sustain the MBTA's fiscal discipline by optimizing available resources through lifecycle management, reliability-centered maintenance, business process improvement, and the adoption of other best practices.
6	Social Responsibility	We will work to build the confidence and trust and external stakeholders demonstrating good practice in all that we do
7	Industry Leadership	As one of the largest transit agencies in the US, we will work to achieve compliance with Federal and State requirements demonstrating leadership amongst our peer agencies.

MBTA adopted its most recent TAM Plan in 2022 (attached to this letter). Since that time, MBTA has accomplished the following asset management milestones:

- Completed the 2023 Capital Needs Assessment and Inventory (CNAI) to support investment prioritization and planning. The CNAI is a tool to help the MBTA identify the assets in need of and ready for replacement, and to develop a strategy to prioritize the agency's most critical needs. It includes a calculation of the SGR Index, which reflects the baseline cost necessary to bring all existing assets into SGR. Asset condition and criticality data from the 2023 CNAI is a key input into the FY25-29 CIP scoring and prioritization process and supports the effective allocation of resources to assets most in need.
- Improved upon the lifecycle maintenance planning processes detailed in Section 7 of the TAM.
- Added functionality to the Enterprise Asset Management (EAM) system to support Maintenance of Way and Signals work management of right of way track restrictions.
- Continued further integration of GIS data and systems with the established EAM solution.
- Defined a configuration management approach that is scalable (high criticality vs low criticality) and documents the requirements for establishing, tracking, and managing the configuration of assets over time, including:
 - asset register change management
 - process for establishing the baseline configuration of assets and their attributes
 - process for configuration change control
 - quality assurance of configuration information
- Continued to refine methodology used to determine criticality in the 2023 CNAI so the 2027 CNAI is more accurate and effective.
- Developed a reliability engineering methodology setting out the approach to managing asset reliability, in particular how it relates to MBTA's asset management objectives and the impact of asset reliability on network reliability.
- Established a simple workflow to gather user feedback, prioritize issues, and implement usability changes to the EAM configuration in a way that is consistent and repeatable.

- Added functionality to the EAM system for the specification of an approved configuration for an asset type including components, attributes, and serialized parts. Implemented an approval workflow upon changing the configuration.
- Improved configuration of EAM to accommodate linear assets.
- Defined contractor compliance with project close-out, asset handover, and data requirements to support asset management practices through MBTA's contracting process.
- Added documentation that is transparent, simple, and easily accessible to communicate asset management standards across the organization.
- Developed an internal tracker to maintain and manage condition assessment records, statuses, and outcomes that are accessible to staff within the MBTA.
- Maintained a consistent cycle of EAM system updates and user announcements to ensure the solution is meeting the needs of the MBTA.
- Expanded the classes and types of assets included in the capital asset registry, applying similar standards and documentation for all newly added asset classes and types.
- Identified other systems used in infrastructure inspection, maintenance, and management to be mapped, consolidated, and configured into the current EAM platform.
- Documented and standardized data management process and report development for the annual FTA NTD Report.
- Continued to build out asset management human resources to address the scope and scale of improvement actions identified in the TAM and that are necessary to successfully bring the MBTA's asset management practices to the next level of maturity and competency.
- Defined roles and responsibilities between Engineering and Maintenance, Quality Management, and Asset Management teams so staff can more effectively work together to accomplish the MBTA's operational and strategic goals.
- Developed a standard curriculum to build asset management capacity and competency across the MBTA.
- Expanded the Asset Management presence on MBTA's internal/external facing websites.
- Started remote monitoring pilot of key asset types, intended to reduce staff time necessary for certain inspections and allow for real-time monitoring of infrastructure assets.
- Implemented a network restriction module to better track infrastructure restrictions, provide better data for NTD reporting, and improve management of linear infrastructure assets.

MBTA is proud of the progress it has made toward achieving its asset management targets. The following highlights this progress, and notes planned actions where necessary to meet its targets in the near future:

Vehicles

- MBTA is in the process of significant vehicle replacement. Once vehicle procurement is completed in 2033, the MBTA's entire light rail fleet will be in a state of good repair.
- In addition to the Green Line Transformation program, MBTA is advancing several major revenue vehicle capital programs, including the ongoing replacement and modernization of the Red and Orange Line heavy rail fleets, continued replacement of its bus fleet, Commuter Rail locomotive replacement, and the completion of the bi-level Commuter Rail coach procurement.
- None of MBTA's ferry fleet exceeds its useful life benchmark (ULB).
- MBTA more than met its FY 2024 ULB targets for its bus, light rail, and non-revenue fleets, and missed meeting its commuter rail and heavy rail vehicle targets by less than one percent.
- The MBTA's capital program includes investments in its paratransit fleet, which is expected to result in a future reduction in its paratransit fleet ULB target.

Facilities

- The MBTA met its target for passenger and parking facilities in FY 2024.
- The MBTA has several major capital projects underway at passenger facilities on the transit system, including:
 - The Symphony Station Accessibility Improvements project which will make the Green Line light rail stations fully accessible with new elevators, raised platforms, accessible restrooms, and improved wayfinding.
 - The Jackson Square Accessibility Improvements project on the Orange Line includes the addition of a new elevator, modernization of the existing elevator, and upgrades to life safety systems.
 - The Natick Center Station Accessibility Improvements project will be completed in Spring 2025.
 - Design continues for the rehabilitation of additional commuter rail stations.
- The MBTA met its target for administrative and maintenance facilities in FY 2024. MBTA also has several major investments underway that will continue to improve the condition of such facilities, including major upgrades at the Cabot Maintenance Facility on the Red Line, the Wellington Maintenance Facility on the Orange Line and the Riverside Maintenance Facility on the Green Line.

Infrastructure

Driving down speed restrictions through improvements in maintenance processes, increased track access time, and capital investment will continue to be an area of focus for the agency.

- In 2024, MBTA completed an aggressive Track Improvement Program (TIP) to improve transit track condition and reduce speed restrictions across the system. Since 2023, the MBTA replaced 250,000 feet of rail and removed more than 220 speed restrictions across the system.

- Investments currently underway on the commuter rail system include upgrades to the South Station Tower One interlocking, ongoing implementation of PTC/ATC, systemwide tree removal, track improvements on the Worcester Line, and the replacement of several bridges across the commuter rail system. These investments are expected to improve speed restriction performance on the system.
- The MBTA is advancing major capital projects such as the North Station Draw One Bridge replacement, which will bring this critical asset into a state of good repair and increase safety for riders on the Haverhill, Lowell, Newburyport/Rockport, and Fitchburg Commuter Rail lines.
- Efforts like these have led to the achievement of TAM targets for MBTA's commuter and light rail infrastructure. MBTA missed its heavy rail target by less than 0.6 percent but has set an aggressive target for FY 25 that it is working to achieve.

The MBTA recognizes that while the agency faces several challenges, especially related to the age of our infrastructure and the number of assets in our system, we remain fully committed to improving its condition. To prioritize the safety of our riders, the reliability of our service, and the modernization of our assets, the Authority has made difficult decisions, grounded in asset criticality and our ability to deliver. We look to our robust capital program strategy to generate efficiencies and deliver projects on time and on budget as we face our challenges head-on, using asset information to drive investments and building internal workforce capacity to support State of Good Repair work.

With the advancement of our recapitalization initiatives, the MBTA is making good on this commitment. I hope you agree that we have demonstrated sufficient progress in meeting our TAM performance targets to support MBTA's request for the GLT Core Capacity Program to enter the Engineering phase.

Sincerely,



Phillip Eng
General Manager & CEO
Massachusetts Bay Transportation Authority

CC: Shubha Adhikari, FTA Acting Chief CIG Program Development Division
Denae Brown, FTA General Engineer
Peter Butler, FTA Regional Administrator
Bert Pechhold, FTA General Engineer
Sam Zhou, MBTA Chief Engineer
Jeff Cook, MBTA Chief Administrative Officer
Meredith Sandberg, MBTA Chief of Quality, Compliance & Oversight
Lynsey Heffernan, MBTA Chief of Policy and Strategic Planning
Desiree Patrice, MBTA Chief of Integrated Transit Programs
Matt Conover, Deputy Chief of Green Line & Blue Line Transformation

Enclosures:

MBTA Transit Asset Management Plan (2022)
FY 2023 National Transit Database Narrative Report
FY 2024 National Transit Database Narrative Report
2023 Capital Needs Assessment and Inventory (April 2024)