

November 23, 2020

MBTA Fiscal and Management Control Board  
10 Park Plaza  
Boston, MA 02116

Dear Members of the MBTA Fiscal and Management Control Board,

We are writing relative to the FMCB's consideration of diesel hybrid bus procurements and the release of the MBTA's bus fleet and facilities modernization plan. Changes to the bus fleet and the proposed Battery Electric Bus (BEB) pilot program will have significant impacts on the communities of the 29th Middlesex District. We respectfully ask that the FMCB and MBTA provide more information and allow more time for public discussion before making procurement decisions that have long-term implications for commutes, public health and quality of life in our district and the MBTA service area as a whole.

While we are pleased that the MBTA plans to procure enough buses to provide all-BEB service on major bus routes (71/72/73) that traverse our district, we are also concerned about system-wide greenhouse gas emissions and environmental justice (EJ). Replacing non-electric buses that traverse EJ communities, rather than the electric trolleys on the 71/72/73, would be more effective in reducing emissions and decreasing the air pollution and diesel particulate matter concentrated in EJ communities. As we have seen from the COVID-19 pandemic, air quality has serious and potentially deadly public health consequences. The MBTA has a responsibility to build public health goals into its procurement plan.

Before we can support any changes to the MBTA fleet that would impact the electric trolleybuses currently serving Watertown and Cambridge, we have several questions that we need the MBTA to answer.

- What other bus routes were considered for the BEB pilot program? Given that the trolleybuses serving Watertown, Belmont and Cambridge are already electric, how does it advance the MBTA's electrification goals to replace these buses first, rather than expand the electrified service area?
- We understand that the current electric trolleybuses are approaching the end of their economic lifespan. To what extent did the MBTA consider piloting technologies like in-motion charging for trolleybuses on routes that utilize existing catenary wires?
- How reliant are BEBs on fossil fuels for providing heat to passengers in the cold-weather months? What is the GHG profile of these buses, including the energy required for charging, compared to the current catenary system?
- To what extent will the catenary system be depowered or maintained during the pilot process? What kind of mix of electric and diesel/diesel hybrid buses might 71/72/73 riders experience under different scenarios? Is there a risk that deferred maintenance to the catenary wires during the pilot will result in more financial pressure on the MBTA to remove the system regardless of the success of the BEB pilot?

- What are the benchmarks for assessing performance of an all-BEB route? What metrics will trigger a decision to buy or not buy more BEBs and add them to additional lines? When does the MBTA expect to be able to assess those benchmarks and metrics?
- Could a more aggressive BEB procurement strategy be provisionally pursued now, or could provisionally-planned procurements of diesel hybrid vehicles be adjusted later as data about BEB performance become available?
- How will the MBTA make sure bus routes in EJ communities are among the first to transition to BEBs?

Full electrification of the MBTA's bus fleet is the goal we need to work toward and we would be very pleased for the 29th Middlesex to be a big part of speeding that transformation. However, we need answers to these questions before we can evaluate if this proposal is a net positive for our district and the region as a whole, with environmental justice and public health at top of mind. With the procurements up for a vote today, we are concerned that the MBTA is locking itself into less desirable, diesel-powered alternatives before the first all-BEB routes have a chance to prove themselves one way or another.

We are in favor of the MBTA's pursuing the most aggressive bus electrification plan possible and we look forward to continued dialogue about how the MBTA is planning for this transformation and what actions it is taking now to get there.

Sincerely,

State Representative Jonathan Hecht  
State Representative-Elect Steve Owens  
29th Middlesex District  
Watertown / Cambridge