



U.S. Department  
of Transportation

**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

February 20, 2025

Mr. Phillip Eng  
General Manager  
Massachusetts Bay Transportation Authority  
10 Park Plaza  
Boston, MA 02116

Subject: Approval — Corrective Action Plan Revision for Special Directive 22-4, Finding 4  
(Management Practices: Adequate Time to Complete Necessary MOW Maintenance  
Activities)

Dear Mr. Eng:

The Federal Transit Administration (FTA) has reviewed the Massachusetts Bay Transportation Authority's (MBTA) rewrite and revisions to the corrective action plan (CAP) for Finding 4 from Special Directive (SD) 22-4, issued by the FTA on June 15, 2022. The required action associated with finding 4 says that "MBTA must document its maintenance of way (MOW) maintenance needs and develop and implement a schedule to ensure adequate track access to meet maintenance requirements."

FTA approved MBTA's initial CAP for SD 22-4 Finding 4 on August 10, 2022. On May 30, 2024, MBTA submitted an initial CAP rewrite request to realign actionable items in the CAP based on MBTA's recent lessons learned from previous work under this CAP, the Track Improvement Program (TIP), and diversion planning and execution. MBTA submitted a final CAP rewrite approval request on July 3, 2024, which FTA approved on July 17, 2024.

MBTA submitted the first CAP revision on September 13, 2024. After review and discussion with FTA, MBTA submitted a revised CAP on October 11, 2024. After a November 13, 2024, meeting with MBTA on this revision, FTA requested that MBTA rewrite the CAP and clearly define their maintenance planning approach including the following:

- MOW maintenance needs
- Track access time requirements
- Schedule and implementation plan

Subsequently, MBTA submitted further revisions on December 4, 2024, and December 20, 2024, to address FTA comments. On January 23, FTA requested that MBTA submit their signed CAP with a

supporting submission memo. On February 4, 2025, MBTA submitted the final, signed CAP.

**Approval of CAP Revision, FTA-TRA-25-004**

FTA approves FTA-TRA-25-004 based on a careful review of the revised CAP against the finding and required actions and previously approved CAP that ensured that all required actions from Finding 4 are addressed.

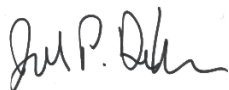
The revised CAP offers a comprehensive approach that focuses on the following:

- Preventive Maintenance and Inspection
- Corrective Maintenance
- Emergency Maintenance
- Renewals
- Track Access Reporting

With final approval of this revised CAP, FTA will archive all previous submissions related to FTA-TRA-22-004 and will open new tracking for MBTA's responses to SD 22-4 Finding 4 based on the action items specified in FTA-TRA-25-004. Please refer to the enclosed CAP evaluation matrix for additional detail.

We appreciate your efforts to enhance MBTA's safety performance, and we look forward to working with you as MBTA continues to improve management practices for MOW maintenance needs to ensure adequate track access to meet maintenance requirements. If you have any questions, please contact our Safety Management Inspection Coordinator, Christian Hernandez, at [christian.hernandez@dot.gov](mailto:christian.hernandez@dot.gov) or (213) 552-3494.

Sincerely,



Joe DeLorenzo  
Associate Administrator and  
Chief Safety Officer  
Office of Transit Safety and Oversight

Enclosure: FTA-TRA-25-004 Corrective Action Plan Evaluation Matrix

cc: Peter Butler, Regional Administrator, FTA Region 1  
Ryan Coholan, Chief Operating Officer, MBTA  
Tim Lesniak, Chief Safety Officer, MBTA  
Meredith Sandberg, Chief of Quality, Compliance, and Oversight, MBTA  
Pat Lavin, Chief Safety Officer, Massachusetts Department of Transportation  
Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)  
Robert Hanson, Rail Safety Director, DPU