

**Baltimore Regional Transit Commission
2024 Report to the Governor and
General Assembly**

**Baltimore, Maryland
December 2024**



December 1, 2024

The Honorable Wes Moore
Governor of Maryland
100 State Circle
Annapolis, Maryland
21401

The Honorable Bill Ferguson
President of the Senate
State House, H-107
100 State Circle
Annapolis, Maryland
21401

The Honorable Adrienne A. Jones
Speaker of the House
State House, H-107
100 State Circle
Annapolis, Maryland
21401

Dear Governor Moore, President Ferguson and Speaker Jones:

On behalf of the Baltimore Regional Transportation Commission (BRTC), I am pleased to transmit to you the BRTC's 2024 annual report. The Commission was established by Chapter 504 of 2023 with two key charges:

1. To engage in advocacy for the Baltimore region public transit systems maintained by the Maryland Transit Administration; and
2. To ensure that the Administration's plans, budgets, decisions, policies, goals, priorities and operations address the public transit needs of residents and businesses in the Baltimore region.

The Commission first met in February of this year, and met monthly thereafter. Committee staff, provided by the Baltimore Metropolitan Council (BMC), worked with MDOT and MTA staff to develop a comprehensive work program that educated our new Commissioners on the intricacies and challenges of MTA's Baltimore area services and allowed the Commission to provide input and comment for the benefit of the system.

Highlights of the BRTC's first year include the hosting of the first meeting of the Maryland Department of Transportation's annual CTP tour, the submission of MTA-specific comments on the draft CTP and an independent report on potential structure and funding of a regional transit authority. Additionally, the BRTC formed three work groups to support distinct aspects of MTA's work.

The BRTC's first year of work comes at a critical time for MTA and for transit in the Baltimore region. MTA, like its peers across the country, continues to recover from pandemic-era drops in ridership at a time when emergency relief from the federal government is coming to an end. Additionally, MTA is facing the realities of aging infrastructure and an ever-growing list of state of good repair needs. Ironically, our first meeting came on the heels of a weeks-long emergency closure of Baltimore's entire light rail system.

At the time of this report's submission, the Administration and General Assembly are preparing to address the most challenging budget climate we have seen in over a decade. With a full understanding of the difficult days ahead, the BRTC is working to ensure that the transit-related solutions do not disproportionately burden the Baltimore region, its businesses, and its transit riders.

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Difficult choices about critical projects will have to be made. The BRTC submits this report not to make these choices harder, but to advocate for the needs of our system. There is challenging work ahead and the BRTC is prepared to do its part in identifying and achieving the best path forward.

Looking ahead, the BRTC is planning its 2025 work program, which is set to include an update to the Central Maryland Regional Transit Plan, analysis of our region's state of good repair needs and renewed collaboration between our locally operated transit services (LOTS).

Should you have any questions or require further information, please do not hesitate to contact me directly.

On behalf of my fellow Commissioners, thank you for the privilege of serving the state and our region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jon Laria', is written over a light gray rectangular background.

Jon Laria
Chair

cc: Mr. Paul J. Weidefeld, Secretary, Maryland Department of Transportation
Ms. Holly Arnold, Administrator, Maryland Transit Administration
Commissioners, Baltimore Regional Transit Commission

Baltimore Regional Transit Commission 2024 Membership Roster

Jon Laria, Chair (Baltimore City, appointed by Governor)
D'Andrea L. Walker, Vice-Chair (Baltimore County, appointed by County Executive)

Appointed by Governor
From Anne Arundel County
Markus G. Moore

From Baltimore City
Luis O. Cardona
Lester Davis

From Baltimore County
Toni R. St. John
Aaron N. Tomarchio

From Howard County
Lakey Boyd

Appointed by Anne Arundel County Executive
Arjan van Andel

Appointed by Baltimore City Mayor
Celeste Chavis, Ph.D.
Simone C. Johnson
Scot T. Spencer

Appointed by Baltimore County Executive
Michael N. Netzer

Appointed by Howard County Executive
Clarence (Trey) Dickerson

Ex Officio Members
Tony Bridges, designee of Secretary of Transportation
Michael McMillan (non-voting), designee of the Amalgamated Transit Union

Baltimore Metropolitan Council Staff to the Workgroup
Don Halligan
Jake Schutt
Ashley Roach

Introduction

Background

In October 2023, the Baltimore Regional Transit Commission was authorized by the General Assembly ([Chapter 504, Acts of 2023](#)).

The BRTC advocates for the Baltimore region public transit systems maintained by the [Maryland Transit Administration](#). It requests and reviews information from the Annual Attainment Report and the Maryland Transit Administration concerning the attainment of Administration goals, including performance goals and metrics. It also evaluates other measures of the performance of the Baltimore region transit system; and issues written recommendations concerning how the results of the BRTC's review and evaluation should influence the Administration's priorities in future years.

On a quarterly basis, the BRTC reviews and comments on Maryland Transit Administration proposals and reports of changes in service. As part of the development of the draft and final *Consolidated Transportation Program*, the BRTC reviews and comments on the Administration's annual operating and capital budget requests for the Baltimore region, including those for bus, light rail, Metro, commuter bus, MARC service, and paratransit.

Further, the BRTC reviews and approves any update to the Central Maryland Regional Transit Plan; reviews and comments on the Capital Needs Inventory Report; and reviews local transit plans and services in the Baltimore region to ensure coordination between the local transit services and the Maryland Transit Administration. In carrying out its duties, the BRTC strives to ensure that the Maryland Transit Administration's plans, budgets, decisions, policies, goals, priorities, operations, and services address the public transit needs of residents and businesses in the Baltimore region.

The BRTC has seventeen members. The Chair and Vice-Chair are chosen by the BRTC every two years (Code Transportation Article, sec. 7-213).

The BRTC is housed and staffed by the [Baltimore Metropolitan Council](#). All minutes and other proper records are maintained on the Baltimore Metropolitan Council's website (<https://www.baltometro.org/transportation/committees/baltimore-regional-transit-commission>).

MTA Structure, History and Functions

The Maryland Transit Administration (MTA) is a division of the Maryland Department of Transportation. MTA's Administrator is appointed by the Secretary of Transportation with the approval of the Governor. MTA does not have a board of directors, which makes it unique among large transit agencies in the United States.

MTA operates Local Buses (CityLink and LocalLink), Commuter Buses, Light Rail, Metro Subway, Maryland Area Regional Commuter (MARC) Train Service, and a comprehensive Paratransit (MobilityLink) system. MTA also manages the Taxi Access system, and directs funding and statewide assistance to Locally Operated Transit Systems (LOTS) in each of Maryland's 23 counties, Baltimore City, Annapolis and Ocean City.

The MTA is structured into several key divisions, each responsible for different aspects of transit operations:

Bus Services: This division manages the extensive network of local and commuter bus routes, ensuring reliable and efficient service across urban and suburban areas.

Rail Services: This includes the operation of light rail, metro subway, and commuter rail services, providing rapid transit options for daily commuters and travelers.

Paratransit Services: The MTA offers specialized transportation for individuals with disabilities, ensuring accessibility and mobility for all residents.

Administrative and Support Services: This division handles the administrative functions, including planning, finance, human resources, and customer service, ensuring the smooth operation of the entire agency.

MTA's "core service" area covers 1,795 square miles and serves over 2.2 million people within Anne Arundel County, Baltimore City, and Baltimore County with commuter bus service to Howard County. The Baltimore region is the 23rd largest metropolitan region in the United States, while MTA's core service itself constitutes the 12th largest multi-modal transit system in the Country. According to the current CTP, MTA's statewide FY25 capital budget is \$656 million and the statewide FY25 operating budget is \$1.28 billion. The BRTC estimates that the FY25 capital investment in Baltimore area transit is \$285.3 million. Estimated FY25 operating costs for Baltimore core services is \$864.3 million.

Formation of the Baltimore Regional Transit Commission

The BRTC was authorized in October of 2023. BMC staff spent the initial months working with MTA to develop a scope and schedule of work, orientation materials and organizational documents for the BRTC. The MTA's relationship with the BRTC is collaborative, with the Commission providing advice and advisory oversight on budget allocations, policy decisions, and community engagement strategies to ensure that the needs of Baltimore's diverse transit riders are met effectively.

Appointments were complete by January 31, 2024.

The BRTC initially met in February 2024 and met monthly through the remainder of the year. Jon Laria, an appointee of the Governor, was elected Chair in February. D'Andrea Walker, an appointee of Baltimore County Executive Johnny Olszewski, was elected Vice-Chair at the BRTC's May meeting.

The BRTC adopted bylaws in June 2024.

Role of the Baltimore Regional Transit Commission

The BRTC's enabling legislation requires it to "engage in advocacy for the Baltimore region public transit systems maintained by the Administration." In pursuing this advocacy, the BRTC "shall endeavor to ensure that the Administration's plans, budgets, decisions, policies, goals, priorities and operations address the public transit needs of residents and businesses in the Baltimore region."

Included in this statutory charge to advocate for and support Baltimore regional transit are six specific tasks to be undertaken by the BRTC each year. These activities are to:

- Review and comment on service change reports and proposals

- Review and comment on the Administration's Annual operating and capital budget request
- Review and approve any update to the Central Maryland Regional Transit Plan
- Review and comment on the capital needs inventory
- Review local transit plans and services in the Baltimore region to ensure coordination between local transit services and the administration

2024 Work Program and Accomplishments

The BRTC's 2024 work program consisted of three major components.

1. Orientation and Organization
2. Completion of Statutory Charges
3. Analysis and Advocacy

Orientation and Organization

The Maryland Transit Administration is one of the 20 largest transit agencies in the United States and it operates and supports a complex mix of services throughout the region. An early priority of BRTC staff and leadership was to help our Commissioners develop a familiarity and understanding of transit in the Baltimore region.

Upon their appointment, each Commissioner took part in a written and in-person orientation focused on the MTA's structure, operations, and budget. At each meeting of the BRTC, time in each agenda was specifically dedicated to enhancing the Commissioners' knowledge of MTA and transit policy. Additionally, Commissioners took part in tours of MTA facilities and infrastructure to better understand the needs of the agency and its employees.

Over the summer months, BRTC staff worked with MTA and the Commissioners to establish standing workgroups designed to support MTA. The workgroups are: Project & Program Delivery; Employee Hiring Retention and Recruitment; and Rider Experience. The workgroups met for the second half of the year. Their focus and work program are summarized below.

Project and Program Delivery.

The Project & Program Delivery working group is focused on reviewing the delivery of major MTA projects and programs within the core service. Specifically, this working group has explored the MTA procurement process, property management, tort liability issues and the progress of the Red Line project, and advocated for the completion of key capital projects delayed due to funding barriers.

The workgroup's 2025 work program will focus on ways to streamline project delivery, address tort liabilities facing MTA, and identify opportunities for more efficient procurement.

Employee Hiring, Retention & Recruitment.

The Staffing workgroup was created to support the MTA in building and maintaining a skilled and motivated workforce. Its primary objective is to update the 2022 Salary and Staffing Report, evaluating MTA's salary structures, recruitment and retention policies, and examine industry best practices.

By analyzing salary competitiveness and the impact of existing employment incentives, the workgroup aims to identify areas where MTA can improve compensation and employment conditions, supporting long-term workforce sustainability. Legislative and administrative recommendations that strengthen

MTA's appeal as an employer will also be a priority. *Collective bargaining considerations remain outside the workgroup's scope.*

BRTC staff is leading the update to the 2022 Salary and Staffing Report.

Rider Experience

The Rider Experience workgroup is focused on assessing the quality of service provided to MTA's diverse ridership. Key areas of focus of the work group include service performance metrics, marketing and communication and the evaluation of proposed service changes.

The workgroup finds great value in its ongoing interaction with MTA's Rider Experience team and plans to integrate rider feedback into updates for the Central Maryland Regional Transit Plan (CMRTP).

Completion of Statutory Charges

1. Request and review information from the Annual Attainment Report.

MDOT publishes an annual Attainment Report on Transportation System Performance (AR) to identify successes, challenges, and strategies for improving the transportation services delivered to Maryland residents.

The BRTC reviewed information related to the AR at each of its meetings in 2024. The BRTC was particularly focused on service delivery, on time performance and ridership.

Service Delivery is measured as a percentage of scheduled hours that were actually operated. The two primary sources of non-operation are shortages of operators and vehicles. Light Rail and Metro's service delivery was 92% and the Bus service delivery was 94%. By this metric, MTA's Baltimore area transit performs well relative to national peers.

On Time Performance tracks how often transit modes are running on schedule. This is a direct reflection of system reliability. Of the major transit modes in our region, only Mobility service met its goal. Bus service, at 72% falls eight percentage points short of its goal of 80%. Light Rail, at 92% is only three percentages short of its goal of 95%. Metro service, at 83% falls twelve points short of its goal of 95%.

Ridership is an accounting of the number of people who board a public transit vehicle. Ridership saw an overall increase of 13.4% from September 2023 to September 2024. The most significant gains were observed on Metro and Light Rail systems. Core bus ridership, which saw the smallest drop offs during the pandemic, remains one of the nation's most ridden bus services. Overall, ridership has not yet returned to pre-pandemic levels.

The BRTC received monthly updates on a series of measures, including those listed above. These updates will continue in 2025 and the BRTC looks forward to the year-over-year comparisons.

2. Review and comment on service change reports and proposals

MTA makes service adjustments on a quarterly, or seasonal basis. Prior to their implementation, the service changes are publicly proposed and MTA pays particular attention to informing the communities directly impacted by the changes.

This year, the BRTC had the opportunity to review and comment on MTA's proposed Fall service changes.

The BRTC found the proposed changes to be thoughtful and well presented. Of note were the proposal to make the QuickLink 40 a permanent service and comprehensive service enhancements and adjustments that improved the current system and optimized safety and operations.

The BRTC appreciated the opportunity to review this information in a timely fashion and looks forward to the opportunity to do so again in 2025.

3. Review and Comment on the Administration's annual operating and capital budget request

In addition to including the Consolidated Transportation Program (CTP) on a meeting agenda, the BRTC is required to review and comment on the Administration's annual operating and capital budget requests for the Baltimore region as part of the development of the draft and final CTP.

In its initial year, the BRTC had mixed success meeting the requirements of the legislation.

The BRTC requested, but was not provided, a copy of the MTA's annual budget request to MDOT. Without this document, the BRTC was unable to effectively fulfill its obligation to "review and comment on the annual operating and capital budget request for the Baltimore region." Typically, large transit agencies, including our peers at WMATA, have a board level and/or public presentation of their budget request prior to submission. This simple, but key step is necessary for the oversight body and other stakeholders to effectively advocate for the system.

The BRTC did receive a briefing focused on MTA's portion of draft CTP in September. The Department characterized this briefing as the first of their annual CTP tour meetings. The BRTC reviewed the draft CTP and submitted comments on the document.

With the understanding that this is a particularly challenging budget year, the BRTC expressed two major concerns. First, the proposed \$672 million cuts to Baltimore area MTA services are detrimental to our shared goals of equity, economic growth and environmental sustainability. Second, the lack of funding for critical bus and rail state of good repair projects fail to meet legislative requirements and pose a particular threat to the functioning of the system. The cuts to light rail and bus maintenance facilities are of particular concern. Given the enhanced role state of good repair plays in the evaluation of federal new starts programs, these cuts also endanger the plans for a future Red Line.

A copy of the BRTC's written comments is attached to this report as Attachment 1.

4. Review and Approve and update to the Central Maryland Regional Transit Plan

The Central Maryland Regional Transit plan was established in 2018 and is a requirement of the Maryland Metro/Transit Funding Act (Chapter 352). The legislation mandates the Maryland Transit Administration to develop a regional plan to meet the needs of the core service area. The first iteration of the plan was completed and submitted to the Maryland General Assembly in 2020.

The BRTC was briefed on the status of the plan and told that the next update will be undertaken in 2025. The BRTC expects this to be a significant portion of the work program in the next year and has worked with MTA to develop a timeline to complete the plan update by the close of 2025.

5. Review and comment on the capital needs inventory

The purpose of the Capital Needs Inventory Report (CNI) is to assess MTA's ongoing unconstrained capital needs over a 10-year period. It presents information from MTA's ongoing Transit Asset Management (TAM) analyses and Call for Projects (CFP) process. The CNI is intended to support improved decision-making regarding the maintenance and improvements of MTA's assets over the long term. State law requires the CNI to be updated every three years. The next scheduled update is 2025.

The BRTC discussed the CNI at its March meeting. In 2022 the CNI estimated MTA's annual state of good repair needs would be \$512 million. This estimate excluded major initiatives including the Purple Line, Red Line and the Frederick Douglass Tunnel. At the BRTC's March meeting MTA reported that the new ten year state of good repair estimate was \$9.8 billion, or \$980 million per year on an annualized basis. This estimate is nearly double the 2022 estimate.

The BRTC expects the update to the CNI to be a major focus in 2025.

6. Review local transit plans and services in the Baltimore region to ensure coordination between local transit services and the administration

In addition to the core transit service operated by MTA, local government partners in the region operate their own service through agencies know as Locally Operated Transit Services (LOTS). LOTS agencies receive their funding through MTA and MTA is in the process of updating the formula through which these funds are allocated.

Coordination of local transit agencies, plans and services was discussed at multiple meetings of the BRTC this year. A substantial review of locally operated transit systems in our region is scheduled for 2025 and the BRTC is considering forming an internal workgroup focused on LOTS service. The revised LOTS formula is of particular interest to the local government partners on the workgroup.

Advocacy and Research

Advocacy for Baltimore Area Transit

The BRTC was an active transit advocate throughout the year. The chair testified on several bills during the legislative session and made efforts to introduce the BRTC to

legislators and chamber leadership. Much of the focus during our initial legislative was on MTA's capital needs and the CTP.

Beyond Annapolis, the Commission worked closely with the member jurisdictions of the Baltimore Metropolitan Council, participated in a host of transit-related public forums and worked to leverage the strength and support of our region's business community.

Throughout the year, BRTC staff and leadership met with senior MTA and MDOT officials on numerous issues within the BRTC's purview.

In 2025 the BRTC will continue to expand its role as an advocate for and supporter of public transportation in our region.

Study of Regional Transit Authorities

Maryland is one of a few states to own and operate the major transit service in a large metropolitan area. Typically these services are managed by independent authorities, local government or a hybrid of state and local government. This dynamic has created a series of challenges ranging from a lack of connection between local land use and state transit and consistently inadequate funding.

The Baltimore Metropolitan Council, the BRTC's host agency, has funded a series of reports and workgroups to study this issue, including the workgroup that gave rise to the BRTC. In 2024, the BRTC itself took on the task of studying transit funding and governance in our region and commissioned a new report on the subject.

The BRTC report will be released in December 2024. The report will identify models for funding and governance reform that will enhance the partnership between state and local government and identify potential funding sources to address both state of good repair and future expansion.

Recommendations and Conclusion

In its first year of operation, the BRTC undertook an aggressive and comprehensive work program designed to quickly educate its members on the intricacies of transit policy and produce useful work product and comment for the administration. The BRTC would be remiss if it did not recognize the direct support it received from the staff of the Baltimore Metropolitan Council and the partnership the Maryland Transit Administration.

A consistent theme in the BRTC's meetings was the reality that MTA performs admirable work in challenging circumstances. A combination of aging infrastructure, long-deferred maintenance, workforce shortages and diminishing funding have placed the Baltimore region's MTA service in a precarious position.

MTA's 10-year state of good repair needs – the amount of money for unfunded repair and maintenance - have nearly doubled since 2022 and now total nearly \$10 billion, or nearly \$1 billion annually. This growth in state of good repair need comes as MTA is facing cuts in the proposed CTP totaling \$672 million. Major projects cut in the draft CTP include the following:

1. Light rail rehabilitation and upgrades. Long planned improvements to our light rail system totaling \$67.2 million. These upgrades must be made in order for our system to replace our existing thirty-three year old fleet of vehicles. Also included in these cuts are traction power substation repairs necessary to provide power to the trains.
2. Bus electrification projects totaling \$206 million. This includes all funds for the statutorily required conversion of our fleet to zero-emission buses.
3. Replacement of our Eastern Bus Facility. The current facility is over eighty years old and houses maintenance operations for over 170 buses. The \$201 million replacement project was tied to the electrification of our fleet. With electrification on hold, this facility remains beyond its useful life.

Additional cuts include elevator and escalator repairs required to provide access to stations and MARC maintenance facility upgrades.

The BRTC finds the MTA's growing state of good repair needs alarming and unsustainable; they must be addressed in serious fashion before more harm occurs to our system.

While the BRTC is a strong proponent of robust statewide funding for transit, we must again call attention to the disparate treatment of MTA's Baltimore area transit service. The rising cost of the Purple Line and the State's increased financial commitment to WMATA have left MTA's core service area in the unenviable position of doing more with less. The Purple Line now accounts for nearly 50% of MTA's state dollars and WMATA has seen an increase in funding from both the Transportation Trust Fund and the State's General Fund. Again, the BRTC does not begrudge any part of the State its proportionate transit investment, but we have a duty to highlight the fact that the Baltimore region's transit program is facing crippling cuts while our sister agencies see their allotment of state dollars grow.

Beyond these harsh budget realities, the MTA receives unequal treatment in regulation and statute. Unlike WMATA and MDOT modes including the State Highway Administration and the Maryland Transportation Authority, MTA is not included in the Maryland Tort Claims Act. This inequitable legal exposure puts MTA at a huge disadvantage on an annual basis relative to other MDOT modes. Similarly, while MDOT and the Maryland Port Administration are considered “primary procurement units” by the State, MTA is not. This simple distinction requires MTA to undertake procurements that are more costly and time consuming than their peers, hardly an enviable situation for an agency forced to maximize their budget and efficiency each and every year.

Finally, the BRTC urges continued discussion and evaluation of MTA governance. While the BRTC has been a positive force for Baltimore area transit in our first year, the limitations of a wholly-state-controlled transit agency still hold our system back. For our region to maximize the benefits of mass transit, we must continue to bridge the gap between the state’s transit investment and local land use decisions. The BRTC can help, but not completely solve, this challenge. More significantly, the BRTC, without budget approval authority, is hampered in its efforts to advocate for transit service. Despite our best efforts, we were unable to effectively participate in the development of MTA’s annual budget. We do not know whether earlier input would have made a difference in the final result, but we do know that the draft CTP made significant cuts to MTA Baltimore service, while transit investment in other areas of the state remained whole. MTA’s lack of a formal oversight board and public budget process continues to make it an easy target for capital and operational cuts. We urge Administration and Legislative leadership to review the options in our upcoming governance and funding report and consider them in any upcoming changes.

The BRTC implores the Administration and General Assembly to address these issues through a combination of administrative action, legislative changes and the work of the reconstituted TRAIN Commission. In light of the current budget challenges this work will not be easy. The demands of the budget cycle will undoubtedly require difficult decisions on long promised projects such as the Red Line. These decisions will not come lightly, and we trust that the Administration will make them with every due consideration. The Commission stands ready to participate actively in these conversations and to help however we can.

ATTACHMENT 1



November 7, 2024

Secretary Paul J. Wiedefeld
Maryland Department of Transportation
7201 Corporate Center Drive
Hanover, MD 21076

RE: Baltimore Regional Transit Commission Comments on Draft FY 2025-2030 CTP

Dear Secretary Wiedefeld:

Thank you for including the Baltimore Regional Transit Commission (BRTC) in MDOT's CTP "tour" in connection with the Draft FY 2025-2030 Consolidated Transportation Program (CTP). As you know, Transportation Article, Section 7-213(G)(9) of the Annotated Code of Maryland directs the BRTC to "...review and comment on [MTA]'s annual operating and capital budget request for the Baltimore region, including bus, light rail, metro, commuter bus, MARC service, and paratransit as part of the development of the draft and final Consolidated Transportation Program." We appreciate MDOT's efforts to help us fulfill that mandate in the BRTC's first year of existence, and look forward to continued improvements in the process next year and beyond.

The Commission has now reviewed the Draft CTP as it pertains to MTA. Unfortunately, this review has left us gravely concerned about the impact of the proposed cuts on MTA and its millions of monthly riders.

The Stakes

The Draft CTP, which contains MTA cuts totaling \$672 million to Baltimore Region core services, is detrimental to our shared goals with respect to equity, economic growth, and the environment.

Equity

The Commission strongly believes that the proposed cuts will disproportionately harm vulnerable communities which have suffered historic disinvestment, and are already underserved by transit and other public services. Based on MTA's Origin and Destination Study, 86% of Core Mode riders do not have a car available for their trip, and transit is their only lifeline to employment, education, and essential services.

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Economic Growth

The proposed cuts also threaten the Baltimore Region's economic growth. Whether it is workers traveling to and from the airport or Hunt Valley, employees getting to Johns Hopkins or University of Maryland medical centers, visitors going to the Convention Center, CFG Arena and our major stadiums, or students getting to and from school and college, a healthy transit system is a critical part of the economic equation for the region. We know that businesses making investment decisions typically emphasize regional transit capacity in their decision-making, as do the employees that businesses and institutions need to attract and retain. Also, investing in a robust public transit system is essential to driving long-term economic, environmental, social, and health benefits. Research shows that every \$1 invested in public transit generates \$5 in economic returns, including increased business activity and higher property values.

The Environment

Transit investments also help reduce greenhouse gas emissions and air pollution. For example, a significant investment in transit could reduce greenhouse gas emissions by as much as 11%, making substantial progress toward Maryland's climate goals. Public transit also promotes sustainable urban development by reducing reliance on cars, decreasing traffic congestion, and curbing urban sprawl.

The Proposed Cuts

MTA's summary of the \$672 million in proposed cuts, attached to this letter as [Exhibit A](#) (the "**MTA Summary**"), shows cuts of approximately \$69 million for Light Rail, \$410 million for Bus, \$64 million for Metro, and \$67 million for MARC. Representative cuts include:

- Metro elevators and escalators (\$34.74 million)
- MARC Riverside upgrades (\$20.4 million)
- MARC railcar mid-life overhaul (\$44.6 million)
- Eastern Bus Facility replacement (\$201.27 million)
- Zero-Emission Bus procurement (\$205.75 million)
- Light Rail System Rehabilitation including Howard Street Rail Replacement (\$62.40 million)
- Light Rail Traction Power Substation Repair (\$4.8 million)

At the Commission's request, the attached MTA Summary also lists projected impacts of each cut, including:

- unplanned system shutdowns
- service disruptions
- increased community complaints
- regulatory risk (environmental compliance)
- communications blackouts
- more short-term spending on corrective maintenance



With respect to desperately-needed replacement of 81 elevators and escalators throughout Metro, MTA says: *“MTA no longer has a plan for rehabilitating escalators; should they break beyond what can be handled by our maintenance contracts, they will be out of service indefinitely.”*

With respect to rehabilitation of the Light Rail Traction Power Substations (TPSS), MTA says: *“Delay of this investment could mean shutdowns if there are any TPSS failures. MTA is currently operating with the minimum number of TPSS to provide service.”*¹

Also with respect to Light Rail, MTA states that *“components of the light rail system were identified to be in danger of malfunctioning or reaching ‘condition black’, on an inspection (the state at which the MTA cannot operate the system due to safety concerns.”*

With respect to the deferred replacement of the outdated and inefficient Eastern Bus Facility, MTA says: *“We will have to invest millions of dollars in the current Eastern facility in order to keep it operating – that full cost is not yet known.”*

The Eastern Bus Facility is just one example where the MTA Summary concludes that making cuts now will necessitate unrecoverable short-term or emergency expenditures. These only serve to drain precious resources from critical longer-term investments.

MTA’s 2022 Capital Needs Inventory (CNI) identified an annual need of \$512 million in capital improvements over ten years, to achieve system State of Good Repair (SOGR). \$368 million more is needed in the Draft CTP just to meet 2022 CNI targets, which are expected to increase to over \$900 million annually when the CNI is updated in 2025.

The Draft CTP also violates the SOGR funding levels mandated by the Transit Safety and Investment Act of 2021 (TSIA), which required \$450 million in FY 2025 and FY 2026. With \$336 million allocated for FY25 and \$376 million allocated for FY26, the Draft CTP falls short of TSIA by \$188 million across those two budget years.

We were especially concerned to learn that the Draft CTP does not fund critical Light Rail SOGR projects necessary to move forward with the procurement of new light rail cars for which MTA has received a \$213 million federal grant. MTA estimates that \$380 million must be added to the CTP to avoid forfeiture of that hard-won grant, and says we have no more than a year to make that additional commitment before the federal grant is at risk.

Achieving a State of Good Repair is also extremely important when applying for federal Capital Investment Grants, where it is a key factor in determining eligibility and competitiveness. In allocating new capital funds for expansion, the Federal Transit Administration prioritizes projects that demonstrate a commitment to maintaining existing infrastructure in good condition.

¹ BRTC Commissioners visited MTA’s North Avenue Light Rail Yard on October 28, 2024 and saw one completely burned-out power substation and another that engineers consider on the verge of failure. Should it fail, Light Rail cars will be unable to transfer between the Yard and the system’s main line where they provide service, and Light Rail would shut down completely and indefinitely. Apparently, no funds are budgeted to replace the substation.



Therefore, failing to achieve SOGR is a direct threat to necessary expansion, including the critically important Red Line.

As you know, the Commission has also wrestled with the relative positions of WMATA and MTA, Maryland's two major transit systems. The Commission urges that the disparate funding structures for WMATA and MTA, and the implications of the disparity, be fully evaluated. We certainly should not pit one region's transit against another, and the Commission recognizes that WMATA has many legitimate funding needs that are not being fulfilled. Nonetheless, the Commission sees basic inequities in how these "sister systems" are funded, and believes that a full and fair evaluation is necessary to ensure equity for MTA's Baltimore Region stakeholders.

Please know that we fully recognize the serious fiscal constraints facing MDOT and the State, and deeply appreciate your personal and professional commitment to adequate transit funding. We appreciate that, because of declining revenues, you and the entire Moore-Miller Administration must make difficult and unwanted choices. **We firmly believe the solution must include more revenues for Maryland transit and transportation, and look forward to supporting the work of the TRAIN Commission and related actions by the General Assembly and Administration to achieve that goal.**

We cannot close without commending the efforts of devoted MDOT and MTA staff who work every day, in a badly under-resourced system, to deliver essential services to their fellow Marylanders. Their dedication to the agency's mission is evident, and much appreciated.

Thank you again for the opportunity to comment on the Draft CTP. The Commission looks forward to working with you to achieve a Final CTP that responds to the concerns we and many others have expressed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jon Laria', is written over a horizontal line.

Jon Laria
Chair, Baltimore Regional Transit Commission

cc: BRTC Commissioners



Exhibit A

Summary of MTA Cuts and Their Impact

MTA CTP Project Deferrals									
Mode	Project Name	Description	Impacts	FY25	FY26	FY27	FY28	FY29	Total 6 Year
MARC	MARC Riverside Upgrades - Wayside Power, Yard Air, Environmental	Upgrades include Wayside Power, Yard Air, Tank Overhaul, and Replacement of Diesel Filtration System to improve community concerns near the facility.	Increased community complaints regarding the facility. Potential for regulatory risk if environmental work is not completed at the wastewater treatment plant.	\$ (6,322,019)	\$ (13,597,981)	\$ (500,000)	\$ -	\$ -	\$ (20,420,000)
MARC	MARC BWI Bus Loop Repairs	Construction of bus loop pavement and storm water facilities repairs at the BWI MARC Station.	Environmental compliance may be impacted due to not completing repairs at the storm water facilities. May necessitate a need for emergency repairs.	\$ (1,073,332)	\$ -	\$ -	\$ -	\$ -	\$ (1,073,332)
	LTR Rail and Switch Heater System Replacement			\$ -	\$ -	\$ -	\$ (600,000)	\$ (3,274,000)	\$ (3,874,000)
	LTR Group 1N - Rehabilitation of Light Rail			\$ (638,389)	\$ -	\$ (2,079,000)	\$ -	\$ -	\$ (2,717,389)
	LTR Group B2 - Rehabilitation of Light Rail		With these project canceled, MTA anticipates spending more annually on corrective maintenance, as those predicted malfunctions and failed inspections occur, over time.	\$ (456,768)	\$ (3,548,864)	\$ (4,700,000)	\$ -	\$ -	\$ (8,705,632)
	LTR Group 1S - Rehabilitation of Light Rail			\$ (327,022)	\$ -	\$ (34,230)	\$ -	\$ -	\$ (361,252)
	LTR Group 3S - Rehabilitation of Light Rail			\$ (652,262)	\$ (169,278)	\$ -	\$ -	\$ -	\$ (821,540)
	LTR Group 4S - Rehabilitation of Light Rail		Additionally, this increases the likelihood of unplanned system shutdowns, instead of the previous planned and phased shutdowns to minimize disruption.	\$ (595,883)	\$ (300,000)	\$ (590,878)	\$ -	\$ -	\$ (1,476,761)
	LTR Group 5S - Rehabilitation of Light Rail			\$ (854,574)	\$ -	\$ -	\$ -	\$ -	\$ (854,574)
	LTR Group B1 - Rehabilitation of Light Rail			\$ (336,615)	\$ -	\$ (1,880,966)	\$ -	\$ -	\$ (2,217,601)
	LTR Group B3 - Rehabilitation of Light Rail			\$ (368,598)	\$ (2,851,868)	\$ -	\$ -	\$ -	\$ (3,220,466)
	LTR Group P1 - Rehabilitation of Light Rail			\$ (368,372)	\$ (3,450,000)	\$ (311,628)	\$ -	\$ -	\$ (4,130,000)
	LTR Howard Street Rail Replacement			\$ (1,000,000)	\$ -	\$ -	\$ (16,608,884)	\$ (16,410,000)	\$ (34,018,884)
Metro	MTR Interlocking Renewal - North West Yard 7 Turnouts	Renewal of seven turnouts in the north west yard of the Metro system.	Failed interlockings could result in service disruptions. Disruptions in the yard create increased risk due to the possibility of not being able to make vehicle movements in the yard.	\$ -	\$ -	\$ -	\$ (2,694,200)	\$ (8,596,800)	\$ (11,291,000)
	MTR Station Rehabilitation & Lighting Program			\$ (2,931,658)	\$ (7,700,000)	\$ (9,000,000)	\$ (5,500,000)	\$ -	\$ (25,131,658)
	MTR Platform Rehabilitation & Snow Melt System		Currently the lack of cellular coverage can result in system shutdowns when there are radio malfunctions due to a lack of redundancy. Delays to station rehabs will result in increased corrective maintenance for the station including emergency station closures for needed repairs.	\$ (137,840)	\$ (1,500,000)	\$ (6,405,080)	\$ (6,000,000)	\$ -	\$ (14,042,920)
	MTR SCC Booth Replacement			\$ (135,550)	\$ -	\$ -	\$ -	\$ -	\$ (135,550)
	MTR Repairs at 6 Metro Stations			\$ (67,671)	\$ -	\$ (599,731)	\$ (4,197,000)	\$ -	\$ (4,864,402)
	MTR Rail and Switch Heater System Replacement			\$ -	\$ -	\$ (120,000)	\$ (300,000)	\$ (1,680,000)	\$ (2,100,000)
	MTR Cellular Coverage in Metro Tunnels			\$ (116,991)	\$ -	\$ -	\$ -	\$ -	\$ (116,991)
Metro	MTR Avtec Replacement	Design, furnish, and install a new VoIP dispatch console for the Metro	This system allows for radio communication in the Metro tunnel. If it fails, MTA will not be able to provide service in the tunnel.	\$ (3,106,000)	\$ -	\$ -	\$ -	\$ -	\$ (3,106,000)

MTA CTP Project Deferrals									
Mode	Project Name	Description	Impacts	FY25	FY26	FY27	FY28	FY29	Total 6 Year
Bus	BUS Eastern Bus Facility	Replacement of the outdated, inefficient Eastern Bus Facility with a modern facility capable of supporting Zero Emission buses.	This is the largest single investment in the now-deferred transition to ZEB. We will have to invest millions of dollars in the current Eastern facility in order to keep it operating without the replacement - that full cost is not yet known.	\$ (6,228,245)	\$ (13,046,000)	\$ (60,000,000)	\$ (72,000,000)	\$ (50,000,000)	\$ (201,274,244)
Bus	BUS Bush Building 8 HVAC Upgrades	Upgrades to the HVAC system at the Bush Bus Division.	Failure of the HVAC system could result in the need for an emergency procurement to fix the system, and could result in reductions to bus service if heat creates unsafe working conditions.	\$ (100,000)	\$ -	\$ (600,000)	\$ -	\$ -	\$ (700,000)
Bus	Zero Emission Bus Procurement BUS Zero Emission Vehicle Transition: Kirk and Northwest Retrofit BUS Fuel Cell Electric Buses and Hydrogen Infrastructure BUS Division Electrification Program Phase I	This includes the procurement of the zero emission buses and the necessary infrastructure upgrades needed to support that transition.	Delaying the transition to Zero Emission Buses violates the Maryland Zero Emission Bus Act.	\$ 9,848,116 \$ (403,789) \$ (933,625) (13,504,967)	\$ 3,177,000 \$ - \$ (175,000) (42,297,751)	\$ (7,249,000) \$ - \$ - (29,199,352)	\$ (24,750,000) \$ - \$ - (32,758,421)	\$ (67,500,000) \$ - \$ - -	\$ (86,473,884) \$ (403,789) \$ (1,108,625) \$ (117,760,491)
Agency-wide	AGY MDOT MTA Replacement of 81 Escalators, RFP AGY Elevator and Escalator Rehabilitation - RFP	MTA's escalators and elevators are not in a state of good repair and have multiple structural issues. This project is to replace the escalators and rehabilitate elevators throughout the Metro system.	MTA no longer has a plan for rehabilitating escalators; should they break beyond what can be handled via our maintenance contracts, they will be out of service indefinitely	\$ - \$ (85,605)	\$ (1,835,001) \$ -	\$ (2,816,000) \$ -	\$ (15,000,765) \$ -	\$ (15,000,000) \$ -	\$ (34,651,766) \$ (85,605)
Agency-wide	AGY RTP North/South Corridor Design AGY RTP Corridor Program Management and Development	These projects advance future planning efforts for MTA corridors, including delivering on the goals of the Regional Transit Plan.	These projects were MTA's main future-looking planning efforts in the core service area, including stopping the ongoing study of MTA's highest ridership route for additional investment.	\$ (1,634,874) \$ (322,916)	\$ (2,059,875) \$ -	\$ - \$ -	\$ - \$ -	\$ - \$ -	\$ (3,694,749) \$ (322,916)
MARC	MARC Bayview Station	Project includes design of a new MARC Bayview Infill Station in Baltimore, MD, providing commuter rail service to the adjacent Johns Hopkins Bayview campus.	Delay in this design will mean that MTA is unable to proceed with a MARC station at Bayview to connect to the Red Line.	\$ (460,236)	\$ -	\$ -	\$ -	\$ -	\$ (460,236)
Agency-wide	AGY American Legion Bridge Op Lanes Transit Study	Project includes coordination with Montgomery County to identify opportunities to leverage the American Legion Bridge for transit opportunities.	The current funding will facilitate coordination with stakeholders on future transit investments in Montgomery County.	\$ (300,000)	\$ (168,605)	\$ -	\$ -	\$ -	\$ (468,605)
Light Rail	LTR Cromwell Station Pond Repairs	Repair to parking lot and station drainage outfall structure and pond to return the storm water facility to a state of good repair.	Environmental compliance may be impacted due to not completing repairs at the storm water facilities. May necessitate a need for emergency repairs.	\$ (150,000)	\$ -	\$ -	\$ -	\$ -	\$ (150,000)

MTA CTP Project Deferrals										
Mode	Project Name	Description	Impacts	FY 25	FY 26	FY 27	FY 28	FY 29	Total 6 Year	
Agency-wide	AGY Speaker Inspection and Replacement	Inspection, rehabilitation and replacement, as needed, of the speaker system at our Light Rail and Metro stations.	Cancellation will mean more malfunctioning speakers across our system, over time, degrading the passenger experience.	\$ (757,000)	\$ (952,000)	\$ (540,000)	\$ -	\$ -	\$ (2,249,000)	
Metro	MTR TMDL Warren Road SWM Repair and Retrofit		Environmental compliance may be impacted due to not completing repairs at the storm water facilities. May necessitate a need for emergency repairs. Stormwater projects are relatively small investments that can save money over time, as unmanaged stormwater runoff can deteriorate our stations and facilities more quickly	\$ (135,416)	\$ (2,000,000)	\$ (1,313,000)	\$ -	\$ -	\$ (3,448,416)	
Bus	BUS TMDL Northwest Bus SWM Repair and Retrofit	Stormwater management system repair and retrofit at various MTA facilities.		\$ (1,966,000)	\$ -	\$ -	\$ -	\$ -	\$ (1,966,000)	
MARC	MARC TMDL Bowie State SWM Repair and Retrofit			\$ (408,114)	\$ (205,943)	\$ -	\$ -	\$ -	\$ (614,057)	
Light Rail	LTR Operator Simulator	This project would provide a training simulator for light rail operators.	Cancellation means that track time and light rail vehicles are necessary for more of the training process, with the potential of causing service reductions	\$ (1,274,223)	\$ (404,723)	\$ -	\$ -	\$ -	\$ (1,678,946)	
Metro	MTR Lexington Market Metro Facility	Improvements include: new panels at lower canopy, lighting at lower canopy, extension of glass panels at Lexington, extension of railing height on Eutaw, paint and other improvements.	The station will continue to look dated and worn next to the new Lexington Market building.	\$ (158,342)	\$ -	\$ -	\$ -	\$ -	\$ (158,342)	
Agency-wide	AGY LED Lighting Replacement	MTA will replace approximately 11,000 existing inefficient lighting fixtures, about half of the agency's total light fixtures, with LED lighting technology.	This project would result in long-term energy cost savings to the agency.	\$ (175,000)	\$ (2,855,000)	\$ (2,800,000)	\$ -	\$ -	\$ (5,830,000)	
MARC	MARC IV Railcar Mid-Life Overhaul (54 Railcars)	Overhaul of the MARC-IV railcars to allow them to reach their useful life.	The delay could cause some railcars to be pulled out of service if they do not meet FRA maintenance requirements. Increased likelihood of service impacts due to car availability.	\$ (200,000)	\$ (13,450,000)	\$ (21,000,000)	\$ (10,000,000)	\$ -	\$ (44,650,000)	
Light Rail	LTR Traction Power Substation Major Rehabilitation	Rehabilitation of the Traction Power Substations (TPSS) throughout the Light Rail system. TPSS is necessary to allow for Light Rail service to operate.	Delay of this investment could mean system shutdowns if there are any TPSS failures. MTA is currently operating with the minimum number of TPSS to provide service.	\$ (5,958,270)	\$ (5,500,000)	\$ 2,500,000	\$ 1,200,000	\$ 3,000,000	\$ (4,758,270)	
Agency-wide	AGY Southern Maryland Rapid Transit Study	Planning activities to identify and protect an alignment for future development of high-capacity transit services in the US 301/MD 5 corridor from White Plains in Charles County to the Branch Avenue Metrorail Station in Prince George's County.	Delays in congestion relief to the fastest growing region in Maryland.	\$ (5,500,000)	\$ (9,300,000)	\$ -	\$ -	\$ -	\$ (14,800,000)	
Total				\$ (50,298,049)	\$ (124,190,888)	\$ (149,228,885)	\$ (189,209,270)	\$ (159,460,800)	\$ (672,387,892)	