

Public Comments and Responses

FY 2026-2027 Unified Planning Work Program (Transportation Planning Budget)

UPWP Survey question #1: Are there parts of the budget that should get more funding? Less funding?

Public Comment: Mark W Gregory - I am a little Bias here, but Vision Zero/ Safety is basically 2% of budget. I get it, and I don't have a solution...all areas probably need twice the funding. I would like to see may more public volunteers for able so public out reach is for disabled.

BRTB Response: Thank you for your interest and comments. While safety may seem to be a small portion of the planning budget, it is part of all of the work we do for the BRTB. The safety funds support a staff member that focuses on supporting the regional and local partners in their efforts. That planner works closely with federal and state partners as well to bring resources to the region. It may not be a number in the budget, but a lot of safety work is done through partnerships. One example is the Look Alive with Signal Woman pedestrian and bicycle safety outreach campaign that is funded by the Maryland Department of Transportation Motor Vehicle Administration's Highway Safety Office. It is a program for the Baltimore region, but funded by our state partner and managed by BMC.

Other examples include: enhanced safety project scoring for the long-range transportation plan, supporting the implementation of Complete Streets Policies at the state and local levels, directly supporting the implementation of Local Strategic Highway Safety Plans in each of the member jurisdictions, encouraging and supporting proposals for federal funding (Safe Streets and Roads for All), working closely with local Pedestrian/Bicycle Coordinators, developing a hyper-local safety campaign to share messaging in focused print and digital outlets, supporting the implementation of the Safe System Approach project principles and elements in planning, and expanding public engagement for safety.

Additionally, we will work to include more outreach for disabled persons in our programs.

Public Comment: Pamela K. Shaw - If number 1 is bicycles, where is sidewalks, ADA safe intersection crossings, pedestrian deaths.

BRTB Response: Thank you for your interest and comments. Bicycle/Pedestrian and Safety planning are a key priority and following federal guidance we have a multi-modal focus, including roadways, transit facilities, as well as walking and biking.

Public Comment: Anonymous - Please expand bicycle and pedestrian planning as well as modernize the TIP process to be more inclusive of nonvehicular modes.

BRTB Response: Thank you for your interest and comments. We agree that active transportation is critical to the Baltimore region's transportation system. Active transportation planning includes human-powered means of travel like bicycling, walking, using mobility aids, and other low-powered micromobility such as electric scooters (e-scooters) and electric bicycles (e-bikes). The TIP documents federal transportation funding and many bicycle and pedestrian facilities are funded through state or local funding. So the TIP does not provide a complete picture of all funding for these facilities.

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Public Comment: Anonymous - Less funding for cycling bullies and audit all federal government funds

BRTB Response: Thank you for your interest and comments. There are good and poor drivers, good and poor cyclists and pedestrians. We strongly encourage everyone to use the transportation network in a sensible and predictable manner to get people and goods where they need to go safely.

Federal funds utilized by the Baltimore Regional Transportation Board, have and continue to undergo, an annual audit. As in the past, the most recent audit was clean and had no findings or issues cited. The BRTB works within the parameters of federal regulations to provide the region with the quality products and services.

Public Comment: Anonymous - More funding for biking and pedestrian infrastructure in built-up areas. Concerned about 30% of the budget going to consultant services.

BRTB Response: Thank you for your interest and comments. The TIP documents federal transportation funding and many bicycle and pedestrian facilities are funded through state or local funding. So the TIP does not provide a complete picture of all funding for these facilities.

Funding that is identified for consultant services varies from year to year and generally supports areas of expertise that staff are not suitably experienced to undertake. Additionally, this allows the BRTB to maintain a lean full time staff, using consultants when tasks and budget allow.

Public Comment: Robert Reuter - ADA is more than corners, you have to be able to go the entire block which is often blocked by poles, flower pots and dumped scooters etc.

BRTB Response: Thank you for your interest and comments. We support the efforts of local jurisdictions in the region as they develop and implement ADA transition plans. We agree it is critical that pedestrian infrastructure meet the requirements of the Americans with Disabilities Act standards for Accessible Design, not only to address a requirement, but to enable all individuals to comfortably and safely navigate areas designated for them.

Public Comment: Robert Reuter - Highways get far too much and public transit far too little a legacy of the Highway lobby.

too much is spent on segregating groups and far too little on maximizing group transport, Charles street in Baltimore of all the different separate transport, everybody it seems has their own private bus or van, far less expensive and useful to have one system of FULLY EASILY ACCESSIBLE vehicles running frequently for everyone but everyone wants their own private fiefdom for people they relate to.

BRTB Response: Thank you for your interest and comments. Regarding your perspective on public transit and group transport, the proposed Work Program includes funding for a task, Regional Transit Partnership Strategy, to look at opportunities for collaboration between public and private providers in the Baltimore region. Work will be completed during 2025-2026 and updates will be provided through the Baltimore Regional Transportation Board and the BMC website.

Public Comment: Henry Cook –

C1 "Title VI Planning" is funded at \$160k in FY 2026 and FY 2027. This is unchanged from the prior UPWP and thus represents an inflation-adjusted cut in funding to ensuring an equitable transportation system. Funding should be increased here.

C2 "Bike and Pedestrian Planning" does see a solid increase over 2024-2025 UPWP; however, given the goal of BRTB to "Reduce the number of crashes, injuries and fatalities experienced by all users of the transportation system" and the disproportionate number of fatalities experienced by pedestrian, this funding should be increased. One could also point to the BRTB goal to "Implement Environmentally Responsible Transportation Solutions".

C3 If necessary, reduce funding to modeling and simulation activities. The plan discusses model validation for the InSITE tool: "An InSITE validation document was produced comparing simulation and observed travel behavior and choices." - However the only publicly available validation report is dated 2017 and marked "draft". There is no documented history of validating trip generation model scenarios against observed results after a highway capacity project. Yet the modeling activities receive modest budget increases while Title VI Planning is stagnant.

BRTB Response: Thank you for your interest and comments.

R1 Much of the work to support Title VI planning efforts is integrated throughout a range of tasks. However, in view of your concern, the budget was slightly increased for this task.

R2 There is a significant number of pedestrian injuries and fatalities in the region and all programs through the BRTB have a focus in safety. It may not be reflected as a funding amount in the planning budget, but pedestrian safety is a focus of our federal, state, regional, and local partners and is addressed through those plans and programs. One example is the Look Alive with Signal Woman pedestrian and bicycle safety outreach campaign that is funded by the Maryland Department of Transportation Motor Vehicle Administration's Highway Safety Office. It is a program for the Baltimore region, but funded by our state partner managed through BMC.

R3 The BMC website has been updated to include documentation of a validation update completed last summer. Regarding support for modeling activities, a transportation plan (20 years), a Transportation Improvement Program (4 years) or individual highway/transit projects, all require valid forecasts of future demand for transportation services. These forecasts are frequently made using travel demand models, which allocate estimates of regional population, employment and land use to person-trips and vehicle-trips by travel mode, route, and time period. The outputs of travel demand models are used to estimate regional vehicle activity for use in motor vehicle emissions models for transportation conformity determinations in non-attainment and maintenance areas, and to evaluate the impacts of alternative transportation investments being considered in the transportation plan. A travel demand model is essential for an MPO the size of this region to produce the required analysis and results. In addition to being used to support BRTB activities, consultants working on individual state or local projects also use the approved regional travel demand model.

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| <p>Public Comment: Andrew Whitehead - Please consider a plan to eventually provide MARC service to/from Frederick & Baltimore.</p> <p>BRTB Response: Thank you for your interest and comments. Thank you for your comment related to MARC access. While not part of our proposed Work Program, BRTB supports the need for interregional travel through coordination with the Maryland Transit Administration (MTA), the provider of MARC service. MTA is currently preparing the MARC Growth and Transformation Plan that addresses service improvements to the Brunswick (Frederick) and Penn/Camden (Baltimore) lines including creating better connections through Washington DC.</p> |
| <p>Public Comment: Patrice Kingsley - More funding: transit centered development. Less Funding: highways</p> <p>BRTB Response: Thank you for your interest and comments. The BRTB is tasked by federal guidance to support a multi-modal system, so you will see a variety of tasks in our work program. Of note, staff at BMC is working with the Maryland Transit Administration to review proposals from consultants to create a Transit Oriented Development (TOD) Implementation Plan for the West Baltimore Red Line Station. The station is planned to become a critical regional hub with the addition of the planned Red Line Station to the existing MARC station and local bus lines.</p> |
| <p>Public Comment: Michael Shaw - More funding is needed for mass transit, protected bike lanes and pedestrian sidewalks.</p> <p>BRTB Response: Thank you for your interest and comments. There are numerous tasks to support transit, biking and walking. Having said that, more can be done and new opportunities will be considered.</p> |
| <p>Public Comment: David Sebastiao - Should prioritize public transit projects, including advocacy for the Red Line. This needs to be highlighted more thoroughly in the goals.</p> <p>BRTB Response: Thank you for your interest and comments. We appreciate that you highlighted the need to support transit projects such as the Red Line. The region's transportation goals as adopted for Resilience 2050 include support for multimodal options and implementing environmentally responsible transportation solutions such as investments in public transit. The goals of the long range transportation plan will be revised in next update that will be finalized in 2027, however we note that the goals do not name specific projects.</p> |
| <p>Public Comment: Anonymous - Fix the roads!!! Don't waste more money public transportation that never meets its revenue quotas. Stop pushing electric vehicles - when they are ready the market will take care of adoption rates.</p> <p>BRTB Response: Thank you for taking the time to consider the planning budget.</p> |
| <p>Public Comment: Anonymous - Less for public transportation and electric vehicles. More for roads!!!!!!</p> <p>BRTB Response: Thank you for your interest and comments. The BRTB supports a multi-modal transportation system and is committed to funds for preserving and operating the system before looking at expansion (as needed) for a variety of modes.</p> |

UPWP Survey question #2: Do you have any ideas for future planning activities?

Public Comment: Pamela K. Shaw - Plan for the current needs that go unmet and stop looking forward.

BRTB Response: Thank you for your interest and comment. Actually, planning is what a Metropolitan Planning Organization such as the BRTB was created to do. The BRTB is a Board in name only and does not own or operate facilities. The BRTB is the table where state and local partners sit together and plan for the best uses of federal transportation dollars. Planning ahead is critical, imagine building a house without a blueprint, it would not work. While the BRTB is charged with planning, the state and local members have ongoing maintenance and operations programs to support the system.

Public Comment: Robert Reuter - STOP planning and start building. Maryland the state that plans.

BRTB Response: Thank you for your interest and comment. Actually, planning is what a Metropolitan Planning Organization such as the BRTB was created to do. The BRTB is a Board in name only and does not own or operate facilities. The BRTB is the table where state and local partners sit together and plan for the best uses of federal transportation dollars. Planning ahead is critical, imagine building a house without a blueprint, it would not work. While the BRTB is charged with planning, the state and local members have ongoing maintenance and operations programs to support the system.

Public Comment: Michael Scepaniak

C1 The "Transportation Needs Assessment" project contained the following item: "Identification of metrics related to the list of transportation needs that the BRTB should track to assess progress in addressing the needs. This should include development of metrics specific to equity emphasis populations such as accessibility, affordability, travel times, transportation cost burden, safety, health indicators, etc.;"

C2 In the most recent LRTP, the baseline time frames for accessibility used different values for automobile and transit. The values should have been the same - 30 minutes. When challenged on this, the BRTB stated that "transit travel times are significantly higher nationwide versus highway travel times" and that "reporting metrics by differing travel times for highway versus transit is a common practice in regional transportation planning across the nation". Neither are acceptable responses.

C3 I don't believe this issue was addressed by the "Transportation Needs Assessment" project. Please address this inequitable metric as part of a planning activity.

BRTB Response: Thank you for your interest and comments.

R1 The Transportation Needs Assessment project is still ongoing, with most deliverables in development. A StoryMap is nearly complete that summarizes how the current transportation network is performing in relation to the existing LRTP goals. This StoryMap includes a map and discussion of job access by transit and auto, using a travel time of 30 minutes for each, among other data points. We anticipate publishing the StoryMap in the next few months. The StoryMap will be supplemented with a survey (closing 4/13) and focus groups (May 2025) focused on transportation needs, challenges, and investment priorities in the context of LRTP goals. These tasks will inform the

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development of the 2027 LRTP as well as identification of performance metrics the BRTB should track, as you noted. While these have not yet been determined, they are anticipated to include access to opportunity metrics.

R2 The selected travel times for accessibility for auto and transit in the previous LRTP reflect current mean travel times for these modes in the 2023 5-year ACS (28 minutes for "drive alone" and 55 minutes for public transportation). This is a common practice among MPOs and it does reflect current data. The BRTB will consider the suggested change based on the usefulness of the data reported for the Needs Assessment. Another option would be to report access for both 30 minutes and 60 minutes for both auto and transit.

R3 As stated we will consider moving both forward, although we do not consider the metric inequitable, it is in fact based on ACS data.

Public Comment: Henry Cook - Bicycle and Pedestrian Planning should be expanded to include planning for other wheeled mobility (e.g. powered wheelchair) and active transportation/micro-mobility (e.g. electric scooters). These additional modes are related and often share or use the same infrastructure and are critical transportation links for many Marylanders. Note that this expansion should include additional budget.

BRTB Response: Thank you for your interest and comments. We agree that other wheeled options are critical to the Baltimore region's transportation system. We have transitioned from bike and pedestrian planning to active transportation planning which does include human-powered means of travel like bicycling, walking, using mobility aids, and other low-powered micromobility such as electric scooters (e-scooters) and electric bicycles (e-bikes).

Public Comment: Henry Cook - To aid those reviewing UPWP budgets, please ensure documents contain not just the planned budgets, but the prior budgeted work for each element to provide the reader perspective without needing to search through the prior PDF.

BRTB Response: Thank you for your interest and comments. That is a great suggestion and one that will be included in upcoming documents.

Public Comment: Henry Cook - Within "Long Range Transportation Planning" - please provide maximum transparency and public understanding of projects under consideration for the 2027 LRTP and scoring methodology that will be applied to these projects. In the 2023 LRTP the scoring methodology was published but the projects evaluated were not provided to the public until the draft plan; instead they were presented fait accompli. The public should understand the projects proposed by jurisdictions before the draft plan is published to allow us to advocate at our local jurisdiction level for projects not included (or to have projects reprioritized).

BRTB Response: Thank you for your interest and comments. While the schedule has not been finalized, the Technical Committee and BRTB will consider a resolution regarding the project scoring methodology in fall 2025 or winter 2025/2026, this is approved prior to project submission. Regarding comments on submitted projects, we will explore methods to provide earlier public review and feedback. Meanwhile we continue to work with MDOT on the County [Priority Letter process](#) that outline local priorities.

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Public Comment: Andrew Whitehead - Can some consideration be given to creating MARC access to/from Frederick & Baltimore?

BRTB Response: Thank you for your interest and comments. Thank you for your comment related to MARC access. While not part of our proposed Work Program, BRTB supports the need for interregional travel through coordination with the Maryland Transit Administration (MTA), the provider of MARC service. MTA is currently preparing the [MARC Growth and Transformation Plan](#) that addresses service improvements to the Brunswick (Frederick) and Penn/Camden (Baltimore) lines including creating better connections through Washington DC.

Public Comment: Chris Schulze - Spend a lower percentage of your budget on consultants and partner more with non-profits and local communities to address portions of that work.

BRTB Response: Thank you for your interest and comments. Funding that is identified for consultant services varies from year to year and generally supports areas of expertise that staff are not suitably experienced to undertake. Additionally, this allows the BRTB to maintain a lean full time staff, using consultants when tasks and budget allow.

When staff does need this specialized support, a Request for Proposals is written that spells out the needed services and asks for a competitive price quote. Typically non-profit organizations or local communities do not have the expertise to handle the tasks requested, we do however invite a number of organizations and communities to participate on Advisory Committees to provide their input on a range of activities.

Public Comment: Michael Shaw - I would actually like less planning and more doing. I would rather something needs to be fixed, then nothing gets worked on.

BRTB Response: Thank you for your interest and comments. Actually, planning is what a Metropolitan Planning Organization such as the BRTB was created to do. The BRTB is a Board in name and does not own or operate facilities. The BRTB is the table where state and local partners sit together and plan for the best uses of federal transportation dollars. Planning ahead is critical, imagine building a house without a blueprint, it would not work. While the BRTB is charged with planning, the state and local members are out dealing with current needs to maintain and operate the system.

Public Comment: Anonymous - Fix the roads!!!!!!

BRTB Response: Thank you for your interest and comments. While you commented on this document, the Transportation Planning Budget, your comment really applies to the Transportation Improvement Program (TIP) which is a document that identifies specific projects, what type of work, and how much is proposed to be spent. The draft TIP, being released around May 14, will have projects proposed by the State Highway Administration, the Maryland Transit Administration and our local jurisdiction members. In last year's TIP, 37.4% of all funds went to system preservation - or fixing roads. Another 49.2% went to operating the system, so your concern is being heard and the budgets reflect a commitment to system preservation and system operations.

Letter submitted by BaltPOP - Baltimoreans for People-Oriented Places with fourteen comments

Michael Scepaniak, Co-President, Cockeysville, Baltimore County // Mark Braun MD, Federal Hill, Baltimore // Melanie Scheirer, Mount Clare, Baltimore // James Pizzurro, Towson, Baltimore County // Rob Bennett, Federal Hill, Baltimore // Phil Scherer, Elkridge, Howard County // Paul Dongarra, PMP, Baltimore County // Troy Gharibani, Timonium, Baltimore County // Ann Greenbaum, Baltimore County Jay Louis, Barclay, Baltimore

Comment 1: Vision Zero

We have long been frustrated with the role the BRTB has played in the Baltimore region's lack of progress on Vision Zero. BRTB resolution #25-19 includes the most recently updated highway safety performance targets for the Baltimore region, specifically the "Number of Non-motorized Fatalities & Serious Injuries" (Number of NMFSI). [1] Obviously, the numbers aren't good and the upward trend is awful.

As the resolution states, both the BRTB and MDOT "maintain their long-term commitment to achieve zero deaths on the state's and the region's roadways". We've gotten used to (and numb to) seeing this statement. This one-liner feels like a hollow "thoughts and prayers" statement. Absent a more substantive response, this most recent resolution feels like the continuation of an annual goalposts-moving exercise to avoid committing to adequate needle-moving measures that will reverse the upward trend of those deaths and injuries, much less get us to zero.

The current numbers are stark. The 2030 goal is to average four fatalities and serious injuries above the number from 20 years prior. That's not progress, that's standing still.

It has been stated that the executives of all of the modes in MDOT and other state leaders determined that they want realistic interim targets and goals, even though the Maryland code calls for achieving Vision Zero by 2030. [2] We don't agree with that determination. Regardless, putting that aside, what constraining factor does a decision made by state leaders impose on the BRTB? We would like to see a planning activity added to the TPB that analyzes what effort and/or steps would be required for the BRTB to set and commit to aspirational targets for the number of NMFSI in the Baltimore region.

Consider that the National Capital Region Transportation Planning Board (NCRTPB) has modified their target setting process such that they have capped their targets, including for number of NMFSI. Essentially, they've made a policy decision to no longer move the goalposts. We urge the BRTB to demonstrate a commitment similar to (if not the same as) that of the NCRTPB's.

From a citizen's perspective, there appears to be a lack of data available to drive evidence-based decision-making here. We would like to see a planning activity added to the Transportation Planning Budget that would have the BRTB and/or MDOT commission an analysis of what measures we would need to take to actually hit an aspirational target (ideally zero) for the number of NMFSI. This might be something that warrants the creation of a new committee or subcommittee of the BRTB. Regardless, we don't believe such an analysis has ever been done. Just knowing what the solution looks like (a mix of policy changes and capital investment, we imagine) would be immensely useful.

BRTB Response: Thank you for your comments and time. We agree that the number of traffic crash fatalities and serious injuries is unacceptable and recent upward trends are of concern. The BRTB does take safety seriously, yet the task you are calling for is beyond the

scope of the BRTB in areas of control and budget. We will urge organizations such as the National Highway Traffic Safety Administration, the Governors Highway Safety Association and the National Academies Transportation Research Board to partner with other organizations (with the purview of control over law enforcement, educational programs, the judiciary or human behavior generally) to take a holistic approach to identifying solutions.

There are many factors that might affect those patterns including, but not limited to, social events (e.g. COVID-19 pandemic), environmental situations (e.g. clear vs. hazardous weather conditions), and unforeseen occurrences. While unpredictable, the effects are seen in the increase in traffic deaths and serious injuries. The goal remains zero and the BRTB plans and programs to reach that goal, but some real-world changes will affect that. The BRTB tries to be responsive with programs that include: Look Alive with Signal Woman, enhanced safety project scoring for the long-range transportation plan, Complete Streets Policies at the state and local levels, the implementation of Local Strategic Highway Safety Plans in each member jurisdiction, encouraging and supporting proposals for federal funding (Safe Streets and Roads for All), working closely with local Pedestrian/Bicycle Coordinators, a hyper-local safety campaign to share messaging in focused print and digital outlets, implementation of the Safe System Approach project principles and elements in planning, and expanded public engagement for safety.

There is no constraint on the BRTB from MDOT; however, the Board chooses to be aligned with the state's Vision Zero goals and target-setting methodology to 'be on the same page and speak the same language' when regional and local partners are working with the state agencies. Please keep in mind that we are a planning agency and we work collaboratively with our state partners.

The NCRTPB covers three distinct areas (Maryland, Virginia, and District of Columbia) and combines those three sets of targets into one regional estimate. Doing so incorporates separate statistical methodologies for a single figure, which may lead to complexity. The capping of their targets is only in the case of a projected increased target; in those cases, the BRTB does not cap the target, but applies a two percent annual reduction. Doing so is more aspirational than capping at the previous year's target and strives for improvement instead of maintenance.

With the BRTB covering jurisdictions within Maryland and no other states, it makes it easier to compile data from single sources (e.g. police crash reports). Traffic safety performance measures rely on those crash data and vehicle miles traveled estimates from MDOT SHA, but there may be other data sources that would be useful. We are open to the suggested planning activity to identify data sources and develop plans and measures/targets for safety. Those would be in addition to any federally-required performance measures, which are those in the noted Resolution.

Comment 2: Alternative Levels of Service

Traffic engineers have a long-established concept of Level of Service (LOS). According to the BRTB's Glossary of Transportation Planning Acronyms and Terms, LOS is a "Report card that rates traffic flow from A (excellent) through F (failing), and compares actual or projected traffic volume with the maximum capacity of an intersection or road in question." [3] It would appear that LOS is a standard part of the BRTB's discourse.

With that established, where in that discourse are the non-automotive variants of or equivalents to LOS - Bicycle Level of Service (BLOS), Pedestrian Level of Service (PLOS), and Transit Level of Service (TLOS)? Instead of focusing only on optimizing for automobile throughput at intersections and on roadways, we'd like to see BLOS, PLOS, and TLOS studied and elevated.

Optimizing the LOS for intersections and roadways comes at the direct expense of non-automobile traffic, as that optimization frequently takes the form of people-hostile design, including slip lanes, traffic signals that won't detect cyclists, the omission of crosswalk segments, etc. The Capital District Transportation Committee (Albany's Metropolitan Planning Organization) has made BLOS a part of their discourse since 2019. [4] The same measures taken to improve LOS for automobile traffic are frequently different from the measures taken for TLOS (depending on the form that transit takes). Evaluating TLOS can inform where separated right-of-way is needed.

We would like to see a planning activity added to the Transportation Planning Budget that would analyze the feasibility of- and steps needed for institutionalizing BLOS, PLOS, and TLOS at the BRTB.

BRTB Response: The industry is changing by moving away from only considering vehicle throughput in analysis. Several years ago the BRTB commissioned a study to look at how members could better understand the impact of various land uses on a variety of modes, not simply vehicles. The BMC published, not a not Traffic Impact Report, but a [Transportation Impact Guidelines Report](#) to acknowledge all modes. This study has been used by BRTB jurisdictions to include multi-modal considerations on top of traditional LOS analysis. Additionally, MDOT Complete Streets Annual Performance Metrics include percentage of state roads that are LTS 1 or 2. MDOT used to use BLOS as a way to measure [BLOC](#).

Comment 3: Crash Analyses

As directed by the Vision Zero Implementation Act of 2022, MDOT SHA now performs an infrastructure review of any pedestrian or bicyclist fatality on a state-owned roadway. [5] Unfortunately, the early set of reviews proved to be lacking [6]. However, that doesn't diminish the promise this practice holds.

We would like to see MDOT double down on this effort, fully emulating the Crash Analysis Studio model that Strong Towns has been developing, demonstrating, and advocating for over the course of the past year or two. [7] They recently issued a report - "Beyond Blame: How Cities Can Learn from Crashes to Create Safer Streets Today." [8] The report identifies several key factors contributing to traffic accidents and highlights the lack of institutional mechanisms for making the necessary changes that could save lives.

The head of the Maryland Vision Zero Commission recently stated their desire to elevate their review and analysis practice to the level/standard set by Strong Towns and their Crash Analysis Studio. [9] We would like to see a planning activity added to the Transportation Planning Budget that helps facilitate the maturation of the SHA's infrastructure reviews and the adoption of a crash analysis practice by other regional transportation departments.

BRTB Response: Thank you for this comment, it is of interest to the BRTB. We agree that there is value in conducting a multi-disciplinary review of each fatal crash incident to better understand what occurred and to identify countermeasures to prevent another crash. We work closely with MDOT and MDOT SHA; however, the BRTB is not able to inform their processes directly. The BMC safety planner will continue to work with the review teams and support local crash review teams (there is a similar law in Howard County).

BMC also works closely with the Maryland Vision Zero Commission and the Maryland Department of Transportation Motor Vehicle Administration's Highway Safety Office (MHSO). As a planning agency, we are not responsible for the approaches taken by state agencies. This comment and recommendation will be shared with those managing the Commission and conducting the infrastructure reviews.

Comment 4: VMT Targets

In the BRTB's response to comments on LRTP Resilience 2050, the BRTB stated that "neither the BRTB nor MDOT have a stated VMT goal." [10] According to the Governor's Attainment Report Advisory Committee Summary Report of 2023, for the first time, MDOT recently set targets for Vehicle Miles Traveled (VMT) - a decrease of VMT per capita of 10% by 2030 and 20% by 2050. [11] In light of this, we urge the BRTB to follow suit and establish one or more VMT reduction targets. We imagine that this may require some planning and analysis. As such, we would like to see a planning activity added to the Transportation Planning Budget that would result in the BRTB setting such VMT reduction targets for the Baltimore region.

BRTB Response: We will review the state targets for VMT reductions and bring this topic to our committees to discuss as we move forward.

Comment 5: Long-range Transportation Planning

We're very excited about the scoring methodology for bicycle and pedestrian projects that is due to be used in the upcoming LRTP - and the process for better integrating standalone bicycle and pedestrian projects into the LRTP. Beyond that, we have several thoughts regarding the identified Long-range Transportation Planning activities slated to get started in FY 2026. Many of them extend from comments we made on LRTP Resilience 2050.

BRTB Response: Thank you for your comment. This RFP was delayed due to recent fiscal uncertainty, but we anticipate releasing it soon and hope it will be completed in time for the upcoming LRTP.

Comment 6: LRTP – Socioeconomic Forecasts

In our comment on LRTP Resilience 2050, we called on the BRTB to rework the socioeconomic forecasting section of the plan document to acknowledge that such changes are shaped and induced by the BRTB. The BRTB's response was as follows:

The socioeconomic forecasts are based upon locally adopted Comprehensive Plans and zoning regulations that are governed under the State of Maryland Land Use Article, as well as socioeconomic and development trends, market conditions and other local growth-related policies. The BRTB adopted Resolution #23-1 in June 2022 that guides the transportation investments in Resilience 2050.

The same elected officials who are responsible for the referenced "Comprehensive Plans and zoning regulations" serve on the BRTB. The members of the BRTB have control over the first elements you list as being what the forecasts are based on. Zoning and comprehensive planning play a huge role in affecting the Population, Household, and Total Employment forecasts found in the referenced Resolution #23-1. [12]

In short, there appears to be a good amount of unnecessary arrow-drawing in your response. We would like to see a planning activity added to the Transportation Planning Budget that would result in the BRTB acknowledging and explaining how any socioeconomic forecasts referenced by and included in the upcoming LRTP are shaped and induced by the BRTB. To quote our comment on LRTP Resilience 2050: *If migrants choose to embrace the “sprawling residential pattern” and if WFH increases sprawl, it will be because that is the pattern powerful governmental forces (which are in control of transportation and land use policies) have been enabling and favoring since the end of World War II. If the Baltimore region continues to age in lock step with the nation, it will be partly because housing is unaffordable to younger residents, which is largely due to land use policies that dictate exclusionary zoning and expensive accommodations for automobiles.*

Based on your response to our comment, it sounds like a dedicated planning activity needs to be funded to give the BRTB the time to introspect on how they can address what may actually be a blind spot.

BRTB Response: Thank you for your thoughtful comments regarding the socioeconomic forecasts referenced in the Long-Range Transportation Plan (LRTP). We appreciate your engagement and the opportunity to clarify how these forecasts are developed and their relationship to regional transportation planning. Your idea for a planning activity is a valuable suggestion, and we will explore potential ways to integrate such an analysis into future LRTP updates. Meanwhile, we are currently conducting a Scenario Planning process that provides insight into the relationship between growth and transportation utilizing policy levers such as increasing housing in varying locations. In addition, the BRTB recently completed a study on affordable housing and transportation.

Your comment also requests an expanded description of BRTB’s role in relation to socioeconomic forecasts included in the LRTP and to “acknowledge that such changes are shaped and induced by the BRTB.” We hope that the following information will provide a greater understanding of the BRTB’s role in these forecasts and their overall application.

The forecasts included in the LRTP are produced through the Cooperative Forecasting Group (CFG), a subcommittee of the BRTB, to develop a set of population, household, and employment control totals and small area forecasts for transportation planning purposes. The data set is utilized internally as an input to the travel demand model and for air quality conformity testing, and is available to federal, state, and local government agencies, and to the general public.

The forecasts developed by the local jurisdictions are submitted to BMC staff for review, quality control, and consistency. While BMC staff may provide comments and offer suggestions to CFG members, it is the ultimate responsibility of individual members to develop forecasts for their jurisdictions. Once any agreed upon adjustments are incorporated into the data set, the forecasts are then forwarded to the Technical Committee for their recommendation for endorsement by the BRTB, and finally to the BRTB for their endorsement as the official regional forecasts.

In your comment on LRTP Resilience 2050, your observation about the role of migration highlights the importance of availability and sustainability play in migration decisions. Recent publications have discussed how migration and housing affordability influence regional growth. These reports reveal that even though urban population decline was trending up prior to the onset of the COVID-19 pandemic, out-migration from urban cores increased considerably in 2020-2021, which as you mention in your comment was, to some degree, enabled

by remote work technologies and the immediacy of adoption brought on by the pandemic. However, the most recent estimates released by the U.S. Census Bureau indicates that metro areas, including Baltimore City and the greater region, experienced net positive population growth largely due to international migration. Factors like these are examined closely throughout the production and revision of forecasts produced by the CFG, as well as factors that impact housing choice and employment.

The attention of BaltPOP's members to these important trends is appreciated and we hope that the information included here has provided a more thorough understanding of the forecasts included in the LRTP and the overall role of the BRTB in their development.

Comment 7: LRTP – Bicycle Infrastructure Specifics

In our comment on LRTP Resilience 2050, we requested that, for roadway projects that call for bicycle accommodations, that their project descriptions commit to separated or protected facilities (where such commitment exists). The BRTB's response was as follows:

Many of these projects are envisioned to be planned, engineered and constructed 10 or 20 years from now and have not progressed through required National Environmental Policy Act (NEPA) planning efforts that will determine details on the projects. We strive to provide enough detail for public vetting, recognizing that project details are not finalized until the completion of NEPA. Projects being identified in a regional long-range transportation plan does allow for projects to progress through NEPA.

We find this response lacking. We don't consider separated vs. non-separated bicycle accommodations to be a "detail". We also understand that project details are not finalized until the completion of NEPA. We have to wonder why a roadway project included in the LRTP can specify the number of anticipated automobile travel lanes, but a bicycle infrastructure project cannot specify separated vs. non-separated or protected vs. unprotected.

Obviously, we do not have the answer to that question and it would appear that neither does the BRTB. As such, we would like to see a planning activity added to the Transportation Planning Budget that analyzes the reasons behind being able to make pre-NEPA specifications for roadway projects, but not for bicycle and active transportation projects. The planning activity should also result in recommended changes to allow for the latter going forward.

BRTB Response: We provide as much detail as available at the time of project submission. The project submittal form requests details on the type of bicycle facilities associated with each project, but this information is not always available as previously noted. The number and length of anticipated auto travel lanes is also an estimate and can change as a project moves forward in the planning and design process. It is worth noting that our air quality analysis requires us to include the anticipated number and length of auto travel lanes for roadway expansion projects due to the impact of these kinds of projects on transportation-related emissions. More accurate details on limits, length, and the type of bicycle facilities are integrated into the project description as it moves forward from the LRTP to the TIP.

We agree that it would be ideal to include specific information on the type of bicycle accommodations associated with roadway projects in the LRTP. We have not yet released the RFP for the LRTP Bicycle and Pedestrian Scoring Criteria task from the FY 2025 UPWP due to delays related to recent fiscal uncertainty.

We will incorporate this task into the peer review component of this project, including an exploration of how other MPOs detail bicycle accommodations in their LRTP and best practices for addressing discrepancies in the level of detail available for projects of varying types. This task also includes an exploration of policy questions with the BRTB, and we will include this suggestion in that discussion.

Comment 8: LRTP – Induced Demand

In our comment on LRTP Resilience 2050, we requested an explanation as to how the preferred alternative will not induce additional demand for future roadway expansions. Many other commenters called on the plan to take induced demand into consideration. The BRTB's responses to all of these comments were along the following lines:

Current regional scale travel forecasting models are able to simulate some, but not all, elements of induced demand. Our model does recognize that when a roadway is improved, speeds will increase. ... Increased travel time reliability that induces additional household trip making is not captured in travel models. ... Our modeling team continues to review national best practices and will try to include any modeling advancements that may improve our model in these areas.

We understand that the BRTB are not yet able to fully model induced demand. However, that does not mean the reality of induced demand should be completely ignored when doing transportation planning. It does not mean that the BRTB can dismiss it as a very real repercussion of the choices they make. To quote our comment on LRTP Resilience 2050:

When applied to transportation, "induced demand" refers to the idea that increasing roadway capacity encourages more people to drive, thus failing (over the long run) to reduce congestion. Given that so much of the preferred alternative is focused on roadway expansion, and that the phenomenon of induced demand is (we believe) well-known and well-proven, it seems to us that this disconnect needs to be addressed. ... Is the BRTB membership somehow of the opinion that induced demand is a discredited and meritless concept?

The pharmaceutical industry is not able to model the placebo effect, yet it fully acknowledges that it exists and factors it prominently into study results and trial designs. We would like to see a planning activity added to the Transportation Planning Budget that analyzes and outlines how the reality of induced demand, though not yet modelable, should be intrinsically incorporated into the upcoming LRTP (and all of the BRTB's transportation planning activities).

BRTB Response: Thank you for your comment. The Maryland General Assembly's 2025 legislative session had considered HB0084, an act concerning Major Highway Capacity Expansion Projects and Impact Assessments (Transportation and Climate Alignment Act of 2025). This bill would have required MDOT to perform an impact assessment of certain highway capacity expansion projects, including consideration of "induced demand impacts of major capital projects on Vehicle Miles Traveled per capita and greenhouse gas emissions." The bill notes potential tools for estimating induced demand, including the National Center for Sustainable Transportation's Induced Travel Calculator and the State Highway Induced Frequency of Travel Calculator. Although this legislation did not pass, we have begun and internal review of these suggested methodologies and will see if MDOT tests the tools to determine their usefulness.

Comment 9: LRTP - Equivalent Automobile and Transit Accessibility

In our comment on LRTP Resilience 2050, we requested that the baseline time frames for accessibility by both automobile and transit to be the same - 30 minutes. The BRTB's response was as follows:

Reporting metrics by differing travel times for highway versus transit is a common practice in regional transportation planning across the nation. ... Setting the transit bar too low may not paint an accurate picture of normal travel times. We can explore reducing the transit travel time in future updates to the long range transportation plan.

We find this response to be very frustrating. Just because a practice is common does not mean it is proper, fair, or good. Furthermore, to express concern that setting equivalent baseline time frames "may not paint an accurate picture" makes no sense to us. It's more spot-on to say that doing so will paint a very accurate (and depressing) picture - a picture that is, in fact, embarrassingly accurate.

In the BRTB's response, the BRTB indicated that they "can explore reducing the transit travel time in future updates". We don't believe this issue is (being) addressed by the Transportation Needs Assessment project. As such, we would like to see a planning activity added to the Transportation Planning Budget that addresses the inequitable automobile and transit accessibility metrics in the upcoming LRTP.

BRTB Response: Thank you for your interest and comments. As stated in an earlier response to a comment from Mr. Scepaniak individually, the Transportation Needs Assessment project is still ongoing, with most deliverables not yet complete. One product, a StoryMap, will include a map and discussion of job access by transit and auto, using a travel time of 30 minutes for each, among other data points. This task will inform the development of the 2027 LRTP as well as identification of performance metrics the BRTB should track, as you noted. While these have not yet been determined, they are anticipated to include access to opportunity metrics.

The selected travel times for accessibility for auto and transit in the previous LRTP reflect current mean travel times for these modes in the 2023 5-year ACS (28 minutes for "drive alone" and 55 minutes for public transportation). This is a common practice among MPOs and it does reflect current data. The BRTB will consider the suggested change based on the usefulness of the data reported for the Needs Assessment. Another option would be to report access for both 30 minutes and 60 minutes for both auto and transit.

Comment 10: LRTP - Public Comments on Project Submissions

Many of the comments made on LRTP Resilience 2050 called for public comment opportunities much earlier in the process, especially at the point of project submission. To quote some comments on LRTP Resilience 2050:

In the future, BRTB must operate in a more open and transparent manner during the development of the LRTP, including pre-release public comment on the projects to be included as well as local jurisdiction "policy priorities" if those are to be weighted so heavily in scoring. By keeping the actual projects, their projected costs, their projected VMT/emissions impact and their policy priority a secret until the final moment, BRTB actively hampers civic engagement in the planning process.

...

Right now, there's no open, transparent way for the public to even know what their jurisdiction is submitting for consideration until it's already happened. In the D.C. region, their MPO has started getting public feedback earlier in the process by getting comments on an initial project

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list submitted by jurisdictions. That way, jurisdictions can gauge public support for individual projects BEFORE they submit them for scoring and inclusion in the draft plan. BRTB should follow DC's lead and include an earlier public involvement period for the next long-range plan update.

...

BRTB choose (sic) to develop and publish a long and complex LRTP as final document, with no opportunity to comment on the constituent elements.

...

...rather than subject elements to individual review with appropriate comment incorporation periods, BRTB published the whole, final document with 34 calendar days to comment...

...

The public needs to be involved much earlier in the process; we don't know what projects our jurisdictions are submitting to the BRTB for consideration until it's obviously too late...

Looking at the table of FY 2026 Products/Milestones for the upcoming LRTP in the TPB, we see that the BRTB plans to hold a call for projects for the 2027 LRTP and review project submissions in the second half of 2026.

We would like to see this planning activity in the Transportation Planning Budget modified in a way such that these milestones (and schedule) are revamped to allow for the public to comment on the project submissions and for the submitting jurisdictions to meaningfully weigh those comments (such that they have time to reconsider and alter their submissions).

We understand that these project submissions are generally assumed to be the result of public comment opportunities BRTB member jurisdictions provide as part of putting together their Capital Improvement Programs (CIPs). Given the current process, it would appear that the BRTB feels that this opportunity is very sufficient. However, given the comments on LRTP Resilience 2050, it would appear that the public feels that this opportunity is woefully insufficient.

The manner in which the CIP public comment opportunities are conducted vary widely among the BRTB member jurisdictions. Consider the following instructions provided by Baltimore City:

In January, agencies present their capital budget priorities to the Planning Commission. Presentations last about an hour, including questions and answers. The Commission Chair allows for public comments if time permits. If there is no time for public comments at agency briefings, comments can be made during the Planning Commission voting session on March 13, 2025 or in writing before the voting session care of the Director of Planning (see instructions above). [13]

Contrast this with Baltimore County, which does not allow public comments at their CIP meetings. Instead, they provide a once-a-year Citizen Input Meeting (CIM) before the Planning Board, which is typically scheduled several months before their CIP meetings. This is very insufficient, because the CIM is meant to cover the entire capital budget, not just the transportation-related portion and b) it is conducted before the county reveals their proposed transportation projects.

Asserting that these comment opportunities (which are provided only at the earliest points in “the process” and not associated in any clear or explicit way with the draft LRTP) are sufficient is akin to a parent leaving a child home alone for a week without telling them - and saying it’s OK because they asked the child if they were “good” before heading out.

A robust comment opportunity must be provided when the BRTB member jurisdictions submit their projects, in such a way that those comments may be meaningfully factored into the finalized submissions. This should take the form of a draft project submission list, followed by a sufficiently long public comment opportunity, followed by a block of time that is long enough for the BRTB member jurisdictions to review those comments and make (possibly substantial) changes to their project submissions. Regardless of whether or not the member jurisdictions decide to actually heed the comments submitted, this step should exist.

It’s important to note that a number of the highway-expansion projects only made the cut in LRTP Resilience 2050 because the submitting county executive (or other submitter) awarded it a high priority score (the max is 30). Essentially, the county executives pushed through a number of projects that scored poorly (in terms of technical criteria). As such, the draft project submission list that would be published for public comment should include, at a minimum, the priority scores.

BRTB Response: Thank you for your interest and comments. Regarding comments on submitted projects, BRTB members are considering possibilities for additional public comment on the draft project list earlier in the LRTP development process. While the process hasn’t been determined since we’re in the early stages of LRTP development. We agree that the public comment period should allow for enough time for the BRTB to fully consider public comment. While the timeline for the draft LRTP is often tight due to the time required for technical scoring and evaluation of the preferred alternative, we will evaluate the schedule and build in as much time as possible for public comment and review.

Comment 11: LRTP - Meaningfully Incorporating Public Feedback

As part of the BRTB’s 2024 Federal Certification Review, we submitted a public comment which spoke to the BRTB’s continuing failure to meaningfully incorporate public feedback into the finalized versions of the draft plans on which the public is commenting. LRTP Resilience 2050 is the prime example of this.

It’s our understanding that no substantive changes were made to the LRTP Resilience 2050 document after all of the public comments were received (aside from adding an appendix). As such, we don’t see how anyone can say/feel that their “input helped shape the final plan”. To quote some comments on LRTP Resilience 2050:

We took time to provide input, and technically every comment was replied to, but all replies were in defense of the plan as written, as if BRTB replies are regularly written with a conclusion already in mind: that there is no need to modify plans based on public input. The words thanking us for participating ring hollow when our input, such as overwhelmingly advising a drawdown of highway widening, results in no material change to the plan. It is essential to solicit public input only when it is truly wanted, otherwise agencies risk losing the public’s trust.

...

...with a short comment period followed by a very short revision period the LRTP was rubber-stamped the board (sic). Members of BRTB justified rushing through approval despite actionable and specific comments by indicating that it was too late in the process...

...

...BRTB published the whole, final document with 34 calendar days to comment and then approved a substantially un-altered LRTP on the justification of expediency.

...

...I think it is clear that BRTB did not incorporate feedback and does not value the time people such as myself spent reviewing the long and complex documents.

...

I understand it can take a while to turn a big ship, but pushing forward with a plan so deleterious to Baltimore despite significant public objection simply because you want the plan done and don't want to wait any longer to get it out is nothing short of irresponsible.

...

...when we speak out overwhelmingly for or against the types of projects we want to see, we're effectively told our feedback can't be folded into the plan and instead are offered unaccountable promises that BRTB and its member jurisdictions will strive to do better next time. This is not acceptable.

By the time the draft plan is released for public comment, it seems that it's already too late. Member jurisdictions have already chosen what projects they want to submit, scoring has happened, and there is zero appetite from members to re-visit (sic) those decisions so late in the process.

By all indications, the process used by the BRTB is not built for meaningfully incorporating public input into whatever plan is currently up for comment. At best, it is built to allow some influence over the next plan.

At the July 2023 meeting where LRTP Resilience 2050 was adopted by the BRTB, several members of the public urged the BRTB to vote against adopting it. Consider the comments made by board members during their vote to adopt [14]:

But, you know, this is a big plan. I think the comments this time are not in vain. They help set us up for continued discussions...

...

I know this is a long range plan. I know this is supposed to be the bellwether and the benchmark. But these things take time to change...

...

There is a lot of time that it takes to develop everything from ped projects, complete streets, transit projects. It takes time

The implicit messaging being sent to the public was that their comments had no hope of actually being meaningfully incorporated into the plan on which they were commenting. This is very much in contrast to the explicit messaging sent by the BRTB when soliciting the public for their comments.

We all understand that the actual building takes a long time. But, the plan for all of that building takes much less. The creation of the plan, itself, can and should be more iterative.

Looking at the table of Anticipated FY 2027 Products/Milestones for the upcoming LRTP in the TPB, we see that the BRTB plans for a public review and comment period in the second half of 2027. Those comments are to then be given “consideration... during preparation of the final plan”.

We would like to see this planning activity in the Transportation Planning Budget modified in such a way that these milestones (and schedule) are revamped to allow for the BRTB to meaningfully incorporate the public comments received. This should manifest as a block of time that is long enough for the BRTB member jurisdictions to review those comments and make (possibly substantial) changes to the draft LRTP before it is finalized. Regardless of whether or not the member jurisdictions decide to actually heed the comments submitted, this block of time should exist.

BRTB Response: Thank you for your interest and comments. We agree that the public comment period should allow for enough time for the BRTB to fully consider public comment. While the timeline for the draft LRTP is often tight due to the time required for technical scoring and evaluation of the preferred alternative, we will evaluate the schedule and build in as much time as possible for public comment and review.

Comment 12: LRTP - No Mobility Points for Highway Expansions

In response to our comment on LRTP Resilience 2050, the BRTB released an Appendix B that provides a breakdown for each project score. This was very appreciated. Looking through it, a number of the highway-expansion projects earned points for "Mobility". The project scoring whitepaper includes the following to define mobility:

Projects on highways that cause more hours of delay (more congested) will be prioritized over projects on highways that cause less hours of delay (less congested), and thus will receive more points. This incentivizes the implementation of projects anticipated to improve congestion on roadways that are the most congested. [15]

Given induced demand (which we covered earlier in this comment), we don't see how many/any highway projects cause less hours of delay (beyond the first few months or years beyond completion of the project).

We would like to see a planning activity added to the Transportation Planning Budget that would result in the project scoring criteria to be modified such that highway expansion projects aren't eligible for any points for mobility (the current max is 10).

BRTB Response: Thank you for your interest and comments. We will review the mobility scoring criteria for highway projects in the next plan process and as we have done previously anticipate that the new scoring process will be adopted by a formal resolution of the BRTB. While the schedule has not been finalized, the Technical Committee and BRTB will consider a resolution regarding the project scoring methodology for the 2027 LRTP in fall 2025 or winter 2025/2026.

Comment 13: LRTP - Project Scoring Points Adjustments

It could be argued that one of the weaknesses of the BRTB, as currently constituted, is that voting power is not commensurate with population. Queen Anne's has the same voting power as Baltimore County, despite their large differences in population. One way to counterbalance this a bit would be to award extra points to those projects submitted by higher-population jurisdictions.

This imbalance is further exacerbated by the fact that projects are subject to receiving a 10 point bump if they have received a commitment of financial support from MDOT. Reducing the possible points for this criterion should be considered, so that MDOT ceases to hold so much sway and dilutive power over the LRTP.

We would like to see a planning activity added to the Transportation Planning Budget that would possibly result in the project scoring points being adjusted to account for population differences and lessen MDOT's influence.

BRTB Response: Perhaps your group considers the current voting power as a weakness, however the BRTB members have discuss the issue of member votes several times and together have agreed that forming consensus is more important. We have seen that jurisdictions with larger populations do tend to submit more projects, and conversely, jurisdictions with smaller populations submit fewer projects.

The value of the 10 point bump from MDOT for any project increases the likelihood that it will move forward in the process, and therefore that the LRTP is not a wish list of projects.

BaltPOP also included a closing summary and footnotes. Please see the full letter in the UPWP Appendix in Public Involvement for those items.