

Baltimore Regional Transportation Board  
1500 Whetstone Way  
Suite 300  
Baltimore, MD 21230

July 9, 2021

RE: Draft 2022-2025 Transportation Improvement Program

Dear Members of the Baltimore Regional Transportation Board,

Thank you for the opportunity to provide input on the Draft 2022-2025 Transportation Improvement Program (TIP) for the Baltimore region. The TIP can be simply described as the list of regional transportation projects using federal funds over the next four years. However, we believe it is important to look at this document not simply as a collection of individual projects, but as a program that reflects our region's transportation priorities.

Many of the undersigned organizations submitted comments for last year's TIP (2021-2024) expressing dismay at what that program's planned spending revealed about our region's priorities. At the time we wrote:

*“Unfortunately, this Draft TIP does not prioritize spending in a way that will do anything but worsen the interwoven crises facing our state and our world. The COVID-19 pandemic is an acute crisis that has highlighted how black people and other communities of color have been disproportionately impacted by poor air quality. Meanwhile, the climate crisis continues to mount with the transportation sector as the number one source of greenhouse gas emissions. And the racial and economic disparities underlying it all are, in part, due to decades of transportation and land use decisions designed to exclude and segregate black people.”*

Those realities have not fundamentally changed in the last year. Despite some improvements in spending by category, the 2022-2025 TIP is still heavily tilted towards spending on fossil fuel infrastructure that exacerbates more problems than it purports to solve. In the previous TIP we noted that the \$1.3 billion for highway capacity was 650 times the \$2 million programmed for transit capacity. In this year's TIP, there are zero dollars for transit capacity. So despite a reduction in the highway capacity category (still almost a billion dollars), mathematically speaking, the region is now spending infinitely more on new highways than it is on new transit. The consequence of spending priorities like these is ever more driving. No wonder Maryland was setting new highs for vehicle miles traveled per capita shortly before the pandemic.

As discussed in last year's comment letter (attached for reference) these spending priorities are ineffective, inequitable, unhealthy, and environmentally unsustainable. However, we highlighted

that many members of the BRTB have expressed a desire to change course toward a cleaner, more balanced transportation future for the region. In that letter we proposed a baby step in the right direction would be to not add any new highway capacity projects to the proposed TIP that were not already in previous TIPs. Although the Board declined to do so last year, we are pleased to see that Draft 2022-2025 TIP does not include any new highway capacity projects being introduced. The region is in a deep transportation hole and putting down the shovel on more highways is the first step in getting out of it.

To build on this step, it will be critical to ensure that this year is not an anomaly and we continue to avoid introducing new highway capacity projects to the TIP. To illustrate why, we can look back to the highway capacity projects that were newly added to last year's TIP. Four of the five projects are still in the program and one is listed as "between funding stages". Although they represent relatively small dollar amounts now, as the projects work their way through the design and construction process the full construction costs will be tens of millions of dollars in future TIPS.

Last year we proposed that funds should be re-directed to three areas: (1) the Maryland Transit Administration's (MTA) backlog of deferred maintenance as documented in the 2019 Capital Needs Inventory (CNI), (2) ADA compliance near transit stops and stations, and (3) completing bike trails such as the Baltimore Greenway Trails Network, the Baltimore Separated Lane Network, Anne Arundel County South Shore Trail and the North Point Trail. Comparing those requests to the Draft 2022-2025 TIP we find:

1. The CNI is not directly referenced in the TIP so it is difficult to verify whether funding to address those specific needs has increased. However, we are encouraged to see that this year's TIP has the highest amount, both in real dollars and as a percentage of the budget, programmed for Transit Preservation since the 2020 TIP (when Transit Preservation was first broken out as its own category).
2. ADA is referenced many times in many projects throughout the TIP, but since it is not its own discrete category it is difficult to know whether funding has increased. However, a recent lawsuit against Baltimore City regarding its ongoing lack of ADA compliance suggests that this is an area where the region should be directing more resources.
3. Similar to ADA, bicycle facilities are often spread throughout many projects and it's difficult to track overall regional spending levels on bicycle facilities. We're glad to see a portion of the Greenway Trails Network included in this program. Other opportunities like connecting the Torrey C. Brown Trail to the Jones Falls Trail, and connecting the Middle Branch Trail to the BWI and Baltimore and Annapolis Trail would improve city to county connections and would make the region's trail network truly regional. We do not see evidence that other trails or separated bike facilities are being prioritized.

Finally, since the previous TIP was adopted, the region approved MTA's Central Maryland Regional Transit Plan (RTP). The plan presented a vision for improving and expanding transit in the region over the next 25 years. We are pleased to see a new project added to this year's TIP, "East-West Bus Corridor", which corresponds with an Early Opportunity transit corridor identified in the RTP. However, that is the only project that mentions the RTP. The Plan will only be useful and improve outcomes for riders if it is being implemented and evidence of that will be when elements start to get into the TIP. We encourage the Board to work proactively to introduce into the TIP more RTP elements, such as corridor studies, transit hubs, and ADA compliance.

The transportation status quo continues to hold this region back from reaching its full potential, economically, socially, and environmentally. It is up to the leaders of this region to decide whether we spend that money in ways that reinforce the status quo or in ways that repair the damage caused by decades of racism, disability discrimination, pollution, and inequity. We are encouraged that the Board has taken a small step in the right direction by turning the dial down on highway capacity projects and toward preservation of our existing system. We hope that this signals a lasting change in direction for the region and we encourage our regional leaders to take bolder steps moving forward.

Sincerely,

1199 SEIU United Healthcare Workers East	Downtown Residents Advocacy Network
Baltimore Co. Progressive Democrats Club	Fund for Educational Excellence
Baltimore MARC Riders	Klaus Philipsen, FAIA, ArchPlan Inc.
Baltimore Transit Equity Coalition	Maryland Consumer Rights Coalition
Bikemore	Maryland Sierra Club
Central Maryland Transportation Alliance	Our Revolution Baltimore City/County
Coalition for Smarter Growth	Rails-to-Trails Conservancy
Consumers for Accessible Ride Services	Union of Concerned Scientists
Disability Rights Maryland	

Attachment A - Copy of comment letter for Draft 2021-2024 TIP

Baltimore Regional Transportation Board  
1500 Whetstone Way  
Suite 300  
Baltimore, MD 21230

July 23, 2020

RE: Draft 2021-2024 Transportation Improvement Program

Dear Members of the Baltimore Regional Transportation Board,

Thank you for the opportunity to provide input on the Draft 2021-2024 Transportation Improvement Program (TIP) for the Baltimore region. The TIP can be simply described as the list of regional transportation projects using federal funds over the next four years. However, we believe it is important to look at this document not simply as a collection of individual projects, but as a program that reflects our region's transportation priorities.

Unfortunately, this Draft TIP does not prioritize spending in a way that will do anything but worsen the interwoven crises facing our state and our world. The COVID-19 pandemic is an acute crisis that has highlighted how black people and other communities of color have been disproportionately impacted by poor air quality<sup>[1]</sup>. Meanwhile, the climate crisis continues to mount with the transportation sector as the number one source of greenhouse gas emissions<sup>[2]</sup>. And the racial and economic disparities underlying it all are, in part, due to decades of transportation and land use decisions designed to exclude and segregate black people<sup>[3]</sup>.

And yet, over the next four years, the Baltimore region plans to spend a whopping \$1.3 billion on widening highways and a miserly \$2 million on new transit. That's 650 times more on new fossil fuel infrastructure that exacerbates more problems than it purports to solve. It continues a five-year trend of spending more on new highway capacity.

As discussed below, the spending priorities in the Draft TIP are ineffective, inequitable, unhealthy, and environmentally unsustainable. Moreover, the spending levels and mix of

projects do not represent the policy positions and ideals that many BRTB members espouse.

### **Ineffective**

The single largest category of spending in the Draft TIP is for highway capacity projects that are supposed to “fix congestion”. In fact, widening highways has a poor track record for relieving traffic congestion. For decades, study after study has found that expanding road capacity does not relieve congestion for very long because people will drive more and soak up that capacity.

The most recent study to come to this conclusion was released just last year and found that a 1 percent increase in lane-miles induced a 1 percent increase in vehicle-miles traveled (VMT). Moreover, after just five years, the short-term increases in speed are wiped out and congestion returns to pre-project levels<sup>[4]</sup>.

According to a Transportation Alliance analysis<sup>[5]</sup> of the Texas Transportation Institute’s Urban Mobility Report, between 1982 and 2011, the Baltimore region nearly doubled its amount of freeway lane miles (from 885 lane miles to 1,561 lane miles). During that same time, the region’s population grew from 1.7 million to 2.5 million – a 48% increase.

Freeway expansion far outpaced population growth, but it did not relieve traffic congestion. In fact, by every measure congestion got worse. The amount of congested lane miles increased from 31% to 58%. The annual hours of delay per auto commuter quadrupled--from nine hours a year to 41 hours a year. And the annual cost of congestion increased from \$96 million per year to \$1.5 billion per year. According to data from the American Community Survey, the average commute time in Maryland continues to increase each year.

Growth in highway lane miles significantly outpaced population growth and yet, congestion got worse, not better. Why? Because more lane miles, and the accompanying auto-dependent suburban and exurban development that results, just meant people were forced to drive more. And we haven’t provided many other transportation choices for residents. In the Baltimore region, we haven’t built any new high-quality, rapid transit since the Light Rail opened a generation ago.

### **Inequitable**

Investments in transportation do not impact all populations equally. The proposed 21-24 TIP’s lopsided investments in widening highways are aimed at improving mobility for higher income people and those with private automobiles. Additionally, it will further

entrench structural inequities that disadvantage some populations over others. For example, as mentioned above, a 2019 study<sup>[6]</sup> found that in the U.S. air pollution is disproportionately caused by white Americans' consumption of goods and services, but disproportionately inhaled by black and Hispanic Americans.

In addition to public health inequities, this Draft TIP will further entrench economic inequities. In neighborhoods that are historically disinvested and economically distressed, more than a third of households have no access to a vehicle and these households are cut off from economic opportunity by a transportation system so heavily tilted towards the automobile. According to studies from the University of Minnesota's Accessibility Observatory, a resident of the Baltimore region can get to any job in the region in less than an hour by automobile. 100% of jobs are accessible. However, that resident would only be able to reach about 11% of the region's jobs in less than an hour by transit.

The investments proposed in this TIP will exacerbate the patterns that have left neighborhoods cut off from economic opportunity, suffering high unemployment, entrenched poverty, and disinvestment.

## **Unhealthy**

Dr. Gaurab Basu, from the Center for Health Equity Education & Advocacy at Cambridge Health Alliance and the Department of Global Health & Social Medicine at Harvard Medical School, recently wrote: “[o]ne of the best prescriptions I could write for my patients is a clean, equitable, and sustainable transportation system. Transforming our dirty transportation system has long been an urgent public health issue. Air pollution has always made us sick; it increases the risk of heart attacks, childhood asthma exacerbations, strokes, and premature death. But COVID-19 puts an even greater impetus on us to end the use of internal combustion engines and fossil fuels.”

He went on to cite a recent Union of Concerned Scientists study<sup>[7]</sup> which found that “communities of color breathe in, on average, 66 percent more PM<sub>2.5</sub> air pollution from vehicles than white residents in the Northeast and mid-Atlantic region.” It also found that Maryland's median PM<sub>2.5</sub> concentration from on-road vehicles exceeds the regional average. A separate Harvard study has found that increased exposure to PM<sub>2.5</sub> puts individuals at greater risk of dying from COVID-19<sup>[8]</sup>.

## **Environmentally unsustainable**

Widening highways while shortchanging investment in public transportation does not meet the challenge of climate change. Last year, Marylanders drove more miles per capita than ever before, the result of adding more capacity to the public roadway network than to

alternatives like buses, trains and biking. As one transportation policy expert puts it, “ceasing the continuing expansion of the highway and roads network is essential to any effort to reduce the carbon footprint of transportation which is now the single largest contributor to America’s greenhouse gas emissions”<sup>[9]</sup>

In October 2018 the Intergovernmental Panel on Climate Change published a 700-page report on the impacts of global warming and what it would take to reduce greenhouse gas emissions to limit warming to 1.5 degrees Celsius. To achieve this, the report states that global CO<sub>2</sub> emissions must decline by about 45% from 2010 levels by 2030 and reach net zero around 2050. This means we have just 10 years to drastically cut emissions if we are to mitigate the rising sea levels, droughts, and storms that result from global warming. Reducing emissions from the transportation sector will be critical to this effort and those reductions will not happen if we continue to widen highways and increase our dependence on cars.

Adding more lanes of highway will have other significant environmental consequences. Additional lane miles add impermeable surface that will increase stormwater runoff into streams, rivers, and the Chesapeake Bay. Additional lane miles and additional capacity for cars will result in increased tailpipe emissions, currently the largest source of air pollution in Maryland. Additional lane miles will encourage auto-dependent residential and business development that will result in conversion of more farmland and natural lands to land covered with asphalt and buildings.

### **Change is possible**

The BRTB has an opportunity to change course away from these outcomes and toward a cleaner, more equitable transportation future. Many members have already expressed a desire to do so.

County Executive Olszewski has stated priorities for “building robust public transportation and infrastructure” and “promoting smarter development.”<sup>[10]</sup>

County Executive Ball wants to “increase accessibility through a truly multi-modal transportation system” and to alleviate traffic and protect our environment “by reducing the number of cars on our roads.”<sup>[11]</sup>

County Executive Pittman recognizes the importance of the Central Maryland Regional Transit Plan and promises to “be at the forefront of transportation planning that focuses on moving people rather than cars.”<sup>[12]</sup>

Mayor Buckley has said, “The future is not cars. The future is how we’re going to get around on electric scooters and bikes and things like that have less impact on the planet.”<sup>[13]</sup>

These statements represent a commitment to a cleaner, more balanced transportation future for the region. But unless you put real resources behind these sentiments, it won’t happen.

There’s an old saying that when you’re in a hole that you want to get out of, the first thing you have to do is stop digging. Well, we are in a deep transportation hole. A transit system that breaks down more often than just about every transit system in the country<sup>[14]</sup>. Rising commute times. Disconnected communities. Chronic poor air quality. We have to stop digging, and the way we propose to do this is to stop relentlessly adding new highway capacity projects to the TIP.

We understand that the vast majority of the highway capacity spending is on two projects already underway (the I-95 Express Toll Lane Extensions and I-695 widening), and that it may be impractical to cancel these projects. However, there are five highway capacity projects that are new to the 21-24 TIP (see Table II-2: New Projects in the 2021-2024 TIP). For some of these projects, the TIP funding only covers early design costs and full construction will cost tens of millions more in upcoming TIPs. Once a project gets into a program like this, it is harder to divert the money to other uses. We shouldn’t be starving the project pipeline for transit while adding project after project to the highway pipeline.

The new highway capacity projects only total about \$45 million. Canceling them would bring the highway capacity budget from 30.68% of the TIP budget to 29.62%. Canceling these projects is not some radical change – it’s a drop in the bucket. It’s simply putting down the shovel so the hole doesn’t get any deeper. But it is the necessary first step.

We respectfully request that you remove the five new highway capacity projects from the 21-24 TIP and redirect those funds toward projects that help to build the region many of you say you want. The funds could go to any number of worthy projects, such as:

- Addressing the \$1.5 billion backlog of deferred maintenance identified in MTA’s Capital Needs Inventory<sup>[15]</sup>
- Making sidewalks near bus stops and train stations compliant with the Americans with Disabilities Act



- Completing bike trails like the Baltimore Greenway Trails Network, the Baltimore Separated Lane Network, the Anne Arundel South Shore Trail, and the North Point Trail

2020 is a pivotal year in the United States. It is becoming more clear than ever that we cannot accept the status quo in so many areas, including health care, criminal justice, the environment, and the economy. Transportation has to be a part of that change, too. The Draft 21-24 TIP proposes to spend over \$4 billion of taxpayer money. It is up to the leaders of this region to decide whether we spend that money in ways that repair the damage caused by decades of racism, pollution, and inequity, or in ways that just keep digging a deeper hole.

Sincerely,

Baltimore Commission on Sustainability

Colin Beckman, Baltimore Penn Station MARC Riders Group

Liz Cornish, Bikemore

Charlie Goedeke, HoCo Climate Action

Samuel Jordan, Baltimore Transit Equity Coalition

Paul Kowzan, BRTB PAC Member-Baltimore City Resident

Brian O'Malley, Central Maryland Transportation Alliance

Cecilia Plante, Maryland Legislative Coalition

Emily Ransom, Clean Water Action

Jimmy Rouse, Transit Choices

Stewart Schwartz, Coalition for Smarter Growth

Josh Tulkin, Maryland Sierra Club

CC: Mike Kelly, BMC

Todd Lang, BMC

Regina Aris, BMC

Zach Kauffman, BMC

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- [1] Christopher W. Tessum, et al, "Inequity in consumption of goods and services adds to racial-ethnic disparities in air pollution exposure," Proceedings of the National Academy of Sciences March 2019, 116 <https://www.pnas.org/content/116/13/6001>
- [2] U.S. Energy Information Administration <https://www.eia.gov/totalenergy/data/monthly/pdf/mer.pdf>
- [3] Ashish Valentine, "'The Wrong Complexion For Protection.' How Race Shaped America's Roadways And Cities", NPR, July 5, 2020 <https://www.npr.org/2020/07/05/887386869/how-transportation-racism-shaped-america>
- [4] Kent Hymel, "If you build it, they will drive: Measuring induced demand for vehicle travel in urban areas," *Transport Policy* Vol. 76 (April 2019): 57-66 <https://www.sciencedirect.com/science/article/abs/pii/S0967070X18301720>
- [5] <https://www.marylandmatters.org/2019/09/04/opinion-more-roads-mean-more-congestion/>
- [6] Tessum, et al, "Inequity in consumption of goods and services adds to racial-ethnic disparities in air pollution exposure"
- [7] Union of Concerned Scientists, "Inequitable Exposure to Air Pollution from Vehicles in the Northeast and Mid-Atlantic", <https://www.ucsusa.org/sites/default/files/attach/2019/06/Inequitable-Exposure-to-Vehicle-Pollution-Northeast-Mid-Atlantic-Region.pdf>
- [8] Xiao Wu, et al, "Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study" <https://projects.iq.harvard.edu/covid-pm/home>
- [9] Yonah Freemark, "Too little, too late? A decade of transit investment in the U.S.", TransportPolitic.com, <https://www.thetransportpolitic.com/2020/01/07/too-little-too-late-a-decade-of-transit-investment-in-the-u-s/>
- [10] <https://www.baltimorecountymd.gov/Agencies/executive/priorities.html>
- [11] <https://www.howardcountymd.gov/Branches/County-Executive/Reliable-and-Accessible-Infrastructure>

[12]

<https://www.capitalgazette.com/opinion/columns/ac-ce-column-steuart-pittman-20200218-ef3dhgfokvde5aapeaajcdd3ki-story.html>

[13]

<https://www.baltimoresun.com/maryland/anne-arundel/annapolis/ac-cn-annapolis-bike-ride-20200702-20200702-bu4kshp4avfwvjgxvh6u57uliu-story.html>

[14]

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[15]

[https://s3.amazonaws.com/mta-website-staging/mta-website-staging/files/Transit%20Projects/Capital/201907\\_MDOTMTA\\_CNI.pdf](https://s3.amazonaws.com/mta-website-staging/mta-website-staging/files/Transit%20Projects/Capital/201907_MDOTMTA_CNI.pdf)