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Transportation Alliance

Mr. Paul Comfort
Administrator, Maryland Transit Administration
6 Saint Paul Street
Baltimore, MD 21202

January 11, 2016

Dear Administrator Comfort:

Thank you for the opportunity to comment on the BaltimoreLink plan. Everyone in Central Maryland should be glad that our transit administration is giving a much-needed update to the bus system we pay daily to operate. Likewise everyone should provide input and hold the Maryland Transit Administration (MTA) accountable for doing the update in a way that delivers the economic, environmental and social benefits we expect from our investment in public transportation.

The Central Maryland Transportation Alliance has been a longtime proponent for a comprehensive overhaul and update of MTA's bus network. The Transportation Alliance staff participated in the MTA's Bus Network Improvement Project (BNIP) throughout 2012 and 2013. We supported implementation of BNIP's initial phases and advocated for the release of the full plan.

However, we have never viewed the bus network as the only solution for regional transportation issues. Bus routes are most effective in conjunction with a true regional network of high-capacity, separated-from-traffic, rapid transit lines, such as was proposed in the 2002 Baltimore Regional Rail System Plan. BaltimoreLink is not a substitute for such a network or for any components of the network, like the Red Line or high frequency service along the northeast corridor between BWI and Bayview. We feel compelled to make that clear because the current Administration and MDOT/MTA leadership portray BaltimoreLink as "transformative" and refer to Baltimore as a "bus town". This seems to imply that a bus network overhaul is all that is needed. We disagree. We believe that regional mobility needs to be improved through building out a regional rapid transit network, expanding service on commuter rail (MARC), increasing bicycle infrastructure, and building streets that work for all modes of travel.

That said, we do want a vastly improved bus system and we see BaltimoreLink as the most immediate opportunity to make significant changes. At the outset it is critical for MDOT/MTA to determine what will define “success” for BaltimoreLink. There are objective and measurable ways to determine whether BaltimoreLink will make the bus system better overall. We believe that those metrics should include: access to jobs by transit, access to schools by transit, mode split, and reliability. Except for school access, each of these metrics was included in the Transportation Alliance’s 2015 Transportation Report Card. Traditional transit metrics, such as farebox recovery or vehicle revenue miles, focus on service effectiveness from the provider’s viewpoint. But the metrics from our Report Card look at transportation and transit services from the perspective of workers, families and employers who rely on the system. We believe that these user-focused metrics should provide the basis for evaluating BaltimoreLink and we urge MDOT/MTA to answer the following questions:

- By how much will BaltimoreLink increase the percentage of our region’s jobs that a typical resident can get to in 60 minutes or less using public transportation?
- How will BaltimoreLink improve access to educational opportunities? How will it decrease commute times for Baltimore City Public School students?
- By how much will BaltimoreLink decrease the percentage of regional commuters who get to work via single occupancy vehicle?
- How will BaltimoreLink improve on-time performance and maintain headways as scheduled?
- By how much will BaltimoreLink reduce the percentage of the population that travels more than 45 minutes to work, particularly in neighborhoods such as Poppleton and Sandtown/Winchester where more than a third of workers do so? Or will it exacerbate this key indicator of neighborhood distress?

Publicly, MDOT/MTA has not attempted to answer these questions and has not shared travel modeling of the BaltimoreLink system. This makes it very difficult to provide input during this initial public comment period. The Transportation Alliance cannot support BaltimoreLink if MDOT/MTA can’t answer these questions and demonstrate that BaltimoreLink will improve conditions for commuters, families and employers in a measurable way. However, we have appreciated open communications with MTA staff throughout this initial public comment period and we hope to continue a dialogue about incorporating our suggested metrics and answering key questions about the new system’s performance. It is crucial to develop standards by which we can measure the effectiveness of the new system and continue to monitor bus network performance on an on-going basis.

Based on the current proposal and the information that has been released thus far we offer the following as what we see as the strengths and weaknesses of the plan. We reference recommendations from recent reports issued by the Transportation Alliance.

If you have any questions or concerns, please feel free to contact Brian O’Malley, President & CEO of the Central Maryland Transportation Alliance, at bomalley@cmtalliance.org or 410-332-4172.

Thank you very much for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian O'Malley". The signature is fluid and cursive, with a large loop at the end of the last name.

Brian O'Malley
President & CEO

CC: Kevin Quinn, MTA

Strengths of BaltimoreLink	Recommended in the following Transportation Alliance report(s)
Expands the span of service of the Central Light Rail on Sundays from 8 hours to 18 hours	The Last Mile
Expands the availability of the bicycle car on the MARC Penn Line weekend service	Let's Get to Work, The Last Mile
Adds Regional Transit Administration bus service between the MARC Penn Line's Odenton Station and the MARC Camden Line's Savage Station via Ft. Meade	The Last Mile
Improves multi-modal access to and from rail and bus hubs through facilitating a car-sharing service, installing bicycle storage, and funding bicycle sharing stations, particularly in Baltimore City	Let's Get to Work
Replaces the MTA 17 with a new route (BaltimoreLink Route 75) that travels a more efficient route between Patapsco Light Rail Station and Arundel Mills and follows the employer-heavy New Ridge Road instead of Aviation Blvd.	The Last Mile
Adds reverse commute service on commuter bus routes including between Baltimore City and Aberdeen / Havre de Grace	Your Ride to Work Harford County
Adds or improves travel options along highly traveled suburb-to-suburb routes such as between White Marsh and Towson or Owings Mills and BWI	The Last Mile
Spreads bus services into a grid in an attempt of avoiding service duplication and corridor congestion in current corridors with multiple lines competing for curb space	-

Weaknesses of BaltimoreLink	Recommended in the following Transportation Alliance report(s)
Does not show whether access to schools, access to jobs, reliability, transit mode share or other factors important to the public will improve	
Does not show whether average commute times, particularly in neighborhoods where long commutes are tied to unemployment and poverty, will decrease	
<p>Uses jobs near bus routes to describe job access without taking into account:</p> <ul style="list-style-type: none"> • whether a bus runs every ten minutes or only twice day • how long it takes people to get to the bus stop that's 	

near their job	
Limits the Transit Hub concept to bus operations, when it really should be about creating a hub that facilitates transferring between modes and that attracts real estate development	
Relies on Transit Hubs for the operations to work without having control over the sites needed or a process for involving affected communities	
Does not target resources to improve bicycle infrastructure between transit hubs and employment centers	Let's Get to Work, The Last Mile
Increases the need to transfer while requiring riders to pay a new fare each time they do so	
Increases the need to transfer while not reducing the perceived time cost to do so through improved reliability, accurate real-time arrival information, countdown clocks, and bus stop amenities	
Does not include construction funding to implement Transitways that would separate buses from traffic.	
Does not provide frequent circulation between transit hubs and nearby employment such as near Owings Mills Metro or BWI Business District Light Rail.	Let's Get to Work, The Last Mile
Lacks budget transparency – no itemized breakdown by fiscal year showing and discretely identifying operating from capital costs	
Eliminates bus service between downtown Baltimore and the BWI Business District and Arundel Mills between 2am and 5am – a critical commute time for the transportation and hospitality employers clustered in that corridor	
Does not meet the growing demand for MARC Commuter Rail service by implementing more service after 6pm or other improvements in the MARC Growth & Investment Plan	Let's Get to Work, The Last Mile
Does not address using the existing Transit Signal Priority technology on Howard Street to provide faster travel for the Central Light Rail	Recommended in Transit Choices' Quick Hits
Does not provide a detailed strategy for educating the public about the changes prior to their implementation	