BRTC
BALTIMORE REGIONAL TRANSIT COMMISSION

September 30, 2026

Secretary Katie Thomson
Maryland Department of Transportation
7201 Corporate Center Drive
Hanover, Maryland 21076

Re: BRTC Comments on Draft FY2027–FY2032 Consolidated Transportation Program

Dear Secretary Thomson:

On behalf of the Baltimore Regional Transit Commission (BRTC), please let me thank you and MTA for briefing the Commission on the Draft FY2027–FY2032 Consolidated Transportation Program (CTP). We appreciate the ongoing partnership among MDOT, MTA, and the BRTC as the BRTC carries out its statutory responsibility to review and comment on MTA's operating and capital budget for the Baltimore region.

As you know, the BRTC will sunset on October 1, 2026, to be succeeded by the Board of Directors for Core Transit Service and the Commuter Services Advisory Board. In view of this sunset, the BRTC is providing this comment letter for your review and further discussion with these successor entities, which will be starting their work as the CTP is finalized.

The BRTC recognizes and appreciates that MDOT developed the Draft CTP under significant fiscal constraints. In the Draft CTP, these constraints manifest in one of three ways:

(1) projects whose expenditures or delivery schedules have been shifted later in the current CTP;
(2) projects that have been reduced or deferred beyond the current CTP; or
(3) projects and needs that simply remain unfunded.

Each relevant constraint negatively affects the reliability, accessibility, state-of-good-repair, and service delivery that MTA is expected to provide to its riders and the region.

Overall, the BRTC remains deeply concerned about the impact of the Draft CTP on MTA's essential obligations to maintain the transit system riders depend on today, modernize that system, and advance projects needed to enhance and expand regional transit in the future.

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Overall MTA Capital Program

MTA's 6-year capital program increases from approximately $5.688 billion in the FY2026–FY2031 CTP to $5.763 billion in the Draft FY2027–FY2032 CTP, an increase of approximately $74.6 million or 1.3%.

To better understand how the program has changed, the BRTC staff compared the five years common to both CTPs, FY2027-FY2031. During this period, total MTA capital program increases from approximately $4.856 billion to $4.965 billion, an increase of $109 million or 2.3%. However, programmed investment in identifiable Baltimore Core transit projects declines from approximately $2.057 billion to $1.860 billion, a decrease of approximately $197 million or 9.6%.

This decrease does not necessarily mean that funding has been eliminated. Depending on the project, funding may have shifted to FY2032 or later, reclassified, or changed because of project schedules, scope, or even completion. For purposes of our comparison, a decrease means that less funding is programmed for the same project during the same five-year period.

The largest change is for Light Rail, where programmed spending for modernization and systems overhauls declines by approximately $309 million during FY2027-FY2031.

Other areas also show decreases. Agencywide projects decline by approximately $60 million during the common five-year period, while MTA's Minor Projects Program declines from approximately $280 million to $203 million during FY2027–FY2031, a decrease of approximately $78 million or 28%. These changes raise concerns about the timing and funding available for smaller capital needs.

At the BRTC's request, MTA provided supplemental spreadsheets outlining (1) Deferrals, (2) Unfunded Priority Projects, and (3) Unfunded State-of-Good-Repair (SOGR) Needs. These spreadsheets (together, the "**MTA Supplement**") are attached for reference, and show the following:

Deferrals

The MTA Supplement shows approximately **$92 million** in projects deferred, reduced, or shifted within the 6-year program.

The deferrals on the list are troubling. They include replacement of aging escalators, Metro platform and station rehabilitation, Light Rail bridge and grade-crossing work, information technology, rail maintenance equipment, bus-facility improvements, and dedicated bus-lane

maintenance. MTA identifies potential consequences from continued delay including increased corrective maintenance, extended equipment outages, deterioration of infrastructure, and potential service disruptions.

Unfunded Priority Projects

The MTA Supplement shows **$94 million** in unfunded priority projects, including improvements that correct significant water infiltration, station repairs and tunnel repairs for the Metro and track and structures on the Light Rail system.

Unfunded State-of-Good-Repair (SOGR) Needs

The MTA Supplement shows approximately **$307 million** in unfunded state-of-good-repair needs. These include approximately $128 million in Metro needs, $87 million in Agencywide/IT/Mobility needs, $57 million in Bus needs, and $35 million in Light Rail needs.

These needs include Metro guideway, station, power, and water-intrusion improvements; bus facility improvements; fare, communications, security, and technology systems; Mobility improvements; and Light Rail electrical and communications work that MTA identifies as separate from the Light Rail Modernization Program.

These are not long-term or aspirational investments. Many involve existing assets that support today's daily service. Continued deterioration will increase maintenance costs, reduce reliability and accessibility, and ultimately affect service and riders.

***Request*: The BRTC asks MDOT and MTA to produce, before the CTP is finalized, a clearer reconciliation among the recently-updated Capital Needs Inventory (CNI), the funded CTP, the unfunded priority project list, and unfunded SOGR needs. That reconciliation should distinguish (i) needs addressed through completion or reclassification from (ii) those deferred or left unfunded because of fiscal constraints, and explain how MDOT and MTA prioritize remaining needs based on asset condition, reliability, service risk, and cost.**

Backloading and Schedule Stability

The 6-year program totals alone do not fully describe changes in MTA's capital program. In some cases, funding remains in the CTP but expenditures have moved from earlier years into the later years of FY2031 or FY2032. Such shifts have left several project's 6-year funding commitment relatively intact, but they substantially delay project delivery. The common-year comparison described above is intended to make these timing changes more apparent. Where

funding reappears in FY2032 or later, however, the practical result is that expenditures -- and potentially project delivery -- have moved later than contemplated in the previous CTP.

This treatment is particularly notable for state-of-good-repair and modernization projects. For an aging transit asset, moving planned rehabilitation or replacement later in the 6-year program has consequences even if the expenditure remains within the CTP. Aging assets must remain in service longer, interim maintenance may be required, project costs may change, and reliability and accessibility improvements reach riders later.

The BRTC recognizes that single-year changes can result from design, procurement, environmental review, construction sequencing, or other normal project-development considerations, but these are distinctly different from schedule changes necessitated by funding limitations. Where fiscal constraints cause previously programmed expenditures or project milestones to move materially into later years, that is nonetheless a deferral in project delivery.

***Request**: The BRTC asks MDOT and MTA to identify significant MTA projects whose programmed expenditures or delivery schedules have shifted or moved materially to later years compared with the FY2026–FY2031 CTP; explain whether those changes reflect project readiness, procurement and delivery schedules, scope changes, or fiscal constraints; and identify available resources to address those deferrals that may slow progress on these projects.*

The BRTC also has the following project- or mode-specific comments:

Light Rail Modernization

The BRTC strongly supports the Light Rail Modernization Program, which represents a long-needed investment in the future of the Baltimore region's Light Rail system, including replacement of the existing vehicle fleet, station and maintenance-facility modifications, Howard Street rail replacement, traction-power improvements, and other system modernization.

The need for this work is immediate. MTA states that all 52 existing Light Rail vehicles have reached or are approaching the end of their useful lives and that the modernization program is intended to improve system reliability, safety, and performance.

Therefore, the BRTC is concerned not only with the total amount programmed for Light Rail Modernization but also with the timing of that investment. Over the five fiscal years common to

the current and Draft CTPs (FY2027-FY2031), combined programmed expenditures for Light Rail Modernization and Light Rail Systems Overhauls decrease by approximately $309 million. Combining these programs helps account for the reassignment of traction-power rehabilitation between project lines in the Draft CTP. At the same time, substantial Light Rail Modernization expenditures are programmed in FY2032, indicating that a significant portion of the change reflects expenditures moving to later years rather than simply disappearing from the program.

While later-year funding may demonstrate the State's long-term financial commitment, it does not preserve the previous delivery schedule for this extremely time-sensitive work. Deferring planned investment into FY2031 and FY2032 could delay when modernization work is completed and when its reliability, accessibility, and service benefits reach riders. Delaying replacement or rehabilitation would require those assets to remain in service longer and increase reliance on interim maintenance.

***Request**: The BRTC asks MDOT and MTA to provide a year-by-year reconciliation of the Light Rail Modernization Program between the current and Draft CTPs, identifying major expenditures that have moved to later years and explaining the basis for those changes. We also request information on whether the revised cash flow changes anticipated will materially affect the delivery dates for new Light Rail vehicles, station modifications, maintenance-facility improvements, traction-power rehabilitation, Howard Street rail replacement, or other major program elements. This should be considered together with MTA's identification of another approximately $35 million in additional unfunded Light Rail SOGR needs that are not included in the Light Rail Modernization Program. The BRTC asks for a consolidated picture of Light Rail investment showing the Modernization Program, other funded SOGR projects, deferred work, remaining unfunded needs, and expected delivery schedules*.

Metro State of Good Repair

Metro presents similar issues to Light Rail. MTA identifies approximately $128 million in unfunded Metro SOGR needs, the largest modal component of its unfunded SOGR list. Additional priority needs include tunnel and station leak remediation, power-system improvements, and station repairs. These needs are in addition to deferred work involving platforms, stations, escalators, and other system components.

***Request**: Given the concentration of identified needs in Metro, the BRTC asks MTA to provide a prioritized implementation strategy showing how funded projects, deferred projects, and remaining unfunded needs relate to asset condition, reliability, and the risk of service disruption.The BRTC also asks that significant shifts of programmed Metro work into later CTP*

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years be identified separately from projects that have been completed or reclassified. This would provide a clearer understanding of whether the timing of planned rehabilitation is keeping pace with asset needs.

BMORE BUS, Core Bus, and the Fifth Bus Division

The BRTC welcomes the increased investment in Core Bus fleet replacement. The Draft CTP adds approximately $106 million to the bus procurement program, including funding intended to support annual procurements of approximately 67 buses in FY2030 and FY2031. Maintaining a predictable fleet-replacement cycle is important to service reliability and avoiding the higher maintenance costs associated with keeping buses in service beyond their useful lives.

We also strongly support continued advancement of the Fifth Bus Division. The Draft CTP adds approximately $10 million and provides funding for 30% design and property acquisition for that project, with MTA noting that its four existing bus divisions are at capacity.

However, beyond the limited additional funding for the Fifth Bus Division, the Draft CTP makes no commitment to implementing the BMORE BUS plan, which is an essential blueprint for revitalizing and advancing Core Bus service in the Baltimore region. While the Fifth Bus Division is important infrastructure for existing service and a precondition to implementation of BMORE BUS, a greater commitment to BMORE BUS is necessary.

Request: The BRTC asks MDOT and MTA to accelerate the delivery of the Fifth Bus Division by immediately adding both engineering and construction funding, and to make, in this 6-year CTP, a more meaningful financial commitment to the implementation of BMORE BUS.

LOTS and Regional Transit Partners

The BRTC remains concerned about the ability of Locally Operated Transit Systems (LOTS) to replace vehicles, maintain facilities, and respond to growing service needs.

The aggregate CTP comparison shows a reduction in LOTS capital funding, although we understand from the presentation to us that this is a budgetary information timing issue and these funds are still available and will be rolled forward.

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***Request**: The BRTC asks MDOT and MTA to ensure the prior funds programmed are in fact rolled into and appear in the Final CTP. MTA should also continue to work with the Baltimore region's LOTS operators to meet their future needs, as mutually defined.*

Red Line

There is no project more important to the future of regional transit than the long-awaited Red Line. While the BRTC appreciates that $95 million in planning funds are included in the CTP, the CTP includes no construction funds at all.

***Request**: The BRTC urges a prompt conclusion to MTA's pending evaluation of Red Line modes (Light Rail vs. Bus Rapid Transit) and development of a funding plan and project schedule immediately thereafter, with appropriate and necessary adjustments in the CTP to make the Red Line a reality.*

Regional Equity

While total MTA capital programming increases by approximately $109 million during FY2027–FY2031, clearly identifiable Baltimore Core transit projects decrease by approximately $197 million. By comparison, identifiable Washington/other regional projects increase by approximately $414 million, driven primarily by an approximately $403 million increase in Purple Line expenditures.

The BRTC laments any funding competition between the state's regions, but strongly believes there must be equitable distribution of funds to meet the needs of Marylanders throughout the state. Fulfillment of commitments in one region does not justify shortchanging any other region of its equitable share of capital funds. The mere fact that there are pre-existing statutory obligations (such as to WMATA) or cost overruns (such as for the Purple Line) does not justify funding reductions elsewhere. The CTP seems to penalize the Baltimore region for such unrelated expenditures which are of limited, if any, benefit to the region.

***Request**: The BRTC asks MDOT to provide a concise summary of Draft CTP funds programmed by region, and to simultaneously conduct a rigorous review of such regional programming to ensure that Maryland's regions are treated equitably.*

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Conclusion

The Draft FY2027–FY2032 CTP contains important investments in Baltimore-region transit. Our review nevertheless shows that programmed investment in Baltimore Core projects is lower than in the previous CTP, while the MTA Supplement identifies additional deferred and unfunded needs. Major priorities, such as the Red Line and BMORE BUS, are omitted almost completely. Together, these findings demonstrate a continuing gap between the investment necessary to maintain, modernize, and expand the Balimore transit system, and the resources programmed to do so in the Draft CTP.

The BRTC continues to believe that adequate funding is paramount. For the safety of our riders and the reputation of our transit system, we cannot continue to defer or delay SOGR projects. With respect to system enhancement and expansion, as we have said previously, the "plans vs. funding" gap is particularly acute when we have a set of recent plans that, if funded, would propel our regional transit system forward.

We strongly urge the State to identify dedicated revenue sources to provide the necessary funding for system maintenance, preservation, enhancement, and expansion. The region's economic growth requires robust and reliable transit service, and that service will never occur without meaningful sustained investment by the State.

Thank you for your partnership and for your consideration of these comments.

Sincerely,



Jon Laria
Chair

cc: BRTC Commissioners
MTA Administrator Tony Bridges

Attachments: 1. MTA Supplement (Deferrals, Unfunded Priority Projects, Unfunded SOGR Projects)
2. Core Transit Reduction Comparison Chart

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MTA Deferred Projects

MTA CTP Project Deferrals											
Mode	Project Name	Description	Impacts	FY26	FY27	FY28	FY29	FY30	FY31	FY32	Total 6 Year
Agencywide	AGY IT	Holding account for future IT projects	Eliminates growth in IT funds intended to address a variety of obsolescence and IT hardening needs	$ (0)	$ -	$ (0)	$ (0)	$ -	$ (7,969,505)	$ (10,688,250)	(18,657,755)
Agencywide	AGY Replacement of 81 Escalators	Multi-year design-build project to replace escalators throughout MTA that have exceeded their useful life and are experiencing maintenance and obsolescence issues	MTA no longer has a plan for rehabilitating escalators; should they break beyond what can be handled by our maintenance staff, they will be out of service indefinitely	$ 0	$ (0)	$ (2,000,000)	$ (2,000,000)	$ (6,000,000)	$ (10,000,000)		(20,000,000)
Agencywide	AGY Radio Shop CCTV Maintenance	Replacement of CCTV hardware components when failures occur	When hardware failures occur, CCTV equipment will remain out of service limiting MTA's security protocols within the transit system.	$ (448,578)	$ (500,000)	$ -	$ -	$ (81,168)	$ -		(1,029,746)
Agencywide	AGY MOW - Brandt Truck	Purchase of a Hi-Rail maintenance truck that will expand and make more efficient the work Maintenance of Way forces can complete for Metro and Light Rail repairs	Lack of efficiency in rail maintenance and reduced ability to address certain repair needs without additional contract costs.	$ -	$ (1,800,000)	$ -	$ -	$ -	$ -		(1,800,000)
Agencywide	AGY FY 2031 Priortization	Funds allocated last year to begin to build a funding program to support MTA and local project feasibility studies as envisioned in MDOT's project prioritization approach.	No funds planned for future transit expansion feasibility studies to partner with local jurisdictions.	$ -	$ -	$ -	$ -	$ -	$ (10,000,000)		(10,000,000)
Agencywide	AGY Feasibility Studies			$ (750,000)	$ (750,000)	$ -	$ -	$ -	$ -		(1,500,000)
Bus	BUS Washington Blvd Paint Booth Replacement	Replacement of a bus paint booth at Bush Division.	Less capacity to complete bus re-painting.	$ (1,457)	$ (38,550)	$ (1,045,000)	$ (1,900,000)	$ (500,000)	$ (600,000)		(4,085,007)
Bus	BUS Fast Forward Dedicated Bus Lanes	Funding allocated for planned re-painting of red dedicated bus lanes on a periodic cycle.	Fading of dedicated bus lanes reduces compliance by vehicular traffic and reduces the effectiveness of the dedicated lanes.	$ 0	$ (736,569)	$ -	$ -	$ -	$ -		(736,569)
Light Rail	LTR SGR Design Group N4 - Hunt Valley Grade Crossings	Rehabilitation of grade crossings in the Hunt Valley area that are exhibiting deterioration.	Track conditions could degrade to the point of disrupting service. Vehicular traffic will also have poor ride quality.	$ (839,619)	$ (485,446)	$ -	$ -	$ -	$ -		(1,325,065)
Light Rail	LTR Replacement of Structural Timber Ties at 3 Bridges	Replace rotting timber rail ties on three rail bridges.	Track conditions could degrade to the point of disrupting service.	$ -	$ (6,507,045)	$ -	$ -	$ -	$ -		(6,507,045)
Metro	MTR Platform Rehabilitation & Snow Melt System	This is a series of investments in metro stations to address spalling concrete, noted hazards, and deteriorating platform, stair, and structural member conditions.	Delays to station repairs will result in increased corrective maintenance for the station, including potential emergency stations closures for needed repairs.	$ (320,862)	$ (565,000)	$ (6,000,000)	$ (6,000,000)	$ (1,000,000)	$ -		(13,885,862)
Metro	MTR Repairs at 6 Metro Stations			$ (72,851)	$ (1,599,731)	$ (4,197,000)	$ -	$ -	$ -		(5,869,582)
Metro	MTR Tunnel Stray Current Monitoring System	Automated monitoring system for electrical current travel in the metro system. Stray current can cause rapid deterioration and corrosion of nearby metals.	Increased manual inspection costs and potential costly accelerated deterioration of metro rail assets due to undetected stray current.		$ (750,000)	$ -	$ -	$ -	$ -		(750,000)
Metro	MTR New Railcar Shop Equipment (Mobile Railcar Mover)	Purchase of a railcar mover that will increase efficiency of railcar maintenance	Lack of efficiency in railcar maintenance which can reduce the railcars available for service on a daily basis.	$ (369,035)	$ -	$ -	$ -	$ -	$ -		(369,035)
Metro	MTR Shot Tower Station Enhancements	This is a series of investments in metro stations to refurbish and refresh lights, handrails, finishes, and clean up water damage	Metro stations show greater signs of wear and visible deterioration contributing to a perception of disrepair and lack of caretaking.	$ -	$ (825,000)	$ -	$ -	$ -	$ -		(825,000)
Metro	MTR Johns Hopkins Metro Station Enhancement			$ -	$ (500,000)	$ -	$ -	$ -	$ -		(500,000)
Metro	MTR Penn-North Metro Station Enhancement			$ -	$ (500,000)	$ -	$ -	$ -	$ -		(500,000)
Metro	MTR Milford Mill Metro Station Enhancement			$ -	$ (250,000)	$ -	$ -	$ -	$ -		(250,000)
Metro	MTR Elevator and Escalator Preservation Maintenance	Maintenance services for minor repairs to elevators and escalators	Deferring maintenance for two consecutive years is likely to extend service disruptions when equipment fails.		$ (1,976,362)	$ (2,050,000)		$ 4,026,362			-
Metro	MTR Interlockings Reisterstown	Replacement of metro interlocking that has deteriorating condition reports and is beyond the capacity of maintenance forces to repair.	Three year delay. Failed interlocking could result in service disruptions. Special trackwork materials are already purchased with risk that the delay will allow materials to degrade in storage.			$ (2,556,200)		$ -	$ -	$ 2,556,200	-
Multiple	Multiple Program Management	Reductions to staff support and program management funds across the agency.	Reduced capacity to manage projects and contracts, respond to system conditions, and advance departmental work.		-$4,530,163	-$4,953,200	$0	$5,970,013			(3,513,350)
				-$2,802,401	-$22,313,866	-$22,801,400	-$9,900,000	$2,415,207	-$28,569,505	-$8,132,050	-$92,104,016
			METRO	-$762,748	-$6,966,093	-$14,803,200	-$6,000,000	$3,026,362	$0	$2,556,200	-$22,949,479
			CLRL	-$839,619	-$6,992,491	$0	$0	$0	$0	$0	-$7,832,110
			AGYWIDE	-$1,198,577	-$3,050,000	-$2,000,000	-$2,000,000	-$6,081,168	-$27,969,505	-$10,688,250	-$52,987,501

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MTA Unfunded Priority Projects (projects ready to advance but unfunded)

Mode	Project Name	Cost Estimate
Metro	Shot Tower Station Leaks	$15,000,000
Metro	Penn North/Mondawmin/ Upton Station Leaks	$6,000,000
Metro	State Center Leak and Structure Repairs	$1,600,000
Metro	MTR Substation Breaker Rehab	$3,000,000
Light Rail	Light Rail Catenary Rehab Overhead Contract System Central Business District	$5,000,000
Light Rail	LTR Protran Upgrade	$3,447,793
Metro	Metro Tunnel Rehab	$24,000,000
Agencywide	Corrosion Control Services	$3,000,000
Agencywide	NextGen Signal and Communications Upgrade	$660,000
Agencywide	Fare Collection - Open Payment Project	$4,900,000
MARC	MARC Odenton Station Platform Replacement	$1,500,000
Bus	BUS Bush Building 8 HVAC Upgrades	$4,400,000
Light Rail	Conway and other LTR Repairs (Track and Structures)	$20,000,000
Purple Line	Purple Line Police Equipment	$1,500,000
		$94,007,793

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MTA Unfunded State-of-Good-Repair Needs (projects to be defined by study)

Mode	Asset-Based SGR Needs	Cost Estimate
Metro	Leak remediation, Guideway, Systems and Stations projects including rehab or replacement of contact rail, aerial piers, switch heaters, and substation breaker	$128,000,000
Light Rail	Includes time-sensitive repairs to catenary/electrical system and communications systems that are not included within LRMP	$35,000,000
Bus	Includes improvements to bus facilities such as HVAC, roof and window replacements, bus wash upgrades, fall protection, parts management, etc.	$57,000,000
Agencywide/IT/Mobility	Fare systems, Mobility scheduling system and facility upgrades, compliance with updated environmental regulations, network and server expansions, access control system upgrades, etc.	$87,000,000
		$307,000,000

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Core Transit Reduction Comparison Chart

Baltimore Core Transit Projects that changed in Draft CTP during FY2027–FY2031

Reductions	**Change**	**Additions**	**Change**
Light Rail Modernization	−$228.8M	Bus Procurement	+$70.0M
Light Rail Systems Overhauls	−$79.8M	Eastern Bus Facility	+$36.7M
Metro Station Rehabilitation	−$19.2M	Alternative Fuel Bus Procurement	+$16.2M
Metro Railcar & Signal Overhauls	−$10.7M	Red Line	+$15.5M
Mobility Vehicle Procurement	−$7.3M	Fifth Bus Division	+$8.4M
Metro/LR Maintenance of Way	−$1.7M	Metro Systems Overhauls	+$3.1M
Metro Tunnel Repairs	−$1.1M	Bus Facilities Preservation	+$1.2M
Light Rail Vehicle Overhaul	−$0.7M	Zero-Emission Bus Infrastructure	+$1.0M
East-West Priority Corridor	−$0.4M	Other/net project changes	+$0.8M
Fast Forward	−$0.2M		
Total reductions:	**−$349.9M**	**Total additions:**	**+$153.1M**
NET BALTIMORE CORE CHANGE		**−$196.8M**	