

May 27, 2022

The Honorable Adrienne A. Jones
Speaker of the House of Delegates
H-101 State House
Annapolis, MD 21401

Dear Madam Speaker:

In accordance with Article II, Section 17 of the Maryland Constitution, I have vetoed House Bill 141 – *Equity in Transportation Sector – Guidelines and Analyses*.

The Federal Transit Administration (FTA) is in the process of updating the Title VI Circular, and it is anticipated that there will be new federal Title VI guidance available later this year. Thus, the federal Title VI landscape for equity analyses, capital projects, service changes, and how Disparate Impact and Disparate Burden are calculated could change prior to the Maryland Department of Transportation Maryland Transit Administration's (MDOT MTA) upcoming June 2022 service change. With the possibility of a regulatory landscape change later in 2022, it is likely that this legislation could be preempted or superseded by new federal guidance and regulations. Adopting new state requirements as the federal requirements are being updated will result in conflicts, inconsistencies, or other unintended consequences.

I am supportive of the intent of this legislation to improve transit, as demonstrated by my record-level investment in transit to date, but it must be done in a fiscally responsible manner and in one that does not limit MDOT's ability to adapt to evolving conditions. Binding the MDOT MTA to the requirements in House Bill 141 while the FTA is anticipated to release guidance in the same subject area will ultimately result in conflict and confusion while implementing possibly competing guidance.

For these reasons, I have vetoed House Bill 141.

Sincerely,

Lawrence J. Hogan, Jr.
Governor