



Hon. Ben Barnes
House Appropriations Committee

Hon. Marc Korman
House Environment And Transportation Committee

RE: HB230 — Transportation - Consolidated Transportation Program - Prioritization (Transportation Investment Priorities Act of 2026)

Position: Oppose

On behalf of the American Council of Engineering Companies Maryland (ACEC/MD), we respectfully oppose HB230. ACEC/MD represents Maryland’s private-sector engineering firms that design and deliver the transportation, water, environmental, and public works infrastructure that local governments and the State rely upon every day. Our members are deeply invested in stable, predictable transportation funding because it drives capital planning, project readiness, and delivery performance and economic growth across Maryland.

We recognize and appreciate that the Maryland Department of Transportation (MDOT) has proactively shared information about the proposed project-based scoring process and has engaged stakeholders in discussions about improving the CTP framework. We also agree there is a need for a more efficient, predictable CTP process that allows projects to move more smoothly through the development pipeline and provides the public and local governments with a clearer understanding of how major surface transportation projects are evaluated and advanced. However, despite this outreach, we remain concerned that HB 230, as constructed, could unfairly skew outcomes and does not yet deliver the mode-neutral, transparent, and easily understandable framework that Maryland needs.

Mode Neutrality, Road Users, and Highway Needs

As written, the project-based scoring structure and the redefined goals risk unfairly advantaging transit, rail, and multi-modal projects over needed highway improvements that serve the vast majority of Marylanders’ daily trips. Recent commuter data indicate that auto mode share for commute trips increased from 69% in 2023 to 74% in 2024 as a decreasing share of trips were displaced by telecommuting: 17% in 2023 to 14% in 2024.¹ In addition, the study found “the portion of commute trips made by transit decreased, despite overall increases in transit volume reported by regional operators. This indicates that **new commuters, including those transitioning from telecommuting, adopted transit at a lower rate than auto modes.**”² Lastly, another recent article noted “Marylanders are spending more time on the road, with the state’s average one-way commute time rising to 31.5 minutes in 2023, **the second longest commute in the country**, according to the latest Census Bureau data.”³

Despite this clear usage pattern, the criteria in HB 230 only indirectly address congestion, **even**

¹ *Maryland Commuter Survey*. NCSG. (n.d.). <https://www.umdsmartgrowth.org/projects/maryland-commuter-survey/>

² *Id.*

³ Smith, S. (2025, November 30). *Maryland has the second highest commute time in the U.S., new numbers show - maryland matters*. Maryland Matters. <https://marylandmatters.org/2025/11/30/maryland-has-the-second-highest-commute-time-in-the-u-s-new-numbers-show/>



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though congestion and travel time reliability are core elements of Maryland's economic competitiveness and its ability to attract and retain residents and businesses. A scoring system that does not directly and explicitly weight congestion relief, travel time savings, and network performance risks deprioritizing projects that are critical to commuters, freight movement, and regional economic growth, particularly in areas where transit is not a realistic alternative for most trips. At a minimum, any statutory scoring framework should be explicitly mode-neutral, ensuring that highway, transit, and multi-modal projects are evaluated fairly based on their relative contributions to safety, mobility, and economic development, without predetermining favored modes in practice.

Mobility for the Vast Majority of Residents

While transit and multi-modal investments are essential components of a balanced system, the criteria established in HB 230 do not clearly and directly address the mobility challenges faced by the vast majority of the traveling public, particularly in suburban and rural areas where transit options are limited. Each year, every local jurisdiction submits a list of its highest-priority transportation projects, including those related to transit, roadways, and bicycle or pedestrian improvements. In some cases, local matching funds may be available through specific sources, such as casino impact funds or developer proffers, but the project scoring process could affect eligibility for these funds. Many of these funding sources also carry time constraints, requiring that the funds be used within a set number of years or risk being reclaimed by the provider. Local input of what their constituent need should not be overlooked for a one-size fits all plan.

The bill's restructured goals, focusing on accessibility and mobility, climate change and the environment, social equity, economic development, and sustainable land use and transportation demand management, **leave congestion and travel time reliability only as indirect considerations, if at all.** Without explicit recognition of congestion relief, travel time savings, and network performance, Maryland risks under-investing in critical highway improvements that support job access, goods movement, and quality of life for most residents.

Cost-Benefit and Efficient Use of Funds

From a cost-benefit perspective, it is essential that the CTP's project-based scoring framework compare investments on a consistent basis, including cost per user, cost per unit of travel time saved, and cost per unit of reliability or safety improvement. **Given that highways carry the overwhelming majority of trips and support freight and service movement statewide, even modest improvements to key corridors can generate substantial aggregate travel time savings and economic benefits.** If the statutory criteria effectively down-weight congestion relief and travel time improvements, where highway projects often perform strongly on a per-dollar basis, the State could end up steering limited dollars toward projects that serve far fewer users at higher cost, reducing overall system efficiency and economic return.

A mode-neutral, analytically grounded scoring framework should explicitly incorporate user volumes and cost-effectiveness metrics so that projects across all modes are compared fairly on benefits delivered per dollar invested. Without that explicit direction, there is a risk that the scoring process will favor projects that align with broadly stated goals but do not provide the greatest mobility or economic benefit for the majority of Marylanders.

Competitiveness and Clarity Compared to Neighboring States

Maryland competes directly with surrounding states for jobs, residents, and private investment, all of which depend on a transportation network that can reliably move people and goods. If the CTP scoring framework does not clearly elevate congestion relief, regional mobility, and economic connectivity, Maryland may fall farther behind neighboring jurisdictions that have aggressively addressed highway congestion and bottlenecks as part of their economic strategy. North Carolina has explicitly used targeted investment in highways and congestion relief as part of its economic strategy, and it is now one of the fastest-growing states. We do appreciate the intent to make the CTP process more streamlined and understandable, including requirements to publish project scores, rankings, and recommended funded projects. However, the statutory language describing the goals and scoring structure remains too vague and high-level, which will inevitably lead to differing interpretations, inconsistent application over time, and uncertainty for local governments and project sponsors.

A system that is not clearly defined in statute will be harder to compare to peer states' approaches and may send mixed signals to employers and residents evaluating Maryland's long-term infrastructure strategy. To truly improve competitiveness, the CTP process must be both streamlined and easily understandable, with clearly defined, measurable, and mode-neutral criteria that the public and stakeholders can see applied consistently over time.

Vagueness of Goals and Risk of Differing Interpretations

The bill replaces more specific, measurable goals, such as system preservation, reducing congestion and improving commute times, environmental stewardship, and local priorities, with broad concepts like climate change and the environment, social equity, economic development, and sustainable land use and transportation demand management. While these are important policy areas, the statutory language does not provide clear, objective direction on how trade-offs will be evaluated across projects, modes, and regions. This vagueness will almost certainly result in differing interpretations across administrations and staff, making it harder for local governments, the public, and private sector partners to understand how projects will score and how decisions are made.

Over time, this could erode confidence in the CTP process rather than build it, and could make it more difficult to align local land use and transportation priorities with State investment decisions. Clarifying and tightening the language of the goals so that they are measurable, mode-neutral, and explicitly connected to congestion relief and mobility for the majority of users would significantly improve the bill.

Conclusion and Request

We support the goal of an improved, more transparent CTP process that moves projects more efficiently and gives the public clearer insight into how transportation investments are prioritized. However, HB 230 as drafted risks unfairly advantaging transit, rail, and multi-modal projects over essential highway improvements, only indirectly addresses congestion, a core driver of Maryland's competitiveness, and relies on vague statutory goals that will lead to differing interpretations and



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uncertainty. **In short, Maryland has the 6th worst roads in the Country⁴ and the second longest average commute time. This bill will exacerbate these issues.**

For these reasons, we respectfully request an unfavorable report on House Bill 230 and stand ready to work with the Committee, MDOT, and other stakeholders on a mode-neutral, clearly defined framework that better addresses the mobility needs of Maryland's residents and employers while advancing the State's policy goals.

Respectfully,

Maria K. Donovan

Maria Donovan
Executive Director
ACEC/MD

⁴ U.S. states with the worst roads [2025 edition]. (n.d.). <https://constructioncoverage.com/research/states-with-the-worst-roads>