



MTBMA Position: MDOT Project Prioritization (HB 230/SB 62)

Background: In August 2025, MDOT met with stakeholders, including MTBMA, to discuss the proposed revision of the prioritization process. Following the meeting, MTBMA had follow up questions and requested materials. In December 2025, MTBMA met with MDOT to better understand the Department's updated approach to prioritizing surface transportation capacity enhancing projects within the Consolidated Transportation Program (CTP). MDOT has represented that this new framework is intended to be fair geographically, mode neutral, and designed to maximize benefit per dollar through a quantitative ranking process.

MTBMA's core concern remains unchanged: this new prioritization process lacks proper research, revision, and independent verification. Thus, the new scoring structure could systematically disadvantage traditional surface capacity projects, even if MDOT can identify isolated roadway projects that scored well in their pilot program.

What MDOT is proposing: MDOT's Technical Guide states the new project prioritization process is a data-driven, performance-based evaluation system for capacity enhancing projects requesting CTP funding, intended to maximize the value of transportation investments and align programming decisions with the State's values.

MDOT also states that the approach was first implemented as a "pilot round with no funding in 2025." MDOT's slide deck likewise describes the objective as improving predictability and transparency compared to the current Chapter 30 practice, emphasizing that stakeholders often cannot tell when/if a project will proceed, how to improve its chances, what criteria apply, or what funding is available.

Why further research should be conducted first: MTBMA wants to be clear that we support the development of a new, transparent transportation project prioritization process. MTBMA President & CEO Michael Sakata served on the TRAIN Commission, which recommended that the State conduct a thorough, funded study of any proposed new prioritization framework and submit the results to the Commission for review. We fully support that recommendation. Moving forward, we believe the new process should be validated through a comprehensive, funded study and then formally circulated to the TRAIN Commission and relevant stakeholders for official review and comment before implementation.

In 2024, Maryland applied for and received a \$2 million federal Prioritization Process Pilot Program (PPPP) grant to refine and pilot its updated project prioritization framework. The purpose of the PPPP program is to allow states to develop, test, and improve their prioritization processes before institutionalizing them long term. It supports pilot testing, stakeholder engagement, tool development, and evaluation.

In other words, it is designed to refine a framework while it is still evolving. MTBMA believes that a strong process will involve local governments, regional planning organizations, and metropolitan planning partners. These partners are central to how projects are developed, prioritized, and delivered. While MTBMA was privy to one meeting with MDOT in August, and another at our request in December, we were not provided with the sufficient materials (despite requests) that would ensure a collaborative & thorough path forward.

Furthermore, MDOT has currently programmed \$10 million in the CTP for feasibility studies of state money. Before embedding this structure in law, MTBMA believes that elected leaders, transportation experts, and the public should understand how this scoring framework interacts with those investments and how it changes real-world outcomes. The Governor has said the days of “no and slow” are over and the days of “yes and now” are here. If that is our shared goal, we should ensure this framework speeds delivery — not add another statutory step before construction.

Lastly, this bill links project scoring to benefits relative to cost to the State. That creates an incentive that will favor jurisdictions able to lower the State share through a local match. That may be reasonable policy, but we should fully understand how it affects rural and fiscally constrained counties before locking it into law.

Once this is written into law, changing course requires legislation. Our request is simple: complete the federally funded refinement, publish the pilot data, and return with a fully defined process so everyone understands what they are voting on.

Why the pilot cannot be treated as proof for a sound new prioritization framework: MDOT has pointed to its “pilot” experience to support claims of neutrality, but MTBMA’s issues are as follows: the pilot was too limited, too small, and insufficiently verifiable to validate the framework. We are also concerned that MDOT has not yet shared its pilot results publicly, which makes outside verification impossible. MDOT confirms the system was implemented as a pilot round with no funding in 2025.

MTBMA’s concern is that the pilot:

- involved a small sample size (fewer than ~50 projects) and was unfunded, meaning it did not test outcomes under real programming pressure;
- was not accompanied by the actual underlying scoring dataset, assumptions, or outputs needed for independent verification; and

- was based on case studies that MDOT itself acknowledged were sometimes **missing information** or **not fully accurate**, undermining confidence in the results and in any “high or low scoring” examples used to justify the approach.

That combination matters because MDOT’s scoring approach is input-sensitive by design: applications require detailed scope, feasibility-level detail, and updated cost estimates, and incomplete or inconsistent inputs can materially change results.

When MTBMA and MDOT met in December, we reviewed examples of projects that scored high and low. One of the lowest scoring projects they showed was a MARC Station, which was surprising to our team. MDOT admitted that the MARC project was likely missing submittal materials and that is why it scored low.

Despite countless requests to access the data, MTBMA nor public stakeholders have been able to review the validity of the pilot further than the few projects mentioned in meetings. MTBMA cannot accept pilot outcomes as validation for this new prioritization process unless the underlying data and assumptions are released and defensible.

The scoring system: MTBMA believes that the lack of thoroughness in the pilot study has led to an imbalanced proposed scoring system. Here is how the scoring system works:

- **Eligibility: what is being scored**
 - The criteria system applies to “surface transportation capacity enhancing” projects meeting the state funding request threshold (at least \$5M and under \$400M), located on or benefiting the state system, and far enough in design to provide required inputs.
 - MDOT frames eligibility across highway, transit, passenger rail, bike/ped, and TDM - but only where the project results in capacity expansion.
- **Measures: what “counts” as high performance**
 - MDOT scores projects under six goal areas and 11 measures, including: safety, job access, non-single-occupancy-vehicle (non-SOV) trips, emissions reduction, delay reduction, land productivity uplift, and sustainable land use indicators like Walk Score and projected growth.
 - Projects receive a 0–100 score for each measure, scaled against the highest performing project, then weighted and combined into a total score.
- **The most important step: benefit-per-dollar ranking**
 - Finally, MDOT converts total score into a “Score-Cost Ratio (SCR)” by dividing the total score by the state funding request, then ranks projects based on SCR.

This structure is central to MTBMA’s concern: even if two projects deliver meaningful benefits, the higher-cost project is inherently pushed downward in the ranking

because SCR rewards measurable benefit at the lowest cost. While this may be valuable in theory, it is not practical in implementation. Counties that have more money to bring to the table up front almost immediately outweigh less wealthy areas, especially those who are rural and may score lower on other criteria as well.

Why MTBMA remains concerned about modal bias:

MTBMA's worry is not that highway and rural projects can *never* score well - rather, that the framework structurally creates more scoring "headroom" for certain project types and penalizes large corridor projects that are costly but essential. Several measures are inherently easier to maximize for transit/ped/TDM investments or for projects located in dense, high-value, high-growth areas. Please note that the below criteria, while they may not be explicitly noted in HB 230/SB 62, they were provided in documents to MTBMA and stakeholders as subsets within the legislation's criteria.

- **Non-SOV Trips (Measure #4)**
 - This measure credits new transit trips (provided by the applicant) and predicted new cyclists using an external NCHRP methodology and population density/commute share assumptions.
 - A traditional highway capacity project is unlikely to score strongly here unless it includes major non-SOV components.
 - While this may be in alignment with the climate change initiatives from the Administration, it is not in alignment with economic growth (also an initiative from the Administration), as SOV trips are by far the most common way that commuters get to work.
 - This highly favors urban areas.
- **Land Productivity Uplift (Measure #10)**
 - MDOT estimates land value uplift for parcels within ¼ mile of the proposed project, using assessed value and zoning-based "potential uplift" assumptions and applying uplift coefficients (75% for new service, 10% for expansion).
 - This can inherently favor dense, already high-value corridors - often aligned with transit investments - while undervaluing benefits delivered by highway improvements in freight and regional mobility corridors.
 - Furthermore, it is interesting that this criteria inherently favors urban areas, but not actually incentivizing new development. Thus it could easily disfavor rural areas.
- **Sustainable Land Use (Measure #11)**
 - MDOT uses Walk Score and projected population/employment growth, tied to overlapping neighborhoods and zip codes. This methodology will generally reward areas that already score well on walkability and growth - again creating a structural advantage for certain geographies and investment types.
- **Reduction in Greenhouse Gas Emissions (Measure #5)**

- The GHG reduction measure subtracts a modeled induced demand adjustment using the RMI SHIFT calculator, and projects with negative net outcomes are set to zero.
- This may suppress climate performance for roadway capacity projects regardless of operational congestion improvements.
- For example, if a highway project aimed at relieving congestion from nearby neighborhoods or roads reduces congestion enough to save fuel and reduce emissions by 5,000 tons, but adds back in 6,000 tons worth of emissions due to the increase of drivers on that new project, the net outcome will be +1,000 tons. This will reflect negatively on the scoring – even though it would relieve congestion in nearby neighborhoods.
- **Reduction in criteria pollutants (Measure #6)**
 - Measure #6 appears to rely heavily on VMT-driven impacts, which can inherently favor projects that reduce driving over projects that improve roadway efficiency and freight reliability.
 - While air quality improvements are critical, VMT is also strongly associated with economic activity and goods movement. MTBMA is concerned that using VMT as a primary driver of scoring may unintentionally penalize projects that are essential to regional mobility, supply chain performance, and broader economic growth, even when those projects reduce congestion and improve safety.
 - It also does not account for increasing fuel-efficiency and air quality improvements made in traditional vehicles, as well as increasing adoption of electric and hybrid vehicles.
- **Score-cost ratio (SCR) “cost normalization” will systematically compress large highway projects and favor urban areas**
 - Even if a highway corridor project has major safety, freight, and delay benefits, its SCR can be depressed simply because corridor work is expensive relative to smaller multimodal interventions.
 - This is not a theoretical issue -- it’s how the model is designed. Counties with urban areas and money to match up front will be highly favored, especially put together with the above criteria.

MTBMA’s key requests to MDOT before we can support implementation: To evaluate whether this model is truly mode neutral, geographically unbiased, and workable for surface transportation programming, MTBMA needs the following clarifications and commitments.

1. Data transparency and pilot validation

- a. Release the full pilot dataset (all projects, all measure outputs, all intermediate calculations, final scores, and SCR rankings), along with a methodology memo documenting any substitutions or missing inputs and how they were handled.
- b. Disclose which pilot projects had incomplete inputs and how MDOT corrected for missing or inconsistent information.

- c. Confirm whether any pilot results were re-scored after corrections, and provide both original and revised outputs.
- d. MDOT has stated "scoring materials are shared online after each round of prioritization." MTBMA needs MDOT to apply that principle to the pilot and make the full outputs available now.

2. Prove mode & geographical neutrality

- a. Provide an analysis showing how projects perform by mode type and by cost band, including whether SCR ranking systematically disadvantages projects above certain cost ranges and locations.
- b. Provide sensitivity testing showing how highway corridor projects compare to transit/ped projects when:
 - i. safety benefits are dominant,
 - ii. delay reduction is dominant, and
 - iii. projects are in rural/suburban contexts vs urban contexts.
- c. Provide reasonable explanation for how less dense regions of the state are expected to score highly.

3. Specific rubric elements that may skew outcomes

- a. **Land Productivity (Measure #10):** Explain why assessed-value uplift is an appropriate proxy for statewide transportation value, and whether the 75th percentile uplift methodology disproportionately rewards already high-value areas.
- b. **Sustainable Land Use (Measure #11):** Explain why Walk Score and projected growth should materially influence a capacity-expansion competition, and whether it functions as an urban density proxy.
- c. **Non-SOV Trips (Measure #4):** Confirm how applicant-provided transit ridership estimates are validated and standardized across proposing entities to prevent inconsistent forecasting assumptions.
- d. **GHG (Measure #5):** Provide the induced demand adjustment sensitivity, and clarify how "negative outcomes set to zero" affects roadway expansion scoring.
- e. **Criteria Pollutants (Measure #6):** Remove VMTs as scoring criteria; replace with a different criteria pollutant metric.

4. Surface transportation preservation vs capacity (separate but related concern)

- a. MTBMA's formal opposition to HB 20 (last year's legislation) also reflected concerns that the bill removed system preservation as a factor when evaluating projects, potentially increasing long-term costs and harming the broader transportation program.
 - b. Even though the new MDOT scoring framework is aimed at "capacity enhancing" projects, MTBMA continues to view state of good repair and system preservation as essential to economic growth, safety, and cost containment, and wants assurance that prioritization reforms do not indirectly deprioritize preservation in future programming decisions.
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MTBMA's Position

MTBMA supports transparency and a clearer pathway for project advancement. However, MDOT's proposed framework, as currently structured, still raises credible concerns that rural and roadway capacity projects will face an uphill battle due to (1) measure design, (2) benefit-per-dollar normalization, and (3) scoring proxies that tend to reward dense, transit-supportive contexts.

MDOT's pilot does not resolve those concerns because it was unfunded, limited in sample size, and not accompanied by the underlying data necessary to validate the outcomes -- especially given MDOT's own acknowledgment that some pilot case inputs were incomplete or inaccurate.

Before MTBMA can support implementation, MDOT must provide full transparency of pilot results, verify data integrity, and demonstrate through analysis -- not assertion -- that the scoring system does not structurally disadvantage surface transportation projects that deliver critical statewide safety, mobility, freight, and economic benefits.

It is MTBMA's recommendation that MDOT complete the federally funded refinement, publish the pilot data, and return with a fully defined process with collaboration from local governments, metropolitan planning organizations, and input from an expert commission or stakeholder group.

Questions

Pilot design, transparency, and reliability:

- 1) MDOT has referenced results from a small, unfunded pilot to support the neutrality of the rubric. Will MDOT provide MTBMA the full pilot dataset, including every project evaluated, all raw inputs, measure-by-measure scores, weights applied, and final Score-Cost Ratio (SCR) rankings, so stakeholders can independently verify outcomes?
- 2) MDOT has acknowledged that some pilot case studies contained missing, inconsistent, or incomplete project information that affected scoring accuracy. What quality control standards were used to address incomplete inputs during the pilot (including assumptions or substitutions), and will MDOT provide a written summary identifying which pilot projects were impacted and how those issues were resolved?
- 3) Given the pilot was small (fewer than ~50 projects) and had inaccuracies, what analytical basis is MDOT using to treat the pilot as representative of statewide programming decisions across modes and geographies?
- 4) What is the reasoning for not continuing with the federally funded grant program to fund a more thorough pilot study?
- 5) What is the reasoning for not providing the prioritization process (including the pilot data) to local governments, metropolitan planning organizations, and expert commissions or stakeholder groups? How can MDOT ensure that this is a thorough framework?

Structural scoring effects on surface transportation projects:

- 1) Because projects are ranked by Score-Cost Ratio (SCR), higher-cost corridor investments can be suppressed in rankings purely due to scale, even when statewide safety, freight, and mobility benefits are substantial. Has MDOT performed sensitivity analysis by cost band and project type, and what guardrails does MDOT propose to prevent essential corridor projects from being structurally disadvantaged?
- 2) Measure #10 scores projected land value uplift within ¼ mile based on assessed value and zoning assumptions. How does MDOT justify this as a proxy for statewide transportation benefit, and what safeguards prevent this measure from structurally favoring already high-value, dense corridors while undervaluing benefits delivered by highway and freight investments in suburban and rural regions?
- 3) Measure #11 incorporates Walk Score and projected population/employment growth. How does MDOT ensure these inputs do not function as proxies for urban density that systematically elevate transit/ped/TDM projects over highway capacity projects - even where highway projects address major regional congestion, freight movement, and safety needs?
- 4) Measure #4 analyzes non-SOV trips. What is the policy rationale for using "new non-SOV trips" as a scoring measure rather than directly scoring the outcomes the State is trying to achieve (e.g., safety, travel time reliability, freight

performance)? Does MDOT acknowledge that this measure effectively creates a built-in preference for transit/ped/TDM investments regardless of corridor need?

- 5) For Measure #5, MDOT subtracts a modeled induced demand adjustment using the RMI SHIFT calculator and sets negative net outcomes to zero for scoring. How sensitive are roadway capacity projects to this adjustment, and will MDOT provide a written explanation of how the induced demand factor is applied across roadway project types (e.g., interchange improvements vs. general purpose lanes vs. managed lanes)? How will relieving congestion in nearby neighborhoods, for example, positively affect a project if the emissions on the highway project itself increases?
- 6) To what extent does Measure #6 effectively operate as a VMT-reduction score, and has MDOT evaluated whether this structurally penalizes highway and freight corridor investments that support economic activity and mobility – even when those projects improve speeds, reduce idling, and enhance reliability?

Policy alignment: VMT and non-SOV as “value” signals vs economic competitiveness goals:

- 1) Several elements of the scoring system appear to reward reductions in VMT and increases in non-SOV trips. While these may align with certain policy objectives, both VMT and travel activity are also closely tied to economic growth, workforce mobility, and goods movement. How does MDOT ensure the rubric does not inadvertently devalue projects that support economic competitiveness - creating a contradiction with the Administration’s stated economic growth goals?
- 2) Where and how does the rubric directly account for freight reliability, supply chain performance, port access, and truck mobility, particularly for corridor projects that deliver statewide economic benefits even if they do not maximize non-SOV or land uplift metrics?

Sources:

- 1) MDOT’s Project Prioritization Pilot Grant Submission - <https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:23a2f1dd-3fc1-4484-8b15-912b8d9da984>
- 2) MDOT’s Project Prioritization Technical Guide - <https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:3beff30a-83d9-4c65-89c0-413313547c29>
- 3) Chapter 30 Update: Proposed Project Development Process Stakeholder Meeting - <https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:3beff30a-83d9-4c65-89c0-413313547c29>
- 4) MTBMA meeting with MDOT on 12.5.25 - <https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:3f40f768-0b2c-41e8-ac14-a4a3678f144e>
- 5) [Legislation - HB0230](#)