



Larry Hogan
Governor
Boyd K. Rutherford
Lt. Governor
Gregory Slater
Secretary

March 25, 2021

The Honorable Paul Pinsky
Chair, Senate Education, Health, and Environmental Affairs Committee
2 West Miller Senate Office Building
Annapolis, Maryland 21401

Re: Letter of Information – House Bill 656 – Election Law – Early Voting Centers – Bus Stops

Dear Chair Pinsky and Committee Members:

The Maryland Department of Transportation (MDOT) takes no position on House Bill 656 but offers the following information for the committee’s consideration.

As amended, House Bill 656 requires, to the maximum extent practicable, any bus in Baltimore City or County funded or operated by the Maryland Transit Administration (MTA) – excluding Commuter Bus Routes – to allow passengers to embark and disembark at early voting centers within a half mile of a fixed route during the times the voting centers are open.

While MTA appreciates the intent of House Bill 656, there are numerous legal and operational challenges that would have to be overcome for implementation, including several concerns addressing the Americans with Disabilities Act (ADA). For instance, while the altered service is in operation, MTA’s MobilityLink paratransit service area could be required to be expanded to include a ¾-mile buffer beyond the deviated route, as opposed to the federally required ¾ mile buffer beyond the regular fixed-route, due to the route being diverted by up to ½ mile. In addition to route considerations, accommodations (such as a place to deploy a ramp, curbing, or sidewalks) may need to be made at the voting center stops in order to be ADA compliant.

Secondly, there is a potential impact on existing riders, bus operator work assignments, and overall system reliability. The deviations prescribed in the bill will impact any rider on that specific deviated segment, which in turn, will add to the rider’s overall travel time. Moreover, due to text stating MTA shall “allow passengers to embark/disembark,” it is unclear whether MTA would be required to deviate all trips from 8:00am to 8:00pm, or only upon request. This uncertainty could cause severe logistical issues that would negatively impact service reliability, as well as conflict with operator schedules and required break times.

Finally, the legislation as written does not exempt MTA’s Express Bus service from the requirement to deviate from its intended route. Currently, Express Bus routes operate with limited stops and are intended to be utilized for commuters traveling long distances. Deviating these Express Bus routes from their intended purpose would negate the shorter travel times from which Express Bus riders benefit.

The Maryland Department of Transportation respectfully requests that the committee consider this information when deliberating House Bill 656.

Respectfully submitted,

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