

Public Comments Report:

The Houston-Galveston Area Council conducted two rounds of public comment periods and public meetings for the consideration of requested project amendments to the 2045 Regional Transportation Plan and the 2021 Transportation Conformity document. The first public comment period in December 2020 with virtual public meetings held on December 3, 2020. The second public comment period was open between March 26, 2021 and April 28, 2021. Out of a total 141 comments submitted in both public comment periods 34 were duplicates and 107 were individual comments.

All the comments were made available to all interested parties for review online at <https://www.h-gac.com/regional-transportation-plan/submitted-public-comments..> H-GAC also posted the public comment letters received from various agencies and organizations. They were also forwarded to the sponsors for responding to the comments. All responses to the comments were developed in coordination and consultation with the project sponsors.

For each unique comment this report includes:

- Name of the commentor
- Organization
- Submission method
- Date comment submitted
- Comment and response

Along with the above-mentioned information this report also includes the public comments letter received from various agencies.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Robin Yates

Organization

Citizen

Submission Method

Online

Date Comment Submitted

03/28/2021

Comment

You need to step back, and look at the successful cities worldwide, and model them. If you look and listen, you will learn that your focus is off. You have one paragraph and only feigned attention given to what you call 'Active Transportation.' Until we invest heavily in and emphasize walking, biking, rolling as main means of transportation, we will continue this cascade of funding the self destruction of our species and planet. It is not safe to bicycle or ride a motorcycle in or around the Houston area. That needs to change. Thus plan only gives lip service to this need. Start over, folks.

Response

Thank you for your input. The 2045 RTP is made up of numerous plans including the Regional Active Transportation Plan, Regional Safety plan, Regional Coordinated Transportation Plan, Congestion Mitigation Air Quality Plan, to list a few. All these plans can be found in the appendix of the document. The direct link to the active transportation plan is (<http://2045rtp.com/documents/plan/Appendix-H-Regional-Active-Transportation-Plan.pdf>).

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Jacob Powell

Organization

Baytown City Council

Submission Method

Online

Date Comment Submitted

03/29/2021

Comment

I am happy to see the proposed addition of the I-10 San Jacinto River Bridge. It has been struck by a barge multiple times in recent years. Each of these instances has caused months of extended commutes for residents that live on the east side of the river. I strongly encourage H-GAC to make this bridge replacement a high priority. Thank you.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: TxDOT agrees that this bridge needs to be replaced. TxDOT is in the early phase of project development. TxDOT will work with the community and stakeholders including both the land and water side to identify design improvements that enhance mobility and improve safety for people and goods.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Stephen Livingston

Organization

ExxonMobil

Submission Method

Online

Date Comment Submitted

03/30/2021

Comment

I am one of thousand of Harris County residents that commute I-10 on the East side of town every day. The fact that one of the largest and busiest interstates in the nation has been ground to a halt on multiple occasions in the past few years because of an extremely inadequate bridge at the I-10 San Jacinto River crossing. This bridge should be replaced with an elevated bridge that has structural supports outside of the barge traffic lanes to prevent strikes, and the bridge should be expanded to resolve the DAILY bottleneck that occurs with SPUR-330. Cars sitting bumper to bumper instead of moving smoothly are an enormous problem in Harris County, and this is one of the worst locations on a daily basis.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: TxDOT agrees that this bridge needs to be replaced. TxDOT is in the early phase of project development. TxDOT will work with the community and stakeholders including both the land and water side to identify design improvements that enhance mobility and improve safety for people and goods.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Oscar S

Organization

Motorist

Submission Method

Online

Date Comment Submitted

04/05/2021

Comment

I support all the proposed highway additions to the 2045 mobility plan. The West Loop express lanes project is the most urgently needed among the new additions. Year after year, the West Loop ranks as the first or second most congested segment of freeway in Texas.

In terms of the overall 2045 project listing, I'm concerned about a highway segment which experiences heavy congestion but is not slated for any improvements: The North Loop 610 between US 290 and Interstate 45 north. There is congestion on this segment throughout the day and I have recently been in congestion going eastbound on a Sunday afternoon. When a highway is congested throughout the day and on weekends, it means there is inadequate capacity. This segment is the sixth most congested freeway in Texas, according to TTI. The antiquated interchange at IH-45 is a major contributor to the eastbound backups. This interchange is slated for improvement with the NNHIP, but with the future of the NNHIP uncertain, this section of the North Loop needs to be studied separately for improvements. Most likely the addition of one additional lane in each direction is the most suitable improvement, and that could probably be done with minimal or no new right of way.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: Thank you for your input.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Judi Becker

Organization

Myself

Submission Method

Online

Date Comment Submitted

04/07/2021

Comment

Hello, I recently moved to 17116 Harper's Trace in Conroe and the traffic on 242 and Harper's Trace is terrible. It took me 30 minutes to go the mile from Harper's Trace to I-45. There are several new subdivisions in this area along with schools, HEB and various other businesses that have opened. The two lanes going east and west cannot handle the flow of traffic especially with the construction going on further east that has many big rigs adding to the traffic.

One thing that could be done in the meantime is to have the traffic lights going longer as they are close together only allowing 1-2 cars to be able to enter onto 242.

Thank you for listening.

Response

Thank you for your input. Please see the response from TxDOT below.

TxDOT response: Thank you for your input. TxDOT is current developing schematic engineering and performing environmental clearance for SH 242 from I-45 to FM 1488. A virtual public meeting for this project is anticipated in fall 2021. In the meantime, we will have our Traffic Operations Section look into the signal timing along SH 242 to ease congestion.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Tecky Surawijaya

Organization

Harris County Resident

Submission Method

Online

Date Comment Submitted

04/07/2021

Comment

MPOID 18722: SH6 corridor improvement between Clay and I10W needs to consider adding protected bike lane and sidewalk to connect Bear Creek, George Bush, and Terry Hershey parks.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: Per FHWA and TxDOT guidance, all proposed projects are evaluated for sidewalk/bicycle accommodations.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Thomas Kim

Organization

Self

Submission Method

Online

Date Comment Submitted

04/08/2021

Comment

In general, I support the expansion of FM 2920 (#18510) from 4 lanes to 6 lanes. However, I believe that the continuous left turn lane that is currently present, needs to be changed. There should be medians and curb openings when needed. At present, there are no mechanisms to stop cross traffic from potentially causing an accident. A traffic signal at Foster Road and FM 2920 would also improve safety and allow for safer turning movements.

Response

Thank you for your input. Please see the response from TxDOT below.

TxDOT response: TxDOT currently has a funded safety and access management project that will include raised medians on FM 2920. A virtual public meeting for the safety improvements, including the raised median, was held online beginning April 27, 2021. You can find more information, here: <https://www.txdot.gov/inside-txdot/get-involved/about/hearings-meetings/houston/042721.html>. A public meeting for the FM 2920 widening project will be held in the Fall of 2021.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Jeffrey Wiley

Submission Method

Online

Organization

Greater Fort Bend Economic Development Council

Date Comment Submitted

04/08/2021

Comment

Thank you very much for the opportunity to comment. As the President and CEO of the Greater Fort Bend Economic Development Council, the 2045 Regional Transportation Plan is hugely important to the future planning of regional mobility, congestion mitigation, quality of life, safety and efficient movement of goods. We appreciate the effort.

Two projects we do not see on the list of projects in the 2045 RTP, which we believe should be included, relate to the continuation of an efficient and expanded transportation and freight route from Port Freeport to US 290. They involve a route from the Rosenberg/Needville/69 area in Fort Bend County to Interstate 10 in Waller County (36A Southern Route) and a continuing piece from Interstate 10 to US 290 (36A Northern Route) in Waller County.

These routes are necessary for enhanced evacuation capacity given State Highway 36 is a primary evacuation route for Southern Brazoria County and for efficient freight movement as a means of current and future need identified by HGAC in their freight mobility efforts to route traffic outside the metropolitan core.

TXDOT is currently underway with a 2 to 4 lane expansion from Port Freeport to Rosenberg. This route needs to continue in an efficient path to Interstate 10 and to US 290 to provide maximum benefit of evacuation safety and efficient freight mobility movement.

HGAC knows well that planning is the key to ensuring the most effective routes at the most reasonable costs to achieve their goals. Doing so before development occurs expands options and reduces cost. For this reason, we have particular concern that the Southern Route be incorporated this year at minimum. The pace of development in Fort Bend County poses great risk to the future location of such a route and threatens to increase cost, should they not be undertaken now. 36a Southern Route provides the key connection from Port Freeport and Brazoria County to Interstate 10 and provides enhanced evacuation, safety, freight mobility and commerce throughout the region.

We highly encourage the inclusion of both 36A Southern Route and 36A Northern Route into the plan with particular emphasis on the Southern Route to extend mobility effort along State Highway 36 already underway from Port Freeport to Interstate 10.

With the groundbreaking today of Port Freeport Harbor Channel Improvement Project, ensuring that Port Freeport will be the deepest Port on the Gulf Coast and throughout the region, we need to have foresight to ensure transportation mobility is there as the Port grows among other benefits delivered by the two projects.

Thank you for the opportunity to comment.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Michael Huffmaster

Organization

Blue Print Houston / Katy Prairie Conservancy

Submission Method

Online

Date Comment Submitted

04/08/2021

Comment

Please provide assessment criteria for route alternatives consideration (pertains to 35 and 36A), or perhaps a TxDOT link

Response

Thank you for your comment. Please see response from TxDOT below.

TxDOT response: While the specific evaluation criteria have not yet been established for the 36A study, these are the general steps and considerations in a feasibility study:

- * Assess the need for the project

- * Conduct feasibility analysis of the alternatives

- * Analyze the impact of the project on the:

- transportation system - changes in travel time, safety, and vehicle operating cost

- social and economic effects - impacts to the community including the human environment, civil rights, and environmental justice, economic impacts/development, etc.

- natural systems - including air/water quality, endangered species, wildlife, greenhouse gasses, archeological, energy, and cultural and historically significant locations and structures.

While much more goes into the process, our ultimate goal of the study is to describe the potential outcomes of a given alternative so that our regional leadership can make an informed investment decision for the benefit of the region to move people and goods.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Vernon Hegwood

Organization

Costello, Inc.

Submission Method

Online

Date Comment Submitted

04/08/2021

Comment

Thank you very much for the opportunity to comment. As a Harris County citizen, the 2045 Regional Transportation Plan is hugely important to the future planning of regional mobility, congestion mitigation, quality of life, safety and efficient movement of goods. We appreciate the effort.

I fully support the amendment to add 36A to the list of projects in the 2045 RTP. This route will provide an efficient and expanded transportation and freight route from Port Freeport to US 290. It involves a route from the Rosenberg/Needville/69 area in Fort Bend County to Interstate 10 (36A Southern Route) and a continuing piece from Interstate 10 to US 290 (36A Northern Route) in Waller County.

These routes are necessary for enhanced evacuation capacity given State Highway 36 is a primary evacuation route for Southern Brazoria County and for efficient freight movement as a means of current and future need identified by HGAC in their freight mobility efforts to route traffic outside the metropolitan core. Again, as a Harris County resident, providing a route that bypasses Houston would greatly improve local mobility as well.

I highly encourage the inclusion of both 36A Southern Route and 36A Northern Route into the plan with particular emphasis on the Southern Route to extend mobility effort along State Highway 36 already underway from Port Freeport to Interstate 10.

With the groundbreaking of Port Freeport Harbor Channel Improvement Project, ensuring that Port Freeport will be the deepest Port on the Gulf Coast and throughout the region, we need to have foresight to ensure transportation mobility is there as the Port grows among other benefits delivered by the two projects.

Thank you for the opportunity to comment.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Elizabeth Jensen

Organization

Referee PAC

Submission Method

Online

Date Comment Submitted

04/10/2021

Comment

When learning about each project being funded for widening a road or constructing a new one, I've not been able to find information on its expected capacity. What I'm looking for is a measure of expected capacity/cost, say at 5 and 10 years following project completion. Also, given this area's high fatality rate on the roads, I've been looking for projects that are focused on that particular issue (none are labeled as such).

Response

Thank you for your input. The 2045 RTP is made up of numerous plans including the Regional Active Transportation Plan, Regional Safety plan, Regional Coordinated Transportation Plan, Congestion Mitigation Air Quality Plan, to list a few. All these plans can be found in the appendix of the document. The direct link to the active transportation plan is (<http://2045rtp.com/documents/plan/Appendix-H-Regional-Active-Transportation-Plan.pdf>). We will take your comments into our consideration for the 2030 RTP development process.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Marc Anderson

Organization

none

Submission Method

Online

Date Comment Submitted

04/10/2021

Comment

For all road and transportation improvements, please use low glare lighting fixtures that are full cutoff that properly aim the light down and out of the eyes of drivers, pedestrians, and from going into the windows of homes/businesses. This will greatly help safety and allow lower wattage bulbs that will conserve energy. Use smart lighting that can automatically dim based on time of day or motion and conserve even more energy. Also please use low temperature lighting (2700-3000K) to avoid the adverse affects on the environment and people's melatonin levels while still maintaining a high CRI value for safety.

Response

Thank you for your input. Please see the response from TxDOT below.

TxDOT response: TxDOT's is continuously evaluating new tools, technologies, and techniques to improve safety. Thank you for your comment.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Alexsovan Hory

Submission Method

Online

Organization

High School Student

Date Comment Submitted

04/10/2021

Comment

2045. When we reach 2045, how do we want to picture ourselves moving around the Houston area? Our current strategy of actively accommodating only the car is simply unsustainable. We need to stop this car-dependent urban sprawl. Hurricane Harvey's impacts were worsened because we live in a concrete jungle. As a teenager, who only recently received his driver's license, I found it so difficult, dangerous, and inconvenient to go anywhere without a car. I'm sure parents want to see their kids become independent adults, but how can I and other kids become independent adults when we have to depend on our parents to take us everywhere because we can't drive. It is not only kids; senior citizens like grandparents are too scared to drive so they depend on their adult children to take them everywhere; the disabled are also neglected. For instance, how do you expect someone who is tied to a wheelchair or someone else who is impaired drive? By properly and actually putting plans into reality, we can embrace multi-modal transportation so everyone has the freedom of mobility. Everyone talks about the freedom the car brings but not many people talk about the freedom of NOT having to use a car. Even though I consider myself a car enthusiast, being interested in cars ever since I was five, I would much rather have the choice and the peace of mind of being able to walk, bike, use public transport, or other modes of transportation. What many don't know or seem to understand, when you provide alternate modes of transportation, you alleviate pressure on others. People who would rather use public transport or walk can do, and by doing that, traffic that must use the roadways such as commercial trucks have the room to do so. Economically, regions that are not car dependent have much more comprehensive and thriving economies. Look at New York, Tokyo, and London. They are all global cities, and what do they have all in common? Multi-modal transportation systems. They are walkable, bikeable, and public transport friendly. The backbone of the economy are small businesses. What small businesses need the most is foot traffic, but that is quite hard to attract when people are stuck in their car whizzing by to head to the nearest McDonald's. The car-dependent Houston area is heaven for these huge corporations since no matter where you go, there will be fast food. There will be these big box stores. When people think about food, they think about fast food here. I would love it if people thought about their local bakeries instead. Speaking of local, multi-modal transport is great socially. It encourages social interaction. As a teen without access to a car since I can't drive, I was stuck home in our car dependent suburbia. Every time I simply wanted to go to my friend's house who only lived five to ten minutes away by car, I've always felt stressed and worried for my safety since drivers are ruthless and our infrastructure and the way we design the places we live are all centered around the car. There is a reason why parents always drive their kids to school or other places because it really is dangerous to go anywhere without a car. With mental health being more important than ever, I felt frustrated and sad that I simply wanted to hang out with my friends to go eat, to go shopping, to be kids and have fun but since I had no car and can't drive anyway, I'm stuck at home. Also, we are experiencing an obesity epidemic. An environment where we can so easily go from our suburban home straight into our car, and pick up and eat fast food without ever getting out says a lot. People live busy lives and lots of time is spent commuting and being stuck in traffic staying in one place. There is little physical activity. No wonder why people have little time to exercise. When people of thinking of walking and biking, they usually think of it as recreational. Why not make it from point A to point B? Let people go from home to school, work outside of a car. I have a DREAM that one day I will be able to ride my bike together with my friends as our way of getting to and from school just like Dutch kids. Environmentally, we all know that climate change is real. We know that cars are contributing to this climate crisis. We all know the causes, effects and danger of air pollution, so why aren't we actively embracing the solutions? So what are the solutions? From the bottom up, this is what we need to do. We need to design our housing developments to be walkable, bikeable, and public transport friendly from the start. Currently, we are mass producing homes to accommodate for our population growth, but all of these new communities are completely car dependent suburbs; it will be hard to retrofit these communities into the multimodal dream that we dream of. We are currently mass producing car-dependent suburbs, so that means we can mass produce these homes the right way. Next, it is well known that highways wrecked American cities. Cutting through communities of color and creating blight. With the car and highways, people who could afford to leave the inner city and out into suburbs did. The people who did were typically white and this is where white flight came from. This left the poorer communities of color who were already disadvantaged to become even more disadvantaged. With new schools being built out in the suburbs, they were able to be financially supported through the influx of tax dollars and support of these new homes. With schools out in the suburbs where school quality is better, and education is power, no wonder why even in the 21st century that the inner cities tend to be communities of color and that the schools tend to be bad. Houston may be considered "diverse" but it is extremely racially segregated with the west being well off such as River Oaks and Memorial while the east such as the Third Ward and areas immediately east of Downtown tend to be the most deprived areas of the city. With no or the lack of or the dismal quality of schools, combined with less access to a car, the people in these areas are stuck in a toxic cycle with a difficult way out. My ideal plan is to create a transportation megahub of a city. Everywhere is walkable, cyclable, and have a huge bus network, tram network, mass rapid transit network, suburban rail network, regional rail network, intercity rail network, and finally a high speed rail network. Create a comprehensive, complex system where this is literally everywhere, connecting our region like never before. I feel we should complete the Grand Parkway loop and that is it when it comes to highway expansion. There is a phenomenon known for a LONG time called induced demand. The infamous Katy Freeway is the prime example of this. Taxpayers paid \$3 billion dollars for even worse traffic. The Katy Freeway is now 26 lanes across at its widest point and still has gridlock traffic even having traffic worse before the reconstruction. Commuting times increased. Coupled with extremely heavy housing developments in the Katy area, the short term benefits of the expansion drastically shortened and we're back to square

one. It is proven time and time again that we can not build our way out of traffic, so why are we still doing it? For instance, Interstate 45. It is proposed by TxDOT to expand I-45 North to even wider than it is now, but it seems like TxDOT did not learn their lessons that highway expansion does not solve anything, so why are we still pouring tons of taxpayer money into these unsustainable projects? TxDOT should not be so eager to go on a spending spree of highway construction because the T in transportation does not mean just cars. It means all modes of transportation including mass transit. Therefore, TxDOT should just shift all that money and into actually investing in solutions that actually work than those that don't. I propose that as the urban core of Houston, all of the highways inside I-610 should be removed. Many cities all around the world have experienced with freeway removal. And guess what? It actually caused traffic to be better while better connecting the communities within, drastically lowering air and noise pollution levels while beautifying the area. Look at San Francisco, with the earthquake in the 80s, the Embarcadero Freeway was removed since it was destroyed beyond repair; now the area is a vibrant, liveable place where people come spend quality time. Seoul's Cheonggyecheon was a freeway, now it is a exciting, lively place like a park and has become one of the city's most famous places. As I wrap things up, to learn more and see these examples in action, check out BicycleDutch, Not Just Bikes, and Streetfilms on YouTube; these are channels that show all the great infrastructure that can be possible. Specifically the first two focus on infrastructure in the Netherlands. My dream is to have infrastructure that rivals and best the ones found in the Netherlands such as biking infrastructure and Japan and its trains. I have a lot more that I want to say, but I will wrap it up here!

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Neal Ehardt

Organization

N/A

Submission Method

Email

Date Comment Submitted

04/09/2021

Comment

To the sponsor for each of the following projects: Does your project include sidewalks and protected bike lanes?

1. Hempstead Rd -- MPOIDs 18701, 18702, 18703, 18704, 18705, 18706
2. IH 10 E -- MPOID 18707
3. IH 10 W -- MPOIDs 18708, 18709
4. IH 610 E -- MPOID 18710
5. IH 610 S -- MPOIDs 18711, 18712
6. IH 610 W -- MPOID 18730
7. SH 288 -- MPOIDs 18713, 18714, 18715, 18716
8. SH 35 -- MPOIDs 309, 310, 18717, 18718, 18728
9. 36A South -- MPOID 18719
10. 36A North -- MPOID 18720
11. SH 6 -- MPOID 18721
12. SH 99 -- MPOIDs 18723, 18724, 18725, 18726
13. SL 8 -- MPOID 18727
14. IH 45 -- MPOID 16328

To H-GAC staff: What metrics did you use to select these projects for amendment? Are you prioritizing some projects that are unsafe by design for people walking and biking?

Response

Thank you for your comment.

These amendments were not selected through a project selection process. They are being considered for inclusion in the long-range plan at the request of the sponsor (TxDOT) for the determination of regional air quality conformity. H-GAC uses Call for Projects process on a regular basis tentatively once every three years to select the projects for programming in the Transportation Improvement Program (TIP), the 10-Year Plan, and inclusion in the Regional Transportation Plan (RTP). Last Call for Projects Process was conducted in conjunction with the development of 2045RTP. All projects submitted through the 2018 Call for Projects (2018 CFP) were evaluated based on 50% score (100 points) given to its benefit/cost ratio and 50% score (100 points) given to various planning factors. The benefit-cost analyses were focused on reduction of crashes, delay and emissions. Please refer to 2045 RTP Appendix P for more details about "Call for projects evaluation criteria". Thank you again for your participation and comment.

Please see the response from TxDOT below.

TxDOT response: Per FHWA and TxDOT guidance, all improvement projects must consider bicycle and pedestrian accommodations. Sidewalks and bike lanes are not applicable for highway mainlane widening of a controlled access facility.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Nick Garner

Organization

N/A

Submission Method

Email

Date Comment Submitted

04/04/2021

Comment

Hello,

I am writing to let you know that is absolutely imperative to include the I-10 Bridge project in the 2045 Regional Transportation Plan.

As you most certainly know, this bridge is artery that connects thousands of people from home to work and vice versa, and when it is closed indefinitely it becomes a massive issue. It is NOT just a simple inconvenience. THOUSANDS of people added at least an hour per day to their commute because to the detours and additional traffic that other roads incurred.

This HAS to be number 1 on the 2045 Plan!

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: San Jacinto Bridge

TxDOT agrees that this bridge needs to be replaced. TxDOT is in the early phase of project development. TxDOT will work with the community and stakeholders including both the land and water side to identify design improvements that enhance mobility and improve safety for people and goods.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Heather Betancourth

Organization

N/A

Submission Method

Email

Date Comment Submitted

04/04/2021

Comment

On the Regional Transportation Plan and Conformity Updates Public Meetings:

I am writing in support of project included in the 2045 Regional Transportation Plan to widen and reinforce the San Jacinto River bridge on Interstate 10. As a Baytown resident, worker, and City Council member I cannot stress enough how important funding this project is sooner rather than later. I-10 is a national transportation route that severely breaks down when the San Jacinto River bridge is compromised. Delays in commerce are common when this route down, as well as the ability for workforce to get to major industrial complexes. ExxonMobil and Chevron Phillips both have their largest domestic manufacturing plants in Baytown and many of their essential personnel commute from Houston. When the San Jacinto Bridge is not passable it greatly affects people's ability to get to work, affecting petrochemical manufacturing which, again, has a national ripple effect. Please consider not only funding this project, but do so now.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: San Jacinto Bridge

TxDOT agrees that this bridge needs to be replaced. TxDOT is in the early phase of project development. TxDOT will work with the community and stakeholders including both the land and water side to identify design improvements that enhance mobility and improve safety for people and goods.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Andrew Bohac

Submission Method

Online

Organization

City of Needville

Date Comment Submitted

04/15/2021

Comment

As an advocate for the development of regional transportation infrastructure from the Brazosport area to Hempstead and beyond, I fully support the amendment to add 36A to the list of projects in the 2045 Regional Transportation Plan. This route will provide an efficient and expanded transportation and freight route from Port Freeport to US 290. It involves a route from the Rosenberg/Needville/V69 area in Fort Bend County to Interstate 10 (36A Southern Route) and a continuing piece from Interstate 10 to US 290 (36A Northern Route) in Waller County.

These routes are necessary for enhanced evacuation capacity given State Highway 36 is a primary evacuation route for Southern Brazoria County and for efficient freight movement as a means of current and future need identified by H-GAC in their freight mobility efforts to route traffic outside the metropolitan core. With the groundbreaking of Port Freeport Harbor Channel Improvement Project, ensuring that Port Freeport will be the deepest Port on the Gulf Coast and throughout the region, we need to have foresight to ensure transportation mobility is there as the Port grows, among other benefits delivered by the two projects.

The 2045 Regional Transportation Plan is hugely important to the future planning of regional mobility, congestion mitigation, quality of life, safety, and efficient movement of goods. We appreciate the effort. TxDOT is currently underway with a 2 to 4 lane expansion from Port Freeport to Rosenberg. This route needs to continue in an efficient path to Interstate 10 and to US 290 to provide maximum benefit of evacuation safety and efficient freight mobility movement.

H-GAC knows well that planning is the key to ensuring the most effective routes at the most reasonable costs to achieve their goals. Doing so before development occurs expands options and reduces cost. For this reason, I have particular concern that the Southern Route be incorporated this year at minimum. The pace of development in Fort Bend County poses great risk to the future location of such a route and threatens to increase cost, should they not be undertaken now. 36A Southern Route provides the key connection from Port Freeport and Brazoria County to Interstate 10 and provides enhanced evacuation, safety, freight mobility and commerce throughout the region.

Needville's location at the southern end of the potential 36A route is critical to our mobility requirements in the near future. We are seeing tremendous residential and commercial growth coming over the next 10 years and the need for efficient transportation from the port through our community is of critical importance.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Alan Steinberg

Organization

West Houston Association

Submission Method

Online

Date Comment Submitted

04/19/2021

Comment

The West Houston Association and our Regional Mobility Committee supports the amendment to add 36A to the list of projects in the 2045 Regional Transportation Plan. This has been proposed to involve a route from the Rosenberg/Needville/V69 area in Fort Bend County to Interstate 10 (36A Southern Route) and a continuing piece from Interstate 10 to US 290 (36A Northern Route) in Waller County.

The 2045 Regional Transportation Plan is an important tool for guiding the careful planning and analysis of projects related to regional mobility, congestion mitigation, quality of life, safety, and efficient movement of goods. Planning for this project needs to be inclusive of options for connectivity to Interstate 10 and to US 290 to provide thoughtfully contemplate benefits related to general mobility, economic development, environmental preservation, evacuation safety, and efficient freight mobility movement. Including this project in the RTP will allow for continued regional conversation on potential alignments for this project and will facilitate environmental reviews in a manner which is most appropriate to address and mitigate any potential project impacts while maximizing project benefits.

Thank you for this opportunity to comment.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Claire Wrigley

Organization

None

Submission Method

Online

Date Comment Submitted

04/20/2021

Comment

I am a resident of Cottage Grove and have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

I oppose all options TxDOT has presented, and I encourage H-GAC to not accept the addition of the TxDOT I-10 Inner Katy Managed Lanes project to the 2045 Regional Transportation Plan. TxDOT should reconsider the scale of this project and look at alternatives that will have less impact on the neighborhood.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Angela Kao

Organization

Self

Submission Method

Online

Date Comment Submitted

04/20/2021

Comment

I am a resident of Cottage Grove and have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

I oppose all options TxDOT has presented, and I encourage H-GAC to not accept the addition of the TxDOT I-10 Inner Katy Managed Lanes project to the 2045 Regional Transportation Plan. TxDOT should reconsider the scale of this project and look at alternatives that will have less impact on the neighborhood.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Ryan Smith

Organization

Self

Submission Method

Online

Date Comment Submitted

04/20/2021

Comment

I am a resident of Cottage Grove and have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

I oppose all options TxDOT has presented, and I encourage H-GAC to not accept the addition of the TxDOT I-10 Inner Katy Managed Lanes project to the 2045 Regional Transportation Plan. TxDOT should reconsider the scale of this project and look at alternatives that will have less impact on the neighborhood.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Ashley Chabaud

Organization

N/A - Cottage Grove resident

Submission Method

Online

Date Comment Submitted

04/20/2021

Comment

I am a resident of Cottage Grove and have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

I oppose all options TxDOT has presented, and I encourage H-GAC to not accept the addition of the TxDOT I-10 Inner Katy Managed Lanes project to the 2045 Regional Transportation Plan. TxDOT should reconsider the scale of this project and look at alternatives that will have less impact on the neighborhood.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Rebecca Esser-Stuart

Organization

Citizen

Submission Method

Online

Date Comment Submitted

04/20/2021

Comment

Dear H-GAC – Transportation Planning,

I am a resident of Cottage Grove and have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials, I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

Concept A appears to threaten homes along the feeder and our only green space, Cottage Grove Park. Concept B brings the noise and pollution of I-10 upwards on elevated freeway decks and projects it across our neighborhood.

Concept C does both – elevating the freeway lanes and then bringing them immediately adjacent to our homes and park.

I oppose all options. H-GAC should reconsider their support of this project and look at alternatives that will have less impact on the neighborhood.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Henry Smith

Organization

Resident in Cottage Grove

Submission Method

Online

Date Comment Submitted

04/20/2021

Comment

As a resident of Cottage Grove I recently heard about the I-10 Inner Katy Managed lanes project. After reviewing the project materials, I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood. Currently not in favor of any of these proposed solutions.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Robert Burke

Organization

Cottage Grove Civic Association

Submission Method

Online

Date Comment Submitted

04/21/2021

Comment

Dear H-GAC – Transportation Planning,

I am a resident of Cottage Grove and have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials, I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

Concept A appears to threaten homes along the feeder and our only green space, Cottage Grove Park. Concept B brings the noise and pollution of I-10 upwards on elevated freeway decks and projects it across our neighborhood.

Concept C does both – elevating the freeway lanes and then bringing them immediately adjacent to our homes and park.

I oppose all options. H-GAC should reconsider their support of this project and look at alternatives that will have less impact on the neighborhood.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Veronica Davis and David Fields

Organization

City of Houston

Submission Method

Email

Date Comment Submitted

04/16/2021

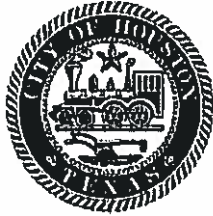
Comment

Attached is a letter with the comments from the City of Houston on the 2045 Regional Transportation Plan amendments. Our comments are limited to the amendments within the City of Houston boundaries. Overall, our major concern is the regional elevated lanes have not be vetted by the public, reviewed or approved by the H-GAC TPC, nor contemplated in the 2045 Regional Transportation Plan. Our ask is for a regional study conducted by H-GAC that evaluates is the Regional Express Access Lanes are consistent with the vision for the region and includes a public vetting process.

[View Attached Letter](#)

Response

A response from TxDOT is attached



CITY OF HOUSTON

Sylvester Turner

Mayor

P.O. Box 1562
Houston, Texas 77251-1562

Telephone – Dial 311
www.houstontx.gov

April 16, 2021

Craig Raborn, Transportation Director
Houston-Galveston Area Council
3555 Timmons Ln. Ste 120
Houston, TX 77027

On behalf of the City of Houston, we submit these comments related to the two virtual public meetings held by the Houston-Galveston Area Council (H-GAC) on Thursday, April 8, 2021 to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). Staff of the two departments we lead, Houston Public Works and the Planning & Development Department, work in unison to evaluate and develop mobility betterments for the City of Houston. Our departments are actively engaged with H-GAC in development of the region's long-range transportation plan and are committed to working with regional partners, including H-GAC and TxDOT, in the federally required continuing, cooperative, and comprehensive planning process.

Several of the proposed RTP amendments are major highway infrastructure investments in the City of Houston along densely developed residential and commercial corridors. City officials have strong concerns about the proposed scope and schedules of these proposed additions to the region's long-range (20 year) transportation plan. The amendments propose construction initiation by 2030 which is within the region's 10-year program of Transportation Improvement Program (TIP) projects to be funded for construction rather than the long-range planning horizon. Most concerning, cooperative planning was started in the latter half of 2020 focused on design details rather than evaluation of corridor mobility needs and improvement alternatives.

The Federal Highway Administration (FHWA) Transportation Planning Process Briefing Book states the following in its Introduction.

"Transportation at its core is about mobility and access. Patterns of growth and activity for people and goods across America are fundamentally driven by how well the transportation system delivers mobility and access. The performance of the transportation system also affects public policy concerns, such as safety, air quality, environmental resource consumption, social equity, resilience, land use, urban growth, economic development, and security. Transportation planning recognizes the critical links between transportation needs and other societal goals."

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments within the City of Houston will bypass the Planning and Environment Linkages (PEL) process which is intended by Congress and FHWA to accelerate project delivery with early cooperative and comprehensive planning. According to the FHWA webpage, "Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that 1) considers

Council Members: Amy Peck Tarsha Jackson Abbie Kamin Carolyn Evans-Shabazz Dave Martin Tiffany D. Thomas Greg Travis Karla Cisneros
Robert Gallegos Edward Pollard Martha Castex-Tatum Mike Knox David W. Robinson Michael Kubosh Lelitia Plummer Sallie Alcorn
Controller: Chris Brown

environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analysis, and products developed during planning to inform the environmental review process.”

City officials believe that a thorough analysis of transportation demand, travel patterns, and environmental impacts is warranted given recent telework experience and technological advances changing how people and goods will move. Data from these analyses could impact the need and purpose for each project. They should be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated. In addition, relevant City efforts including Houston’s Climate Action Plan goal to “Reduce Vehicle Miles Travelled per capita 20% by 2050”, should be incorporated into the purpose of all projects within the city’s limits.

Below are project-specific comments on proposed RTP amendments within City of Houston limits.

Hempstead Road

Proposed Amendment: Reconstruct Hempstead Road and add one transit lane in each direction at grade and construct 4 elevated managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Elevated lanes have not been coordinated.
- Significant work funded by the metropolitan planning organization has focused on development of commuter rail in the Hempstead corridor. This does not appear to have been considered or recommended.
 - The H-GAC High Capacity Transit Framework approved by TPC states, “Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways.”

IH 10W from IH 610W to IH 45

Proposed Amendment: Reconstruct 10 mainlanes and two 2-lane frontage roads and construct 4 new non-toll managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Result of METRO’s Inner Katy Bus Rapid Transit (BRT) service to accommodate additional travel demand should be recognized before consideration of additional capacity.

IH 610W from IH 10W to IH 69S

Proposed Amendment. Construct 4 express lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Previously canceled due to significant public opposition.

IH 10W Studemont to Houston Ave.

Proposed Amendment: Reconstruct to raise the existing 10 mainlanes out of the White Oak Bayou floodway, for reconstructing 2 lane CBD connectors to 4 managed lanes.

- Maintain METRO Inner Katy Bus Rapid Transit (BRT) dedicated access to downtown.
- Removal of structures from the floodway consistent with Resilient Houston goals.

SH 35 from Dixie Drive to Brazoria County Line

Proposed Amendment: Construct new 6 lane freeway with 2 new 2-lane frontage roads.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.

- Significant work funded by the metropolitan planning organization has focused on development of commuter rail in the SH 35 corridor. This does not appear to have been considered or recommended.
 - The H-GAC High Capacity Transit Framework approved by TPC states, "Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways."
- Limit footprint to within Mykawa Road right of way to minimize impacts on residents.

IH 610E at Ship Channel

Proposed Amendment: Reconstruct and raise Ship Channel bridge.

- Consistent with Resilient Houston goals.

SH 6 from Clay Road to IH 10W

Proposed Amendment: Feasibility Study

- The City of Houston looks forward to early and continuing cooperative and comprehensive participation in the study.

Conclusion

The City of Houston has committed to several mobility-related actions as part of an ongoing effort to improve citywide resilience. Among them are the following elements City officials will work with regional partners to incorporate into project planning and development.

- Engage Houstonians in the design of mobility infrastructure. As regional partners make significant investments in increased mobility options in the coming years, it is imperative that Houstonians who will be impacted most have a voice in the planning process. The City will work with regional partners to form and facilitate a collective community engagement framework that consists of shared principles, coordinated processes, common tactics, and measurable outcomes for infrastructure projects within the city.
- Target transportation demand management (TDM) programs to reduce single-occupancy-vehicle travel and better manage demand on our transportation network.
- Upgrade Houston's highway network with two-way HOV and HOT lanes. Expanding two-way high-occupancy vehicle (HOV) and high-occupancy toll (HOT) lanes will encourage more Houstonians to choose sustainable transportation choices when commuting to regional job centers, while requiring less space per traveler than Single Occupancy Vehicle (SOV) lanes.
- Consistent with local standards, effectively manage water drainage on and from I-10 as well as holding water before entering the storm sewer system.

The combined Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes proposed as amendments to the 2045 RTP with 2026-2030 construction dates seem to indicate an intent to construct core elements of a regional elevated express lane system. Initiation of federal environmental review for the Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes seems premature given that a network of interconnected elevated express lanes remains a planning-level concept. The vision of a regional elevated express lane network has not been vetted with the public, reviewed or approved by the H-GAC Transportation Policy Council, nor contemplated in the 2045 Regional Transportation Plan adopted by the agency responsible for regional transportation planning less than two years ago in May 2019. The City of Houston respectfully requests that H-GAC conduct a study, including public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP.

The 2045 RTP states that, "H-GAC's mission is to plan for the orderly growth and development of the region, working in concert with multiple planning partners. This mission involves building region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity." City of Houston officials are committed to continuing work with H-GAC and regional

partners to build region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy and fostering equity through a continuing, cooperative and comprehensive planning process.

Thank you for the opportunity to provide comments on the proposed amendments to the 2045 RTP.

Sincerely,

DocuSigned by:
Veronica O. Davis
32CFF201328048D

Veronica O. Davis, PE
Director
Transportation & Drainage Operations

DocuSigned by:
David Fields
7FB57C03F045459

David Fields, AICP
Chief Transportation Planner
Planning & Development Department



P.O.BOX 1386, HOUSTON, TEXAS 77251-1386 | 713.802.5000 | WWW.TXDOT.GOV

June 14, 2021

Mr. Craig Raborn, AICP
Director, Transportation Planning
Houston-Galveston Area Council (H-GAC)
3555 Timmons Lane, Suite 120
Houston, Texas 77027

RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan (RTP)

Dear Mr. Raborn:

This letter is in response to the City of Houston's (COH) April 16, 2021, correspondence regarding comments on the Houston-Galveston Area Council's (H-GAC) 2045 Regional Transportation Plan (RTP) Amendments. The Texas Department of Transportation (TXDOT) will address the COH comments regarding TXDOT's project development process and then we will address the specific projects identified in the COH letter.

TXDOT has a long-standing history of providing a robust and equitable transportation system that has served as the State's transportation backbone providing critical access to opportunities and facilitating job creation and economic prosperity. The system is extremely efficient. The State system represents 26 percent of the public roads in Texas and, yet, it carries 72 percent of the vehicle miles traveled.

The Houston Region is a microcosm of the State. As the fourth largest City in the nation, Houston and the surrounding region can credit the historical collaboration and cooperation of regional leadership for having had the vision to make the tough decisions and investments needed to bring us to today's regional transportation network. The TXDOT Houston District has not wavered from its commitment to this collaboration and cooperation, but we do not serve one constituency more ardently than any other. Our primary concern is safely moving people and goods in the entire region and beyond.

The TXDOT Houston District strives for excellence on every project and to serve equally the nearly seven (7) million regional residents – from those in the dense, urban core of Harris County to those in rural areas of Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, and Waller Counties. We are especially concerned about those that are most vulnerable.

To accomplish TXDOT's mission, we use some of the most rigorous industry methods to develop our portfolio of projects and to move those projects through project development toward implementation. To that end, the Planning and Environmental Linkage (PEL) Study process, as suggested by the COH, is not the appropriate process to use on most projects. The PEL process is designed to accelerate project delivery by integrating the planning and environmental process with implementation occurring, generally, within five (5) years. While TXDOT is certainly able to perform PEL studies, financial resources cannot keep pace with the potential portfolio of construction projects that would result from the PEL process. In other words, the PEL is not a tool to determine whether a project should be in the RTP, it's a tool for accelerated implementation.

OUR VALUES: *People • Accountability • Trust • Honesty*

OUR MISSION: *Connecting You With Texas*

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There are, however, many scientific methods TXDOT uses and studies performed to make decisions about the need for investment and to determine the types of improvements that are required to meet public needs. Our improvements follow industry-standard, federal, and state guidelines for engineering analysis and always consider environmental impacts. Whatever study method is employed, every project goes through the National Environmental Policy Act (NEPA) clearance process and TXDOT's major projects also go through stakeholder engagement and the public involvement process.

TXDOT's stakeholder and public engagement process is second to none in the Houston region. No other local government or transportation agency goes through the extensive and rigorous project level public involvement that TXDOT does. In fact, other agencies should be held to the same high standard. TXDOT's level of engagement is appropriate given the diversity of use and volume of vehicles we accommodate within the region including Single Occupied Vehicles (SOV), carpools, vanpools, buses, and freight haulers. TXDOT is not focused on one mode choice over the other. That is not our mission. TXDOT moves people and goods across a ground transportation system in whatever mode choice the user decides is appropriate.

With that said, TXDOT does want to move people as efficiently and cleanly as possible across our system. We need to reduce emissions and the COH's Climate Action Plan is a great start. TXDOT has invested in projects that help users do just that. One example is our Houston ConnectSmart project, which seeks to level out the Bell Curve of congestion over time, space, and ultimately mode in the eight (8) county region. TXDOT wants to make Houston more connected and less congested. By providing users with better information and personalized travel options such as carpool, vanpool, and bus options, and rewarding them for their congestion-relieving decisions, we believe users are empowered to help TXDOT achieve our Vision Zero goal and, ultimately, will reduce vehicle miles traveled and improve our region's air quality. We appreciate the COH working with us on this important investment in a cleaner and more environmentally friendly technology enhancement for mobility in the region. These choices will be made by users while riding on some of the safest and most comfortable facilities in the region. Cleaner air and improved safety require a comprehensive approach of engineering and technology solutions to get TXDOT where we want to be with respect to safety and climate. We are committed.

The Regional Express Access Lanes (REAL) concept is a response to the work performed by H-GAC's High Capacity Transit Task Force (HCTTF) in 2019, which developed a recommended network of high capacity transit facilities that largely proposed following the State system. The transit recommendations from this effort included multiple Bus Rapid Transit (BRT), Light Rail, and Commuter Rail lines. The task force's recommendation, developed over seven (7) task force meetings, were subsequently integrated into the 2045 RTP. No full suite of alternatives, qualitative or quantitative process involving data collection and analyses, universe of alternatives, or thorough process for community engagement was performed prior to including these impactful and potentially disrupting technologies into the 2045 RTP, other than the federally required, standard public meeting process for the long-range plan document.

The HCTTF recommendations, and the subsequent inclusion of those recommendations in the 2045 RTP, spurred TxDOT's interest in better understanding how these transit recommendations would impact the State system. The REAL Plan is a proposed comprehensive and forward-looking plan that seeks to understand how the State system can maximize the movement of people and goods in a highly efficient and agile manner. We are in Phase 1 of The REAL Plan, which includes coming together with our regional transportation partners to make data-driven decisions that are both quantitative and qualitative at a high level that preserves options for the future.

While the State system does support most vehicle miles traveled, the State system does not operate alone. The Region's ground transportation system functions as a hierarchy. Local streets feed into collectors, collectors feed into arterials and so on to reach interstate level. A user cannot get from one place to another without using this multi-tiered transportation network governed by multiple jurisdictions. TxDOT believes it is essential to develop a shared REAL vision with our transportation partners before introducing the concept to the public. To do anything else would compromise the cooperative process between the transportation partners and their respective transportation networks.

Phase 1 of The REAL Plan is the start of a conversation that TxDOT hopes will still be discussed 20 years from now as the REAL Plan goes from concept to phased implementation as needs, resources, and new technologies are identified. In Phase 2 we hope that H-GAC, along with transportation partners commitment toward a shared vision for the future of transportation in the Region, will take The REAL Plan to the next step to bring it to the public and ultimately formalize the REAL Plan vision into the Region's long-range plan. TxDOT's roadway system is one part of the REAL Plan vision, albeit a critical part since the State's system serves as the transportation backbone for moving people and goods throughout the region and beyond.

Furthermore, TxDOT has no preconceived ideas of a REAL Plan network being a series of "interconnected elevated express lanes". Each corridor requires an independent and deeper data-driven analysis that includes the REAL Plan framework and goals, collectively agreed upon by regional transportation partners, to ensure an integrated system that provides equitable services from the first mile to the last mile of a person's trip. This independent, corridor level study will collect the specific data and land use information required to determine the needs within that specific corridor. These corridor level studies will include extensive stakeholder engagement and public involvement. That is our process.

Some of these major studies being proposed by TxDOT in the 2045 RTP Amendment may utilize concepts from the REAL Plan vision that is, admittedly, still in Phase 1. However, each of these corridor studies can function independently – absent a REAL Plan vision – because they are being evaluated based on corridor-specific data and needs augmented with public and stakeholder input. The REAL Plan vision does propose an integrated transportation network that is accessed through mobility hubs. Any recommended corridor improvements today should be agile enough to meet a REAL Plan future.

In summary, TxDOT recommends that the Transportation Policy Council (TPC) approve the 2045 RTP Amendments as submitted. This will enable us to work cooperatively and collaboratively to plan for the orderly growth and development of the ground transportation system and to foster increased economic vitality and enhanced access to opportunities through more efficient movement of people and goods in the 8-county region and beyond.

TXDOT is unwavering in its commitment to provide high-quality, safe multimodal transportation that is accessible to everyone in the region and beyond. Our facilities are not limited to the SOV. Any ground transportation mode can access our facilities, subject to appropriate laws. Furthermore, the High Occupancy Vehicle (HOV) lanes incentivize sharing a ride by offering enhanced reliability and managed lanes penalize the SOV by charging a fee for use; although, most are not operated by TXDOT even though they are on the State system.

TXDOT does not believe it's in the Region's best interest to cause congestion by limiting or reducing capacity improvements to the State system to spur behavior change toward higher occupancy commuting and transit ridership. The improvements we provide are not only for capacity, our improvements increase safety and enhance the driving experience by creating a facility that operates more comfortably for all modes. H-GAC's long-range plan indicates the Region's population will swell to nearly 11 million by 2045. It will take all of us working together to provide an integrated and robust ground transportation system that provides users options, so they can decide which mode meets their needs.

TXDOT would like to address the specific project concerns outlined in the COH's letter.

Hempstead Road

Hempstead Road from I-610 to BW 8 currently exists as a project in the 2045 RTP. This project will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder engagement and public involvement. As discussed earlier, we have been inspired by the work of the HCTTF and believe REAL Plan concepts are appropriate to explore in this corridor given its proximity and connection to the proposed high-speed rail project, the Galleria BRT, Northwest Transit Center, and a potential connection to the Inner Katy Corridor and the central business district. TXDOT looks forward to working with all the stakeholders and the public to potentially refine the scope of this important project. All potential scope changes will reflect new technologies and use appropriate, available data.

I-10 west from I-610 west to I-45 and I-10 west from Studemont to Houston Avenue: The Inner Katy Corridor Project

TXDOT is keenly aware of the time sensitivity of the Inner Katy BRT project. The BRT project was the top-ranking project during the 2018 H-GAC Call for Projects and currently is programmed in the H-GAC 2021–2024 Transportation Improvement Program (TIP) scheduled to let to construction in January 2023. TXDOT will do everything possible to help the Metropolitan Transit Authority of Harris County (METRO) stay on this implementation timeframe.

The I-10 west (Inner Katy) corridor is a high-volume facility in terms of passenger and freight movement with limited right of way (ROW) for future improvements. This section of roadway carries nearly 275,000 vehicles per day including SOV, carpools, vanpools, and buses. Nearly 8 percent of the corridor's traffic is freight. METRO's Inner Katy BRT project will impact the State's ROW and the interstate facility. The identification of existing and future transportation needs for the movement of people and goods within the I-10 Inner Katy corridor is paramount to ensure TXDOT can adequately respond to METRO's inclusion of the proposed Inner Katy BRT currently programmed for construction in the H-GAC's TIP.

In summation, TXDOT must better understand the physical space ramifications and other impacts these proposed improvements will have on the I-10 Inner Katy Corridor. The I-10 Inner Katy Corridor Study is a direct response to the Inner Katy BRT implementation project. Otherwise, we would be evaluating METRO's Inner Katy BRT project without the necessary information to make sound engineering decisions about the future of the corridor. To TXDOT's knowledge, the METRO Inner Katy BRT project does not have enough project level environmental or engineering detail to determine impacts to the human environment, our facility, or the surrounding natural and built environment. Because of the lack of basic project level information on these projects and the certain impact to our facility, TXDOT initiated the I-10 Inner Katy Study so that we could collaboratively develop a shared vision for the future of I-10 Inner Katy Corridor.

TXDOT acknowledges that in the days following the federal disaster declaration related to the COVID-19 pandemic, traffic volumes dropped substantially and remained low in the following months. This is supported by the Regional Travel Impacts of COVID-19 report prepared by H-GAC and presented at the May 21, 2021, TPC meeting. The report indicated that "while traffic volumes initially dropped, the volumes rebounded and as of September 4, 2020, the Friday of Labor Day weekend, that travel volumes were equal to or greater than the baseline volume." The report goes on to say that travel volumes have hovered at approximately 80 percent of the pre-COVID volumes. TXDOT's own data shows that traffic volumes are at or near pre-COVID volumes.

The Governor has declared the State open and businesses are returning to normal. TXDOT anticipates higher traffic volumes as many individuals may shift from transit to SOV for personal health reasons. In addition, traffic patterns may have changed. For instance, there may be fewer people traveling from home to work during peak periods and more people may be running errands during the day. The volumes have rebounded; therefore, telecommuting does not seem to have had a significant impact on the State's transportation system. We do suggest that H-GAC and/or METRO perform a new traffic analysis to reflect the effects of the COVID-19 pandemic and the resultant telecommuting/changes in travel patterns on transit ridership because the traditional morning/evening peak travel demand may have been impacted and thus, may impact current and proposed bus operations. This will ensure that investments being made to develop and implement these very impactful transit services will be using the latest post-pandemic assumptions and data.

TXDOT is committed to supporting the development and implementation of the proposed METRO Inner Katy BRT project. To date, TXDOT and METRO have worked collaboratively and cooperatively to identify and share information for the benefit of the traveling public. We have successfully delivered a joint Virtual Public Meeting event for the Inner Katy Corridor that showcased the METRO Inner Katy BRT project while also soliciting input concerning the existing and future transportation needs of the broader corridor. It is the identification of the needs and the discussion of potential solutions for which TXDOT is currently seeking an amendment to the 2045 RTP. Including the Inner Katy Corridor Study in the H-GAC long-range plan is the start of a conversation about the future of this vital corridor. We would not want the implementation schedule for METRO's Inner Katy Project to be adversely impacted if, as requested by METRO, TXDOT's Inner Katy Project is not included in the 2045 RTP. Without inclusion of TXDOT's Inner Katy Project in the RTP, TXDOT will not be able to make sound engineering decisions about the future development of the corridor.

I-610 west from I-10 west to I-69 south

Inclusion of the proposed project within the RTP would allow for the Regional Air Conformity model to be run with the proposed project included. The conformity model runs scenarios that allocate transportation demand to available links coded in the model network. These links can then be analyzed, and the data extrapolated to refine the traffic analysis for the proposed project. Without the project added into the RTP, the proposed project's impact on air quality and mobility cannot be properly examined.

Managed lane is a term used to describe transportation facilities where access to the facility is managed through defined ingress and egress points, through prohibition of certain vehicles or modes, through time of day use, or through value pricing. Examples of managed lanes are HOV lanes, Express lanes, or High Occupancy Toll (HOT) lanes.

TXDOT conducted a public meeting to gather feedback on the proposed project in 2015 where positive comments were received due to the project's potential to alleviate congestion along I-610.

SH 35 from Dixie Drive to Brazoria County Line

Improvements to SH 35 from Dixie Drive and continuing south past the Brazoria County(County) line to future SH 99 are needed to provide a critical connection for communities in the southern part of TXDOT Houston District's service area. As stated previously, we do not believe telecommuting to be a large factor in traffic volumes and we do not see where "significant work" has been performed in the corridor to determine that the focus of development for this corridor should be commuter rail. Furthermore, TXDOT would not be the implementing agency for commuter rail. Commuter rail planning, design, and implementation would be performed by others.

Our process for corridor studies involves both a quantitative and qualitative process that features extensive stakeholder and public engagement and input before finalizing a proposed improvement concept. TXDOT believes including the project in the 2045 RTP puts the public on notice that we intend to study the corridor because this corridor is vital to the transportation system for the cities south of Houston. Improvements are anticipated to move people and good more reliably.

Conclusion

TXDOT is unwavering in its commitment to continually work with regional transportation partners and the nearly 7 million constituents in the Houston-Galveston-Brazoria-Woodlands-Conroe Transportation Management Area to ensure they all have a voice in the State planning process. This continuous cooperation and collaboration are fundamental to achieving the region's mission of improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity.

In addition to this letter, we have provided specific responses to public comments as part of H-GAC's Response Matrix for the 2045 RTP Amendments. Thank you for the opportunity to respond. Should you have any questions please contact my office at (713) 802-5001 or via email at eliza.paul@txdot.gov.

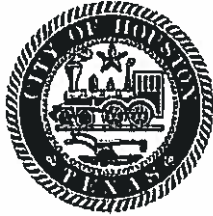
Sincerely,



Eliza C. Paul P.E.
District Engineer
Houston District

Attachment

CC: James W. Koch, P.E., Director, Transportation Planning and Development,
Houston District, TXDOT
Andrew C. Mao, P. E., Director, Advanced Transportation Planning, Houston District, TXDOT
Vishu Lingala, H-GAC
Veronica O. Davis, P.E., Director, Transportation and Drainage Operations, COH
David Fields, AICP, Chief Transportation Planner, Planning and Development Department, COH



CITY OF HOUSTON

Sylvester Turner

Mayor

P.O. Box 1562
Houston, Texas 77251-1562

Telephone – Dial 311
www.houstontx.gov

April 16, 2021

Craig Raborn, Transportation Director
Houston-Galveston Area Council
3555 Timmons Ln. Ste 120
Houston, TX 77027

On behalf of the City of Houston, we submit these comments related to the two virtual public meetings held by the Houston-Galveston Area Council (H-GAC) on Thursday, April 8, 2021 to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). Staff of the two departments we lead, Houston Public Works and the Planning & Development Department, work in unison to evaluate and develop mobility betterments for the City of Houston. Our departments are actively engaged with H-GAC in development of the region's long-range transportation plan and are committed to working with regional partners, including H-GAC and TxDOT, in the federally required continuing, cooperative, and comprehensive planning process.

Several of the proposed RTP amendments are major highway infrastructure investments in the City of Houston along densely developed residential and commercial corridors. City officials have strong concerns about the proposed scope and schedules of these proposed additions to the region's long-range (20 year) transportation plan. The amendments propose construction initiation by 2030 which is within the region's 10-year program of Transportation Improvement Program (TIP) projects to be funded for construction rather than the long-range planning horizon. Most concerning, cooperative planning was started in the latter half of 2020 focused on design details rather than evaluation of corridor mobility needs and improvement alternatives.

The Federal Highway Administration (FHWA) Transportation Planning Process Briefing Book states the following in its Introduction.

"Transportation at its core is about mobility and access. Patterns of growth and activity for people and goods across America are fundamentally driven by how well the transportation system delivers mobility and access. The performance of the transportation system also affects public policy concerns, such as safety, air quality, environmental resource consumption, social equity, resilience, land use, urban growth, economic development, and security. Transportation planning recognizes the critical links between transportation needs and other societal goals."

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments within the City of Houston will bypass the Planning and Environment Linkages (PEL) process which is intended by Congress and FHWA to accelerate project delivery with early cooperative and comprehensive planning. According to the FHWA webpage, "Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that 1) considers

Council Members: Amy Peck Tarsha Jackson Abbie Kamin Carolyn Evans-Shabazz Dave Martin Tiffany D. Thomas Greg Travis Karla Cisneros
Robert Gallegos Edward Pollard Martha Castex-Tatum Mike Knox David W. Robinson Michael Kubosh Lelitia Plummer Sallie Alcorn
Controller: Chris Brown

environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analysis, and products developed during planning to inform the environmental review process.”

City officials believe that a thorough analysis of transportation demand, travel patterns, and environmental impacts is warranted given recent telework experience and technological advances changing how people and goods will move. Data from these analyses could impact the need and purpose for each project. They should be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated. In addition, relevant City efforts including Houston’s Climate Action Plan goal to “Reduce Vehicle Miles Travelled per capita 20% by 2050”, should be incorporated into the purpose of all projects within the city’s limits.

Below are project-specific comments on proposed RTP amendments within City of Houston limits.

Hempstead Road

Proposed Amendment: Reconstruct Hempstead Road and add one transit lane in each direction at grade and construct 4 elevated managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Elevated lanes have not been coordinated.
- Significant work funded by the metropolitan planning organization has focused on development of commuter rail in the Hempstead corridor. This does not appear to have been considered or recommended.
 - The H-GAC High Capacity Transit Framework approved by TPC states, “Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways.”

IH 10W from IH 610W to IH 45

Proposed Amendment: Reconstruct 10 mainlanes and two 2-lane frontage roads and construct 4 new non-toll managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Result of METRO’s Inner Katy Bus Rapid Transit (BRT) service to accommodate additional travel demand should be recognized before consideration of additional capacity.

IH 610W from IH 10W to IH 69S

Proposed Amendment. Construct 4 express lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Previously canceled due to significant public opposition.

IH 10W Studemont to Houston Ave.

Proposed Amendment: Reconstruct to raise the existing 10 mainlanes out of the White Oak Bayou floodway, for reconstructing 2 lane CBD connectors to 4 managed lanes.

- Maintain METRO Inner Katy Bus Rapid Transit (BRT) dedicated access to downtown.
- Removal of structures from the floodway consistent with Resilient Houston goals.

SH 35 from Dixie Drive to Brazoria County Line

Proposed Amendment: Construct new 6 lane freeway with 2 new 2-lane frontage roads.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.

- Significant work funded by the metropolitan planning organization has focused on development of commuter rail in the SH 35 corridor. This does not appear to have been considered or recommended.
 - The H-GAC High Capacity Transit Framework approved by TPC states, "Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways."
- Limit footprint to within Mykawa Road right of way to minimize impacts on residents.

IH 610E at Ship Channel

Proposed Amendment: Reconstruct and raise Ship Channel bridge.

- Consistent with Resilient Houston goals.

SH 6 from Clay Road to IH 10W

Proposed Amendment: Feasibility Study

- The City of Houston looks forward to early and continuing cooperative and comprehensive participation in the study.

Conclusion

The City of Houston has committed to several mobility-related actions as part of an ongoing effort to improve citywide resilience. Among them are the following elements City officials will work with regional partners to incorporate into project planning and development.

- Engage Houstonians in the design of mobility infrastructure. As regional partners make significant investments in increased mobility options in the coming years, it is imperative that Houstonians who will be impacted most have a voice in the planning process. The City will work with regional partners to form and facilitate a collective community engagement framework that consists of shared principles, coordinated processes, common tactics, and measurable outcomes for infrastructure projects within the city.
- Target transportation demand management (TDM) programs to reduce single-occupancy-vehicle travel and better manage demand on our transportation network.
- Upgrade Houston's highway network with two-way HOV and HOT lanes. Expanding two-way high-occupancy vehicle (HOV) and high-occupancy toll (HOT) lanes will encourage more Houstonians to choose sustainable transportation choices when commuting to regional job centers, while requiring less space per traveler than Single Occupancy Vehicle (SOV) lanes.
- Consistent with local standards, effectively manage water drainage on and from I-10 as well as holding water before entering the storm sewer system.

The combined Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes proposed as amendments to the 2045 RTP with 2026-2030 construction dates seem to indicate an intent to construct core elements of a regional elevated express lane system. Initiation of federal environmental review for the Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes seems premature given that a network of interconnected elevated express lanes remains a planning-level concept. The vision of a regional elevated express lane network has not been vetted with the public, reviewed or approved by the H-GAC Transportation Policy Council, nor contemplated in the 2045 Regional Transportation Plan adopted by the agency responsible for regional transportation planning less than two years ago in May 2019. The City of Houston respectfully requests that H-GAC conduct a study, including public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP.

The 2045 RTP states that, "H-GAC's mission is to plan for the orderly growth and development of the region, working in concert with multiple planning partners. This mission involves building region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity." City of Houston officials are committed to continuing work with H-GAC and regional

partners to build region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy and fostering equity through a continuing, cooperative and comprehensive planning process.

Thank you for the opportunity to provide comments on the proposed amendments to the 2045 RTP.

Sincerely,

DocuSigned by:
Veronica O. Davis
32CFF201328048D

Veronica O. Davis, PE
Director
Transportation & Drainage Operations

DocuSigned by:
David Fields
7FB57C03F045459

David Fields, AICP
Chief Transportation Planner
Planning & Development Department

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Gary Basinger

Organization

The Economic Development Alliance for Brazoria Cou

Submission Method

Email

Date Comment Submitted

04/19/2021

Comment

Please find attached a letter of support from the Alliance to add the 36A project to the 2045 RTP.

A hard copy of this letter was mailed to you today.

[View Attached Letter](#)

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.



2020 – 2021 Directors

Air Liquide America
Alvin Community College
Ascend Performance Materials
BASF Corporation
Brazoria County
Brazosport College
CenterPoint Energy
Central Brazoria County
Business Park
Chevron Phillips Chemical Co.
CHI St. Luke's Health Brazosport
City of Angleton
City of Clute
City of Freeport
City of Lake Jackson
City of Pearland
City of West Columbia
Cordoba Law Firm
Costello, Inc.
Cyanco International
Earl Shipp
EHRA Engineering
First State Bank, Louise
Freeport LNG Development
Freese and Nichols, Inc.
HDR Engineering
iAD Architects
IDC, Inc.
LJA Engineering
Mammoet USA South, Inc.
Manvel EDC
MSR International
Olin Corporation
Performance Contractors
Phillips 66
Port Freeport
Shintech, Inc.
SUEZ Water Technologies &
Solutions
Sweeny EDC
TDECU
The Dow Chemical Company
UTMB Health
Angleton Danbury Campus
Vernor Material & Equipment
Wood Group
Zachry Group

April 19, 2021

Mr. Craig Raborn
Houston-Galveston Area Council
P. O. Box 22777
Houston, Texas 77227-2777

Re: Adding the State Highway 36A Project to the 2045 Regional Transportation Plan

Dear Mr. Raborn,

On behalf of the Economic Development Alliance for Brazoria County, an organization tasked with promoting economic development in Brazoria County, we are writing in support of an amendment to add the State Highway 36A project to the 2045 Regional Transportation Plan.

Once completed, the Highway 36A project will provide an efficient, expanded and alternative transportation and freight corridor from Port Freeport to US 290 in Waller County. In addition, the Highway 36A corridor will provide another hurricane evacuation route from Brazoria and Fort Bend Counties to points out of harm's way.

The Highway 36A project will enhance H-GAC's freight mobility efforts by providing an automobile and freight route that goes around Houston and not into Houston. With the continued growth of the Houston region's population, we cannot continue to force automobile and freight traffic into Houston, we must develop a route around Houston, and the Highway 36A project is the ideal route.

For the future, the recent groundbreaking of Port Freeport Harbor Channel Improvement Project, which will deepen and widen Port Freeport, will only add to the amount of freight being moved on the Houston region's highway system. The Highway 36A project will add a regional transportation corridor that will connect Port Freeport to north Texas and beyond without adding to the congestion going into Houston.

TxDOT is currently expanding State Highway 36 to four lanes from Port Freeport to Rosenberg. We need to continue this momentum and construct the Highway 36A project to Interstate 10 and US 290 to provide maximum evacuation capacity and efficient freight mobility movement.

With the pace of development in Fort Bend County, completing the Highway 36A project sooner, rather than later, expands options and reduces the cost to construct this project as compared to undertaking this project at some further point in the future.

We therefore recommend the approval of an amendment to add the Highway 36A project to the 2045 Regional Transportation Plan.

Sincerely,

Jim Russ
Chairman of the Board

Gary Basinger, CEcd
President & CEO

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Clare Wrigley

Organization

None

Submission Method

Email

Date Comment Submitted

04/20/2021

Comment

I am a resident of Cottage Grove and have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

I oppose all options TxDOT has presented, and I encourage H-GAC to not accept the addition of the TxDOT I-10 Inner Katy Managed Lanes project to the 2045 Regional Transportation Plan. TxDOT should reconsider the scale of this project and look at alternatives that will have less impact on the neighborhood.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Glenn Venables

Organization

N/A

Submission Method

Email

Date Comment Submitted

04/15/2021

Comment

There are too many traffic lights that run 24 hours a day on minor side streets with very little traffic. These unnecessary lights add to air pollution, wasted fuel, and wasted time. I know of several lights in my neighborhood adjacent to large commercial buildings that have been unoccupied for several years, but formerly held hundreds of employees, yet the lights continue to operate with very light traffic. More traffic lights should be set to blink yellow/red, replaced with stop signs, or eliminated.

Response

Thank you for your input. Please see the response from TxDOT below.

TxDOT response: TxDOT's is continuously evaluating new tools, technologies, and techniques to improve safety. Thank you for your comment.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Glenn Venables

Organization

N/A

Submission Method

Email

Date Comment Submitted

04/15/2021

Comment

The Hurricane Evacuation Routes do not consider road flooding that routinely occurs at low spots and feeder roads. Low areas should be addressed.

Response

Thank you for your input. Please see the response from TxDOT below.

TxDOT response: Per federal and state design criteria, all projects are evaluated and designed to meet prescribed drainage criteria. The National Oceanic Atmospheric Administration (NOAA) published a new atlas for precipitation frequency covering the United States, which is entitled Atlas 14. You can find more information here: <https://hdsc.nws.noaa.gov/hdsc/pfds/index.html>.

Numerous and heavy storms and the associated flooding have necessitated changes to design standard to incorporate the new Atlas 14 design standards for infrastructure improvements. The new Atlas 14 guidance will assist in our ability to mitigate flood impacts. Further, TxDOT does coordinate with local governments in the region to identify and address problem areas. This coordination with the local governments is helpful in identifying specific locations of concern so that we can eliminate the effect of flood events by raising the road and/or facilitating evacuation.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Glenn Venables

Organization

N/A

Submission Method

Email

Date Comment Submitted

04/15/2021

Comment

TxDOT has done a terrible job designing major freeway expansions at I-45 Gulf Freeway southbound Exit 25 through Exit 24. In a distance of ~1/2 mile, I-45 southbound goes from 5 lanes, to 4 lanes, to 3 lanes, with a disappearing weaving lane for entering traffic and exiting traffic for the NASA One bypass. This often creates a 1 to 4 mile span of southbound backed-up traffic from El Dorado Blvd. to Bay Area Blvd. to 528 to NASA One to League City.

Response

Thank you for your input. Please see the response from TxDOT below.

TxDOT response: At this time, the lane reduction on IH-45 is a temporary condition. When the IH-45 widening project to the south of this location between NASA 1 and FM 518 is complete, there will be 10 mainlanes on I-45 (5 in each direction) with an HOV lane in each direction at NASA 1. Once IH-45 is in the final configuration, the referenced lane reduction that is currently present on the IH-45 southbound main lanes approaching NASA 1 (5 lanes to 3 lanes) will be eliminated. The current construction project should alleviate some of the concerns discussed in the comment. In addition, TxDOT has initiated a Planning and Environmental Linkage (PEL) study for I-45 south (Gulf Fwy). This study will evaluate major investments needed for improving congestion and safety, while mitigating environmental factors such as flooding. Please follow the I-45 PEL by going to our website: <https://www.txdot.gov/inside-txdot/gulf-freeway-pel-study/about-gulf-freeway-study.html>

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Katie Niemann

Organization

Cottage Grove Civic Association

Submission Method

Online

Date Comment Submitted

04/21/2021

Comment

Dear H-GAC – Transportation Planning,

I am a resident of Cottage Grove, a neighborhood directly adjacent to the north and south of I-10, just inside I-610 Loop W. I have recently been informed of the I-10 Inner Katy Managed lanes project. After reviewing the project materials, I am very concerned about all concepts proposed and the impacts they may have on my home and neighborhood.

Concept A appears to threaten homes along the feeder and our only green space, Cottage Grove Park. Concept B brings the noise and pollution of I-10 upwards on elevated freeway decks and projects it across our neighborhood.

Concept C does both – elevating the freeway lanes and then bringing them immediately adjacent to our homes and park.

I oppose all options. H-GAC should reconsider their support of this project and look at alternatives that will have less impact on the neighborhood.

Sincerely,
Katie Niemann

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Feng Feng

Organization

N/A

Submission Method

Online

Date Comment Submitted

04/23/2021

Comment

The 2045 RTP is an impressive yet challenging step forward for the H-GAC area. Given the limited information released to the public, it is still unclear what data and assumptions are used to make projections about the future transportation need, for each project. However, the fact that 2045rtp.com only refers to the 1990 to 2015 data to support the necessity of the 2045 RTP is worrisome: the 1990-2015 data don't account for the recent changes which significantly impact the future transportation need of the H-GAC area, including, the post-pandemic work-from-everywhere new norm, the oil bust post-2014, and the ongoing shifts from ICE vehicles to EVs. You don't want to build some overly planned, highly invasive mega projects that no one will use. As a result, I highly recommend making the projects, at least the disruptive ones, more transparent and adaptive.

For example, the Inner Katy BRT and Inner Katy managed lanes projects will be disruptive in the narrow Inner Katy corridor. Rather than planning and building the two competing projects almost in parallel, it's better to build one first (e.g. the BRT), evaluate its impact, estimate the updated future need, then plan and build another.

In this way, we'll have more capital efficient, less invasive projects that better serve the 2045 goal.

Response

Thank you for your comment.

The 2045 Regional Transportation Plan (RTP) update process began in 2017 and completed in 2019. The data we used were up to date at the time when the process started. We did projections based on the data we had and made recommendations for the next 25 years. The Regional Transportation Plan will update every four years to make sure our recommendations are compatible with the changing needs in the region. The next full update to the RTP will begin later this year we will take your comment into our consideration for the 2050 RTP. The 2050RTP development process will include public involvement process and we encourage your participation.

We use Call for Projects process on a regular basis tentatively once every three years to select the projects for programming in the Transportation Improvement Program (TIP), the 10-Year Plan, and inclusion in the RTP. Last Call for Projects Process was conducted in conjunction with the development of 2045RTP. All projects submitted through the 2018 Call for Projects (2018 CFP) were evaluated based on 50% score (100 points) given to its benefit/cost ratio and 50% score (100 points) given to various planning factors. The benefit-cost analyses were focused on reduction of crashes, delay and emissions. Please refer to 2045 RTP Appendix P for more details about "Call for projects evaluation criteria". Thank you again for your participation and comment. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

A.P. Thomas

Organization

citizen

Submission Method

Online

Date Comment Submitted

04/24/2021

Comment

Some folks in the region have been trying to push this 36A Highway (more than ten years ago) as a TOLL road that Waller Co. citizens would pay for thru bonds, etc. - (for the destruction of farm land) under the guise of bringing jobs....what jobs, for whom, and who asked for them? Sold it as urgency so we can get down to Freeport without a traffic jam so we can get to the port. (I been to Freeport once, I didn't know I needed ANOTHER TOLLWAY (you can pick it up in Pearland area and take all the way-many ways thru Houston. More globalist projects paid for at locals expense. This is like to BS toy train to Dallas, another scam private corp. project, with (corrupt imminent domain status)! DId you hear one of those presentations in local community, ('we have to have the toy train (50 plus year old technology) or I-45 is going to be a 35mph travel speed to Dallas in just a few years!' Sure, who doesn't want to drive to the Galleria to get felt-up by TSA perverts during a private business transaction (buying a service from the private corp). To go to Dallas to then what, rent a car to get around?! No thanks to funding globalist projects. PS the toy train doesn't have any project profits scheduled-but federal bailouts will come....

Response

Thank you for your comment. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Drew Wiley

Organization

Cottage Grove Civic Association

Submission Method

Online

Date Comment Submitted

04/26/2021

Comment

Dear H-GAC- Planning and Projects Committees,

The elected leadership team of the Cottage Grove Civic Association and would like to provide comments on behalf of the neighborhood and its residents. For those unfamiliar, Cottage Grove is adjacent to I-10 on the north and south, generally centered at T.C. Jester. Cottage Grove is home to approximately 5,500 residents as of the 2019 American Community Survey.

After review of the Inner Katy Managed Lanes preliminary concepts and associated materials, we strongly oppose all options listed. Each concept has substantial potential impact on our community in the form of road-noise, right of way (ROW) acquisition, or traffic pollution. Cottage Grove, as well as many other neighborhoods in this corridor, were established before the construction of I-10 and have become some of Houston's most densely populated areas. All options, most especially concepts C and A would have unacceptable impact and will be met with extreme neighborhood opposition.

We recommend H-GAC reconsider their support of the project and review alternatives that will be less impactful to the adjacent neighborhoods. TxDOT has created similar 2-Lane managed lanes further west on I-10 and other freeways. We believe TxDOT would accomplish many of its goals with this design and with minimal neighborhood impact.

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Vivian Tan

Organization

Resident of Cottage Grove

Submission Method

Online

Date Comment Submitted

04/26/2021

Comment

Hi,

I am a resident of Cottage Grove and was made aware that H-GAC is planning to add the Inner Katy managed lanes project to their regional plan. I am strongly opposed to that project because of the impact it will have on my neighborhood. This is one of Houston's densest corridors and its amazing that TxDOT is planning to do what they always do - keep adding lanes and destroying neighborhoods. TxDOT's previous projects have shown plenty of times that more lanes won't fix traffic. The federal government stepped in with the NHHIP and this project is very similar. I strongly encourage H-GAC to reconsider their support of this project and look at mass transit alternatives that will actually benefit the residents of the region.

Thank you,

Vivian

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Robert Pechukas

Organization

Highway 36A Coalition

Submission Method

Email

Date Comment Submitted

04/21/2021

Comment

[View Attached Letter](#)

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

HGAC MAILROOM

2021 APR 21 AM 8:32



**Resolution in Support of the Amendments to the
HGAC 2045 Regional Transportation Plan
15 April 2021**

WHEREAS, the Highway 36A Coalition is an advocate for the development of regional transportation infrastructure from the Brazosport area to Hempstead and beyond.

WHEREAS, the 36A route proposed as amendments to the 2045 Regional Transportation Plan will provide an efficient and expanded transportation and freight route from Port Freeport to US 290. It involves a route from the Rosenberg\Needville\169 area in Fort Bend County to Interstate 10 (36A Southern Route) and a continuing piece from Interstate 10 to US 290 (36A Northern Route) in Waller County.

WHEREAS, these routes are necessary for enhanced evacuation capacity given State Highway 36 is a primary evacuation route for Southern Brazoria County and for efficient freight movement as a means of current and future need identified by H-GAC in their freight mobility efforts to route traffic outside the metropolitan core. With the groundbreaking of Port Freeport Harbor Channel Improvement Project, ensuring that Port Freeport will be the deepest Port on the Gulf Coast and throughout the region, we need to have foresight to ensure transportation mobility is there as the Port grows, among other benefits delivered by the two projects.

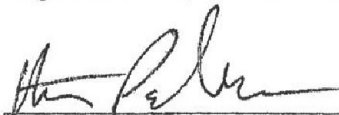
WHEREAS, the Highway 36A Coalition is a 501(c)4 nonprofit consisting of local governments, elected officials, private businesses, and individuals working together to advocate for the responsible development of a regional transportation corridor connecting Port Freeport and the Brazosport area to north Texas and beyond without adding to the

congestion in the Houston metropolitan area. Our mission includes improving hurricane evacuation, efficient mobility, and economic development for the region and the state.


WHEREAS, the 2045 Regional Transportation Plan is hugely important to the future planning of regional mobility, congestion mitigation, quality of life, safety, and efficient movement of goods. We appreciate the effort. TxDOT is currently underway with a 2 to 4 lane expansion from Port Freeport to Rosenberg. This route needs to continue in an efficient path to Interstate 10 and to US 290 to provide maximum benefit of evacuation safety and efficient freight mobility movement.

WHEREAS, H-GAC knows well that planning is the key to ensuring the most effective routes at the most reasonable costs to achieve their goals. Doing so before development occurs expands options and reduces cost. For this reason, we have particular concern that the Southern Route be incorporated this year at minimum. The pace of development in Fort Bend County poses great risk to the future location of such a route and threatens to increase cost, should they not be undertaken now. 36A Southern Route provides the key connection from Port Freeport and Brazoria County to Interstate 10 and provides enhanced evacuation, safety, freight mobility and commerce throughout the region.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Highway 36A Coalition hereby recommends approval for the amendments to add 36A to the 2045 Regional Transportation Plan.



Robert Pechukas,
Co-Chair, Highway 36A Coalition



Jeremy Heath
Co-Chair, Highway 36A Coalition

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

David Hagy

Submission Method

Online

Organization

American Council of Engineering Companies (ACEC) H

Date Comment Submitted

04/27/2021

Comment

To: Houston-Galveston Area Council (H-GAC), Regional Transportation Plan and Air Quality Conformity Public Comment

Re: Support for the Amendments to add Highway 36A to the 2045 Regional Transportation Plan

The American Council of Engineering Companies (ACEC) Houston is comprised of over 245 firms in the region for the purpose of advancing the private practice of consulting engineering and educating public officials on the importance of infrastructure investment. As advocates for the development of transportation infrastructure, ACEC Houston supports the amendments to add Highway 36A to the list of projects in the 2045 Regional Transportation Plan.

The routes included in 36A will provide efficient and expanded transportation from Port Freeport to US 290 and are necessary for enhanced evacuation capacity given that State Highway 36 is a primary evacuation route for southern Brazoria County. In addition, the routes are important for efficient freight movement outside the metropolitan core, a priority for the H-GAC. With the groundbreaking of the Port Freeport Harbor Channel Improvement Project, we need to ensure that mobility keeps up with the Port's growth.

The 2045 Regional Transportation Plan is very important to the future planning of regional mobility, congestion mitigation, quality of life, safety, and the efficient movement of goods. H-GAC knows well that, if possible, building before development expands options and reduces cost. For this reason, the Southern Route should be incorporated this year at minimum. The pace of development in Fort Bend County poses great risk to the future location of such a route and threatens to increase costs should it not be undertaken now. The 36A Southern Route provides the key connection from Port Freeport and Brazoria County to Interstate 10 and provides enhanced evacuation, safety, freight mobility, and commerce throughout the region.

Thank you for this opportunity to comment. Please contact me if you have questions or need more information.

Sincerely,

David Hagy
Executive Director
American Council of Engineering Companies (ACEC) Houston
(713) 426-0800 (Office) | (703) 835-2735 (Cell)

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Mary Anne Piacentini

Submission Method

Online

Organization

Katy Prairie Conservancy

Date Comment Submitted

04/27/2021

Comment

The Katy Prairie Conservancy appreciates the opportunity to provide comments to the proposed amendments to H-GAC's 2045 Regional Transportation Plan.

The Katy Prairie Conservancy (KPC) has protected over 18,000 acres of contiguous natural lands on the historic Katy Prairie in Harris and Waller Counties, for the benefit of people and wildlife and an additional 6,448 acres in Matagorda, Jackson, and Brazoria Counties. Preserved lands in Harris and Waller Counties (the Katy Prairie Preserve) provide excellent habitat for the many upland and wetland species that live or migrate on the coastal prairie while also providing multiple benefits to the public, including recreation, local agricultural production, water quality benefits, enhancements to mental and physical health, and improvements to the quality of life for all residents. Land management activities by KPC, such as native prairie restoration, wetlands enhancements, invasive species control, prescribed burns, and sustainable grazing practices, further enhance these benefits. Prairie grasses also absorb and hold floodwaters back from downstream and allow them to release more slowly, native grassland soils store carbon which make our air cleaner, and wetlands filter rainwater and resulting pollutants and sediment, thereby helping improve water quality.

Of continued interest to KPC is the possibility of a new 36A thoroughfare project, and in particular the segment north of I-10, project 18720. KPC is not aware that a route has been selected for 36A nor that TxDOT has narrowed the corridor to Waller County. However, the map included as "Attachment - B DRAFT RTP 2045 TXDOT Amendment Projects" includes a dotted red line that appears to cross directly over the Katy Prairie Preserve. Further, during the public meetings held on April 8, HGAC planners referred to the 36A project as affecting Waller County, with a connection ending at 290 within Waller County.

KPC requests that any reference to 36A be clarified to remove any materials or references that imply that the corridor has been narrowed to Waller County, and that the dotted red line be deleted from "Attachment - B DRAFT RTP 2045 TXDOT Amendment Projects."

We do note that an additional attachment "Attachment - B 36A North and South Study Area," indicates that the 36A project could be sited anywhere on the east from the Grand Parkway (99) in Harris County to an area west past Highway 36 in Austin County.

KPC requests that this larger study area map is the only map that is appropriate to include in any reference to the 36A project.

As noted in Chapter 3, Natural Environment, "The parks, open spaces, natural areas, farmlands and waterways are indispensable and contribute to the economy and the health and quality of life of residents.... [Unless] proactive action is taken, we stand to lose or significantly impair these resources and the important ecological services that they provide to the region. In addition, the ongoing disappearance of undeveloped land will have serious consequences for air and water quality, agricultural productivity, wildlife habitat, opportunities for recreation and pursuing healthy lifestyles, and keeping the region's character and cultural heritage. The challenge is how to plan for the projected urban growth and increased mobility while conserving our high priority natural resources and preserving the ecological diversity of our region."

The 2045 RTP also addresses indirect environmental impacts:

- "Flood risk increases as forests, grasslands, and wetlands in the flat and low-lying metropolitan region are replaced with rooftops and pavement."
- "H-GAC also recognizes that transportation infrastructure projects can have foreseeable consequences that occur later in time but not necessarily near the project site. Through its policies, impacts must be considered during the transportation planning process. Strategies for mitigating these impacts include using spatial environmental data tools to evaluate the impact of potential projects; promoting low-impact developmental practices in transportation projects and subsequent development; and coordinating with other air and water quality and land conservation efforts in project areas."
- KPC requests that H-GAC consider the serenity of the preserve for both people and wildlife would be harmed in multiple ways by a major road on or adjacent to the Katy Prairie Preserve:
- Land Fragmentation. Unfragmented and contiguous lands are critical to the wildlife populations that live on the Katy Prairie. Land fragmentation impacts not only farming and ranching activities, but also negatively impacts many plants and animals that live on the prairie and require connected habitat to maintain healthy populations. A thoroughfare across the preserve would disrupt those connections.
- Wildlife Disturbance. The Katy Prairie is at the southern terminus of the Central Flyway providing winter habitat for migratory waterfowl, shorebirds, and Sandhill cranes. The Katy Prairie Preserve has been designated a Global Important Bird Area by National Audubon, one of only 20

such designations in Texas. These grasslands provide respite for upland birds, many of which are in decline due to the loss of grassland habitat elsewhere. In addition, many birds and other prairie animals are sensitive to light, sound, and vibration and would be driven away by the construction and operation of any new roadway that cuts a new path through any part of the preserve system or that is sited in close proximity to the Katy Prairie Preserve.

- **Soundscape.** Busy roadways create noise that seriously diminish this community asset for both people and wildlife. The Katy Prairie is a serene place where one can hear the calls of native birds and insects. The soundscape is a very important environmental characteristic that KPC is trying to retain. Quiet places are few and far between these days; keeping the Katy Prairie Preserve's soundscape quiet should have high importance when considering new infrastructure.
- **Destruction of Habitat.** The land on which a thoroughfare would be constructed would be destroyed and greatly altered by a roadway and associated infrastructure, as well as by subsequent associated development.
- **Pavement and adjacent development** will exacerbate flooding and minimize the benefits that KPC lands and other natural lands on the Katy Prairie already provide to slow down, absorb, and store water.
- **Quality of Life Impact.** In addition to the benefits the Katy Prairie Preserve system provides to wildlife, the prairie also offers significant benefits to the public by improving air and water quality, providing nearby agricultural products, and offering much needed recreational opportunities – all of which improve the quality of life for area residents. These benefits would be degraded by a new roadway impacting KPC's preserve system.

KPC urges transportation planners to respect the myriad benefits that the Katy Prairie Preserve provides to the region including water quality, flood mitigation, local agriculture, wildlife habitat, physical and mental health benefits, and carbon sequestration. As set forth in the 2045 RTP, these values must be fully considered as transportation projects are evaluated, particularly major thoroughfares that not only directly impact the lands over and adjacent to the projects, but also cause many indirect impacts as working and natural lands are fragmented and developed. It is appropriate for a multi-billion-dollar project, such as the proposed 36A project, to be studied in accordance with the required process, including the evaluation of environmental impacts, and that HGAC refrain from any communications that imply a circumvention of this process.

The transportation planning process should frame the discussion of new roads sensibly and sensitively with proactive guidance for the protection of natural resources. By starting early there is the option and flexibility to adjust the route, but the natural resources cannot be moved nor replaced. The study should treat ecological and environmental concerns as of the utmost and fundamental importance and should reconcile transportation needs with natural imperatives, not the other way round. Once natural assets are lost, they are lost forever. We have the opportunity and the responsibility to make sure that these natural assets are preserved and enjoyed by future generations.

Thank you for the opportunity to comment on the proposed amendments.

Mary Anne Piacentini, President and CEO, Katy Prairie Conservancy

Michael Huffmaster, Board Member and Chair, Public Affairs Committee, Katy Prairie Conservancy

Response

Thank you for your participation and comment. We will take the points of your comment into our consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level. As per the requested comment the June TAC/TPC amendment material will include the study area to represent Highway 36A projects 18719 and 18720.

Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

TX Crocken

Organization

Concerned Citizen

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

None of these plans seem to care about the systemic changes Americans need to make for climate change. The Covid-19 Pandemic has shown that many people can work from home and that will make suburbs and commuting both less desirable. Continuing to plan racist and unjust highway expansions is wildly offensive to many Houstonians.

With a 61% increase in population, the H-GAC assumes a 61% increase in single-occupancy vehicle usage. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide a data based justification used to estimate a 61% increase in vehicle usage?

Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes. For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs): The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Texas Lynn

Organization

Resident

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Unfortunately, this amendment includes various roadway widenings and lane additions. Lane construction will never solve for roadway congestion in the long-term. The field of transportation planning is slowly addressing this across the United States. It is disappointing to see these costly plans still being recommended here in Harris County when they will certainly not solve the long-term problem. In addition, these construction projects will have long-term negative health impacts to those residents who live nearby. Additional lanes mean additional pollutants and overall worse air quality for Harris County residents. Adding lanes does not support any touted air quality goals—it works against them. I am a resident of Houston I am opposed to these roadway expansions and lane additions included in this amendment.

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Desiree Alejandro

Organization

Individual

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

With a 61% increase in population, the H-GAC assumes a 61% increase in single-occupancy vehicle usage. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide a data based justification used to estimate a 61% increase in vehicle usage?

The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA's and USDOT's pause of the project.

Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706, and justification for 18701, 18702, 18703, 18704, and 18705.

Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets

Please include discussion of air quality related health risks and benefits

Response

Thank you for your comment to the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process.

The agency provides a public data lab ([link](#)) and documentation ([link](#)) explaining its forecasting processes.

For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs): The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards.

Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air pollution and health effects.

See below response from TxDOT for comment on NHHIP and Hempstead Road projects

TxDOT response: Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project.

The Federal Highway Administration's review of the NHHIP does not preclude the projects inclusion in the 2045 RTP.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Martha Beaudry

Organization

Resident of Northside

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

It is very important that there be adequate, safe connectivity between Northside and Heights. Right now, the safest crossing is at Patton and I-45 because it is a 4-way stop. Many people in Northside don't drive (you see Fiesta trucks driving the neighborhood picking up shopping carts). Making everyone go to North St. to safely cross over isn't sufficient. To begin with, Browning elementary is on Patton.

Response

TxDOT's response does not address the question: "The Hardy Toll Road (HTR) Extension will only function to its full potential as a reliever route with the NHHIP constructed as proposed. The following are two critical improvements that are included with the NHHIP (and are only possible with NHHIP) that will make I-45, I-610, and HTR function as complimentary transportation corridors:

- 1) I-45/I-610 Interchange reconstruction. This interchange was constructed in the 1950s and has an outdated design with left-hand exits from freeway to freeway and there is no frontage road system through the interchange to prevent neighborhood cut-through traffic. The proximity of the HTR existing termination to this interchange exacerbates the safety and capacity I-45 and I-610 which carries a high volume of freight traffic from Port Houston.
- 2) The HCTRA HTR extension design (without NHHIP) has two lanes each direction merging to one lane at I-10/I-69 as it has to tie into the existing I-10 to I-69 connector ramps. This will result in a mixing of traffic between users desiring to get to/from the Hardy Toll Road with users desiring to access I-10 and I-69. The NHHIP plan reconfigures the HTR Extension so that it no longer connects to a freeway to freeway connection, but instead the HTR will have a dedicated connection that gives users the option to connect to downtown or stay on the freeway. This option is ONLY possible through NHHIP."

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Clair Hopper

Organization

Citizen

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

This phase of the Regional Transportation Plan represents a huge potential step forward for our region, but I am disappointed to see several steps backward. Despite significant public outcry to massive car-centric infrastructure investments like the NHHIP, this plan continues to center pollutive, inefficient, and unjust single-occupancy-vehicle transportation. With such initiatives as major expansions of I-10 and 610; expansions of SH99; and creation of an all new highway, SH36A; this Plan will ensure that our region spends billions of dollars on infrastructure that limits our choices and pollutes the very air we breathe.

The negative health outcomes of living next to highways is well documented by now, as you should know from the public outcry and federal investigation surrounding the NHHIP. By continuing to create more and larger highways, you are subjecting Texans—the people you have chosen to represent and serve—to respiratory illness, pre-term births, increased mortality, and more. These are serious issues, and the rest of the country knows it: our region has been out of compliance with EPA air quality standards for quite some time, and I fail to see how this new Plan will do anything but worsen our air quality.

I believe that you, the agency responsible, owe your constituents clearer and stronger justification for these massive and dangerous projects. Please, provide us with the following:

- 1) With a 61% increase in population, the H-GAC assumes a 61% increase in single-occupancy vehicle usage. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide a data based justification used to estimate a 61% increase in vehicle usage.
- 2) The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA's and USDOT's pause of the project.
- 3) Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706, and justification for 18701, 18702, 18703, 18704, and 18705.
- 4) Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets
- 5) Please include discussion of air quality related health risks and benefits in this RTP.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes.

For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs): The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air pollution and health effects.

See response to you comments on NHHIP and Hempstead Road from TxDOT below
IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the projects inclusion in the 2045 RTP.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Molly Cook

Organization

self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I do not understand how the HGAC can confidently claim that a 61% increase in population automatically translates to a 61% increase in single occupancy vehicle usage. Can y'all produce any data to support that?

Why does the HGAC assume that air quality will improve even if VMTs go up? Can y'all explain it?

Additionally, why does this suddenly change in 2045? These charts make no sense.

I do not think any of these assumptions make sense, so the entire RTP is predicated on flawed assumptions. I do not support most of the 2045 RTP because most of the projects involve adding main lanes without robust consideration of walking, biking, or transit infrastructure. We have to be thinking and acting and spending differently, or this region will be nightmare to navigate by any mode of transportation. We, as serious non-attainers, should be looking for ways to be proactive about improving air quality at all costs. I am an ER nurse and public health nurse in my late twenties, and I can say with confidence that my biggest health risks right now are poor air quality and car dependence. Further comments below:

1. RTP fact sheets published with the 2045 RTP and its amendment state that the HGAC region will experience a 61% population growth and corresponding 61% increase in vehicle ownership over the next 25 years. The transportation infrastructure built between now and 2045 is one of the most influential drivers of future vehicle ownership. The RTP should be addressing future population growth using methods that efficiently and sustainably move the population while also ensuring that households without a vehicle are provided the same transportation equity as vehicle owners. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide the data-based justification used to estimate a 61% increase in vehicle usage.

2. The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA and USDOT's pause of the project.

3. SH99 (grand parkway) expansion from 4 lanes to 6 lanes is a perfect example of induced demand and unsustainable transportation paradigm. The growth around this road is facilitating further destruction of the Katy Prairie, an ecosystem critical to manage flooding of regional watershed. The portion of the Grand Parkway proposed for expansion was completed less than 10 years ago. The RTP needs to be investing in transportation infrastructure that will be effective for longer than 10 years.

4. The new SH-36A is a disruption of precious continuous prairie land.

5. Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706 and justification for 18701, 18703, 18704, and 18705.

Is alignment of the I-10 Winner Katy corridor required for completion of the METRONext plan?

The proposed amendment does not respect the city of Houston and Harris County's stated goals to reduce VMT in the region over time.

8. Projects in the RTP should be prioritizing safety; expanding lanes and increasing VMTs do not align with Vision Zero initiatives.

Of gravest concern, is that the "Transportation Conformity" Chapter, titled "Air Quality" in the 2045 RTP table of contents, misleadingly represents the region's air quality status.

While we appreciate the need for the chapter to discuss and present the conformity process and results, the lack of information and data presented on the ozone standard and the region's attainment designation is striking. In essence, there are two air quality standards of interest for the Houston-Galveston-Brazoria (HGB) region—one that the region meets (the Texas Commission on Environmental Quality's (TCEQ) Motor Vehicle Emission Budgets (MVEB) for nitrogen oxides (NOx) and volatile organic compounds (VOCs)) and one that it does not (the Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) Ozone standard). The chapter overwhelmingly focuses on the TCEQ MVEB

standard; 4 of the chapter's 7 pages are of charts and tables showing the region meeting the emission budgets. Nowhere in the chapter, however, are similar tables, charts or data illustrating the region's nonattainment to EPA's ozone standard. We are concerned that the information presented, and omitted, gives the false impression that the region is successfully meeting air quality standards, when in reality, it is not. This is yet more concerning given that the region's ozone readings are actual—obtained via dozens of air quality monitoring sites across the region—whereas TCEQ's MVEB targets are theoretical and model-derived.

To improve this, we request/ recommend:

- Provide a clear representation of the region's actual air quality status;
- Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets;
- Include data, charts, tables regarding the EPA ozone standard.

9. The stark disconnect between conformity results (conformity achieved) and actual ozone readings (serious nonattainment) highlights the flaws in the Texas air quality regulatory process. Conformity data presented on pages 5-7 of the Transportation Conformity chapter shows the HGB region easily meeting MVEBs under moderate and serious RFP SIPs for years 2020 through 2045. Meanwhile actual ozone readings from TCEQ air quality monitoring stations (for 2020) continue to designate the region as serious nonattainment. This disconnect demonstrates that the combination of using TCEQ's MVEBs coupled with the EPA's MOVES2014 model is not a proper tool to help Texas MPOs meet the federal ozone standard. TCEQ's MVEBs, shown on pages 5-7, are particularly divorced from reality and unhelpful targets.

To address this, we request/recommend:

- Work with TCEQ and other state MPOs to revise the MVEB process;
- Give less credence to the conformity results especially within planning purposes and when sharing information with the public. The conformity process is complex, confusing, is disconnected from actual ozone levels, and should not be the basis for the region's air quality decisions. Instead, air quality planning and programs should be developed with the end goal of meeting the Federal ozone standard.

10. Rewrite the Transportation Conformity/ Air Quality chapter as a more user-friendly document with the public in mind.

Conformity and the air quality regulatory process is complex and confusing. The way that the Transportation Conformity/ Air Quality chapter is written and presented makes it more so. Throughout the chapter, a number of important acronyms are never spelled out. These include TCEQ, NOx, VOCs. Please remember that the RTP is a public facing document intended to present the region's long range transportation vision. This section is not digestible, lacks context (why do we care about air quality?), excludes references (footnotes 2 and 3), and provides very few leads for an individual to educate themselves on air quality issues.

To address this, we request/ recommend:

- Provide context; why is air quality important to the region;
- Use less technical language and spell out acronyms;
- Provide information on the Transportation Control Measures and Emission Control Programs deployed across the region. Given the region's "serious attainment" designation, we would imagine the public to be interested in the region's efforts to reduce emissions.

11. Include discussion of air quality related health risks and benefits

Via the Clean Air Act, the NAAQS for six criteria pollutants were created as safeguards for public health. To be exact, they were created "to protect human health and welfare" from harmful pollutants; ozone having been identified by the EPA as one of the six criteria pollutants. The intent of an MPO's air quality efforts therefore must be with this health goal in mind. However, chapter 6 includes no discussion of human health or why the region should be concerned about VOCs, NOx, or ozone.

Across Texas, asthma (the clearest and most serious health risk tied to high levels of ozone) is the number one reason for school absenteeism. Child asthma rates are also found to be higher at schools with greater proximity to roads. A 2017 American Lung Association study found asthma levels to be higher in Houston than in most other parts of the country and are most concentrated in low-income and minority communities. Asthma rates, and health injustices, are yet another datapoint that must be considered while planning the region's transportation future.

To address this, we request/ recommend:

- Establish programs and goals that address the region's air quality related health issues with a focus on the populations and communities that suffer the brunt of environmental/ transportation-related health harms;
- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

12. As a whole, RTP 2045 (and its amendments) are in conflict with the region's air quality and health goals.

As long as H-GAC transportation planning prioritizes road expansion and single-occupancy vehicle travel over alternative transportation modes, as is done throughout RTP 2045, air quality, health, and road congestion will be horrendous in the region. For example, under the current plan, there will be a 61% population growth over the next 25 years, with a 61% increase in vehicles, and an increase of more than 100,000,000 VMT. When logic is applied, it is evident that a transportation forced to absorb 61% more vehicles would be crippled far beyond the existing congestion rates. RTP 2045 should plan for future population growth using methods that efficiently move the population, which is not with single occupant vehicles. The transportation infrastructure built between now and 2045 is one of the most influential drivers of vehicle ownership.

Again, please remember that the purpose of long-range transportation plans, such as RTP 2045, is to provide the public with a vision for the region. The vision that RTP 2045 presents is increased population, VMTs, congestion without identifying any programs or strategy for improving air quality and health outcomes.

To address this, we request/ recommend:

- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

13. Consider Greenhouse Gasses

The federal air standards do not yet regulate greenhouse gasses (GHG). The question of how and when GHG should be regulated, and added to the air quality standards, has been actively considered by the Clinton, Bush, Obama, and Biden Administrations. With greater concern over the climate crisis, there is reason to believe that GHG will be assessed in the coming years. We saw no references to GHG in Air Quality/ Conformity chapter.

To address this, we request/ recommend:

- Include discussion of GHG sources within the transportation sector;
- Set goals and strategies for reducing GHG emissions.

Thank you.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes.

For your comment regarding Chapter 6 of the RTP document, H-GAC will consider the addition of more air quality information on this chapter in the next conformity determination.

Also, for our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is our explanation: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

For your comment regarding the fact that in the future VMT goes up as air pollution goes down. these emissions reductions are due primarily to fleet turn over and the implementation of new federal standards. The Tier 2 emission standards implemented in 2004 for light duty gasoline vehicles and light duty gasoline trucks show emission reductions of up to 95% in NOx versus Tier 1 vehicles. In addition, the Clean Diesel federal rule, which was implemented in 2006 for heavy duty diesel vehicles, shows an emission reduction of 96% in NOx versus previous standards. The Tier 3 vehicle standards implemented between 2017 and 2025 reduces both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium-duty passenger vehicles and some heavy-duty vehicles. Once fully implemented, smog-forming volatile organic compounds and nitrogen oxides will be reduced by 80% from current levels, particulate matter will be reduced by 70%, and fuel vapor emissions will be driven to near zero levels. For more information on the emission reductions and the implementation timeline for these rules, please refer to the following EPA websites:

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-light-duty-vehicles-and-trucks-and>

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

https://theicct.org/sites/default/files/publications/ICCTupdate_Tier3_NPRM.pdf

Due to all the above emission standards for vehicles, the emissions in the transportation plan are being reduced in the future years due to fleet over turn although the VMT keeps increasing due to population increase.

The analysis of projects regarding their GHGs emissions is not required for a conformity determination. However, the federal government may require this analysis in the future for project selection and H-GAC will be happy to comply.

For your comment regarding the use of acronyms, H-GAC has a list of acronyms in the conformity website.

See response to you comments on NHHIP Segment 3, SH99, Highway 36A, Hempstead Road and IH 10 W/Inner Katy from TxDOT below IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the project's inclusion in the 2045 RTP.

SH 99

The current and projected travel demand on SH 99 warrants improvements to ensure continued mobility and safety in the corridor.

36A

36A North: (MPOID 18720) and 36A South: (0912-72-544, MPOID 18719)

At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

Inner Katy:

The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design. TxDOT identified improvement concepts are not expected to affect METRO's implementation of their Inner Katy BRT project. There may, however, be some partnership opportunities that must be considered through both agencies' efforts.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Chloe Cook

Organization

self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

The 2045 RTP is more of the same from the HGAC. Car dependency is choking and killing our region. We have to get serious about air quality, and we have to get serious about getting away from our car-centric paradigm. Many of these projects add main lanes and do not have biking or transit infrastructure. How are y'all going to expand the Grand Parkway when it is brand new? These projects are a waste of precious funds, and they will be a dysfunctional as every other highway expansion has been in the US for the last several decades. I urge you to consider more creative and effective solutions to our region's mobility needs. I also agree with all of the following comments and request the same answers from the HGAC:

1. RTP fact sheets published with the 2045 RTP and its amendment state that the HGAC region will experience a 61% population growth and corresponding 61% increase in vehicle ownership over the next 25 years. The transportation infrastructure built between now and 2045 is one of the most influential drivers of future vehicle ownership. The RTP should be addressing future population growth using methods that efficiently and sustainably move the population while also ensuring that households without a vehicle are provided the same transportation equity as vehicle owners. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide the data-based justification used to estimate a 61% increase in vehicle usage.

2. The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA and USDOT's pause of the project.

3. SH99 (grand parkway) expansion from 4 lanes to 6 lanes is a perfect example of induced demand and unsustainable transportation paradigm. The growth around this road is facilitating further destruction of the Katy Prairie, an ecosystem critical to manage flooding of regional watershed. The portion of the Grand Parkway proposed for expansion was completed less than 10 years ago. The RTP needs to be investing in transportation infrastructure that will be effective for longer than 10 years.

4. The new SH-36A is a disruption of precious continuous prairie land.

5. Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706 and justification for 18701, 18703, 18704, and 18705.

Is alignment of the I-10 Winner Katy corridor required for completion of the METRONext plan?

The proposed amendment does not respect the city of Houston and Harris County's stated goals to reduce VMT in the region over time.

8. Projects in the RTP should be prioritizing safety; expanding lanes and increasing VMTs do not align with Vision Zero initiatives.

Of gravest concern, is that the "Transportation Conformity" Chapter, titled "Air Quality" in the 2045 RTP table of contents, misleadingly represents the region's air quality status.

While we appreciate the need for the chapter to discuss and present the conformity process and results, the lack of information and data presented on the ozone standard and the region's attainment designation is striking. In essence, there are two air quality standards of interest for the Houston-Galveston-Brazoria (HGB) region—one that the region meets (the Texas Commission on Environmental Quality's (TCEQ) Motor Vehicle Emission Budgets (MVEB) for nitrogen oxides (NOx) and volatile organic compounds (VOCs)) and one that it does not (the Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) Ozone standard). The chapter overwhelmingly focuses on the TCEQ MVEB standard; 4 of the chapter's 7 pages are of charts and tables showing the region meeting the emission budgets. Nowhere in the chapter, however, are similar tables, charts or data illustrating the region's nonattainment to EPA's ozone standard. We are concerned that the information presented, and omitted, gives the false impression that the region is successfully meeting air quality standards, when in reality, it is not. This is yet more concerning given that the region's ozone readings are actual—obtained via dozens of air quality monitoring sites across the region

—whereas TCEQ's MVEB targets are theoretical and model-derived.

To improve this, we request/ recommend:

- Provide a clear representation of the region's actual air quality status;
- Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets;
- Include data, charts, tables regarding the EPA ozone standard.

9. The stark disconnect between conformity results (conformity achieved) and actual ozone readings (serious nonattainment) highlights the flaws in the Texas air quality regulatory process. Conformity data presented on pages 5-7 of the Transportation Conformity chapter shows the HGB region easily meeting MVEBs under moderate and serious RFP SIPs for years 2020 through 2045. Meanwhile actual ozone readings from TCEQ air quality monitoring stations (for 2020) continue to designate the region as serious nonattainment. This disconnect demonstrates that the combination of using TCEQ's MVEBs coupled with the EPA's MOVES2014 model is not a proper tool to help Texas MPOs meet the federal ozone standard. TCEQ's MVEBs, shown on pages 5-7, are particularly divorced from reality and unhelpful targets.

To address this, we request/recommend:

- Work with TCEQ and other state MPOs to revise the MVEB process;
- Give less credence to the conformity results especially within planning purposes and when sharing information with the public. The conformity process is complex, confusing, is disconnected from actual ozone levels, and should not be the basis for the region's air quality decisions. Instead, air quality planning and programs should be developed with the end goal of meeting the Federal ozone standard.

10. Rewrite the Transportation Conformity/ Air Quality chapter as a more user-friendly document with the public in mind.

Conformity and the air quality regulatory process is complex and confusing. The way that the Transportation Conformity/ Air Quality chapter is written and presented makes it more so. Throughout the chapter, a number of important acronyms are never spelled out. These include TCEQ, NOx, VOCs. Please remember that the RTP is a public facing document intended to present the region's long range transportation vision. This section is not digestible, lacks context (why do we care about air quality?), excludes references (footnotes 2 and 3), and provides very few leads for an individual to educate themselves on air quality issues.

To address this, we request/ recommend:

- Provide context; why is air quality important to the region;
- Use less technical language and spell out acronyms;
- Provide information on the Transportation Control Measures and Emission Control Programs deployed across the region. Given the region's "serious attainment" designation, we would imagine the public to be interested in the region's efforts to reduce emissions.

11. Include discussion of air quality related health risks and benefits

Via the Clean Air Act, the NAAQS for six criteria pollutants were created as safeguards for public health. To be exact, they were created "to protect human health and welfare" from harmful pollutants; ozone having been identified by the EPA as one of the six criteria pollutants. The intent of an MPO's air quality efforts therefore must be with this health goal in mind. However, chapter 6 includes no discussion of human health or why the region should be concerned about VOCs, NOx, or ozone.

Across Texas, asthma (the clearest and most serious health risk tied to high levels of ozone) is the number one reason for school absenteeism. Child asthma rates are also found to be higher at schools with greater proximity to roads. A 2017 American Lung Association study found asthma levels to be higher in Houston than in most other parts of the country and are most concentrated in low-income and minority communities. Asthma rates, and health injustices, are yet another datapoint that must be considered while planning the region's transportation future.

To address this, we request/ recommend:

- Establish programs and goals that address the region's air quality related health issues with a focus on the populations and communities that suffer the brunt of environmental/ transportation-related health harms;
- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

12. As a whole, RTP 2045 (and its amendments) are in conflict with the region's air quality and health goals.

As long as H-GAC transportation planning prioritizes road expansion and single-occupancy vehicle travel over alternative transportation modes, as is done throughout RTP 2045, air quality, health, and road congestion will be horrendous in the region. For example, under the current plan, there will be a 61% population growth over the next 25 years, with a 61% increase in vehicles, and an increase of more than 100,000,000 VMT. When logic is applied, it is evident that a transportation forced to absorb 61% more vehicles would be crippled far beyond the existing congestion rates. RTP 2045 should plan for future population growth using methods that efficiently move the population, which is not with single occupant vehicles. The transportation infrastructure built between now and 2045 is one of the most influential drivers of vehicle ownership.

Again, please remember that the purpose of long-range transportation plans, such as RTP 2045, is to provide the public with a vision for the region. The vision that RTP 2045 presents is increased population, VMTs, congestion without identifying any programs or strategy for improving air quality and health outcomes.

To address this, we request/ recommend:

- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

13. Consider Greenhouse Gasses

The federal air standards do not yet regulate greenhouse gasses (GHG). The question of how and when GHG should be regulated, and added to the air quality standards, has been actively considered by the Clinton, Bush, Obama, and Biden Administrations. With greater concern over the climate crisis, there is reason to believe that GHG will be assessed in the coming years. We saw no references to GHG in Air Quality/ Conformity chapter.

To address this, we request/ recommend:

- Include discussion of GHG sources within the transportation sector;
- Set goals and strategies for reducing GHG emissions.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab (Link) and documentation (Link) explaining its forecasting processes.

For your comment regarding Chapter 6 of the RTP document, H-GAC will consider the addition of more air quality information on this chapter in the next conformity determination.

Also, for our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is our explanation: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

Regarding your comment about the future years, where the VMT goes up and the emissions go down, these emissions reductions are due primarily to fleet turn over and the implementation of new federal standards. The Tier 2 emission standards implemented in 2004 for light duty gasoline vehicles and light duty gasoline trucks show emission reductions of up to 95% in NOx versus Tier 1 vehicles. In addition, the Clean Diesel federal rule, which was implemented in 2006 for heavy duty diesel vehicles, shows an emission reduction of 96% in NOx versus previous standards. The Tier 3 vehicle standards implemented between 2017 and 2025 reduces both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium-duty passenger vehicles and some heavy-duty vehicles. Once fully implemented, smog-forming volatile organic compounds and nitrogen oxides will be reduced by 80% from current levels, particulate matter will be reduced by 70%, and fuel vapor emissions will be driven to near zero levels. For more information on the emission reductions and the implementation timeline for these rules, please refer to the following EPA websites:

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-light-duty-vehicles-and-trucks-and>

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

https://theicct.org/sites/default/files/publications/ICCTupdate_Tier3_NPRM.pdf

Due to all the above emission standards for vehicles, the emissions in the transportation plan are being reduced in the future years due to fleet over turn although the VMT keeps increasing due to population increase.:

The analysis of projects regarding their GHGs emissions is not required for a conformity determination. However, the federal government may require this analysis in the future for project selection and H-GAC will be happy to comply.

For your comment regarding the use of acronyms, H-GAC has a list of acronyms in the conformity website.

See response to you comments on NHHIP Segment 3, SH99, Highway 36A, Hempstead Road and IH 10 W/Inner Katy from TxDOT below
IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the project's inclusion in the 2045 RTP.

SH 99

The current and projected travel demand on SH 99 warrants improvements to ensure continued mobility and safety in the corridor.

36A

36A North: (MPOID 18720) and 36A South: (0912-72-544, MPOID 18719)

At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

Inner Katy:

The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design. TxDOT identified improvement concepts are not expected to affect METRO's implementation of their Inner Katy BRT project. There may, however, be some partnership opportunities that must be considered through both agencies' efforts.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

May Nguyen

Organization

none

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

As a long-time Houston resident, I am concerned that many of these proposed changes include added lanes to the detriment of walking, biking, and transit infrastructure. The above mentioned projects all prioritize car-dependency. I have been here long enough to remember when we expanded I-10 with the promise that it would relieve congestion. The relief was temporary and now I-10 continues to be congested. Urban planners around the world use Houston's I-10 expansion as a cautionary tale of what not to do.

While I appreciate the need to discuss and present the conformity process and results, the lack of information and data presented on the ozone standard and the region's attainment designation is striking. In essence, there are two air quality standards of interest for the Houston-Galveston-Brazoria (HGB) region—one that the region meets (the Texas Commission on Environmental Quality's (TCEQ) Motor Vehicle Emission Budgets (MVEB) for nitrogen oxides (NOx) and volatile organic compounds (VOCs)) and one that it does not (the Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) Ozone standard). The chapter overwhelmingly focuses on the TCEQ MVEB standard; 4 of the chapter's 7 pages are of charts and tables showing the region meeting the emission budgets. Nowhere in the chapter, however, are similar tables, charts or data illustrating the region's nonattainment to EPA's ozone standard. I am concerned that the information presented, and omitted, gives the false impression that the region is successfully meeting air quality standards, when in reality, it is not. This is yet more concerning given that the region's ozone readings are actual—obtained via dozens of air quality monitoring sites across the region—whereas TCEQ's MVEB targets are theoretical and model-derived.

To improve this, I request:

- Provide a clear representation of the region's actual air quality status;
- Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets;
- Include data, charts, tables regarding the EPA ozone standard.

As long as H-GAC transportation planning prioritizes road expansion and single occupancy vehicle travel over alternative transportation modes, as is done throughout RTP 2045, air quality, health, and road congestion will be horrendous in the region. For example, under the current plan, there will be a 61% population growth over the next 25 years, with a 61% increase in vehicles, and an increase of more than 100,000,000 VMT. When logic is applied, it is evident that a transportation forced to absorb 61% more vehicles would be crippled far beyond the existing congestion rates. RTP 2045 should plan for future population growth using methods that efficiently move the population, which is not with single occupant vehicles. The transportation infrastructure built between now and 2045 is one of the most influential drivers of vehicle ownership. Again, please remember that the purpose of long-range transportation plans, such as RTP 2045, is to provide the public with a vision for the region. The vision that RTP 2045 presents is increased population, VMTs, congestion without identifying any programs or strategy for improving air quality and health outcomes.

To address this, I request:

- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

Furthermore, the federal air standards do not yet regulate greenhouse gasses (GHG). The question of how and when GHG should be regulated, and added to the air quality standards, has been actively considered by the Clinton, Bush, Obama, and Biden Administrations. With greater concern over the climate crisis, there is reason to believe that GHG will be assessed in the coming years. We saw no references to GHG in Air Quality/ Conformity chapter.

To address this, I request:

- Include discussion of GHG sources within the transportation sector;
- Set goals and strategies for reducing GHG emissions.

Thank you for your consideration.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single-occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes.

The 2045 RTP is made up of more focused individual plans including the Regional Active Transportation Plan, Regional Safety plan, Regional Coordinated Transportation Plan, Congestion Mitigation Air Quality Plan, to list a few. All these plans can be found in the appendix of the document.

For the next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

Regarding your comment on GHGs, the analysis of projects regarding their GHGs emissions is not required for a conformity determination. However, the federal government may require this analysis in the future and H-GAC will be happy to comply.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Bess Wilhelms

Organization

SELF

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

1. A planned increase is based on the current world in which we live and hopes for 61% increased vehicle use. Ideally, the plans would include planning and creating future outcomes that acknowledge the realities and goals of the region, including less car dependence and more access to transportation, biking, and walking.
2. The changes should keep in account the department of transportation's pause of the i45 expansion, and create new plans.
3. Why have you not taken into account the worsening air standards in the Houston region that endanger all residents, but especially Black and Hispanic residents, and those who live in low-income communities? These racist standards cause greater harm to communities and hurt people throughout the region due to a lack of regard for health and safety.
4. The continued push for expanded car use and access makes cities more dangerous, hotter, and more vulnerable to the realities of climate change which will affect many cities, and especially Houston as hurricanes and incredibly hot summers become more and more frequent. Please think of the world you want to leave for your children. A dirty one that is overheated and inhospitable to human life? Or one that is green, walkable, welcoming, and able to keep them healthy? You have the opportunity to decide.
Houston can be a city that continues to look to the future, and symbolize technology, science and energy, or it can be one destroyed by cars and climate change.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes. The 2045 RTP is made up of more focused individual plans including the Regional Active Transportation Plan, Regional Safety plan, Regional Coordinated Transportation Plan, Congestion Mitigation Air Quality Plan, to list a few. All these plans can be found in the appendix of the document. Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

William Wilson

Organization

self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Regarding the 2045 RTP: This project is not in the best interest of Houston, Harris County, or the Gulf Coast Region. Building more highways (and widening existing ones) at the expense of mass transportation will only make congestion and pollution worse in the long run.

- With a 61% increase in population, the H-GAC assumes a 61% increase in single-occupancy vehicle usage. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide a data based justification used to estimate a 61% increase in vehicle usage?
- The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA's and USDOT's pause of the project.
- Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706, and justification for 18701, 18702, 18703, 18704, and 18705.
- Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets
- Please include discussion of air quality related health risks and benefits

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes. The NHHIP is included in the Regional Transportation Plan, TxDOT only seeks to update the existing project. Texas Central is not responsible for the approval of capital projects, nor is the organization's input required. The Hempstead Road construction will provide traffic an alternate route to US 290.

Regarding your comment on the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs): The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

See response from TxDOT below:

TxDOT Response: IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the project's inclusion in the 2045 RTP.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Jeanette Rash

Submission Method

Online

Organization

Zone One Auto/Fast Tow/Tow and Go Operations Manag

Date Comment Submitted

04/28/2021

Comment

Technology is changing rapidly. The issues of emissions is being addressed by this technology. What needs to be done is to make sure that EV's and autonomous vehicles are planned for in design. As motor carrier traffic increases, so does the technology in them much faster than the travelling public since it is also about efficiency and reducing costs. Planning for this motor carrier traffic is key to the reduction in congestion and reducing crashes as well. We must think about this is planning and not stick to the old way of thinking such as some of the groups that oppose new infrastructure. I 45 is dangerous for all including the neighbors that travel on it, too! It must be fixed in order to keep our economy moving in a positive direction. The price being paid not to do anything is the lives lost every day on I45.

Response

Thank you for your comment. Autonomous and Connected vehicles benefits and drawbacks and their current and future applications is discussed in the current 2045 regional Transportation Plan (RTP) in the Emerging transportation technology section of chapter 3. Building upon the existing discussion in the 2045RTP, technology in transportation will be further developed in the 2050RTP. Your comment will be taken into consideration during the 2050RTP development process. The 2045 RTP includes more focused plans such as Congestion Mitigation Air Quality (CMAQ) Plan, Regional Safety Plan and Congestion Management Process to address the congestion, air quality and safety concerns in our region. For more details please see appendices to the 2045RTP at <http://www.2045rtp.com/documents.aspx>. The 2045RTP projects list include multiple projects on IH 45.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Jennie Rohrer

Organization

Self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets

Please include discussion of air quality related health risks and benefits

Most of the projects include added lanes to the detriment of walking, biking, and transit infrastructure. The above mentioned projects all prioritize car-dependency

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. For your question regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEB): The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

For our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Texas Jackson

Organization

Former Mayor City of Prairie View, Texas

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I am in support of this very important Project. It has the great capacity to be a game changer for the State Of Texas!

Response

Thank you for your input. We will take your comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: Thank you for your input.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Susan Graham

Organization

Stop TxDOT I-45

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

RTP fact sheets published with the 2045 RTP and its amendment state that the HGAC region will experience a 61% population growth and corresponding 61% increase in vehicle ownership over the next 25 years. The transportation infrastructure built between now and 2045 is one of the most influential drivers of future vehicle ownership. The RTP should be addressing future population growth using methods that efficiently and sustainably move the population while also ensuring that households without a vehicle are provided the same transportation equity as vehicle owners.

Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes.

Please provide the source and assumptions made to support the 61% increase in population growth.

Please provide the source and assumptions made to support the 61% increase in vehicle ownership.

Please provide alternative projections of future vehicle ownership that include increases in alternative modes of transportation.

The amendments proposed in the RTP 2045 will increase Vehicle Miles Traveled.

This increase is not in alignment with Houston or Harris County's stated goals to reduce VMT in the region over time. The RTP 2045 is also not in alignment with Houston or Harris County's Vision Zero initiatives.

Please provide alternative designs for these projects that are in alignment with Houston and Harris County's stated goals to reduce VMT over time.

Please provide alternative designs for these projects that are in alignment with Houston and Harris County's Vision Zero initiatives.

The RTP 2045 focus on building roadways as the primary solution for our areas future transportation needs is unsustainable.

SH99 (grand parkway) expansion from 4 lanes to 6 lanes is a perfect example of induced demand and unsustainable transportation paradigm. The growth around this road is facilitating further destruction of the Katy Prairie, an ecosystem critical to manage flooding of regional watershed. The portion of the Grand Parkway proposed for expansion was completed less than 10 years ago. The RTP needs to be investing in transportation infrastructure that will be effective for longer than 10 years.

Please provide an alternative project for SH 99 that includes in addition to the widening of roadways alternative means of transportation infrastructure such as commuter rail and/or BRT that doesn't increase suburban sprawl and further destruction of the Katy Prairie and other natural resources.

Are the Hempstead Road elevated lanes necessary? Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706, and justification for 18701, 18702, 18703, 18704, and 18705.

The METRO Next Inner Katy BRT approved by the voters is a small step in the right direction. However, the TxDOT project to add lanes is not.

Please provide additional justification for the increased lanes beyond the projection of 61% population growth and corresponding vehicle ownership.

All the projects in the RTP 2045 including the proposed amendments that encourage suburban sprawl and ignore the reality of climate change. The proposed 36 A Project is a prime example. It will further the destruction of the Katy Prairie by prior highway projects, especially the Grand Parkway. It will also encourage development in these areas encouraging and increasing sprawl.

Please provide a justification for not prioritizing transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

Please provide discussion of GreenHouse Gas sources within the transportation sector.

Please provide goals and strategies for reducing GHG emissions.

Again, please remember that the purpose of long-range transportation plans, such as RTP 2045, is to provide the public with a vision for the region. The vision that RTP 2045 presents is increased population, VMTs, congestion without identifying any programs or strategy for improving air quality and health outcomes. I expect more than this from my MPO.

Response

The 2045 RTP includes more focused plans such as Congestion Mitigation Air Quality (CMAQ) Plan, Regional Safety Plan and Congestion Management Process to address the congestion, air quality and safety concerns in our region. For more details please see appendices to the

2045RTP at <http://www.2045rtp.com/documents.aspx>.

For the next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

Regarding your comment on GHGs, the analysis of projects regarding their GHGs emissions is not required for a conformity determination. However, the federal government may require this analysis in the future and H-GAC will be happy to comply.

Please see response from TxDOT on your comments regarding SH 99, Hempstead, and Inner Katy projects below.

TxDOT Response:

SH 99

The current and projected travel demand on SH 99 warrants improvements to ensure continued mobility and safety in the corridor.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

Inner Katy:

The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design. TxDOT identified improvement concepts are not expected to affect METRO's implementation of their Inner Katy BRT project. There may, however, be some partnership opportunities that must be considered through both agencies' efforts.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Simone Kern

Organization

Houston resident

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

RTP fact sheets published with the 2045 RTP and its amendment state that the HGAC region will experience a 61% population growth and corresponding 61% increase in vehicle ownership over the next 25 years. The transportation infrastructure built between now and 2045 is one of the most influential drivers of future vehicle ownership. The RTP should be addressing future population growth using methods that efficiently and sustainably move the population while also ensuring that households without a vehicle are provided the same transportation equity as vehicle owners. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide the data-based justification used to estimate a 61% increase in vehicle usage.

2. The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA and USDOT's pause of the project.

3. SH99 (grand parkway) expansion from 4 lanes to 6 lanes is a perfect example of induced demand and unsustainable transportation paradigm. The growth around this road is facilitating further destruction of the Katy Prairie, an ecosystem critical to manage flooding of regional watershed. The portion of the Grand Parkway proposed for expansion was completed less than 10 years ago. The RTP needs to be investing in transportation infrastructure that will be effective for longer than 10 years.

4. The new SH-36A is a disruption of precious continuous prairie land.

5. Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706 and justification for 18701, 18703, 18704, and 18705.

Is alignment of the I-10 Winner Katy corridor required for completion of the METRONext plan?

The proposed amendment does not respect the city of Houston and Harris County's stated goals to reduce VMT in the region over time.

8. Projects in the RTP should be prioritizing safety; expanding lanes and increasing VMTs do not align with Vision Zero initiatives.

Of gravest concern, is that the "Transportation Conformity" Chapter, titled "Air Quality" in the 2045 RTP table of contents, misleadingly represents the region's air quality status.

While we appreciate the need for the chapter to discuss and present the conformity process and results, the lack of information and data presented on the ozone standard and the region's attainment designation is striking. In essence, there are Stop TxDOT I-45 Public Comments for Amendments to the 2045 RTP two air quality standards of interest for the Houston-Galveston-Brazoria (HGB) region—one that the region meets (the Texas Commission on Environmental Quality's (TCEQ) Motor Vehicle Emission Budgets (MVEB) for nitrogen oxides (NOx) and volatile organic compounds (VOCs)) and one that it does not (the Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) Ozone standard). The chapter overwhelmingly focuses on the TCEQ MVEB standard; 4 of the chapter's 7 pages are of charts and tables showing the region meeting the emission budgets. Nowhere in the chapter, however, are similar tables, charts or data illustrating the region's nonattainment to EPA's ozone standard. We are concerned that the information presented, and omitted, gives the false impression that the region is successfully meeting air quality standards, when in reality, it is not. This is yet more concerning given that the region's ozone readings are actual—obtained via dozens of air quality monitoring sites across the region—whereas TCEQ's MVEB targets are theoretical and model-derived.

To improve this, we request/ recommend:

- Provide a clear representation of the region's actual air quality status;
- Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets;
- Include data, charts, tables regarding the EPA ozone standard.

9. The stark disconnect between conformity results (conformity achieved) and actual ozone readings (serious nonattainment) highlights the flaws in the Texas air quality regulatory process. Conformity data presented on pages 5-7 of the Transportation Conformity chapter shows the HGB region easily meeting MVEBs under moderate and serious RFP SIPs for years 2020 through 2045. Meanwhile actual ozone readings from TCEQ air quality monitoring stations (for 2020) continue to designate the region as serious nonattainment. This disconnect demonstrates that the combination of using TCEQ's MVEBs coupled with the EPA's MOVES2014 model is not a proper tool to help Texas MPOs meet the federal ozone standard. TCEQ's MVEBs, shown on pages 5-7, are particularly divorced from reality and unhelpful targets.

To address this, we request/recommend:

- Work with TCEQ and other state MPOs to revise the MVEB process;
- Give less credence to the conformity results especially within planning purposes and when sharing information with the public. The conformity process is complex, confusing, is disconnected from actual ozone levels, and should not be the basis for the region's air quality decisions. Instead, air quality planning and programs should be developed with the end goal of meeting the Federal ozone standard.

10. Rewrite the Transportation Conformity/ Air Quality chapter as a more user-friendly document with the public in mind.

Conformity and the air quality regulatory process is complex and confusing. The way that the Transportation Conformity/ Air Quality chapter is written and presented makes it more so. Throughout the chapter, a number of important acronyms are never spelled out. These include TCEQ, NOx, VOCs. Please remember that the RTP is a public facing document intended to present the region's long range transportation vision. This section is not digestible, lacks context (why do we care about air quality?), excludes references (footnotes 2 and 3), and provides very few leads for an individual to educate themselves on air quality issues.

To address this, we request/ recommend:

- Provide context; why is air quality important to the region;
- Use less technical language and spell out acronyms;
- Provide information on the Transportation Control Measures and Emission Control Programs deployed across the region. Given the region's "serious attainment" designation, we would imagine the public to be interested in the region's efforts to reduce emissions.

11. Include discussion of air quality related health risks and benefits

Via the Clean Air Act, the NAAQS for six criteria pollutants were created as safeguards for public health. To be exact, they were created "to protect human health and welfare" from harmful pollutants; ozone having been identified by the EPA as one of the six criteria pollutants. The intent of an MPO's air quality efforts therefore must be with this health goal in mind. However, chapter 6 includes no discussion of human health or why the region should be concerned about VOCs, NOx, or ozone.

Across Texas, asthma (the clearest and most serious health risk tied to high levels of ozone) is the number one reason for school absenteeism. Child asthma rates are also found to be higher at schools with greater proximity to roads. A 2017 American Lung Association study found asthma levels to be higher in Houston than in most other parts of the country and are most concentrated in low-income and minority communities. Asthma rates, and health injustices, are yet another datapoint that must be considered while planning the region's transportation future.

To address this, we request/ recommend:

- Establish programs and goals that address the region's air quality related health issues with a focus on the populations and communities that suffer the brunt of environmental/ transportation-related health harms;
- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

12. As a whole, RTP 2045 (and its amendments) are in conflict with the region's air quality and health goals.

As long as H-GAC transportation planning prioritizes road expansion and single occupancy vehicle travel over alternative transportation modes, as

is done throughout

RTP 2045, air quality, health, and road congestion will be horrendous in the region. For example, under the current plan, there will be a 61% population growth over the next Stop TxDOT I-45 Public Comments for Amendments to the 2045 RTP

25 years, with a 61% increase in vehicles, and an increase of more than 100,000,000 VMT. When logic is applied, it is evident that a transportation forced to absorb 61% more vehicles would be crippled far beyond the existing congestion rates. RTP 2045 should plan for future population growth using methods that efficiently move the population, which is not with single occupant vehicles. The transportation infrastructure built between now and 2045 is one of the most influential drivers of vehicle ownership. Again, please remember that the purpose of long-range transportation plans, such as RTP 2045, is to provide the public with a vision for the region. The vision that RTP 2045 presents is increased population, VMTs, congestion without identifying any programs or strategy for improving air quality and health outcomes.

To address this, we request/ recommend:

- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy vehicle travel that will worsen air quality.

13. Consider Greenhouse Gasses

The federal air standards do not yet regulate greenhouse gasses (GHG). The question of how and when GHG should be regulated, and added to the air quality standards, has been actively considered by the Clinton, Bush, Obama, and Biden Administrations. With greater concern over the climate crisis, there is reason to believe that GHG will be assessed in the coming years. We saw no references to GHG in Air Quality/ Conformity chapter.

To address this, we request/ recommend:

- Include discussion of GHG sources within the transportation sector;
- Set goals and strategies for reducing GHG emissions.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes.

For your comment regarding Chapter 6 of the RTP document, H-GAC will consider the addition of more air quality information on this chapter in the next conformity determination.

Also, for our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is our explanation: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

For your comment regarding why the VMT goes up while the emissions go down in future years, these emissions reductions are due primarily to fleet turn over and the implementation of new federal standards. The Tier 2 emission standards implemented in 2004 for light duty gasoline vehicles and light duty gasoline trucks show emission reductions of up to 95% in NOx versus Tier 1 vehicles. In addition, the Clean Diesel federal rule, which was implemented in 2006 for heavy duty diesel vehicles, shows an emission reduction of 96% in NOx versus previous standards. The Tier 3 vehicle standards implemented between 2017 and 2025 reduces both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium-duty passenger vehicles and some heavy-duty vehicles. Once fully implemented, smog-forming volatile organic compounds and nitrogen oxides will be reduced by 80% from current levels, particulate matter will be reduced by 70%, and fuel vapor emissions will be driven to near zero levels. For more information on the emission reductions and the implementation timeline for these rules, please refer to the following EPA websites:

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-light-duty-vehicles-and-trucks-and>

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

https://theicct.org/sites/default/files/publications/ICCTupdate_Tier3_NPRM.pdf

Due to all the above emission standards for vehicles, the emissions in the transportation plan are being reduced in the future years due to fleet over

turn although the VMT keeps increasing due to population increase.:

The analysis of projects regarding their GHGs emissions is not required for a conformity determination. However, the federal government may require this analysis in the future for project selection and H-GAC will be happy to comply.

For your comment regarding the use of acronyms, H-GAC has a list of acronyms in the conformity website.

See response to you comments on NHHIP Segment 3, SH99, Highway 36A, Hempstead Road and IH 10 W/Inner Katy from TxDOT below
IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the project's inclusion in the 2045 RTP.

SH 99

The current and projected travel demand on SH 99 warrants improvements to ensure continued mobility and safety in the corridor.

36A

36A North: (MPOID 18720) and 36A South: (0912-72-544, MPOID 18719)

At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

Inner Katy:

The Inner Katy (I10) corridor from I610 to the Central Business District is a high-volume corridor in terms of passenger and freight movement with limited right of way for future improvements. METRO's Inner Katy BRT project will impact the State's right of way and the interstate facility; therefore, TxDOT initiated a corridor study to evaluate the future needs of the State's system in this segment of roadway. TxDOT is coordinating the corridor study with METRO's proposed Inner Katy BRT project to ensure a shared vision that doesn't prohibit future opportunities or improvements. TxDOT's goal is always to avoid, minimize, and only then to mitigate possible impacts to the human and natural environment. TxDOT is committed to on-going stakeholder and public engagement as this project progresses over the years from the planning phase to design. TxDOT identified improvement concepts are not expected to affect METRO's implementation of their Inner Katy BRT project. There may, however, be some partnership opportunities that must be considered through both agencies' efforts.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Charles Thompson

Organization

myself

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706 and justification for 18701, 18703, 18704, and 18705.

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Sabrina Perez

Organization

Stop TXDOT

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I believe TXDOT has proven time and time again that it is an out of touch entity that does not know what is best for houstonians and the way in which we need to travel within our city. We need local oversight over any and all projects transportation projects for our city not only because we deserve the most efficient method of transportation but we also need a system that is conscious of flooding, air pollution and conserves our communities and green spaces. TXDOT has proven it cannot handle that duty please relinquish their oversight to the citizens. We know what's best for our home.

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: Thanks for your input. TxDOT's responsibilities cover the entire State system with more than 80,000 centerline miles of roadway including interstate, US, and State highways, FM roads, frontage roads, and park roads. Each year, the State system carries people and freight more than 203 billion miles. While only 26 percent of the roadways in Texas are State owned, the State system carries 72 percent of all vehicles miles traveled. the Houston District is a microcosm of the State statistics including just under 3,500 centerline miles and more than 100 million miles traveled in fiscal year 2020. This transportation system is vital to the population and economic growth of the region and has national significance in moving people and goods.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Chloe Allen

Organization

Stop Tx Dot

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Hello, my name is Chloe and I'm a resident here in Houston (77092). I'm giving a public comment in order to make my opposition to the proposed 2045 plan heard. For far too long, Houston has emphasized freeway expansion in the name of "reducing traffic". However, the latent effects of this continuous behavior have been a serious detriment to our community. Over the years, freeways in Houston have bred community division, enforced legal segregation AND de-facto segregation, polluted our habitat, and destroyed the homes and businesses of thousands. All the while doing nothing to reduce traffic. I am here to demand NO MORE. If we want to have a better future in Houston, a future that prioritizes the health, safety, and well-being of its residents, then we MUST transition away from these types of projects. It's long overdue. Houston desperately needs more pedestrian methods of transportation, and I sure hope that in 2045, our future holds something more than another expansion/ creation of these massive freeways. The citizens you represent are demanding change, and it's in the best interest of the entire Houston Metro area to come up with new ideas to fit our changing world.

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Katherine Webber

Organization

None/Citizen of Houston

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

As a citizen of Houston, TX I am commenting to express my concern with some of the content of the 2045 RTP and its amendments, specifically around the issue of air quality. You claim that all of the proposed projects will be compliant with EPA standards, but we know that we have some of the worst air quality in the nation. I do not believe that the RTP accurately addresses air quality concerns. I request that HGAC provide a clear assessment of the area's air quality, explain the relationship between the two different air quality standards in question (the EPA's NAAQS ozone standard and TCEQ's MVEB target), and finally I ask that you include discussion of air quality related health risks and benefits. How will the projects proposed affect our air quality and what is HGAC's plan to make sure that the air quality meets EPA standards now and in the future?

Response

Thank you for submitting comments regarding air quality conformity.

For the next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

Regarding your comment about how the national ambient air quality standard (NAAQS) relates to the motor vehicle emission budgets (MVEBs), here is H-GAC's answer: the air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motor Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Juliet Childers

Organization

Citizen

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

This is not a project with the best and future interests of Texas city citizens in mind. It is wholly to suit the desires of developers and people who will not be affected by the gross mismanagement of funding, land, and organization. Moreover, orienting an incredibly expensive project around a dying thing -- cars and fossil fuels -- is a bad plan regardless. STOP THIS. LET CITIZENS DECIDE.

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Benjamin Peters

Submission Method

Online

Organization

Individual

Date Comment Submitted

04/28/2021

Comment

I have a few questions and comments about the RTP amendment.

The population growth projects show 61% population growth to 2045. I don't understand the assumption behind the corresponding 61% increase in vehicle ownership. How is single passenger vehicle ownership corresponding exactly to population increase a given? If Houston area development emphasizes walk-ability and access to transit over the next 25 years, wouldn't demand for single passenger vehicles decrease, or at least not grow at the same rate as population? Conversely if we emphasize single passenger vehicle projects, aren't we essentially ensuring that the associated prediction would happen by inducing demand? Can any of our roadway infrastructure accommodate a 61% increase in single passenger vehicles? That sounds like a number that would completely cripple our transportation infrastructure. When NYC sees population growth, I guarantee there isn't a corresponding 1 to 1 increase in vehicle ownership.

I would also like clarification on the emissions standards and modeling. What are the differences between standards set by the EPA and Texas? Why are we listed as conforming when the EPA is changing our classification to being a serious non-attainer? Why is there a large predicted decrease in regional emissions despite a large increase in vehicle ownership and vehicle miles traveled? Improvements in combustion and stop start technology could conceivably yield maybe a 10-15% reduction in emissions over the next 25 years, but I don't understand the models HGAC is using for emissions. Is electric vehicle adoption included in the projections? I'm also confused as to how we track total emissions as a region vs just from transportation. Can you clarify some of these differences? I also saw no reference to greenhouse gases, are these incorporated somewhere? There also seems to be no discussion of the regions health costs and effects due to pollution. This part of the document is confusing and difficult to understand from a general public perspective.

As for the projects themselves, I'm disappointed to see that most of them seem to be focused on single passenger vehicles to the detriment of transit, bicycling, and walking. I want to see this body take a more holistic view of development and transportation. SH99 was completed less than 10 years ago and it already needs a major lane expansion? How do Hempstead road elevated lanes relate to a high speed rail project?

For us to be a region that is more livable, economically, and environmentally sustainable, we have to reduce our vehicle miles traveled. We can accomplish this by encouraging walk-able development, and prioritizing other transportation modes in our planning process beyond simply single passenger vehicles. I would like our RTP process to reflect this.

Response

The 2045 RTP is made up of numerous plans including the Regional Active Transportation Plan, Regional Safety plan, Regional Coordinated Transportation Plan, Congestion Mitigation Air Quality Plan, to list a few. All these plans can be found in the appendix of the document <http://www.2045rtp.com/documents.aspx>.

Regarding your question on why the vehicle emissions decreases as the VMT increases: These emissions reductions are due primarily to fleet turn over and the implementation of new federal standards. The Tier 2 emission standards implemented in 2004 for light duty gasoline vehicles and light duty gasoline trucks show emission reductions of up to 95% in NOx versus Tier 1 vehicles. In addition, the Clean Diesel federal rule, which was implemented in 2006 for heavy duty diesel vehicles, shows an emission reduction of 96% in NOx versus previous standards. The Tier 3 vehicle standards implemented between 2017 and 2025 reduces both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium-duty passenger vehicles and some heavy-duty vehicles. Once fully implemented, smog-forming volatile organic compounds and nitrogen oxides will be reduced by 80% from current levels, particulate matter will be reduced by 70%, and fuel vapor emissions will be driven to near zero levels. For more information on the emission reductions and the implementation timeline for these rules, please refer to the following EPA websites: <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-light-duty-vehicles-and-trucks-and> <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles> https://theicct.org/sites/default/files/publications/ICCTupdate_Tier3_NPRM.pdf

Due to all the above emission standards for vehicles, the emissions in the transportation plan are being reduced in the future years due to fleet over turn although the VMT keeps increasing due to population increase.

Regarding your comment on the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is H-GAC 's answer: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet

federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard. Regarding your question about GHGs: the analysis of projects regarding their GHGs emissions is not required for a conformity determination. However, the federal government may require this analysis in the future for project selection. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Michael Moritz

Organization

self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

The proposed amendment to the 2045 RTP represents the continuation of failed transportation policy. This plan has the opportunity to determine future mobility outcomes, and yet RTP factsheets indicate an assumed 61% increase in vehicles with a 61% increase in population. The RTP should be including projects that prevent such an unsustainable increase in vehicles by moving future residents more efficiently via busses and trains. Please provide data driven justification for the estimated 61% increase in vehicles.

Segment 3 of the NHHIP should not be included in the proposed amendment due to the FHWA and USDOT instructing TXDOT to pause work on the project. Why is segment 3 included in the amendment?

SH99 from I-10 to Holzwarth road was completed less than ten years ago and there is already a proposed expansion project. The Grand Parkway exacerbates destruction of critical natural flood control watersheds in the Katy Prairie. Expanding this toll road less than ten years after construction is proof of our failed transportation strategies. Furthermore, this project does not improve walk-ability in and around the intersections of surface streets and SH-99. The RTP needs to be directing funds to projects that will be effective for longer than ten years.

I will echo the Katy Prairie Conservancy's comments on SH36A. This project is ambiguous and problematic. We must protect our prairieland ecosystems and watersheds. Please provide justification for this roadway.

Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706 and a diagram indicating how proposed project #18706 is required to accommodate the Texas Central project. Additionally, please provide traffic model justification for projects 18701, 18703, 18704, and 18705.

Based on the Chapter 6: Air Quality Conformity document, the projects in the 2045 RTP and the proposed amendment will increase total vehicle miles traveled by roughly 50% over the next 25 years. This prediction diverges from the City of Houston and Harris County's stated intent to reduce total VMTs in our region. The majority of the residents in the HGAC area live in Harris county. Why does the RTP not adopt the intentions of the governing body that oversees the majority of residents in the area? Please provide correspondence with COH and Harris county planners that show they align with the RTP's proposed VMT increase over time.

On the topic of increasing VMTs, statistically speaking more VMTs and more vehicle lane miles will result in more crashes in our region. The city of Houston has signed on to the Vision Zero initiative, as has the Texas Transportation Commission. Please explain how increasing VMTs and lane miles in our region will reduce crashes and traffic fatalities. Reminder: The TTC has pledged to reduce traffic fatalities to 50% of current levels by 2030.

The interaction of the TCEQ's MVEB and the EPA's NAAQS "Serious non-attainer" standard is confusing. Please provide a clearer explanation of the Houston-Galveston-Brazoria region's annual emissions non-attainment under the NAAQS standard and how the TCEQ's Motor Vehicle Emissions Budget falls within the EPA limits.

Please explain how with a sizable increase in VMTs our region will see a substantial decrease in NOx and VOC over the next 20 years and why after 20 years emissions will rise again. (Referring to Chapter 6, air quality conformity)

In summary, please provide the public with the following information:

1. data driven justification for the estimated 61% increase in vehicles
2. Justification for inclusion of NHHIP Segment 3 in the proposed amendment
3. Explanation why SH36A is a needed roadway, and the final footprint of the road
4. Documented input from Texas Central on their involvement and approval of project #18706, as well as a diagram of the Texas Central railway project ROW and the proposed Hempstead Road managed lanes project (18706) illustrating the need for 18706.
5. Justification for projects 18701, 18703, 18704, and 18705.
6. Documented correspondence with COH and Harris county planners that show they support the RTP's proposed VMT increase over time.
7. Data behind how an increase in total VMTs can reduce traffic fatalities, something TxDOT (under the direction of the TTC) has pledged to do.
8. A clearer explanation of the relationship between EPA regional non-attainer emission standards and the compliance of transportation emissions

projections within the EPA ceiling.

9. Explanation of how emissions can be reduced with an increase of VMTs over time.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single-occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes.

The NHHIP is included in the Regional Transportation Plan, TxDOT only seeks to update the existing project. Texas Central is not responsible for the approval of capital projects, nor is the organization's input required. The Hempstead Road construction will provide traffic an alternate route to US 290.

As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

City of Houston and Harris County Planners are part of the subcommittees and Transportation Advisory committee that provides guidance and advice to H-GAC staff on a regular basis. You can see City of Houston's comments on proposed amendments to the 2045 RTP (letter) posted on our website at <https://www.h-gac.com/getmedia/c2ad2cd0-2a93-439e-9ed9-c29d3c5ba72a/COH-Comments-RTP-Amendments-4-16-2021.pdf>.

Regarding your comment on the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is H-GAC's answer: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motor Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air pollution and health effects.

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<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

https://theicct.org/sites/default/files/publications/ICCTupdate_Tier3_NPRM.pdf

Due to all the above emission standards for vehicles, the emissions in the transportation plan are being reduced in the future years due to fleet over turn although the VMT keeps increasing due to population increase.

Please see response to your comment on NHHIP, SH 99, Highway 36A, and Hempstead Road projects from TxDOT below.

IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the project's inclusion in the 2045 RTP.

SH 99

The current and projected travel demand on SH 99 warrants improvements to ensure continued mobility and safety in the corridor.

36A

36A North: (MPOID 18720) and 36A South: (0912-72-544, MPOID 18719)

At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Mario Castro

Organization

Houston Citizen

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

We Houstonians request and demand more Metro Rail lines, and more rapid bus services. Our current public transportation lines do not cover enough ground and it makes no sense that the rapid Silver Line was placed in the wealthy predominantly white area (galleria). What we Houstonians are need is all current Metro Rail lines (red, green, and purple) to connect to our airports. Additionally we would like to propose a new Metro Rail or Rapid Bus Service line to connect Maine Medical Plaza@South Main Street to Trotter (JT) Park@Little York Road. This potential route could use Alt 90, 69th Street, and Wayside drive as its route. This new line would be a dream come true for all Houstonians, as it covers lots of ground and connects many neighborhoods. I hope you will consider this proposal that would move 1000s of Houstonians around the city and cut transportation costs for our citizens.

Response

Needs Response from METRO

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Garrett Line

Organization

NA

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

With a 61% increase in population, the H-GAC assumes a 61% increase in single-occupancy vehicle usage. Projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide a data based justification used to estimate a 61% increase in vehicle usage?

The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA's and USDOT's pause of the project.

Has Texas Central approved the Hempstead Road elevated managed lanes project? Why would we build a highway right next to US290? Please provide record of input from Texas Central on project #18706, and justification for 18701, 18702, 18703, 18704, and 18705.

Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets

Please include discussion of air quality related health risks and benefits

Response

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The NHHIP is included in the Regional Transportation Plan, TxDOT only seeks to update the existing project. Texas Central is not responsible for the approval of capital projects, nor is the organization's input required. The Hempstead Road construction will provide traffic an alternate route to US 290.

Regarding your comment on the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is H-GAC's answer: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air pollution and health effects.

Please see response to your comment on NHHIP and Hempstead Road projects from TxDOT below.

TxDOT Response: "IH 45, Segment 3 (North Houston Highway Improvement Project)

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Hempstead

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Kristina Ronneberg

Organization

Self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Dear Houston-Galveston Area Council,

Thank you for the opportunity to comment. I was disappointed to read the updated "Air Quality" (as it is titled in the RTP 2045 table of comments)/ "Transportation Conformity" chapter as it misrepresents the region's air quality status and provides no strategy for how the region must address the serious nonattainment ozone designation.

I request for the following issues to be addressed:

1. Currently, discussion of conformity and the region's ability to "meet" TCEQ's MVEBs accounts for the majority of the Air Quality chapter. For example, 3 pages (of a 7 page long) document are dedicated to charts and tables on how the region meets MVEBs while no similar data, charts, or tables regarding the NAAQS ozone standard are included. This imbalance of information gives the reader the false impression that the region meets federal air quality requirements, when in fact, it does not. This should be corrected by providing more information on the NAAQS ozone standard. At a minimum, the region's ozone design-value chart should be included.
2. The HGB region is designated by the EPA to be in "serious nonattainment" for the criteria pollutant, ozone. This designation demands a strategy for how the region will improve its air quality. Yet, I see no information or plans to this effect within any part of the RTP, including the Air Quality Chapter. Please provide a strategy, including programs, policies, and goals, for how the region intends to meet attainment for the federal 2008 and 2015 ozone standards.
3. The NAAQS were created to protect public health, yet Chapter 6 includes no discussion of air quality related health risks and concerns for the region. Please address health, in particular asthma and respiratory ailments, within the Chapter. The discussion/ analysis should include information on the relationships between asthma rates and proximity to transportation infrastructure and how asthma is being addressed as an environmental justice issue.

Response

Thank you for submitting comments regarding air quality conformity.

For your comment regarding Chapter 6 of the RTP document, H-GAC will consider the addition of more air quality information on this chapter in the next conformity determination.

Also, for our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

Environmental justice issues regarding air pollution are not required to be included in the conformity report. However, the 2045 RTP has an environmental justice program where you are invited to participate [WEBSITE](#)

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Marlisa Briggs

Submission Method

Online

Organization

North Houston Association

Date Comment Submitted

04/28/2021

Comment

Thank you for the opportunity to provide public comment on H-GAC's 2045 Regional Transportation Plan (RTP). The RTP is an important regional planning tool, focusing on regional mobility, congestion mitigation, quality of life, safety and efficient movement of goods. We greatly appreciate the work undertaken to produce such a plan.

We enthusiastically support the following proposed amendments to the 2045 RTP:

- 18719, 18720 – 36A
- 18723 – 18726 – SH 99 Widening
- 18727 – Widening of Frontage Roads
- 16328 – Existing NHHIP Segment 3
- 18701 – 18706 – Hempstead Road Improvements

36A – Although outside of the NHA service area, this project will improve mobility in the region. This route provides an efficient and expanded transportation and freight route from Port Freeport to US 290. In addition to improving daily mobility, the project also improves safety since State Highway 36 is a primary evacuation route from southern Brazoria County.

SH 99 Widening – SH 99 is a highly-utilized highway in north Houston and is in need of widening in the segments outlined from four to six lanes. This widening will help mitigate congestion as well as support operational efficiency.

Widening of Frontage Roads East of Hardy Toll Rd to East of Aldine Westfield – this frontage road is frequently congested, and direct connectors between Beltway 8 and the Hardy Toll Road are much needed.

Existing NHHIP Segment 3 – Although outside of the NHA service area, the completion of Segment 3 of the North Houston Highway Improvement Project makes possible further improvements northward in this much-congested corridor. Commuters in north Harris County and Montgomery County need improved access to the major business centers in Houston, including dual-directional HOV lanes which improves mass transit options. Additionally, I-45 is the primary evacuation route, which is a critical safety issue.

Hempstead Road Improvements – Includes reconstruction, construction of managed lanes and the addition of a transit lane in each direction.

As an advocate for issues in northern Harris and Montgomery Counties, the North Houston Association is actively involved in regional mobility issues, and we appreciate the opportunity to provide input on the H-GAC 2045 RTP.

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: Thank you for your input.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Trent Epperson

Organization

City of Pearland

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

City of Pearland comments regarding the proposal from TxDOT to add the SH35 Corridor from I-610 to SH-99 to the H-GAC Regional Transportation Plan (RTP)

April 27, 2021

On April 26, 2021, TxDOT representatives provided a briefing on the SH35 Corridor (I-610 to Future SH99) to the Pearland City Council. The Council provided input and discussion on the proposed freeway. The general sense of the discuss was there was not a need for the project locally or regionally and that the detrimental impacts to the community outweigh any mobility benefits.

Based on Council and staff input, the City of Pearland is submitting the following comments regarding the proposed RTP Amendment that will add the SH35 Corridor project to the RTP:

1. An elevated freeway is not an option for Pearland along the existing BNSF rail corridor due to its impacts on:

- a. Existing Development – The SH35 and Mykawa Road corridors are high value employment and investment areas with room for additional growth. The freeway will cause permanent economic disruption by eliminating much of this value and negatively impacting future growth.
- b. Aesthetics – Pearland has long-range plans for the SH35 corridor and revitalization of the Old Town area already underway that are not compatible with and will be diminished in value with an adjacent freeway.
- c. Long term detrimental impacts – Long term impacts to other communities that were divided by similar freeways after the areas were developed irreparably ruptured those communities (see communities divided by the Hardy Tollroad, SH59, I-10, etc.). We do not want that for Pearland. The benefits are for communities to the south while the detrimental impacts to Pearland are significant and unlikely to be overcome
- d. Noise Pollution – The City of Pearland worked with BNSF Railroad for a decade and spent over \$40M building three overpasses and three at-grade intersection with supplemental safety measures to implement a “Quiet Zone” throughout Pearland where the trains do not use their horns within our community. A freeway, elevated or not, will bring constant noise levels approaching the volume of train horns.

2. Pearland questions the need for a freeway at all (elevated or other) and the assumptions the growth projections are based upon are outdated and have flaws, such as:

- a. SH35 Corridor where it has already been expanded to six lanes in Pearland (BW8 to FM518) does not have am or pm peak capacity of Level of Service issues.
- b. The need for the freeway is based on the antiquated hub and spoke Central Business District (CBD) model. This model served the transportation needs of outlying areas reaching the CBD to the detriment of the communities it divided. The Houston metro area today has many business districts and destinations and is not in need of an additional freeway into downtown, especially where the necessary right-of-way was not preserved. Additionally, many corporations located in Houston are moving permanently to a work from home model in response to the COVID-19 pandemic and the evolving real estate market downturn.
- c. The growth percentages (2018-2045) to the south of Pearland are flawed and skewed due to the low existing population numbers in the Hastings Oilfield area. Pearland staff requested TxDOT provide actual number of population growth and to present that data to City Council however only the percentages were used.
- d. The growth projections do not consider the changing commuting patterns and the future of work for 2045. Where does H-GAC get their data on where people work? They should be engaging with developers to have a better understanding of where people will be working in the future and therefore be able to better determine where they will live and the resulting commuting patterns.
- e. The much better option for connecting the SH35 Bypass in Alvin to the freeway system is completing SH99 to I-45. The benefits are a shorter route (less costs) and the right-of-way has been preserved or traverses open land with little to no development minimizing the disruptions to businesses and residents.

3. Existing Road Capacity Needs – Pearland has multiple existing State roadways that as of today, not 25 years into the future, have a lack of capacity, very high congestion, and safety issues. These roadways were identified in the Northern Brazoria County/Pearland Subregional Planning Initiative (SPI) conducted by H-GAC themselves to be the highest priority roadways in our area. The SPI include Pearland, Manvel, Iowa Colony, and Alvin. TxDOT should prioritize the use of their limited resources to address the corridors that have existing needs as identified in the SPI over a future freeway that has no clear sub-regional or regional need, only considers the needs of one community, has no available corridor to be built, and was not a priority in the SPI.

- a. FM518 Widening (SH288 to FM865 (Cullen Pkwy) – No. 1 priority from the SPI. TxDOT has started design and land acquisition. Construction is scheduled to start in 2025. Need to ensure this project is fully funded and stays on schedule. It has already slipped from 2024.
- b. SH35 Widening (FM518 to Alvin) – No. 2 priority from the SPI. This undivided high-speed corridor has the most significant safety issues in Brazoria County. No planning, design, or environmental clearance efforts have been started by TxDOT.
- c. FM518 Widening (FM865 to SH35) – No. 5 priority from the SPI. TxDOT has started the environmental work and design but construction funds have not been allocated.

- d. FM518 Widening (McLean to Walnut) – This short segment of FM518 is part of the No. 5 priority from the SPI but has been left out of the TxDOT project and environmental document due to the existing narrow right-of-way. The segment includes the intersection with SH35 and needs to be further evaluated to see if a one-way pair option is viable by using Walnut Street or other options should be considered. Instead of incorporating this analysis into the overall FM518 project, TxDOT has left this evaluation to the City. The City has requested funds from H-GAC for the analysis.
- e. FM518 Widening (SH35 to Friendswood) – Although not identified and studied at the time the SPI was conducted, this segment of FM518 continues to experience high commercial/retail growth leading to traffic volumes surpassing volumes on the No. 5 SPI priority segment of FM518 between FM865 and SH35. No planning, design, or environmental clearance efforts have been started by TxDOT.
- f. FM1128 Widening (FM518 to SH6) – No. 4 & 6 priorities from the SPI. This corridor will eventually connect SH6 to BW8, when the City completes the segment north of FM518. No planning, design, or environmental clearance efforts have been started by TxDOT for the FM518 to SH6 segment.
- 4. There will be little to no Evacuation Route benefits to Pearland, communities to the south, or the region because the SH35 corridor will just put evacuation traffic onto existing routes that are already inadequate for evacuation (BW8, I-610, I-45)
- 5. Crash Trends – The freeway will not solve the crash trends on the existing SH35 or Mykawa Road. To address, TxDOT should widen and implement safety measures in the areas with the highest crash rates. Where SH35 has been widened and safety measures have been implemented in Pearland, the crash rates are relatively low.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input.

TxDOT Response: SH 35

The need for SH 35 improvements from Dixie Drive and continuing south to future SH99 is just beginning. The Texas Department of Transportation has scrapped the previous plans for S 35 and is starting over in the feasibility process. Our process for corridor studies involves both a quantitative and qualitative process that features extensive stakeholder and public engagement and input before finalizing a proposed improvement concept. We believe including the project in the 2045 RTP puts the public on notice that we intend to study the corridor because this corridor is vital to the transportation system. Improvements are anticipated to move people and goods more reliably.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Ben Stickney

Organization

Self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

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Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets

Please include discussion of air quality related health risks and benefits

Response

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Regarding your comment on the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is H-GAC's answer: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air pollution and health effects.

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Hempstead

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Kathleen Christman

Organization

self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

My question on every single one of these projects is: where is the water going to go?

Twenty years ago, Sugar Land still had rice paddies, prairies, and marshes, and Meyerland didn't flood. Now, where there were once open fields that would take the water in heavy rain, there is concrete that pushes the water into people's homes. So, while TXDOT paid one price to build all those roads, we all pay a much higher price when HUD has to come in a pay to rebuild homes and businesses, as they have so many times in the past decade. There are too many million dollar homes in Houston that started out as \$300,000 homes, but have been rebuilt three times this century, due to flooding. The people who live in homes that didn't used to flood but now do flood obviously have paid and suffered the most, but we all pay when HUD subsidizes rebuilding, and we all pay for it in higher flood insurance premiums. So, I'd like to know if you could include the trauma tax in the original cost estimates for these projects.

I agree with everything that Katy Prairie Conservancy has stated. Further, I am interested how paving over prairie here will affect flooding in other parts of the region. What has been done to study how these new roads will affect flooding in heavy rain? Has anything been done to minimize or negate the negative effects?

What is being done to compensate home owners who are not in the direct path of the new roads, but whose homes will nonetheless be destroyed by flooding as a direct result of replacing flood control areas with highways?

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Samuel Russek

Organization

none

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Joyce Tajonera

Submission Method

Online

Organization

Houston Resident

Date Comment Submitted

04/28/2021

Comment

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Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the projects inclusion in the 2045 RTP. "

Hempstead

The Hempstead project from I-610 to BW 8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Fabián Ramirez

Organization

Meshed Consulting LLC

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

This is genocide. Sustainable development is what the minority communities in Houston's downtown wards need. Stop pushing minorities to the suburbs. I am tired of your shit. It stinks.

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your opinions.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Myles Castellanos

Organization

Self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

The proposed amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA and USDOT's pause of the project. It is a disruption of precious continuous prairie land.

Response

Thank you for comment on the Regional Transportation Plan and Air Conformity. The NHHIP is included in the Regional Transportation Plan, TxDOT only seeks to update the existing project. H-GAC strives to balance in all modes of transportation while promoting health, safety, mobility, and economic growth. Please see response regarding NHHIP Segment- from TxDOT below.

TxDOT Response: IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the projects inclusion in the 2045 RTP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Bridget Lois Jensen

Organization

N/A

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I echo others who raise questions about how the modeling can show a decrease in emissions when building more highway capacity projects and an increase in vehicular miles.

I think it's interesting that Hempstead Road elevation is needed to accommodate the Texas Central High Speed Rail. I know there has been a lot of discussion about the rail project, but I've never understood why there wouldn't be the option of expanding existing rail ROW and having the Houston terminus at a Union Station, restored to its original use as a rail station. The Astros go back to the Astrodome (which has higher seating capacity than Minute Maid) and Union Station becomes similar to Union Station in St. Louis. As for elevating Hempstead Highway, elevated freeways in other parts of town have been locations where unhoused people seek shelter and then nearby businesses and residents get upset. Is another elevated roadway parallel to the existing and recently expanded 290 really what this area needs or wants?

The creation of SH36A seems to be yet another belt around Houston that encourages car-dependency and sprawl, leading to worsening air and increased flooding. The Brazos River has experienced frequent flooding already so adding a road such as SH36A would bring added development and added flooding, putting that development at risk.

As for widening SH99, being a tollway, this would not help people who have limited incomes. Actually, such people don't have cars and are looking for other modes of transportation. What alternatives are there in this corridor other than widening the tollway?

I know many of my questions appear rhetorical, but they are sincere.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input.

For your comment regarding the regarding emissions reductions, here is our response: Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

Regarding your comment about why VMT increases while emissions decrease in future years, these emissions reductions are due primarily to fleet turn over and the implementation of new federal standards. The Tier 2 emission standards implemented in 2004 for light duty gasoline vehicles and light duty gasoline trucks show emission reductions of up to 95% in NOx versus Tier 1 vehicles. In addition, the Clean Diesel federal rule, which was implemented in 2006 for heavy duty diesel vehicles, shows an emission reduction of 96% in NOx versus previous standards. The Tier 3 vehicle standards implemented between 2017 and 2025 reduces both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium-duty passenger vehicles and some heavy-duty vehicles. Once fully implemented, smog-forming volatile organic compounds and nitrogen oxides will be reduced by 80% from current levels, particulate matter will be reduced by 70%, and fuel vapor emissions will be driven to near zero levels. For more information on the emission reductions and the implementation timeline for these rules, please refer to the following EPA websites:

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-light-duty-vehicles-and-trucks-and>

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

https://theicct.org/sites/default/files/publications/ICCTupdate_Tier3_NPRM.pdf

Due to all the above emission standards for vehicles, the emissions in the transportation plan are being reduced in the future years due to fleet over turn although the VMT keeps increasing due to population increase.

Please see responses to your comments on Hempstead, Highway 36 A and SH99 projects below.

TxDOT Response:

Hempstead

The Hempstead project from I-610 to BW8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement. Texas Central does not have authority to perform or approve a TxDOT project. TxDOT has had multiple meetings with the Texas Central team. The Texas Central team will continue to be consulted as a stakeholder during the Hempstead feasibility study.

36A North: (MPOID 18720) and 36A South: (0912-72-544, MPOID 18719)

At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

SH 99

The current and projected travel demand on SH 99 warrants improvements to ensure continued mobility and safety in the corridor.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Stephen Gast

Submission Method

Online

Organization

Katy Prairie Conservancy, Texas Audubon Society, H

Date Comment Submitted

04/28/2021

Comment

Re: 2045 RTP

Where is the support that we have had from the judge's office in the past. The map showing the study area for HWY 36A is too narrow and forces focus onto KPC lands. Even worse - a tentative and completely wrong illustration shows a possible route for 36A directly across lands that contain roosting areas for thousands of cranes, ducks and geese not to mention countless other forms of wildlife that are rapidly disappearing elsewhere in the HGAC area. Judge Emmet, Mayor Turner, Harris Co. councilmen, and many public officials in Waller County have all expressed support for the Katy Prairie Conservancy areas to be a hugely valuable future environmental asset to the region. Remember when the same economic development entities called 36A originally the 'Prairie Parkway'? Destruction of the most valuable portion of the last remnants of the Katy Prairie are what is being targeted by this proposal as it currently appears. This terrible abuse of public responsibility for quality of life must be addressed by the current HGAC transportation committee. This cannot stand. Only the shortage of comment period time left precludes me from being able to rally a small army of outraged citizens.

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Felipe Sanchez

Organization

Self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

What is being done to address the serious non-attainment classification from the EPA? It seems the RTP is cherry picking data, specifically from the TCEQ's air quality models to justify its freeway expansions when in fact, we are not meeting the ozone level standards at federal levels.

And why aren't EVs and public transport options being considered when predicting vehicle usage? By 2045, it's predicted that there will be a 61% increase in population growth AND vehicle ownership? The two aren't related, and frankly illustrates a lack of imagination in H-GAC. Other equally serious concerns are the SH99 expansion creating induced demand effectively rendering it pointless, SH-36A will destroy more of our increasingly scarce prairie land which serves as a natural flood prevention watershed, and an elevated hempstead road becoming redundant when highway 290 sits practically right next and parallel to it.

As a whole, RTP 2045 (and its amendments) are in conflict with the region's air quality and health goals, and I demand a more transparent and easy to read document for your Air Quality Conformity document. Why is it so confusing? One shouldn't have to google any acronyms if they're included in the document.

Response

Thank you for submitting comments regarding air quality conformity. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects. For your comment regarding the use of acronyms, H-GAC has a list of acronyms in the conformity website.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Itay Porat

Organization

Houston resident

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

1) Bikeways that are not protected from vehicle traffic should not count towards the proposed goal. It is criminally negligent to allow for continued construction (or designation) of unprotected bikeways meanwhile touting public safety as a goal. These types of facilities include shared use paths, signed shared roadways, signed shoulders and 'unidentified', which account for 93% of all proposed bikeway miles. Bike lanes should be separated from vehicle roadways for the same reason sidewalks are separated – cars pose life threatening risk to both bicyclists and pedestrians. Please provide an adjusted proposed bikeway miles figure based solely on bike paths that are safe for people to travel on (Executive Report page 6).

2) The two performance measures outlined in Figure 2.1 for Goal 5 (Conserve & Protect Natural & Cultural Resources) are not adequate in addressing the risks to environmental health highlighted throughout the plan (particularly Resiliency and Natural Environment sections). Reducing emissions is important but is not relevant to protecting critical ecosystems such as prairie, wetlands, forests and farmland. Reducing impacts requiring mitigation needs to be elaborated on if to be used as a performance measure. Table 3-4 does not offer any performance measures that help meet Goal 5. This is important because of proposed projects like the expansion of SH36 and SH99, which threatens sensitive prairie land. Please provide measurable, concrete parameters for conserving natural land and addressing potential threats to ecosystem loss.

3) The role of roadway expansion as an enabler of regional sprawl and increased flooding is not discussed. H-GAC is a regional body and should be the one to consider the region's most severe issue of flooding and coastal inundation as it relates to transportation planning. Is there an analysis of how proposed facility expansion will impact or contribute to regional growth projections and increase in impervious cover?

4) NHHIP projects should be removed from 2045 RTP due to the ongoing investigation and project hold placed by FHWA.

5) Please provide total values for Corridor category columns in Table 5-4.

6) Climate change is hardly mentioned throughout the report. Furthermore, increase in greenhouse gas (GHG) emissions due to projected increase in vehicle miles traveled is not discussed. Please include a discussion of construction and vehicular related GHG emissions.

7) The currently proposed NHHIP will merge I-69 and I-45 in downtown Houston. Has any analysis been done on this type of merging for regional hurricane evacuation since I-45 is to serve as a main evacuation corridor?

Response

Needs TxDOT's response H-GAC Response: Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP. The NHHIP is included in the Regional Transportation Plan, TxDOT only seeks to update the existing project. More information on North Houston Highway Improvement Project can be found at <https://www.txdot.gov/inside-txdot/get-involved/about/hearings-meetings/houston/020921.html>.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Tom Lambert

Organization

METRO

Submission Method

Email

Date Comment Submitted

04/27/2021

Comment

[View Attached Letter](#)

Response

A response from TxDOT is attached



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AWARD WINNER**

Mission Statement

*"Provide safe,
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April 27, 2021

Mr. Craig Raborn
Director Transportation Planning
Houston-Galveston Area Council
P.O. Box 22777
Houston, Texas 77227-2777

RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan

Dear Mr. Raborn,

On behalf of the Metropolitan Transit Authority, I am providing the following comments on Proposed Amendments to the 2045 Regional Transportation Plan.

IH 10W Studemont to Houston Ave

METRO's proposed Inner Katy Busway was selected and funded by the Transportation Policy Council as part of its most recent Call for Projects. As the highest ranked major transportation investment in the Call, this project will continue access for transit buses to Downtown and other destinations inside the 610 West Loop from three major transit corridors: IH 10 West, US 290 and the Galleria Bus Rapid Transit.

The Inner Katy Busway was previously approved by TPC as part of the Regional Transportation Plan (TPC) and is already identified in the current Transportation Improvement Program. It was part of the extensive public outreach conducted during the development of the voter approved METRONext referendum.

It is a time sensitive project and will provide significant benefit to all transit riders using the Northwest Transit Center where transit patrons using express transit in one corridor may connect to another, greatly expanding their potential destinations. It will also expand express transit services to neighborhoods along the Inner Katy corridor. Consequently, METRO is aggressively advancing this high priority project. This work includes



continued public engagement on the development of the necessary design and engineering work to fulfill environmental analysis leading to federal approval for construction.

METRO agrees that TxDOT should examine alternatives to mitigate the potential for main lane flooding and opportunities to provide HOV Lane capacity beyond that provided by METRO's Inner Katy Busway. However, these steps will require significant analysis and additional time as TxDOT address concerns that are far beyond the scope of the Inner Katy Busway approved by TPC and by METRONext voters. METRO is, therefore, concerned that TPC approval of TxDOT's IH 10W project may unnecessarily delay METRO's implementation of the Inner Katy Busway.

METRO requests that its project (the Inner Katy Busway) be retained in the Regional Transportation Plan and Transportation Improvement Program as a project of separate and independent benefit.

METRO further requests the TPC delay or provide only conditional approval of TxDOT's IH 10W project from Studemont to Houston Avenue until METRO has had the opportunity to consult with TxDOT and the Federal Transit and Highway Administrations to establish that its currently approved project will be permitted to advance, receive needed environmental approvals, and move to early implementation.

Hempstead Road and IH 610 Managed Lanes

METRO shares the concerns voiced by the City of Houston and other commenters that the Purpose and Need for the elevated managed lanes proposed for Hempstead Road and IH 610W are not well established and that TxDOT has not demonstrated community support for their proposals.

We also share the concern that previous planning activity for these two proposals was conducted so long ago the recommendations from this work may not be consistent with changes in land use and travel over the last 15-20 years.

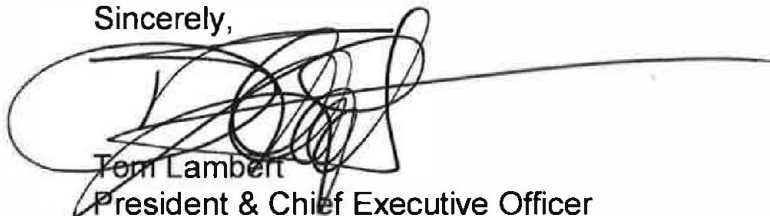
METRO also believes that historic traffic congestion on the West Loop and US 290 may be relieved by the soon to be completed IH-69/IH-610 West Loop interchange and the expansion of US 290.

The two proposed express lane projects do not seem to advance the vision for High Capacity Transit as described in the recently approved 2045 Long Range Plan. The proposed at-grade bus lanes on Hempstead could allow for some improvement in local transit services but don't reflect the level of express transit service provided today on US 290 or identified in the new 2045 RTP.

It is METRO's desire to work with TxDOT and our regional partners to conduct the planning work needed to clearly identify the transportation needs in these corridors and the alternative ways to address them. Working together, we can achieve broad community support for the development and implementation of any recommendations.

Attached you will find comments on a list of METRO projects in the 2045 RTP related to the air quality conformity determination. This list is the result of ongoing discussions between METRO and H-GAC. Per those discussions, METRO will send a letter requesting the addition of projects to the 2045 RTP that do not impact air quality conformity. I appreciate the support of your staff in developing the list and comments.

Sincerely,



Tom Lambert
President & Chief Executive Officer

cc: Tom Jasien, Deputy CEO
Clint Harbert, Vice President – System & Capital Planning
Alan Clark, Chief Strategy Officer
Albert Lyne, Director – Grant Programs
Vishu Lingala, H-GAC

ANALYSIS YEAR	PROJECT COST (M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H- GAC on 4/20/21
2030	\$1.00	Delete. Included in Inner Katy project #11473.	OK will be deleted after public comment period	n/a
17 Exempt	\$29.40	Change Analysis Year to Exempt. Project Cost \$40.37M (2020\$)	Shows correct in public comment document	\$40.37 (2020 \$)
Exempt	\$4.15	Edit From Limit and Description	OK will be corrected in RTP listing after public comment period	Cost ok.
Exempt	\$51.97	Change FY. Project cost \$28.79 M (2020\$)	OK will be corrected in RTP listing after public comment period	\$21 m (2017 \$)
Exempt	\$148.55	Change FY. Project Cost \$114.49M (2020 \$)	OK will be corrected in RTP listing after public comment period	\$76 M (2017 \$)
40 2030	\$180.79	Edit description. Change FY and Analysis Year. Project Cost \$135.63M (2020 \$).	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$110 M (2017 \$)
45 2030	\$106.15	Part of Inner Katy project #11473. Change FY and Analysis Year.	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	n/a
40 2030	\$23.80	Change Analysis Year. Project Cost \$26.95M (2020 \$)	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$24 M (2017 \$)
Exempt	\$24.02	Edit Facility, From limit and Description. Project cost \$64.85 (2020\$)	OK will be corrected in RTP listing after public comment period	\$34 M (2017 \$)
Exempt	\$42.37	Edit description	OK will be corrected in RTP listing after public comment period	\$39 M (2017 \$)
2045	\$5.92	Sponsor is shown as High Capacity Task Force. It duplicates #18227. Delete.	OK will be deleted after public comment period	n/a

ANALYSIS YEAR	PROJECT COST (M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H-GAC on 4/20/21
2045 2040	\$1,561.40	Edit Description. Change FY and Analysis Year. Project Cost \$954.61 M (2020\$)	Can not be modified will trigger new conformity. Can be modified in next conformity run at 2050 RTP update.	\$634 M (2017 \$)
2045	\$2,143.45	Change Description and FY. Project cost \$1,971.78M (2020\$)	Can not be modified will trigger new conformity. Can be modified in next conformity run at 2050 RTP update.	\$1.43 B (2017 \$)
2045	\$2,189.00	Delete. Combined with 18174.	OK will be deleted after public comment period	n/a
2045 2030	\$1,556.00	Edit description. Change FY and Analysis Year. Project Cost \$1,938.25 M (2020\$)	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$1.56 B (2017 \$)
2045 2040	\$2,885.00	Change FY and Analysis Year. Project cost \$793M (2017\$)	Can not be modified will trigger new conformity. Can be modified in next conformity run.	\$793 M (2017 \$)
2045-2030	\$588.76	Change FY and Analysis Year. Project cost \$299.27 M (2020 \$)	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$242 M (2017 \$)
2045 2030	\$277.99	Change FY and Analysis Year	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$204 M (2017 \$)
2045	\$337.95	Change FY. Project cost \$526.31 M (2020\$)	OK fiscal year will be corrected in RTP listing after public comment period. TxDOT (FY 2023) HOV Project is already coded in 2030, 2040 and 2045 AYs.	\$414 M (2017 \$)
2045 2030	\$122.47	Change FY and Analysis Year to be consistent with #18186	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period. We will review the description with METRO.	Cost ok. Description ok.
2030	\$116.13	Change To Limit and Description.	Shows correct FY and AY in public comment document. We will review description with METRO.	Cost ok. Change description to include Kingwood P&R
empt	\$5.51	Delete. Not a METRO project.	OK will be deleted after public comment period	n/a

ANALYSIS YEAR	PROJECT COST (M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H-GAC on 4/20/21
2045-2030	\$52.14	Change FY and Analysis Year. Project Cost \$61 M (2020\$)	OK fiscal year will be corrected in RTP listing after public comment period. AY will be changed to Exempt	\$36.7 M (2021 \$)
2040-2045	\$52.14	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period. AY correctly changed to Exempt	\$35 M (2017 \$)
2040	\$52.14	Change FY.	OK fiscal year will be corrected in RTP listing after public comment period. AY correctly changed to Exempt	\$35 M (2017 \$)
2045 2030	\$52.14	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period. AY correctly changed to Exempt	\$35 M (2017 \$)
2045 2030	\$52.14	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period. AY will be changed to Exempt	\$35 M (2017 \$)
Exempt	\$26.07	Wrong county; not a METRO project	OK fiscal year will be corrected in RTP listing after public comment period.	n/a
2045 Exempt	\$35.55	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period.	\$35 M (2017 \$)
2045 Exempt	\$35.55	Change FY and Analysis Year	OK fiscal year and limits will be corrected in RTP listing after public comment period.	\$35 M (2017 \$)
Exempt	\$126.43	Duplicate to #11473. Delete	OK will be deleted after public comment period	Delete project. Project #11473 should be named "Inner Katy Busway"
2045	\$365.00	Project was coded but not added to RTP list. Cost in 2017 \$		H-GAC will add to RTP list at appropriate time. Change description to "Transit corridor with multiple transportation hubs"
2045	\$18.00	Project was coded but not added to RTP list. Cost in 2017 \$		Cost for planning only.
Exempt	\$66.00	Not on RTP list. Cost in 2017 \$		Add to RTP.
Exempt	\$52.00	Not on RTP list. Cost in 2017 \$		Add to RTP.
Exempt	\$41.00	Not on RTP list. Cost in 2017 \$		Add to RTP.
Exempt	\$63.00	Not on RTP list. Cost in 2017 \$		Both parties agreed delete. Replaced by 2-way HOV project.
Exempt	\$58.00	Not on RTP list. Cost in 2017 \$		Add to RTP.

ANALYSIS YEAR	PROJECT COST (M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H- GAC on 4/20/21
2030	\$6.51	Not on RTP list.		Both parties agreed delete. Replaced by 2-way HOV project.
2030	\$7.17	Not on RTP list.		Both parties agreed delete. Replaced by 2-way HOV project.
	\$4.56	Not on RTP list.		Both parties agreed delete. Replaced by 2-way HOV project.
empt	\$20 M	Not on RTP list. Cost in 2017 \$		Add to RTP.
empt	\$3.09	Not on RTP list.		Add to RTP.
empt	\$30 M	Not on RTP list. Cost in 2017 \$		Add to RTP.
empt	\$25.00	Request to amend TIP in progress		Add to TIP
empt	\$26.00	Request to amend TIP in progress		Add to TIP
empt	\$44.00	Request to amend TIP in progress		Add to TIP
empt	\$50.00	TIP Placeholder for BOOST corridors. Request to amend TIP in progress		Add to TIP
	\$103 M	RTP placeholder for BOOST corridors. Cost in 2017 \$		Add to RTP.
empt	\$5 M	Request to amend TIP will be sent to H- GAC		Add to TIP



Texas Department of Transportation

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June 14, 2021

Mr. Craig Raborn, AICP
Director, Transportation Planning
Houston-Galveston Area Council (H-GAC)
3555 Timmons Lane, Suite 120
Houston, Texas 77027

RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan (RTP)

Dear Mr. Raborn:

The Texas Department of Transportation (TXDOT) appreciates the opportunity to respond the Metropolitan Transit Authority of Harris County's (METRO) April 27, 2021, correspondence regarding comments on the Houston-Galveston Area Council's (H-GAC) 2045 Regional Transportation Plan (RTP) amendments.

I-10 Inner Katy Corridor Study from I-610 to I-45

TXDOT is keenly aware of the time sensitive nature of the Inner Katy Bus Rapid Transit (BRT) project. The BRT project was the top-ranking project during the 2018 H-GAC Call for Projects and currently is programmed in the H-GAC 2021–2024 Transportation Improvement Program (TIP) to let to construction January 2023. TXDOT will do everything possible to help METRO stay on this implementation timeframe.

The I-10 west (Inner Katy) corridor from I-610 to I-45 is a high-volume, multimodal and freight facility with limited available right-of-way (ROW) for future improvements. This section of roadway carries nearly 275,000 vehicles per day including single occupied vehicles, carpools, vanpools, and buses. Nearly eight (8) percent of the corridor's traffic is freight. METRO's Inner Katy BRT project will impact the State's ROW and the interstate facility.

The identification of existing and future transportation needs for the movement of people and goods within the I-10 Inner Katy corridor is paramount to ensure TXDOT can adequately respond to METRO's inclusion of the proposed Inner Katy BRT currently programmed in the H-GAC TIP.

Further, the inclusion of the High Capacity Transit Task Force's (HCTTF) recommendation of two-way High Occupancy Vehicle (HOV) facilities along most TXDOT freeway corridors in the 2045 RTP requires a better understanding of the impacts of these proposed improvements on the State Transportation System. The Regional Express Access Lanes Plan is our response to the HCTTF's activities.

In short, TXDOT must better understand the physical space ramifications and other impacts these proposed improvements may have on existing TXDOT facilities, including I-10. The I-10 Inner Katy Corridor Study is a direct response to the Inner Katy BRT implementation project. Otherwise, we would be evaluating METRO's Inner Katy BRT project without the necessary information to make sound engineering decisions about the future of the corridor.

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To TXDOT's knowledge, neither the METRO Inner Katy BRT project nor the HCTTF's recommendation of two-way HOV facilities developed enough project level environmental or engineering detail to determine impacts to the human environment, our facility, or the surrounding natural and built environment. Because of the lack of basic project level information on these projects and the certain impact to our facility, TXDOT initiated the I-10 Inner Katy Corridor Study so that we could collaboratively develop a shared vision for the future of I-10 Inner Katy.

TXDOT is committed to supporting the development and implementation of the proposed METRO Inner Katy BRT project. To date, TXDOT and METRO have worked collaboratively and cooperatively to identify and share information for the benefit of the traveling public. We have successfully delivered a joint Virtual Public Meeting event for the Inner Katy Corridor that showcased the METRO Inner Katy BRT project while also soliciting input concerning the existing and future transportation needs of the broader corridor. It is the identification of the needs and the discussion of potential solutions for which TXDOT is currently seeking an amendment to the 2045 RTP. Including the I-10 Inner Katy Corridor Study in the H-GAC long-range plan is the start of a conversation about the future of this vital corridor.

The implementation schedule for METRO's Inner Katy BRT project could be adversely impacted if as requested by METRO, the TXDOT Inner Katy project is not included in the 2045 RTP. Without inclusion of TXDOT's Inner Katy project in the RTP, TXDOT will not be able to make sound engineering decisions about the future development of the corridor.

Hempstead Corridor from I-610 to BW 8

The Hempstead Corridor currently exists in the 2045 RTP. Hempstead will undergo a feasibility study to determine potential scope changes to the project. The study has not commenced, but it will include significant stakeholder engagement and public involvement.

Thank you for the opportunity to respond. Should you have any questions, please contact Andrew C. Mao, P.E. at (713) 802-5301 or via email at Andrew.mao@txdot.gov.

Sincerely,



Eliza C. Paul P.E.
District Engineer
Houston District

Attachment

CC: James W. Koch, P.E., Director, Transportation Planning and Development,
Houston District, TXDOT
Andrew C. Mao, P. E., Director, Advanced Transportation Planning, Houston District, TXDOT
Vishu Lingala, H-GAC



**APTA
AWARD WINNER**

Mission Statement

*"Provide safe,
clean, reliable,
accessible and
friendly public
transportation
services to our
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April 27, 2021

Mr. Craig Raborn
Director Transportation Planning
Houston-Galveston Area Council
P.O. Box 22777
Houston, Texas 77227-2777

RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan

Dear Mr. Raborn,

On behalf of the Metropolitan Transit Authority, I am providing the following comments on Proposed Amendments to the 2045 Regional Transportation Plan.

IH 10W Studemont to Houston Ave

METRO's proposed Inner Katy Busway was selected and funded by the Transportation Policy Council as part of its most recent Call for Projects. As the highest ranked major transportation investment in the Call, this project will continue access for transit buses to Downtown and other destinations inside the 610 West Loop from three major transit corridors: IH 10 West, US 290 and the Galleria Bus Rapid Transit.

The Inner Katy Busway was previously approved by TPC as part of the Regional Transportation Plan (TPC) and is already identified in the current Transportation Improvement Program. It was part of the extensive public outreach conducted during the development of the voter approved METRONext referendum.

It is a time sensitive project and will provide significant benefit to all transit riders using the Northwest Transit Center where transit patrons using express transit in one corridor may connect to another, greatly expanding their potential destinations. It will also expand express transit services to neighborhoods along the Inner Katy corridor. Consequently, METRO is aggressively advancing this high priority project. This work includes



Metropolitan Transit Authority of Harris County, Texas

1900 Main • P.O. Box 61429 Houston, Texas 77208-1429 • 713-635-4000 • RideMETRO.org

continued public engagement on the development of the necessary design and engineering work to fulfill environmental analysis leading to federal approval for construction.

METRO agrees that TxDOT should examine alternatives to mitigate the potential for main lane flooding and opportunities to provide HOV Lane capacity beyond that provided by METRO's Inner Katy Busway. However, these steps will require significant analysis and additional time as TxDOT address concerns that are far beyond the scope of the Inner Katy Busway approved by TPC and by METRONext voters. METRO is, therefore, concerned that TPC approval of TxDOT's IH 10W project may unnecessarily delay METRO's implementation of the Inner Katy Busway.

METRO requests that its project (the Inner Katy Busway) be retained in the Regional Transportation Plan and Transportation Improvement Program as a project of separate and independent benefit.

METRO further requests the TPC delay or provide only conditional approval of TxDOT's IH 10W project from Studemont to Houston Avenue until METRO has had the opportunity to consult with TxDOT and the Federal Transit and Highway Administrations to establish that its currently approved project will be permitted to advance, receive needed environmental approvals, and move to early implementation.

Hempstead Road and IH 610 Managed Lanes

METRO shares the concerns voiced by the City of Houston and other commenters that the Purpose and Need for the elevated managed lanes proposed for Hempstead Road and IH 610W are not well established and that TxDOT has not demonstrated community support for their proposals.

We also share the concern that previous planning activity for these two proposals was conducted so long ago the recommendations from this work may not be consistent with changes in land use and travel over the last 15-20 years.

METRO also believes that historic traffic congestion on the West Loop and US 290 may be relieved by the soon to be completed IH-69/IH-610 West Loop interchange and the expansion of US 290.

The two proposed express lane projects do not seem to advance the vision for High Capacity Transit as described in the recently approved 2045 Long Range Plan. The proposed at-grade bus lanes on Hempstead could allow for some improvement in local transit services but don't reflect the level of express transit service provided today on US 290 or identified in the new 2045 RTP.

It is METRO's desire to work with TxDOT and our regional partners to conduct the planning work needed to clearly identify the transportation needs in these corridors and the alternative ways to address them. Working together, we can achieve broad community support for the development and implementation of any recommendations.

Attached you will find comments on a list of METRO projects in the 2045 RTP related to the air quality conformity determination. This list is the result of ongoing discussions between METRO and H-GAC. Per those discussions, METRO will send a letter requesting the addition of projects to the 2045 RTP that do not impact air quality conformity. I appreciate the support of your staff in developing the list and comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Lambert', with a long horizontal line extending to the right.

Tom Lambert
President & Chief Executive Officer

cc: Tom Jasien, Deputy CEO
Clint Harbert, Vice President – System & Capital Planning
Alan Clark, Chief Strategy Officer
Albert Lyne, Director – Grant Programs
Vishu Lingala, H-GAC

MPID	COUNTY	FACILITY	FROM	TO	DESCRIPTION	FY	ANALYSIS YEAR	PROJECT COST (\$M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H-GAC on 4/20/21	
15483	Harris	NAMTC	Northline TC		Advanced high capacity transit at 610/16th TC, Northline TC, FY 2021	2021	2044	\$1.00	Delete. Included in Inner Katy project #11473.	OK will be deleted after public comment period	n/a	
15549	Harris	Northline TC			Northline TC, FY 2021	2021	2044	\$29.40	Change Analysis Year to Exempt. Project Cost \$40.37M (2020)	Shows correct in public comment document	\$40.37 (2020 \$)	
16240	Harris	Buffalo Bayou Day Lot	At 810 South Loop West		Buffalo Bayou day lot, FY 2022	2022	Exempt	\$4.15	Edit From Limit and Description	OK will be corrected in RTP listing after public comment period	Cost ok.	
18150	Harris	Downtown Houston Transit Corridors			Improve signage and pavement markings (e.g. red bus only lane designations), signal timing and operations, optimize bus stop design and spacing and enhance passenger information on "bus-only" lanes. Louisiana St (NB)/Smith St (SB) corridor from SP 527 to Franklin St; Travis St (NB)/Milam St (SB) from SP 527 to Commerce St; and San Jacinto St (NB)/Fannin St (SB) from McGowan St to Franklin St	2026	2030	Exempt	\$51.97	Change FY. Project cost \$28.79 M (2020)	OK will be corrected in RTP listing after public comment period	\$21 m (2017 \$)
18151	Harris	Westheimer Signature Bus Service	Downtown Houston	West Oaks Mall	Rapid service from Hayes Rd to Edloe St and express service on I 69 between Edloe and DT	2024	2031	Exempt	\$148.55	Change FY. Project Cost \$114.49M (2020 \$)	OK will be corrected in RTP listing after public comment period	\$76 M (2017 \$)
18160	Harris	Uptown BRT	Bellaire/Uptown TC	Guilford TC	Southern extension of Uptown BRT from Bellaire-Uptown TC to Guilford TC, includes 3 stations	2030	2028	2040	\$180.79	Edit description. Change FY and Analysis Year. Project Cost \$135.63M (2020 \$)	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$110 M (2017 \$)
18161	Harris	Uptown BRT	NWTC	Northwest Mall	Extension of Uptown BRT from NWTC to NW Mall/proposed Texas Central HSR terminal, includes 2 stations	2030	2027	2046	\$106.15	Part of Inner Katy project #11473. Change FY and Analysis Year.	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	n/a
18162	Harris	Green & Purple METRO Inet	Theater District	Municipal Courthouse	Extension of Green & Purple LRT lines	2024	2040	2030	\$23.80	Change Analysis Year. Project Cost \$26.95M (2020 \$)	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$24 M (2017 \$)
18164	Harris	Bellaire Guilford TC	8100 Bellaire Blvd		Construct new transit center at Bellaire Blvd and Chinway Road	2030	2028	Exempt	\$24.02	Edit Facility, From limit and Description. Project cost \$64.85 (2020)	OK will be corrected in RTP listing after public comment period	\$34 M (2017 \$)
18167	Fort Bend	SH 6	Near FL Bend Pkwy		Construct park and ride along SH 6 near Fort Bend Pkwy in Sierra Plantation; replace existing bus stop in Kruger parking lot	2024	Exempt	\$42.37	Edit description	OK will be corrected in RTP listing after public comment period	\$19 M (2017 \$)	
18173	Harris	METRO Service Area			Enhancements include ADA compliant, sidewalk adjustments, crosswalk treatments, bench shelter, electronic and bus stop signs, bike racks, lighting and landscaping. Located where significant amount of transfer activity is likely to occur but where a full stand transit center is not warranted, e.g. intersections of high-volume bus routes, transfer bus lines, etc.	2040	2040	\$6.53	Sponsor is shown as High Capacity Task Force. It duplicates #18227. Delete.	OK will be deleted after public comment period	n/a	

PROJECT ID	COUNTY	FACILITY	FROM	TO	DESCRIPTION	FY	ANALYSIS YEAR	PROJECT COST (M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H-GAC on 4/20/21	
18173	Harris	Northline TC North LRT (Red Line)	Northline TC	N Shepherd Park and Ride	Extension of Red/North LRT line from Northline TC to N Shepherd park and ride; includes 8 stations	2040	2031	2046 2040	\$1,561.40	Edit Description. Change FY and Analysis Year. Project Cost \$954.61 M (2020\$)	OK. FY will be corrected in RTP listing after public comment period. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$634 M (2017 \$)
18174	Harris	MLK/Guiggs Rd. Southeast LRT (Purple Line)-Green/Purple Line LRT extension to Hobby Airport	MLK/Guiggs Rd	Hobby Airport	Extension of Green/Purple/SE LRT line from MLK/Guiggs to Hobby Airport via MLK and East Dallas; includes 9 stations	2040	2023	2045	\$2,143.45	Change Description and FY. Project cost \$1,971.78M (2020\$)	OK. FY will be corrected in RTP listing after public comment period. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$1,498 M (2017 \$)
18175	Harris	Magnolia Park TC East LRT (Green Line)	Magnolia Park TC	Harrisburg and Broadway	Extension of Green/SE LRT line from Magnolia Park TC to Hobby Airport via Harrisburg and Broadway; includes 8 stations	2040	2046	2046	\$3,188.00	Delete. Combined with 18174.	OK will be deleted after public comment period.	n/a
18176	Harris	University Line Corridor	Westchase Park and Ride	Tidwell TC	New BRT busway from Westchase park and ride to Tidwell TC via Westpark, Richmond, Alaba, Sign and Lookwood; includes 41 stations	2040	2025	2046 2030	\$1,556.00	Edit description. Change FY and Analysis Year. Project Cost \$1,938.25 M (2020\$)	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$1,568 M (2017 \$)
18177	Harris	Gessner West Houston Corridor (HW B)	Missouri City park and ride	Wilowbrook Mall Little York Park and Ride	New BRT busway from HW B US-60A to Missouri City park and ride to Wilowbrook Mall via Gessner; includes 40 stations	2040	2037	2046 2040	\$2,885.00	Change FY and Analysis Year. Project cost \$793M (2017\$)	OK. FY will be corrected in RTP listing after public comment period. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$793 M (2017 \$)
18178	Harris	CS	Downtown Houston	Bush IAH	New BRT service from DT to IAH; includes 4 stations	2040	2027	2046 2030	\$588.76	Change FY and Analysis Year. Project cost \$299.27 M (2020 \$)	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$242 M (2017 \$)
18182	Harris	SH 249	Boudreaux Dr	Holister Dr	Construct new 2-way, all-day HOV facility	2040	2027	2046 2030	\$277.99	Change FY and Analysis Year	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period.	\$204 M (2017 \$)
18184	Harris	IH 10W	Westgreen	FM 359	Extension of 2-lane HOV facility	2040	2033	2041	\$337.95	Change FY. Project cost \$526.31 M (2020\$)	OK. Fiscal year will be corrected in RTP listing after public comment period. To DOT (FY 2023) HOV Project is already coded in 2030, 2040 and 2045 FYs.	\$414 M (2017 \$)
18186	Harris	IH 45	Downtown Houston	Nasa 1 Bypass	Conversion of existing 1-lane reversible HOV lane (3 lanes one-lane in each direction) HOV facility	2040	2028	2046 2030	\$122.47	Change FY and Analysis Year to be consistent with #18186	It is coded correctly in the model. Fiscal year and analysis years will be corrected in RTP listing after comment period. We will review the description with METRO.	Cost ok. Description ok.
18187	Harris	I-69N	Downtown Houston	Spangon park and ride, Kingwood Dr	Conversion of existing 1-lane reversible HOV lane on I-69 East from DT to Kingwood P&R to 2-way, all day facility	2020	2030	2030	\$116.13	Change To Limit and Description.	Shown correct FY and AY in public comment document. We will review description with METRO.	Cost ok. Change description to include Kingwood P&R
18188	Harris	Spangon-Hwy			Bus priority treatments, bus stop optimization, and frequent service along Airport/Collings/Spangon between Hobby Airport and Sam Houston College in La Porte	2040	2040	2040	\$6.53	Delete. Not a METRO project.	OK will be deleted after public comment period.	n/a

APNO	COUNTY	FACILITY	FROM	TO	DESCRIPTION	FY	ANALYSIS YEAR	PROJECT COST (\$M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H-GAC on 4/20/21	
18192	Fort Bend	Missouri City Park and Ride	US 90A	BW 8	Replaces existing MC park and ride with new facility closer to intersection of US 90A and BW 8	2040	2023	2044-2045	\$63.24	Change FY and Analysis Year. Project Cost \$61 M (2020\$)	OK fiscal year will be corrected in RTP listing after public comment period. AY will be changed to Exempt	\$36.7 M (2021 \$)
18198	Harris	Springwoods Park and Ride	Near Springwoods Village Pkwy		New Park and ride in the vicinity of IH 45 N and Springwoods Village Pkwy	2040-2039	2040-2045		\$52.14	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period. AY correctly changed to Exempt	\$35 M (2017 \$)
18199	Fort Bend	Katy Ft.Bend Rd.	Near Kingsland		New park and ride	2040	2035	2040	\$52.14	Change FY.	OK fiscal year will be corrected in RTP listing after public comment period. AY correctly changed to Exempt	\$35 M (2017 \$)
18200	Harris	Louetta Park and Ride	At Louetta Rd		Construct park and ride facility	2040	2027	2044-2030	\$52.14	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period. AY correctly changed to Exempt	\$35 M (2017 \$)
18201	Harris	SH 249	At Boudreaux Rd		Construct park and ride facility	2040	2027	2044-2030	\$52.14	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period. AY will be changed to Exempt	\$35 M (2017 \$)
18209	Harris	Rosenberg Park and Ride			New park and ride in downtown Rosenberg	2040	Exempt		\$16.07	Wrong county; not a METRO project	OK fiscal year will be corrected in RTP listing after public comment period.	n/a
18213	Harris	Memorial City Transit Center	Gessner		New transit center in vicinity of Gessner and IH 10W	2040	2033	2045	Exempt	Change FY and Analysis Year	OK fiscal year will be corrected in RTP listing after public comment period.	\$35 M (2017 \$)
18214	Harris	Willowbrook TC-4 SH 249	At FM 1960		Construct Willowbrook transit center at SH 249 and FM 1960	2040	2027	2044	Exempt	Change FY and Analysis Year	OK fiscal year and limits will be corrected in RTP listing after public comment period.	\$35 M (2017 \$)
18406	Moore	Inner Katy Corridor	SH 610-W	Katy-Four-DL intersection 3-way ramp	Construct multimodal dedicated BRT busway, including grade-separation and connection to HOV lanes and transit center	2036	Exempt		\$136.43	Duplicate to #11473. Delete	OK will be deleted after public comment period	Delete project. Project #11473 should be named "Inner Katy Busway"
TBD	Harris	Southwest Corridor (US 90A)	TMC	Missouri City (BW 8 and SH 6)	Commuter bus on 2-way HOV	2045	2045		\$365.00	Project was coded but not added to RTP list. Cost in 2017 \$		H-GAC will add to RTP list at appropriate time. Change description to "Transit corridor with multiple transportation hubs"
TBD	Harris/FB	Red Line	Fennell South transit center	Missouri City	Red Line LRT extension (planning phase)	2045	2045		\$18.00	Project was coded but not added to RTP list. Cost in 2017 \$		Cost for planning only.
TBD	Harris	Green Line	@ Park Place Blvd and IH 45 S		Construct new Park Place multimodal transit center and park and ride	2038	Exempt		\$66.00	Not on RTP list. Cost in 2017 \$		Add to RTP.
TBD	Harris	University Corridor	@ Tidwell		Construct Wheeler multimodal TC	2033	Exempt		\$52.00	Not on RTP list. Cost in 2017 \$		Add to RTP.
TBD	Harris	Marey Rd	In vicinity of US 90		Construct new park and ride between US 90 and IH 10 E	2040	Exempt		\$41.00	Not on RTP list. Cost in 2017 \$		Add to RTP.
TBD	Harris	Kingswood Dr	@ US 59N		Construct new park and ride; part of IH 69/US 59 S off-peak HOV/diamond lanes	2040	Exempt		\$63.00	Not on RTP list. Cost in 2017 \$		Both parties agreed delete. Replaced by 2-way HOV project.
TBD		US 290	@ Fairfield Place Dr.		Construct new Fairfield park and ride	2041	Exempt		\$58.00	Not on RTP list. Cost in 2017 \$		Add to RTP

AMPOD	COUNTY	FACILITY	FROM	TO	DESCRIPTION	FY	ANALYSIS YEAR	PROJECT COST (\$M, YOE)	Comments/Proposed Changes	H-GAC Notes	METRO updates to cost and descriptions as requested by H-GAC on 4/20/21
TBD	Harris	IH 45 S	Downtown	Bay Area Blvd.	IH 45 S Off-Peak HOV/Diamond Lanes & signage	2025	2030	\$6.31	Not on RTP list.		Both parties agreed delete. Replaced by 2-way HOV project.
TBD	Harris	I 69 N	Downtown	Kingwood Dr.	I 69/IUS 59 North Off-Peak HOV/Diamond Lanes & signage	2025	2030	\$7.17	Not on RTP list.		Both parties agreed delete. Replaced by 2-way HOV project.
TBD	Harris	I 69 S	Edloe	West Bellfort Blvd.	I 69/IUS 59 South Off-Peak HOV/Diamond Lanes & signage			\$4.36	Not on RTP list.		Both parties agreed delete. Replaced by 2-way HOV project.
TBD	Harris/FB	METRO Service Area	VA	VA	Park & Ride service enhancements/FLM improvements for reverse commute	2025	Exempt	\$20 M	Not on RTP list. Cost in 2017 \$		Add to RTP
TBD	Harris	Bellaire Blvd.	TMC Transit Center	Palm Center Transit Center	BOOST - Bellaire/Palm Center Quickline Extension	2027	Exempt	\$3.09	Not on RTP list.		Add to RTP.
TBD	Harris	TMC			TMC transit improvements and service integration	2040	Exempt	\$30 M	Not on RTP list. Cost in 2017 \$		Add to RTP.
TBD	Harris	Scott			BOOST improvements	2022	Exempt	\$25.00	Request to amend TIP in progress		Add to TIP
TBD	Harris	Airline/Montrose			BOOST improvements	2022	Exempt	\$26.00	Request to amend TIP in progress		Add to TIP
TBD	Harris	Westheimer	Downtown	St 6	BOOST improvements	2022	Exempt	\$44.00	Request to amend TIP in progress		Add to TIP
TBD	Harris	BOOST Corridors	VA	VA	BOOST improvements	2024	Exempt	\$50.00	TIP Placeholder for BOOST corridors. Request to amend TIP in progress		Add to TIP
18180	Harris	BOOST Corridors	VA	VA	BOOST improvements - Bus priority treatments, bus stop optimization, and frequent service along multiple arterials	2040		\$103 M	RTP placeholder for BOOST corridors. Cost in 2017 \$		Add to RTP
TBD	Harris	Westheimer	West Oaks Mall		Construct transit center	2022	Exempt	\$5 M	Request to amend TIP will be sent to H-GAC		Add to TIP

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Renae DeLucia

Organization

n/a

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Most of the projects include added lanes to the detriment of walking, biking, and transit infrastructure. The mentioned projects all prioritize car-dependence. I also have concerns about the air quality implications.

Response

Thank you for your input. The 2045 RTP is made up of numerous plans including the Regional Active Transportation Plan, Regional Safety plan, Regional Coordinated Transportation Plan, Congestion Mitigation Air Quality Plan, to list a few. All these plans can be found in the appendix of the document. The direct link to the active transportation plan is (<http://2045rtp.com/documents/plan/Appendix-H-Regional-Active-Transportation-Plan.pdf>). H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Lauren A

Organization

Self employed

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

It is absurd to be considering ANOTHER major highway renovation when we still do not know the impact on traffic from the "almost finished" 288 project. Also just outside of Houston on i10 going towards Austin there are major renovations happening. NO ONE will want to visit here if ALL OF OUR MAJOR HIGHWAYS ARE UNDERGOING MAJOR RECONSTRUCTION INCLUDING THE HIGHWAY THAT LEADS TO THE CITY. I'm astounded by the incompetence. I've lived here for 10 years. Now I can't wait to leave.

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Oni Blair

Organization

LINK Houston

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

[LINK Houston submitted comments in PDF format to H-GAC and provides them here also plain text format.]

April 28, 2021

Transportation Policy Council (TPC)
Craig Raborn, Transportation Director
Houston-Galveston Area Council (H-GAC)

RE: Comments on proposed 2045 Regional Transportation Plan amendments

Dear Mr. Raborn and TPC Members:

We submit these comments in response to the two virtual public meetings held by H-GAC on Thursday, April 8, 2021, to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). People should be able to reach such opportunities in the Houston region safely and with dignity by walking, rolling, biking, and riding transit. These deeply affordable options must be as viable as those afforded by people able to, or choosing to, own and operate personal vehicles. To that end, LINK Houston advocates for a robust and equitable transportation network so that all people can reach opportunity. We strive to be anti-racist and center equity and climate justice in all we do.

Several of the proposed RTP amendments are major highway infrastructure concepts for corridors in Houston through existing residential and commercial development. We have serious concerns about the proposed scope and schedules of these proposed additions to the region's 2045 Regional Transportation Plan. The amendments are not for projects in the distant future. Rather, the amendments requested by the Texas Department of Transportation (TxDOT) propose construction beginning by 2030, within the 10-year Transportation Improvement Program (TIP) program of projects. This gives rise to our primary concern and why we ask TPC to not accept the amendments to the RTP.

TxDOT is premature and acting on outdated concepts. TPC should reject the TxDOT amendments and instead provide leadership by directing the agency to thoroughly implement the federally required process to engage communities and interagency partners to:

(1) Identify if a project is actually warranted and to identify need and purpose (i.e., following the Planning and Environmental Linkages (PEL) process);

AND THEN IF WARRANTED...

(2) Explore a full suite of project alternatives through interagency cooperative planning and in concert with directly adjacent communities (i.e., develop alternatives that satisfy the "critical links between transportation needs and other societal goals").

The Federal Highway Administration (FHWA) Transportation Planning Process Briefing Book states the following in the introduction, "The performance of the transportation system also affects public policy concerns, such as safety, air quality, environmental resource consumption, social equity, resilience, land use, urban growth, economic development, and security. Transportation planning recognizes the critical links between transportation needs and other societal goals." [emphasis added]

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments will bypass the Planning and Environmental Linkages process which is intended by Congress and FHWA to accelerate project delivery with early cooperative and comprehensive planning. According to the FHWA webpage,

"Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that 1) considers environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analysis, and products developed during planning to inform the environmental review process."

LINK Houston believes thorough community engagement to develop qualitative data and thorough quantitative analysis of transportation demand, travel patterns, and environmental impacts are both warranted given travel preference trends and technologies, recent telework experience, and technological advances changing how and when people and goods move. Data from these analyses will impact the need and purpose for each project. The PEL process, quantitative data analysis, and qualitative data from engagement must be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated.

The proposed amendments are for transportation projects inseparably connected with other goals and plans. The City of Houston Climate Action Plan, Resilient Houston, Vision Zero Strategy, the METRONext Moving Forward Plan, and other local plans are all more recent than the outdated thinking behind TxDOT's requested amendments. Houston and the region deserve better. We can do better. Our residents and businesses need us to be better. One way to stretch and be better is for TPC to require project sponsors to incorporate locally supported goals and plans into the purpose and need for corresponding projects. For example, projects within the City of Houston must incorporate goals from the Climate Action Plan, such as to "Reduce Vehicle Miles Travelled per capita 20% by 2050."

LINK Houston suggests TPC instruct H-GAC staff to conduct a study, including extensive public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP. The combined Inner Katy Managed Lanes, I-610 W Managed Lanes, and Hempstead Highway Managed Lanes proposed as amendments to the 2045 RTP with 2026-2030 construction dates seem to indicate an intent to construct core elements of a regional express access lane concept. Initiation of federal environmental review for the Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes seems premature given that a network of interconnected elevated express lanes remains a planning-level concept. The vision of a regional elevated express lane network has not been vetted with the public, reviewed, or approved by the H-GAC Transportation Policy Council, nor contemplated in the 2045 Regional Transportation Plan adopted by the agency responsible for regional transportation planning less than two years ago in May 2019.

The benefits and burdens of transportation policies and systems should be equitably allocated across communities so we collectively address past harm and neglect to ensure that all people can reach opportunities in the future. The 2045 RTP states that, "H-GAC's mission is to plan for the orderly growth and development of the region, working in concert with multiple planning partners. This mission involves building region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity."

The public expects H-GAC to fulfill its mission. Likewise, the public expects TPC to provide leadership built upon the foundation of sound thinking and fair representation – with deep mutual respect for members representing the locations where projects occur.

Thank you for the opportunity to provide comments on the proposed amendments to the 2045 RTP.

Sincerely,

Oni K. Blair
Executive Director
LINK Houston

P.S. Below are project-specific comments on proposed RTP amendments. We make these additional comments in full support of the City of Houston's, residents', and business owners' posted comments.

Hempstead Highway/Road

Proposed Amendment: Reconstruct Hempstead Road and add one transit lane in each direction at grade and construct 4 elevated managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Elevated lanes have not been coordinated.
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I-10 W from I-610 W to I-45 N

Proposed Amendment: Reconstruct 10 mainlanes and two 2-lane frontage roads and construct 4 new non-toll managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Result of METRO's Inner Katy Bus Rapid Transit (BRT) service to accommodate additional travel demand should be recognized before consideration of additional capacity.

I-610 W from I-10 W to I-69 S

Proposed Amendment: Construct 4 express lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Previously canceled due to significant public opposition.

I-10 W Studemont to Houston Ave

Proposed Amendment: Reconstruct to raise the existing 10 mainlanes out of the White Oak Bayou floodway, for reconstructing 2 lane CBD connectors to 4 managed lanes.

- Maintain METRO Inner Katy Bus Rapid Transit (BRT) dedicated access to downtown.
- Removal of structures from the floodway consistent with Resilient Houston goals.

LINK Houston provided detailed comments to TxDOT and METRO in February 2021: Public Comments on Inner Katy Corridor. We are concerned about TxDOT's I-10 Inner Katy Managed Lanes Project, but generally support the agency's I-10 Inner Katy Drainage Improvements Project to better manage flooding. TxDOT is exploring if the state should add four managed lanes to I-10 and/or improve flood mitigation. In LINK Houston's view, a successful I-10 Inner Katy Managed Lanes Project serves high-occupancy vehicles (or enforces high/variable tolls on all vehicles with only one occupant) and does not in any way impede the quality of the Inner Katy METRO Rapid Bus Rapid Transit (BRT) line and stations. The new BRT line is the additional transportation capacity in the corridor supported by the region's plans. TxDOT had the opportunity to create managed lanes when originally expanding the highway in the 2000's and chose not to do so.

SH 35 from Dixie Drive to Brazoria County Line

Proposed Amendment: Construct new 6 lane freeway with new 2-lane frontage roads.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Significant work funded by the metropolitan planning organization has focused on development of commuter rail in the SH 35 corridor. This does not appear to have been considered or recommended. The H-GAC High-Capacity Transit Framework approved by TPC states, "Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways."
- Limit footprint to within Mykawa Road right-of-way to minimize impacts on residents.

Response

A response from TxDOT is attached



P.O.BOX 1386, HOUSTON, TEXAS 77251-1386 | 713.802.5000 | WWW.TXDOT.GOV

June 15, 2021

Mr. Craig Raborn, AICP
Director, Transportation Planning
Houston-Galveston Area Council (H-GAC)
3555 Timmons Lane, Suite 120
Houston, Texas 77027

RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan (RTP)

Dear Mr. Raborn:

This letter is in response LINK Houston's April 28, 2021, correspondence regarding comments on the Houston-Galveston Area Council's (H-GAC) 2045 Regional Transportation Plan (RTP) Amendments. The Texas Department of Transportation (TXDOT) will address LINK Houston's comments regarding TXDOT's project development process and then we will address the specific projects identified in the LINK Houston letter.

TXDOT has a long-standing history of providing a robust and equitable transportation system that has served as the State's transportation backbone providing critical access to opportunities and facilitating job creation and economic prosperity. The system is extremely efficient. The State system represents 26 percent of the public roads in Texas and, yet, it carries 72 percent of the vehicle miles traveled.

The Houston region is a microcosm of the State. As the fourth (4) largest City in the nation, Houston and the surrounding region can credit the historical collaboration and cooperation of regional leadership for having had the vision to make the tough decisions and investments needed to bring us to today's regional transportation network. The TXDOT Houston District has not wavered from its commitment to this collaboration and cooperation, but we do not serve one (1) constituency more ardently than any other. Our primary concern is safely moving people and goods in the entire region and beyond.

The TXDOT Houston District strives for excellence on every project and to serve equally the nearly seven (7) million regional residents – from those in the dense, urban core of Harris County to those in rural areas of Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, and Waller Counties. We are especially concerned about those that are most vulnerable.

To accomplish TXDOT's mission, we use some of the most rigorous industry methods to develop our portfolio of projects and to move those projects through project development toward implementation. To that end, the Planning and Environmental Linkage (PEL) Study process, as suggested by LINK Houston, is not the appropriate process to use on most projects. The PEL process is designed to accelerate project delivery by integrating the planning and environmental process with implementation occurring, generally, within five (5) years. While TXDOT is certainly able to perform PEL studies, financial resources cannot keep pace with the potential portfolio of construction projects that would result from the PEL process. In other words, the PEL is not a tool to determine whether a project should be in the RTP, it's a tool for accelerated implementation.

OUR VALUES: *People • Accountability • Trust • Honesty*

OUR MISSION: *Connecting You With Texas*

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There are, however, many scientific methods TXDOT uses and studies performed to make decisions about the need for investment and to determine the types of improvements that are required to meet public needs. Our improvements follow industry-standard, federal, and state guidelines for engineering analysis and always consider environmental impacts. Whatever study method is employed, every project goes through the National Environmental Policy Act (NEPA) clearance process and TXDOT's major projects also go through stakeholder engagement and the public involvement process. In general, major projects are those other than routine maintenance, bridge replacements and certain safety improvements.

TXDOT's stakeholder and public engagement process is second to none in the Houston region. No other local government or transportation agency goes through the extensive and rigorous project level public involvement that TXDOT does. In fact, we would recommend as a best practice that other agencies implement our high standard of public engagement. TXDOT's level of engagement is appropriate given the diversity of use and volume of vehicles we accommodate within the region including Single Occupied Vehicles (SOV), carpools, vanpools, busses, and freight haulers. TXDOT is not focused on one (1) mode choice over the other. That is not our mission. TXDOT moves people and goods across a ground transportation system in whatever mode choice the user decides is appropriate.

With that said, TXDOT does want to move people as efficiently as possible across our system, and so we have invested in projects that help users do just that. TXDOT's Houston ConnectSmart Project seeks to level out the Bell Curve of congestion over time, space and ultimately mode in the eight (8) county region. We want to make Houston more connected and less congested. By providing users with information and better travel options such as carpool, vanpool and bus options that are personalized and tailored to the individual and rewarding them for their congestion-relieving decisions, TXDOT believes users are empowered to help us achieve our Visions Zero goal and ultimately will reduce vehicle miles traveled and improve our region's air quality and these choices will be made while riding on some of the safest and most comfortable facilities in the region. Cleaner air and improved safety require a comprehensive approach of engineering and technology solutions to get TXDOT where we want to be with respect to safety and climate. We are committed.

The Regional Express Access Lanes (REAL) concept is a response to the work performed by H-GAC's High Capacity Transit Task Force (HCTTF) in 2019, which developed a recommended network of high capacity transit facilities that largely proposed following the State system. The transit recommendations from this effort included multiple Bus Rapid Transit (BRT), Light Rail, and Commuter Rail lines. The task force's recommendation, developed over seven (7) task force meetings, were subsequently integrated into the 2045 RTP. No full suite of alternatives, qualitative or quantitative process involving data collection and analyses, universe of alternatives, or thorough process for community engagement was performed prior to including these impactful and potentially disrupting technologies into the 2045 RTP, other than the federally required, standard public meeting process for the long-range plan document.

The HCTTF recommendations, and the subsequent inclusion of those recommendations in the 2045 RTP, spurred TxDOT's interest to better understand the impacts of these technologies on the State system. The REAL Plan is a proposed comprehensive and forward-looking plan that seeks to understand how the State system can maximize the movement of people and goods in a highly efficient and agile manner. We are in Phase 1 of The REAL Plan, which includes coming together with our regional transportation partners to make data-driven decisions that are both quantitative and qualitative.

While the State system does support most vehicle miles traveled, the State system does not operate in a vacuum. The Region's ground transportation system functions as a hierarchy. Local streets feed into collectors, collectors feed into arterials and so on leading up to Interstates. A person using this network cannot get from home to their destination without using this integrated transportation network governed by multiple jurisdictions. TxDOT believes a coordinated REAL Plan vision is essential before introducing the concept to the public. To do anything else would compromise the cooperative process between the transportation partners and their respective transportation networks.

Phase 1 of The REAL Plan is the start of a conversation that TxDOT hopes will still be discussed 20 years from now as the REAL Plan goes from concept to phased implementation as needs, resources and new technologies are identified. TxDOT hopes in Phase 2 that H-GAC, with the transportation partners commitment toward a shared vision for the future of transportation in the region, will take The REAL Plan to the next step – the public and ultimately formalize The REAL Plan vision into the region's long-range plan. The TxDOT system is one part of The REAL Plan vision, albeit a critical part since the State's system serves as the transportation backbone moving people and goods in the region.

Further, TxDOT has no preconceived ideas of a REAL Plan network being a series of "interconnected elevated express lanes". Each corridor requires an independent and deeper data-driven analysis that includes the REAL Plan framework and goals collectively agreed upon by the regional transportation partners to ensure an integrated system that provides equitable services from the first mile to the last mile of a person's trip. This independent, corridor level study will collect the specific data and land use information required to determine the needs within that specific corridor. These corridor level studies will include extensive stakeholder engagement and public involvement. That is TxDOT's process.

Some of these major studies being proposed by TxDOT in the 2045 RTP Amendment may be utilizing concepts from the REAL Plan vision that is, admittedly, still in Phase 1. However, each of these corridor studies can function independently, absent a REAL Plan vision because they are being evaluated based on corridor-specific data and needs augmented with public and stakeholder input. The REAL Plan vision does propose an integrated transportation network that is accessed through mobility hubs. Any recommended corridor improvements today should be agile enough to meet a REAL Plan future.

In summary, TxDOT recommends the Transportation Policy Council (TPC) approve the 2045 RTP Amendments as submitted. This will enable us to work cooperatively and collaboratively to plan for the orderly growth and development of the ground transportation system and to foster increased economic vitality and enhanced access to opportunities through more efficient movement of people and goods in the 8-county region.

A final thought before we address the specific projects mentioned in LINK Houston's letter. TXDOT is unwavering in its commitment to provide high-quality, safe, multimodal transportation that is affordable and dignified. Our facilities are not limited to the SOV, any ground transportation mode can access our facilities subject to law. Further, the High Occupancy Vehicle (HOV) lanes incentivize sharing a ride by offering enhanced reliability and managed lanes penalize the SOV by charging a fee for use; although, most are not operated by TXDOT even though they are on the State system. Causing congestion by limiting improvements to the State system to spur behavior change toward higher occupancy commuting and transit ridership is not an acceptable solution. The improvements TXDOT provides are not only for capacity; our improvements increase safety and enhance the driving experience by creating a facility that operates more comfortably for all modes. H-GAC's long-range plan indicates the region's population will swell to nearly 11 million by 2045. It will take all of us working together to provide an integrated and robust ground transportation system that provides users options, so they can decide which mode meets their needs

TXDOT would like to address the specific project concerns outlined in LINK Houston's letter.

Hempstead Road

Hempstead Road from I-610 to BW 8 currently exists in the 2045 RTP. This project will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder engagement and public involvement. As discussed earlier, TXDOT has been inspired by the work of the HCTTF and believes REAL Plan concepts are appropriate to explore in this corridor given its proximity and connection to the proposed high-speed rail project, the Galleria BRT, Northwest Transit Center, and a potential connection to the Inner Katy Corridor and the Central Business District. We look forward to working with all the stakeholders and the public to potentially refine the scope of this important project. All potential scope changes will reflect new technologies and use appropriate, available data.

I-10 West from I-610 West to I-45 and I-10 West from Studemont to Houston Avenue

TXDOT is keenly aware of the time sensitivity of the Inner Katy BRT Project. The BRT Project was the top-ranking project during the 2018 H-GAC Call for Projects and currently is programmed in the H-GAC 2021–2024 Transportation Improvement Program (TIP) to let to construction January 2023. TXDOT will do everything possible to help the Metropolitan Transit Authority of Harris County (METRO) stay on their implementation timeframe.

The I-10 west (Inner Katy) Corridor is a high-volume facility in terms of passenger and freight movement with limited right of way (ROW) for future improvements. This section of roadway carries nearly 275,000 vehicles per day including SOV, carpools, vanpools, and buses. Nearly 8 percent of the corridor's traffic is freight. METRO's Inner Katy BRT Project will impact the State's ROW and the interstate facility.

The identification of existing and future transportation needs for the movement of people and goods within the I-10 Inner Katy Corridor is paramount to ensure TXDOT can adequately respond to METRO's inclusion of the proposed Inner Katy BRT currently programmed for construction in the H-GAC's TIP.

In short, TXDOT must better understand the physical space ramifications and other impacts these proposed improvements will have on the I-10 Inner Katy Corridor. The I-10 Inner Katy Corridor Study is a direct response to the Inner Katy BRT implementation project. Otherwise, TXDOT would be evaluating METRO's Inner Katy BRT project without the necessary information to make sound engineering decisions about the future of the corridor.

To TXDOT's knowledge, the METRO Inner Katy BRT Project does not have enough project level environmental or engineering detail to determine impacts to the human environment, our facility, or the surrounding natural and built environment. Because of the lack of basic project level information on these projects and the certain impact to our facility, TXDOT initiated the I-10 Inner Katy Study so that we could collaboratively develop a shared vision for the future of I-10 Inner Katy.

TXDOT acknowledges that in the days following the federal disaster declaration related to the COVID-19 pandemic, traffic volumes dropped substantially. Traffic volumes remained low in the following months. This is supported by the Regional Travel Impacts of COVID-19 report prepared by the H-GAC and presented at the May 21, 2021, TCP meeting. The report indicates that while traffic volumes initially dropped, the volumes have rebounded and as of "September 4, 2020, the Friday of Labor Day weekend, that travel volumes were equal to or greater than the baseline volume." The report goes on to say that travel volumes have hovered at approximately 80 percent of the pre-COVID volumes.

TXDOT's own data shows that traffic volumes are at or near pre-COVID volumes. The Governor has declared the State open and businesses are returning to normal, we anticipate higher traffic volumes as many individuals may shift from transit to SOV for personal health reasons. In addition, traffic patterns may have changed. For instance, there may be fewer people traveling from home to work during peak periods and more people may be running errands during the day. Nevertheless, the volumes have rebounded, therefore, telecommuting does not seem to have had a significant impact on the State's transportation system. TXDOT does suggest that H-GAC and/or METRO perform a new traffic analysis to reflect the effects of the COVID-19 pandemic and the resultant telecommuting/changes in travel patterns on transit ridership because the traditional morning/evening peak travel demand may have been impacted and thus, may impact current and proposed bus operations. This will ensure that investments being made to develop and implement these very impactful transit services will be using the latest post-pandemic assumptions and data.

TXDOT is committed to supporting the development and implementation of the proposed METRO Inner Katy BRT Project. To date, TXDOT and METRO have worked collaboratively and cooperatively to identify and share information for the benefit of the traveling public. We have successfully delivered a joint Virtual Public Meeting event for the Inner Katy Corridor that showcased the METRO Inner Katy BRT Project while also soliciting input concerning the existing and future transportation needs of the broader corridor. It is the identification of the needs and the discussion of potential solutions for which TXDOT is currently seeking an amendment to the 2045 RTP. Including the Inner Katy Corridor Study in the H-GAC long-range plan is the start of a conversation about the future of this vital corridor. TXDOT would not want the implementation schedule for METRO's Inner Katy Project to be adversely impacted if as requested by METRO, the TXDOT Inner Katy Project is not included in the 2045 RTP. Without inclusion of TXDOT's Inner Katy Project in the RTP, TXDOT will not be able to make sound engineering decisions about the future development of the corridor.

I-610 West from I-10 West to I-69 South

PENDING

SH 35 from Dixie Drive to Brazoria County Line

Improvements to SH 35 from Dixie Drive and continuing south past the Brazoria County (County) line to future SH 99 are needed to provide a critical connection for communities in the southern part of TXDOT Houston District's service area. As stated previously, we do not believe telecommuting to be a large factor in traffic volumes and we do not see where "significant work" has been performed in the corridor to determine that the focus of development for this corridor should be commuter rail. Furthermore, TXDOT would not be the implementing agencies for commuter rail. Commuter rail planning, design, and implementation would be performed by others.


TXDOT's process for corridor studies involves both a quantitative and qualitative process that features extensive stakeholder and public engagement and input before finalizing a proposed improvement concept. We believe including the project in the 2045 RTP establishes meaning by public engagement by communicating TXDOT intends to study the corridor because this corridor is vital to the transportation system for the cities south of Houston. Improvements are anticipated to move people and goods more reliably.

Conclusion

TXDOT is unwavering in its commitment to continually work with regional transportation partners and the nearly 7 million constituents in the Houston-Galveston-Brazoria-Woodlands-Conroe Transportation Management Area to ensure they all have a voice in the State planning process. This continuous cooperation and collaboration are fundamental to achieving the region's mission of improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity.

In addition to this letter, we have provided specific responses to public comments as part of H-GAC's Response Matrix for the 2045 RTP Amendments. Thank you for the opportunity to respond. Should you have any questions please contact my office at (713) 802-5001 or via email at eliza.paul@txdot.gov.

Sincerely,



Eliza C. Paul P.E.
District Engineer
Houston District

Attachment

CC: James W. Koch, P.E., Director, Transportation Planning and Development,
Houston District, TXDOT
Andrew C. Mao, P. E., Director, Advanced Transportation Planning, Houston District, TXDOT
Vishu Lingala, H-GAC
Oni K. Blair, Executive Director, LINK Houston

April 28, 2021

Transportation Policy Council (TPC)
Craig Raborn, Transportation Director
Houston-Galveston Area Council (H-GAC)

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Oni K. Blair

RE: Comments on proposed 2045 Regional Transportation Plan amendments

Dear Mr. Raborn and TPC Members:

We submit these comments in response to the two virtual public meetings held by H-GAC on Thursday, April 8, 2021, to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). People should be able to reach such opportunities in the Houston region safely and with dignity by walking, rolling, biking, and riding transit. These deeply affordable options must be as viable as those afforded by people able to, or choosing to, own and operate personal vehicles. To that end, LINK Houston advocates for a robust and equitable transportation network so that all people can reach opportunity. We strive to be anti-racist and center equity and climate justice in all we do.

Several of the proposed RTP amendments are major highway infrastructure concepts for corridors in Houston through existing residential and commercial development. We have serious concerns about the proposed scope and schedules of these proposed additions to the region's 2045 Regional Transportation Plan. The amendments are not for projects in the distant future. Rather, the amendments requested by the Texas Department of Transportation (TxDOT) propose construction beginning by 2030, within the 10-year Transportation Improvement Program (TIP) program of projects. This gives rise to our primary concern and why we ask TPC to not accept the amendments to the RTP.

TxDOT is premature and acting on outdated concepts. TPC should reject the TxDOT amendments and instead provide leadership by directing the agency to thoroughly implement the federally required process to engage communities and interagency partners to:

- (1) Identify if a project is actually warranted and to identify need and purpose (i.e., following the Planning and Environmental Linkages (PEL) process);
AND THEN IF WARRANTED...**
- (2) Explore a full suite of project alternatives through interagency cooperative planning and in concert with directly adjacent communities (i.e., develop alternatives that satisfy the "critical links between transportation needs and other societal goals").**

The Federal Highway Administration (FHWA) *Transportation Planning Process Briefing Book* states the following in the introduction,

"The performance of the transportation system also affects public policy concerns, such as safety, air quality, environmental resource consumption, social equity, resilience, land use, urban growth, economic development, and security. Transportation planning recognizes the critical links between transportation needs and other societal goals." [emphasis added]

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments will bypass the Planning and Environmental Linkages process



which is intended by Congress and FHWA to accelerate project delivery with early cooperative and comprehensive planning. According to the FHWA webpage,

"Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that 1) considers environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analysis, and products developed during planning to inform the environmental review process."

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LINK Houston believes thorough community engagement to develop qualitative data and thorough quantitative analysis of transportation demand, travel patterns, and environmental impacts are both warranted given travel preference trends and technologies, recent telework experience, and technological advances changing how and when people and goods move. Data from these analyses will impact the need and purpose for each project. The PEL process, quantitative data analysis, and qualitative data from engagement must be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated.

The proposed amendments are for transportation projects inseparably connected with other goals and plans. The City of Houston Climate Action Plan, Resilient Houston, Vision Zero Strategy, the METRONext Moving Forward Plan, and other local plans are all more recent than the outdated thinking behind TxDOT's requested amendments. Houston and the region deserve better. We can do better. Our residents and businesses need us to be better. **One way to stretch and be better is for TPC to require project sponsors to incorporate locally supported goals and plans into the purpose and need for corresponding projects.** For example, projects within the City of Houston must incorporate goals from the Climate Action Plan, such as to "Reduce Vehicle Miles Travelled per capita 20% by 2050."

LINK Houston suggests TPC instruct H-GAC staff to conduct a study, including extensive public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP. The combined Inner Katy Managed Lanes, I-610 W Managed Lanes, and Hempstead Highway Managed Lanes proposed as amendments to the 2045 RTP with 2026-2030 construction dates seem to indicate an intent to construct core elements of a regional express access lane concept. Initiation of federal environmental review for the Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes seems premature given that a network of interconnected elevated express lanes remains a planning-level concept. The vision of a regional elevated express lane network has not been vetted with the public, reviewed, or approved by the H-GAC Transportation Policy Council, nor contemplated in the 2045 Regional Transportation Plan adopted by the agency responsible for regional transportation planning less than two years ago in May 2019.

The benefits and burdens of transportation policies and systems should be equitably allocated across communities so we collectively address past harm and neglect to ensure that all people can reach opportunities in the future. The 2045 RTP states that,

"H-GAC's mission is to plan for the orderly growth and development of the region, working in concert with multiple planning partners. This mission involves building region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity."



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Proposed Amendment: Reconstruct to raise the existing 10 mainlanes out of the White Oak Bayou floodway, for reconstructing 2 lane CBD connectors to 4 managed lanes.

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- Removal of structures from the floodway consistent with Resilient Houston goals.

LINK Houston provided detailed comments to TxDOT and METRO in February 2021: [Public Comments on Inner Katy Corridor](#). We are concerned about TxDOT's I-10 Inner Katy Managed Lanes Project, but generally support the agency's I-10 Inner Katy Drainage Improvements Project to better manage flooding. TxDOT is exploring if the state should add four managed lanes to I-10 and/or improve flood mitigation.

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- Limit footprint to within Mykawa Road right-of-way to minimize impacts on residents.



Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Scott Moorhead

Submission Method

Online

Organization

Audubon Texas

Date Comment Submitted

04/28/2021

Comment

The Katy Prairie is an essential, and irreplaceable, key to the region's health and vitality today and going forward, supporting more than 300 species of birds, and providing critical flood mitigation and ecosystem services to the entire region. It is well understood to be a critical piece of natural infrastructure that supports the region's resilience to extreme weather, and provides outdoor recreation and uninterrupted open space for so many in the region who might not otherwise have access. Decades of human capital and real treasure have gone into preserving what little remains of a once much-larger coastal prairie system--to the benefit of the entire region. For the benefit of the people and wildlife of the region, it is essential to keep intact what little is left of this irreplaceable place.

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Erin Eriksen

Organization

Stop TxDOT I-45

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Thank you for the opportunity to submit comments. As a Houston resident, I am concerned with future planning that is focused mainly on car travel to move people around the city. There are many detrimental factors to consider regarding air quality with these proposed projects.

Projects in the RTP should be prioritizing safety; expanding lanes and increasing VMTs do not align with Vision Zero initiatives. Of gravest concern, is that the "Transportation Conformity" Chapter, titled "Air Quality" in the 2045 RTP table of contents, misleadingly represents the region's air quality status.

While we appreciate the need for the chapter to discuss and present the conformity process and results, the lack of information and data presented on the ozone standard and the region's attainment designation is striking. In essence, there are two air quality standards of interest for the Houston-Galveston-Brazoria (HGB) region—one that the region meets (the Texas Commission on Environmental Quality's (TCEQ) Motor Vehicle Emission Budgets (MVEB) for nitrogen oxides (NOx) and volatile organic compounds (VOCs)) and one that it does not (the Environmental Protection Agency's (EPA) National Ambient Air Quality Standards (NAAQS) Ozone standard). The chapter overwhelmingly focuses on the TCEQ MVEB standard; 4 of the chapter's 7 pages are of charts and tables showing the region meeting the emission budgets. Nowhere in the chapter, however, are similar tables, charts or data illustrating the region's nonattainment to EPA's ozone standard. We are concerned that the information presented, and omitted, gives the false impression that the region is successfully meeting air quality standards, when in reality, it is not.

This is yet more concerning given that the region's ozone readings are actual—obtained via dozens of air quality monitoring sites across the region—whereas TCEQ's MVEB targets are theoretical and model-derived.

To improve this, we request/ recommend:

- Provide a clear representation of the region's actual air quality status;
- Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets;
- Include data, charts, tables regarding the EPA ozone standard.

Rewrite the Transportation Conformity/ Air Quality chapter as a more user-friendly document with the public in mind.

Conformity and the air quality regulatory process is complex and confusing. The way that the Transportation Conformity/ Air Quality chapter is written and presented makes it more so. Throughout the chapter, a number of important acronyms are never spelled out. These include TCEQ, NOx, VOCs. Please remember that the RTP is a public facing document intended to present the region's long range transportation vision. This section is not digestible, lacks context (why do we care about air quality?), excludes references (footnotes 2 and 3), and provides very few leads for an individual to educate themselves on air quality issues.

To address this, we request/ recommend:

- Provide context; why is air quality important to the region;
- Use less technical language and spell out acronyms;
- Provide information on the Transportation Control Measures and Emission Control

Programs deployed across the region. Given the region's "serious attainment" designation, we would imagine the public to be interested in the region's efforts to reduce emissions.

Include discussion of air quality related health risks and benefits

Via the Clean Air Act, the NAAQS for six criteria pollutants were created as safeguards for public health. To be exact, they were created "to protect human health and welfare" from harmful pollutants; ozone having been identified by the EPA as one of the six criteria pollutants. The intent of an MPO's air quality efforts therefore must be with this health goal in mind. However, chapter 6 includes no discussion of human health or why the region should be concerned about VOCs, NOx, or ozone.

Across Texas, asthma (the clearest and most serious health risk tied to high levels of ozone) is the number one reason for school absenteeism. Child asthma rates are also found to be higher at schools with greater proximity to roads. A 2017 American Lung Association study found asthma levels to be higher in Houston than in most other parts of the country and are most concentrated in low-income and minority communities. Asthma rates, and health injustices, are yet another datapoint that must be considered while planning the region's transportation future.

To address this, we request/ recommend:

- Establish programs and goals that address the region's air quality related health issues with a focus on the populations and communities that suffer the brunt of environmental/ transportation-related health harms;
- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single occupancy

vehicle travel that will worsen air quality.

As a whole, RTP 2045 (and its amendments) are in conflict with the region's air quality and health goals.

As long as H-GAC transportation planning prioritizes road expansion and single-occupancy vehicle travel over alternative transportation modes, as is done throughout RTP 2045, air quality, health, and road congestion will be horrendous in the region. For example, under the current plan, there will be a 61% population growth over the next 25 years, with a 61% increase in vehicles, and an increase of more than 100,000,000 VMT. When logic is applied, it is evident that a transportation forced to absorb 61% more vehicles would be crippled far beyond the existing congestion rates. RTP 2045 should plan for future population growth using methods that efficiently move the population, which is not with single-occupant vehicles. The transportation infrastructure built between now and 2045 is one of the most influential drivers of vehicle ownership.

Again, please remember that the purpose of long-range transportation plans, such as RTP 2045, is to provide the public with a vision for the region. The vision that RTP 2045 presents is increased population, VMTs, congestion without identifying any programs or strategy for improving air quality and health outcomes.

To address this, we request/ recommend:

- Prioritize transportation modes, such as biking, walking, electric vehicles, and public transportation over road expansion and single-occupancy vehicle travel that will worsen air quality.

It is our right to live in a city that values our health and safety. By continuing to consider and implement projects that increase VMTs, and therefore harmful pollutants Houston residents will be at risk. We should be looking toward the future for moving people around our city that is not solely car based.

Thank you for your time.

Erin Eriksen

Response

Thank you for providing comments on the air quality conformity document. For your comment regarding Chapter 6 of the RTP document, H-GAC will consider the addition of more air quality information on this chapter in the next conformity determination.

For your comment regarding the use of acronyms, H-GAC has a list of acronyms in the conformity website. For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs), here is our explanation: The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motor Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard.

For our next conformity determination, H-GAC will consider the addition of a discussion regarding air quality standards, air quality control strategies for mobile sources, and air pollution and health effects.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Timothy White

Organization

Texas Citizen

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

The inclusion of Highway 36A across protected lands managed by the Katy Prairie Conservancy, destroying valuable habitat utilized by thousands of cranes, geese, ducks, and other wildlife is an outrage. This valuable prairie habitat was set aside to provide a lasting refuge in the Waller County area.

The short opportunity you have provided for the comment period appears to be an attempt to slide this by the public vetting process for your own betterment. Please provide an extended comment period so that more voices may be heard on this topic. Better still, please reconsider the location of this highway to minimize the environmental impact to this sensitive and valuable area

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Neal Ehardt

Organization

Ehardt Industries

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I don't understand how you can forecast a sharp increase in VMT while also forecasting a sharp decrease in VOC and NOx emissions. Please provide all inputs to your air quality model that relate to vehicle efficiency.

Response

Thank you for submitting your comments on the air quality conformity document.

These emissions reductions are due primarily to fleet turn over and the implementation of new federal standards. The Tier 2 emission standards implemented in 2004 for light duty gasoline vehicles and light duty gasoline trucks show emission reductions of up to 95% in NOx versus Tier 1 vehicles. In addition, the Clean Diesel federal rule, which was implemented in 2006 for heavy duty diesel vehicles, shows an emission reduction of 96% in NOx versus previous standards. The Tier 3 vehicle standards implemented between 2017 and 2025 reduces both tailpipe and evaporative emissions from passenger cars, light-duty trucks, medium-duty passenger vehicles and some heavy-duty vehicles. Once fully implemented, smog-forming volatile organic compounds and nitrogen oxides will be reduced by 80% from current levels, particulate matter will be reduced by 70%, and fuel vapor emissions will be driven to near zero levels.

For more information on the emission reductions and the implementation timeline for these rules, please refer to the following EPA websites:

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-light-duty-vehicles-and-trucks-and>

<https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

https://theicct.org/sites/default/files/publications/ICCTupdate_Tier3_NPRM.pdf

Due to all the above emission standards for vehicles, the emissions in the transportation plan are being reduced in the future years due to fleet over turn although the VMT keeps increasing due to population increase.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Abhinav Kumar

Organization

Houston, Texas

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Good afternoon,

Please help the Houston-Galveston area be healthier. That means less car dependency, more options for walking, bicycling, and public transportation.

More lanes = more pain for our communities.

We're talking about a plan through 2040. Let's use our imagination and see if we can come up with something to be proud of! Any drunk could come up with the idea to add more lanes to the highway. Let's work smarter! Present a positive, uplifting, healthy, efficient, and new vision for the region.

People are dying of cancer and respiratory issues. More lanes will only make it worse.

Oh, and the Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA and USDOT's pause of the project.

Thank you for your time.

Sincerely,
Abhinav

Response

Thank you for comment on the Regional Transportation Plan and Air Conformity. H-GAC is dedicated to improving the lives and mobility of Greater Houston region. Recently, H-GAC published the Active Transportation Plan and the Regionally Coordinated Transportation Plan which outline the agency's strategies to the expansion of transit, bike, pedestrian transportation for the eight-county region. The NHHIP is included in the Regional Transportation Plan, TxDOT only seeks to update the existing project. H-GAC strives to balance in all modes of transportation while promoting health, safety, mobility, and economic growth.

TxDOT Response: "IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the projects inclusion in the 2045 RTP. "

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Joseph Higgs

Organization

Self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I'm a citizen concerned about how important this plan is and how little the average citizen knows about it or HGAC's existence. What efforts were made to inform the public using the media or community institutions?

I'd also like to know how much coordination there has been with other departments like Housing and Community Affairs. What are the holistic metrics of the impacts of Driving and Transit?

Response

Thank you for your interest in the 2045 RTP Amendments. H-GAC hosted more than 20 public meetings and open house events for the 2045 RTP and the 2018 "Call for Projects." H-GAC used social media, email lists, direct mailings, newspapers (legal notices and news articles), PSA announcements, TxDOT sign messaging, etc. to notify the public of the public meetings/workshops. Years of coordination take place with the City of Houston, and other major cities in the 8-county region; METRO and other transit authorities; counties of Harris, Waller, Fort Bend, Galveston, Chambers, Liberty and Montgomery; the Ports, etc. in developing the RTP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Martin Hagne

Submission Method

Online

Organization

Gulf Coast Bird Observatory

Date Comment Submitted

04/28/2021

Comment

Re: 2045 RTP

The map showing the study area for HWY 36A is too narrow and forces focus onto KPC lands. Even worse - a tentative and completely wrong illustration shows a possible route for 36A directly across lands that contain roosting areas for thousands of cranes, ducks and geese not to mention countless other forms of wildlife that are rapidly disappearing elsewhere in the HGAC area. The Katy Prairie Conservancy areas are valuable future environmental asset to the region.

These lands are critical as some of the very last remaining costal prairies in Texas. A habitat that is almost gone in its native state and supports countless animal forms, abates storm water and flooding, and so much more. It is imperative to not infringe on these native lands.

Thank you,

Martin Hagne

Executive Director

Gulf Coast Bird Observatory

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level. The June TAC/TPC amendment material will include the study area to represent Highway 36A projects 18719 and 18720.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

JAMES WINN

Submission Method

Online

Organization

INDIVIDUAL and Supporter of the Katy Prairie Conse

Date Comment Submitted

04/28/2021

Comment

My wife and I have financially supported the KPC for at least the past twenty (20) years. We have enjoyed many nature excursions there and many birding experiences there. PLEASE advocate for preservation of this prairie by prohibiting construction of Hwy 36A or any such public artery through it.

Respectfully yours,

James & Mary Winn

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Laura Robles Cisneros

Organization

Self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

Yo pienso que la población de Houston merece un mejor sistema de transporte, de tal manera que no tenga que lidiar con tanto tráfico ni que haya más contaminación.

Lo mejor para Houston sería el tren eléctrico, que sería más veloz y no afectaría la calidad del aire. Sería una gran solución para todos los que vivimos aquí.

Gracias por su amable atención.

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP. The 2045 RTP includes more focused plans such as Regional Active Transportation Plan, Congestion Mitigation Air Quality (CMAQ) Plan, Regional Safety Plan and Congestion Management Process to address the congestion, air quality and safety concerns in our region. For more details please see appendices to the 2045RTP at <http://www.2045rtp.com/documents.aspx>. (Spanish translation: Gracias por su interés en el RTP 2045. H-GAC agradece que se haya tomado el tiempo para expresar sus inquietudes. Estos comentarios serán considerados para el RTP 2050. El RTP 2045 incluye planes más específicos, como el Plan de transporte activo regional, el Plan de calidad del aire para mitigar la congestión (CMAQ), el Plan de seguridad regional y el Proceso de gestión de la congestión para abordar los problemas de congestión, calidad del aire y seguridad en nuestra región. Para obtener más detalles, consulte los apéndices del 2045RTP en <http://www.2045rtp.com/documents.aspx>.)

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Mariel Sanchez

Organization

Houston resident

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I am disappointed that with the expected population growth and knowledge of the negative impact cars have on the environment, the transportation plan is largely focused on highways. Expanding the highway system will only encourage more driving, therefore causing further environmental harm to our communities. Our region can do better than this. It would be good to see improvements and expansions of our public transportation system, for example. Why not invest in passenger/commuter trains, more efficient bus routes, and safer bike lanes? Please consider approaches with the goals of improving health, equity, and air quality for our and future generations, as opposed to creating more traffic on more highways.

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP. The 2045 RTP includes more focused plans such as Regional Active Transportation Plan, Congestion Mitigation Air Quality (CMAQ) Plan, Regional Safety Plan and Congestion Management Process to address the congestion, air quality and safety concerns in our region. For more details please see appendices to the 2045RTP at <http://www.2045rtp.com/documents.aspx>.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Greg Whittaker

Organization

Concerned Coastal Citizen

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I would strongly urge consideration for the preservation of the valuable natural habitat maintained by the Katy Prairie Conservancy. Gulf coastal prairie and grassland habitats are critical to hundreds of migratory and resident bird species and support a diverse, specialized ecosystem. The Katy Prairie Conservancy has assembled broad community support, political favor, and financial donations for the preservation of this critical habitat. To undermine this work goes against nearly 30 years of hard work.

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Niell Gorman

Organization

University of Houston

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

The Regional Transportation plan proposed by the Council includes a number of proposals that are not only outdated, but dangerous to the health and the long-term solvency of the region and its residents. The plan's prioritization of single-occupancy vehicles above more efficient and cost-effective forms of transportation contributes to a self-perpetuating loop of induced traffic demand, ballooning maintenance costs, increased flooding, air quality issues and other negative outcomes.

The H-GAC assumes a 61% increase in population will lead to a corresponding 61% increase in single-occupancy vehicle travel. The projects in the RTP should be determining future outcomes, not being influenced by presumed outcomes. Please provide a data based justification used to estimate a 61% increase in vehicle usage.

The Proposed Amendment to the 2045 RTP should not include Segment 3 of the NHHIP because of the FHWA's and USDOT's pause of the project.

Has Texas Central approved the Hempstead Road elevated managed lanes project? The construction of a highway next to US290 appears to be redundant and wasteful. Please provide record of input from Texas Central on project #18706, and justification for 18701, 18702, 18703, 18704, and 18705.

Please provide and explain the relationship between the two air quality standards in question—the EPA's NAAQS ozone standard and TCEQ's MVEB targets

Please include discussion of air quality related health risks and benefits- a 61% increase in single occupancy vehicles, even including greater adoption of electric vehicles, would be catastrophic to air quality and health in the Houston-Galveston region. The council should work to address the air quality issues that already exist and embrace new travel solutions, rather than advocating for continuous highway expansion that will induce worse traffic and incur high maintenance costs in the future.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single -occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes. The 2045 RTP includes more focused plans such as Congestion Mitigation Air Quality (CMAQ) Plan, Regional Safety Plan and Congestion Management Process to address the congestion, air quality and safety concerns in our region. For more details please see appendices to the 2045RTP at <http://www.2045rtp.com/documents.aspx>.

The NHHIP is included in the Regional Transportation Plan, TxDOT only seeks to update the existing project. Texas Central is not responsible for the approval of capital projects, nor is the organization's input required. The Hempstead Road construction will provide traffic an alternate route to US 290.

For your comment regarding the relation between the national ambient air quality standard (NAAQS) and the motor vehicle emission budgets (MVEBs): The air quality state implementation plan (SIP) is the state's comprehensive plan to clean the air and meet federal air quality standards. Our region is in nonattainment for ozone and TCEQ is the state agency to prepare the air quality SIP. To prepare the SIP, the state agency must consider all sources of air pollution in the region, like industrial emissions, mobile on-road emissions, non-road emissions (construction equipment), off-road emissions (locomotives, airports, commercial marine), area emission (residential and small business). The emission inventories for the sources of air pollution are generated and input into the photochemical model to get the concentration of ozone for the attainment year. Air quality control strategies are being also included into the model to attain the standard. Based on this exercise, on-road mobile sources get a quota of up to how much they can emit to reach the standard and that quota is called the Motors Vehicle Emission Budget (MVEB). Conformity is the exercise that shows that all the emissions coming from the transportation plan for a given year do not exceed the MVEB, in other words, the emissions coming from the transportation plan do not delay the attainment of the ozone standard. For our next conformity determination, H-GAC will consider the addition of a discussion regarding air pollution and health effects.

See response for your comments on NHHIP segment 3 and Hempstead Road projects from TxDOT below:

IH 45, Segment 3 (North Houston Highway Improvement Project)

Segment 3 of the of the NHHIP is already included in the 2045 RTP. This amendment includes a change to the existing project. The Federal Highway Administration's review of the NHHIP does not preclude the projects inclusion in the 2045 RTP.

Hempstead

The Hempstead project from I-610 to BW8 currently exists in the 2045 RTP. Hempstead Road between I-610 and Beltway 8 will undergo a

feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder and public involvement.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Jay Farris

Organization

self

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I've read through these plans and they do not seem to address congestion or environmental issues. As a planner (Masters in Planning from University of Tokyo) who enjoys seeing how systems fit together, there are a few things that I don't understand.

Why would we spend money on adding lanes to roadways rather than diversifying modes? Can anyone provide a single example when that has worked over the long term? Is there any information on the air quality changes that would come from that kind of encouragement for driving?

The information all seems to assume a huge increase in private car usage. Why would it be based on presumptions rather than looking at movement patterns and future options.

It just looks like more congestion in the making.

Response

Thank you for your comment on the Regional Transportation Plan and Air Quality comment page. H-GAC values your input. The 61% growth in single-occupancy vehicle usage coming from fact sheet 2 (<http://www.2045rtp.com/documents/2045-fact-sheet2.pdf>) was developed as a promotional material for first round of public involvement meetings conducted during the development of 2045 RTP process in spring of 2018. 61% of estimated population growth was applied to vehicle ownership (5.5 million) data from 2017. This estimated vehicle ownership growth was not used in the project selection process. The agency provides a public data lab ([Link](#)) and documentation ([Link](#)) explaining its forecasting processes. The 2045 RTP includes more focused plans such as Regional Active Transportation Plan, Congestion Mitigation Air Quality (CMAQ) Plan, Regional Safety Plan and Congestion Management Process to address the congestion, air quality and safety concerns in our region. For more details please see appendices to the 2045RTP at <http://www.2045rtp.com/documents.aspx>.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Peter Gottschling

Submission Method

Online

Organization

GCBO supporter

Date Comment Submitted

04/28/2021

Comment

As a former resident of the Houston area I have seen tremendous habitat destruction in the Katy Prairie area over the last 30 years. Proposing a highway through the middle of it seems appalling. It will only lead to more loss of habitat not just from highway construction but with the development it will promote in the future. Please find an alternate route.

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

William Dickson

Organization

Katy Prairie Conservancy / Gulf Coast Bird Observa

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

No time for a proper comment except to register opposition to road-building across such a valuable asset as the Katy Prairie. It presents the ability to absorb storm waters, feed and shelter migratory birds and improve the Houston area ability to attract 'birders', with their associated spending. The same comments that apply to considering alternative forms of transport to the widening of I-45 apply here. Building roads simply increases overall traffic volume and diminishes our assets. You can do better!

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Gary Clark

Organization

Gulf Coast Bird Observatory

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

I'm a former vice-president of the board of the Gulf Coast Bird Observatory, a former president of Houston Audubon, and life-long advocate for the Katy Prairie. I've spent a lifetime studying the flora and fauna of the Katy Prairie, and I've written numerous articles about it in magazines and the newspaper. It is a priceless heritage to future generations, a remnant of a once vast prairie ecosystem. HWY 36A would erase the most valuable section of what's left of that ecosystem. Surely, you don't want that on your conscience.

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Lynne Aldrich

Submission Method

Online

Organization

Gulf Coast Bird Observatory

Date Comment Submitted

04/28/2021

Comment

The Katy Prairie Conservancy has worked with groups throughout Texas in attempts to preserve the critical habitat required to assure that valuable lands are preserved in perpetuity that support a large portion of migrating birds - cranes, ducks and geese as well as other wildlife. The Katy Conservancy lands have been the major source of survival for these migrating birds and are in danger once again of being destroyed - and along with that destruction the loss of not only this critical habitat but the birds that rely upon it for their survival and the opportunity that thousands of individuals would have to continue to see these magnificent creatures in their beauty in a natural prairie habitat.

As a member of The Gulf Coast Bird Observatory - another organization that works hard to preserve land valuable for the sustainment of migrating birds - I wish to give my strong opposition for the proposed highway cutting through these lands. The last remnants of the Katy Prairie simply cannot and should not be put in jeopardy and an alternative plan should be created that will assure this preservation.

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Jackie Hicks

Organization

Gulf Coast Bird Observatory

Submission Method

Online

Date Comment Submitted

04/28/2021

Comment

We value the Katy Prairie from a Gulf Coast Bird Observatory perspective and are very upset by the current hwy 36A expansion plans

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

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The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Tony Frank

Submission Method

Online

Organization

National Audubon Society (Texas affiliation)

Date Comment Submitted

04/28/2021

Comment

I think the proposed route of highway 36A running through the Katy Prairie is very short-sighted. This route would remove what little prairie that is left in the area that has thousands of wintering cranes, ducks, and geese. There also other wildlife that uses this habitat year-round. The support of our elected officials in the past for the Katy Prairie Conservancy areas was vital and is still needed to keep the prairie a viable eco-area. Once a highway goes through this region, then many housing subdivision, strip malls, and other support industries will start appearing (i.e., look what happened as soon as Beltway 8 was built and is currently happening around the Grand Parkway) which means the end of the Katy Prairie as a viable wildlife habitat. This would be a shame to let it happen. There needs to be strong leadership to take a stand and allow wildlife to be a guiding (and remaining) force for this world instead of faster transportation (and mega profits for the a few land grabbing people.)

Thanks for your attention,

Tony Frank
Houston, Texas
Gtbc03@aol.com

Response

Thank you for your participation and comment. We will take the points of your comment into consideration. As stated in Transportation Policy Council Resolution 2014-01 (attachment) "the Katy Prairie is a significant natural regional resource that should be preserved and enhanced for the benefit of current and future generations and, although all feasible alternatives should be investigated in this study, it is neither the intention nor in the regional interest to build 36A on land that is currently under control or ownership of the Katy Prairie Conservancy." H-GAC is committed to an inclusive "grass roots" planning process utilizing the guidance of key stakeholders at the corridor and segment level.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. Our study methodology always seeks to avoid potential impacts. If impacts cannot be reasonably avoided, we try to minimize the impact; and only then do we mitigate the impacts of a project. This alternatives alignment process is very prescribed and consistent with federal and state practices. The process also includes extensive stakeholder and public engagement.

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Corbett L. Freeman

Organization

N/A

Submission Method

Email

Date Comment Submitted

04/27/2021

Comment

As a resident of Pearland, we are against an elevated segment of SH 35 coming through the City of Pearland. There is too much development South of FM 518 to accomplish this. It was possible 15-20 years ago, but not now. It will either take too many homes or too many business that employ residents. It will divide our community further and create many corresponding nuisances/issues for residents. If an elevated freeway through Pearland is the intent of adding SH 35 to the TIP, please do not consider adding it to the plan. Alternatives could be limited elevated/depressed sections and innovative intersections at existing signals.

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: The need for SH 35 improvements from Dixie Drive and continuing south to future SH99 is just beginning. The Texas Department of Transportation has scrapped the previous plans for S 35 and is staring over in the feasibility process. Our process for corridor studies involves both a quantitative and qualitative process that features extensive stakeholder and public engagement and input before finalizing a proposed improvement concept. We believe including the project in the 2045 RTP puts the public on notice that we intend to study the corridor because this corridor is vital to the transportation system. Improvements are anticipated to move people and good more reliably.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Harrison Humphries

Organization

Air Alliance Houston

Submission Method

Email

Date Comment Submitted

04/28/2021

Comment

Attached are Air Alliance Houston's public comments regarding the Draft 2021 Transportation Conformity and the proposed 2045 Regional Transportation Plan amendments. Also attached is a public comment recently submitted to the EPA regarding the Texas SIP that we would like included as part of our public comment.

[View Attached Letter](#)

[View Additional Attachment](#)

Response

Thank you for submitting your comments and corections regarding Chapter 4. This chapter has been updated and reposted in the conformity document.

H-GAC also wants to thank you for submitting to us the letter that you, Earthjustice and Sierra Club sent to EPA. H-GAC agrees with you regarding more and new air quality control strategies needed to reach the new ozone standards.

Regarding your comment on NHHIP and IH 10VV/Inner Katy projects, a response from TxDOT is attached.



H-GAC Staff
3555 Timmons Lane, Suite 100
Houston, TX 77027

To whom it may concern,
Below are Air Alliance Houston's public comments regarding the Draft 2021 Transportation Conformity and the proposed 2045 Regional Transportation Plan amendments.

Air Quality Conformity

Air Alliance Houston appreciates the opportunity to comment on these documents. In the Air Quality Conformity documents, we've noted a number of discrepancies and/or mistakes. We've listed them below:

- In the "Estimation of Vehicle Activity" section (pg. 14), the document states the previous conformity was conducted in 2015 and 2016 for the 2040 RTP. This is incorrect. The previous conformity was conducted in 2018 and 2019 for the 2045 RTP.
- In the same section on the following page (pg. 15), the document states multiple times that the base model year for traffic counts is 2012. However, Appendix 4 (which this section references) shows a base year 2016 model. Page 2 of the "Executive Summary" document asserts that conformity requires the "latest planning assumptions" to be employed; was the 2012 or 2016 model used? Either the conformity employed old metrics or the conformity document is wrong.
- The tables on page following (pg. 16) are confusing and should be clarified. In addition to not being clearly explained, the two tables use two different projection years (2040 vs 2045). Is there a deliberate reason for this?
- Table 4.3 (pg. 20) again references the 2012 base year model
- 4.7.2 claims that Table 4.7 shows centerlane miles for each conformity year, but those are not the conformity years.

Beyond these errors in the regional conformity document, our organization has concerns about the approach to regional air quality overall. The control strategies detailed in the new State Implementation Plans are the same control strategies the region has committed to in previous State Implementation Plans (SIP), yet our region continues to fail to meet the ozone standards. In fact, the EPA advanced our region to "serious" nonattainment in its most recent ruling. Why is the H-GAC continuing to advance control strategies that have proven to be insufficient?

Air quality conformity should not be treated as an obstacle to be circumvented in order to continue building infrastructure without consequence. Resubmitting old and failed control strategies to be included in the SIP, in addition to the lack of focus paid to the conformity

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documents, suggests that the H-GAC does not consider our region's failing air quality a serious issue. We ask that the H-GAC correct the errors in the document, clarify if the conformity is based on 2012 or 2016 base year models, and consider committing to more stringent control strategies for mobile sources, like the creation of mass transit projects instead of favoring adding capacity projects that generate more air pollution and congestion like the NHHIP.

RTP Amendments

Our organization, Air Alliance Houston, is opposed to three proposed amendments to the 2045 RTP: MPOIDs 18708, 18709, and 16328. The first two amendments represent TxDOT's proposals for additional managed lanes along the I-10 corridor. Although TxDOT released video presentations and documents supporting the proposed project, and held a virtual open house, TxDOT has failed to demonstrate the need for this project. Below are comments our organization submitted to TxDOT earlier this year on their proposals:

Our organization is skeptical of TxDOT's stated need for the I-10 Inner Katy Corridor Managed Lanes Project and disagrees with TxDOT's assessment that the project will yield any significant benefit to travel times. TxDOT's proposals appear to be a continuation of a pattern of adding capacity for passenger vehicles (and, as a result, SOVs) at the expense of transit and communities along the proposed corridor. TxDOT has continuously used population growth projections as a justification for expanding highways, but population growth in a vacuum is not an appropriate rationale for moving this project forward. We've seen similar rationales used to support projects like the North Houston Highway Improvement Program, which has resulted in inaccurate depictions of our region's actual transportation needs.

Noticeably absent from TxDOT's paltry list of facts and figures meant to justify the need for the project is any figure of traffic volumes from the past five-to-ten years on this corridor, (peak hour traffic for 2019 is given, but is only compared to a 2045 projection, and no other trend is identified or given). Also absent was any explanation of how this project fits into local entities' visions for transportation infrastructure in our region or any consideration or analysis of how the COVID-19 pandemic will alter transportation usage going forward. Any preliminary considerations of air quality or greenhouse gas emission impacts are also concerningly absent.

Our organization is also unsure of TxDOT's preferred alternatives presented. There is little information given on how TxDOT arrived at these designs, or why additional Right of Way is needed. We believe it is disingenuous to present these designs to the public as the three best options for improving travel on this corridor; TxDOT must consider consulting communities prior to creating designs, or else we will continue to see projects that have little justification and minimal support from the general public.

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AAH is concerned that construction will disrupt or delay construction for METRO's timeline, and that the added managed lane infrastructure will make accessing METRO's BRT more difficult.

We have not received a response from TxDOT. Several other organizations and individuals submitted comments on these proposals; TxDOT has failed to respond to any of them. While we understand that the amendment to add the project to the RTP is more administrative than substantive, our organization generally opposes token public engagement and feels that TxDOT should respond to comments received prior to advancing this project to the next stage. Failing that, the H-GAC should hold its project sponsors accountable by refusing to advance the amendment until a genuine public engagement process takes place and actual need for the project is demonstrated.

Air Alliance Houston opposes the amendment for MPOID 16328 because TxDOT and the NHHIP are subject of an ongoing civil rights investigation. Additionally, the Federal Highway Administration (FHWA) has ordered TxDOT to halt all further action on the project. During one of the RTP open houses conducted in April 2021, H-GAC MPO Director Craig Raborn explained that the agency does not believe advancing this amendment would be in conflict with the FHWA's orders. Our organization would like to receive clarity on this statement - did the FHWA communicate this information directly to the H-GAC? If so, is there documentation? If not, our organization holds concerns that the H-GAC could be advancing a TxDOT project against an FHWA directive. Regardless of the technicality of the issue, though, AAH believes that the intention of the FHWA halt order is clear and that the H-GAC should act in good faith with the order by denying the amendment.

Sincerely,

Harrison Humphreys
Transportation Policy Advocate
Air Alliance Houston

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a: 2520 Caroline Street, Suite 100, Houston, TX 77004 | p: 713.528.3779 | w: airalliancehouston.org

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P.O.BOX 1386, HOUSTON, TEXAS 77251-1386 | 713.802.5000 | WWW.TXDOT.GOV

June 15, 2021

Mr. Craig Raborn, AICP
Director, Transportation Planning
Houston-Galveston Area Council (H-GAC)
3555 Timmons Lane, Suite 120
Houston, Texas 77027

RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan (RTP)

Dear Mr. Raborn:

This letter is in response to Air Alliance Houston's (AAH) undated correspondence regarding comments on the Houston-Galveston Area Council's (H-GAC) 2045 Regional Transportation Plan (RTP) Amendments.

The Texas Department of Transportation (TXDOT) will not respond to comments from AAH regarding the Air Quality Conformity documents. H-GAC, as the entity responsible for the long-range plan and associated air quality conformity process, and its air quality expert and AAH Board Member, Graciela Lubertino, PhD is better suited to address those questions.

**I-10 West from I-610 West to I-45 and I-10 West from Studemont to Houston Avenue
The Inner Katy Corridor Project**

The I-10 west (Inner Katy) Corridor is a high-volume facility in terms of passenger and freight movement with limited right of way (ROW) for future improvements. This section of roadway carries nearly 275,000 vehicles per day including Single Occupancy Vehicles (SOV), carpools, vanpools, and buses. Nearly eight (8) percent of the corridor's traffic is freight. The Metropolitan Transit Authority of Harris County (METRO) Inner Katy Bus Rapid Transit (BRT) Project will impact the State's ROW and the interstate facility. The identification of existing and future transportation needs for the movement of people and goods within the I-10 Inner Katy Corridor and beyond is paramount to ensure TXDOT can adequately respond to METRO's inclusion of the proposed Inner Katy BRT currently programmed for construction in the H-GAC's Transportation Improvement Program (TIP).

TXDOT must better understand the physical space ramifications and other impacts these proposed improvements will have on the I-10 Inner Katy Corridor. The I-10 Inner Katy Corridor Study is a direct response to the Inner Katy BRT implementation project. Otherwise, TXDOT would be evaluating METRO's Inner Katy BRT project without the necessary information to make sound engineering decisions about the future of the corridor. To our knowledge, the METRO Inner Katy BRT project does not have enough project level environmental or engineering detail to determine impacts to the human environment, TXDOT's facility, or the surrounding natural and built environment. Because of the lack of basic project level information on the BRT Project, the fact that the project was included in the H-GAC long-range plan, was funded in the TIP for construction, and the certain impact to our facility, TXDOT initiated the I-10 Inner Katy Study so that we could collaboratively develop a shared vision for the future of the I-10 Inner Katy Corridor.

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TXDOT acknowledges that in the days following the federal disaster declaration related to the COVID-19 pandemic, traffic volumes dropped substantially and remained low in the following months. This is supported by the Regional Travel Impacts of COVID-19 report prepared by H-GAC and presented at the May 21, 2021, Transportation Policy Council (TPC) meeting. The report indicated that while traffic volumes initially dropped, the volumes rebounded and as of "September 4, 2020, the Friday of Labor Day weekend, that travel volumes were equal to or greater than the baseline volume." The report goes on to say that travel volumes have hovered at approximately 80 percent of the pre-COVID volumes. TXDOT's own data shows that traffic volumes are at or near pre-COVID volumes.

The Governor has declared the State open and businesses are returning to normal. TXDOT anticipates higher-than-normal traffic volumes as many individuals may shift from transit to SOV for personal health reasons. In addition, traffic patterns may have changed. For instance, in addition to fewer people using transit, there may be fewer people traveling from home to work during peak periods and more people may be running errands during the day. Nevertheless, the volumes have rebounded, therefore telecommuting does not seem to have had a significant impact on the State's transportation system.

TXDOT has a long-standing history of providing a robust and equitable transportation system that has served as the State's transportation backbone providing critical access to opportunities and facilitating job creation and economic prosperity. The system is extremely efficient. The State system represents 26 percent of the public roads in Texas and, yet, it carries 72 percent of the vehicle miles traveled.

The Houston region is a microcosm of the State. As the fourth largest city in the nation, Houston and the surrounding region can credit the historical collaboration and cooperation of regional leadership for having had the vision to make the tough decisions and investments needed to bring us to today's regional transportation network. The TXDOT Houston District has not wavered from its commitment to this collaboration and cooperation, but we do not serve one (1) constituency or mode choice more ardently than any other. Our primary concern is safely moving people and goods in the entire region and beyond.

The TXDOT Houston District strives for excellence on every project and to serve equally the nearly seven (7) million regional residents – from those in the dense, urban core of Harris County (County) to those in rural areas of Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, and Waller Counties. We are especially concerned about those that are most vulnerable.

To accomplish TXDOT's mission, we use some of the most rigorous industry methods to develop our portfolio of projects and to move those projects through project development toward implementation. There is a myriad of scientific methods TXDOT uses and studies we perform to make decisions about the need for investment and to determine the types of improvements that are required to meet public needs. Our improvements follow industry-standard, federal, and state guidelines for engineering analysis and always consider environmental impacts. Whatever study method is employed, every project goes through the National Environmental Policy Act (NEPA) clearance process and TXDOT's major projects also go through stakeholder engagement and the public involvement process.

TXDOT's stakeholder and public engagement process is second to none in the Houston region. No other local government or transportation agency goes through the extensive and rigorous project level public involvement that we do. In fact, other agencies should be held to the same high standard. TXDOT's level of engagement is appropriate given the diversity of use and volume of vehicles we accommodate within the region including SOV, carpools, vanpools, buses, and freight haulers. We are not focused on 1 mode choice over the other. That is not TXDOT's mission. We move people and goods across a ground transportation system in whatever mode choice the user decides is appropriate.

TXDOT's process for corridor studies involves both a quantitative and qualitative process that features extensive stakeholder and public engagement and input before finalizing a proposed improvement concept. We believe including the project in the 2045 RTP puts the public on notice that we intend to study the corridor because this corridor is vital to the transportation system. Improvements are anticipated to move people and goods more reliably.

To date, TXDOT and METRO have worked collaboratively and cooperatively to identify and share information for the benefit of the traveling public. We have successfully delivered a joint Virtual Public Meeting event for the Inner Katy Corridor that showcased the METRO Inner Katy BRT Project while also soliciting input concerning the existing and future transportation needs of the broader corridor. It is the identification of the needs and the discussion of potential solutions for which TXDOT is currently seeking an amendment to the 2045 RTP. Including the Inner Katy Corridor Study in the H-GAC long-range plan is the start of a conversation about the future of this vital corridor. We would not want the implementation schedule for METRO's Inner Katy Project to be adversely impacted if TXDOT's Inner Katy Project is not included in the 2045 RTP. Without inclusion of TXDOT's Inner Katy Project in the RTP, TXDOT will not be able to make sound engineering decisions about the future development of the corridor.

I-45 at I-10 (MPOID 16328)

The I-45 at I-10 project already exists in the 2045 RTP and the associated conformity determination. In fact, this project has been included in the Region's long-range plan for many years. The characterization by AAH that the Federal Highway Administration (FHWA) "has ordered TXDOT to halt all further action on the North Houston Improvement Project" (NHHIP) is patently false. FHWA requested "that TXDOT pause before initiating further contract solicitation efforts until FHWA has completed its review and determine whether any further actions may be necessary to address those concerns." This FHWA request and its on-going Title VI (6) investigation do not preclude the project's inclusion in the Region's long-range plan nor has the State been enjoined from conducting project development activities.

With that said, TXDOT does want to move people as efficiently and cleanly as possible across our system. We need to reduce emissions. TXDOT has invested in projects that help users do just that. One example is our Houston ConnectSmart Project, which seeks to level out the Bell Curve of congestion over time, space, and ultimately mode in the eight (8) county region. We want to make Houston more connected and less congested. By providing users with better information and personalized travel options such as carpool, vanpool, and bus options, and rewarding them for their congestion-relieving decisions, TXDOT believes users are empowered to help us achieve our Vision Zero goal and, ultimately, will reduce vehicle miles traveled and improve our region's air quality. These choices will be made by users while riding on some of the safest and most comfortable facilities in the region. Cleaner air and improved safety require a comprehensive approach of engineering and technology solutions to get TXDOT where we want to be with respect to safety and climate. We are committed.

In summary, TXDOT recommends that the TPC approve the 2045 RTP Amendments as submitted. This will enable us to work cooperatively and collaboratively to plan for the orderly growth and development of the ground transportation system and to foster increased economic vitality and enhanced access to opportunities through more efficient movement of people and goods in the 8-county region and beyond.

TXDOT is unwavering in its commitment to provide high-quality, safe multimodal transportation that is accessible to everyone in the region and beyond. Our facilities are not limited to the SOV. Any ground transportation mode can access TXDOT's facilities, subject to appropriate laws. We do not believe it's in the Region's best interest to cause congestion by limiting or reducing capacity improvements to the State system to spur behavior change toward higher occupancy commuting and transit ridership. The improvements TXDOT provides are not only for capacity, our improvements increase safety and enhance the driving experience by creating a facility that operates more comfortably for all modes. H-GAC's long-range plan indicates the Region's population will swell to nearly 11 million by 2045. It will take all of us working together to provide an integrated and robust ground transportation system that provides users options, so they can decide which mode meets their needs.

TXDOT is unwavering in its commitment to continually work with regional transportation partners and the nearly 7 million constituents in the Houston-Galveston-Brazoria-Woodlands-Conroe Transportation Management Area to ensure they all have a voice in the State planning process. This continuous cooperation and collaboration are fundamental to achieving the Region's mission of improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity.

Thank you for the opportunity to respond. Should you have any questions please contact my office at (713) 802-5001 or via email at eliza.paul@txdot.gov.

Sincerely,



Eliza C. Paul P.E.
District Engineer
Houston District

Attachment

CC: James W. Koch, P.E., Director, Transportation Planning and Development,
Houston District, TXDOT
Andrew C. Mao, P. E., Director, Advanced Transportation Planning, Houston District, TXDOT
Vishu Lingala, H-GAC
Harrison Humphreys, Transportation Policy Advocate, Air Alliance Houston



H-GAC Staff
3555 Timmons Lane, Suite 100
Houston, TX 77027

To whom it may concern,
Below are Air Alliance Houston's public comments regarding the Draft 2021 Transportation Conformity and the proposed 2045 Regional Transportation Plan amendments.

Air Quality Conformity

Air Alliance Houston appreciates the opportunity to comment on these documents. In the Air Quality Conformity documents, we've noted a number of discrepancies and/or mistakes. We've listed them below:

- In the "Estimation of Vehicle Activity" section (pg. 14), the document states the previous conformity was conducted in 2015 and 2016 for the 2040 RTP. This is incorrect. The previous conformity was conducted in 2018 and 2019 for the 2045 RTP.
- In the same section on the following page (pg. 15), the document states multiple times that the base model year for traffic counts is 2012. However, Appendix 4 (which this section references) shows a base year 2016 model. Page 2 of the "Executive Summary" document asserts that conformity requires the "latest planning assumptions" to be employed; was the 2012 or 2016 model used? Either the conformity employed old metrics or the conformity document is wrong.
- The tables on page following (pg. 16) are confusing and should be clarified. In addition to not being clearly explained, the two tables use two different projection years (2040 vs 2045). Is there a deliberate reason for this?
- Table 4.3 (pg. 20) again references the 2012 base year model
- 4.7.2 claims that Table 4.7 shows centerlane miles for each conformity year, but those are not the conformity years.

Beyond these errors in the regional conformity document, our organization has concerns about the approach to regional air quality overall. The control strategies detailed in the new State Implementation Plans are the same control strategies the region has committed to in previous State Implementation Plans (SIP), yet our region continues to fail to meet the ozone standards. In fact, the EPA advanced our region to "serious" nonattainment in its most recent ruling. Why is the H-GAC continuing to advance control strategies that have proven to be insufficient?

Air quality conformity should not be treated as an obstacle to be circumvented in order to continue building infrastructure without consequence. Resubmitting old and failed control strategies to be included in the SIP, in addition to the lack of focus paid to the conformity

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documents, suggests that the H-GAC does not consider our region's failing air quality a serious issue. We ask that the H-GAC correct the errors in the document, clarify if the conformity is based on 2012 or 2016 base year models, and consider committing to more stringent control strategies for mobile sources, like the creation of mass transit projects instead of favoring adding capacity projects that generate more air pollution and congestion like the NHHIP.

RTP Amendments

Our organization, Air Alliance Houston, is opposed to three proposed amendments to the 2045 RTP: MPOIDs 18708, 18709, and 16328. The first two amendments represent TxDOT's proposals for additional managed lanes along the I-10 corridor. Although TxDOT released video presentations and documents supporting the proposed project, and held a virtual open house, TxDOT has failed to demonstrate the need for this project. Below are comments our organization submitted to TxDOT earlier this year on their proposals:

Our organization is skeptical of TxDOT's stated need for the I-10 Inner Katy Corridor Managed Lanes Project and disagrees with TxDOT's assessment that the project will yield any significant benefit to travel times. TxDOT's proposals appear to be a continuation of a pattern of adding capacity for passenger vehicles (and, as a result, SOVs) at the expense of transit and communities along the proposed corridor. TxDOT has continuously used population growth projections as a justification for expanding highways, but population growth in a vacuum is not an appropriate rationale for moving this project forward. We've seen similar rationales used to support projects like the North Houston Highway Improvement Program, which has resulted in inaccurate depictions of our region's actual transportation needs.

Noticeably absent from TxDOT's paltry list of facts and figures meant to justify the need for the project is any figure of traffic volumes from the past five-to-ten years on this corridor, (peak hour traffic for 2019 is given, but is only compared to a 2045 projection, and no other trend is identified or given). Also absent was any explanation of how this project fits into local entities' visions for transportation infrastructure in our region or any consideration or analysis of how the COVID-19 pandemic will alter transportation usage going forward. Any preliminary considerations of air quality or greenhouse gas emission impacts are also concerningly absent.

Our organization is also unsure of TxDOT's preferred alternatives presented. There is little information given on how TxDOT arrived at these designs, or why additional Right of Way is needed. We believe it is disingenuous to present these designs to the public as the three best options for improving travel on this corridor; TxDOT must consider consulting communities prior to creating designs, or else we will continue to see projects that have little justification and minimal support from the general public.

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AAH is concerned that construction will disrupt or delay construction for METRO's timeline, and that the added managed lane infrastructure will make accessing METRO's BRT more difficult.

We have not received a response from TxDOT. Several other organizations and individuals submitted comments on these proposals; TxDOT has failed to respond to any of them. While we understand that the amendment to add the project to the RTP is more administrative than substantive, our organization generally opposes token public engagement and feels that TxDOT should respond to comments received prior to advancing this project to the next stage. Failing that, the H-GAC should hold its project sponsors accountable by refusing to advance the amendment until a genuine public engagement process takes place and actual need for the project is demonstrated.

Air Alliance Houston opposes the amendment for MPOID 16328 because TxDOT and the NHHIP are subject of an ongoing civil rights investigation. Additionally, the Federal Highway Administration (FHWA) has ordered TxDOT to halt all further action on the project. During one of the RTP open houses conducted in April 2021, H-GAC MPO Director Craig Raborn explained that the agency does not believe advancing this amendment would be in conflict with the FHWA's orders. Our organization would like to receive clarity on this statement - did the FHWA communicate this information directly to the H-GAC? If so, is there documentation? If not, our organization holds concerns that the H-GAC could be advancing a TxDOT project against an FHWA directive. Regardless of the technicality of the issue, though, AAH believes that the intention of the FHWA halt order is clear and that the H-GAC should act in good faith with the order by denying the amendment.

Sincerely,

Harrison Humphreys
Transportation Policy Advocate
Air Alliance Houston

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Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Jonathan P. Brooks

Organization

LINK Houston

Submission Method

Email

Date Comment Submitted

04/28/2021

Comment

Please find attached our comments on the proposed amendments to the 2045 Regional Transportation Plan.

[View Attached Letter](#)

Response

A response from TxDOT is attached

April 28, 2021

Transportation Policy Council (TPC)
Craig Raborn, Transportation Director
Houston-Galveston Area Council (H-GAC)

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Oni K. Blair

RE: Comments on proposed 2045 Regional Transportation Plan amendments

Dear Mr. Raborn and TPC Members:

We submit these comments in response to the two virtual public meetings held by H-GAC on Thursday, April 8, 2021, to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). People should be able to reach such opportunities in the Houston region safely and with dignity by walking, rolling, biking, and riding transit. These deeply affordable options must be as viable as those afforded by people able to, or choosing to, own and operate personal vehicles. To that end, LINK Houston advocates for a robust and equitable transportation network so that all people can reach opportunity. We strive to be anti-racist and center equity and climate justice in all we do.

Several of the proposed RTP amendments are major highway infrastructure concepts for corridors in Houston through existing residential and commercial development. We have serious concerns about the proposed scope and schedules of these proposed additions to the region's 2045 Regional Transportation Plan. The amendments are not for projects in the distant future. Rather, the amendments requested by the Texas Department of Transportation (TxDOT) propose construction beginning by 2030, within the 10-year Transportation Improvement Program (TIP) program of projects. This gives rise to our primary concern and why we ask TPC to not accept the amendments to the RTP.

TxDOT is premature and acting on outdated concepts. TPC should reject the TxDOT amendments and instead provide leadership by directing the agency to thoroughly implement the federally required process to engage communities and interagency partners to:

- (1) Identify if a project is actually warranted and to identify need and purpose (i.e., following the Planning and Environmental Linkages (PEL) process);
AND THEN IF WARRANTED...**
- (2) Explore a full suite of project alternatives through interagency cooperative planning and in concert with directly adjacent communities (i.e., develop alternatives that satisfy the "critical links between transportation needs and other societal goals").**

The Federal Highway Administration (FHWA) *Transportation Planning Process Briefing Book* states the following in the introduction,

"The performance of the transportation system also affects public policy concerns, such as safety, air quality, environmental resource consumption, social equity, resilience, land use, urban growth, economic development, and security. Transportation planning recognizes the critical links between transportation needs and other societal goals." [emphasis added]

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments will bypass the Planning and Environmental Linkages process



which is intended by Congress and FHWA to accelerate project delivery with early cooperative and comprehensive planning. According to the FHWA webpage,

"Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that 1) considers environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analysis, and products developed during planning to inform the environmental review process."

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LINK Houston believes thorough community engagement to develop qualitative data and thorough quantitative analysis of transportation demand, travel patterns, and environmental impacts are both warranted given travel preference trends and technologies, recent telework experience, and technological advances changing how and when people and goods move. Data from these analyses will impact the need and purpose for each project. The PEL process, quantitative data analysis, and qualitative data from engagement must be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated.

The proposed amendments are for transportation projects inseparably connected with other goals and plans. The City of Houston Climate Action Plan, Resilient Houston, Vision Zero Strategy, the METRONext Moving Forward Plan, and other local plans are all more recent than the outdated thinking behind TxDOT's requested amendments. Houston and the region deserve better. We can do better. Our residents and businesses need us to be better. **One way to stretch and be better is for TPC to require project sponsors to incorporate locally supported goals and plans into the purpose and need for corresponding projects.** For example, projects within the City of Houston must incorporate goals from the Climate Action Plan, such as to "Reduce Vehicle Miles Travelled per capita 20% by 2050."

LINK Houston suggests TPC instruct H-GAC staff to conduct a study, including extensive public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP. The combined Inner Katy Managed Lanes, I-610 W Managed Lanes, and Hempstead Highway Managed Lanes proposed as amendments to the 2045 RTP with 2026-2030 construction dates seem to indicate an intent to construct core elements of a regional express access lane concept. Initiation of federal environmental review for the Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes seems premature given that a network of interconnected elevated express lanes remains a planning-level concept. The vision of a regional elevated express lane network has not been vetted with the public, reviewed, or approved by the H-GAC Transportation Policy Council, nor contemplated in the 2045 Regional Transportation Plan adopted by the agency responsible for regional transportation planning less than two years ago in May 2019.

The benefits and burdens of transportation policies and systems should be equitably allocated across communities so we collectively address past harm and neglect to ensure that all people can reach opportunities in the future. The 2045 RTP states that,

"H-GAC's mission is to plan for the orderly growth and development of the region, working in concert with multiple planning partners. This mission involves building region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity."



The public expects H-GAC to fulfill its mission. Likewise, the public expects TPC to provide leadership built upon the foundation of sound thinking and fair representation – with deep mutual respect for members representing the locations where projects occur.

Thank you for the opportunity to provide comments on the proposed amendments to the 2045 RTP.

Sincerely,



Oni K. Blair
Executive Director
LINK Houston

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P.S. Below are project-specific comments on proposed RTP amendments. We make these additional comments in full support of the City of Houston's, residents', and business owners' posted comments.

Hempstead Highway/Road

Proposed Amendment: Reconstruct Hempstead Road and add one transit lane in each direction at grade and construct 4 elevated managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Elevated lanes have not been coordinated.
- Significant work funded by H-GAC has focused on development of commuter rail in the Hempstead corridor. This does not appear to have been considered or recommended.
 - The H-GAC High-Capacity Transit Framework approved by TPC states, "Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways."

I-10 W from I-610 W to I-45 N

Proposed Amendment: Reconstruct 10 mainlanes and two 2-lane frontage roads and construct 4 new non-toll managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Result of METRO's Inner Katy Bus Rapid Transit (BRT) service to accommodate additional travel demand should be recognized before consideration of additional capacity.



I-610 W from I-10 W to I-69 S

Proposed Amendment. Construct 4 express lanes.

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- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Previously canceled due to significant public opposition.

I-10 W Studemont to Houston Ave

Proposed Amendment: Reconstruct to raise the existing 10 mainlanes out of the White Oak Bayou floodway, for reconstructing 2 lane CBD connectors to 4 managed lanes.

- Maintain METRO Inner Katy Bus Rapid Transit (BRT) dedicated access to downtown.
- Removal of structures from the floodway consistent with Resilient Houston goals.

LINK Houston provided detailed comments to TxDOT and METRO in February 2021: Public Comments on Inner Katy Corridor. We are concerned about TxDOT's I-10 Inner Katy Managed Lanes Project, but generally support the agency's I-10 Inner Katy Drainage Improvements Project to better manage flooding. TxDOT is exploring if the state should add four managed lanes to I-10 and/or improve flood mitigation.

In LINK Houston's view, a successful I-10 Inner Katy Managed Lanes Project serves high-occupancy vehicles (or enforces high/variable tolls on all vehicles with only one occupant) and does not in any way impede the quality of the Inner Katy METRO Rapid Bus Rapid Transit (BRT) line and stations. The new BRT line is the additional transportation capacity in the corridor supported by the region's plans. TxDOT had the opportunity to create managed lanes when originally expanding the highway in the 2000's and chose not to do so.

SH 35 from Dixie Drive to Brazoria County Line

Proposed Amendment: Construct new 6 lane freeway with new 2-lane frontage roads.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Significant work funded by the metropolitan planning organization has focused on development of commuter rail in the SH 35 corridor. This does not appear to have been considered or recommended.
 - The H-GAC High-Capacity Transit Framework approved by TPC states, "Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways."
- Limit footprint to within Mykawa Road right-of-way to minimize impacts on residents.





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June 15, 2021

Mr. Craig Raborn, AICP
Director, Transportation Planning
Houston-Galveston Area Council (H-GAC)
3555 Timmons Lane, Suite 120
Houston, Texas 77027

RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan (RTP)

Dear Mr. Raborn:

This letter is in response LINK Houston's April 28, 2021, correspondence regarding comments on the Houston-Galveston Area Council's (H-GAC) 2045 Regional Transportation Plan (RTP) Amendments. The Texas Department of Transportation (TXDOT) will address LINK Houston's comments regarding TXDOT's project development process and then we will address the specific projects identified in the LINK Houston letter.

TXDOT has a long-standing history of providing a robust and equitable transportation system that has served as the State's transportation backbone providing critical access to opportunities and facilitating job creation and economic prosperity. The system is extremely efficient. The State system represents 26 percent of the public roads in Texas and, yet, it carries 72 percent of the vehicle miles traveled.

The Houston region is a microcosm of the State. As the fourth (4) largest City in the nation, Houston and the surrounding region can credit the historical collaboration and cooperation of regional leadership for having had the vision to make the tough decisions and investments needed to bring us to today's regional transportation network. The TXDOT Houston District has not wavered from its commitment to this collaboration and cooperation, but we do not serve one (1) constituency more ardently than any other. Our primary concern is safely moving people and goods in the entire region and beyond.

The TXDOT Houston District strives for excellence on every project and to serve equally the nearly seven (7) million regional residents – from those in the dense, urban core of Harris County to those in rural areas of Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, and Waller Counties. We are especially concerned about those that are most vulnerable.

To accomplish TXDOT's mission, we use some of the most rigorous industry methods to develop our portfolio of projects and to move those projects through project development toward implementation. To that end, the Planning and Environmental Linkage (PEL) Study process, as suggested by LINK Houston, is not the appropriate process to use on most projects. The PEL process is designed to accelerate project delivery by integrating the planning and environmental process with implementation occurring, generally, within five (5) years. While TXDOT is certainly able to perform PEL studies, financial resources cannot keep pace with the potential portfolio of construction projects that would result from the PEL process. In other words, the PEL is not a tool to determine whether a project should be in the RTP, it's a tool for accelerated implementation.

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There are, however, many scientific methods TXDOT uses and studies performed to make decisions about the need for investment and to determine the types of improvements that are required to meet public needs. Our improvements follow industry-standard, federal, and state guidelines for engineering analysis and always consider environmental impacts. Whatever study method is employed, every project goes through the National Environmental Policy Act (NEPA) clearance process and TXDOT's major projects also go through stakeholder engagement and the public involvement process. In general, major projects are those other than routine maintenance, bridge replacements and certain safety improvements.

TXDOT's stakeholder and public engagement process is second to none in the Houston region. No other local government or transportation agency goes through the extensive and rigorous project level public involvement that TXDOT does. In fact, we would recommend as a best practice that other agencies implement our high standard of public engagement. TXDOT's level of engagement is appropriate given the diversity of use and volume of vehicles we accommodate within the region including Single Occupied Vehicles (SOV), carpools, vanpools, busses, and freight haulers. TXDOT is not focused on one (1) mode choice over the other. That is not our mission. TXDOT moves people and goods across a ground transportation system in whatever mode choice the user decides is appropriate.

With that said, TXDOT does want to move people as efficiently as possible across our system, and so we have invested in projects that help users do just that. TXDOT's Houston ConnectSmart Project seeks to level out the Bell Curve of congestion over time, space and ultimately mode in the eight (8) county region. We want to make Houston more connected and less congested. By providing users with information and better travel options such as carpool, vanpool and bus options that are personalized and tailored to the individual and rewarding them for their congestion-relieving decisions, TXDOT believes users are empowered to help us achieve our Visions Zero goal and ultimately will reduce vehicle miles traveled and improve our region's air quality and these choices will be made while riding on some of the safest and most comfortable facilities in the region. Cleaner air and improved safety require a comprehensive approach of engineering and technology solutions to get TXDOT where we want to be with respect to safety and climate. We are committed.

The Regional Express Access Lanes (REAL) concept is a response to the work performed by H-GAC's High Capacity Transit Task Force (HCTTF) in 2019, which developed a recommended network of high capacity transit facilities that largely proposed following the State system. The transit recommendations from this effort included multiple Bus Rapid Transit (BRT), Light Rail, and Commuter Rail lines. The task force's recommendation, developed over seven (7) task force meetings, were subsequently integrated into the 2045 RTP. No full suite of alternatives, qualitative or quantitative process involving data collection and analyses, universe of alternatives, or thorough process for community engagement was performed prior to including these impactful and potentially disrupting technologies into the 2045 RTP, other than the federally required, standard public meeting process for the long-range plan document.

The HCTTF recommendations, and the subsequent inclusion of those recommendations in the 2045 RTP, spurred TxDOT's interest to better understand the impacts of these technologies on the State system. The REAL Plan is a proposed comprehensive and forward-looking plan that seeks to understand how the State system can maximize the movement of people and goods in a highly efficient and agile manner. We are in Phase 1 of The REAL Plan, which includes coming together with our regional transportation partners to make data-driven decisions that are both quantitative and qualitative.

While the State system does support most vehicle miles traveled, the State system does not operate in a vacuum. The Region's ground transportation system functions as a hierarchy. Local streets feed into collectors, collectors feed into arterials and so on leading up to Interstates. A person using this network cannot get from home to their destination without using this integrated transportation network governed by multiple jurisdictions. TxDOT believes a coordinated REAL Plan vision is essential before introducing the concept to the public. To do anything else would compromise the cooperative process between the transportation partners and their respective transportation networks.

Phase 1 of The REAL Plan is the start of a conversation that TxDOT hopes will still be discussed 20 years from now as the REAL Plan goes from concept to phased implementation as needs, resources and new technologies are identified. TxDOT hopes in Phase 2 that H-GAC, with the transportation partners commitment toward a shared vision for the future of transportation in the region, will take The REAL Plan to the next step – the public and ultimately formalize The REAL Plan vision into the region's long-range plan. The TxDOT system is one part of The REAL Plan vision, albeit a critical part since the State's system serves as the transportation backbone moving people and goods in the region.

Further, TxDOT has no preconceived ideas of a REAL Plan network being a series of "interconnected elevated express lanes". Each corridor requires an independent and deeper data-driven analysis that includes the REAL Plan framework and goals collectively agreed upon by the regional transportation partners to ensure an integrated system that provides equitable services from the first mile to the last mile of a person's trip. This independent, corridor level study will collect the specific data and land use information required to determine the needs within that specific corridor. These corridor level studies will include extensive stakeholder engagement and public involvement. That is TxDOT's process.

Some of these major studies being proposed by TxDOT in the 2045 RTP Amendment may be utilizing concepts from the REAL Plan vision that is, admittedly, still in Phase 1. However, each of these corridor studies can function independently, absent a REAL Plan vision because they are being evaluated based on corridor-specific data and needs augmented with public and stakeholder input. The REAL Plan vision does propose an integrated transportation network that is accessed through mobility hubs. Any recommended corridor improvements today should be agile enough to meet a REAL Plan future.

In summary, TxDOT recommends the Transportation Policy Council (TPC) approve the 2045 RTP Amendments as submitted. This will enable us to work cooperatively and collaboratively to plan for the orderly growth and development of the ground transportation system and to foster increased economic vitality and enhanced access to opportunities through more efficient movement of people and goods in the 8-county region.

A final thought before we address the specific projects mentioned in LINK Houston's letter. TXDOT is unwavering in its commitment to provide high-quality, safe, multimodal transportation that is affordable and dignified. Our facilities are not limited to the SOV, any ground transportation mode can access our facilities subject to law. Further, the High Occupancy Vehicle (HOV) lanes incentivize sharing a ride by offering enhanced reliability and managed lanes penalize the SOV by charging a fee for use; although, most are not operated by TXDOT even though they are on the State system. Causing congestion by limiting improvements to the State system to spur behavior change toward higher occupancy commuting and transit ridership is not an acceptable solution. The improvements TXDOT provides are not only for capacity; our improvements increase safety and enhance the driving experience by creating a facility that operates more comfortably for all modes. H-GAC's long-range plan indicates the region's population will swell to nearly 11 million by 2045. It will take all of us working together to provide an integrated and robust ground transportation system that provides users options, so they can decide which mode meets their needs

TXDOT would like to address the specific project concerns outlined in LINK Houston's letter.

Hempstead Road

Hempstead Road from I-610 to BW 8 currently exists in the 2045 RTP. This project will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder engagement and public involvement. As discussed earlier, TXDOT has been inspired by the work of the HCTTF and believes REAL Plan concepts are appropriate to explore in this corridor given its proximity and connection to the proposed high-speed rail project, the Galleria BRT, Northwest Transit Center, and a potential connection to the Inner Katy Corridor and the Central Business District. We look forward to working with all the stakeholders and the public to potentially refine the scope of this important project. All potential scope changes will reflect new technologies and use appropriate, available data.

I-10 West from I-610 West to I-45 and I-10 West from Studemont to Houston Avenue

TXDOT is keenly aware of the time sensitivity of the Inner Katy BRT Project. The BRT Project was the top-ranking project during the 2018 H-GAC Call for Projects and currently is programmed in the H-GAC 2021–2024 Transportation Improvement Program (TIP) to let to construction January 2023. TXDOT will do everything possible to help the Metropolitan Transit Authority of Harris County (METRO) stay on their implementation timeframe.

The I-10 west (Inner Katy) Corridor is a high-volume facility in terms of passenger and freight movement with limited right of way (ROW) for future improvements. This section of roadway carries nearly 275,000 vehicles per day including SOV, carpools, vanpools, and buses. Nearly 8 percent of the corridor's traffic is freight. METRO's Inner Katy BRT Project will impact the State's ROW and the interstate facility.

The identification of existing and future transportation needs for the movement of people and goods within the I-10 Inner Katy Corridor is paramount to ensure TXDOT can adequately respond to METRO's inclusion of the proposed Inner Katy BRT currently programmed for construction in the H-GAC's TIP.

In short, TXDOT must better understand the physical space ramifications and other impacts these proposed improvements will have on the I-10 Inner Katy Corridor. The I-10 Inner Katy Corridor Study is a direct response to the Inner Katy BRT implementation project. Otherwise, TXDOT would be evaluating METRO's Inner Katy BRT project without the necessary information to make sound engineering decisions about the future of the corridor.

To TXDOT's knowledge, the METRO Inner Katy BRT Project does not have enough project level environmental or engineering detail to determine impacts to the human environment, our facility, or the surrounding natural and built environment. Because of the lack of basic project level information on these projects and the certain impact to our facility, TXDOT initiated the I-10 Inner Katy Study so that we could collaboratively develop a shared vision for the future of I-10 Inner Katy.

TXDOT acknowledges that in the days following the federal disaster declaration related to the COVID-19 pandemic, traffic volumes dropped substantially. Traffic volumes remained low in the following months. This is supported by the Regional Travel Impacts of COVID-19 report prepared by the H-GAC and presented at the May 21, 2021, TCP meeting. The report indicates that while traffic volumes initially dropped, the volumes have rebounded and as of "September 4, 2020, the Friday of Labor Day weekend, that travel volumes were equal to or greater than the baseline volume." The report goes on to say that travel volumes have hovered at approximately 80 percent of the pre-COVID volumes.

TXDOT's own data shows that traffic volumes are at or near pre-COVID volumes. The Governor has declared the State open and businesses are returning to normal, we anticipate higher traffic volumes as many individuals may shift from transit to SOV for personal health reasons. In addition, traffic patterns may have changed. For instance, there may be fewer people traveling from home to work during peak periods and more people may be running errands during the day. Nevertheless, the volumes have rebounded, therefore, telecommuting does not seem to have had a significant impact on the State's transportation system. TXDOT does suggest that H-GAC and/or METRO perform a new traffic analysis to reflect the effects of the COVID-19 pandemic and the resultant telecommuting/changes in travel patterns on transit ridership because the traditional morning/evening peak travel demand may have been impacted and thus, may impact current and proposed bus operations. This will ensure that investments being made to develop and implement these very impactful transit services will be using the latest post-pandemic assumptions and data.

TXDOT is committed to supporting the development and implementation of the proposed METRO Inner Katy BRT Project. To date, TXDOT and METRO have worked collaboratively and cooperatively to identify and share information for the benefit of the traveling public. We have successfully delivered a joint Virtual Public Meeting event for the Inner Katy Corridor that showcased the METRO Inner Katy BRT Project while also soliciting input concerning the existing and future transportation needs of the broader corridor. It is the identification of the needs and the discussion of potential solutions for which TXDOT is currently seeking an amendment to the 2045 RTP. Including the Inner Katy Corridor Study in the H-GAC long-range plan is the start of a conversation about the future of this vital corridor. TXDOT would not want the implementation schedule for METRO's Inner Katy Project to be adversely impacted if as requested by METRO, the TXDOT Inner Katy Project is not included in the 2045 RTP. Without inclusion of TXDOT's Inner Katy Project in the RTP, TXDOT will not be able to make sound engineering decisions about the future development of the corridor.

I-610 West from I-10 West to I-69 South

PENDING

SH 35 from Dixie Drive to Brazoria County Line

Improvements to SH 35 from Dixie Drive and continuing south past the Brazoria County (County) line to future SH 99 are needed to provide a critical connection for communities in the southern part of TXDOT Houston District's service area. As stated previously, we do not believe telecommuting to be a large factor in traffic volumes and we do not see where "significant work" has been performed in the corridor to determine that the focus of development for this corridor should be commuter rail. Furthermore, TXDOT would not be the implementing agencies for commuter rail. Commuter rail planning, design, and implementation would be performed by others.

TXDOT's process for corridor studies involves both a quantitative and qualitative process that features extensive stakeholder and public engagement and input before finalizing a proposed improvement concept. We believe including the project in the 2045 RTP establishes meaning by public engagement by communicating TXDOT intends to study the corridor because this corridor is vital to the transportation system for the cities south of Houston. Improvements are anticipated to move people and goods more reliably.

Conclusion

TXDOT is unwavering in its commitment to continually work with regional transportation partners and the nearly 7 million constituents in the Houston-Galveston-Brazoria-Woodlands-Conroe Transportation Management Area to ensure they all have a voice in the State planning process. This continuous cooperation and collaboration are fundamental to achieving the region's mission of improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity.

In addition to this letter, we have provided specific responses to public comments as part of H-GAC's Response Matrix for the 2045 RTP Amendments. Thank you for the opportunity to respond. Should you have any questions please contact my office at (713) 802-5001 or via email at eliza.paul@txdot.gov.

Sincerely,



Eliza C. Paul P.E.
District Engineer
Houston District

Attachment

CC: James W. Koch, P.E., Director, Transportation Planning and Development,
Houston District, TXDOT
Andrew C. Mao, P. E., Director, Advanced Transportation Planning, Houston District, TXDOT
Vishu Lingala, H-GAC
Oni K. Blair, Executive Director, LINK Houston

April 28, 2021

Transportation Policy Council (TPC)
Craig Raborn, Transportation Director
Houston-Galveston Area Council (H-GAC)

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RE: Comments on proposed 2045 Regional Transportation Plan amendments

Dear Mr. Raborn and TPC Members:

We submit these comments in response to the two virtual public meetings held by H-GAC on Thursday, April 8, 2021, to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). People should be able to reach such opportunities in the Houston region safely and with dignity by walking, rolling, biking, and riding transit. These deeply affordable options must be as viable as those afforded by people able to, or choosing to, own and operate personal vehicles. To that end, LINK Houston advocates for a robust and equitable transportation network so that all people can reach opportunity. We strive to be anti-racist and center equity and climate justice in all we do.

Several of the proposed RTP amendments are major highway infrastructure concepts for corridors in Houston through existing residential and commercial development. We have serious concerns about the proposed scope and schedules of these proposed additions to the region's 2045 Regional Transportation Plan. The amendments are not for projects in the distant future. Rather, the amendments requested by the Texas Department of Transportation (TxDOT) propose construction beginning by 2030, within the 10-year Transportation Improvement Program (TIP) program of projects. This gives rise to our primary concern and why we ask TPC to not accept the amendments to the RTP.

TxDOT is premature and acting on outdated concepts. TPC should reject the TxDOT amendments and instead provide leadership by directing the agency to thoroughly implement the federally required process to engage communities and interagency partners to:

- (1) Identify if a project is actually warranted and to identify need and purpose (i.e., following the Planning and Environmental Linkages (PEL) process);
AND THEN IF WARRANTED...**
- (2) Explore a full suite of project alternatives through interagency cooperative planning and in concert with directly adjacent communities (i.e., develop alternatives that satisfy the "critical links between transportation needs and other societal goals").**

The Federal Highway Administration (FHWA) *Transportation Planning Process Briefing Book* states the following in the introduction,

"The performance of the transportation system also affects public policy concerns, such as safety, air quality, environmental resource consumption, social equity, resilience, land use, urban growth, economic development, and security. Transportation planning recognizes the critical links between transportation needs and other societal goals." [emphasis added]

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments will bypass the Planning and Environmental Linkages process



which is intended by Congress and FHWA to accelerate project delivery with early cooperative and comprehensive planning. According to the FHWA webpage,

"Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that 1) considers environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analysis, and products developed during planning to inform the environmental review process."

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LINK Houston believes thorough community engagement to develop qualitative data and thorough quantitative analysis of transportation demand, travel patterns, and environmental impacts are both warranted given travel preference trends and technologies, recent telework experience, and technological advances changing how and when people and goods move. Data from these analyses will impact the need and purpose for each project. The PEL process, quantitative data analysis, and qualitative data from engagement must be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated.

The proposed amendments are for transportation projects inseparably connected with other goals and plans. The City of Houston Climate Action Plan, Resilient Houston, Vision Zero Strategy, the METRONext Moving Forward Plan, and other local plans are all more recent than the outdated thinking behind TxDOT's requested amendments. Houston and the region deserve better. We can do better. Our residents and businesses need us to be better. **One way to stretch and be better is for TPC to require project sponsors to incorporate locally supported goals and plans into the purpose and need for corresponding projects.** For example, projects within the City of Houston must incorporate goals from the Climate Action Plan, such as to "Reduce Vehicle Miles Travelled per capita 20% by 2050."

LINK Houston suggests TPC instruct H-GAC staff to conduct a study, including extensive public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP. The combined Inner Katy Managed Lanes, I-610 W Managed Lanes, and Hempstead Highway Managed Lanes proposed as amendments to the 2045 RTP with 2026-2030 construction dates seem to indicate an intent to construct core elements of a regional express access lane concept. Initiation of federal environmental review for the Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead Managed Lanes seems premature given that a network of interconnected elevated express lanes remains a planning-level concept. The vision of a regional elevated express lane network has not been vetted with the public, reviewed, or approved by the H-GAC Transportation Policy Council, nor contemplated in the 2045 Regional Transportation Plan adopted by the agency responsible for regional transportation planning less than two years ago in May 2019.

The benefits and burdens of transportation policies and systems should be equitably allocated across communities so we collectively address past harm and neglect to ensure that all people can reach opportunities in the future. The 2045 RTP states that,

"H-GAC's mission is to plan for the orderly growth and development of the region, working in concert with multiple planning partners. This mission involves building region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity."



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The public expects H-GAC to fulfill its mission. Likewise, the public expects TPC to provide leadership built upon the foundation of sound thinking and fair representation – with deep mutual respect for members representing the locations where projects occur.

Thank you for the opportunity to provide comments on the proposed amendments to the 2045 RTP.

Sincerely,



Oni K. Blair
Executive Director
LINK Houston

P.S. Below are project-specific comments on proposed RTP amendments. We make these additional comments in full support of the City of Houston's, residents', and business owners' posted comments.

Hempstead Highway/Road

Proposed Amendment: Reconstruct Hempstead Road and add one transit lane in each direction at grade and construct 4 elevated managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Elevated lanes have not been coordinated.
- Significant work funded by H-GAC has focused on development of commuter rail in the Hempstead corridor. This does not appear to have been considered or recommended.
 - The H-GAC High-Capacity Transit Framework approved by TPC states, "Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways."

I-10 W from I-610 W to I-45 N

Proposed Amendment: Reconstruct 10 mainlanes and two 2-lane frontage roads and construct 4 new non-toll managed lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Result of METRO's Inner Katy Bus Rapid Transit (BRT) service to accommodate additional travel demand should be recognized before consideration of additional capacity.



I-610 W from I-10 W to I-69 S

Proposed Amendment: Construct 4 express lanes.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Previously canceled due to significant public opposition.

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I-10 W Studemont to Houston Ave

Proposed Amendment: Reconstruct to raise the existing 10 mainlanes out of the White Oak Bayou floodway, for reconstructing 2 lane CBD connectors to 4 managed lanes.

- Maintain METRO Inner Katy Bus Rapid Transit (BRT) dedicated access to downtown.
- Removal of structures from the floodway consistent with Resilient Houston goals.

LINK Houston provided detailed comments to TxDOT and METRO in February 2021: [Public Comments on Inner Katy Corridor](#). We are concerned about TxDOT's I-10 Inner Katy Managed Lanes Project, but generally support the agency's I-10 Inner Katy Drainage Improvements Project to better manage flooding. TxDOT is exploring if the state should add four managed lanes to I-10 and/or improve flood mitigation.

In LINK Houston's view, a successful I-10 Inner Katy Managed Lanes Project serves high-occupancy vehicles (or enforces high/variable tolls on all vehicles with only one occupant) and does not in any way impede the quality of the Inner Katy METRO Rapid Bus Rapid Transit (BRT) line and stations. The new BRT line is the additional transportation capacity in the corridor supported by the region's plans. TxDOT had the opportunity to create managed lanes when originally expanding the highway in the 2000's and chose not to do so.

SH 35 from Dixie Drive to Brazoria County Line

Proposed Amendment: Construct new 6 lane freeway with new 2-lane frontage roads.

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Significant work funded by the metropolitan planning organization has focused on development of commuter rail in the SH 35 corridor. This does not appear to have been considered or recommended.
 - The H-GAC High-Capacity Transit Framework approved by TPC states, "Every investment in transportation that is made by the Transportation Policy Council should be viewed as an opportunity to advance HCT concepts, either in support of transit priority on freeways and thoroughfares, or new transit services along freeways and tollways."
- Limit footprint to within Mykawa Road right-of-way to minimize impacts on residents.



Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Fred Foreman

Organization

N/A

Submission Method

Email (First Round)

Date Comment Submitted

01/07/2021

Comment

As a bicyclist I feel that every road in Harris county should have a sidewalk so I don't have to constantly risk being squashed by an aggressive driver feeling he owns my portion of the road.

I see way too much emphasis on automotive traffic in the 2045 RTP. We must consider more bus and train alternatives.

That also includes educating the public on these available alternatives. When I go to jury duty by Park & Ride from Cypress the other jurors are always amazed that there is another method of transportation available. They either did not think of it or were not familiar with Park & Ride.

I also find it difficult to use an HOV or Park & Ride which I'm not familiar with since the signage and information available about HOV lanes and Park & Ride is hard to find or non-existent AND I'M A PARK & RIDE USER!

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP. The 2045 RTP includes more focused plans such as Congestion Mitigation Air Quality (CMAQ) Plan, Regional Safety Plan and Congestion Management Process to address the congestion, air quality and safety concerns in our region. For more details please see appendices to the 2045RTP at <http://www.2045rtp.com/documents.aspx>.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Tom Schmal

Organization

N/A

Submission Method

Email (First Round)

Date Comment Submitted

01/07/2021

Comment

Fellow Houstonians

TxDot grossly overstates the benefits of its NHHIP project. It uses as a base "Do Nothing" case, traffic patterns from a 20 year old H-GAC report designed to support Metro. Back then the Hardy was a ghost road, contributing little to solving congestion. Now finally under construction, the Hardy Downtown Connector project will actually make a huge contribution - carrying two lanes of traffic both ways - a contribution wrongfully claimed by TxDOT.

For example, the FEIS claims that the trip from Crosstimbers to the convention center now takes up to 77 minutes and after NHHIP it will take only 19 minutes. Quite ignored is that the 19 minute trip will actually be possible on the Hardy, long before NHHIP is completed.

It also predicts that congestion on 610 Loop east of I-45, which now slows to 12 mph, will improve to over 50 mph. Well, of course it's slow now. Every commuter on the Hardy has to exit on 610 to get downtown and back. Fortunately, long before NHHIP is finished those commuters and thousands of others from north I-45 will be flying over 610 and the 12 mph problem will have been solved, solved once again by the Hardy Connector, not the I-45 expansion.

In thousands of pages TxDot has not credibly estimated the most important part of its project, the congestion benefit. It does not recognize that the Hardy connector, which is not even in the NHHIP budget, will bring just as many lanes and just as much peak traffic downtown as the I-45 expansion will. To make its own project look good, TxDot claims all that benefit for itself.

This is not how the project should be evaluated. NHHIP should not proceed until after the Hardy Connector is finished. Only then can we get a credible projection of its true incremental benefit potential and make a good decision about proceeding.

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response:

The Hardy Toll Road (HTR) Extension will only function to it's full potential as a reliever route for the NHHIP. The HCTRA HTR design without NHHIP has the two lanes each direction merging to one lane at I-10/I-69 as it has to tie into the existing I-10 to I-69 connector ramps. This will result in a mixing of traffic between users desiring to get to/from the Hardy Toll Road with users desiring to access I-10 and I-69. The NHHIP plan reconfigures the HTR Extension so that it no longer connects to a freeway to freeway connection, but instead the HTR will have a dedicated connection that gives users the option to connect to downtown or stay on the freeway. This option is ONLY possible through NHHIP.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Michael Huffmaster

Organization

N/A

Submission Method

Email (Late Submission)

Date Comment Submitted

04/29/2021

Comment

Request criteria for evaluation of 36 a route Alternatives. To date no response has been received

Please remove TxDot alternative request illustrative route. It is suggesting a preferred route and intrudes on conserved landed, valuable to wildlife, waterfowl and wintering sandhill cranes

Unless you are crazy or stupid, provide at least a 1 mile buffer from 36a and KPC/conserved lands.

I'd this is needed at all all, a ring by road west of 99? Use 99 and improve as required.

Response

Thank you for your comment. Please see response from TxDOT below.

TxDOT response: While the specific evaluation criteria have not yet been established for the 36A study, these are the general steps and considerations in a feasibility study:

- * Assess the need for the project

- * Conduct feasibility analysis of the alternatives

- * Analyze the impact of the project on the:

- transportation system - changes in travel time, safety, and vehicle operating cost

- social and economic effects - impacts to the community including the human environment, civil rights, and environmental justice, economic impacts/development, etc.

- natural systems - including air/water quality, endangered species, wildlife, greenhouse gasses, archeological, energy, and cultural and historically significant locations and structures.

While much more goes into the process, our ultimate goal of the study is to describe the potential outcomes of a given alternative so that our regional leadership can make an informed investment decision for the benefit of the region to move people and goods.

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Ramona Neal

Organization

Highway 36 A Coalition

Submission Method

Email (Late Submission)

Date Comment Submitted

04/29/2021

Comment

Resolution sent as an email attachment

[View Attachment](#)

Response

Thank you for your input. We will take those comment into our consideration for the 2045 RTP Amendments process. Please see the response from TxDOT below.

TxDOT response: At the request of local Fort Bend and Waller Counties leadership, the 36A projects (north and south) are in the planning stage of project development. TxDOT has not identified potential routes or the associated evaluation criteria. The 36A South segment area is experiencing high growth with increasing traffic demands and safety needs. Although less developed than the southern segment, the 36A North segment region is experiencing significant growth and development including retail/commercial and residential developments in the area and is anticipated to need an additional north/south connection to move people and goods. North/south freight movement and system connectivity between these areas is important. Including these projects in the 2045 RTP is the first step to notify the public of our intention to study this proposed corridor. Inclusion in the 2045 RTP is the start of a conversation regarding the potential for a 36A corridor that will include extensive public and stakeholder engagement and input as we consider alternative alignments for this potential project.



Incorporated May 2008
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PO Box 1082 Weston Lakes, Texas 77441
8045 FM 359, Fulshear, Texas 77441
(281) 533-0907

Resolution 05-21

Resolution in Support of the Amendment to the HGAC 2045 Regional Transportation Plan 27 April 2021



WHEREAS, the Highway 36A Coalition is an advocate for the development of regional transportation infrastructure from the Brazosport area to Hempstead and beyond.

WHEREAS, the 36A route proposed as an amendment to the 2045 Regional Transportation Plan will provide an efficient and expanded transportation and freight route from Port Freeport to US 290. It involves a route from the Rosenberg\Needville\I69 area in Fort Bend County to Interstate 10 (36A Southern Route) and a continuing piece from Interstate 10 to US 290 (36A Northern Route) in Waller County.

WHEREAS, these routes are necessary for enhanced evacuation capacity given State Highway 36 is a primary evacuation route for Southern Brazoria County and for efficient freight movement as a means of current and future need identified by H-GAC in their freight mobility efforts to route traffic outside the metropolitan core. With the groundbreaking of Port Freeport Harbor Channel Improvement Project, ensuring that Port Freeport will be the deepest Port on the Gulf Coast and throughout the region, we need to have foresight to ensure transportation mobility is there as the Port grows, among other benefits delivered by the two projects.

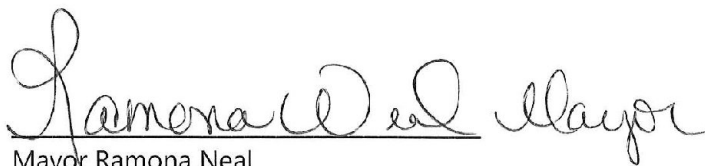
WHEREAS, the Highway 36A Coalition is a 501(c)4 nonprofit consisting of local governments, elected officials, private businesses, and individuals working together to

advocate for the responsible development of a regional transportation corridor connecting Port Freeport and the Brazosport area to north Texas and beyond without adding to the congestion in the Houston metropolitan area. Our mission includes improving hurricane evacuation, efficient mobility, and economic development for the region and the state.

WHEREAS, the 2045 Regional Transportation Plan is hugely important to the future planning of regional mobility, congestion mitigation, quality of life, safety, and efficient movement of goods. We appreciate the effort. TxDOT is currently underway with a 2 to 4 lane expansion from Port Freeport to Rosenberg. This route needs to continue in an efficient path to Interstate 10 and to US 290 to provide maximum benefit of evacuation safety and efficient freight mobility movement.

WHEREAS, H-GAC knows well that planning is the key to ensuring the most effective routes at the most reasonable costs to achieve their goals. Doing so before development occurs expands options and reduces cost. For this reason, we have particular concern that the Southern Route be incorporated this year at minimum. The pace of development in Fort Bend County poses great risk to the future location of such a route and threatens to increase cost, should they not be undertaken now. 36A Southern Route provides the key connection from Port Freeport and Brazoria County to Interstate 10 and provides enhanced evacuation, safety, freight mobility and commerce throughout the region.

NOW, THEREFORE, BE IT RESOLVED that the City of Weston Lakes City Council is in agreement with the approval for the amendment to add 36A to the 2045 Regional Transportation Plan.



Mayor Ramona Neal
Board Member of Highway 36A Coalition



Jenni McJunkin, City Secretary
Attesting Signature

Regional Transportation Plan and Air Quality Conformity Submitted Public Comment

Name

Antonia Dacus

Organization

N/A

Submission Method

Email (Late Submission)

Date Comment Submitted

04/29/2021

Comment

1. We need sidewalks all over town. It is not safe to walk anywhere, especially on East Houston Street.
2. The Brazos bus needs to run later and have more stops. My disabled daughter works at Whataburger until evening time. There is no way for her to safely get home because no transportation is available.
3. We need a taxi service available for everyone.

Response

Thank you for your interest in the 2045 RTP. H-GAC appreciates you taking the time to express your concerns. These comments will be considered for the 2050 RTP.

