

TPC March 25, 2022 Public Comments

Date: March 24, 2022

To: Mr. David Robinson, Transportation Policy Council Chairman

CC: Houston-Galveston Area Council Transportation Policy Council Members

From: Air Alliance Houston, BikeHouston, LINK Houston, and StopTxDOT I-45

Regarding: Environmental sustainability, economic, and safety recommendations

Dear Chair Robinson,

Congratulations on being voted Chair of the Houston-Galveston Area Council's (H-GAC) Transportation Policy Council (TPC) for 2022. As you are keenly aware, our region faces a number of challenges relating to and intersected with transportation: environmental sustainability, public health and safety, and economic viability. TPC policy and leadership impacts each area of concern and opportunity. Our organizations believe the TPC can effectively address these challenges under your leadership. In combination with the momentous federal infrastructure legislation, we are approaching an important opportunity to develop and realize an exciting vision for the future of transportation in our region.

Each of our organizations shares a common interest in advocating for a sustainable, equitable transportation system focused on improving public safety, accessibility, and access to opportunity. Such a comprehensive system will require a commitment to diligently expand multimodal and active transportation infrastructure in our region. We offer the following four persistent issue areas for your, and TPC's, consideration. Each of the four topics lies within existing H-GAC policy and practice. Our organizations work on these issues extensively and are providing recommendations we believe will improve transportation outcomes for the region. As Chair, it is within your power to set the agenda for each TPC meeting; we encourage you to employ this power responsibly and with a commitment to achieving these goals.

SAFETY AND VISION ZERO

In September 2020, H-GAC took a bold step becoming the first Texas MPO to establish a Vision Zero goal to eliminate traffic fatalities by 2050. But since then, Texas traffic fatality rates have climbed, not fallen, and today's road fatalities are at a 10-year high. This is true for all modes, most alarmingly for bicyclists and pedestrians—the transportation system's most vulnerable users.

At recent TPC (1/28/2022) and TAC (2/16/2022) meetings, transportation safety performance measures and targets were presented by H-GAC staff. The 2022 targets presented—calculated based on a 5-year average—are underwhelming and give no confidence that Vision Zero is being meaningfully pursued by the MPO. This is troubling because Vision Zero programs and associated efforts such as speed reduction infrastructure treatments, traffic calming methods, and attention to high injury network locations, are fundamental to building a safe

transportation network for the region. We ask H-GAC to take sincere steps, including setting ambitious safety goals, towards achieving the resolution goal of eliminating fatalities by 2050.

To address this, we recommend:

- **Staff the open safety planner position**—the position that will be responsible for Vision Zero-- with an individual who has the authority to set meaningful annual targets and whose work is guided by the Vision Zero resolution, that: “The region’s loss of life is unacceptable;” “The elimination of traffic fatalities is achievable;” and that “The safety of *all roadway users* is the most important consideration in transportation planning and engineering.” We recommend the position to be at the Principal or Program Manager level reporting directly to the Director of Transportation.
- **H-GAC to take a serious safety position during the 88th Texas legislative session** by advocating for the reinstatement of red-light cameras and allowing municipalities to set local prima facie speed limits under 30 miles-per-hour.
- **Coordinate and lead regional municipal partners.** The MPO should develop and share a comprehensive dataset with the region’s municipalities so that all regional cities and counties have a consistent record of street characteristics and conditions where crashes, injuries, and fatalities occur.
- **Appoint additional members to the newly created Safety Task Force** who personally, and organizationally, move about our region by walking, biking, rolling, and riding transit (i.e., staff at BikeHouston, LINK Houston, or other similar organizations).

AIR QUALITY

There are two air quality standards of interest for the Houston-Galveston-Brazoria (HGB) region—the Texas Commission on Environmental Quality’s (TCEQ) Motor Vehicle Emission Budgets (MVEB) for nitrogen oxides (NOx) and volatile organic compounds (VOCs) and the Environmental Protection Agency’s (EPA) National Ambient Air Quality Standards (NAAQS) Ozone standard. The first standard, MVEB, is used for the conformity assessment (required for the approval of the Regional Transportation Plan) and the second standard, NAAQS, is the federal standard that determines a region’s ozone status and funding provided by the Congestion Mitigation and Air Quality (CMAQ) program.

There is a stark disconnect between the two standards and results. The region consistently attains the MVEB standard to achieve conformity but is designated in serious ozone nonattainment for the NAAQS. Another important difference between the two standards is that results from the MVEB are theoretical and model-derived whereas results from the NAAQS are based on actual ozone readings from dozens of TCEQ air quality monitoring stations. While both standards are supposedly measuring the same air quality content, they arrive at entirely different conclusions. Furthermore, the two measures are completely decoupled - our region’s consistent failure to meet NAAQS standards has no bearing on MVEB budgets or strategies employed to improve air quality.

This disconnect demonstrates that the MVEB results are divorced from reality. In practice, this results in the air quality monitoring and policy apparatus within the H-GAC carrying out performative box-checking and little else. The air quality ‘improvements’ measured and approved by H-GAC via conformity have no basis in reality and, as our NAAQS status shows, are likely *worsening* air quality.

The MVEB model should be revised to align more closely with the federal NAAQS standards. Failure to reach attainment should affect our region’s conformity process and result in more stringent strategies to improve air quality.

To address this, we recommend:

- **H-GAC staff work with** TCEQ (responsible for MVEB), TTI (develops portions of MVEB model), and other state MPOs to revise the MVEB process;
- **Give less credence to the conformity results** by publicly discussing the shortcomings and broad assumptions of the modeling process, especially within planning purposes and when sharing information with the public. In recent years, H-GAC leadership has glossed over NAAQS attainment information and has chosen to communicate conformity results to the public instead. Sharing MVEB results instead of NAAQS results obfuscates the region’s air quality status.
- **Default to make planning decisions based on the NAAQS standard**, not the MVEB standard, until alignment between the two standards occurs. Furthermore, any new required air quality performance measures must be aligned with NAAQS and needs to be grounded in reality - measurements taken over multiple years and averaged out do not reflect current conditions and is a poor measure of air quality.

GREENHOUSE GAS EMISSIONS

Currently, the Regional Transportation Plan (RTP) includes no mention of Greenhouse Gasses (GHGs), despite the fact that the transportation sector is one of the largest emitters of GHGs, and that the Houston-Galveston MPO region is especially vulnerable to climate crises, including extreme weather events like hurricanes and hard freezes.

The Federal Highway Administration Memorandum “Policy on Using Bipartisan Infrastructure Law Resources to Build a Better America” issued on December 16, 2021, states that transportation investments and projects will be prioritized if they “address environmental impacts ranging from stormwater runoff to greenhouse gas emissions...[and] prioritize infrastructure that is less vulnerable and more resilient to a changing climate”. Even though GHGs are not yet federally regulated, the Bipartisan Infrastructure Law (BIL) serves as the country’s new surface transportation bill and we strongly encourage the H-GAC to follow recommended guidance to ensure the region can fully utilize federal funding. Moreover, addressing climate and GHG emissions is consistent with the Bipartisan Infrastructure Law and recently issued Presidential Executive Orders (EOs), including, EO 14008, Tackling the Climate Crisis at Home and Abroad (86 FR 7619); EO 13985, Advancing Racial Equity and Support for

Underserved Communities Through the Federal Government (86 FR 7009); and EO 14030 Climate Related Financial Risk (86 FR 27967).

Finally, the City of Houston's Climate Action Plan explicitly calls for a substantial reduction in Vehicle Miles Traveled (VMT) per capita in order to reach the goal of carbon neutrality. Many of the policy levers essential to meeting this goal, such as federal funding allocation and regional project selection and criteria, fall within the jurisdiction of the H-GAC and TPC.

To address this, we recommend:

- **Amend the 2045 Regional Transportation Plan** to include GHG reduction, climate action, and climate resiliency as regional goals.
- **Develop programs, goals, and strategies for reducing transportation-sector related GHG emissions**, as done by the North Central Texas Council of Governments (NCTCOG) Mobility 2045 Plan, Chapter 4 and Appendix C.
- **Begin tracking regional GHG emissions**, such as by beginning to model potential GHG emissions and/or VMT impacts from future regional projects. H-GAC staff has indicated they have the capacity to execute each of these actions.
- **Revisit the H-GAC's Environmental Justice report** by integrating its recommendations into various plans and policy processes. The EJ Report identifies persistent issues with inequitable funding distribution and alarmingly disproportionate representation on the TPC; addressing these issues must be a TPC priority.
- **Discourage the use of congestion/Level of Service (LOS) as primary metrics** in short- and long-range planning processes. As a policy impetus, encourage a transition towards assessing accessibility for volumes of people instead of mobility for vehicles.

REGIONAL PLANNING

H-GAC transportation decisions are made based on the assumption that the Houston region will continue to experience large growth in population, jobs, and travel volumes throughout the upcoming decades, with much of the growth following an outward growth pattern characterized by suburban sprawl. This assumption is problematic because the projections are made using overly simplistic modeling methodology. Overwhelmingly, H-GAC demographic and travel demand models are based on historical data and trends that do not account for actual and likely disruptions or alternate scenarios. By limiting the models' inputs and parameters to historical data and trends, the results are skewed towards a business as usual development paradigm, which for the Houston-Galveston region is one of outward growth. However, a number of important factors, including the economy, flooding, and local policies are already changing the region's development pattern thereby challenging the models' results.

Furthermore, the various H-GAC bodies that use this data treat it as if it's divorced from policy. Rarely does the TPC discuss the actuality that major policy decisions can and do have an impact

on these growth projections. Instead, the data is held as an immutable fixture that all policy decisions must align with.

To address this, we recommend:

- **Establish a forum to review modeling best practices for H-GAC's** demographic and travel demand model (TDM) methodology, including induced demand into TDM models, for example.
- **Make modeling methodologies** and datasets publicly available for review. Based on a review of the H-GAC website, modeling methodology information is not accessible and is not included in any part of the RTP documentation.

As you're likely aware, many of these recommendations align with City of Houston, H-GAC, and Texas state agency planning documents. We believe this alignment is both an impetus for implementing these recommendations as well as a strong opening argument for cooperation among the interests represented at TPC. The City, Harris County, H-GAC, and TxDOT each have adopted Vision Zero or similar goals around improving transportation safety.

These recommendations also align with the goals laid out in the Climate Action and Resilient Houston Plans, both of which you've championed in the past. While the H-GAC has not adopted specific climate initiatives as of yet, USDOT has indicated that MPOs should integrate climate sustainability into long range planning. Guidance to be issued later this year on using newly available IIJA funds will reinforce these recommendations. Furthermore, the 2045 RTP highlights regional resiliency as an overall goal, and the TPC, as good stewards of the region, must lead the region's climate change mitigation efforts.

Finally, we'd like to recognize the good work and incredible effort put into regional plans such as the High Capacity Transit Task Force, the Active Transportation Plan, and the Resiliency and Durability Report. We believe these planning documents reflect a positive vision for the future of transportation in our region and encourage the TPC to work to fully realize these plans.

Regards,

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