

APPENDIX H

PUBLIC COMMENTS

**Public Meeting to Receive Comments on the
Draft 2002-2004 Transportation Improvement Program (TIP)
Thursday, May 3, 2001 - 5:30 p.m.
3555 Timmons Lane 2nd Floor Conference Room A**

On Thursday, May 3, 2001 the Houston-Galveston Area Council (H-GAC) will host a public meeting at the H-GAC offices to receive comments from the public on the Draft 2002-2004 Transportation Improvement Program (TIP). The Draft 2002-2004 TIP identifies priority roadway, transit and air quality related projects scheduled for implementation between September 1, 2001 and August 31, 2004. A copy of the Draft 2002-2004 TIP is available for review in the H-GAC library at 3555 Timmons Lane, Suite 500, from 7:30 a.m. to 4:30 p.m. (Monday through Friday).

For questions and comments on the Draft 2002-2004 TIP, please contact Mr. Rick Beverlin, Sr. Transportation Planner at (713) 627-3200 or via e-mail at rick.beverlin@hgac.tx.us. Comments may also be faxed to (713) 993-4508. All comments should be received by H-GAC no later than 5:00 p.m. on May 11, 2001.

In compliance with Americans with Disabilities Act, H-GAC will provide for reasonable accommodations for persons attending H-GAC functions. Requests should be received by H-GAC 24 hours prior to the function.

SIERRA CLUB



Houston Regional Group
P.O. Box 3021
Houston, Texas 77253-3021
713/895-9309

May 3, 2001

Mr. Rick Beverlin
Senior Transportation Planner
Houston-Galveston Area Council
P. O. Box 22777
3555 Timmons
Houston, Texas 77227-2777

Dear Rick,

Enclosed are the comments of the Houston Sierra Club regarding the Draft 2002-2004 Transportation Improvement Program (TIP), April 20, 2001.

Chapter 1 - Introduction

The TIP and MTP still does not recognize or even mention the I-69 project that is slated for the Houston Area. This is a significant project that will cause air quality impacts, noise impacts, safety impacts, habitat loss impacts, water quality impacts, flooding impacts, and cumulative land use development impacts. The I-69 proposal has several alternatives following the Grand Parkway (GP), either north or south, from I-59. This is a deficiency in the MTP/TIP that must be resolved.

On page 1-2, TIP Scope, states that the TIP demonstrates, "environmental, air quality, cost, and mobility considerations are addressed in regional transportation planning and local programming." However, the goals for these factors are not listed or the criteria used to make such determinations. All HGAC states is that environmental documentation for individual projects will be conducted where it is thought that it is necessary.

We are very concerned that the consensus of the community is not to put freeways through parks. Yet HGAC supports the Texas Department of Transportation's (TxDOT) proposal to put a freeway through Hermann Brown Park. Perhaps that might have been the community standard 25 years ago but it is not now. Why is HGAC not working with the TxDOT to find an alternative to destroying Hermann Brown Park? This is especially feasible since additional ROW is available to put the freeway outside the park. What are HGAC's community standards for protecting parks and not running freeways through them?

On page 1-9, under "Transportation Equity Act for the 21st Century (TEA-21)" one of the seven broad areas to be considered in the planning process is, "Protect and enhance the environment, promote energy conservation, and improve quality of life." We do not see where destroying a city park by putting a freeway in the middle of the park is protecting and enhancing the environment. We also see nothing in this document that shows that long-term environmental effects a freeway added capacity, starting from construction to when the added freeway capacity is filled. We do not see where there is any energy conservation involved or energy saved (long-term). We also do not see where this TIP/MTP is improving the quality of life. HGAC has not documented or provided the factual information that shows that quality of life in all its facets or even most of them will be improved by adding more freeways and lanes miles while allowing additional lands to be gobbled up by sprawl.

We refer HGAC to our comments on 03/13/2001 (copy enclosed) about the "Draft Conformity Re-Determination for the 2022 MTP and the 200-2002 TIP." In our comments we list 27 documents that we submitted to HGAC at that time and at previous times. We are referencing these documents as part of our comments and are not resubmitting them since HGAC already has copies.

"When we try to pick out anything by itself, we find it hitched to everything else in the universe." *John Muir*

We are submitting copies of our comments from 02/23/2001 to the U. S. EPA, from 02/08/2001 to the U. S. EPA, from 08/30/2000 to the HGAC, from undated to the HGAC, and from 03/06/2000 to the HGAC, documenting the deficiencies in the MT/TIP. Because of these deficiencies this most recent TIP and the MTP upon which it is based are not legally complete. We request HGAC withdraw both documents and make them legally complete and re-release them for public review and comment.

On pages 1-6 & 1-8, allowing project cost overruns of 25% is financially irresponsible. We object to the allowance for such large cost overruns. If projects are going to cost one-fourth more than their original price there should be an audit and public review and comment on whether such a project is worth the cost. This information should also be documented in a supplemental environmental impact statement.

On page 1-15, HGAC calls Transportation Control Measures "relatively low cost solutions to congestion problems." This is not necessarily so since High Occupancy Vehicle (HOV) are very expensive.

On page 1-16, we object to the way congestion mitigation analysis is conducted. The criteria set up are so biased that three of four levels of congestion require added capacity. The way that HGAC has set-up these criteria there is little or no way that TCMs can possibly reduce congestion to the level the criteria requires. The fact that congestion occurs again and again within 5 years of opening new capacity on existing freeways demonstrates that whatever is done is short lived. HGAC has not educated the public that no matter what is done, as long as a vehicle miles traveled, increase faster than population/jobs, that congestion will remain a fact of life. What level of congestion will the public have in its life regardless of this proposal?

Chapter 2 – Federally Funded Highway Projects

Where is I-69 in the TIP/MTP. What funds will be expended on planning for this project for the next three years?

We are opposed to the following projects:

3510-10-003, Segment I-2 of SH 99 (Grand Parkway) from south of FM 565 to FM 1405
0271-17-135, IH610 southbound main lanes from south of Woodway to north of IH-10 West
0271-17-136, IH610 northbound main lanes from south of Woodway to north of IH-10 West
3510-05-008, grade separation for SH 99 at Bay Hill-Highland Knolls
3510-10-002, Segment I-2, SH 99, IH-10 East to south of FM 565
0028-02-055, US 90 from south of Oates Road to north of Mercury
1400-03-006, FM 1774 from Grimes County Line to Montgomery County Line

We are concerned that a number of projects are listed with indeterminate locations or explanations for their use. For instance 0912-00-994 is for TxDOT CTMS projects, 0912-00-995 for Transtar projects, for 0912-34-096 for Missouri City Bike/Pedestrian Projects, for 0912-00-993 for ATMS projects, 0912-00-051, install highway advisory radio, for 0912-00-956 clean air action transit program, 0912-00-970 for alternative fuel program all have no locations specified and the need for these projects. How is the public going to be able to review and comment responsibly on such projects when basic information is not provided?

Concerning surface transportation program (STP) candidate projects we are concerned about several projects. The Katy Freeway widening projects need to be assessed further. This expansion will cover 35 miles and will result in the shutdown or relocation of 871 businesses, 72 residential units, 122 multi-family units, and 2 non-profit organizations. This is a major impact and is significant along with the additional flood problems, noise, air pollution, and park takings that will occur. Page 38 of the Katy Freeway DEIS states that no alternative had a fatal flow including fitting the proposed I-10 expansions through the existing IH-610 interchange. Yet project 6040 for STP states that interchange ramps will be reconstructed. This appears to be a case of a modification of the interchange due to the I-10 widening. Either that or the widening is being segmented as part of another project so it will not show up as being an impact of the I-10 widening. We object!

For Congestion Mitigation candidate projects we do not currently favor the grant (project 9389, for \$650,000) proposal for HGAC to conduct clean air action public outreach. HGAC has not provided an explanation of the elements of this plan, what has been done with past grants, and how effective they have been. The public is not being informed about the proposal with meaningful information so it can review and comment on it responsibly.

In the document entitled "Draft 2002-2004 TIP Approval to receive Public Comments on draft project listings, TPC Agenda Item 7, Mailout 04/10/2001," under "Results of the April 10, 2001 Meeting of the TIP Subcommittee," HGAC states, "(b) Bicycle/Pedestrian – In this category, project readiness information was insufficient for the majority of projects. More importantly project sponsors did not demonstrate much enthusiasm for the pursuit of CMAQ funds for bike/pedestrian projects in the 2002-2004 timeframe." It concerns us that HGAC is allowing this action. This is the perfect opportunity for HGAC to apply, along with other member cities and counties in the Council of Governments, pressure to get back on track for non-polluting bicycle facilities. There is no discussion of this problem and no indication HGAC will do anything to alleviate this situation. It appears that HGAC is abandoning bicycles as a non-polluting TCM alternative.

Chapter 5 – Locally Funded Regionally Significant Projects

We are opposed to the following projects:

451, Hardy Toll Road from IH-610 to Houston Central Business District
985, Westpark Toll Road from SH 6 to IH-610.

Appendix A – Methodology for Selection of STP and CMAQ Projects

Under "C. Assess short-range and long-range needs for roadway expansion" what are the "other benefits mentioned?" "Other criteria" that should be used include what the impacts of the project are when full capacity is reached and how soon full capacity will be reached.

Under "Decision Rules for Evaluating Roadway Projects, 1. Congestion" linking roads together on the outer limits of Houston will have the effect of increasing sprawl by making it easier to get to outlying areas. Project evaluation and prioritization includes almost no consideration of environmental factors. The assumption is that these will be covered in individual projects (Project Readiness for the TIP, Environmental Analyses). This ignores the cumulative impacts that are occurring due to the implementation of the TIP/MTP as a whole. By not looking at the cumulative impacts (like induced secondary development) HGAC cannot make any reasoned assessment on the impact that the TIP/MTP will have on the quality of life and environment of the area.

2002-2004 TIP Appendix B Conformity Analysis Executive Summary

The TIP is illegal because the most recent approved mobile source budget has not been used in this conformity analysis. Instead of using 195 TPD or even 151.5 TPD HGAC is using the discredited 283 TPD of NOx. If the TIP is truly a part of the MTP then it is not in sync with the "MTP Air Quality Conformity Re-Determination: 2022 TTP and 2002 TIP" which uses a 195 TPD mobile source emissions budget. We object to this gerrymandering of emissions budgets to allow projects to be approved before the final mobile source emissions budget is approved. We request that HGAC discontinue this TIP/MTP effort until a final budget has been determined for mobile sources.

We are extremely concerned that HGAC does not have Appendix D, Projects Undergoing Environmental Assessment, finalized in the April 20, 2001 Draft 2002-2004 TIP. The public has a right to know this information and to review and comment on it at the public meeting.

Appendix C – CMAQ Projects

We oppose the following projects:

1998-0118-B-XX, 1998-0118-G-XX, and 1998-0118-J-XX, which are all I-10 widening projects on the West side of Houston. We do not call widening a freeway to 24 lanes of traffic a congestion mitigation project.

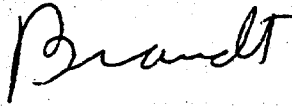
1999-0013-00, SH 99 grade separation at Bayhill Highland Knolls

1999-0014-00, SH 99 grade separation at Kingsland Blvd.

1996-0124-XX, SH 99 grade separation and interchange at IH-45 south

We appreciate this opportunity to comment. Thank you.

Sincerely,



Brandt Mannchen
Conservation Committee
Houston Sierra Club
5115 Maple
Bellaire, Texas 77401
H713-664-5962, W713-640-4313



Houston-Galveston Area Council

PO Box 22777 • 3555 Timmons • Houston, Texas 77227-2777 • 713/627-3200

May 14, 2001

Mr. Brandt Mannchen
Conservation Committee
Houston Sierra Club
5115 Maple
Bellaire, Texas 77401

Re: Comments on the DRAFT 2002-2004 TIP

Dear Mr. Mannchen:

Thank you for submitting attending the May 3, 2001 Public Meeting and providing your comments on the DRAFT 2002-2004 TIP. Responses to your comments are listed below.

- **I-69 NAFTA Corridor** – This project is not yet authorized for preliminary engineering, environmental analysis, right-of-way acquisition or construction activities. The TIP only includes funding for projects that have been authorized for these phases of work. Preliminary alignment studies for this project have taken place at a multi-state and statewide level. However, a preferred alignment for the route through the Houston-Galveston region has not yet been decided. Once I-69 is authorized and funded for project development and construction activities, the project would then be a potential TIP project.
- **Pages 1-6, Approval of cost overruns** – The TIP may be amended by the Transportation Policy Council, so long as proposed amendments are consistent with the Metropolitan Transportation Plan (MTP), as well as the availability of federal, state and local funds, and the MTP's finding of air quality conformance. If the TIP should require a major amendment, a public meeting and an additional thirty (30) day public comment period will be observed to discuss the proposed action(s). A major amendment is classified as the addition or deletion of a project with an implementation cost over \$1 million (excluding rehabilitation, maintenance and safety projects). Public comment on project additions or deletions of less than \$1 million may be sought at the discretion of the Transportation Policy Council (TPC). As long as a project's description, scope or expected environmental impact has not materially changed, the TPC may approve changes to project funding without benefit of a separate public meeting. Under the current TIP amendment policy, only cost overruns in excess of 25% require TPC approval.
- **Comments on CSJ 0028-02-055, US 90, from Oates to North of Mercury, construct 4-lane freeway with grade separation at Mercury, and CSJ 0028-02-070, US 90, 0.3 Miles E. of Wallisville to Uvalde Road, construction of two 3 lane frontage roads (Phase 1).** Your primary concerns related to the impact of these projects on the City of Houston's Herman Brown Park. According to TxDOT – Houston District staff, Herman Brown Park was originally planned in 1977, with right-of-way made available for the US 90 project. Please



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note that your concerns regarding Herman Brown Park will be forwarded to both TxDOT-Houston District and the TPC for their review.

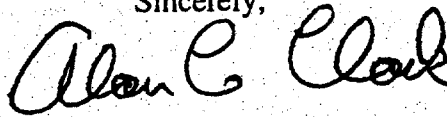
- **Comments on Air Quality Planning and Implementation:** For the 2022 MTP, H-GAC was directed by federal rules by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA) and the Environmental Protection Agency (EPA) to demonstrate conformity specifically on the 9% Rate of Progress Budget. Subsequently the EPA established a 2007 budget of 195 tons per day end NOx and 79 tons per day end VOCs in the Attainment Demonstration SIP, for which H-GAC prepared a new conformity determination for its 2022 MTP. Prior conformity findings utilized applicable SIP budgets as required by joint rulemaking of US DOT/EPA.
- **Comments on the Clean Air Action Public Outreach Program** – Specific details on past and future project activities are detailed in the Unified Planning Work Program (UPWP). The DRAFT 2002 UPWP is currently under development, but will be available for Public Review in approximately a month. You may view some of the past activities funded through this program on our website www.cleanairaction.org.
- **Bicycle/Pedestrian Projects** – The TPC background paper from 04/10/2001 correctly states that project readiness information was insufficient for the candidate bicycle pedestrian projects for the 2002-2004 TIP. Unfortunately, many project local sponsors have had a negative experience in bringing their CMAQ (and STP) funded projects to implementation. These problems have ranged from increased estimated costs, design, right-of-way and contracting difficulties. As a result, the MPO has been investigating alternatives to the current method of letting projects, and the current design standards. Further, in conjunction with the 2025 MTP the MPO will be updating the Regional Bicycle Plan this fall. Our hope is to provide a better framework for interagency coordination, project implementation, and incorporating an effective multi-modal, bicycle/pedestrian system. If nothing else, the experiences of local governments, the MPO and TxDOT with ISTEA and TEA-21 should indicate that the current model for bicycle/pedestrian project selection, implementation and design should be improved. As the MPO, we will work with our regional, state and federal partners to strive to do just that.
- **Comments on project descriptions** – Planning projects such as the Clean Air Action Transit Program and the Alternative Fuels Program are region-wide programs, and thus do not have specific project locations. As planning activities, these projects are described in greater details in the Unified Planning Work Program. Additional details on the TxDOT ATMS projects and Bicycle Pedestrian projects are given in Appendix I of the DRAFT 2002-2004 TIP distributed at the May 3, 2001 Public Meeting. (See Attachment) With regard to the Missouri City bicycle/pedestrian projects, the City of Missouri City is now considering the release of the balance of their CMAQ funds. A formal response from Missouri City is pending.
- **Comments on the IH-10 West Katy Freeway Improvements** – Your comments on these projects will be forwarded to the Transportation Policy Council (TPC) and TxDOT consideration.
- **Comments on specific Federally and Locally Funded Projects** – Your comments on these projects will be forwarded to the Transportation Policy Council (TPC) and TxDOT consideration.

Mr. Brandt Mannchen
May 14, 2001
Page 3

- **Comments on Appendix D (Projects Undergoing Environmental Assessment)** – Appendix D was provided with the DRAFT 2002-2004 TIP distributed at the May 3, 2001 Public Meeting. (See Attachment)
- **Comments on specific CMAQ funded activities** – These projects are carried over from the 2000-2002 TIP, and have been approved for implementation. However, your concerns will be forwarded to the TPC and TxDOT for their consideration.

Once again, your input in the regional transportation planning process is appreciated. Please feel free to contact Mr. Rick Beverlin at (713) 993-2456 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Alan C. Clark". The signature is fluid and cursive, with the first name "Alan" and last name "Clark" clearly distinguishable.

Alan C. Clark
MPO Director

ACC:rb

Attachment



May 16, 2001

Mr. Alan Clark
MPO Director
Houston-Galveston Area Council
3555 Timmons Lane, Suite 500
Houston, TX 77027

RECEIVED

MAY 16 2001

Dear Mr. Clark:

The Galveston-Houston Association for Smog Prevention (GHASP) appreciates this opportunity to comment regarding the Transportation Policy Council's Draft 2002-2004 Transportation Improvement Program (TIP), April 20, 2001.

We have three serious concerns: (1) In our analysis, the 2002-2004 TIP fails to comply with air quality regulations concerning vehicle emissions that contribute to the formation of ground level ozone. (2) The TIP fails to address the impacts of vehicle emissions from major highways on the health of people living, working, attending school, and recreating in areas adjacent to major highways. (3) The TIP emphasizes the misuse of transportation funds to expand highway capacity, and fails to reflect a vision for changing the relationship between highway expansion, the resulting decentralization of jobs and homes, and the unchecked growth of traffic.

The 2002-2004 TIP fails to comply with the Clean Air Act

Although many people in this region have recognized for over a decade that significant changes to Houston's transportation strategy are necessary to achieve clean air, the 2002-2004 TIP continues the practice of failing to set and meet adequate standards to protect public health. The results of the conformity analysis for the 2022 Metropolitan Transportation Plan project 228 tons/day NOx emissions for 2007. The current State Implementation Plan for reducing ozone in the Houston-Galveston area includes measures that TNRCC expects to reduce on-road emissions to 156 tons/day.¹ However, few if any state and local transportation control measures included in the plan appear to have potential for reducing per capita vehicle miles traveled.

¹ Using a base of 215 t/d NOx emissions projected for 2007, control measures affecting on-road emissions include inspection and maintenance (36 t/d); clean diesel (4 t/d); fleet replacement and other VMEPs (5 t/d); speed limit changes (12 t/d); H-GAC transportation control measures (1 t/d); and vehicle idling restrictions (<1 t/d).

It is generally understood that the proposed emission reductions included in the current SIP and in proposed revisions are inadequate to achieve expeditious attainment of national ambient air quality standards. Because the plans fail to take meaningful steps to reduce per capita VMT, the 2002-2004 TIP and the 2022 MTP fail to demonstrate that the road projects will not cause or contribute to any new violation, increase the frequency or severity of any violation, or delay attainment. Rather, the TIP and the MTP include many projects that are likely to lead to increased vehicle emissions and thereby contribute to the continuation of air pollution problems in the Houston area.

In the absence of a motor vehicle emissions budget recognized by the Texas Natural Resource Conservation Commission (TNRCC) and the U.S. Environmental Protection Agency (EPA) as demonstrating attainment with clean air standards by 2007, GHASP believes that H-GAC should adopt a build/no-build analysis approach as the basis of its conformity determination.²

Health-protective standards are needed

H-GAC has not demonstrated that the region's transportation system will offer travelers meaningful choices. The current transportation system unnecessarily promotes and subsidizes ever-growing trip distances to the detriment of citizen choice. In the absence of urban air modeling that convincingly demonstrates the attainment of air quality standards, GHASP asks the Transportation Policy Council to adopt health-protective standards. Modeling experts have suggested that a motor vehicle emissions budget of approximately 120 tons/day is likely to be necessary in order to fully protect human health.

However, because TNRCC has not convincingly demonstrated emissions budgets that will lead to attainment, the agencies responsible for implementing the Clean Air Act have effectively extended the conformity compliance deadlines and delayed substantive compliance under the Clean Air Act. Until transportation plans conform to motor vehicle emissions budgets that are part of a SIP that demonstrates attainment with air quality standards, it is our hope that H-GAC will proactively ensure that no transportation project will worsen existing violations of air emission standards or delay timely attainment of the NAAQS.

Reducing vehicle emissions to perhaps as low as 120 tons/day is inconceivable – unless transportation agencies are willing to rethink current mobility strategies. GHASP and other citizen groups have been calling for such reconsideration for years, but the absence of meaningful changes makes it increasingly difficult to reshape our transportation system in time to clean the air before the 2007 attainment deadline.

CMAQ funds are used for inappropriate and possibly illegal purposes

One of the most glaring problems with the region's transportation plans is the use of federal Congestion Mitigation/Air Quality Improvement (CMAQ) funds to support

² The build/ no-build test is required to show that the emissions from the transportation system in future years, if it included the proposed action and all other expected regionally significant projects, would be less than the emissions from the current transportation system in future years.

essential elements of highway expansion projects. Although the highest priority for CMAQ program funds is the implementation of transportation control measures to reduce emissions, recent policy decisions suggest that large portions of CMAQ funds are used for highway expansion.

At a minimum, GHASP favors changes to H-GAC policy such that that any project that benefits from CMAQ funding be subject to an analysis to determine the emissions impact of the entire project (including CMAQ-related and all other components). CMAQ funding should be allocated to such projects on the basis of this total project analysis rather than on a component-by-component analysis. Necessary components of freeway expansion projects must not be disguised as traffic flow improvement programs.

Transportation policies can be improved immediately

The Transportation Policy Council needs to adopt a proactive and health-protective standard for analysis of the 2025 Metropolitan Transportation Plan, and revise its funding allocation policies to include comprehensive emissions impact analyses. In order to make progress towards these goals, GHASP asks the Transportation Policy Council to make several immediate changes to the current TIP.

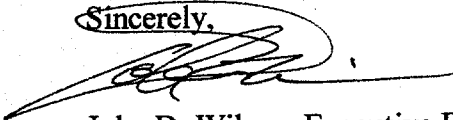
- The region's transportation plans do not prioritize funding for transportation projects that reduce vehicle miles traveled nor do they include incentives for "smart growth" redevelopment projects. GHASP is opposed to the use of CMAQ funds for intersection improvements or other projects that are related to capacity-enhancement projects. GHASP believes that this funding violates CMAQ guidance that establishes the ineligibility of construction projects that will add new capacity for single-occupancy vehicles. In particular, all work related to the expansion of the Katy Freeway should be funded from other categories of funding.
- Instead of spending CMAQ funds on projects that are integral to freeway expansion activities, we recommend that the region identify and fund projects that result in reduced per capita vehicle miles traveled (VMT). For example, local organizations have requested support for bicycle and pedestrian-friendly street improvement projects (such as those envisaged for Main Street and the Third Ward) and planning for improved transit linkages in the Galleria area. Numerous neighborhood initiatives to improve infrastructure in order to encourage local commerce and employment would be supported by making CMAQ funds available.
- GHASP also favors prioritizing CMAQ funds for purchase of low-emission transit and public fleet vehicles to the extent permitted by law. School bus fleets should be included in this opportunity.
- In order to determine whether major projects proposed for transportation funding will cause or contribute to any new violation, increase the frequency or severity of any violation, or delay attainment, we recommend more extensive environmental analysis. We favor using CMAQ funds for a comprehensive environmental analysis of the impacts of projects proposed for inclusion in the 2025 MTP,

including data collection and analysis on health effects, travel patterns, and other relevant topics beyond the insufficient existing data and analysis. Citizen groups should not be required to conduct original research because government agencies avoid the clear responsibility to act in the public interest.

- GHASP favors a suspension of all construction or major expansion of freeways in relatively undeveloped areas of the region pending revision of the Metropolitan Transportation Plan. Projects such as the Grand Parkway and the Westpark Toll Road are likely to exacerbate the difficulty of establishing a meaningful alternative to increasing VMT. Such projects create development patterns that compel longer drives for daily commutes, errands, and other travel needs.

Taking these suggested steps will not address all of GHASP's concerns, but will demonstrate a good faith effort by the Transportation Policy Council to begin to rethink transportation policy. Future steps that GHASP will advocate would include using other federal, state, and local sources to fund transportation projects and programs that will contribute to attainment and eventual maintenance of clean air standards.

Sincerely,



John D. Wilson, Executive Director
Galveston-Houston Association for Smog Prevention



Houston-Galveston Area Council

PO Box 22777 • 3555 Timmons • Houston, Texas 77227-2777 • 713/627-3200

June 13, 2001

Mr. John D. Wilson, Executive Director
Galveston-Houston Association for Smog Prevention
518 Woodland Street
Houston, TX 77009-7249

Re: Comments on the DRAFT 2002-2004 TIP

Dear Mr. Wilson:

H-GAC is in receipt of your May 16, 2001 correspondence providing GHASP's comments on the DRAFT 2002-2004 Transportation Improvement Program (TIP). H-GAC appreciates your participation in the TIP process. I would like to take this opportunity to respond to your comments and provide some clarification into the TIP process.

- 1) **The 2002-2004 TIP and 2022 MTP's compliance with the Clean Air Act** – The conformity finding for 2022 MTP and the TIP was established in April 2000 in accordance with the 9% Rate of Progress (ROP) budgets in the State Implementation Plan (SIP).
- 2) **Suggested Health Protective Standards** – Currently H-GAC follows motor vehicles emissions budget established by the EPA. H-GAC demonstrated conformity to current applicable budgets.
- 3) **Comments on CMAQ Funded Activities** – Transportation Control Measures (TCMs) and Voluntary Mobile Emissions Program (VMEP) projects received funding priority in the 2002-2004 TIP. A substantial portion of the CMAQ budget for the 2002-2004 TIP is dedicated to new transit service projects, which will also provide emissions reductions by decreasing trips in personal vehicles. Because of CMAQ funding made available in both the current and proposed 2002-2004 TIP, 50 engines in the current bus fleet are being replaced with new low emissions power plants and 5 "hybrid" buses will be purchased. These activities complement our electric bus demonstration projects to further emissions reductions from public bus fleets.

CMAQ funds will be utilized for intersection flow improvements in the 2002-2004 TIP. Intersection flow improvements such as turning lanes and signalization synchronization projects are eligible CMAQ funding activities that reduce vehicle emissions by reducing excessive vehicle idling and the frequency of "stops" and "starts" at signalized intersections. CMAQ funds have been programmed for improvements to encourage transit use, carpooling,

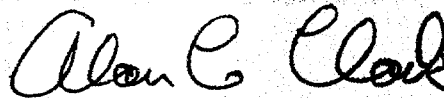


vanpooling and improved traffic management in IH-10 West corridor. These CMAQ eligible funded improvements do not add capacity for single occupant vehicular travel. Any and all added SOV capacity portions of the work along IH 10 West will be undertaken with other funding sources.

- 4) **General Comments on Transportation Planning Policies** – Your letter includes several general comments on the transportation planning process, many directly relating to the Metropolitan Transportation Plan (MTP) update scheduled for this fall. The TAC and TPC will be working over the next several months on the MTP update. Accordingly we will forward your comments to the TPC and TAC for their consideration.

Once again, your input in the regional transportation planning process is appreciated. Please feel free to contact Mr. Rick Beverlin at (713) 993-2456 if you have any questions.

Sincerely,



Alan C. Clark
MPO Director

ACC:rb