

APPENDIX 15
Public Comment Process

**HOUSTON-GALVESTON AREA COUNCIL
Public Comment Period and Public Meetings for
Major Amendments to the 2015-2018 TIP and
Transportation Conformity Determination for the 2015-2018 TIP and the 2040 RTP**

H-GAC is announcing the opening of a public comment period for Major Amendments to the 2015-2018 Transportation Improvement Program (TIP) as well as a new transportation conformity determination for the 2015-2018 TIP and the 2040 Regional Transportation Plan (RTP).

Proposed Major Amendments to the 2015-2018 TIP include the advancement of improvements to IH 45 South, IH 10 West, IH 610/IH 69 interchange, FM 1774 and Hempstead Road by the Texas Department of Transportation.

H-GAC has prepared a transportation conformity determination confirming consistency of the TIP and RTP with federal and state air quality requirements. This determination reflects the above Major Amendments and previous actions by the H-GAC Transportation Policy Council approving projects evaluated under the 2015 Call for Projects.

The public comment period begins Wednesday, March 16, 2016 and ends Friday, April 15, 2016 at 5:00 pm.

Two public meetings will be held on **Thursday, March 31, 2016, from Noon-1:00 p.m. and again from 5:30-6:30 p.m.** at the H-GAC offices, 3555 Timmons Lane, 2nd Floor Conference Room A, Houston, TX 77027. These meetings will also be available via webinar (register at <https://goo.gl/ceXaFk>).

The public is encouraged to attend and provide comments to H-GAC. Written comments may be submitted to Transportation Public Information, Houston-Galveston Area Council, P.O. Box 22777, Houston, TX 77227-2777, emailed to publiccomments@h-gac.com, or faxed to (713) 993-4508. For more information, please visit: www.h-gac.com/tag/transportation-public-outreach

Comments received during the public comment period will be provided to the Transportation Policy Council for their consideration.

The TIP is a multimodal program of transportation infrastructure and service improvements planned for implementation in the Houston Region over the next four years. It includes projects of regional significance for which federal, state and local funding is available or committed.

In compliance with the Americans with Disabilities Act, H-GAC will provide for reasonable accommodations for persons attending H-GAC functions. Requests from persons needing special accommodations should be received by H-GAC staff 24 hours prior to a function. The public meeting will be conducted in English, and requests for language interpreters or other special communication needs should be made at least two working days prior to a function. Please call 713-993-2471 for assistance.



PO BOX 66532, HOUSTON TX 77266-6532

April 15, 2016

Transportation Public Information
Houston-Galveston Area Council
P.O. Box 22777
Houston, TX 77227-2777
Email: publiccomments@h-gac.com

Comments: Major Amendments 50 & 51 to the 2015-2018 TIP

Dear H-GAC Staff:

The Citizens' Transportation Coalition (CTC) submits the following comments regarding the projects proposed in the major amendments 50 & 51 to H-GAC's 2015-2018 TIP. Generally

- We support H-GAC's continued efforts at public involvement;
- We hope that there will continue to be independent, publicly disclosed air conformity analyses with supporting data; and
- We support, although with significant qualifiers and conditions, all but one of the TIP major amendments 50 and 51 roadway projects.

The one project CTC does not support is the IH-45 expansion. We have set out specific reasons below, but we think there are much more serious and difficult fuel, chemicals and plastics, shipping, and freight issues that have to be taken up now for the area and the nation as a whole. CTC thinks that H-GAC staff, and particularly the planning, environmental, science, county officials, and transportation policy officials need to get involved in a major way with the USACE "Draft Environmental Impact Statement for The Coastal Texas Protection and Restoration Feasibility Study" if not negotiate for lead agency status at the planning stage. Deciding on infrastructure for protecting our environment and crucial industries is of nationwide importance and would be of far greater benefit to the persons and environment who reside in the Galveston and other coastal areas than expanding IH-45 yet again.

Public Involvement

CTC greatly appreciates that H-GAC posted information online, including its webinar presentation, about the major TIP amendment projects. Greater public involvement is almost always beneficial to the multimodal transportation planning processes and forces notice, disclosure, and interagency cooperation and accountability. The public can often point out flaws or make alternate suggestions to be considered, adopted, or ruled out,

particularly about local operability and functionality which help achieve the required performance metrics.

Conformity Determinations and Disclosures

The conformity determinations underlying the #50 and #51 projects were complex. CTC hopes that H-GAC will continue to publish H-GAC analyses regarding conformity in the spirit of transparency and science-based criteria and release as much data as possible to enable the public to replicate the results.

H-GAC is the region's most independent platform for aggregating and modeling such data. Such disclosures and scientific analyses are rare with other transportation agencies. CTC lacks the data and assumptions used by H-GAC to derive the results found by H-GAC and does not questions those here.

CTC asks that H-GAC continue to improve and disclose its truck and other heavy vehicle data collection, forecasts, and emissions modeling of particulate matter, especially PM2.5. These data and forecasts can be used not only for air pollutant modeling, but also for traffic noise modeling.

Hempstead Road

This project is described as including signalization improvements. Much fuel and time can be saved with good and reliable signalization. This will be a good project to really get some brain power behind the idea of signalization improvements and optimization for complicated, multimodal intersections. We hope this will not be 1990s ITS. If this works here, it could be used as a pattern for many types of roadways in the H-GAC area and across Texas.¹

CTC generally supports all genuine signalization improvements and strongly supports the expanded use of Hempstead Highway contingent upon preservation of space for a passenger rail right of way.

Improved signalization enhances the capacity (or usability and access) of at grade local streets and state highways.

Major problems we see with achieving signalization improvements, let alone optimization, for the Hempstead Corridor include

- Houston's traffic lights go out often;
- Signals are then out of sync undermining the benefits of the signalization program.
- There are many major street crossings across Hempstead;
- There is currently no grade separation on Hempstead;
- There are many railroad crossings abutting Hempstead whose somewhat unpredictable operation affects the flow of traffic and the timing of the lights.

¹ As well as the disgusting Hwy 71 Bastrop to Austin to Bee Cave and other similar time holes.

Some of these signalization modeling problems are particular to Hempstead, but the problems are generally apparent throughout Houston.

If we are serious about integrating commuter or other heavy rail to the project, we probably need to find sufficient funds to construct well-placed grade separations on Hempstead. Traffic lights cannot do it all.

Washington Ave.

CTC generally does not support more highway development for Washington Ave. unless the funds will be used to fix the railroad overpass constraint.

CTC hopes that oblique references to highway widening refer to the very old and narrow vehicular underpass at the rail crossing of Hempstead Rd just north of its merge with Washington Ave. This should be more clearly indicated in order to avoid any potential confusion with the nearby previously halted construction of rail overpasses for the IH10 frontage roads just east of W/Ave.

Further, CTC recommends that this project be tightly integrated with Hempstead Road improvements both as to alignment and operations. Toward that end TxDOT and H-GAC should advise the public just what the intent and function is with respect to future use of Washington Ave.

Washington ties into IH-10 regardless of whether federal funding is used, so federal law has to be followed both with respect to design and environmental impacts.

CTC recommends this stretch of road be upgraded mainly to support light or commuter rail, to provide needed clearances for modern 20-year trucks, and improve freight rail overpasses.

As a design feature, while the money is being spent on the old underpass, widening the area at the railroad underpass to leave space for an additional future lane for roadway or space for light/commuter rail in each direction would also be good forward planning even if the lane is not yet needed and is stippled.

Some of the FAST money should be used to rebuild the freight rail bridge crossing. That way citizens get a good capacity major arterial built to standards plus a rail bridge above it that promotes freight safety and efficiency. Through FAST, there are funds sources for the freight rail bridge. FAST clear promotes and creates funding provisions for interagency freight rail improvements. Freight rail improvement is one of CTC's ten principles.² Moving freight by rail is efficient, uses less fuel, and takes up less capacity than an equivalent load on a surface road.

² CTC Principle 6. "Invest in the advantages of freight rail. Each rail car takes as many as three trucks off Texas highways, and one train can move one ton of cargo 436 miles on 1 gallon of fuel. Enabling more freight to move by rail will reduce congestion, improve safety on our roadways, reduce pollution, and minimize right-of-way requirements. Texas voters authorized the Freight Rail Relocation & Improvement

This street impacts the north side of Memorial Park. A 4(f) analysis must be done of the proximity impacts and this obligation has been dodged long enough. At the very least the surface of the new road segment should be Next Gen concrete.

IH 45 South-S of NASA Rd to Galveston Co Line

As noted in our summary above, we do not support this project at this time.

CTC thinks that all counties and areas in H-GAC should receive the benefit of federal and state funding so Galveston county should not be short-changed. But Galveston County and South Harris County could put the funds to a more efficient use for improving the quality of life and safety for all in that area than more IH-45 which will cause more land development along the highway.

CTC recommends that there be a broad based 10-20 year technical study regarding just what H-GAC and TxDOT are trying to do in the coastal area.

Better planning and time constraints are needed for IH-45: we have been building and expanding IH-45 for over 50 years! If this money is spent, it has to be accompanied with a publicly disclosed regional plan and timeline for that area. We just rebuilt the causeways. We just built the Grand Parkway including sections officials assured would not be built. To us in the public, it appears that we do not have a rational path forward for major interstates or storm surge concerns that close to the coast.

With the great amount of feeder road along IH-45 South, CTC fears that a primary motivation is further land development along IH-45 apart from any high minded claims about evacuation routes that were supposed to have been solved by the GP. It can be readily observed that feeder roads contribute to local congestion.

In terms of protecting our safety, shipping and freight facilities, and major fuel sources and preventing fuel spill environmental catastrophes, H-GAC should have real participation in development of analysis of the major environmental issues being tackled in the USACE's "Draft Environmental Impact Statement for The Coastal Texas Protection and Restoration Feasibility Study." H-GAC takes the agency lead in many of these issues. Right now the proposed DEIS is just at the scoping stage, but it is time to jump in and figure out funding issues. HGAC must decide what the public policy is with regard to protecting our fuel, chemical, and shipping operations in the context of this study.

These issues have far more importance to the H-GAC area than more construction contracts for IH-45. The use of funds for the proposed road may not be the best expenditure in that area and should be viewed from the performance metrics standard—

fund in 2005 and it's time to fund it. MAP-21 and FAST both have specific federal funding provisions for freight."

what is the net improvement. H-GAC, Galveston and So Harris County officials, and the public have to decide what sort of protection, if any, we are going to have for our coastal lands and our refineries and chemical plants and invest funds accordingly.

IH 10 West

This is a project that should have been commenced long ago. There is so much congestion on IH-10 west of Katy, that all clean air and mobility benefits touted by our greatly expanded Katy Freeway (of which CTC has always been skeptical), are wholly negated during peak periods. To ensure that the mobility gains are preserved, no feeder roads should be built for this IH-10 extension, and any commercial development should be encouraged only at perpendicular streets or county roads at the exits. These new lanes IH-10 lanes should not be tolled.

IH 610/IH 69 Interchange

CTC supports this plan in principle, except we do not think it goes far enough. This interchange should have been completely rebuilt 25 years ago. That would have enabled H-GAC, FHWA, TxDOT, Galleria merchants, and Houston citizens better to assess the real congestion around the Galleria, not just that caused by people weaving into and out of the local shopping area, for which interstates are technically not supposed to be built. Instead this is the last piece being built, rather than the first! CTC would support broadening this project to all pieces of the interchange not yet rebuilt and making certain it is integrated into new projects for Bellaire. TxDOT design engineers and consultants should hold several meetings to explain this complicated project to the public.

Best Regards,

/s/ Dexter R. Handy, Lieutenant Colonel, USAF Retired
Chair, Citizens' Transportation Coalition (CTC)
phone: 832-724-8753 email: drhandy@aol.com

Contributors: Carol Caul, Advocacy Chair; and CTC Board Member; Tom Dornbusch, President of SN22 and CTC Board Member; Dexter Handy, CTC Chair, Ed Browne, President, Spring Branch West SuperNeighborhood, and CTC Board Member



Houston-Galveston Area Council

April 19, 2016

Mr. Dexter R. Handy
Chairman
Citizens Transportation Coalition (CTC)
P.O. Box 66532
Houston, Texas 77266-6532

Re: Response to Comments on Major Amendments 50 & 51 to the 2015-2018 TIP

Dear Mr. Handy:

The Houston-Galveston Area Council (HGAC) appreciates the time you have taken to publicly comment on our pending transportation conformity determination and 2015-2018 TIP Amendments #50 and #51. We agree that the public comment process is one of the most important aspects of transportation planning. Please find below responses to your submitted questions and comments organized to match the structure of your letter.

General Comments and Introduction

H-GAC appreciates your support of the metropolitan transportation planning process and your continued engagement in our public participation efforts.

H-GAC works with our local governments on a number coastal resilience issues ranging from hazard mitigation plans and evacuation planning to disaster recovery assistance. H-GAC also contributes expertise to various groups working on coastal protection, including the Rice University SSPEED Center, Texas A&M Galveston, the Texas General Land Office, and the Gulf Coast Community Protection and Recovery District.

H-GAC is not directly involved in the development of a Draft Integrated Feasibility Report and Environmental Impact Statement (DIFR-EIS) by the U.S. Army Corps of Engineers. The USACE recently initiated this action with the filing of a Notice of Intent on March 31, 2016. Through the ongoing efforts identified above and available historical, current and forecasted data products H-GAC is available to support our local governments and the USACE as the planning and environmental review process progresses.

Transportation Conformity Determination

Modeling regional transportation activity and its effect on air quality is a complex process. H-GAC makes every effort to release data in a way that it will be most useful for the public. H-GAC employs the latest data collection and emissions modeling technology. As documented in our air quality conformity information, emissions estimates do not utilize location specific vehicle classification data. The EPA emissions model (MOVES) determines vehicle emissions characteristics based on county level vehicle registrations.

Hempstead Road

The proposed improvements focus on intersections along Hempstead Rd including railroad grade crossing improvements and enhanced signalization. Improving signalization across the region is an important aspect of transportation planning. Per federal and state law, only the latest best-use technology is approved for deployment.

As this project is operational in nature, it is beyond the scope of the current investment to acquire the significant right-of-way that will be needed to implement a high capacity transit service in the corridor.

Your interest in grade separations along the corridor is addressed, in part, by the proposed Hempstead managed lane facility. This project would provide a continuous grade-separated access-controlled roadway and is included in H-GAC's long-range fiscally-constrained 2040 Regional Transportation Plan.

Washington Avenue

H-GAC notes that the current railroad underpass will be completely reconstructed to current design standards as part of this project.

The limits of the project are clearly stated as Hempstead Rd & Washington Ave, from west of 12th Street (Hempstead Rd) to east of the Washington Ave / Katy Road split; in no way does this extend to IH10 frontage roads.

The description of the project is "CONSTRUCT 6-LANE DIVIDED URBAN ST FACILITY W/ AUTOMATIC PUMP STATION AND RR LINE W/ UNDERPASS (PHASE 2)". As such, the project involves the widening of the current 4-lane roadway to 6-lanes. It is beyond the scope of this current investment to preserve additional right-of-way for future roadway widening or high-capacity transit.

H-GAC continues to promote a regional outlook when it comes to transportation projects. Due to their proximity with one another, the proposed improvements on Washington Ave and Hempstead Rd have been developed in concert and are intended to support local and regional trips along the corridor.

While the Fixing America's Surface Transportation Act (FAST Act) does consider freight-related highway improvements and provides funding for nationally significant freight and highway projects, this current investment will utilize funds available under other federal-aid highway programs. The specific sources of funds are noted in the draft amendment.

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried-out by TxDOT pursuant to 23 U.S.C. § 327 and a Memorandum of Understanding dated December 16, 2014, and executed by the FHWA and TxDOT. This includes Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303, and 23 U.S.C. § 138.

IH 45 South

We appreciate the CTC's comments regarding coastal resiliency and refer to our response under the General Comments and Introduction section regarding H-GAC's involvement in these issues.

The proposed IH-45 S improvements include numerous safety enhancements, extend the HOV system to south of NASA Road 1 Bypass, and include appropriate consideration of pedestrian and bicycle accommodations along the frontage roads. The projects received careful scrutiny as part of H-GAC's 2015 Call for Projects and were evaluated using quantitative and qualitative criteria to identify the most beneficial and cost effective projects.

IH 10 West

The proposed project would widen the existing mainlanes from 4-lanes to 6-lanes which will not be tolled. The proposed project does not include construction of additional frontage roads. The permitting of additional frontage roads and interchanges is managed by TxDOT and changes to Interstate access require approval from FHWA.

IH 610/IH 69 South Interchange

Comments noted. TxDOT has conducted a number of open houses, public meetings and hearings regarding the proposed interchange project, including an open house in Bellaire on March 3, 2016. Additional information regarding TxDOT's development of the project can be found online at: <http://goo.gl/jJupi3>

We hope our responses to your comments have been useful. We thank you for your continued support of our efforts to involve and inform the public in the metropolitan transportation planning process.

If you have any questions regarding these responses, please contact David Wurdlow via email at david.wurdlow@h-gac.com or you can reach him by phone at (713) 993-2490.

Sincerely,



Alan C. Clark
MPO Director

AC/dw

CC: Carol Caul, CTC
Bill Brudnick, TxDOT
Andrew Mao, TxDOT
Pat Henry, TxDOT