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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:

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.

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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.

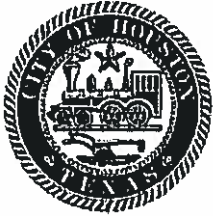
Sincerely,



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



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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 Environmental 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,

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Veronica O. Davis
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Veronica O. Davis, PE
Director
Transportation & Drainage Operations

DocuSigned by:
David Fields
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David Fields, AICP
Chief Transportation Planner
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