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June 15, 2021

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

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

Dear Mr. Raborn:

This letter is in response to Air Alliance Houston's (AAH) undated correspondence regarding comments on the Houston-Galveston Area Council's (H-GAC) 2045 Regional Transportation Plan (RTP) Amendments.

The Texas Department of Transportation (TXDOT) will not respond to comments from AAH regarding the Air Quality Conformity documents. H-GAC, as the entity responsible for the long-range plan and associated air quality conformity process, and its air quality expert and AAH Board Member, Graciela Lubertino, PhD is better suited to address those questions.

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

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

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

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

The Governor has declared the State open and businesses are returning to normal. TXDOT anticipates higher-than-normal traffic volumes as many individuals may shift from transit to SOV for personal health reasons. In addition, traffic patterns may have changed. For instance, in addition to fewer people using transit, there may be fewer people traveling from home to work during peak periods and more people may be running errands during the day. Nevertheless, the volumes have rebounded, therefore telecommuting does not seem to have had a significant impact on the State’s transportation system.

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

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

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

To accomplish TXDOT’s mission, we use some of the most rigorous industry methods to develop our portfolio of projects and to move those projects through project development toward implementation. There is a myriad of scientific methods TXDOT uses and studies we perform to make decisions about the need for investment and to determine the types of improvements that are required to meet public needs. Our improvements follow industry-standard, federal, and state guidelines for engineering analysis and always consider environmental impacts. Whatever study method is employed, every project goes through the National Environmental Policy Act (NEPA) clearance process and TXDOT’s major projects also go through stakeholder engagement and the public involvement process.

TXDOT's stakeholder and public engagement process is second to none in the Houston region. No other local government or transportation agency goes through the extensive and rigorous project level public involvement that we do. In fact, other agencies should be held to the same high standard. TXDOT's level of engagement is appropriate given the diversity of use and volume of vehicles we accommodate within the region including SOV, carpools, vanpools, buses, and freight haulers. We are not focused on 1 mode choice over the other. That is not TXDOT's mission. We move people and goods across a ground transportation system in whatever mode choice the user decides is appropriate.

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

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

I-45 at I-10 (MPOID 16328)

The I-45 at I-10 project already exists in the 2045 RTP and the associated conformity determination. In fact, this project has been included in the Region's long-range plan for many years. The characterization by AAH that the Federal Highway Administration (FHWA) "has ordered TXDOT to halt all further action on the North Houston Improvement Project" (NHHIP) is patently false. FHWA requested "that TXDOT pause before initiating further contract solicitation efforts until FHWA has completed its review and determine whether any further actions may be necessary to address those concerns." This FHWA request and its on-going Title VI (6) investigation do not preclude the project's inclusion in the Region's long-range plan nor has the State been enjoined from conducting project development activities.

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

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

TXDOT is unwavering in its commitment to provide high-quality, safe multimodal transportation that is accessible to everyone in the region and beyond. Our facilities are not limited to the SOV. Any ground transportation mode can access TXDOT's facilities, subject to appropriate laws. We do not believe it's in the Region's best interest to cause congestion by limiting or reducing capacity improvements to the State system to spur behavior change toward higher occupancy commuting and transit ridership. The improvements TXDOT provides are not only for capacity, our improvements increase safety and enhance the driving experience by creating a facility that operates more comfortably for all modes. H-GAC's long-range plan indicates the Region's population will swell to nearly 11 million by 2045. It will take all of us working together to provide an integrated and robust ground transportation system that provides users options, so they can decide which mode meets their needs.

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

Thank you for the opportunity to respond. Should you have any questions please contact my office at (713) 802-5001 or via email at eliza.paul@txdot.gov.

Sincerely,



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

Attachment

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



H-GAC Staff
3555 Timmons Lane, Suite 100
Houston, TX 77027

To whom it may concern,
Below are Air Alliance Houston's public comments regarding the Draft 2021 Transportation Conformity and the proposed 2045 Regional Transportation Plan amendments.

Air Quality Conformity

Air Alliance Houston appreciates the opportunity to comment on these documents. In the Air Quality Conformity documents, we've noted a number of discrepancies and/or mistakes. We've listed them below:

- In the "Estimation of Vehicle Activity" section (pg. 14), the document states the previous conformity was conducted in 2015 and 2016 for the 2040 RTP. This is incorrect. The previous conformity was conducted in 2018 and 2019 for the 2045 RTP.
- In the same section on the following page (pg. 15), the document states multiple times that the base model year for traffic counts is 2012. However, Appendix 4 (which this section references) shows a base year 2016 model. Page 2 of the "Executive Summary" document asserts that conformity requires the "latest planning assumptions" to be employed; was the 2012 or 2016 model used? Either the conformity employed old metrics or the conformity document is wrong.
- The tables on page following (pg. 16) are confusing and should be clarified. In addition to not being clearly explained, the two tables use two different projection years (2040 vs 2045). Is there a deliberate reason for this?
- Table 4.3 (pg. 20) again references the 2012 base year model
- 4.7.2 claims that Table 4.7 shows centerlane miles for each conformity year, but those are not the conformity years.

Beyond these errors in the regional conformity document, our organization has concerns about the approach to regional air quality overall. The control strategies detailed in the new State Implementation Plans are the same control strategies the region has committed to in previous State Implementation Plans (SIP), yet our region continues to fail to meet the ozone standards. In fact, the EPA advanced our region to "serious" nonattainment in its most recent ruling. Why is the H-GAC continuing to advance control strategies that have proven to be insufficient?

Air quality conformity should not be treated as an obstacle to be circumvented in order to continue building infrastructure without consequence. Resubmitting old and failed control strategies to be included in the SIP, in addition to the lack of focus paid to the conformity

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documents, suggests that the H-GAC does not consider our region's failing air quality a serious issue. We ask that the H-GAC correct the errors in the document, clarify if the conformity is based on 2012 or 2016 base year models, and consider committing to more stringent control strategies for mobile sources, like the creation of mass transit projects instead of favoring adding capacity projects that generate more air pollution and congestion like the NHHIP.

RTP Amendments

Our organization, Air Alliance Houston, is opposed to three proposed amendments to the 2045 RTP: MPOIDs 18708, 18709, and 16328. The first two amendments represent TxDOT's proposals for additional managed lanes along the I-10 corridor. Although TxDOT released video presentations and documents supporting the proposed project, and held a virtual open house, TxDOT has failed to demonstrate the need for this project. Below are comments our organization submitted to TxDOT earlier this year on their proposals:

Our organization is skeptical of TxDOT's stated need for the I-10 Inner Katy Corridor Managed Lanes Project and disagrees with TxDOT's assessment that the project will yield any significant benefit to travel times. TxDOT's proposals appear to be a continuation of a pattern of adding capacity for passenger vehicles (and, as a result, SOVs) at the expense of transit and communities along the proposed corridor. TxDOT has continuously used population growth projections as a justification for expanding highways, but population growth in a vacuum is not an appropriate rationale for moving this project forward. We've seen similar rationales used to support projects like the North Houston Highway Improvement Program, which has resulted in inaccurate depictions of our region's actual transportation needs.

Noticeably absent from TxDOT's paltry list of facts and figures meant to justify the need for the project is any figure of traffic volumes from the past five-to-ten years on this corridor, (peak hour traffic for 2019 is given, but is only compared to a 2045 projection, and no other trend is identified or given). Also absent was any explanation of how this project fits into local entities' visions for transportation infrastructure in our region or any consideration or analysis of how the COVID-19 pandemic will alter transportation usage going forward. Any preliminary considerations of air quality or greenhouse gas emission impacts are also concerningly absent.

Our organization is also unsure of TxDOT's preferred alternatives presented. There is little information given on how TxDOT arrived at these designs, or why additional Right of Way is needed. We believe it is disingenuous to present these designs to the public as the three best options for improving travel on this corridor; TxDOT must consider consulting communities prior to creating designs, or else we will continue to see projects that have little justification and minimal support from the general public.

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AAH is concerned that construction will disrupt or delay construction for METRO's timeline, and that the added managed lane infrastructure will make accessing METRO's BRT more difficult.

We have not received a response from TxDOT. Several other organizations and individuals submitted comments on these proposals; TxDOT has failed to respond to any of them. While we understand that the amendment to add the project to the RTP is more administrative than substantive, our organization generally opposes token public engagement and feels that TxDOT should respond to comments received prior to advancing this project to the next stage. Failing that, the H-GAC should hold its project sponsors accountable by refusing to advance the amendment until a genuine public engagement process takes place and actual need for the project is demonstrated.

Air Alliance Houston opposes the amendment for MPOID 16328 because TxDOT and the NHHIP are subject of an ongoing civil rights investigation. Additionally, the Federal Highway Administration (FHWA) has ordered TxDOT to halt all further action on the project. During one of the RTP open houses conducted in April 2021, H-GAC MPO Director Craig Raborn explained that the agency does not believe advancing this amendment would be in conflict with the FHWA's orders. Our organization would like to receive clarity on this statement - did the FHWA communicate this information directly to the H-GAC? If so, is there documentation? If not, our organization holds concerns that the H-GAC could be advancing a TxDOT project against an FHWA directive. Regardless of the technicality of the issue, though, AAH believes that the intention of the FHWA halt order is clear and that the H-GAC should act in good faith with the order by denying the amendment.

Sincerely,

Harrison Humphreys
Transportation Policy Advocate
Air Alliance Houston

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