

April 28, 2021

Transportation Policy Council (TPC)  
Craig Raborn, Transportation Director  
Houston-Galveston Area Council (H-GAC)

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**RE: Comments on proposed 2045 Regional Transportation Plan amendments**

Dear Mr. Raborn and TPC Members:

We submit these comments in response to the two virtual public meetings held by H-GAC on Thursday, April 8, 2021, to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). People should be able to reach such opportunities in the Houston region safely and with dignity by walking, rolling, biking, and riding transit. These deeply affordable options must be as viable as those afforded by people able to, or choosing to, own and operate personal vehicles. To that end, LINK Houston advocates for a robust and equitable transportation network so that all people can reach opportunity. We strive to be anti-racist and center equity and climate justice in all we do.

Several of the proposed RTP amendments are major highway infrastructure concepts for corridors in Houston through existing residential and commercial development. We have serious concerns about the proposed scope and schedules of these proposed additions to the region's 2045 Regional Transportation Plan. The amendments are not for projects in the distant future. Rather, the amendments requested by the Texas Department of Transportation (TxDOT) propose construction beginning by 2030, within the 10-year Transportation Improvement Program (TIP) program of projects. This gives rise to our primary concern and why we ask TPC to not accept the amendments to the RTP.

**TxDOT is premature and acting on outdated concepts. TPC should reject the TxDOT amendments and instead provide leadership by directing the agency to thoroughly implement the federally required process to engage communities and interagency partners to:**

- (1) Identify if a project is actually warranted and to identify need and purpose (i.e., following the Planning and Environmental Linkages (PEL) process); AND THEN IF WARRANTED...**
- (2) Explore a full suite of project alternatives through interagency cooperative planning and in concert with directly adjacent communities (i.e., develop alternatives that satisfy the "critical links between transportation needs and other societal goals").**

The Federal Highway Administration (FHWA) *Transportation Planning Process Briefing Book* states the following in the introduction,

"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.*" [emphasis added]

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments will bypass the Planning and Environmental Linkages 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 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."

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**LINK Houston believes thorough community engagement to develop qualitative data and thorough quantitative analysis of transportation demand, travel patterns, and environmental impacts are both warranted given travel preference trends and technologies, recent telework experience, and technological advances changing how and when people and goods move.** Data from these analyses will impact the need and purpose for each project. The PEL process, quantitative data analysis, and qualitative data from engagement must be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated.

The proposed amendments are for transportation projects inseparably connected with other goals and plans. The City of Houston Climate Action Plan, Resilient Houston, Vision Zero Strategy, the METRONext Moving Forward Plan, and other local plans are all more recent than the outdated thinking behind TxDOT's requested amendments. Houston and the region deserve better. We can do better. Our residents and businesses need us to be better. **One way to stretch and be better is for TPC to require project sponsors to incorporate locally supported goals and plans into the purpose and need for corresponding projects.** For example, projects within the City of Houston must incorporate goals from the Climate Action Plan, such as to "Reduce Vehicle Miles Travelled per capita 20% by 2050."

**LINK Houston suggests TPC instruct H-GAC staff to conduct a study, including extensive public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP.** The combined Inner Katy Managed Lanes, I-610 W Managed Lanes, and Hempstead Highway 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 express access lane concept. 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 benefits and burdens of transportation policies and systems should be equitably allocated across communities so we collectively address past harm and neglect to ensure that all people can reach opportunities in the future. 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."



# LINK HOUSTON

The public expects H-GAC to fulfill its mission. Likewise, the public expects TPC to provide leadership built upon the foundation of sound thinking and fair representation – with deep mutual respect for members representing the locations where projects occur.

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Thank you for the opportunity to provide comments on the proposed amendments to the 2045 RTP.

Sincerely,



Oni K. Blair  
Executive Director  
LINK Houston

**P.S. Below are project-specific comments on proposed RTP amendments. We make these additional comments in full support of the City of Houston's, residents', and business owners' posted comments.**

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## Hempstead Highway/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 H-GAC 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."

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## I-10 W from I-610 W to I-45 N

*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.



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## I-610 W from I-10 W to I-69 S

*Proposed Amendment. Construct 4 express lanes.*

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Chair

- Traffic analysis requires update to reflect changing technologies, including telework.
- Managed lanes operations are undefined.
- Previously canceled due to significant public opposition.

Bill Fulton  
Vice Chair

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## I-10 W 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.*

Adrienne Mangual  
Treasurer

- Maintain METRO Inner Katy Bus Rapid Transit (BRT) dedicated access to downtown.
- Removal of structures from the floodway consistent with Resilient Houston goals.

Elizabeth Love  
Secretary

Richard Petty  
Immediate Past  
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**LINK Houston provided detailed comments to TxDOT and METRO in February 2021: [Public Comments on Inner Katy Corridor](#). We are concerned about TxDOT's I-10 Inner Katy Managed Lanes Project, but generally support the agency's I-10 Inner Katy Drainage Improvements Project to better manage flooding. TxDOT is exploring if the state should add four managed lanes to I-10 and/or improve flood mitigation.**

Dr. Denae King

Janis Scott

**In LINK Houston's view, a successful I-10 Inner Katy Managed Lanes Project serves high-occupancy vehicles (or enforces high/variable tolls on all vehicles with only one occupant) and does not in any way impede the quality of the Inner Katy METRO Rapid Bus Rapid Transit (BRT) line and stations. The new BRT line is the additional transportation capacity in the corridor supported by the region's plans. TxDOT had the opportunity to create managed lanes when originally expanding the highway in the 2000's and chose not to do so.**

Michael Skelly

Berenice Yu

James Llamas

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## SH 35 from Dixie Drive to Brazoria County Line

*Proposed Amendment: Construct new 6 lane freeway with new 2-lane frontage roads.*

Toby Cole

Oni K. Blair

- 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.

