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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,

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