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June 19, 2008

Mr. Alan Clark
Transportation Department
Air Quality Section
Houston-Galveston Area Council
P.O. Box 22777
Houston, Texas 77227

Dear Alan,

Enclosed are the comments of the Houston Regional Group and Lone Star Chapter of the Sierra Club regarding the Revised Conformity Finding for 2008-2011 Transportation Improvement Program (TIP) and the 2035 Regional Transportation Plan (RTP).

The Sierra Club's preliminary comments are as follows:

1) HGAC should develop TIPs/RTPs that spend transportation dollars where the people and congestion are. HGAC is not doing the public a service or a favor by supporting proposals, like the proposed Grand Parkway (present estimated cost of \$5.4 billion), where there is undeveloped land, few people, and little congestion. This particularly makes no sense when gasoline is \$4/gallon and is expected to rise as the price of oil/barrel continues to rise.

We need to get people out of the one person/one vehicle mode of travel and efficiently and quickly get them to their destinations. More highways constructed farther out just increases the length of the congested journey instead of providing mobility and access to people. Why subsidize developer's who ensure that their own monetary success is built on the back of everyone's additional congestion? Why make the Katy Prairie, Brazos Bend State Park (with its Columbia Bottomlands), and other natural areas pay the price for subsidized development that creates more congestion? This makes no sense and is not in the public interest and does not protect the "Public Commons", our air, water, wildlife, infrastructure, and taxpayer financial resources.

2) Additional ozone, nitrogen oxide (NOx), volatile organic compound (VOC), and other ambient air monitors are needed so that better modeling can be done. Except for Harris County, other counties either have no monitors (Fort Bend and Waller Counties) or very few monitors (Montgomery, Liberty, Chambers,

"When we try to pick out anything by itself, we find it hitched to everything else in the universe." *John Muir*

Galveston, and Brazoria). It is obvious that additional air monitors in rural areas are needed for transportation, transport, and biogenic emissions information.

3) Research is needed about the amount of air pollution that different vehicles emit during actual, in motion, trips. This information is crucial for the improvement of MOBILE6 and its variants, would make the grid modeling immeasurably more precise, and would make prediction of ozone attainment more accurate. There is a need to more accurately depict the typical driving trip that MOBILE6 depends on for emissions estimation and mobile source inventories in the Houston area.

4) The Sierra Club is very disappointed that Metro and others support turning High Occupancy Vehicle (HOV) lanes into High Occupancy Toll (HOT) lanes. HOV lanes were placed in the ozone State Implementation Plan (SIP) as a control measure that would reduce NOx and VOC emissions from vehicles by encouraging the use of buses, carpools, and vanpools instead of one person/one vehicle. Now Metro and others are sending mixed signals that say "you should not have to share a ride and now you do not have to".

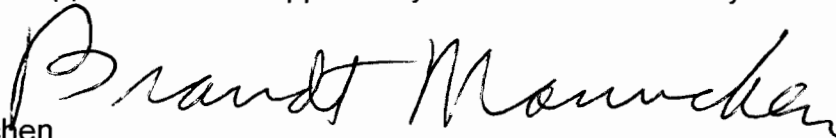
In addition, this proposed action by Metro and others lets certain people with more money to spend on the one person/one vehicle mode of travel be favored over everyone else. We will not get more people to ride mass transit using this strategy.

Since the HOV lanes were originally included as a control measure and contributed a certain amount of NOx and VOC reductions for the ozone SIP a new SIP is needed which subtracts the NOx and VOC reductions that HOVs provided and adds control measures that equal or exceed these former reductions.

5) The Sierra Club supports Metro's proposed plan to expand the rail system via Metro Solutions corridors in the North, Harrisburg, Southeast, and Uptown areas of Houston.

The Sierra Club appreciates this opportunity to comment. Thank you.

Sincerely,



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