

Appendix 16

Public Comment Process

For public comments please refer to the following RTP appendices:

- RTP Appendix I: Public Outreach
- RTP Appendix A: Envision Houston Region
- RTP Appendix C: Environmental Justice
- RTP Appendix F: Public Transportation Coordination
- RTP Appendix G: Pedestrian/Bike Regional Plan Summary

EPA's Comments: Please refer to H-GAC answers in yellow

- 1) The conformity checklist seems to be missing; please supply it if you've completed it.
Done-Appendix18
- 2) Has the Transportation Board adopted the MTP and conformity docs yet? Please include the resolution in the final package.
The TPC resolution is there now (Appendix 1)
- 3) Also, please include the comments/responses from the public comment period in the final submission.
There have been no comments on conformity
- 4) Table 2 on page 12 and Table 11 on page 38 should match. (I think Table 11 is the correct one.)
Yes, you are right table 11 is the correct one, but Shelley had said during the conference calls that we were not going to take credit for VMEPS and TERP this time because we were way under the budget and every body agreed...may be I should rename table 11 as "Final emissions results taking into account VMEPS and TERP"
- 5) Section 1.0, Introduction, page 14: please update the final sentences in this section as indicated:
"The EPA has promulgated four many separate amendments to the conformity rule, most recently in July 2004 October 2006. The EPA has also proposed new rules affecting the conformity the eight-hour ozone standard. This conformity takes advantage of Section 93.119 of the new conformity to use an interim emissions Test for the purposes of the eight-hour conformity."
Citing 93.119 is not correct in this case; 93.119 deals with demonstrating conformity in the absense of MVEBs.
Done. Changed for "This conformity uses the 1-hr MVEBs from the Mid Course Review SIP per 40 CFR 93.118"
- 6) Section 1.2, Purpose, page 15: please delete the third bullet point in this section which reads "Do the RTP and TIP contribute to annual emissions reductions..."
The cited sections of the Clean Air Act (182(b) and 187(a)(7)) do not apply here. **Done**
- 7) Section 1.3, Conformity Criteria, page 15: please delete the last bullet which reads "Emissions from each analysis year must be less....."
The reference to the 1-hour baseline is not applicable here.
Done

- 8) Section 2.5.3, Operations Management, type on page 20: please change "develop" to "developed" in the last sentence of this section.

Done

- 9) I could not download the Project Listings from the website (my computer crashed every time). Do they clearly identify CMAQ projects

The project listings for the conformity contain only non exempt projects that are included in the model. The 2035 RTP project listing does not contain clearly identified CMAQ projects since our region only selects those for the four-year TIP cycle. The 2008-2011 TIP does include a separate Appendix that does identify all of the CMAQ funded projects and the air quality benefits associated with the project.

regionally significant non-federal projects

The 2035 RTP project listing does not contain clearly identified regionally significant non-federal projects. The 2008-2011 TIP does include a separate chapter that identifies all of the regionally significant non-federal projects scheduled during the 2008-2011 TIP time period.

exempt projects

No, none of the documents clearly identify exempt projects. If this needs to be included in the project listings we can make that addition to the project listing.

and include evidence of fiscal constraint?

The fiscal constraint issue is covered in the Financial Plan for the 2035 RTP and additionally there is a financial plan for the 2008-2011 TIP.

- 10) Appendix 2, Applicable SIP Excerpts: the emission credits listed in the SIP do not match those listed in the conformity document, Table 11, for motorcycle adjustments, temp/humidity corrections, etc. I assume this is because the conformity analyses used the most recent demographic projections and vehicle registrations, but please confirm this.

The emission credits for all the conformities never exactly match the ones of the SIP since each time we run conformity is because the networks have changed and as a result the emissions and their adjustments will change.

- 11) Appendix 4, VMEPs: VMEP credit listed in this section (ie, 0.8 tpd VOC and 7.0 tpd NOx) does not match that listed in the conformity document, Table 11 (ie, 0.734 tpd VOC and 6.5 tpd NOx), or that listed in the 2004 Mid-Course Review SIP (ie, 0.60 tpd VOC and 3.6 tpd NOx). Please clarify which is the correct amount to take for conformity credit; credit may only be taken for what has actually been implemented or is expected to be implemented by the end of 2007.

We are not taking credit for VMEPS. We will take out the VMEPS from table 10 and fix table 11.

The conformity VMEPS need to match or exceed the SIP VMEPS and they are exceeding it.

- 12) Appendix 13, Transportation Control Measures: I'm confused by the TCM listing in this appendix, as it does not match the current TCMs as substituted by HGAC (Resolution No. 0505-SUPP, October 25, 2005),

submitted by TCEQ (May 2006), and approved by EPA (December 14, 2006). Please clarify.

The TCM list as substituted by HGAC via the above resolution is a subset of the TCMs included in the 2000 SIP. I see that the projects with zeros for project cost were inadvertently left off of the TCM appendix. This is revised.

- 13) Appendix 14, Approval/Adequacy Finding of MVEBs: Please include the MVEB approval found in 71 FR 52670 (September 6, 2006) which converts the MVEBs from "adequate" to "approved."

Done

- 14) RTP, page 22, typo: please correct "conversation" to "conversion" in the first two full sentences on this page.

This comment was submitted to the RTP group

- 15) RTP, page 74, Conformity Analysis Results: please remove the parenthetical statement "(as submitted in June XX, 2007)" from the sentence. Although TCEQ submitted new RFP MVEBs to EPA in June, these MVEBs are still going through the adequacy process and may not be used for conformity yet.

This comment was submitted to the RTP group

- 16) I've looked at the revised Appendix 13, but I still can't match those TCMs with the ones in the most recent TCM substitution of 2005/2006. See 10/28/2005 HGAC Resolution No. 0505-SUPP; I'm looking at Attachment B of this document - "Proposed Substitutions." This Attachment B should match your list in Appendix 13, but it doesn't.

As an example, see the comparison for the Bike/Ped TCMS between these two documents:

	Length (mi)	VOC (kg/day)	NOx (kg/day)
Attachment B	47.866	20.430	21.153
Appendix 13 ?	27.632	32.107	

Also keep in mind that in conformity, TCMs are accounted for in units (ie, miles, # of parking spaces, etc), not reduced emissions.

Is there an easy explanation, perhaps something I'm just missing, or do we need to have a small conference call next week to sort it out?

The projects do match. The replacement projects for the last substitution are only a subset of all the TCMs accounted for in the SIP. As far as the units of miles and parking spaces, we will add them in our appendix 13. Also, the whole appendix 13 will be re-done to accommodate the SIP format for the TCMs report.

TCEQ's comments: Please refer to H-GAC answers in yellow

- 1) Question: can you verify or state in an email that you expect 2008 emissions to be at or below the recently adopted 2008 MVEB (86.77/186.13). I'm asking because 2007 VOC emissions are above the 2008 MVEB, as reported in your table 2. (The trend certainly appears that way but wanted to ask for your verification since my mgmt may ask before signing our letter.)

We did not do any calculation for 2008, although we do expect the VOC emissions to go down and an interpolation between 2007 and 2009 VOC emissions will give 84.40 tpd for 2008 VOC emissions.

2) For consistency, we'd like to see the values in the VMEP calculations remain consistent with the other values by reporting out to two decimal places, i.e., table 10. The change in number is small and will not change the end result but we mention it to avoid questions.

I took the VMEPs out (please see next question).

3) On a related note, how does table 2 relate to tables 10 and 11, i.e., "final emissions" of 171.35 vs 164.25 and 87.38 vs 88.09? I assume it means you're not taking "conformity credit" for VMEP and TERP. However, under sections 2.3 and 6.4, and in tables 10 and 11, and table 10 footnote, final emission results, you do appear to be taking 2007 "credit." Could tables and statements be consistent or clarified or made more explicit?

I fixed it. Yes, we are not taking credit for VMEPS and TERP since that is what the CCC agreed on because we are significantly under the budget for 2007.

4) Table 7, page 30, why are collectors decreasing, why are freeway/tollways centerline static between 2025 and 2035, how does managed lanes column relate to the freeway/tollway column?

Chris Van Slyke

5) appendix 13, TCMs, the SIP uses a short ton, i.e., 2,000 lbs, but the table footnote indicates a metric ton to convert kilograms. Also, in the Midcourse Review SIP your TCM appendix, emissions are reported in tons-per-day; could this conformity appendix be converted to be consistent?

We did use the short ton- The TCMs listing was done in kg/day because reporting emissions on CMAQ projects to FHWA is done in kg/day and the output of MoSERS is in g/day.

6) abbreviations, CMAQ: add SAFETEA-LU
abbreviations, HGA vs HGB
abbreviations, RFP: *Reasonable* Further Progress
abbreviations, add SAFETEA-LU
abbreviations, TERP: Texas Emission Reduction *Program*

Done

7) need a revised appendix 13 that captures all the measures listed in Group 2 of the 2004 midcourse SIP Appendix F.6 (as substituted in 2006). Also, the "project types" nomenclature in conformity does not match the nomenclature used in the SIP and substitution. Therefore, in addition to adding units Peggy mentioned, could you please tie the conformity project type back to the SIP project types? Below are examples of what I mean--please no need to answer these examples —just need to see an appendix 13 that lists units and shows us how projects tie back to the SIP & substitution.

examples:

RCTSS project type in SIP appendix F.6 (group 2): 19 (16+3)

RCTSS project type mentioned in conformity: 0

TSM project type mentioned in SIP: 35 (26+2+7)

TSM projects in substitution: 11

TSM project type mentioned in conformity: 0

Bike/Ped number of projects in SIP (group 2): 50 (22+21+7)

Bike/Ped projects in substitution: 20
Bike/Ped projects in conformity: 27

The whole appendix 13 will be re-done to accommodate the SIP format for the TCMs report.

TXDOT's Comments: We have attached a spreadsheet copy of the inconsistencies identified by TXDOT during their QC, and the H-GAC's responses. Please also refer to H-GAC answers in yellow below.

Generally, it appears that most of the comments were as a result of the use of an older version of the H-GAC's project database during the QC exercise. Re-reviewing the TXDOT comments against a most recent version of the H-GAC's project database eliminated most of the inconsistencies spotted by TXDOT.

We have categorized the responses to TXDOT's comments into eleven (11) codes namely:

Code:	Description:
1	Coded correctly in the conformity networks. These errors were due the use of an older version of the project database during the QC exercise.
2	Coded correctly in the conformity network. The project description of these projects should have read "Reconstruct existing and widen....."
3	Coding Errors: These were actually coding errors in the networks. These errors have been fixed.
4	Coded correctly. These projects are fine the way they are coded.
5	Coded Correctly: The project description for these projects should have said "Reconstruct existing and Construct/Extend to New location....."
6	Coded correctly: These project were rehabilitation projects. They are not added capacity projects.
7	Odd Number Lanes (3, 5,). H_GAC does not model odd number lanes. Instead, the project is modeled with the closest even number lane and the facility type changed to divided.
8	Direct Connect or Grade Separation projects: Due to the non-directionality of H-GAC's freeway and toll road facilities in our

conformity networks, some direct connect and grade separation projects are not modeled.

9 This project operational year is outside the 2035 horizon year.

10 Not Modeled. Not regionally Significant

11 Cancelled projects.

FHWA's comments:

2035 RTP Comments: Please refer to H-GAC answers in yellow

1. Page 13: What are the units of the information provided in Table 2 (lane miles, centerline miles, etc.)? How does the information provided in Table 2 relate to the information provided in Table 7 of page 30 of the Conformity Determination documentation? See comment 5 below (Conformity Determination documentation comments).
Table 2 uses lane mile data (as noted) and has been updated to correspond with Table 7 of the Conformity Determination.
2. Page 25: Is added capacity an alternative in the “Smart Streets” concept?
No. Some Right-of-Way may be needed for some tools, such as turning bays, but adding extra lanes is not part of Smart Streets.
3. Page 40: The Environmental Justice (EJ) evaluation discussed in this section appears to focus on public transit. Given the increased utilization of toll roads, additional it is recommended that additional emphasis be given to highways and toll roads within the EJ analysis.
This advice will be used to guide on-going and future EJ research and analysis.
4. Page 44: Environmental Analysis discussion in this section identifies potential environmental issues, but does not appear to specifically address potential environmental mitigation strategies. It is recommended that additional emphasis be given to identifying potential environmental mitigation strategies.
Identifying potential mitigation strategies is part of the next phase of on-going environmental analysis.
5. Page 53: The discussion in the first paragraph on this page indicates “pass-through financing agreements” as a source of State funding. It is noted that Federal funding has been identified as a potential source for the repayment of pass-through financing.
Wording changed.

Additionally, it is recommended that the financial plan include additional information concerning the source of expected revenues (i.e., recent and historical funding trends, composition of Federal, State and Local sources of funding). It is also recommended that the financial plan include additional information concerning the utilization of “year of expenditure” costs (i.e., how “year of expenditure” costs were accounted for).

See Financial Forecast for 2035 RTP.

6. Page 74: Please confirm the emissions totals presented in Table 12. It is noted that the emissions totals indicated on Table 12 are different from those noted in Tables 2 and 11 on pages 12 and 39 respectively, of the Conformity Determination documentation. Please see comment 6 below (Conformity Determination documentation comments).

Table updated.

7. Page 76: The table on this page provides a summary of the actions taken to address the requirements of SAFETEA-LU. This summary and the 2035 RTP does not appear to address the Congestion Management Process (CMP) requirements of SAFETEA-LU. It is recommended that the 2035 RTP be revised to include a discussion concerning the CMP and the MPO’s actions to address the CMP related provisions of SAFETEA-LU.

Congestion Management Process language added to section Operations Management, and table updated to note Congestion Management Process.

Conformity Determination Documentation Comments: Please refer to H-GAC answers in yellow

1. Page 14: Recommend that “labeled” be replaced with “designated” in the last sentence of the first paragraph on this page. *Done*
2. Page 18: Recommend that “MPO’s” in the first sentence in #2, be replaced with “MPO.” *Done*
3. Page 19: Is the HOV conversion to HOT noted in 2.5.1 reflected in this conformity determination and updated 2035 RTP? *Yes, all HOV were coded as HOT for 2009 and beyond. These projects are listed on the TIP on the Fixed Guideway Modernization Projects.*
4. Page 20: Recommend that the first sentence in “2.7” be revised to reflect the appropriate section of the Conformity regulations concerning exempt projects. *Done*

5. Page 30: The information provided in Table 7, appears to indicate that Freeway/Tollway centerline mileage is not expected increase between 2025 and 2035.
This is correct since most of the projects happened by 2025 and there are very few projects between 2025 and 2035.
Additionally, the information appears to reflect a “conversion” of “other arterials” to “principal arterials” in 2025 and 2035. **This is unexpected, please confirm.**
This is also correct due to upgrading.
6. Page 39: Please confirm the final emissions results noted in Table 11 (and in similar Table 2, on page 12). **The final emission results have been confirmed and are the same as in table 2.**
7. Page 41: The last paragraph on this page should be revised to reflect changes to the official public comment period and corresponding dates. **Done**
8. Appendix 13: As previously noted by EPA and TCEQ, this appendix should document the timely implementation of Transportation Control Measures (TCM) as noted in the Houston SIP, consistent with the latest TCM substitution actions.
The projects do match. The replacement projects for the last substitution are only a subset of all the TCMs accounted for in the SIP. As far as the units of miles and parking spaces, we will add them in our appendix 13. Also, the whole appendix 13 will be re-done to accommodate the SIP format for the TCMs report.

Project Specific Comments:

1. Project 356: Project proposes construction of a new 4-lane roadway by 2019. Modeling indicates a 4-lane roadway in 2019, with a portion being a 1-lane roadway in 2007 and 2009 (northern half of project). Please clarify.
The project was modeled correctly; however the PROJ_ID was not put in links. It has been corrected.
2. Project 12115: Project proposes the implementation of “Smart Street Improvements” with no added capacity. Link listing indicates added capacity occurring in several segments along the project in 2019 (0 to 4-lanes) and 2025 (4 to 6-lanes). Project could not be located in modeling. Please clarify.
This project consists of two added capacity TIP projects 529 and both projects will be implemented by 2019 (0-4 lanes). Currently the road is non existent. Project 532 has been corrected in the network.
3. Project 12560: Project proposes widening from a 4 to 6-lane roadway by 2025. Link listing and modeling indicates 4-lanes in all analysis years. Additionally, the proposed project could not be located in the 2030 RTP. Please clarify.
This project has been deleted from the RTP database

4. Project 11617: Project proposes the construction of a new 4-lane roadway by 2019. Link listing indicates 2-lanes in all years. Modeling indicates a segment of new 4-lane roadway construction in 2019, but segment limits and projects limits do not appear consistent (i.e., only a small portion of proposed project). Please clarify.

Road is a new facility and will open as a 4 lane roadway in 2019. Limits are correct.

5. Project 6075: Project proposes widening to a 4-lane roadway by 2009. Link listing does not indicate 4-lane widening until 2025. Proposed project could not be located in modeling, the 2035 RTP or the FY 2008-2011 TIP. Please clarify.

Project 6075 has been cancelled and deleted from the project database. Overpasses are not explicitly modeled.

6. Project 41: Project proposes widening to a 4-lane roadway by 2007. Link listing indicates 4-lanes in 2007 and widening to 6-lanes in 2025 consistent with companion project. Initial project (41) could not be located in 2035 RTP or FY 2008-2011 TIP.

Project 41 was let in 2007. Project 12767 then widens it from 4 to 6 lanes in 2025. Project 41 is found in the PROJ_ID and Project 12767 is in PROJ_IDA.

7. Project 12154: Project proposes “Smart Street Improvements” including widening from to a 6-lane roadway in 2035. Link listing indicates widening to 6-lanes in 2025 and one segment with 6-lanes in all years. Project could not be located in modeling. Please clarify.

Project 12154 can be found in the SMART_ID field, while the expansion of Nasa Blvd. from 4 to 6 lanes, is Project 11680. However, the network was mistakenly coded as 6 lanes in all Conformity years. The network has been corrected.

8. Project 10038: Project proposes widening to a 4-lane roadway by 2009. Link listing indicates some portions as 4-lanes 2007, 4-lanes in 2009 and 6-lanes in 2019, 2025 and 2035. Modeling indicates 4-lanes in 2009 and 6-lanes in 2019, 2025 and 2035. The proposed project could not be located in the 2035 RTP. Please clarify.

Project 10038 (Gessner) is widen from 4 to lanes by 2009. The link has been corrected from 6 to 4.

9. Project 14203: Project proposes widening to 6-lane roadway by 2019. Project could not be located in link listing or modeling. Please clarify.

Project 14203 (IH 10) SH36 to Waller County is outside the model domain and it not modeled.

10. Project 6043: Project proposes widening to 8-lane roadway with managed lanes by 2019. Link listing indicates widening to 8-lanes in 2019 for several segments and also includes one segment with a 10-lane improvement and one segment with zero lanes in all years. Modeling indicates widening to 8-lane roadway with a 1-lane managed facility. The 2035 RTP does not indicate the construction of managed lanes. Please clarify.

Network is correct, however project description should read: widen to 8 lanes and 2 lane frontage roads with 2 managed lanes.

11. Project 907: Project proposes widening to a 6-lane tollway by 2035. Link listing indicates 4-lanes in all years. Modeling indicates 6-lanes in 2025 with no frontage roads. The 2035 RTP indicates widening from 4 to 6-lane tollway. Companion 2035 RTP project “10441” indicates 4-lane tollway with 2-lane frontage roads by 2019. Please clarify.

Project 907 was cancelled and deleted from the project database.

12. Project 14264: Project proposes widening to a 4-lane tollway by 2019. Modeling indicates 4-lanes in all years with some 2-lane frontage roads. 2035 RTP indicates construction of a 4-lane tollway with 2-lane frontage roads by 2019. Please clarify.

Project was modeled correctly. Project description should read construct 4-lane toll with two 2-lane non continuous frontage roads and interchanges

13. Project 283: Project proposes the construction of a 4-lane tollway by 2019. Modeling indicates 4-lanes in 2019, but no frontage roads. 2035 RTP indicates the construction of 4-lane tollway with limited 2-lane frontage roads by 2019. Please clarify.

The RTP network have been corrected

14. Project 316: Project proposes the construction of a 4-lane tollway by 2019. Link listing indicates 4-lanes in 2019. Modeling indicates 4-lanes in 2019, but does not indicate any frontage roads. 2035 RTP indicates the construction of a 4-lane tollway with limited 2-lane frontage roads by 2019.

Project 316 includes frontage roads in the description; however, more research is needed from TXDOT for the location of the non continuous frontage roads. The network currently has no frontage roads for this segment.

15. Project 11574: Project proposes widening to a 10-lane roadway by 2019. Link listing indicates 10-lanes in 2019 with 2-lane frontage roads in all years, but different limits (from Gessner to South of Hollister). Modeling includes a 1-lane

HOV in 2007 and 2009. 2035 RTP indicates widening to 10-lanes with 2-lane frontage roads by 2019. Please clarify.

Project 11574 (US 290) the project lanes are correct. The current HOV lane will be eliminated by after 2009 when Hempstead hwy comes on line. However, the current RTP indicated a limit change to Little York instead of Gessner. The network limits have been corrected.

16. Project 7428: Project proposes widening to 8 and 10-lane roadway with HOV by 2019. Modeling appears to indicate both an 8 and 10-lane roadway in this corridor with no HOV. 2035 RTP indicates widening to 8 and 10-lane roadway with HOV by 2019. Please clarify.

Project 7428 (US 59) the managed lanes have been extended