



CITY OF HOUSTON

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On behalf of the City of Houston, we submit these comments related to the two virtual public meetings held by the Houston-Galveston Area Council (H-GAC) on Thursday, April 8, 2021 to discuss proposed amendments to the 2045 Regional Transportation Plan (RTP). Staff of the two departments we lead, Houston Public Works and the Planning & Development Department, work in unison to evaluate and develop mobility betterments for the City of Houston. Our departments are actively engaged with H-GAC in development of the region's long-range transportation plan and are committed to working with regional partners, including H-GAC and TxDOT, in the federally required continuing, cooperative, and comprehensive planning process.

Several of the proposed RTP amendments are major highway infrastructure investments in the City of Houston along densely developed residential and commercial corridors. City officials have strong concerns about the proposed scope and schedules of these proposed additions to the region's long-range (20 year) transportation plan. The amendments propose construction initiation by 2030 which is within the region's 10-year program of Transportation Improvement Program (TIP) projects to be funded for construction rather than the long-range planning horizon. Most concerning, cooperative planning was started in the latter half of 2020 focused on design details rather than evaluation of corridor mobility needs and improvement alternatives.

The Federal Highway Administration (FHWA) Transportation Planning Process Briefing Book states the following in its Introduction.

"Transportation at its core is about mobility and access. Patterns of growth and activity for people and goods across America are fundamentally driven by how well the transportation system delivers mobility and access. 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."

As proposed, whether new projects or revived after decades-old analyses, the major infrastructure investments within the City of Houston will bypass the Planning and Environmental Linkages (PEL) 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.”

City officials believe that a thorough analysis of transportation demand, travel patterns, and environmental impacts is warranted given recent telework experience and technological advances changing how people and goods will move. Data from these analyses could impact the need and purpose for each project. They should be cooperatively undertaken prior to the NEPA process defining project purpose and need as well as alternatives to be evaluated. In addition, relevant City efforts including Houston’s Climate Action Plan goal to “Reduce Vehicle Miles Travelled per capita 20% by 2050”, should be incorporated into the purpose of all projects within the city’s limits.

Below are project-specific comments on proposed RTP amendments within City of Houston limits.

Hempstead 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 the metropolitan planning organization 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.”

IH 10W from IH 610W to IH 45

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.

IH 610W from IH 10W to IH 69S

Proposed Amendment. Construct 4 express lanes.

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

IH 10W 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.

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

SH 35 from Dixie Drive to Brazoria County Line

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

- 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.

IH 610E at Ship Channel

Proposed Amendment: Reconstruct and raise Ship Channel bridge.

- Consistent with Resilient Houston goals.

SH 6 from Clay Road to IH 10W

Proposed Amendment: Feasibility Study

- The City of Houston looks forward to early and continuing cooperative and comprehensive participation in the study.

Conclusion

The City of Houston has committed to several mobility-related actions as part of an ongoing effort to improve citywide resilience. Among them are the following elements City officials will work with regional partners to incorporate into project planning and development.

- Engage Houstonians in the design of mobility infrastructure. As regional partners make significant investments in increased mobility options in the coming years, it is imperative that Houstonians who will be impacted most have a voice in the planning process. The City will work with regional partners to form and facilitate a collective community engagement framework that consists of shared principles, coordinated processes, common tactics, and measurable outcomes for infrastructure projects within the city.
- Target transportation demand management (TDM) programs to reduce single-occupancy-vehicle travel and better manage demand on our transportation network.
- Upgrade Houston’s highway network with two-way HOV and HOT lanes. Expanding two-way high-occupancy vehicle (HOV) and high-occupancy toll (HOT) lanes will encourage more Houstonians to choose sustainable transportation choices when commuting to regional job centers, while requiring less space per traveler than Single Occupancy Vehicle (SOV) lanes.
- Consistent with local standards, effectively manage water drainage on and from I-10 as well as holding water before entering the storm sewer system.

The combined Inner Katy Managed Lanes, I-610 Managed Lanes, and Hempstead 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 elevated express lane system. 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 City of Houston respectfully requests that H-GAC conduct a study, including public outreach and comment, of the Regional Express Access Lanes (REAL) concept proposed by TxDOT before adding these amendments to the 2045 RTP.**

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.” City of Houston officials are committed to continuing work with H-GAC and regional

partners to build region-wide consensus on improving transportation, promoting smart growth, protecting the environment, enhancing the economy and fostering equity through a continuing, cooperative and comprehensive planning process.

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

Sincerely,

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